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GOOD CORPORATE GOVERNANCE

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Best Achievements in Corporate Governance Implementation

The consistency of BNI's commitment to implementing disciplined Good Corporate Governance ("GCG") practices across all business activities has strengthened BNI's position as a company with strong integrity and high business quality. Through the implementation of robust governance practices, in 2025 BNI once again succeeded in receiving a number of prestigious awards, including the following:



"Leadership in Corporate Governance - Big Cap"

The 16th IICD Corporate Governance Conference & Award 2025



ASEAN Asset Class Public Listed Company

ASEAN Corporate Governance Conference & Awards July 2025



The Most Trusted Company pada Corporate Governance Perception Index 2025



Indonesia Excellence *Good Corporate Governance* Ethics pada Indonesia Excellence *Good Corporate Governance* Awards 2025

Commitment to Sustainable Corporate Governance Implementation

BNI reaffirms its commitment, amid ongoing business model transformation and the evolving regulatory landscape in the banking sector and the state-owned enterprise environment, to positioning the implementation of Good Corporate Governance (GCG) principles as the fundamental foundation of all business activities. This commitment aims to strengthen performance and enhance the Bank's contribution, maximize value for shareholders and stakeholders, and safeguard BNI's long-term business sustainability. BNI's consistency in implementing and enforcing GCG principles across all operational activities is inseparable from the strong awareness of the Board of Commissioners, the Board of Directors, management, and all BNI Hi-Movers to continuously reinforce a healthy, adaptive, and integrity-driven GCG culture. This commitment is aligned with regulatory requirements, global best practices, and the continuously evolving expectations of stakeholders within the BNI ecosystem.

As the largest state-owned banks in Indonesia with global competitiveness, and with a strong commitment to the AKHLAK corporate values and the spirit of GCG, BNI emphasizes its dedication to meeting the expectations of financial regulators, which increasingly prioritize financial system stability and strengthened risk management. In broad terms, the governance outcomes expected by BNI through the consistent and robust implementation of GCG are as follows:

1. Competitive and focused on long-term performance
2. Ethical and responsible in conducting business
3. Contributing positively to society and the environment
4. Capable of resilience and sustainable growth (corporate resilience)

To ensure the successful implementation of GCG, the Board of Directors and the Board of Commissioners consistently exercise their leadership roles in a responsible and accountable manner. The full commitment of executive management and employees to the implementation of GCG and strengthening a culture of integrity within BNI is demonstrated through the signing of the Integrity Pact by the Board of Directors, the Board of Commissioners, and all employees each year.

INTEGRITY AS A PILLAR OF A SUSTAINABLE STRATEGY

The Company believes that integrity is not merely a matter of compliance with applicable laws and regulations, but an integral component of its business strategy. The consistent application of integrity principles is reflected in decision-making processes, the execution of operational activities, and interactions with all stakeholders.

By positioning integrity as the foundation of both culture and strategy, the Company is able to safeguard its reputation, enhance operational effectiveness, and manage risks in a more prudent manner.

BOARD OF COMMISSIONERS INTEGRITY PACT

1. Perform duties and responsibilities diligently, accurately, and with full accountability in accordance with the authority granted by the Articles of Association of PT Bank Negara Indonesia (Persero) Tbk (hereinafter referred to as BNI), while adhering to BNI's Core Values, Code of Ethics, internal regulations, applicable laws and regulations, as well as sound banking management principles.
2. Create a work environment free from corruption, collusion, and nepotism (KKN) by promoting and supervising the implementation of the Anti-Bribery Management System (SMAP) and/or Gratification Control, including policies, strategies, evaluations, and the adequacy of human resources in SMAP operations.
3. Act objectively and adhere to ethical and moral values, fairness, transparency, consistency, while upholding honesty and commitment, and encourage all business partners to prioritize ethical, sound, and transparent business practices.

4. Refrain from all forms of conflicts of interest in performing duties and ensure that the independence of other BNI personnel remains unaffected.
5. Actively and optimally contribute to preventing potential fraud, refraining from engaging in or tolerating any form of fraud within the workplace, and committing to reporting any suspected fraudulent activity (occurring within the organization and/or utilizing BNI's facilities) through the reporting channels provided by BNI.
6. Willing to accept sanctions if, in the performance of duties and responsibilities as a BNI Employee, it is proven that the above commitments have not been fulfilled.

BOARD OF DIRECTORS INTEGRITY PACT

1. Create a work environment free from corruption, collusion, and nepotism (KKN) by promoting and supervising the implementation of the Anti-Bribery Management System (SMAP) and/or Gratification Control, realized through activities such as, but not limited to, refraining from offering, promising, and/ or receiving any form of remuneration to or from customers, debtors, vendors, partners, collaborators, regulators/ supervisors, and/or other external or internal parties.
2. Create a work environment free from corruption, collusion, and nepotism (KKN) by promoting and supervising the implementation of the Anti-Bribery Management System (SMAP) and/or Gratification Control, realized through activities such as, but not limited to, refraining from offering, promising, and/ or receiving any form of remuneration to or from customers, debtors, vendors, partners, collaborators, regulators/ supervisors, and/or other external or internal parties.
3. Act objectively and adhere to ethical and moral values, fairness, transparency, consistency, while upholding honesty and commitment, and encourage all business partners to prioritize ethical, sound, and transparent business practices.
4. Refrain from all forms of conflicts of interest in performing duties and ensure that the independence of other BNI personnel remains unaffected.
5. Refrain from using the Company's information and data for personal gain or for the benefit of other parties, as prohibited by internal and external regulations, such as insider trading, misuse of company data, and similar activities.
6. Make decisions with utmost caution (duty of care and loyalty) and professionalism in BNI's operational activities, including procurement of goods and services, human resource management, fund provision, and management of other business activities, in the best interest of BNI.
7. Actively and optimally contribute to Preventing potential fraud, refraining from engaging in or tolerating any form of fraud within the workplace, and committing to report any suspected fraudulent activities (occurring within the organization and/ or involving BNI's resources) through the reporting channels provided by BNI.
8. Willing to accept sanctions if, in carrying out my duties and responsibilities as a BNI employee, I am found to have failed to fulfill the commitments outlined above.

COMMITMENT TO THE IMPLEMENTATION OF THE GOOD CORPORATE GOVERNANCE INTEGRITY PACT

1. To embrace and consistently implement the Core Values of AKHLAK, BNI's Code of Conduct, and BNI's Internal Provisions.
2. To understand and comply with applicable regulations in carrying out duties in accordance with the principles of Good Corporate Governance.
3. To uphold integrity and adhere to ethical, moral, and honest values
4. To work professionally and with due diligence.
5. To actively understand and take full responsibility for the tasks and roles assigned.
6. To fully protect the confidentiality of Customer and Company data.
7. To avoid using company funds, data, assets, customers, or other parties cooperating with BNI for personal or family interests that may harm BNI.
8. To play an active role in preventing and eradicating fraud and to be willing to report any fraudulent activities within BNI.
9. To create a work environment free from Corruption, Collusion, and Nepotism (KKN).
10. To implement an Anti-Bribery Management System by avoiding gratuities, bribes, and extortion.
11. To refrain from using personal funds as bridging funds and/or personal accounts for company operational activities.
12. To avoid an excessive lifestyle.
13. To safeguard BNI's and use social media responsibly.

14. To avoid and disclose any form of conflict of interest.
15. To permit and willingly provide all information necessary for the enforcement of integrity.
16. To be accountable for all facilities and benefit received and ensure their use complies with applicable regulations.
17. To accept sanctions, including termination of employment and/or legal action, for any violation of this Integrity Pact.

PURPOSE OF IMPLEMENTING CORPORATE GOVERNANCE

BNI believes that the disciplined and consistent implementation of GCG practices within BNI is not only the foundation of sound governance, but also the key to the Company achieving the following strategic objectives:

1. Enhance BNI's corporate value by applying the principles of GCG, which include Transparency Accountability, Responsibility, Independence, and Fairness, in order to ensure BNI's competitiveness at both national and regional levels, and to achieve sustainable corporate value;
2. Encourage every BNI organ to consistently emphasize GCG culture in every decision-making process, based on applicable values and norms, as well as high compliance with existing laws and regulations;
3. Improve BNI's performance through efficiency programs created by the implementation of GCG culture within every BNI organ; and
4. Increase investor trust and position BNI as a top choice for investment.

FOUNDATION FOR THE IMPLEMENTATION OF CORPORATE GOVERNANCE [ACGS D.1.1]

The implementation of GCG at BNI is based on various provisions and guidelines as follows:

1. Law No. 7 of 1992 on Banking, as amended from time to time, most recently by Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector;
2. Law No. 8 of 1995 on Capital Markets, as amended by Law No. 4 of 2023 on the Development and Strengthening of the Financial Sector;
3. Law No. 19 of 2003 on State-Owned Enterprises, as amended several times, most recently by Law No. 16 of 2025 on the Fourth Amendment to Law No. 19 of 2003 on State-Owned Enterprises;
4. Law No. 40 of 2007 on Limited Liability Companies, as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
5. Financial Services Authority Regulation (POJK) No. 17/POJK.03/2014 on the Implementation of Integrated Risk Management for Financial Conglomerates;
6. POJK No. 18/POJK.03/2014 on the Implementation of Integrated Corporate Governance for Financial Conglomerates;
7. POJK No. 33/POJK.04/2014 on the Board of Directors and Board of Commissioners of Issuers or Public Companies;
8. POJK No. 35/POJK.04/2014 on Corporate Secretaries of Issuers or Public Companies;
9. POJK No. 21/POJK.04/2015 on the Implementation of Corporate Governance Guidelines for Public Companies;
10. POJK No. 31/POJK.04/2015 on Disclosure of Information or Material Facts by Issuers or Public Companies;
11. POJK No. 27/POJK.03/2016 concerning the Fit and Proper Test for Key Parties of Financial Services Institutions;
12. POJK No. 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies;
13. POJK No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports as partially revoked by POJK No. 13 of 2024 on Transparency and Publication of Basic Credit Interest Rates for Conventional Commercial Banks;
14. POJK No. 15/POJK.04/2020 on the Planning and Conduct of General Meetings of Shareholders of Public Companies;
15. POJK No. 42/POJK.04/2020 on Affiliated Transactions and Conflicts of Interest Transactions;
16. POJK No. 12/POJK.03/2021 on Commercial Banks as partially revoked by POJK No. 22 of 2025 on Commercial Bank Reporting through the Financial Services Authority Reporting System;
17. POJK No. 8 of 2023 on the Implementation of Anti-Money Laundering, Counter-Terrorism Financing, and Prevention of Proliferation Financing of Weapons of Mass Destruction Programs in the Financial Services Sector;
18. POJK No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks;
19. POJK No. 12 of 2024 on the Implementation of Anti-Fraud Strategies for Financial Services Institutions;

20. POJK No. 15 of 2024 dated October 9, 2024 on the Integrity of Bank Financial Reporting;
21. POJK No. 30 of 2024 dated December 19, 2024 on Financial Conglomerates and Financial Conglomerate Holding Companies;
22. OJK Regulation No. 14 of 2025 concerning the Implementation of General Meetings of Shareholders, Bondholders Meetings, and Sukukholders Meetings Conducted Electronically;
23. Circular Letter of the Financial Services Authority (SEOJK) No. 14/SEOJK.03/2015 on the Implementation of Integrated Risk Management for Financial Conglomerates;
24. Circular Letter of the Financial Services Authority (SEOJK) No. 15/SEOJK.03/2015 on the Implementation of Integrated Corporate Governance for Financial Conglomerates;
25. SEOJK No. 32/SEOJK.04/2015 on Corporate Governance of Public Companies;
26. SEOJK No. 39/SEOJK.03/2016 on the Fit and Proper Test for Prospective Controlling Shareholders, Prospective Members of the Board of Directors, and Prospective Members of the Board of Commissioners of Banks;
27. SEOJK No. 14/SEOJK.03/2025 dated June 24, 2025 on the Implementation of Corporate Governance for Commercial Banks;
28. Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 on Corporate Governance Guidelines and Significant Corporate Activities of State-Owned Enterprises;
29. Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 on the Organs and Human Resources of State-Owned Enterprises;
30. BNI's Articles of Association;
31. Various guidelines for the implementation of Good Corporate Governance, including the Indonesian Corporate Governance Manual (Pedoman Umum Governansi Korporat Indonesia/PUGKI) issued by the National Committee on Governance Policy (KNKG), the ASEAN Corporate Governance Scorecard (ACGS) issued by the Organisation for Economic Co-operation and Development (OECD), and the Principles for Enhancing Corporate Governance issued by the Basel Committee on Banking Supervision.

Correlation Between Corporate Governance Implementation and Bank Performance

Through the implementation of strong Good Corporate Governance (GCG), BNI is able to achieve efficiency across its operational activities, enabling the Bank to maintain excellent service quality while sustaining positive financial performance growth amid dynamic economic challenges.

GOVERNANCE AWARDS IN 2025

BNI's commitment to implementing GCG principles has resulted in external recognition through the receipt of various prestigious awards in the field of corporate governance, including the following:

118,24

"Leadership in Corporate Governance - Big Cap"

The 16th IICD Corporate Governance Conference & Award 2025

92,60

"The Most Trusted Company"

Corporate Governance Perception Index Award 2025

"Indonesia Excellence Good Corporate Governance Ethics"

Indonesia Excellence Good Corporate Governance Award 2025

BUSINESS PERFORMANCE ACHIEVEMENTS IN 2025

Through transparent and accountable business management, BNI delivered solid performance by recording various positive achievements across key financial aspects. These accomplishments reflect the Bank's resilience and consistency in maintaining healthy growth amid evolving economic conditions, including the following:

Credit Growth In 15,9%

IDR **899,5** trillion



YoY

Growth of Low-Cost Funds In 28,9%

IDR **726,0** trillion



YoY

Rasio CASA *Bank Only*

70,4%

2024 equal to 70,4%

Capital Adequacy Ratio (CAR) by Bank Only

20,7%

2024 equal to 21,4%

Loan To Deposit Ratio (LDR)

86,4%

2024 equal to 96,1%

Non Performing Loan

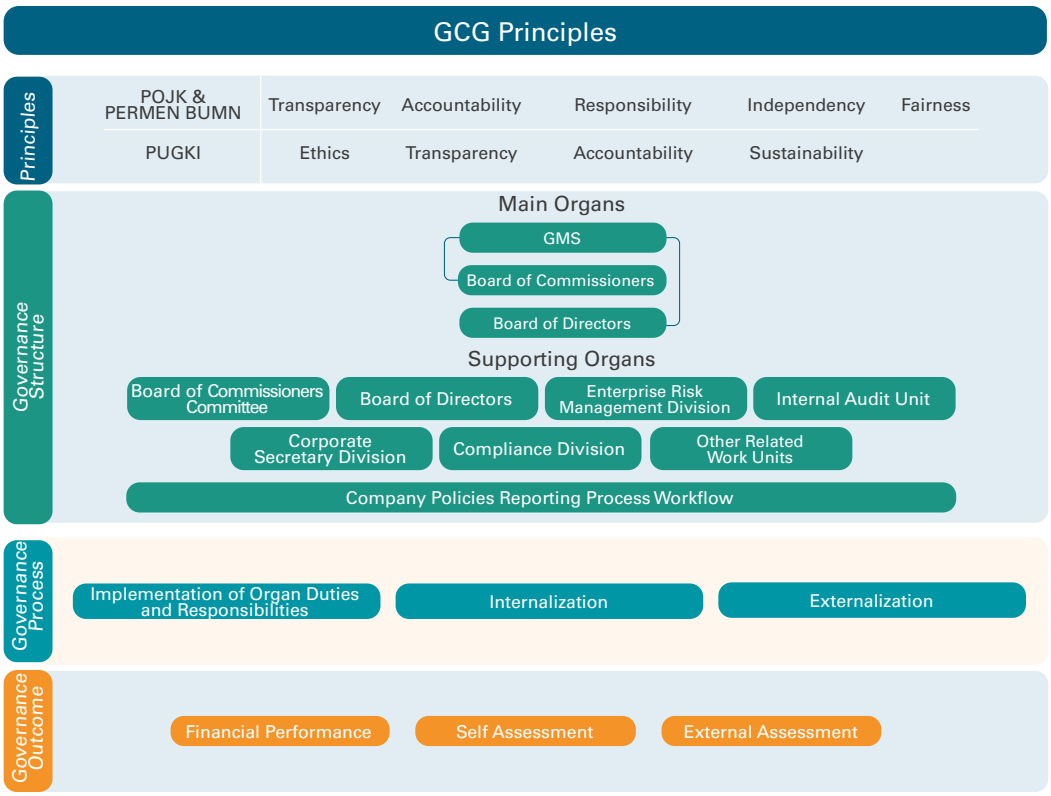
1,9%

2024 equal to 2,0%

Governance Framework

The implementation of GCG at BNI is reflected in the alignment of three core components of its governance system: the governance structure, governance process, and governance outcomes, dan governance outcome. These components are not only clearly defined, but are also closely interconnected and integrated across all areas of the Bank's business operations. Together, they are consolidated into a comprehensive governance framework developed with reference to prevailing guidelines and best practices, forming a critical foundation for BNI's sustainable growth and the ongoing strengthening of its governance in the future.

GOVERNANCE FRAMEWORK BNI



In broad terms, BNI's Governance Framework consists of 4 (four) key elements that serve as the foundation for implementing corporate governance:

1. Governance Principles are the principles that underpin the implementation of corporate governance at BNI, in accordance with regulations issued by the Financial Services Authority (OJK), the Ministry of State-Owned Enterprises, the Indonesian Code of Corporate Governance (PUGKI), as well as prevailing GCG best practices in the banking and capital markets sectors.
2. Governance Structure relates to the adequacy of governance structures and supporting infrastructure required to ensure that the implementation of GCG principles produces outcomes that meet stakeholder expectations. BNI's governance structure comprises the Board of Commissioners, the Board of Directors, committees, and corporate work units. The supporting governance infrastructure includes policies and procedures, management information systems, as well as the defined roles and responsibilities of each organizational structure.
3. Governance Process represents a series of activities for implementing GCG through a structured system, supported by effective monitoring processes, to ensure outcomes that align with the expectations of all stakeholders.
4. Governance Process represents a series of activities for implementing GCG through a structured system, supported by effective monitoring processes, to ensure outcomes that align with the expectations of all stakeholders.

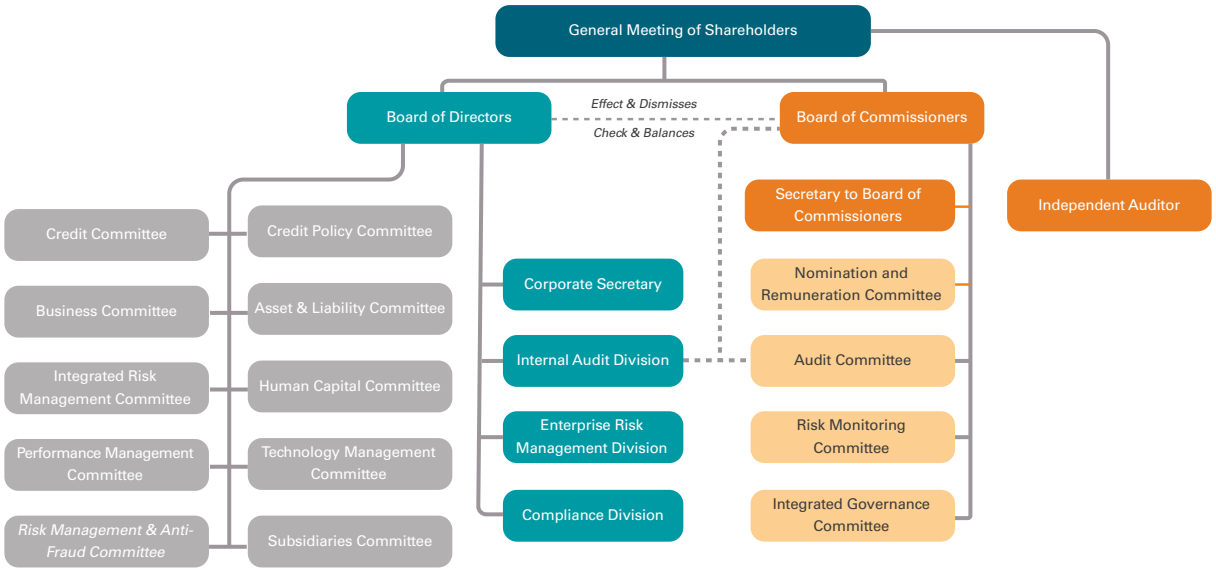
Corporate Governance Structure and Mechanism

CORPORATE GOVERNANCE STRUCTURE

BNI believes that the presence of a sound governance structure is a fundamental foundation for ensuring the consistent implementation of GCG principles. Such a structure is expected to have a positive impact on the quality of business performance, thereby ensuring that outcomes are aligned with stakeholder expectations. In practice, BNI's GCG structure comprises several principal governing bodies, namely the General Meeting of Shareholders (GMS), the Board of Commissioners, and the Board of Directors. These bodies are supported by various supporting organs, including committees under the Board of Commissioners and the Board of Directors, the Corporate Secretary, the Internal Audit Unit, the Enterprise Risk Management Division, and the Compliance Division. All of these organs carry out strategic functions in accordance with the Bank's Articles of Association, with the objectives of enhancing performance, safeguarding stakeholder interests, and strengthening compliance with prevailing laws and regulations.

BNI has established a governance structure with a clear separation of functions, duties, and responsibilities across each governing body, enabling every role to be performed effectively and optimally. Decision-making mechanisms and reporting lines for each organ are also designed to be transparent and firmly grounded in internal regulations as well as applicable statutory requirements. With this strong governance foundation, BNI is not only able to maintain the quality of GCG implementation, but also to continuously drive improvements across all lines of business, both at the Bank level and within its Subsidiaries. Alignment within this governance structure is a key factor in ensuring long-term business sustainability, as it ensures that every business action is carried out ethically, responsibly, and in accordance with sound business practices. Guided by this commitment, BNI remains confident in its ability to grow more resiliently, become increasingly adaptive in addressing challenges, and continuously accelerate its competitiveness within the increasingly dynamic banking industry.

BNI Governance Organ Structure



SOFT-STRUCTURE OF BNI GOVERNANCE

The consistent and sustainable implementation of governance at BNI is underpinned by a comprehensive framework of internal policies and guidelines. These instruments are periodically evaluated, refined, and enhanced to ensure continuous alignment with evolving statutory regulations and current operational conditions. All policies and guidelines are regularly disseminated to all employees and updated as necessary to remain relevant to organizational needs and shifting business dynamics. In this regard, the following is the list of BNI's GCG soft structures, reflecting the most recent updates:

1. Articles of Association of the Company;
2. BNI Code of Ethics as the Code of Conduct for BNI Hi-Movers;
3. Board of Commissioners Charter, pursuant to Board of Commissioners Decree No. KEP/017/DK/2025, dated September 19, 2025;
4. Board of Directors Charter, pursuant to Board of Directors Decree No. KP/339/DIR, dated August 06, 2024, the last update was made on January 28, 2026 and can be accessed through the official BNI website;
5. Audit Committee Charter and Audit Committee Code of Ethics, approved by the Board of Commissioners via Decree No. KEP/025/DK/2025, dated September 19, 2025;
6. Risk Monitoring Committee Charter, approved by the Board of Commissioners via Decree No. KEP/023/DK/2025, dated September 19, 2025;
7. Nomination and Remuneration Committee Charter, approved by the Board of Commissioners via Decree No. KEP/024/DK/2025, dated September 19, 2025;
8. Integrated Governance Committee Charter, approved by the Board of Commissioners via Decree No. KEP/022/DK/2025, dated September 19, 2025;
9. Asset & Liability Committee (ALCO) Guidelines, pursuant to Board of Directors Decree No. KP/455/DIR/R, dated September 10, 2025, regarding the Reorganization of the Asset & Liability Committee (ALCO);
10. Risk Management & Anti-Fraud Committee Guidelines, pursuant to Board of Directors Decree No. KP/454/DIR/R, dated September 10, 2025, regarding the Reorganization of the Risk Management & Anti-Fraud Committee;
11. Performance Management Committee Guidelines, pursuant to Board of Directors Decree No. KP/460/DIR/R, dated September 10, 2025, regarding the Reorganization of the Performance Management Committee;
12. Integrated Risk Management Committee Guidelines, pursuant to Board of Directors Decree No. KP/453/DIR/R, dated September 10, 2025, regarding the Reorganization of the Integrated Risk Management Committee;
13. Business Committee (KBI) Guidelines, pursuant to Board of Directors Decree No. KP/456/DIR/R, dated September 10, 2025, regarding the Reorganization of the Business Committee (KBI);
14. Technology Management Committee Guidelines, pursuant to Board of Directors Decree No. KP/461/DIR/R, dated September 10, 2025, regarding the Reorganization of the Technology Management Committee;
15. Credit Policy Committee (KRB) Guidelines, pursuant to Board of Directors Decree No. KP/457/DIR/R, dated September 10, 2025, regarding the Reorganization of the Credit Policy Committee (KRB);
16. Human Capital Committee Guidelines, pursuant to Board of Directors Decree No. KP/458/DIR/R, dated September 10, 2025, regarding the Reorganization of the Human Capital Committee;
17. Subsidiary Committee Guidelines, pursuant to Board of Directors Decree No. KP/459/DIR/R, dated September 10, 2025, regarding the Reorganization of the Subsidiary Committee;
18. Internal Audit Charter, pursuant to Board of Directors Decree No. KP/351/DIR/R, dated August 15, 2024;
19. Good Corporate Governance Policy, Corporate Guideline No. IN/006/CMP/001, dated January 24, 2025;
20. Integrated Governance Policy, Corporate Guideline No. IN/012/CMP/002, dated March 27, 2025;
21. General Risk Management Policy, Corporate Guideline No. IN/010/ERM/009, dated February 17, 2025;
22. General Integrated Risk Management Policy, Corporate Guideline No. IN/009/ERM/001, dated February 17, 2025;
23. General Internal Control System Policy, Corporate Guideline No. IN/002/ORM/010, dated January 07, 2025;
24. Anti-Fraud Strategy Policy, Corporate Guideline No. IN/006/AFR/002, dated December 22, 2025;

25. Dividend Policy, Corporate Guideline No. IN/006/CMP/001, dated January 24, 2025;
26. Corporate Guidelines on Handling Conflicts of Interest No. IN/013/CMP/004, dated May 09, 2025;
27. Corporate Guidelines on the Work Procedures of the Corporate Communications and Secretarial Division No. IN/007/CSE/001, dated June 21, 2024;
28. Corporate Guidelines on Prohibited and Permissible Securities Transactions for Insiders No. IN/500/KMP/001, dated September 23, 2019;
29. Policy on Anti-Money Laundering, Countering the Financing of Terrorism, and Countering the Proliferation Financing of Weapons of Mass Destruction (AML, CFT, and CPF) No. IN/009/CMP/002, dated March 27, 2025;
30. Corporate Guidelines on Procurement Procedures No. IN/846/PGV/001, dated November 28, 2025;
31. Corporate Guidelines on the Work Procedures of the Compliance Division No. IN/008/CMP/002, dated March 05, 2025;
32. Corporate Guidelines on the Whistleblowing System No. IN/030/IAD/002, dated October 23, 2025;
33. Corporate Guidelines on the Anti-Bribery Management System No. IN/118/CMP/006, dated December 27, 2024;
34. Corporate Guidelines on Gratuitous Control No. IN/726/KPN/002, dated September 24, 2021;
35. Corporate Guidelines on the Work Procedures of the Investor Relations Division No. IN/002/IRN/001, dated October 03, 2024;
36. Corporate Guidelines on General Procedures for Personal Data Protection No. IN/014/CMP/002, dated October 16, 2025;
37. Corporate Guidelines on Strategic Planning No. IN/006/CPM/002, dated August 25, 2025.

GOOD CORPORATE GOVERNANCE MECHANISM

BNI's GCG mechanism encompasses a structured set of methods, procedures, and regulations for implementing governance principles, supported by both robust structural and soft-structural frameworks. This mechanism is designed to ensure that all business processes operate in an orderly and aligned manner, delivering outcomes that meet stakeholder expectations. In practice, the effectiveness of GCG is underpinned not only by formal structures but also by a clear, integrated soft infrastructure. The synergy between GCG implementation and the Bank's Governance Organs serves as a strategic foundation for BNI to sustain superior performance, bolster stakeholder trust, and maintain resilience amidst the evolving dynamics of the sustainable banking and financial services industry.

Continuous Improvement of GCG Implementation Quality

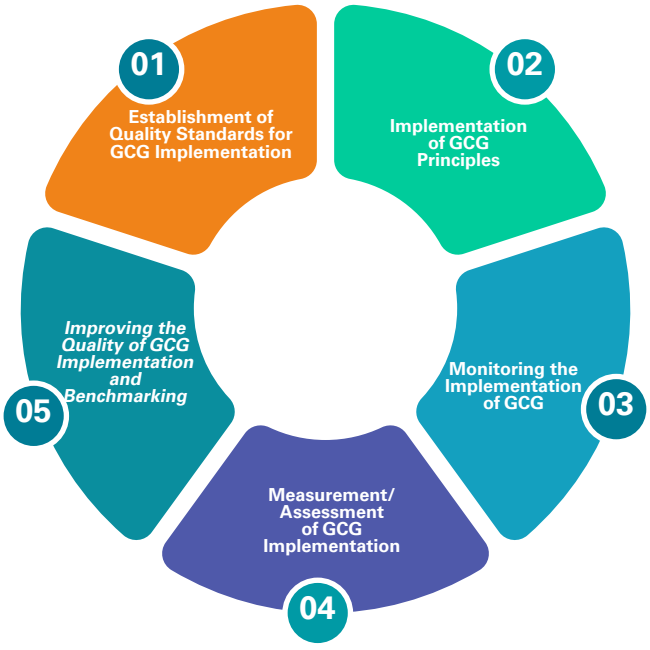
SETTINGTHE QUALITY STANDARDS OF GCG IMPLEMENTATION

BNI continues to strive to improve the quality of its governance implementation by designing a series of more structured, complementary, concise, and user-friendly internal regulations to guide daily operations. This step is taken to ensure that all Bank management activities and decision-making by each organ are carried out responsibly and in accordance with GCG principles.

As part of its ongoing commitment, BNI regularly evaluates its GCG implementation through self-assessment and external assessments by independent parties. The results of these evaluations serve as the basis for designing relevant improvement programs, including policies, internal control systems, and risk management to detect possible improvements early. Furthermore, BNI emphasizes strengthening the capacity of its Human Resources (HR) through ongoing training and briefings on the latest GCG practices and information, ensuring the Bank consistently conducts its business transparently, ethically, and responsibly.

To strengthen its governance, BNI has implemented various initiatives to improve the quality of its GCG implementation, as illustrated in the following chart:

The Cycle of Continuous Improvement in the Quality of BNI's GCG Implementation



1. BNI's Commitment to Maintaining Quality Standards for GCG Implementation

The implementation of GCG at BNI is based on the Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises. Furthermore, as an entity listed on the Indonesia Stock Exchange and under the supervision of the Financial Services Authority (OJK), BNI also aligns its GCG implementation with OJK Regulation No. 21/POJK.04/2015 concerning the Implementation of Governance Guidelines for Public Companies, as well as OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks. BNI's compliance with all these regulations is believed to not only ensure operational integrity and transparency but also strengthen stakeholder trust and support the Bank's sustainable growth.

As part of its strategic efforts to improve the quality of GCG implementation, BNI regularly reviews and adapts to global GCG best practice standards, focusing on practices that are relevant and can be effectively implemented in the banking industry, including:

1. General Guidelines for Indonesian Corporate Governance (PUGKI) developed by the National Committee for Governance Policy(KNKG);
2. Principles of Corporate Governance for State Owned Companies developed by the Organization for Economic Co-operation and Development (OECD), namely the ASEAN Corporate Governance Scorecard (ACGS);
3. Corporate Governance Perception Index (CGPI) organized by The Indonesian Institute for Corporate Governance (IICG). CGPI is research and ranking program for GCG implementation in companies in Indonesia;
4. Principles for Enhancing Corporate Governance issued by the Basel Committee on Banking Supervision;
5. ESG or Environment, Social, and Governance; and
6. Internalization of various laws and regulations and guidelines with national and international standards into BNI's internal policies.

2. Implementation of GCG Principles at BNI

BNI recognizes that not only is the sustainability of an entity measured by only financial performance and profit growth, but it also depends heavily on the effective implementation of GCG. In line with this awareness, BNI consistently and diligently applies GCG principles based on best practices at the national and global levels and implements them across all business and operational activities. GCG values are also internalized by all BNI Hi-Movers employees to build a work culture that upholds integrity, transparency, and accountability. With this approach, BNI can achieve comprehensive business balance in the short and long term, while ensuring the interests of Shareholders and other Stakeholders. The implementation of GCG principles is crucial to ensure the Bank's resilience in the face of increasingly competitive business conditions. In line with this, BNI continues to monitor and follow the development of relevant best GCG practices at the national, regional, and international levels, while adapting them to the Bank's needs and operational conditions.

A. Implementation of GCG Based on TARIF Principles

BNI's GCG practices are founded on the five core principles of good governance: Transparency, Accountability, Responsibility, Independence, and Fairness (TARIF). The application of these principles within BNI has been evaluated for compliance with Financial Services Authority Regulation (POJK) No. 17 of 2023 on the Implementation of Governance for Commercial Banks. This commitment has been endorsed by the Board of Commissioners, Board of Directors, management, and all BNI Hi-Movers to foster a Bank that achieves sustainable growth, global competitiveness, and robust resilience in its business operations.

The following is a description of the implementation of the 5 (five) basic principles of good governance at BNI:

GCG Principles	Implementation in BNI Environment
Transparency	• The Bank discloses information in a timely, adequate, clear, accurate, and comparable manner and can be accessed by stakeholders. • The Bank discloses information transparency that includes but is not limited to the Bank's vision, mission, business objectives, strategies, financial conditions, and material information and facts that may influence investordecisions. • The principle of transparency continues to pay attention to the provisions on Bank confidentiality, official confidentiality, and protection of personal data in accordance with applicable regulations. • The Bank's policies must be written and communicated to stakeholders and other parties who have the right to obtain information about the policy.
Accountability	• The Bank sets business targets and strategies to be accountable to stakeholders. • The Bank establishes a check and balance system in the management of the Bank. • The Bank has performance measures for all organizational organs based on agreed measures and in line with the Company's values (Corporate Culture Values), business targets and strategies of the Bank and has a rewards and punishment system. • Each organ of the Bank has clear duties and responsibilities, and has competence in accordance with its responsibilities and understands its role in the implementation of Good Corporate Governance. • The Bank adheres to the principle of prudence (prudential bank practices) and complies with applicable laws and regulations, articles of association and internal provisions. • The Bank as a good corporate citizen cares about the environment and carries out social responsibilities appropriately..
Responsibility	• The Bank adheres to the principle of prudence (prudential bank practices) and complies with applicable laws and regulations, articles of association and internal provisions. • The Bank as a good corporate citizen cares about the environment and carries out social responsibilities appropriately.
Independence	• The Bank avoids any unreasonable domination by any stakeholder and is not influenced by certain interests and is free from conflict of interest. • The Bank makes decisions objectively and is free from any pressure from any party.
Fairness	• The Bank pays attention to the interests of all stakeholders based on the principles of equality and fairness (equaltreatment). • The Bank provides an opportunity for all stakeholders to provide input and express opinions for the interests of the Bank and provides access to open information.

B. Implementation of GCG Based on the 2021 PUGKI Corporate Governance Pillars

In facing various challenges and complex business dynamics in the modern financial and banking industry, BNI continuously strives to implement best banking practices based on generally accepted GCG principles, one of which is by referring to the 2021 General Guidelines for Indonesian Corporate Governance (PUGKI), which was prepared and updated by the National Committee for Governance Policy (KNKG) as an improvement on the previous guidelines. The 2021 PUGKI Guidelines are designed to address regulatory developments, changes in the business environment, and increasing stakeholder expectations, so that BNI can maintain a balance between achieving business objectives, social responsibility, and supporting operational sustainability.

By thoroughly integrating the PUGKI principles, BNI ensures that all operational activities and decision-making are carried out transparently, accountably, responsibly, and ethically. This approach helps foster a strong work culture among all BNI Hi-Movers employees, strengthening organizational integrity and solidifying the Bank's position as a professional, competitive, and resilient state-owned banking institution in the face of global challenges. Furthermore, the implementation of sound corporate governance principles plays a significant role in enhancing investor and stakeholder confidence and in encouraging economic growth in line with sustainable development principles.

The following are 4 (four) pillars of corporate governance as outlined in the 2021 PUGKI, which have been adopted by BNI:

4 (Four) Pillars of Indonesian Corporate Governance



Pillars of Corporate Governance	Explanation	Implementation in BNI Environment
Ethical Behavior	In carrying out its activities, the corporation always prioritizes honesty, treats all parties with respect, fulfills commitments, builds and maintains moral values and trust consistently. The corporation pays attention to the interests of shareholders and other stakeholders based on the principles of fairness and equality and is managed independently so that each company organ does not dominate each other and cannot be intervened by other parties.	• The Bank is committed to internalizing the principles of Indonesian corporate governance in values, work culture, strategies, operational policies, and operational systems and procedures. This commitment is reflected in the signing of the Integrity Pact of the Board of Commissioners, Directors and all employees which is carried out periodically every year. • All Shareholders including Minority Shareholders and Foreign Shareholders are treated equally and fairly (equal treatment). In addition, all stakeholders are given the same opportunity to obtain information and submit
Accountability	Corporations can be held accountable for their performance in a transparent and fair manner. Therefore, Corporations must be managed properly, measurably and in accordance with corporate interests while still taking into account the interests of shareholders and stakeholders. Accountability is a prerequisite for achieving sustainable performance.	• The Bank sets business targets and strategies to be accountable to stakeholders. • The Bank establishes a check and balances system in managing the Bank. • The Bank has performance measures for all organizational organs based on agreed measures and in line with the Company's values (Corporate Culture Values), business targets and strategies of the Bank and has a reward and punishment system. • Each Bank organ has competence in accordance with its responsibilities and understands its role in implementing the principles of Indonesian corporate governance

Pillars of Corporate Governance	Explanation	Implementation in BNI Environment
Transparency	To maintain objectivity in conducting business, corporations provide material and relevant information in a way that is easily accessible and understood by stakeholders. Corporations take the initiative to disclose not only issues required by laws and regulations, but also matters that are important for decision-making by shareholders, creditors, and stakeholders.	• Banks disclose information in a timely, adequate, clear, accurate, comparable and accessible manner to stakeholders • Banks disclose information disclosures that include but are not limited to the Bank's vision, mission, business objectives, strategies, financial conditions, and material information and facts that can influence investor decisions. • The principle of transparency continues to pay attention to the Bank's confidentiality provisions, official confidentiality, and protection of personal data in accordance with applicable regulations. • Bank policies must be written and communicated to stakeholders and other parties who have the right to obtain information about the policy.
Sustainability	The Corporation complies with laws and regulations and is committed to carrying out its responsibilities towards society and the environment in order to contribute to sustainable development through cooperation with all relevant stakeholders to improve their lives in a manner that is in line with business interests and the sustainable development agenda.	• The Bank integrates corporate strategy with sustainability values that consider the balance of environmental, social, and governance, as well as economic aspects. • In its implementation, the Bank also builds a comprehensive sustainability culture in every work unit so that green banking practices can be implemented optimally. • The Bank has formed an Environment, Social & Governance (ESG) Sub-Committee under the Risk Management & Anti-Fraud Committee, as well as a special department in the Enterprise Risk Management (ERM) Division to oversee sustainability practices at the Bank. • The Bank has considered Environmental, Social and Governance factors, and included sustainability principles in the Company's Code of Ethics, policies, and guidelines. • The Bank conducts various internal programs to ensure sustainable implementation, including the socialization of the Indonesian Green Taxonomy (THI) to business units, implementation of Environmental, Social, and Governance (ESG)-based training, Go Green initiatives, mandatory e-learning programs, and increasing ESG awareness through the BNI website and various communication channels such as Youtube and email blasts.

C. Footprints of GCG Implementation at BNI

Year	Record Activity
2001	The Board of Commissioners and Board of Directors of BNI through the signing of the Joint Decree of the Commissioners and Board of Directors No. KEP/001/DK and KP/001/DIR dated January 3, 2001 concerning the Implementation of Good Corporate Governance Principles as stated in the Corporate Governance Handbook of PT Bank Negara Indonesia (Persero)Tbk which was then used as a guideline for the Board of Directors and Commissioners to manage BNI.
2002	To improve the implementation of corporate governance, BNI has carried out the following activities: 1. Establishing a Compliance Unit and an Anti-Money Laundering Unit under the responsibility of the Legal and Compliance Division; 2. Establishing a Remuneration and Nomination Committee 3. Establishing an assessment center to improve the process/system for selecting executive positions; 4. Improving the banking information system; and 5. Establishing an Audit Committee Charter as a guide for members of the Audit Committee in carrying out their duties.
2003	BNI maintains its consistency in making improvements in various aspects, both in terms of commitment and compliance. To ensure this, every employee is required to sign a statement of compliance with the Code of Ethics. As one of BNI's concrete efforts to improve the quality of GCG implementation, in 2003, BNI formed an Executive Committee tasked with assisting the Board of Directors in certain areas, including: 1. Asset & Liability Committee (ALCO). 2. Risk Management Committee. 3. Credit Policy Committee. 4. Human Resources Committee. 5. Technology Management Committee.

Year	Record Activity
2004	Throughout 2004, BNI carried out various accelerations and innovations which resulted in a number of important achievements in the implementation of GCG, including: 1. The establishment of a Good Corporate Governance Committee tasked with assisting the Board of Directors in evaluating and optimizing the effectiveness of GCG policies and implementation in BNI's work environment. 2. BNI was assessed as one of five public companies with good Corporate Governance practices in a survey conducted by Standard & Poor's Governance Services and the Corporate Governance and Financial Reporting Center (CGFRC) headquartered in Singapore. 3. The successful implementation of a Zero Fraud program to foster healthy and responsible banking practices, risk awareness, and close supervision of deviant behavior. This program is supported by the reward & punishment method; 4. The formation of a Work Ethics Team that works under the Human Resources Committee; and 5. Improved stakeholders' access to all information that has a material impact on BNI, including quarterly financial reports, annual reports, information on the use of funds from corporate actions, information that can influence investors' investment decisions, results of General Meetings of Shareholders, and other important events concerning BNI, both through the BNI website, reports to the OJK, Stock Exchange, mass media, public exposure, and analyst meetings.
2005	BNI delivered its commitment to implementing GCG through the establishment of a GCG Monitoring organizational unit through the Decree of the Board of Directors No. KP/174/DIR/R dated April 26, 2005.
2006	BNI affirmed its commitment by signing the 'Statement of Commitment to Implement Good Corporate Governance' by all Directors, Board of Commissioners, and Division Leaders at the Company's Work Meeting, and by all employees at all levels of the organization and renewed annually.
2007	As a follow-up to the signing of the 'Statement of Commitment to Implement Good Corporate Governance' in the previous year, BNI has prepared a GCG program including: 1. GCG e-learning. 2. BNI Commissioners and Directors' Guidelines and Work Procedures. 3. BNI Human Behavior Requirements Book, which consists of BNI HumanWork CultureValues and Main Behaviors called PRINCIPLE 46. 4. BNI received the title of Trusted Company in the Corporate Governance Perception Index ranking held by The Indonesian Institute for Corporate Governance (IICG) and SWA magazine.
2008	BNI strengthened the implementation of the KnowYour Customer Principle (PMN) and the implementation of the Money Laundering Crime Law (UU TPPU), the Compliance Division in collaboration with the Information Technology Division developed and continued to refine a system integrated with the iCONS system to identify suspicious financial transactions.
2009	Its consistent GCG implementation by all BNI personnel resulted in increase in performance with 103 growth compared to the previous year.
2010	BNI improved GCG through the following measures: 1. Launching an integratedWhistleblowing System (WBS) 2. Improvement of the BNI employee code of conduct aimed at improving the quality of BNI employees. 3. BNI's participation in the GCG implementation ranking conducted by independent rating agencies, namely the Center for Good Corporate Governance, Universitas Gadjah Mada (CGCG UGM), and The Indonesian Institute for Corporate Directorship (IICD).
2011	BNI has garnered various awards from various national and international institutions, including: 1. Best ofThe Best Company BUMN 2011. 2. The Most Admired ASEAN Enterprise Economics Challenges Award 2011. 3. MostTrusted Company fromThe Indonesian Institute for Corporate Governance (IICG); and 4. BNI's information technology governance has been recognized for its reliability by being awarded the IT Governance Award by the Ministry of BUMN.
2012	BNI is consistently able to maintain the quality of GCG implementation, which is reflected in the following conditions: 1. The results of the self-assessment according to Bank Indonesia regulations in 2011 and 2012 showed a stable trend with a composite predicate of Very Good; and 2. The establishment of the Anti-Fraud Unit Committee which was formed based on the Decree of the Board of Directors No. KP/508/DIR/R dated November 9, 2012 concerning the Establishment of the Anti-Fraud Unit Committee (KAF).
2013	BNI has successfully won a number of awards from various national and international institutions, including: 1. MostTrusted Company Based on Investors and Analysts Assessment Survey at the Good Corporate Governance Award 2013. 2. Most Trusted Company Based on Corporate Governance Perception Index (CGPI) at the Good Corporate Governance Award 2013. 3. Award as The Best Bank in Indonesia in Developing Good Corporate Governance (GCG) from Asiamoney Magazine.
2014	In addition to focusing on improving the quality of GCG implementation, BNI also continues to strive to increase its contribution to support economic and environmental growth by organizing a number of programs such as Kampoeng BNI, Partnership and Community Development Program, CSR activities organized by BNI Syariah, and commitment to the One Billion IndonesianTrees (OBIT) program which has planted more than 7 million trees in the last 7 years.

Year	Record Activity
2015	BNI successfully won the award as "The Best State Owned Enterprise and Top 50 Public Listed Companies" at the Good Corporate Governance Award event organized by The Indonesian Institute for Corporate Directorship (IICD).
2016	BNI successfully won a number of awards from various national and international institutions, including: 1. The The Best State Owned Enterprise and Top 50 Public Listed Companies at the Good Corporate Governance Award event organized by the Indonesian Institute for Corporate Directorship (IICD). 2. Most Trusted Company Based on Corporate Governance Perception Index (CGPI) at the 2016 Good Corporate Governance Award.
2017	BNI made proud achievements by winning various prestigious awards from leading institutions at the national and international levels, including: 1. 1st Place in the Listed Financial BUMN Category in the 2016 Annual Report Award event. 2. The Best State Owned Enterprise and Top 50 Public Listed Companies in the Good Corporate Governance Award event held by The Indonesian Institute for Corporate Directorship (IICD). 3. Most Trusted Company Based on Corporate Governance Perception Index (CGPI) at the 2017 Good Corporate Governance Award.
2018	BNI's reputation is increasingly recognized through the achievement of various prestigious awards from national and international institutions, including: 1. The Best State Owned Enterprise and Top 50 Public Listed Companies in the Good Corporate Governance Award event held by the Indonesian Institute for Corporate Directorship (IICD). 2. Most Trusted Based on Corporate Governance Perception Index (CGPI) at Good Corporate Governance.
2019	As a result of its strong commitment to implementing GCG in accordance with best practices and applicable regulations, BNI has successfully won a number of prestigious awards, including: 1. The Best State Owned Enterprise and Top 50 Public Listed Companies in the Good Corporate Governance Award event held by the Indonesian Institute for Corporate Directorship (IICD). 2. Most Trusted Based on Corporate Governance Perception Index (CGPI) in Good Corporate Governance. 3. The Best Good Corporate Governance Issuer from IDX Channel. In 2019, BNI began implementing digitalization in the implementation of Board of Directors Meetings and the implementation of GCG commitments for all BNI Hi-Movers. To improve the implementation of GCG, the Bank collaborated with IICD to improve the implementation of GCG at BNI.
2020	BNI always strives to continue to make improvements and innovations to realize one of BNI's missions "To be a reference for the implementation of compliance and good Corporate Governance for the Industry". These efforts have received recognition and awards from external and independent parties in the form of: 1. Award as the "Most Trusted Company" from The Indonesian Institute for Corporate Governance (IICG). 2. Predicate as a "Very Good" company in implementing GCG based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesian Institute for Corporate Directorship (IICD). 3. The Best GRC Overall for Corporate Governance & Performance 2020 (International Trade & Corporate Banking) at the GRC (Governance, Risk & Compliance) & Performance Excellence Award 2020 held by Businessweek Indonesia and the CEO Forum; and 4. Award for Rank I Gratification Control Unit (UPG) in the State-Owned Enterprises (BUMN)/Regional-Owned Enterprises (BUMD) Category from the Corruption Eradication Commission (KPK).
2021	BNI has won several awards from various national and international institutions, including: 1. Award as the "Most Trusted Company" from The Indonesian Institute for Corporate Governance (IICG). 2. Predicate as a "Very Good" company in implementing GCG based on the ASEAN Corporate Governance Scorecard (ACGS) standard from the Indonesian Institute for Corporate Directorship (IICD). 3. 2nd place winner of The Best Indonesia GCG Award VI-2021 in the Public Company - Book IV Bank category organized by the Economic Review. 4. Achievement of a score of 100 for the implementation of the 2021 Gratification Control Program from the KPK. Other achievements in the field of GCG carried out by BNI during 2021 to improve the quality of GCG implementation internally, include: 1. Changing GCG management to be under the coordination of two divisions or work units, namely the Compliance Division and the Corporate Secretary. This is done so that GCG management, both individually and integrated, is more effective. 2. Signing of the Cooperation Agreement (PKS) between BNI and the Corruption Eradication Commission regarding Handling Complaints in Efforts to Eradicate Criminal Acts of Corruption based on PKS No. 67 of 2021 and No. DIR/153 dated March 2, 2021, which aims to build and improve the effectiveness and efficiency of handling complaints both internally and externally which are integrated by prioritizing confidentiality in order to optimize the eradication of criminal acts of corruption in the work environment. 3. Approving the establishment of the Anti-Fraud Unit based on the Decree of the Board of Directors No. KP/291/DIR/R dated June 28, 2021 concerning the establishment of the Anti-Fraud Unit Organization (SAF) which aims to improve the implementation of the Anti-Fraud Strategy at BNI through prevention, detection, investigation, reporting, and sanctions, monitoring, and evaluation activities.

Year	Record Activity
2022	BNI has received a number of awards from various national and international institutions, including: 1. Award as "The MostTrusted Companies" fromThe Indonesian Institute for Corporate Governance (IICG). 2. Award as "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD). 3. Achievement of a score of 100 for the implementation of the Gratification Control Program in 2022 from the KPK. In 2022, BNI delvered many achievements in the field of GCG to improve the quality of GCG implementation internally, as given below: 1. Signing of Integrity Pact by all employees as a manifestation of the implementation of AKHLAK, Principle 46,and RACE; and 2. Establishment of ESG Implementation Coordinator Group at BNI based on Decree No. REN/2/173/R dated June 30, 2022 and Appointment of Consultant in order to assist the process of preparing framework, roadmap, and implementation of ESG at BNI.
2023	BNI has strengthened its reputation as a leading institution by winning a number of prestigious awards from various national and international bodies, including: 1. The award as "The Most Trusted Companies" from The Indonesian Institute for Corporate Governance (IICG); 2. The award for "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD); and 3. The Annual Report Award (ARA) 2022, placing second in the State-Owned Financial Enterprises category. In 2023, BNI recorded several achievements in the field of GCG to strengthen the quality of its internal implementation, including: 1. Implementation of the New Way of Working (NWOW) initiative to support faster business development processes and enhance employee productivity by adopting a more agile working method; and 2. To strengthen the internal control system, BNI established the Operational Risk Management (ORM) Division and the Senior Operational Risk Executive (SORX), consisting of four functional units: SORX Wholesale Banking, SORX Network & Services, SORX Consumer Banking & Corporate Function, and SORX Technology, Digital & Operations.
2024	BNI's discipline and consistency in improving the quality of GCG implementation have led the Bank to receive various prestigious awards, including: 1. The award as "The Most Trusted Companies" from The Indonesian Institute for Corporate Governance (IICG); 2. The award for "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD); 3. Winner in the State-Owned Financial Enterprises category at the Annual Report Award (ARA) 2023; 4. The 2024 Informative Qualification Award for State-Owned Enterprises from the Central Information Commission (KIP). In 2024, BNI undertook several efforts to strengthen its implementation quality and GCG, including: 1. Re-certification of ISO 37001 Anti-Bribery Management System (ABMS); and 2. Establishment of the Data Protection Officer (DPO) under the Compliance Division to implement the Personal Data Protection Law..
2025	BNI successfully won several awards from various national and international institutions, including: 1. The award as "The Most Trusted Company" at the Corporate Governance Perception Index (CGPI) Award 2025 from Indonesia Independen Cipta Governansi (IICG). 2. Indonesia Excellence GCG Ethics at the Indonesia Excellence GCG Award 2025 from Warta Ekonomi. 3. The award for "Leadership in Corporate Governance" from the Indonesian Institute for Corporate Directorship (IICD); 4. Third-place winner in the Public Listed State-Owned Financial Enterprises category at the Annual Report Award (ARA) 2024; 5. The award for the company with the highest increase in desk evaluation score at the Annual Report Award (ARA) 2024; 6. Recognition as an Indonesian issuer included in the ASEAN Asset Class PLC's category at the ASEAN Corporate Governance Conference & Awards 2025 based on the ASEAN Corporate Governance Scorecard. In 2025, BNI implemented several measures to strengthen its application quality and GCG, including: 1. Surveillance Audit for ISO 37001:2016 Anti-Bribery Management System Certification; 2. Establishment of the AML-CFT Division as an implementation of the Financial Services Authority Regulation on AML/CFT and the ESG Division to strengthen ESG implementation at BNI.

3. Monitoring GCG Implementation

BNI places GCG implementation as the primary foundation in all operational activities and strategic decision-making. To ensure consistent implementation of GCG principles, BNI implements a systematic and ongoing monitoring mechanism. This monitoring includes evaluating compliance with internal policies, applicable regulations, and best practice standards in the banking industry.

Monitoring is carried out through various approaches, including routine reviews by relevant units, periodic audits, and periodic reporting to the Board of Commissioners and Board of Directors. In addition, BNI utilizes supporting committees such as the Audit Committee, Risk Monitoring Committee, and Integrated Governance Committee to ensure that every aspect of GCG is implemented effectively and transparently.

The results of GCG monitoring are used as a basis for decision-making and continuous improvement. Any findings related to compliance, risk management effectiveness, or potential conflicts of interest are analyzed and followed up appropriately. Thus, GCG monitoring serves not only as a supervisory tool but also as a means to strengthen a culture of integrity, accountability, and transparency across the organization.

4. Implementation of GCG in 2025 and Person in Charge of GCG Implementation

BNI has assigned the Compliance Division and the Corporate Secretary Division to be responsible for implementing GCG at all levels of the organization. Through this mandate, BNI ensures that all business activities are carried out ethically, accountably, and in accordance with applicable regulations. This appointment was confirmed through Board of Directors Decree No. KP/133/DIR/R dated April 7, 2021. Throughout 2025, the Compliance Division together with the Corporate Secretary Division have carried out a series of tasks and functions in the context of implementing GCG at BNI, including:

1. Signing of the Good Corporate Governance Integrity Pact by the Board of Directors, Board of Commissioners and all employees.
2. Monitoring and evaluating GCG implementation and internal control.
3. Know Your Employee (KYE) as one of the inherent supervision efforts for employees to ensure that fraud does not occur by considering whether there are indications that require further attention (irregularities).
4. Encourage the implementation of the Governance, Risk and Compliance (GRC) forum consistently both in BNI and its Subsidiaries.

5. Measurement/Assessment of GCG Implementation

In line with BNI's commitment to the importance of internalizing GCG principles to support business sustainability, the Bank consistently improves GCG practices across all operational aspects through periodic assessments. This effort reflects BNI's commitment to consistently managing its business ethically, in compliance with regulations, and in line with prevailing banking industry policies. More than just an internal requirement, GCG assessments are the foundation for transparency in all decision-making. This is key to the Bank maintaining stakeholder trust while building strong and sustainable relationships with all relevant parties.

Periodic assessments of GCG implementation are conducted by the Bank independently (self-assessment) based on measurable and standardized parameters, or in collaboration with third parties to obtain more objective and independent assessment results. Through these periodic assessments, the Bank is able to identify areas requiring improvement and follow up by formulating strategies to strengthen governance, ensuring BNI's performance continues to grow consistently and sustainably.

Self-Assessment

A. Assessment Procedure

BNI conducts a self-assessment of the implementation of Governance principles every semester in accordance with the provisions of POJK No. 17 of 2023 and SEOJK No. 14/SEOJK.03/2025 concerning the Implementation of Governance for Commercial Banks. The assessment is carried out in a comprehensive and structured manner on three main aspects, namely: (1) Structure, (2) Process, and (3) Results, while still considering the 15 (fifteen) Governance Implementation Assessment Factors which are described as follows:

a) Governance Structure
The goal of the governance structure assessment is to determine if the Bank's infrastructure and governance structure are enough to ensure that the application of good governance principles yields results that meet stakeholder expectations. BNI's Governance Structure consists of

the Board of Commissioners, Board of Directors, Committees, and work units in the Bank. Meanwhile, what is included in BNI's Governance infrastructure includes the Bank's policies and procedures, management information systems, and the main tasks and functions of each organizational structure.

b) Governance Process
The assessment of the Governance process aims to assess the effectiveness of the process of implementing good governance principles supported by the adequacy of the Bank's governance structure and infrastructure so that it shows results that are in accordance with the expectations of stakeholders.

c) Governance Outcome
The assessment of Governance results aims to assess the quality of outcomes that meet the expectations of stakeholders which are the results of the process of implementing good corporate governance principles and supported by the adequacy of the Bank's governance structure and infrastructure.

B. Assessment Criteria

The criteria used by BNI in conducting individual self-assessments refer to OJK Circular Letter No. 14/SEOJK.03/2025 concerning the Implementation of Governance for Commercial Banks. This self-assessment aims to map the strengths and weaknesses of Governance implementation using 15 (fifteen) assessment factors, which include:

a) Implementation of the duties, responsibilities, and authority of the Board of Directors;
b) Implementation of the duties, responsibilities, and authority of the Board of Commissioners;
c) Adequacy and implementation of Committee duties;
d) Handling conflicts of interest;
e) Implementation of the compliance function;
f) Implementation of the internal audit function;
g) Implementation of the external audit function;
h) Implementation of risk management, including the internal control system;
i) Provision of remuneration;
j) Provision of funds to related parties and the provision of large sums of money;
k) Integrity of reporting and information technology systems;
l) Shareholder aspects;
m) Implementation of anti-fraud strategies, including anti-bribery; and
n) Implementation of sustainable finance, including the implementation of social and environmental responsibility.

C. Assessor

The self-assessment process for GCG implementation is coordinated by the Compliance Division, involving the Board of Directors, the Board of Commissioners, and relevant units for a comprehensive assessment of the effectiveness of the implementation of governance principles.

D. Assessment Results

BNI recorded the following results of its self-assessments over the past three years:

Self-Assessment

Description	2025	2024	2023
Composite Value	2	2	2

Throughout 2025, BNI has conducted a self-assessment of its individual implementation of Good Governance and submitted it to the OJK, with the following results:

Results of Self-Assessment of GCG Implementation for Semesters I and II of 2025

Period	Rating	Rating Definition	Trend
Semester I/2025	2	Demonstrates the general application of good governance by bank management. The proper use of governance concepts reflects this. If there are flaws in the way governance principles are being used, bank management can usually fix them with standard procedures	Stable
Semester II/2025	2	Demonstrates the general application of good governance by bank management. The proper use of governance concepts reflects this. If there are flaws in the way governance principles are being used, bank management can usually fix them with standard procedures	Stable

Based on the two assessment results, the implementation of BNI Governance in 2025 can be summarized as follows:

The strength of BNI's Corporate Governance Implementation throughout 2025 is described as follows:

i. Governance Structure
BNI's governance structure has been designed in accordance with regulations and best practices in the banking industry. The composition of the Board of Commissioners and Board of Directors reflects an adequate balance of roles, competencies, and independence. The existence of supporting committees under the Board of Commissioners strengthens the supervisory function and ensures effective checks and balances. Furthermore, policies and guidelines related to governance have been comprehensively developed.

ii. Governance Process
BNI's governance process is implemented through transparent, accountable mechanisms based on the principle of prudence. Decision-making is carried out wisely and effectively, involving relevant units to ensure objective results. Internal control and risk management systems are strictly implemented to maintain regulatory compliance and protect the interests of all stakeholders.

iii. Governance Outcome
BNI periodically evaluates the impact of GCG implementation on the company's performance and sustainability. The results of good governance implementation are reflected in an increasingly solid financial reputation, consistent performance growth, increased operational effectiveness, and improved service quality to customers and all stakeholders.

GCG Assessment by External Parties during the Last 3 (Three) Years

GCG Assessment Based on CGPI Standards

Using the findings of the Corporate Governance Perception Index (CGPI) evaluation carried out byThe Indonesian Institute for Corporate Governance (IICG) as one of the guidelines for enhancing the implementation of sustainable governance principles is one way that BNI keeps improving the application of good governance principles.The application of the CGPI assessment employs a stakeholder perspective, where relationships with all stakeholders are becoming more and more crucial in preserving the company's long-term business continuity, as well as a reference for the implementation of generally applicable best practices and mandatory GCG.

A. Assessment Procedure

Prosedur penilaian CGPI oleh IICG merupakan program riset dan pemeringkatan penerapan GCG di Indonesia. Penilaian CGPI mencakup pemenuhan kepatuhan (compliance) terhadap aturan, prinsip, dan sistem pengendalian yang ada dan berlaku; pemastian kesesuaian dan keselarasan (conformance) terhadap nilai etika dan norma yang berlaku serta standar mutu kualias yang ada; termasuk juga lingkup perwujudan pencapaian kinerja (performance) keuangan dan non-keuangan di perusahaan.

B. Assessment Results

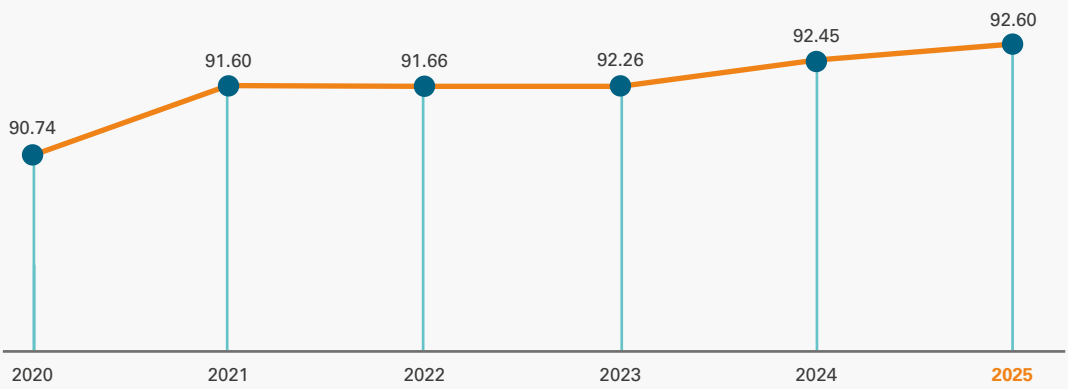
The IICG's CGPI assessment procedure is a research and ranking program for GCG implementation in Indonesia. The CGPI assessment covers compliance with existing and applicable rules, principles, and control systems; ensuring conformity and alignment with applicable ethical values and norms, as well as existing quality standards; and also assessing the scope of financial and non-financial performance within the company:

CGPI Assessment Results for Financial Year 2024-2025

Indicator	2025	2024	2023
Governance Structure	25,07	30,71	30,67
Governance Process	33,84	30,92	30,31
Governance Outcome	33,69	30,82	31,28
Skor CGPI	**92,60**	**92,45**	**92,26**

BNI's CGPI Trends Over the Past 5 (five) Years

The following is a breakdown of the CGPI assessment results over the past 5 (five) years:



In the 2024 CGPI, held in 2025, one subsidiary, BNI Sekuritas, received the title "The Trusted Company," with a score of 82.32:

GCG Assessment Based on ACGS Standards

In addition to the CGPI, BNI also underwent an external assessment of its Corporate Governance implementation based on the ASEAN Corporate Governance Scorecard (ACGS) parameters, which refer to the Corporate Governance principles of the Organization for Economic Cooperation and Development (OECD). The ACGS is an initiative of the ASEAN Capital Market Forum (ACMF), supported by the Asian Development Bank (ADB), intended to encourage better GCG practices for listed companies in ASEAN. BNI's participation in the ACGS aims to align the Bank's internal GCG practices with regional standards and encourage harmonization of GCG implementation across ASEAN.

A. Assessment Procedure

The ACGS assessment procedure is carried out through a review of English-language documents and information provided by the Bank to the public, including information contained in the Annual Report, website, announcements and circulars made by listed companies.

B. Assessment Criteria

The ACGS assessment components are as follows:

1) Rights and Equal Treatment of Shareholders;
2) Sustainability and Resilience;
3) Disclosure and Transparency; and
4) Responsibilities of the Board of Directors and Board of Commissioners.

C. Parties Conducting the Assessment

The assessment is conducted by ACMF through the Domestic Ranking Body (DRB) appointed by the regulator of each country as a representative in each participating country. The DRB conducts assessments on a national scale, to be further peer reviewed by the DRBs of other ASEAN member countries. Since 2016, OJK has appointed PT RSM Indonesia Konsultan (RSM) as the DRB to conduct assessments in Indonesia. In addition, the ACGS assessment in Indonesia is also conducted by the Indonesian Institute for Corporate Directorship (IICD).

D. Assessment Results

In 2025, BNI received the ACGS assessment results from IICD, with a score of 118.24 and received the predicate "Leadership in Corporate Governance" or Level 5. Based on this score, BNI's business practices as a whole have adopted international standards. The results of the ACGS BNI assessment by IICD in 2025 are as follows:

No.	Assessment Components	Fiscal Year 2024	Fiscal Year 2023
1.	Shareholder Rights and EqualTreatment	18,00	18,00
2.	Sustainability and Resilience	15,00	14,32
3.	Disclosure andTransparency	23,53	23,53
4.	Board of Commissioners and Board of Directors Responsibilities	38,71	38,71
Total Weighted Score (Level 1)		**95,24**	**94,56**
5.	Bonus	25	23
6.	Penalty	(2)	(2)
Total Skor		**118,24**	**115,56**

6. Improving the Quality of GCG Implementation

a) Based on various findings and recommendations from the GCG practice assessment, BNI has established initiatives to address existing weaknesses and thereby continuously improve the quality of GCG implementation, including:

i. Review of guidelines/policies related to Corporate Governance, to be adjusted to external provisions and current best practices, including the Good Corporate Governance (GCG) Policy, Dividend Policy, Board of Directors Charter, Board of Commissioners Charter, Committee Charter, etc

II. Increasing awareness of GCG among all employees through outreach, webinars, inductions, and various tools, including;

a. Annual signing of the Integrity Pact by all employees.
b. GCG induction for new employees joining BNI, including those in the Officer Development Program (ODP), Assistant Development Program (ADP), and BINA BNI.
c. Recitation of the Core Values AKHLAK and Beliefs during Quality Month and morning briefings in each unit.
d. Mandatory e-learning of GCG modules for all employees annually.
e. Webinars on Governance, Risk, and Compliance (GRC), Anti-Fraud Awareness, Gratification Control, and Personal Data Protection, inviting internal and external speakers.
f. Advice against giving or receiving gratuities on religious holidays through internal social media, posters, the website, and digiHC.
g. Periodic Declaration of Gratification and Anti-Bribery by all employees through DigiHC.
h. Implementation of an anti-bribery management system through ISO 37001:2016 certification for the Anti-Bribery Management System (ABMS).

iv. Externalization of GCG to all stakeholders through webinars, posters, company websites, national mass media, and other media outlets, such as controlling gratuities and advising against giving/ receiving gratuities on religious holidays.

7. BNI GCG Roadmap

BNI ensures that all governance practices are aligned with the established roadmap, embedded in every business process, and consistent with the OJK's sustainable finance roadmap and the achievement of the Sustainable Development Goals. To realize sustainable GCG practices, the Board of Commissioners, the Board of Directors, and all BNI employees instill GCG principles as part of the corporate culture through the Vision & Mission, Code of Ethics, Integrity Pact, Work Guidelines, Risk Management, Anti-Gratification Policy, Anti-Bribery Management System (SMAP), and Social and Environmental Responsibility programs. Over the long term, BNI has undertaken various initiatives to strengthen GCG by developing a Sustainable Finance Action Plan (RAKB) that integrates financial, risk, environmental, social, and governance aspects into its business strategy.

General Meeting of Shareholders

The General Meeting of Shareholders (GMS) is the highest organ in the Bank's Governance structure, holding all authority that can be delegated to neither the Board of Commissioners nor the Board of Directors, as stipulated in applicable laws and/or the Bank's Articles ofAssociation.The GMS serves as a platform for shareholders to exercise their rights to express opinions, cast votes, and obtain information related to the Bank, as long as it pertains to the meeting agenda and does not conflict with the interests of the company, while also adhering to the company's Articles ofAssociation and applicable regulations.In addition, the GMS serves is a formal communication medium for Shareholders to express opinions, vote, and obtain information related to the Bank according to the meeting agenda, and serves as a forum for the Board of Commissioners and Directors to submit accountability reports on the implementation of the Bank's duties and performance during the last financial year. All decisions made in the GMS are based on the Bank's interests and are carried out fairly and transparently.

LEGAL BASIS FOR HOLDING A GMS

The implementation of the BNI GMS is carried out with reference to provisions including:

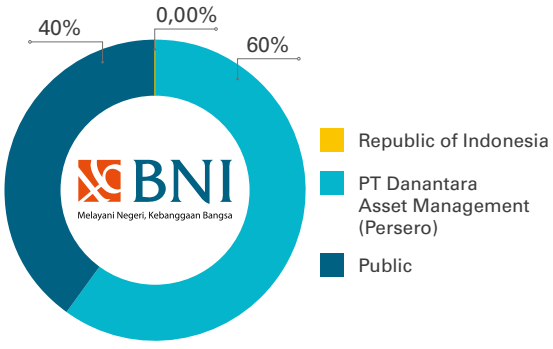
1. Law No. 19 of 2003 concerning State-Owned Enterprises as last amended by Law No. 16 of 2025 concerning the Fourth Amendment to Law No. 19 of 2003 concerning State-Owned Enterprises;
2. Law No. 40 of 2007 concerning Limited Liability Companies as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law;
3. OJK Regulation No. 15/POJK.04/2020 concerning Planning and Implementing General Meeting of Shareholders in Public Companies;
4. OJK Regulation No. 14 of 2025 concerning the Implementation of General Meetings of Shareholders, General Meetings of Bondholders, and General Meetings of Sukuk Holders Electronically;
5. PT Kustodian Sentral Efek Indonesia Board of Directors Decree No. KEP-0016/DIR/KSEI/0420 of 2020 concerning Implementation of the KSEI electronic General Meeting System (eASY.KSEI) Facility as an ElectronicAuthorization Mechanism in the Process of Organizing a GMS for Securities Issuers who are Public Companies and whose shares are kept in KSEI Collective Custody; and
6. Company's Articles of Association.

INFORMATION ON THE ULTIMATE SHAREHOLDER AND BNI'S BENEFICIAL OWNER [ACGS C.1.1]

As a State-Owned Enterprise (BUMN), the Government of Republic of Indonesia owned one Series A Dwiwarna share, representing 0.000%, through the State-Owned Enterprise Regulatory Agency (BP BUMN). Therefore, the Government of the Republic of Indonesia is the Major Shareholder, Controller, and Beneficial Owner of BNI, meaning there are no major or indirect controlling shareholders, down to the individual level, or shareholders acting on behalf of others.

Information on Shareholding of More Than 5% Shares

As of December 31, 2025, PT Danantara Asset Management (Persero) held 5% or more of BNI's issued and fully paid-up shares, with a 60.000% ownership stake, equivalent to 22,378,387,749 (twenty-two billion three hundred seventy-eight million three hundred eighty-seven thousand seven hundred and forty-nine) shares.



General Shareholder Rights

The Bank ensures that the rights of shareholders are always protected, which should increase participationandtheroleofshareholdersorinvestors in the implementation of the Bank's communication program as a public company. All Bank Shareholders, whether Series A Dwiwarna, Series B, or Series C, have equal rights except for the special rights attached to Series A Dwiwarna Shares as stipulated in the Bank's Articles of Association. In general, the rights of BNI shareholders are as follows:

1. Requesting the convening of a GMS.
2. Proposing agenda items for the GMS.
3. Granting a proxy to attend and vote at the GMS.
4. Attending and casting votes in the GMS electronically. [ACGS (B) A.1.1]
5. Having 1 (one) vote for each 1 (one) share.
6. The right to express opinions and vote in the GMS based on one share.
7. Receiving information related to the agenda items and proposed resolutions of the GMS.
8. Receivinganexplanationofthevotingprocedures before the GMS begins.
9. Asking questions on any agenda discussion and on any resolutions made during the GMS.
10. Consulting on issues concerning the fundamental rights of shareholders, as long as it supports the sustainable growth of the Company and enhances its value in the medium to long term, especially for institutional shareholders.
11. Receiving a portion of the Company's profits
12. Receiving material new information/facts, including those available to financial analysts and other similar parties, within the time frame as stipulated by capital market regulations.
13. Receiving information regarding the privileges attached to the Company's share series.
14. Shareholders who do not agree on Mergers, Amalgamations, Acquisitions, or Separations reserve the right to request the Company to buy their shares at their fair prices.The highest share buyback price shall be the average of the share's daily closing prices on the Stock Exchange for the last 90 (ninety) days before the share buyback date as stipulated in Law No. 40 of 2007 concerning Limited Liability Companies, Regulation of the Financial Services Authority of the Republic of Indonesia Number 41/POJK.03/2019 concerning Mergers, Amalgamations, Acquisitions, Integration, and Conversions of Commercial Banks, and Regulation of the Financial Services Authority of the Republic of Indonesia Number 29 of 2023 concerning Share Buybacks issued by Public Companies.

Associated Special Rights

Until the end of 2025, the Republic of Indonesia acted as the Majority Shareholder of BNI with ownership of 60% or equivalent to 22,378,387,750 shares, as well as the holder of Series A Dwiwarna Shares. The Series A Dwiwarna Shares have special rights that are not owned by other shareholders, including: [ACGS A.2.2, A.5.1]

1. The right to agree at the GMS on the following matters:
   a. Approval for amendments to the Articles of Association;
   b. Approval for changes in Capital;
   c. Approval for the appointment and dismissal of members of the Board of Directors and Board of Commissioners; [ACGS A.2.2]
   d. Approval for mergers, consolidations, acquisition, splits and dissolutions;
   e. Approval for remuneration for members of the Board of Directors and Board of Commissioners; [ACGS A.2.1]
   f. Approval for the transfer of assets based on the Articles of Association, requiring the approval of the GMS;
   g. Approval for participation and reduction in the percentage of equity participation in other companies based on the Articles of Association, requiring the approval of the GMS;
   h. Approval for the use of profits;
   i. Approval for non-operational investment and long-term financing based on the Articles of Association, requiring the approval of the GMS;
2. The right to propose Candidates for Members
3. The right to propose GMS agenda;
4. The right to request and access company data and documents in which the mechanism to use such rights is in accordance with the provisions in the Article of Association and regulations.

Except for the above-mentioned privileges, holders of Series B and Series C shares have the same rights, while still observing the provisions of the Company's Articles of Association regarding Quorum, Voting Rights, and Decisions in the GMS. BNI always guarantees the fulfillment of Shareholders' rights in accordance with applicable regulations and ensures fair and equal treatment for all Shareholders, including in the implementation of the buyback of Bank shares.

FAIR TREATMENT OF SHAREHOLDERS

BNI consistently upholds the principle of equality by providing fair treatment to all Shareholders. This commitment is realized through the following initiatives:

1. Ensures that all shareholders of the same series are treated equally, through:
   a. Transparency of shareholders' rights to receive share of profits through the disclosure of the dividend payout ratio target, as disclosed in this Annual Report in the Management Discussion and Analysis chapter on the Company's Performance, page 339. [ACGS A.1.1]
   b. Disclosure of information regarding the rights attached to all series of shares. This is included in the Company's Articles of Association, which are published on the Company's website.
   c. In the case of an agenda item in the GMS regarding changes to rights on shares of a certain series, higher quorum requirements for attendance and decisions are applied, and approval must be obtained from shareholders of the negatively impacted series.
   d. Disclosure of the ultimate beneficial owners as disclosed in this Annual Report in the Corporate Governance chapter under the General Meeting of Shareholders section, Page 673.
   e. Disclosure of the provision that each shareholder has 1 (one) vote, as stated in the Company's Articles of Association, which can be accessed on the Company's website.
2. Ensures that related party transactions are approved and executed after managing potential conflicts of interest and protecting the interests of the Company and its shareholders, as disclosed in this Annual Report in the Management Discussion and Analysis chapter on the Company's Performance, discussing Material Transactions Containing Conflicts of Interest and/or Transactions with Affiliates/Related Parties, page 414.
3. The Company has a policy to prevent insider trading, as disclosed in the 2025 Annual Report.

POLICY ON SHAREHOLDER RELATIONS

BNI consistently applies the principles of corporate governance according to the highest standards, particularly in upholding the aspect of transparency. To realize transparency, the Bank always provides clear, credible, and timely information to all parties, including minority and foreign Shareholders, regarding both financial and non-financial performance. The Corporate Secretary plays an active role in implementing information disclosure as stipulated in Article 5 of OJK Regulation No. 35/POJK.04/2014 concerning Corporate Secretaries of Issuers or Public Companies. In addition, in order to strengthen relations with shareholders in an intensive, systematic, and planned manner, BNI has an internal policy governing its relationship with shareholders.

SHAREHOLDERS' ACCESS TO INFORMATION [ACGS A.4.1]

BNI provides various communication channels accessible to Shareholders and the general public to obtain clear, accurate, and accountable up-to-date information. These communication channels include:

Access to Information for Shareholders

Media	Description
GMS	Media for delivering reports and information to enable shareholders to participate in decision making.
Website	BNI : www.bni.co.id IDX : www.idx.co.id (*ticker code*: BBNI) KSEI : www.ksei.co.id
Print Media	Print media through national and international news/newspapers, magazines, etc. to convey the latest information about the Company.
Electronic Media	Electronic media through national and international newsTV, radio, news portals, etc. to convey the latest information about the Company.
Social Media	𝕏 @bni BNI BNI - Bank Negara Indonesia @bni46 @BNI46

PROVISIONS ON THE CONVENING OF THE GMS

Time and Place of GMS Convening

In accordance with the Articles of Association, BNI holds two types of GMS: the Annual GMS and other GMS (Extraordinary GMS). As a state-owned enterprise (SOE) with public company status, BNI is required to hold the Annual GMS no later than 6 (six) months after the end of the fiscal year, or in accordance with the provisions set by the OJK under certain circumstances. An Extraordinary GMS may be held at any time as needed for the benefit of the Company. The GMS shall be held within the territory of the Republic of Indonesia, with the location provisions as stipulated in applicable laws and regulations, as follows:

1. The domicile of BNI;
2. The place where BNI conducts its main business activities;
3. The capital city of the province where BNI's domicile or main business activities are located; or
4. The province where the stock exchange listing BNI's shares is located.

Procedures for Convening the GMS

BNI always ensures that the Annual GMS and Extraordinary GMS are held in accordance with applicable procedural provisions by upholding the principles of good corporate governance and compliance with laws and regulations. All processes of GMS shall refer to (1) OJK Regulation No. 15/POJK.04/2020 concerning the Plan and Organization of General Meetings of Shareholders of Public Companies; (2) OJK Regulation No. 14 of 2025 concerning the Implementation of General Meetings of Shareholders, Bondholders Meetings, and Sukukholders Meetings Conducted Electronically; and (3) The Bank's Articles of Association, the organization of the Annual GMS and Extraordinary GMS of BNI must comply with the following procedural requirements:

1. Notify OJK of the meeting agenda no later than 5 (five) working days before the announcement of the GMS, excluding the date of the GMS announcement;
2. Announce the GMS to shareholders no later than 14 (fourteen) days before the GMS call, excluding the date of the announcement and the date of the call;
3. Provide shareholders with the opportunity to propose meeting agenda items in writing to the Company. The shareholder(s) proposing the agenda must be 1 (one) shareholder or more, representing 1/20 (one-twentieth) or more of the total shares with voting rights. Agenda proposals must be submitted to the Company no later than 7 (seven) days before the GMS notice date; [ACGS A.2.15]
4. Issue the GMS notice to shareholders no later than 21 (twenty-one) days before the date of the GMS, excluding the date of the notice and the date of the GMS. The notice must include the reasons and/or explanations for each agenda item requiring GMS approval; and [ACGS A.2.13, A.2.14, (B)A.2.1]
5. Disclose detailed profiles of the members of the Board of Directors and the Board of Commissioners, which must at least include information about their age, academic qualifications, first appointment date, experience, and positions in other public companies, in the nomination/re-election process. [ACGS A.6.3]

Meanwhile, the announcement and summons of the GMS to Shareholders must be carried out at least through: [ACGS (B) A.1]

1. The e-GMS service provider's website;
2. The Stock Exchange website; and
3. BNI's website, in both Indonesian and a foreign language, with the foreign language used at least being English. [ACGS A.6.2]

Throughout 2025, BNI held 1 (one) GMS, and its implementation has met the procedures for Notification, Announcement, and GMS Notice, with the following details:

a. Annual General Meeting of Shareholders for the 2024 Financial Year

Description	Date	Letter of Delivery	Means of Delivery
Notification to OJK	January 23, 2025	Letter Number CSE/7/0525	Financial Services Authority and Indonesia Stock Exchange
Announcement	February 04, 2025	Letter Number CSE/7/0717	The Indonesia Stock Exchange website; BNI website; and KSEI website.
Announcement of Changes to the Annual GMS Schedule	February 17, 2025	Letter Number CSE/7/1070	
Invitation ACGS (B) A.1.1, (B) A.2.1]	March 04, 2025	Letter Number CSE/7/1503	

b. Extraordinary GMS 2025

Description	Date	Letter of Delivery	Means of Delivery
Notification to OJK	October 30, 2025	Letter Number CSE/7/7839	Financial Services Authority and Indonesia Stock Exchange
Announcement	November 6, 2025	Letter Number CSE/7/8067	The Indonesia Stock Exchange website; BNI website; and KSEI website.
Invitation ACGS (B) A.1.1, (B) A.2.1]	November 21, 2025	Letter Number CSE/7/8536	

The procedure for convening the GMS implemented by BNI as a state-owned bank in Indonesia refers to the provisions of Article 38 paragraph (7) of the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 on the Governance and Human Resources of State-Owned Enterprises, which stipulates that a public SOE must submit the curriculum vitae (CV) of the proposed candidates for members of the Board of Commissioners and/or the Board of Directors to be appointed in the GMS. This information must be available and announced at the time of the GMS before any decision is made regarding the appointment of such candidates as members of the Board of Commissioners and/or the Board of Directors of the Bank.

Information related to the stages of BNI's GMS implementation can be accessed via the website: https://www.bni.co.id/id-id/perseroan/tatakelola/rups. [ACGS A.6.5]

Agenda Materials for the GMS

BNI provides an opportunity for shareholders or their proxies to submit questions and/or comments. All questions and/or comments submitted are then documented in the GMS minutes and published on BNI's website. Below is a description of the Agenda Materials for the GMS: [ACGS A.2.5]

1. The Agenda Materials for the GMS are documents containing the agenda items, accompanied by the legal basis and relevant explanations for each agenda item;
2. The Company is required to provide the agenda materials for the meeting to shareholders, which can be accessed and downloaded through the Company's website and/or e-GMS.These agenda materials must be available from the date the GMS notice is issued until the GMS is held;
3. In the case of agenda items involving changes to the Company's management, the curriculum vitae of the proposed candidates for members of the Board of Commissioners and the Board of Directors of the Public SOE, to be appointed in the GMS, must be available and announced at the time of the GMS, before any decision is made regarding their appointment.This is in accordance with the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning the Governance and Human Resources of State-Owned Enterprises; and
4. During the GMS, shareholders are entitled to receive information regarding the meeting agenda and the related materials as long as they do not conflict with the interests of the Company. The GMS held by BNI throughout 2025 has followed all the necessary procedures, including Notification, Announcement, and Notice of the GMS.

GMS Code of Conduct

The rules of procedure for holding the BNI GMS are as follows:

1. The GMS Code of Conduct is implemented based on OJK Regulation No. 15/POJK.04/2020 concerning the Plan and Organization of General Meetings of Shareholders of Public Companies; OJK Regulation Number 14 of 2025 concerning the Implementation of General Meetings of Shareholders, General Meetings of Bondholders, and General Meetings of Sukuk Holders Electronically ("POJK 14/2025");
2. The GMS Code of Conduct is distributed to shareholders or their proxies during registration;
3. The rules of procedure for the GMS regulate, among other things, meeting participants who are entitled to attend the GMS, the meeting chair, the language used in the GMS, invitations to other parties by the Company, the quorum for holding meetings and making decisions, meeting mechanisms, question and answer and response mechanisms, decision-making mechanisms, and voting procedures, live broadcasts of the meeting;
4. The key points of the GMS Code of Conduct are read out before the GMS begins; [ACGS A.2.4] and
5. In accordance with the provisions of the GMS Code of Conduct as outlined in the Company's Articles of Association, during the opening of the GMS, the meeting chairperson provides an explanation to shareholders regarding:
   a. A brief overview of the Company's general condition;
   b. The agenda items of the GMS;
   c. The decision-making mechanisms related to the agenda items; and
   d. The procedures for shareholders to exercise their rights to submit questions and/oropinions.

Attendance of Shareholders and Other Parties in the GMS

Referring to the provisions of Article 23 paragraph (1) of OJK Regulation No. 15/2020 concerning the Plan and Organization of General Meetings of Shareholders of Public Companies, shareholders, either in person or represented by proxy, have the right to attend the GMS. Shareholders entitled to attend the GMS are those whose names are listed in the shareholder registry of the public company 1 (one) business day before the notice of the GMS.

Granting of Power of Attorney, Electronic Power of Attorney, and Opportunity to Submit Questions and/or Responses

Based on the provisions of POJK No. 15/2020, Shareholders have the right to attend the GMS in person or through written authorization. In the voting process, each Shareholder is required to cast votes for all of the shares they own, with the provision that they are not permitted to grant power of attorney to more than one proxy for some shares with different votes. In the voting process, Shareholders who are unable to attend in person can still participate through the eASY.KSEI electronic facility.The electronic voting mechanism, both at the Annual GMS and the Extraordinary GMS, is carried out securely, in real-time, and in absentia. [ACGS (B).A.1.1]

In order to protect the rights of Shareholders, BNI provides equal space and opportunity for every Shareholder to ask questions and/or provide responses during the holding of the GMS, with the following provisions: [ACGS A.2.5]

1. Only shareholders or their proxies who have registered for the GMS are entitled to ask questions and/or provide responses during the meeting;
2. The question and/or response forms will be provided to the shareholders or their proxies during the GMS registration;
3. After the Chairperson of the GMS or the person designated by the Chairperson of the GMS presents proposals regarding matters to be decided at the GMS, the Chairperson of the GMS will give shareholders or their proxies the opportunity to ask questions and/or provide responses before a vote is held on the matter in question; and
4. For Shareholders or their proxies who wish to ask questions and/or provide responses, the Chairperson of the GMS invites shareholders/proxies to submit their questions and/or responses in writing, stating their name and the number of shares owned or represented. The questions and/or responses must directly relate to the agenda item being discussed at the GMS.

All questions and/or responses from Shareholders during the GMS are properly documented in the Minutes of the GMS and published on BNI's official website. [ACGS A.2.5]

Bank's Efforts to Increase Shareholder Attendance at the General Meeting of Shareholders (GMS) [ACGS A.4.1]

BNI facilitates shareholders in exercising their rights and authority to make decisions at the GMS. To encourage active shareholder participation in the GMS, BNI has implemented a series of efforts, as follows:

1. The Bank provides an electronic proxy alternative for shareholders to attend and vote in the GMS. The electronic proxy is carried out through the e-RUPS system provided by KSEI. Shareholders can specify their voting preferences for each agenda item in the electronic proxy.
2. The Bank issues timely Announcements and Notices of the GMS in both Indonesian and English, which are published on the e-RUPS provider's website, the company's website, and the Indonesia Stock Exchange (IDX) website;
3. In the Announcement and Notice of the GMS, the Bank clearly outlines which shareholders are authorized to attend/represent and vote in the GMS, namely shareholders whose names are listed in the Company's Shareholder Register or shareholders with securities accounts at PT Kustodian Sentral Efek Indonesia on the date of the notice;
4. On the website, the Bank provides contact details that shareholders can use to communicate regarding the GMS; and
5. The Company provides services to shareholders who need information and/or wish to ask questions related to the GMS plan and/or the agenda items of the GMS, either through direct meetings or correspondence via e-mail.

Quorum Requirements for Attendance and Decisions at the General Meeting of Shareholders (GMS)

A. Quorum for Attendance [ACGS D.3.4]

The GMS is declared valid and can be held if attended by Shareholders representing more than ½ (one half) of all shares with valid voting rights, unless otherwise specified in the laws and regulations or the Articles of Association. Based on the Articles of Association of BNI, the holding of the GMS with the agenda of changing the composition of the Board of Directors and

the Board of Commissioners must be attended by the Series A Dwiwarna Shareholder and other Shareholders and/or their authorized proxies, with the presence of at least ½ (one half) of the shares entitled to vote. Meanwhile, the GMS with the agenda of changing the Articles of Association can only be held if it obtains approval from the Series A Dwiwarna Shareholder together with other Shareholders and/or their authorized proxies, with a total attendance of at least 2/3 (two thirds) of all shares entitled to vote present.

B. Decisions of the General Meeting of Shareholders (GMS)

In accordance with the provisions of OJK Regulation No. 15/POJK.04/2020 concerning the Planning and Implementation of General Meetings of Shareholders of Public Companies and OJK Regulation No. 16/POJK.04/2020 concerning the Electronic Implementation of General Meetings of Shareholders of Public Companies, BNI's GMS throughout 2025 was implemented in accordance with all applicable procedural provisions, including the stages of Notification, Announcement, and GMS Invitation.

All decisions in the GMS are made through deliberation to reach consensus. Each resolution is decided separately to maintain clarity of the agenda and avoid merging issues. If consensus is not reached, decisions are made through a voting mechanism while still adhering to the provisions of the attendance quorum and decision-making quorum of the GMS, where the approval of more than ½ (one half) of the shares present is required for a decision to be declared valid. All decisions made in the GMS are announced to the public no later than the next business day as stipulated in the applicable laws and regulations. [ACGS A.6.1, E.3.4]

Implementation of the One-Share-One-Vote Principle

BNI implemented the One Share One Vote principle in the decision-making and voting process at the 2025 Annual General Meeting of Shareholders (AGMS) held on March 26, 2025, and the 2025 Extraordinary General Meeting of Shareholders (EGMS) held on December 15, 2025. In accordance with the BNI Annual General Meeting of Shareholders (AGMS) Rules of Procedure, the Bank permitted the use of in-absentia voting and prioritized decision-making through polls, rather than by show of hands, for all resolutions at the 2025 Annual General Meeting of Shareholders (AGMS) and the 2025 Extraordinary General Meeting of Shareholders (EGMS). All provisions regarding the voting mechanism in the GMS have been published on the Company's website 21 days prior to the GMS. In compliance with POJK 15/2020, the Rules of Procedure for the GMS are also distributed to shareholders attending the meeting, and the key points of the Rules of Procedure are read out before the GMS begins. [ACGS A.2.9, A.2.10]

Parties That Validate the Voting Results [ACGS A.2.11]

In conducting the GMS, BNI involves independent and professional parties to ensure fairness, transparency, and validity of the implementation and decision-making process. These independent parties include:

1. **Notary**
   A Notary is a public official authorized to prepare an authentic deed with other authorities as referred to in Notorial Law, and who is registered with OJK as a capital market supporting profession. The Notary's role is to examine the validity of supporting documents, and the formality requirements for the GMS, to ensure they do not conflict with the laws and regulations and articles of association.

2. **Share Register Bureau**
   The Share Register Bureau is a party contracted with the company/issuer to record the securities ownership and distribution of rights related to securities.The Share Register Bureau assists the company/issuer in concerning the GMS, by:
   a. Preparingproxiesfromminorityshareholders;
   b. Publishing Written Confirmation for Meetings (KTUR);
   c. Validating shareholders who are entitled to attend the GMS and registering them;
   d. Calculating shareholders presence in connection with the GMS quorum;
   e. Providing voting cards for shareholders;
   f. Helping the Notary in calculating votes using a barcode scanner.

IMPLEMENTATION OF THE 2025 GMS

In 2025, BNI held two General Meetings of Shareholders (GMS): the Annual GMS (AGMS) for

the 2024 Fiscal Year, held on Wednesday, March 26, 2025, and the Extraordinary GMS (EGMS) for the 2025 Fiscal Year, held on Monday, December 15, 2025, both physically and electronically through the eASY. KSEI system. The entire GMS process was conducted in accordance with applicable laws and regulations, including the dissemination of information regarding the GMS agenda, notifications, announcements, summons, and publication of the GMS resolutions, which were announced on BNI's official website (www.bni.co.id), the Indonesia Stock Exchange website (www.idx.co.id), and the KSEI website (www.ksei.co.id). [ACGS (B) A.1.1]

The following is detailed information regarding the holding of the 2025 BNI AGM:

Day, Date and Time	Wednesday, March 26, 2025 10:26 AM – 12:22 PM WIB
Lokasi	Ballroom Menara BNI, 6th floor Jalan Pejompongan Raya No. 7 Bendungan Hilir, Jakarta
Quorum	Shareholders and/or their proxies present, either in the Meeting room or electronically through the KSEI Electronic General Meeting System (hereinafter referred to as "eASY.KSEI"), hold a total of 32,719,558,266 shares, including Series A Dwiwarna shares, or 87.7263151% of the total number of shares with valid voting rights issued by the Company as of the Meeting date, namely 37,297,312,916 shares, consisting of: • 1 Series A Dwiwarna share; • 578,683,733 Series B shares; and • 36,718,629,182 Series C shares; by taking into account the Company's Shareholder List as of March 3, 2025 until 16.00 Western Indonesian Time, therefore the quorum required in Article 4 1 paragraph (1) letter a and Article 42 letter a of the Financial Services Authority Regulation number 15/POJK.04/2020 concerning the Planning and Implementation of General Meetings of Shareholders of Public Companies ("POJK 15") in conjunction of the Company's Articles of Association has been fulfilled and the Meeting is valid and has the right to make valid and binding decisions regarding the matters discussed in accordance with the agenda of the Meeting.
Chairman of the AGMS	The meeting was chaired by Mr. Pahala Nugraha Mansury as Vice President Commissioner, in accordance with the letter of the Board of Commissioners Number DK/30 dated March 13, 2025.
Attendance of member of the Board of Commissioners including the President Commissioner [ACGS A.2.7, A.2.8]	The meeting was attended by all members of the Board of Commissioners. • President Commissioner/Independent Commissioner: Pradjoto • Vice President Commissioner: Pahala Nugraha Mansury • Independent Commissioner: Sigit Widyawan • Commissioner: Askolani • Independent Commissioner: Asmawi Syam • Independent Commissioner: Iman Sugema • Independent Commissioner: Septian Hario Seto • Independent Commissioner: Erwin Rijanto Slamet • Commissioner: Fadlansyah Lubis • Commissioner: Robertus Billitea • Commissioner: Mohamad Yusuf Permana
Attendance of member of the Board of Directors, including the President Director [ACGS A.2.7, A.2.8]	The meeting was attended by all members of the Board of Directors. • President Director: Royke Tumilaar • Deputy President Director: Putrama Wahju Setyawan • Retail Banking Director: Corina Leyla Karnalies • Risk Management Director: David Pirzada • Network and Services Director: Ronny Venir • Technology and Operations Director: Toto Prasetio • Enterprise and Commercial Banking Director: I Made Sukajaya • Digital & Integrated Transaction Banking Director: Hussein Paolo Kartadjoemena • Wholesale & International Banking Director: Agung Prabowo • Institutional Director: Munadi Herlambang*)
Independent vote counters [ACGS A.2.11]	The vote counting for the decision-making basis of the meeting was conducted by PT Datindo Entrycom as the Securities Administration Bureau. Subsequently, the votes were validated by Ashoya Ratam, S.H., M.Kn, a Notary in Jakarta.
Attendance of member of the Audit Committee, including the Chairman of Audit Committee	• Chairman: Asmawi Syam - Independent Commissioner • Member: Sigit Widyawan - Independent Commissioner • Member: Iman Sugema - Independent Commissioner • Member: Suhendi Muharam - Independent Party • Member: Human Brilianto - Independent Party

Attendance of the Chairman of the Nomination and Remuneration Committee	The Chairman of the Nomination and Remuneration Committee, Pradjoto – President Commissioner/ Independent Commissioner of BNI, attended the 2024 Financial Year Annual General Meeting of Shareholders.
Number of shareholders who raised questions and/ or opinions	All shareholders are given the opportunity to ask questions and/or provide opinions on each agenda item of the AGMS. There were a total of 7 (seven) shareholders who asked questions at the 2025 AGM.

***) Not yet effective.**

Methods and Procedures for the 2025 Annual General Meeting of Shareholders for the 2024 Financial Year

As a public company, all stages of the implementation of the 2025 BNI Annual General Meeting of Shareholders (AGMS) have been carried out in accordance with the provisions of POJK 15/2020, with the following details:

Description	Date	Notes
Annual GMS Notification to Regulator (OJK)	January 23, 2025	It was submitted to the OJK through the Company's Letter No. CSE/7/0525 dated January 23, 2025, regarding the Notification of the 2024 Financial Year Annual General Meeting of Shareholders and the Provisional Meeting Agenda of PT Bank Negara Indonesia (Persero) Tbk, submitted to the Financial Services Authority and the Indonesian Stock Exchange.
Announcement of the Annual GMS to Shareholders	February 4, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/0717 dated February 4, 2025. The notice for the Annual General Meeting of Shareholders (AGMS) is also delivered through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Announcement of Changes to the Annual GMS Schedule to Shareholders	February 17, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/1070 dated February 17, 2025. The notice for the Annual General Meeting of Shareholders (AGMS) is also delivered through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Proposed Agenda for the Annual GMS by Shareholders	February 25,2025	In accordance with the provisions of Article 16 paragraph (2) of POJK, GMS by Shareholders shareholders, either individually or collectively, representing 1/20 (one-twentieth) or more of the total shares of the Company, are entitled to submit proposals related to the Meeting Agenda, including adding items to the agenda. Such proposals must be submitted in writing to the Board of Directors of the Company, as the organizer of the GMS, no later than 7 (seven) days before the Meeting Notice date, which is Tuesday, February 25, 2025 at 16.00 WIB. That there is a Series A Dwiwarna Shareholder who proposed the agenda of the Meeting through the Letter of the Minister of State-Owned Enterprises of the Republic of Indonesia Number SR-58/MBU/02/2025 dated February 10, 2025 regarding the Approval of the Holding of the Annual General Meeting of Shareholders for the 2024 Financial Year.
Recording Date for List of Shareholders Entitled to Attend the Annual GMS	March 3, 2025	Shareholders who are entitled to attend/represent and vote in the meeting are BNI shareholders whose names are registered in the BNI Shareholder Register or shareholders in securities accounts at PT Kustodian Sentral Efek Indonesia (KSEI) as of Monday, March 3, 2025 until 16.00 WIB.
Invitation and Information on the Annual GMS Agenda [ACGS A.2.13, (B) A.1]	March 4, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/1503 dated March 4, 2025. The invitation to the Annual General Meeting of Shareholders (AGMS) is also delivered through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Implementation of the Annual GMS	March 26, 2025	The meeting was held both physically and electronically in accordance with POJKNo.16/ POJK.04/2020 regarding the Electronic Implementation of General Meetings of Shareholders of Public Companies, with PT Kustodian Sentral Efek Indonesia as the e-RUPS provider through the eASY.KSEI application. The physical meeting was held at the Ballroom of Menara BNI, 6th Floor, Jalan Pejompongan Raya No. 7, Bendungan Hilir, Jakarta.
Annual GMS Minutes Summary	March 26, 2025	The results of the 2024 Annual General Meeting of Shareholders have been formalized through the Deed of the Minutes of the Annual General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 36 dated March 26, 2025.

Description	Date	Notes
Annual GMS Minutes Summary [ACGS A.2.12]	March 27, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/2206 dated March 27, 2025. Publication of the Summary of Minutes of the Annual General Meeting of Shareholders (AGMS) is also available through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Submission of the Deed of the Annual GMS Minutes to Regulators	April 23, 2025	BNI has submitted the Deed of the Minutes of the 2025 Financial Year Annual General Meeting of Shareholders No. 36 dated March 26, 2025, made before Ashoya Ratam, S.H., M.Kn, a Notary in Jakarta, through the Company's Letter No. CSE/7/2627 dated April 23, 2025.

Decision-Making Mechanism for the 2025 AGMS For the 2024 Financial Year [ACGS D.3.4]

Referring to the quorum provisions set forth in POJK 15/2020 and the Bank's Articles of Association, decisions in the meeting are made based on deliberation to reach a consensus. If a consensus is not reached, the decision will be made through a voting method.The voting mechanism for decision-making in the meeting is as follows:

1. For the First and Fourth Meeting Agenda, the Meeting is attended by Shareholders or their authorized Proxies who together represent more than 1/2 (one half) of the total number of shares with valid voting rights, and the decision is valid if approved by more than 1/2 (one half) of the total number of shares with valid voting rights present at the Meeting.
2. For the Second, Third, and Seventh Meeting Agenda, the Meeting is attended by Series A Dwiwarna Shareholders and other Shareholders and/or their authorized Proxies who together represent more than 1/2 (one half) of the total number of shares with valid voting rights, and the decision is valid if approved by Series A Dwiwarna Shareholders and other Shareholders and/or their authorized Proxies who together represent more than 1/2 (one half) of the total number of shares with valid voting rights who are present at the Meeting.
3. For the Fifth and Sixth Meeting Agenda, the Meeting is attended by Series A Dwiwarna Shareholders and other shareholders and/or their authorized representatives who together represent at least 2/3 (two thirds) of the total number of shares with valid voting rights and the decision is valid if approved by Series A Dwiwarna Shareholders and other shareholders and/or their authorized proxies who together represent more than 2/3 (two thirds) of the total number of shares with valid voting rights who are present at the Meeting.

Minutes of Resolutions of the 2025 AGM dated March 26, 2025

All resolutions, questions, and responses raised at each agenda item of the 2025 Annual General Meeting of Shareholders (AGMS) for Financial Year 2024 have been duly addressed and/or accommodated by BNI and were recorded in Deed No. 36 dated March 26, 2025, drawn up before Ashoya Ratam, S.H., M.Kn., Notary in the Administrative City of South Jakarta. Explanations and rationales for each agenda item requiring shareholder approval are fully accessible on BNI's website at https://www.bni.co.id/id-id/perseroan/tata-kelola/rups. The details of the AGMS resolutions for Financial Year 2024 are as follows:

Agenda I	Approval of the Annual Report and Ratification of the Consolidated Financial Statements of the Company, Approval of the SupervisoryTask Report of the Board of Commissioners, as well as the Ratification of the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2024 Financial Year, along with the full acquittal and discharge of responsibility (volledig acquit et de charge) to the Board of Directors for the management of the Company and the Board of Commissioners for the supervision of the Company carried out during the 2024 Financial Year.		
Number of Shareholders' Inquiries [ACGS A.2.5]	There was 1 (one) person who submitted a response and 2 (two) questions from shareholders or their representatives/proxies.		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32.382.865.648 shares, or 98,9709744% of the total shares with valid voting rights present at the meeting.	11.544.012 shares, or 0,0352817% of the total shares with valid voting rights present at the meeting.	325.148.606 shares, or 0,9937439% of the total shares with valid voting rights present at the meeting.

Meeting Resolutions [ACGS A.6.1]	1. Approved the Company's Annual Report including Report of the Board of Commissioners' Supervisory Duties for the Fiscal Year 2023 ended on December 31, 2024. 2. Ratified: a. The Company's Consolidated Financial Statements for the 2023 Financial Year, which ended on December 31, 2023, audited by the Public Accounting Firm Rintis, Jumadi, Rianto & Partner (a member firm of the PricewaterhouseCoopers Global network), in accordance with Report No. 00030/2.1457/AU.2/07/1124-1/0/I/2025 dated February 05, 2025 with a fair opinion in all material respects, and b. The Financial Report of the Micro and Small Business Funding Program (PUMK) for the fiscal Year 2024 which ended on December 31,2024, audited by the Public Accounting Firm Rintis, Jumadi, Rianto & Partner (a member firm of PricewaterhouseCoopers Global Network) in accordance with Report No 00030/2.1457/AU.2/07/1124- 1/0/II/2025. dated February 05, 2025 with a fair opinion in all material respects.
	3. With the approval of the Company's Annual Report, including the Supervisory Task Report of the Board of Commissioners, and the ratification of the Company's Consolidated Financial Statements, as well as the Financial Statements of the Micro and Small Business Funding Program (PUMK), all for the 2024 Financial Year ending on December 31, 2024, the AGMS grants full acquittal and discharge of responsibility (volledig acquit et de charge) to all members of the Board of Directors for the management of the Company and the members of the Board of Commissioners for the supervision of the Company conducted during the 2024 Financial Year ending on December 31, 2024, provided that such actions are not criminal in nature and are reflected in the above-mentioned reports.
Follow-up on the Meeting's Decision	The decisions were immediately effective
Realization	Already realized

Agenda II	Approval of the Use of the Company's Net Profit for the Fiscal Year 2024.		
Number of Shareholders' Inquiries [ACGS A.2.5]	There is 1 (one) person who submits a response from the Shareholder or their representative/proxy		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32.307.648.221 shares, or 98,7410892% of the total shares with valid voting rights present at the meeting.	99.683.021 shares, or 0,3046588% of the total shares with valid voting rights present at the meeting.	312.227.024 shares, or 0,9542520% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions [ACGS A.6.1]	1. 65% (sixty five percent) or an amount of Rp. 13,951,339,037,618.90 (thirteen trillion nine hundred fifty one billion three hundred thirty nine million thirty seven thousand six hundred eighteen point nine zero Rupiah) or an amount of Rp. 374.05748422250 (three hundred seventy four point zero five seven four eight four two two five zero Rupiah) per share is designated as a Cash Dividend. The payment will be carried out under the following terms: a. Dividends of the Republic of Indonesia's share amounting to Rp8,370,803,422,720.61 (eight trillion three hundred seventy billion eight hundred three million four hundred twenty two thousand seven hundred twenty point six one rupiah) are paid to the account designated by the Minister of State-Owned Enterprises. b. The dividend for the 2023 financial year will be paid proportionally to each shareholder whose name is listed in the Shareholder Register on the Recording Date. c. The Board of Directors is granted the authority and power, with the right of substitution, to carry out the following: i. Establish the schedule and procedures for the distribution related to the payment of the dividend for the 2023 financial year in accordance with applicable regulations. ii. Deduct dividend taxes in accordance with the prevailing tax regulations. iii. Address other technical matters in accordance with applicable regulations. 2. 35% (thirty five percent) or an amount of Rp. 7,512,259,481,794.79 (seven trillion five hundred twelve billion two hundred fifty nine million four hundred eighty one thousand seven hundred ninety four point seven nine Rupiah) will be used as Retained Earnings.		
Follow-up on the Meeting's Decision [ACGS A.1.1]	BNI has distributed the Cash Dividend to Shareholders on April 25, 2025.		
Realization	Already realized.		

Agenda III [ACGS A.2.1]	Determination of Remuneration (Salary/Honorarium, Facilites, and Benefits) for 2025 and Tantiem for Fiscal Year 2024 for the Company's Board of Directors and Board of Commissioners.		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6, D.3.12]	**Agree**	**Disagree**	**Abstain**
	30,678,385,445 shares, or 93.7616125% of the total shares with valid voting rights present at the meeting	1,707,490,047 shares, or 5.2185608% of the total shares with valid voting rights present at the meeting	333,682,774 shares, or 1.0198266% of the total shares with valid voting rights present at the meeting
Meeting Resolutions*) [ACGS A.2.1, A.6.1, D.3.12]	1. Approved the granting of power and authority to the Series A Dwiwarna Shareholders to determine for the members of the Board of Commissioners: a. Bonus/Performance Incentive/Special Incentive for Fiscal Year 2024 and/or Long-Term Incentive for the 2025-2027 Period, in accordance with applicable regulations; and b. Honorarium, including Facilities and Allowances for Fiscal Year 2025. 2. Approved the granting of power and authority to the Board of Commissioners, with prior written approval from the Series A Dwiwarna Shareholder, to determine for the Board of Directors: a. Bonuses/Performance Incentives/Special Incentives for the 2024 Financial Year and/or Long-Term Incentives for the 2025-2027 Period, in accordance with applicable regulations; and b. Salaries, including facilities and allowances for the 2025 Financial Year.		
Meeting's Decision	The decision is being implemented.		
Realization	In the implementation process		

*) Decisions regarding the approval of remuneration or increases for the Board of Directors and/or Board of Commissioners are made by Series A Dwiwarna shareholders. This is in accordance with the scope of special rights held by Series A Dwiwarna shareholders as stipulated in BNI's Articles of Association.

Agenda IV	Appointment of Public Accountant and/or Public Accounting Firm to Audit the Company's Consolidated Financial Statements and the Micro and Small Business Funding Program (PUMK) Financial Statements for the 2025 Fiscal Year		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,146,209,003 shares, or 98.2476864% of the total shares with valid voting rights present at the meeting	263,328,039 shares, or 0.8048032% of the total shares with valid voting rights present at the meeting	310,021,224 shares, or 0.9475104% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1, A.6.4]	1. Approved the appointment of Public Accountants at the Public Accounting Firm Rintis, Jumadi, Rianto & Rekan (a member firm of the PricewaterhouseCoopers network) who will audit the Company's Consolidated Financial Statements, the Financial Statements of the Micro and Small Business Funding Program (PUMK), and other Reports for the 2025 Financial Year. 2. Approved the granting of power and authority to the Company's Board of Commissioners to: a. Appoint a Public Accountant and/or Public Accounting Firm to audit the Company's Consolidated Financial Statements for other periods in the 2025 Financial Year for the purposes and interests of the Company; and b. Determining the audit fee and other requirements for the Public Accountant and/or Public Accounting Firm, and appointing a Replacement Public Accountant and/or Public Accounting Firm in the event that the Public Accountant and/or Public Accounting Firm of Rintis, Jumadi, Rianto & Rekan (a member firm of the PricewaterhouseCoopers network) is unable, for any reason, to complete the audit services for the Company's Consolidated Financial Statements and/or other periods in the 2025 Financial Year, as well as the Financial Statements of the Micro and Small Enterprise Funding Program (PUMK) for the 2025 Financial Year, including determining the audit fee and other requirements for the Replacement Public Accountant and/or Public Accounting Firm.		
Meeting's Decision	The decision has been implemented		
Realization	has been implemented		

Agenda V	Approval of the Company's Share Buyback Plan (Buyback) and Transfer of Shares Proceeding from the Buyback which are held as Treasury Stock		
Number of Shareholders' Inquiries [ACGS A.2.5]	There is 1 (one) person who submits questions from the Shareholder or their representative/proxy		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	29,339,025,246 shares, or 89.6681581% of the total shares with valid voting rights present at the meeting	310,645,140 shares, or 0.9494173% of the total shares with valid voting rights present at the meeting	310,645,140 shares, or 0.9494173% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	1. Approved the buyback of the Company's shares that have been issued and listed on the Indonesia Stock Exchange in the maximum amount of IDR 1,500,000,000,000 (one trillion five hundred billion Rupiah) including costs related to the buyback of shares by taking into account permits and provisions of laws and regulations. 2. Approving the transfer of shares resulting from the buyback which are held as treasury stock for the implementation of the Employee Share Ownership Program and/or the Board of Directors and Board of Commissioners who meet the requirements to own shares of the Company and/or for other transfers in accordance with the approval of the OJK and the provisions of laws and regulations. 3. Granting power and authority to carry out the repurchase (buyback) of the Company's shares, including the termination of its implementation, to the Company's Board of Directors, while still paying attention to the provisions of laws and regulations. 4. Approved the granting of power and authority to transfer the shares from the Buyback held as treasury stock to: a. The Company's Board of Directors for the Employee Stock Ownership Program and/or other transfers in accordance with OJK approval; b. The Company's Board of Directors, subject to the approval of the Series A Dwiwarna Shareholder for the Board of Directors' Stock Ownership Program and/or the Board of Commissioners; while still observing the provisions of laws and regulations.		
Meeting's Decision	The decision is being implemented		
Realization	The buyback realization is as follows: As of December 31, 2025: 0 shares. As of January 31, 2026: 12,125,600 shares.		

Agenda VI	Changes to the Company's Articles of Association		
Number of Shareholders' Inquiries [ACGS A.2.5]	There is 1 (one) person who submits questions from the Shareholder or their representative/proxy		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	25,624,602,514 shares, or 78.3066883% of the total shares with valid voting rights present at the meeting	6,780,832,793 shares, or 20.7240964% of the total shares with valid voting rights present at the meeting	317,122,959 shares, or 0.9692153% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	1. Approved the amendment to the Company's Articles of Association in order to comply with Financial Services Authority Regulation Number 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks. 2. Agree to re-arrange all provisions in the Company's Articles of Association in connection with the changes as referred to in point 1 (one) above, the attachment of which is the entire articles of association as attached to the minutes of the notarial deed. 3. Granting power and authority to the Board of Directors with the right of substitution to carry out all necessary actions related to the decisions of the Meeting, including but not limited to compiling and restating all of the Company's Articles of Association in a Notarial Deed, adjusting changes to the Company's Articles of Association if this is required by the authorized agency and submitting it to the authorized agency to obtain approval and receipt of notification of changes to the Company's Articles of Association, as well as carrying out everything deemed necessary and useful for this purpose with nothing being excluded.		
Decision	The decision has taken effect and the Company's latest Articles of Association in Deed No. 27 dated April 22, 2025 has been published on the BNI website.		
Realization	Already realized.		

Agenda VII	Approval of the Company's Recovery Plan and Resolution Plan		
Number of Shareholders' Inquiries [ACGS A.2.5]	There is 1 (one) person who submits questions from the Shareholder or their representative/proxy		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	24,686,076,570 shares, or 75.4474629% of the total shares with valid voting rights present at the meeting	7,586,600,205 shares, or 23.1867440% of the total shares with valid voting rights present at the meeting	446,881,491 shares, or 1.3657932% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	1. a. Honorably dismiss the following individuals as members of the Company's Management: 1) Retail Banking Director: Corina Leyla Karnalies 2) President/Independent Commissioner: Pradjoto 3) Independent Commissioner: Septian Hario Seto 4) Independent Commissioner: Iman Sugema 5) Independent Commissioner: Asmawi Syam appointed respectively based on the Resolution of the Annual General Meeting of Shareholders for the 2019 Financial Year dated February 20, 2020 jo. Resolution of the Extraordinary General Meeting of Shareholders for the 2022 Financial Year dated August 31, 2022 jo. Resolution of the Annual General Meeting of Shareholders for the 2022 Financial Year dated March 15, 2023 jo. Resolution of the Annual General Meeting of Shareholders for the 2023 Financial Year dated March 4, 2024, and Resolution of the Extraordinary General Meeting of Shareholders for the 2023 Financial Year dated September 19, 2023, with gratitude for the contribution of energy and thoughts given during their tenure as the Company's Management. b. All actions of the members of the Board of Directors and Board of Commissioners as referred to in point 1 letter a of this Letter, in their position as such from the date of the end of their term of office until the date of the closing of this GMS are declared valid as long as these actions are reflected in the annual report and annual calculations with due observance of the applicable provisions. 2. Confirming the honorable dismissal of the following individuals as members of the Company's Board of Directors: 1) Human Capital and Compliance Director: Mucharom 2) Finance Director: Novita Widya Anggraini appointed respectively based on the Resolution of the 2022 Extraordinary General Meeting of Shareholders dated August 31, 2022 and the Resolution of the 2020 Extraordinary General Meeting of Shareholders dated September 2, 2020 jo. Resolution of the 2022 Extraordinary General Meeting of Shareholders dated August 31, 2022, respectively effective from March 24, 2025, and March 25, 2025, with gratitude for the contribution of energy and thoughts given during their tenure as members of the Company's Board of Directors. 3. Honorably dismiss the following individuals as members of the Company's Management: 1) President Director: Royke Tumilaar 2) Enterprise and Commercial Banking Director: I Made Sukajaya 3) Network and Service Director s: Ronny Venir 4) Risk Management Director: David Pirzada 5) Vice President Commissioner: Pahala Nugraha Mansury 6) Commissioner: Robertus Billitea 7) Independent Commissioner: Sigit Widyawan 8) Independent Commissioner: Erwin Rijanto Slamet 9) Commissioner: Fadlansyah Lubis 10) Commissioner: Mohamad Yusuf Permana 11) Commissioner: Askolani appointed respectively based on the Decision of the Extraordinary General Meeting of Shareholders of 2020 dated September 2, 2020, the Decision of the Annual General Meeting of Shareholders of Fiscal Year 2023 dated March 4, 2024, the Decision of the Extraordinary General Meeting of Shareholders of 2022 dated August 31, 2022, the Decision of the Extraordinary General Meeting of Shareholders of 2023 dated September 19, 2023, the Decision of the Annual General Meeting of Shareholders of Fiscal Year 2022 dated March 15, 2023, the Decision of the Annual General Meeting of Shareholders of Fiscal Year 2020 dated March 29, 2021, effective as of the closing of this General Meeting of Shareholders, with gratitude for the contribution of energy and thoughts given during their tenure as members of the Company's Management.		

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

No.	Originally	Become
1)	Wholesale and International Banking Director	Treasury & International Banking Director
2)	Digital and Integrated Transaction Banking Director	Commercial Banking Director
3)	Retail Banking Director	Consumer Banking Director
4)	Finance Director	Finance & Strategy Director
5)	Enterprise and Commercial Banking Director	Corporate Banking Director
6)	Institutional Banking Director	Institutions Director
7)	Technology and Operations Director	Information Technology Director
8)	Network and Services Director	Network & Retail Funding Director
9)	-	Operations Director

6. To assign the following names as members of the Company's Board of Directors as follows:

No.	Name	Originally	Become
	Putrama Wahju Setyawan	Vice President Director	President Director
	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Finance & Strategy Director
	Munadi Herlambang	Institutional Banking Director	Human Capital & Compliance Director
	Agung Prabowo	Wholesale and International Banking Director	Corporate Banking Director
	Toto Prasetio	Technology and Operations Director	Information Technology Director

each of whom was appointed based on the Decision of the Annual General Meeting of Shareholders for the 2022 Financial Year dated March 15, 2023 in conjunction with the Decision of the Annual General Meeting of Shareholders for the 2023 Financial Year dated March 4, 2024, the Decision of the Extraordinary General Meeting of Shareholders for the 2022 Financial Year dated August 31, 2022, and the Decision of the Annual General Meeting of Shareholders for the 2023 Financial Year dated March 4, 2024, with the remaining term of office continuing the remaining term of office of each in accordance with the Decision of the GMS appointing the person concerned.

8. Appoint the names below as the Company's Management:

	Vice President Director	:	Alexandra Askandar
	Risk Management Director	:	David Pirzada
	Consumer Banking Director	:	Corina Leyla Karnalies
	Operations Director	:	Ronny Venir
	Corporate Banking Director	:	Agung Prabowo
	Network & Retail Funding Director	:	Rian Kaslan
	Treasury & International Banking Director	:	Abu Santosa
	Commercial Banking Director	:	Muhammad Iqbal
	Institutions Director	:	Eko Setyo Nugroho
	President Commissioner/Independent Commissioner	:	Omar Sjawaldy Anwar
	Vice President Commissioner	:	Tedi Bharata
	Commissioner	:	Suminto
	Commissioner	:	Donny Hutabarat
	Independent Commissioner	:	Vera Febyanthy
	Independent Commissioner	:	Didik Junaidi Rachbini

10. The term of office of the members of the Board of Directors and Board of Commissioners appointed as referred to in point 6, is in accordance with the provisions of the Company's Articles of Association, taking into account the laws and regulations in the Capital Market sector and without reducing the right of the GMS to dismiss at any time.
11. With the confirmation of the dismissal, termination, change in the nomenclature of positions, transfer of duties, and appointment of the Company's Management as referred to in number 1, number 2, number 3, number 4, number 5, and number 6, the composition of the Company's Management is as follows:

a. Directors

	President Director	:	Putrama Wahju Setyawan
	Vice President Director	:	Alexandra Askandar
	Risk Management Director	:	David Pirzada
	Treasury & International Banking Director	:	Abu Santosa
	Commercial Banking Director	:	Muhammad Iqbal
	Human Capital & Compliance Director	:	Munadi Herlambang
	Consumer Banking Director	:	Corina Leyla Karnalies
	Finance & Strategy Director	:	Hussein Paolo Kartadjoemena
	Operations Director	:	Ronny Venir
	Corporate Banking Director	:	Agung Prabowo
	Institutions Director	:	Eko Setyo Nugroho
	Information Technology Director	:	Toto Prasetio
	Network & Retail Funding Director	:	Rian Kaslan

b. Board of Commissioners

	President Commissioner/Independent Commissioner	:	Omar Sjawaldy Anwar
	Vice President Commissioner	:	Tedi Bharata
	Commissioner	:	Suminto
	Commissioner	:	Donny Hutabarat
	Independent Commissioner	:	Vera Febyanthy
	Independent Commissioner	:	Didik Junaidi Rachbini

12. Requesting the Board of Directors to submit a written application to the Financial Services Authority for the implementation of a Fit & Proper Test for the members of the Board of Directors and Board of Commissioners appointed as referred to in point 6 by observing the applicable provisions.
13. Members of the Board of Directors and Board of Commissioners appointed as referred to in point 6 who are still holding other positions which are prohibited by statutory regulations from being held concurrently with the position of Director and Board of Commissioners of a State-Owned Enterprise, then the person concerned must resign or be dismissed from that position.
    Granting power of attorney with the right of substitution to the Company's Board of Directors to state the decisions of this GMS in the form of a Notarial Deed and to appear before a Notary or authorized official, and to make necessary adjustments or corrections if required by the authorized party for the purposes of implementing the contents of the meeting's decisions.

Meeting's Decision	The decision has taken effect
Realization	Already realized.

Note:
*) In accordance with the Company's Articles of Association and POJK 15, Shareholders with voting rights who are present at the Meeting but abstain are deemed to have cast the same vote as the majority of the Shareholders who cast the vote. Therefore, according to the calculation system of PT Kustodian Sentral Efek Indonesia (the Indonesian Central Securities Depository) and the Securities Administration Bureau, the number of abstain votes is added to the number of affirmative votes.

Explanation of Each AGMS Agenda that Require Shareholder Approval in the GMS Announcement/ Circular and/or Supporting Statement

All decisions, questions, and responses raised on each agenda item of the 2025 AGMS for the 2024 Financial Year have been addressed and/or accommodated by BNI and are outlined in Deed No. 36 dated March 26, 2025, drawn up before Ashoya Ratam, S.H., M.Kn., Notary in South Jakarta. A complete explanation and rationale for each agenda item that require shareholder approval can be accessed through BNI's website at https://www.bni.co.id/id-id/perseroan/tata-kelola/rups.

Realization of Dividend Payment [ACGS A.1.1]

In connection with Agenda Item II of the Annual GMS for the date March 2025 Fiscal Year regarding the Approval of the Use of Net Profit for the 2024 Fiscal Year, BNI has made a Cash Dividend payment based on the performance of the 2024 Fiscal Year with the following details:

Cash Dividends Distributed (Rp-billion)	Rp13,951,339,037,618.90
Dividends per Share (IDR)	Rp374.05748
Dividend Distribution Ratio from Net Profit for the Year Attributable to Owners of the Parent Entity for Fiscal Year 2024 (%)	65%
Announcement Date	March 27, 2025
Payment Date	April 25, 2025

IMPLEMENTATION OF THE 2025 EXTRAORDINARY GENERAL MEETING OF SHAREHOLDERS (EGMS)

In 2025, BNI held one Extraordinary General Meeting of Shareholders (EGMS) for 2025, which was held on Monday, December 15, 2025, both physically and electronically through the eASY.KSEI system. The entire EGMS process was conducted in accordance with applicable laws and regulations, including the dissemination of information regarding the EGMS agenda, notifications, announcements, summons, and publication of the EGMS resolutions, which were announced on BNI's official website (www.bni.co.id), the Indonesia Stock Exchange website (www.idx.co.id), and the KSEI website (www.ksei.co.id). [ACGS (B) A.1.1]

The following is detailed information regarding the holding of BNI's 2025 EGMS:

Day, Date and Time	Monday, December 15, 2025 3:48 PM – 4:33 PM WIB
Location	Central Jakarta Through the KSEI Electronic General Meeting System ("eASY.KSEI") facility at https://akses.ksei.co.id, provided by PT Kustodian Sentral Efek Indonesia ("KSEI")
Quorum	Shareholders and/or their proxies who were present, both in the Meeting room and electronically, all owned 32,719,558,266 shares including Dwiwarna Series A shares or constituted 87.7263151% of the total number of shares with valid voting rights that had been issued by the Company. By taking into account the Company's Shareholder List as of November 20, 2025 until 16.00 WIB, therefore the quorum required in Article 41 paragraph (1) letter a and Article 42 letter a and Article 45 of the Financial Services Authority Regulation Number 15/POJK.04/2020 concerning the Planning and Implementation of General Meetings of Shareholders of Public Companies ("POJK 15") in conjunction of the Company's Articles of Association has been fulfilled and the Meeting is valid and has the right to make valid and binding decisions regarding the matters discussed in accordance with the agenda of the Meeting.
Chairman of the AGM	The meeting was chaired by Mr. Omar Sjawaldy Anwar as the Main Commissioner/Independent Commissioner, in accordance with the letter of the Board of Commissioners Number DK/131 dated December 2, 2025.
Presence of members of the Board of Commissioners, including the President Commissioner [ACGS A.2.7, A.2.8]	• President Commissioner/Independent Commissioner: Omar Sjawaldy Anwar • Independent Commissioner: Vera Febyanthy • Independent Commissioner: Didik Junaedi Rachbini • Commissioner: Donny Hutabarat
Presence of members of the Board of Directors, including the President Director [ACGS A.2.7, A.2.8]	• President Director: Putrama Wahju Setyawan • Deputy President Director: Alexandra Askandar • Finance & Strategy Director: Hussein Paolo Kartadjoemena • Consumer Banking Director: Corina Leyla Karnalies • Risk Management Director: David Pirzada • Operations Director: Ronny Venir • Information Technology Director: Toto Prasetio • Corporate Banking Director: Agung Prabowo • Commercial Banking Director: Muhammad Iqbal • Network & Retail Funding Director: Rian Eriana Kaslan • Treasury & International Banking Director: Abu Santosa Sudradjat • Institutional Director: Eko Setyo Nugroho • Human Capital & Compliance Director: Munadi Herlambang
Independent Vote Counters [ACGS A.2.11]	The vote count as the basis for making decisions at the Meeting is carried out by the Securities Administration Bureau, the results of which are then read out by a Notary.
The presence of members of the Audit Committee, including the Chair of the Audit Committee	• Chairman: Didik Junaedi Rachbini - Independent Commissioner • Member: Omar Sjawaldy Anwar - President Commissioner/Independent Commissioner • Member: Vera Febyanthy - Independent Commissioner • Member: Suhendi Muharam - Independent Party • Member: Human Brilianto - Independent Party
Presence of the Chairman of the Nomination and Remuneration Committee	The Chairman of the Nomination and Remuneration Committee, Omar Sjawaldy Anwar - President Commissioner/Independent Commissioner of BNI, was present at the 2025 Extraordinary GMS.

Number of shareholders who submitted questions and/or opinions	All shareholders were given the opportunity to submit questions and/or opinions on each item on the agenda of the 2025 EGMS. A total of 1 (one) shareholder submitted a question during the 2025 EGMS.

Procedures and Procedures for the 2025 Extraordinary GMS

As a public company, BNI has implemented all stages of the 2025 Extraordinary GMS in accordance with POJK 15/2020, with details as follows:

Description	Date	Information
Notification of the Annual General Meeting of Shareholders to the Financial Services Authority (OJK)	October 30, 2025	Submitted to the OJK through Company Letter No. CSE/7/7839 dated October 30, 2025 regarding Notification of the 2025 Extraordinary GMS and the Temporary Meeting Agenda of BNI.
Announcement of the Annual General Meeting of Shareholders to Shareholders	November 6, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/8067 dated November 6, 2025, concerning the Announcement of the 2025 Extraordinary GMS. The invitation to the Annual GMS is also delivered through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Recording Date List of Shareholders Entitled to Attend the Annual GMS	November 20, 2025	Shareholders entitled to attend/be represented and vote at the Meeting are BNI Shareholders whose names are registered in the BNI Shareholders Register or Shareholders in securities accounts at PT Kustodian Sentral Efek Indonesia (KSEI) on Thursday, November 20, 2025 until 16.00 WIB.
Invitation and Information on the Agenda of the Annual General Meeting of Shareholders [ACGS A.2.13, (B) A.1]	November 21, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/8536 dated November 21, 2025. The notice for the Annual General Meeting of Shareholders (AGMS) is also delivered through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Amendment to the 2025 Extraordinary General Meeting of Shareholders (EGMS) Notice	December 15, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/9236 dated December 15, 2025. Corrections to the Notice were also submitted through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Proposed Agenda for the Annual GMS by Shareholders	November 13, 2025 & November 21, 2025	In accordance with Article 16 paragraph (2) of the POJK, Shareholders, either individually or collectively representing 1/20 (one twentieth) or more of the total number of Company shares, have the right to submit proposals regarding the Meeting Agenda, including adding Meeting Agendas, provided that the relevant parties must submit such proposals in writing to the Company's Board of Directors as the organizer of the GMS no later than 7 (seven) days prior to the date of the Meeting Notice, namely Friday, November 14, 2025, at 4:00 PM WIB. That a Series A Dwiwarna Shareholder proposed a Meeting Agenda through Letter from the Head of BP BUMN Number SR-54/BPU/11/2025 dated November 13, 2025, concerning the Approval of the 2025 Extraordinary General Meeting of Shareholders (GMS) of PT Bank Negara Indonesia (Persero) Tbk and Letter from the Head of BP BUMN No. SR-77/BPU/11/2025 dated November 21, 2025 concerning Approval of Additional Agenda for the 2025 Extraordinary GMS of PT Bank Negara Indonesia (Persero) Tbk.
Implementation of the Annual GMS	December 15, 2025	The meeting was held with physical and electronic attendance based on OJK Regulation Number 14 of 2025 concerning the Implementation of General Meetings of Shareholders, General Meetings of Bondholders, and General Meetings of Sukuk Holders Electronically with PT Kustodian Sentral Efek Indonesia as the e-RUPS provider through the eASY.KSEI Facility.
Minutes of the Annual General Meeting of Shareholders	December 15, 2025	The results of the 2025 Extraordinary GMS decisions have been notarized through the Deed of Minutes of the Annual General Meeting of Shareholders of PT Bank Negara Indonesia (Persero) Tbk No. 02 dated December 15, 2025.

Description	Date	Information
Publication of Summary of Minutes of the Annual General Meeting of Shareholders [ACGS A.2.12]	December 16, 2025	Submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/9256 dated December 16, 2025. Publication of the Summary of Minutes of the Annual General Meeting of Shareholders (AGMS) is also provided through: • The Indonesian Central Securities Depository ("KSEI") website: www.ksei.co.id; • The Indonesia Stock Exchange website: www.idx.co.id; • The BNI website: www.bni.co.id.
Reporting of Minutes of the Annual GMS to Regulators	January 14, 2026	BNI has submitted the Deed of Minutes of the Extraordinary GMS 2025 No. 02 dated December 15, 2025, made before Titik Krisna Murti Wikaningsih Hastuti, S.H., M.Kn. Notary in Jakarta through Company Letter No. CSE/7/0369 dated January 14, 2026.

DECISION-MAKING MECHANISM OF THE 2025 EGMS, DECEMBER 15, 2025 [ACGS D.3.4]

Referring to the quorum requirements as stipulated in POJK 15/2020 and the Bank's Articles of Association, all decisions of the Meeting are in principle made based on deliberation to reach consensus. If consensus is not reached, decisions are made through a voting mechanism. The voting procedures in the decision-making process of the 2025 EGMS are as follows:

1. For the First Meeting Agenda: The Meeting is attended by Series A Dwiwarna shareholders and other shareholders, and/or their authorized proxies who together represent at least 2/3 (two-thirds) of the total shares with valid voting rights. A decision is valid if approved by the Series A Dwiwarna shareholders and other shareholders and/or their authorized proxies who together represent more than 2/3 (two-thirds) of the total shares with valid voting rights present at the Meeting.

   Specifically regarding the changes to the Company's Articles of Association which include changes to the privileges of the Dwiwarna Series A, in accordance with the provisions of Article 45 of the POJK GMS, the Meeting can be held if attended by 3/4 (three-quarters) of the total shares in the share classification affected by the change in rights, namely in this case the Dwiwarna Series A Shareholders. Furthermore, the decision is valid if approved by more than 3/4 (three-quarters) of the total shares in the share classification affected by the change in rights who are present at the Meeting, which in this Meeting are the Dwiwarna Series A Shareholders.

2. For the Second and Third Meeting Agenda Items: The Meeting was attended by Shareholders or their authorized proxies who collectively represent more than 1/2 (one half) of the total number of shares with valid voting rights, and decisions are valid if approved by the Shareholders or their authorized proxies who collectively represent more than 1/2 (one half) of the total number of shares with valid voting rights present at the Meeting.

3. For the Fourth Meeting Agenda Item: The Meeting was attended by Series A Dwiwarna shareholders and other shareholders, and/or their authorized proxies who collectively represent more than 1/2 (one half) of the total number of shares with valid voting rights, and decisions are valid if approved by the Series A Dwiwarna shareholders and other shareholders and/or their authorized proxies who collectively represent more than 1/2 (one half) of the total number of shares with valid voting rights present at the Meeting.

Minutes of Resolutions of the 2025 Extraordinary General Meeting of Shareholders (EGMS) dated December 15, 2025

All resolutions, questions, and responses raised at each agenda item of the 2025 Extraordinary General Meeting of Shareholders (EGMS) have been duly addressed and/or accommodated by BNI and were recorded in Deed No. 02 dated March 15, 2025, drawn up before Titik Krisna Murti Wikaningsih Hastuti, S.H., M.Kn., Notary in the Administrative City of South Jakarta. Explanations and rationales for each agenda item requiring shareholder approval are fully accessible on BNI's website at https://www.bni.co.id/id-id/perseroan/tata-kelola/rups. The details of the 2025 EGMS resolutions are as follows:

Agenda I	Amendments to the Company's Articles of Association.		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	30,687,287,607 shares, or 94.4631125% of the total shares with valid voting rights present at the meeting	1,396,737,198 shares, or 4.2995049% of the total shares with valid voting rights present at the meeting	401,976,114 shares, or 1.2373826% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	1. Approved the amendments to the Company's Articles of Association in order to comply with laws and regulations and policies, including: a. Law Number 19 of 2003 concerning State-Owned Enterprises, as last amended by Law Number 16 of 2025 concerning the Fourth Amendment to Law Number 19 of 2003 concerning State-Owned Enterprises, including amendments to Article 5 of the Company's Articles of Association concerning changes to the privileges of Series A Dwiwarna shares owned by the Republic of Indonesia, which have been approved by more than ¾ (three-quarters) of the affected share classifications with voting rights present at the Meeting, namely, in this case, 100% of the Series A Dwiwarna Shareholders, in accordance with Article 45 of the POJK GMS; and b. Financial Services Authority Regulation Number 30 of 2024 concerning Financial Conglomerates and Financial Conglomerate Holding Companies.		
	2. Approved to re-arrange all provisions in the Company's Articles of Association in a complete codification in connection with the changes referred to in point 1 (one) of the Decision above. 3. Granted power and authority to the Company's Board of Directors with the right of substitution to take all necessary actions related to the decisions of the agenda of this Meeting, including Drafting and restating the entire Company's Articles of Association in a Notarial Deed and granting power with the right of substitution to submit to the authorized agency to obtain a receipt for notification and approval of changes to the Company's Articles of Association, to do everything deemed necessary and useful for such purposes with nothing being excluded, including to make additions and/or changes to the amendments to the Articles of Association, if such is required by the authorized agency.		
Follow-up on the Meeting's Decision	The resolutions have become effective, and the latest Articles of Association of the Company are stipulated in Deed No. 06 dated February 10, 2026, and have been published on BNI's website.		
Realization	Has been realized.		

Agenda II	Delegation of Authority for Approval of the 2026 Company Work Plan and Budget.		
Number of Shareholders' Inquiries [ACGS A.2.5]	There is 1 (one) response from the Attorney of PT Danantara Asset Management (Persero) as the Largest Series B and Series C Shareholder.		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	31,424,395,848 shares, or 96.7321152% of the total shares with valid voting rights present at the meeting	659,623,257 shares, or 2.0304846% of the total shares with valid voting rights present at the meeting.	401,981,814 shares, or 1.2374001% of the total shares with valid voting rights present at the meeting.
Meeting Resolutions [ACGS A.6.1]	Approving the granting of authority and power to the Company's Board of Commissioners by first obtaining written approval from the majority of Series B and Series C Shareholders, to approve the Company's 2026 Work Plan and Budget (RKAP) including its amendments.		
Follow-up on the Meeting's Decision [ACGS A.1.1]	The decision is being implemented.		
Realization	In the implementation process.		

Agenda III [ACGS A.2.1]	Approval of the Results of the Update of the Recovery Action Plan Document of PT Bank Negara Indonesia (Persero) Tbk for 2025/2026.
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses

Number of Shareholders' Inquiries [ACGS A.2.6, D.3.12]	Agree	Disagree	Abstain
	32,077,285,873 shares, or 98.7418733% of the total shares with valid voting rights present at the meeting	7,943,346 shares, or 0.0244516% of the total shares with valid voting rights present at the meeting.	400,771,700 shares, or 1.2336751% of the total shares with valid voting rights present at the meeting.
Keputusan Rapat*) [ACGS A.2.1, A.6.1, D.3.12]	Approving the Results of the Update of the Recovery Action Plan Document of PT Bank Negara Indonesia (Persero) Tbk for 2025/2026.		
Follow-up on the Meeting's Decision	The decision is being implemented.		
Realization	In the implementation process.		

Agenda IV	Confirmation of Dismissal of Members of the Board of Commissioners including Appointment of Replacements.		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions or comments.		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	31,987,669,939 shares, or 98.4660132% of the total shares with valid voting rights present at the meeting	97,597,580 shares, or 0.3004297% of the total shares with valid voting rights present at the meeting	400,733,400 shares, or 1.2335572% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1, A.6.4]	1. To confirm the honorable dismissal of Mr. Suminto as Commissioner of PT Bank Negara Indonesia (Persero) Tbk effective October 8, 2025, with gratitude for his contributions of energy and thought during his tenure as Commissioner of the Company. 2. To appoint Mr. Febrio Nathan Kacaribu as Commissioner of PT Bank Negara Indonesia (Persero) Tbk. 3. The term of office of the members of the Board of Commissioners appointed as referred to in point 2 shall be in accordance with the provisions of the Company's Articles of Association, with due observance of laws and regulations in the Capital Market sector and without prejudice to the right of the GMS to dismiss them at any time. 4. With the confirmation of the dismissal and appointment of the Company's Management as referred to in points 1 and 2, the composition of the Company's Management is as follows: Board of Directors 1) President Director: Putrama Wahju Setyawan 2) Deputy President Director: Alexandra Askandar 3) Risk Management Director: David Pirzada 4) Treasury & International Banking Director: Abu Santosa Sudradjat 5) Commercial Banking Director: Muhammad Iqbal 6) Human Capital & Compliance Director: Munadi Herlambang 7) Consumer Banking Director: Corina Leyla Karnalies 8) Finance & Strategy Director: Hussein Paolo Kartadjoemena 9) Operations Director: Ronny Venir 10) Corporate Banking Director: Agung Prabowo 11) Institutional Director: Eko Setyo Nugroho 12) Information Technology Director: Toto Prasetio 13) Network & Retail Funding Director: Rian Eriana Kaslan Board of Commissioners 1) President Commissioner/Independent Commissioner: Omar Sjawaldy Anwar 2) Vice President Commissioner: Tedi Bharata 3) Commissioner: Febrio Nathan Kacaribu 4) Commissioner: Donny Hutabarat 5) Independent Commissioner: Vera Febyanthy 6) Independent Commissioner: Didik Junaedi Rachbini 5. Request the Board of Directors to submit a written request to the Financial Services Authority for a Fit and Proper Test for members of the Board of Commissioners appointed as referred to in point 2, in accordance with applicable provisions. 6. Members of the Board of Commissioners appointed as referred to in point 2 who are still holding other positions prohibited by law from concurrently holding positions on the Board of Commissioners of a State-Owned Enterprise must resign or be dismissed from those positions. 7. Grant power of attorney with the right of substitution to the Company's Board of Directors to declare the decisions of this GMS in the form of a Notarial Deed and to appear before a Notary or authorized official, and to make any necessary adjustments or corrections if required by the authorized party for the purposes of implementing the meeting's decisions.		

Follow-up on the Meeting's Decision	The decision is being implemented. The appointed Board of Commissioners is currently undergoing the OJK Fit & Proper Test.
Realization	In the implementation process.

Note:
*) In accordance with the Company's Articles of Association and POJK 15, Shareholders with voting rights who are present at the Meeting but abstain are deemed to have cast the same vote as the majority of the Shareholders who cast the vote. Therefore, according to the calculations of the Indonesian Central Securities Depository (PT Kustodian Sentral Efek Indonesia) and the Securities Administration Bureau, the number of abstain votes is added to the number of affirmative votes.

INFORMATION REGARDING THE 2024 ANNUAL GMS RESOLUTION FOR THE 2023 FISCAL YEAR

Throughout the 2024 Fiscal Year, BNI held one Annual GMS for the 2023 Fiscal Year, which was held on March 4, 2024. All decisions adopted at the GMS were fully implemented throughout 2024. Information regarding the 2024 Annual GMS resolutions for the 2023 Fiscal Year and the follow-up to their implementation is as follows:

Minutes of Resolutions of the 2024 AGM, March 4, 2024

All resolutions, questions, and responses raised at each agenda item of the Annual General Meeting of Shareholders for Financial Year 2023 have been duly addressed and/or accommodated by BNI and were recorded in Deed No. 03 dated March 4, 2024, drawn up before Ashoya Ratam, S.H., M.Kn., Notary in the Administrative City of South Jakarta. Explanations and rationales for each agenda item requiring shareholder approval are fully accessible on BNI's website at https://www.bni.co.id/id-id/perseroan/tata-kelola/rups. The details of the AGMS resolutions for Financial Year 2023 are as follows:

Agenda I	Approval of the Annual Report and Ratification of the Company's Consolidated Financial Statements, Approval of the Board of Commissioners' Supervisory Task Report, and Ratification of the Financial Statements of the Micro and Small Enterprises Funding Program (PUMK) for the 2023 Financial Year, as well as granting full release and discharge (volledig acquit et de charge) to the Board of Directors for their management actions in the Company and the Board of Commissioners for their supervisory actions in the Company that have been carried out during the 2023 Financial Year.		
Number of Shareholders' Inquiries [ACGS A.2.5]	There is 1 (one) person who submits a response from the Shareholder or their representative/proxy		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,439,520,837 shares, or 99.8623768% of the total shares with valid voting rights present at the meeting	44,705,846 shares, or 0.1376232% of the total shares with valid voting rights present at the meeting	199,977,614 shares, or 0.6156145% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	1. Approved the Company's Annual Report including the Supervisory Report of the Company's Board of Commissioners for the 2023 Financial Year ending on December 31, 2023. 2. Ratified: a. Consolidated Financial Statements of the Company for the Fiscal Year 2023 ending on December 31, 2023, audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partners (a member firm of the PricewaterhouseCoopers Global network) in accordance with Report No. 00019/2.1025/AU.1/07/0222-2/1/I/2024 dated January 25, 2024, with an unqualified opinion in all material respects; and b. Financial Report of the Micro and Small Business Funding Program (PUMK) for the 2023 fiscal year ending on December 31, 2023, audited by the Public Accounting Firm Tanudiredja, Wibisana, Rintis & Partners (a member firm of the PricewaterhouseCoopers Global network) in accordance with Report No. 00043/2.1025/AU.2/07/0222-3/1/II/2024 dated February 12, 2024, with an unqualified opinion in all material respects. 3. With the approval of the Company's Annual Report, including the Board of Commissioners' Supervisory Task Report, and the ratification of the Company's Consolidated Financial Statements, as well as the Financial Statements of the Micro and Small Enterprises Funding Program (PUMK), all for the 2023 Financial Year ending on December 31, 2023, the GMS grants full release and discharge (volledig acquit et de charge) to all members of the Board of Directors for their management actions in the Company and members of the Board of Commissioners for their supervisory actions in the Company that have been carried out during the 2023 Financial Year ending on December 31, 2023, as long as these actions do not constitute a criminal offense and are reflected in the aforementioned reports.		
Follow-up on the Meeting's Decision	The decision takes effect immediately		
Realization	Already realized.		

Agenda II	Approval of the Use of the Company's Net Profit for the 2023 Financial Year		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,484,223,083 shares, or 99.9999889% of the total shares with valid voting rights present at the meeting	3,600 shares, or 0.0000111% of the total shares with valid voting rights present at the meeting	173,176,232 shares, or 0.5331087% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	Approved and determined the use of the Company's consolidated Net Profit attributable to the owners of the parent entity for the 2023 Financial Year amounting to IDR 20,909,476,149,342,- (twenty trillion nine hundred nine billion four hundred seventy six million one hundred forty nine thousand three hundred and forty two Rupiah) as follows: 1. 50% (fifty percent) or an amount of Rp10,454,738,074,671,- (ten trillion four hundred fifty four billion seven hundred thirty eight million seventy four thousand six hundred seventy one Rupiah) or an amount of Rp280,49516984960 (two hundred eighty point four nine five one six nine eight four nine six zero Rupiah) per share is determined as Cash Dividend. The payment is carried out with the following provisions: a. The dividend portion of the Republic of Indonesia amounting to Rp6,277,029,672,896.46 (six trillion two hundred seventy-seven billion twenty-nine million six hundred seventy-two thousand eight hundred ninety-six point four six Rupiah) was deposited into the State General Treasury account. b. Dividends for the 2023 Financial Year will be paid proportionally to each Shareholder whose name is recorded in the Shareholder Register on the recording date. c. The Board of Directors is granted the power and authority, with the right of substitution, to: I. Determine the schedule and distribution procedures related to the payment of dividends for the 2023 financial year in accordance with applicable regulations. II. Withhold dividend tax in accordance with applicable tax regulations. III. Perform other technical matters in accordance with applicable regulations. 2. As much as 50% (fifty percent) or an amount of Rp. 10,454,738,074,671,- (ten trillion four hundred fifty four billion seven hundred thirty eight million seventy four thousand six hundred seventy one Rupiah) is used as Retained Earnings Balance.		
Follow-up on the Meeting's Decision [ACGS A.1.1]	BNI has distributed Cash Dividends to Shareholders on April 2, 2024.		
Realization	Already realized.		

Agenda III [ACGS A.2.1]	Determination of Remuneration (Salary/Honorarium, Facilities, and Allowances) for 2024 and Tantiem for the 2023 Financial Year for the Company's Board of Directors and Board of Commissioners.		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Hasil Pengambilan Keputusan [ACGS A.2.6, D.3.12]	**Agree**	**Disagree**	**Abstain**
	30,916,510,975 shares, or 95.1739171% of the total shares with valid voting rights present at the meeting	1,567,715,708 shares, or 4.8260829% of the total shares with valid voting rights present at the meeting	173,963,032 shares, or 0.5355308% of the total shares with valid voting rights present at the meeting
Meeting Resolutions*) [ACGS A.2.1, A.6.1, D.3.12]	1. Approved the granting of authority and power to the Series A Dwiwarna Shareholder to determine for the members of the Board of Commissioners: a. Bonuses/Performance Incentives/Special Incentives for the 2023 Financial Year and/or Long-Term Incentives for the 2024-2026 Financial Year Period, in accordance with applicable regulations; and b. Honorarium, Allowances, and Facilities for the 2024 Financial Year. 2. Approved the granting of authority and power to the Board of Commissioners, with prior written approval from the Series A Dwiwarna Shareholder, to determine for the members of the Board of Directors: a. Bonuses/Performance Incentives/Special Incentives for the 2023 Financial Year and/or Long-Term Incentives for the 2024-2026 Financial Year, in accordance with applicable regulations; and b. Salaries, Allowances, and Facilities for the 2024 Financial Year.		
Follow-up on the Meeting's Decision	The decision has been implemented.		
Realization	It's in the implementation stage.		

*) Decisions regarding the approval of remuneration or increases for the Board of Directors and/or Board of Commissioners are made by Series A Dwiwarna shareholders. This is in accordance with the scope of special rights held by Series A Dwiwarna shareholders as stipulated in BNI's Articles of Association.

Agenda IV	Appointment of Public Accountant and/or Public Accounting Firm to Audit the Company's Consolidated Financial Statements and the Financial Statements of the Micro and Small Business Funding Program (PUMK) for the 2024 Financial Year		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	32,477,309,737 shares, or 99.9787068% of the total shares with valid voting rights present at the meeting	6,916,946 shares, or 0.0212932% of the total shares with valid voting rights present at the meeting	173,176,032 shares, or 0.5331081% of the total shares with valid voting rights present at the meeting
Keputusan Rapat [ACGS A.6.1, A.6.4]	1. Approved the appointment of Tanudiredja, Wibisana, Rintis & Rekan (a member firm of the PricewaterhouseCoopers Global network) as the Public Accounting Firm that will audit the Company's Consolidated Financial Statements, the Financial Statements of the Micro and Small Business Funding Program, and other Reports for the 2023 Financial Year. 2. Approved the granting of authority and power to the Company's Board of Commissioners to: a. Appoint a Public Accountant and/or Public Accounting Firm to audit the Company's Consolidated Financial Statements for other periods in the 2024 Financial Year for the purposes and interests of the Company; and b. Determining the audit fee and other requirements for the Public Accountant and/or Public Accounting Firm, and appointing a Replacement Public Accountant and/or Public Accounting Firm in the event that the Public Accounting Firm of Tanudiredja, Wibisana, Rintis & Rekan (a member firm of the PricewaterhouseCoopers Global network) is, for whatever reason, unable to complete the audit services for the Company's Consolidated Financial Statements for the 2024 Financial Year and/or other periods in the 2024 Financial Year, as well as the Financial Statements of the Micro and Small Enterprise Funding Program for the 2024 Financial Year, including determining the audit fee and other requirements for the Replacement Public Accountant and/or Public Accounting Firm.		
Follow-up on the Meeting's Decision	The decision has been implemented.		
Realization	Already realized.		

Agenda V	Amendments to the Company's Articles of Association.		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	25,446,295,643 shares, or 78.3343125% of the total shares with valid voting rights present at the meeting	7,037,931,040 shares, or 21.6656875% of the total shares with valid voting rights present at the meeting	188,399,071 shares, or 0.5799709% of the total shares with valid voting rights present at the meeting
Meeting Resolutions [ACGS A.6.1]	1. Approving the changes to the Company's Articles of Association, among others, in order to adjust to the laws and regulations (a) Law Number 4 of 2023 dated January 12, 2023 concerning the Development and Strengthening of the Financial Sector; (b) OJK Regulation Number 17 of 2023 dated September 14, 2023 concerning the Implementation of Governance for Commercial Banks; (c) Regulation of the Minister of State-Owned Enterprises Number PER-2/MBU/03/2023 dated March 24, 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises; (d) Regulation of the Minister of State-Owned Enterprises Number PER-3/MBU/03/2023 dated March 24, 2023 concerning Organs and Human Resources of State-Owned Enterprises; and (e) other related regulations. 2. Agree to re-arrange all provisions in the Company's Articles of Association in connection with the changes as referred to in point 1 (one) above.		
	3. Granting authority and power to the Board of Directors with the right of substitution to carry out all necessary actions related to the decisions of the Meeting, including but not limited to compiling and restating all of the Company's Articles of Association in a Notarial Deed, adjusting changes to the Company's Articles of Association if this is required by the authorized agency and submitting it to the authorized agency to obtain approval and receipt of notification of changes to the Company's Articles of Association, as well as carrying out everything deemed necessary and useful for this purpose with nothing being excluded.		

Follow-up on the Meeting's Decision	The decision has come into effect and the latest Articles of Association of the Company in Deed No. 5 dated March 4, 2024 has been published on the BNI website.
Realization	Already realized.

Agenda VI [ACGS A.2.3]	Approval of the Company's Recovery Plan and Resolution Plan		
Number of Shareholders' Inquiries [ACGS A.2.5]	No Shareholders submitted questions and responses		
Voting Result [ACGS A.2.6]	**Agree**	**Disagree**	**Abstain**
	25,016,488,811 shares, or 77.0111878% of the total shares with valid voting rights present at the meeting	7,467,737,872 shares, or 22.9888122% of the total shares with valid voting rights present at the meeting	422,479,549 shares, or 1.3005683% of the total shares with valid voting rights present at the meeting
Meeting Resolutions*) [ACGS A.2.3, A.6.1]	1. To honorably dismiss the following individuals as members of the Company's Management: a. Mr. ADI SULISTYOWATI as Deputy President Director; b. Mr. SIS APIK WIJAYANTO as Enterprise & Commercial Banking Director; c. Mr. MUHAMMAD Iqbal as Institutional Banking Director; d. Mr. SILVANO WINSTON RUMANTIR as Wholesale & International Banking Director; e. Mr. SUSYANTO as Commissioner; f. Mr. ASKOLANI as Commissioner each of whom was appointed based on the Resolution of the Annual General Meeting of Shareholders for the 2019 Financial Year dated February 20, 2020 in conjunction with the Extraordinary General Meeting of Shareholders for the 2020 Financial Year dated September 2, 2020, Resolution of the Annual General Meeting of Shareholders for the 2019 Financial Year dated February 20, 2020 in conjunction with the Extraordinary General Meeting of Shareholders for the 2022 Financial Year dated August 31, 2022 in conjunction with the Annual General Meeting of Shareholders for the 2022 Financial Year dated March 15, 2023, Resolution of the Extraordinary General Meeting of Shareholders for the 2020 Financial Year dated September 2 ... 2023, the Resolution of the Annual General Meeting of Shareholders for the 2019 Financial Year dated February 20, 2020, and the Resolution of the Extraordinary General Meeting of Shareholders for 2019 dated August 30, 2019 with gratitude for the contribution of energy and thoughts given during his tenure as a member of the Company's Management. 2. To reassign the following names as members of the Company's Board of Directors as follows: a. PUTRAMA W. SETYAWAN, previously Retail Banking Director, to Deputy President Director; b. CORINA LEYLA KARNALIES, Digital & Integrated Transaction Banking Director, to Retail Banking Director; each of whom was appointed based on the Resolution of the 2022 Extraordinary General Meeting of Shareholders dated August 31, 2022, in conjunction with the Annual General Meeting of Shareholders for the 2022 Financial Year, dated March 15, 2023, and the Resolution of the Annual General Meeting of Shareholders for the 2019 Financial Year, dated February 20, 2020, in conjunction with the 2022 Extraordinary General Meeting of Shareholders dated August 31, 2022, in conjunction with the Annual General Meeting of Shareholders for the 2022 Financial Year, dated March 15, 2023, with their terms of office continuing the remainder of their respective terms of office, in accordance with the Resolution of the respective appointing GMS. 3. To appoint the following names as members of the Company's Management: a. Mr. HUSSEIN PAOLO KARTADJOEMENA as Digital and Integrated Transaction Banking Director; b. Mr. I MADE SUKAJAYA as Enterprise and Commercial Banking Director; c. Mr. MUNADI HERLAMBANG as Institutional Director; d. Mr. AGUNG PRABOWO as Wholesale and International Banking Director; e. Mr. ASKOLANI as Commissioner; f. Mr. MOHAMAD YUSUF PERMANA as Commissioner. 4. The term of office of the members of the Board of Directors and Board of Commissioners appointed as referred to in number 3, is in accordance with the provisions of the Company's Articles of Association, taking into account the laws and regulations in the Capital Market sector and without reducing the right of the GMS to dismiss at any time.		

	5. With the dismissal, change in position nomenclature, transfer of duties, and appointment of members of the Company's Board of Directors and Board of Commissioners as referred to in points 1, 2, and 3, the composition of the Company's Board of Directors and Board of Commissioners is as follows: a. Board of Directors President Director: Royke Tumilaar Deputy President Director: Putrama W. Setyawan Digital and Integrated Transaction Banking Director: Hussein Paolo Kartadjoemena Enterprise and Commercial Banking Director: I Made Sukajaya Finance Director: Novita Widya Anggraini Risk Management Director: David Pirzada Institutional Director: Munadi Herlambang Network & Services Director: Ronny Venir Retail Banking Director: Corina Leyla Karnalies Technology and Operations Director: Toto Prasetio Human Capital & Compliance Director: Mucharom Wholesale and International Banking Director: Agung Prabowo b. Board of Commissioners President Commissioner/Independent Commissioner: Pradjoto Vice President Commissioner: Pahala Nugraha Mansury Commissioner: Askolani Commissioner: Fadlansyah Lubis Commissioner: Robertus Billitea Commissioner: Mohamad Yusuf Permana Independent Commissioner: Erwin Rijanto Independent Commissioner: Sigit Widyawan Independent Commissioner: Septian Hario Seto Independent Commissioner: Iman Sugema Independent Commissioner: Asmawi Syam 6. Members of the Board of Directors and Board of Commissioners appointed as referred to in number 3 points 1), 2), 3), 4), and 6) as well as members of the Board of Directors who are transferred as referred to in number 2 point 1) may only carry out their duties after obtaining approval from the Financial Services Authority (OJK) for the Fit and Proper Test and complying with applicable laws and regulations. In the event that the members of the Board of Directors and Board of Commissioners are later declared not approved as members of the Board of Directors and Board of Commissioners in the Fit and Proper Test by the OJK, then the members of the Board of Directors and Board of Commissioners are honorably dismissed from the date of the stipulation of the Decision on the results of the Fit and Proper Test by the OJK. 7. Requesting the Board of Directors to submit a written application to the Financial Services Authority for the implementation of a Fit & Proper Test for members of the Board of Directors and Board of Commissioners appointed as referred to in number 3 points 1), 2), 3), 4), and 6) as well as members of the Board of Directors who are transferred as referred to in number 2 point 1). 8. Members of the Board of Directors and Board of Commissioners appointed as referred to in point 3 who are still holding other positions which are prohibited by statutory regulations from being held concurrently with the position of member of the Board of Directors and Board of Commissioners of a State-Owned Enterprise, then the person concerned must resign or be dismissed from that position. 9. Granting power of attorney with the right of substitution to the Company's Board of Directors to state the decisions of this GMS in the form of a Notarial Deed and to appear before a Notary or authorized official and make necessary adjustments or corrections if required by the authorized party for the purposes of implementing the contents of the meeting's decisions.
Follow-up on the Meeting's Decision	The decision has taken effect.
Realization	Already realized.

*) Decisions regarding approval of changes to the Bank's management are made by Series A Dwiwarna shareholders. This is in accordance with the scope of special rights held by Series A Dwiwarna shareholders as stipulated in BNI's Articles of Association.

Board of Commissioners

The Board of Commissioners is the highest governance organ at BNI and plays a vital role in exercising general and/or specific oversight functions in accordance with the Articles of Association. In carrying out its roles and functions, the Board of Commissioners is responsible for ensuring that the Bank conducts its business activities in line with the Bank's purposes and objectives, providing strategic advice to the Board of Directors to promote sound management practices, ensuring the implementation of the principles of Good Corporate Governance (GCG) at all levels of the organisation, and ensuring compliance with the Articles of Association, resolutions of the General Meeting of Shareholders (GMS), as well as applicable laws and regulations.

LEGAL BASIS

The basis for the establishment and appointment of the BNI Board of Commissioners refers to a number of laws, regulations, Articles of Association, and related regulations, including:

1. Law No. 40 of 2007 concerning Limited Liability Companies, as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
2. Law of the Republic of Indonesia No. 19 of 2003, concerning State-Owned Enterprises, as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law;
3. Financial Services Authority Regulation No. 33/POJK.04/2014, concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies;
4. Financial Services Authority Regulation No. 17 of 2023, concerning the Implementation of Governance for Commercial Banks;
5. Financial Services Authority Circular Letter No. 14/SEOJK.03/2025, concerning the Implementation of Commercial Bank Governance;
6. Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
7. Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023, concerning the Organs and Human Resources of State-Owned Enterprises;
8. The Bank's Articles of Association.

BOARD OF COMMISSIONERS CHARTER

[ACGS D.1.1]

BNI has clearly stipulated all duties, responsibilities, and working relationships among the Board of Commissioners, the Board of Directors, and other governance organs in the Board of Commissioners Charter, which has been updated and approved through BNI Board of Commissioners Decree No. KEP/017/DK/2025 dated September 19, 2025. This Charter serves as a comprehensive guideline for the Board of Commissioners in carrying out its obligations, including overseeing management policies and the conduct of the Company's management by the Board of Directors. All such oversight activities are carried out to uphold the implementation of the principles of Good Corporate Governance (GCG).

The contents of the Bank's Board of Commissioners Charter regulate various matters, including:

1. Legal Basis;
2. Structure;
3. Requirements for Board of Commissioners Members;
4. Independent Commissioners;
5. Duties, Authorities, Obligations, and Responsibilities of the Board of Commissioners;
6. Appointment and Dismissal of Board of Commissioners Members;
7. Term of Office and Vacant Positions within the Board of Commissioners;
8. Meetings of the Board of Commissioners and Joint Meetings with the Board of Directors;
9. Division of Work and Working Hours of the Board of Commissioners;
10. Committees under the Board of Commissioners;
11. Secretariat of the Board of Commissioners and the Corporate Secretary to the Board of Commissioners;
12. Corporate Values;
13. Work Ethics and Prohibitions for the Board of Commissioners;
14. Transparency; and
15. Induction Program.

The Board of Commissioners Charter is periodically reviewed and updated in accordance with the prevailing laws and regulations in Indonesia. The most recent update was made on September 19, 2025, and the document is accessible through BNI official website.

CRITERIA OR QUALIFICATIONS OF THE BOARD OF COMMISSIONERS [ACGS D.3.9, D.3.11]

All candidates and members of the BNI Board of Commissioners who are in office are confirmed to have met the criteria set out in the BNI GCG Policy as follows:

1. Members of the Board of Commissioners are appointed and dismissed by a GMS which must be attended by Series A Dwiwarna Shareholders and the decision of the GMS must be approved by Series A Dwiwarna Shareholders by considering the provisions in the Articles of Association
2. The procedures for appointing members of the Board of Commissioners refer to the OJK regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies and the regulations of the Minister of SOEs concerning SOE Organs and Human Resources. The procedures for appointing members of the Board of Commissioners include:
   a. Sources of prospective candidates for members of the Board of Commissioners come from:
      1) Former Directors of SOEs;
      2) Board of Commissioners/Supervisory Board of SOEs;
      3) Structural Officials and Functional Officials of the Government or
      4) Other sources.
   b. The GMS/Minister may determine candidates proposed by the Nomination and Remuneration Committee to become members of the Board of Commissioners.
   c. The determination of a person as a member of the Board of Commissioners may be carried out after being declared to have passed the Fit and Proper Test (UKK) in accordance with sectoral provisions.
   d. In the event that the appointment of members of the Board of Commissioners is carried out before the UKK in accordance with sectoral provisions, the actions, duties and functions as members of the Board of Commissioners shall be accounted for from the date of being declared to have passed the UKK in accordance with sectoral provisions.
   e. Members of the Board of Commissioners as referred to in point d have an effective term of office since being determined by the GMS/ Minister.
   f. The curriculum vitae (CV) of prospective members of the Board of Commissioners who will be proposed for appointment at the GMS must be available and announced at the time of the GMS before the decision is made regarding the appointment as members of the Board of Commissioners.
3. Every proposal for the replacement and/ or appointment of members of the Board of Commissioners to the GMS must take into account the recommendations of the committee that carries out the nomination function.
4. Members of the committee that carries out the nomination function who have a conflict of interest with the recommended proposal must disclose this in the recommended proposal.
5. Replacement and/or appointment of members of the Board of Commissioners prioritizes professional composition, independence, competency suitability, and attention to diversity in terms of education (field of study), work experience, age, expertise without distinguishing ethnicity, religion, and race, which are needed appropriately in carrying out the duties and responsibilities of the Board of Commissioners.
6. Appointment of members of the Board of Commissioners who come from employees or officials at institutions that carry out regulatory and/or supervisory functions of Banks and/or other financial services institutions is carried out after the person concerned has effectively resigned as an employee or official and has undergone a waiting period of at least 6 (six) months.
7. The GMS (General Meeting of Shareholders) resolution regarding the appointment and dismissal of members of the Board of Commissioners also stipulates the effective date of such appointment and dismissal. In the event that the GMS does not specify the date, the appointment and dismissal of the members of the Board of Commissioners shall become effective as of the closing of the GMS.
8. Members of the Board of Commissioners are appointed for a term commencing from the date determined by the GMS that appointed them and ending at the closing of the fifth (5th) Annual GMS following the date of their appointment, provided that the term shall not exceed five (5) years. This is subject to the prevailing laws and regulations in the Capital Market and Banking sectors, without prejudice to the right of the GMS to dismiss any member of the Board of Commissioners at any time before the expiration of their term. Upon the expiration of their term, members of the Board of Commissioners may be reappointed by the GMS for one additional term.
9. Individuals eligible for appointment as members of the Board of Commissioners must meet the following requirements at the time of appointment and throughout their term:

a. Possess good character, morals, and integrity, and be legally competent.
b. Within five (5) years prior to appointment and during the term of office:
   1) Have never been declared bankrupt;
   2) Have never served as a member of the Board of Directors and/or Board of Commissioners held responsible for causing a company to be declared bankrupt;
   3) Have never been convicted of a criminal offense that caused financial loss to the state and/or is related to the financial sector;
   4) Have never served as a member of the Board of Directors and/or Board of Commissioners who, during their term of office:
      a) Failed to convene an Annual GMS;
      b) Had their accountability as a member of the Board of Directors and/or Board of Commissioners rejected by the GMS or failed to provide such accountability to the GMS; and
      c) Caused a company holding licenses, approvals, or registrations from the Financial Services Authority (OJK) to fail in fulfilling its obligation to submit annual reports and/or financial statements to the OJK or whose annual reports and/or financial statements were not approved and/or ratified by the GMS.
c. Possess knowledge and/or expertise in fields required by the Company, along with other qualifications as stipulated by the applicable laws and regulations governing the Company.
d. Have a time commitment to the company.

10. The mechanisms for the appointment, replacement, dismissal, and/or resignation of members of the Board of Commissioners shall be guided by the prevailing laws and regulations as well as the Company's Articles of Association.

TERM OF OFFICE OF THE BOARD OF COMMISSIONERS [ACGS D.2.5, D.3.11]

In accordance with the provisions of the Board of Commissioners Charter, the term of office of BNI Board of Commissioners members is set at a maximum of two consecutive terms, with the following details:

1. Members of the Board of Commissioners are appointed for a term commencing from the date determined by the General Meeting of Shareholders (GMS) that appoints them and ending at the close of the fifth (5th) Annual GMS following their appointment date, provided that it does not exceed a period of five (5) years, in accordance with prevailing capital market and banking regulations. However, this does not preclude the right of the GMS to dismiss members of the Board of Commissioners at any time before the end of their term; and
2. Upon the expiration of their term, members of the Board of Commissioners may be reappointed by the GMS for one (1) additional term of office.

STRUCTURE, NUMBER, AND COMPOSITION (INCLUDING THE LEGAL BASIS FOR APPOINTMENT) OF THE BOARD OF COMMISSIONERS IN 2025

BNI constantly adjusts the number and composition of its Board of Commissioners so that its supervisory function can be carried out effectively, objectively, and independently. By 2025, all members of the Board of Commissioners have met the requirements regarding number, composition, and other provisions as stipulated in the BNI Board of Commissioners Charter, namely:

1. The number of members of the BNI Board of Commissioners shall be at least 3 (three) persons. As of December 31, 2025, BNI Board of Commissioners consists 6 (six) members, comprising of 1 (one) President Commissioner/ Independent Commissioner; 1 (one) Vice President Commissioner; and 4 (four) other Commissioners.
2. The number of members of BNI Board of Commissioners does not exceed the number of members of BNI Board of Directors;
3. The Board of Commissioners is led by the President Commissioner, who is independent of the Controlling Shareholder, other members of the Board of Commissioners, and members of BNI Board of Directors;
4. The replacement and/or appointment of members of BNI Board of Commissioners has considered the recommendations of the Nomination and Remuneration Committee, obtained the approval of shareholders, and received the approval of the Financial Services Authority (OJK);
5. None of the members of BNI Board of Commissioners have family relationships up to the third degree with fellow members of the Board of Commissioners and/or the Board of Directors and
6. Five (5) of the six (6) members of the BNI Board of Commissioners have passed the Fit and Proper Test, while one (1) newly appointed Board of Commissioner at the Extraordinary General Meeting of Shareholders (EGMS) on December 15, 2025 is still undergoing a Fit and Proper Test by the OJK.

In 2025, changes occurred in the composition of BNI Board of Commissioners based on the resolutions of the Annual General Meeting of Shareholders (AGMS) held on March 26, 2025, and the Extraordinary General Meeting of Shareholders (EGMS) held on December 15, 2025. These changes included the appointment and dismissal of members of the Board of Commissioners in accordance with organizational needs and the Company's dynamics. All such processes were carried out in compliance with BNI Articles of Association, which stipulates that the appointment and dismissal of members of the Board of Commissioners shall be decided through resolutions of the GMS. Details of the changes in the composition of the Board of Commissioners during 2025 are presented in the following table:

Period January 1, 2025 – March 26, 2025:

During the period from January 1, 2025 to March 26, 2025, the BNI Board of Commissioners consisted of 11 (eleven) members, comprising 1 (one) President Commissioner/Independent Commissioner, 1 (one) Vice President Commissioner, and 9 (nine) Commissioners.

Name	Position	Domicile	Date of Appointment	Effective Date of Appointment *)	Term of Office
Pradjoto	President Commissioner/ Independent Commissioner ***) [ACGS D.4.2]	Jakarta	EGMS September 19, 2023	February 19, 2024	2020-2025**)
Pahala Nugraha Mansury	Vice President Commissioner	Jakarta	EGMS September 19, 2023	February 19, 2024	2023-2028
Sigit Widyawan	Independent Commissioner	Solo	AGMS March 15, 2023	March 15, 2023	2023-2028
Askolani	Commissioner	Jakarta	AGMS March 4, 2024	March 4, 2024	2024-2029
Asmawi Syam	Independent Commissioner **)	Jakarta	AGMS February 20, 2020	June 17, 2020	2020-2025
Septian Hario Seto	Independent Commissioner **)	Jakarta	AGMS February 20, 2020	August 14, 2020	2020-2025
Iman Sugema	Independent Commissioner **)	Bogor	AGMS February 20, 2020	August 14, 2020	2020-2025
Erwin Rijanto Slamet	Independent Commissioner	Jakarta	AGMS March 29, 2021	August 6, 2021	2021-2026
Fadlansyah Lubis	Commissioner	Jakarta	EGMS August 31, 2022	December 23, 2022	2022-2027
Robertus Billitea	Commissioner	Jakarta	AGMS March 15, 2023	September 11, 2023	2023-2028
Mohamad Yusuf Permana	Commissioner	Bogor	AGMS March 4, 2024	September 2, 2024	2024-2029

*) Effectively serving as the Board of Commissioners after obtaining OJK approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/ POJK.03/2016 dated July 22, 2016 concerning the Fit and Proper Test for Key Parties of Financial Services Institutions.
**) Following his previous term as Vice President Commissioner/Independent Commissioner of BNI.
***) Effectively serving as a member of the Board of Commissioners until February 20, 2025, in connection with the expiration of the term of office as a member of the Board of Commissioners after 5 (five) years from the date of appointment.

Period of March 26, 2025 – October 8, 2025:

During the period from March 26, 2025 to October 8, 2025, the BNI Board of Commissioners consisted of 6 (six) members, comprising 1 (one) President Commissioner/Independent Commissioner, 1 (one) Vice President Commissioner, and 4 (four) Commissioners.

Name	Position	Domicile	Date of Appointment	Effective Date of Appointment *)	Term of Office
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner [ACGS D.4.2]	Jakarta	AGMS 26 March 2025	June 30, 2025	2025-2030
Tedi Bharata	Vice President Commissioner	Jakarta	AGMS 26 March 2025	June 5, 2025	2025-2030
Vera Febyanthy	Independent Commissioner	Jakarta	AGMS 26 March 2025	August 13, 2025	2025-2030
Didik Junaedi Rachbini	Independent Commissioner	Depok	AGMS 26 March 2025	August 13, 2025	2025-2030
Suminto	Commissioner	Jakarta	AGMS 26 March 2025	August 13, 2025	2025-2030
Donny Hutabarat	Commissioner	Jakarta	AGMS 26 March 2025	October 16, 2025	2025-2030

*) Effectively serving as the Board of Commissioners after obtaining OJK approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/ POJK.03/2016 dated July 22, 2016 concerning the Fit and Proper Test for Key Parties of Financial Services Institutions

Period of October 8, 2025 – December 15, 2025:

During the period from October 8, 2025 to December 15, 2025, the BNI Board of Commissioners consisted of 5 (five) members, comprising 1 (one) President Commissioner/Independent Commissioner, 1 (one) Vice President Commissioner, and 3 (three) Commissioners.

Name	Position	Domicile	Date of Appointment	Effective Date of Appointment *)	Term of Office
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner [ACGS D.4.2]	Jakarta	AGMS 26 March 2025	June 30, 2025	2025-2030
Tedi Bharata	Vice President Commissioner	Jakarta	AGMS 26 March 2025	June 5, 2025	2025-2030
Vera Febyanthy	Independent Commissioner	Jakarta	AGMS 26 March 2025	August 13, 2025	2025-2030
Didik Junaedi Rachbini	Independent Commissioner	Depok	AGMS 26 March 2025	August 13, 2025	2025-2030
Donny Hutabarat	Commissioner	Jakarta	AGMS 26 March 2025	October 16, 2025	2025-2030

*) Effectively serving as the Board of Commissioners after obtaining OJK approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/ POJK.03/2016 dated July 22, 2016 concerning the Fit and Proper Test for Key Parties of Financial Services Institutions

Period of December 15, 2025 – December 31, 2025:

During the period from December 15, 2025 to December 31, 2025, the BNI Board of Commissioners consisted of 6 (six) members, comprising 1 (one) President Commissioner/Independent Commissioner, 1 (one) Vice President Commissioner, and 4 (four) Commissioners.

Name	Position	Domicile	Date of Appointment	Effective Date of Appointment *)	Term of Office
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner [ACGS D.4.2]	Jakarta	AGMS 26 March 2025	June 30, 2025	2025-2030
Tedi Bharata	Vice President Commissioner	Jakarta	AGMS 26 March 2025	June 5, 2025	2025-2030
Vera Febyanthy	Independent Commissioner	Jakarta	AGMS 26 March 2025	August 13, 2025	2025-2030
Didik Junaedi Rachbini	Independent Commissioner	Depok	AGMS 26 March 2025	August 13, 2025	2025-2030
Donny Hutabarat	Commissioner	Jakarta	AGMS 26 March 2025	October 16, 2025	2025-2030
Febrio Nathan Kacaribu	Komisaris	Jakarta	EGMS December 15, 2025	Currently undergoing OJK Fit & Proper Test	2025-2030

*) Effectively serving as the Board of Commissioners after obtaining OJK approval for the Fit and Proper Test. This is in accordance with OJK Regulation No. 27/ POJK.03/2016 dated July 22, 2016 concerning the Fit and Proper Test for Key Parties of Financial Services Institutions

As of December 31, 2025, BNI had 1 (one) female Independent Commissioner, namely Ms. Vera Febyanthy. [ACGS (B)D.1.1]

As shown in the table above, BNI Board of Commissioners is led by a President Commissioner who originates from an independent or external professional background. In line with BNI internal provisions and globally recognized best practices in corporate governance, BNI ensures that Mr. Omar Sjawaldy Anwar, in his capacity as President Commissioner/Independent Commissioner, has never served as President Director of BNI within the past three (3) years. [ACGS D.4.2]

With the updated composition of the Board of Commissioners, BNI ensures that no member of the Board of Commissioners (including Independent Commissioners) serves for more than two terms of five years each in the same capacity. The career history of each Commissioner has been disclosed in the Company Profile chapter, sub-chapter Profile of the Board of Commissioners, in the 2025 Annual Report.

MECHANISM FOR APPOINTMENT, TERMINATION, AND RESIGNATION OF THE BOARD OF COMMISSIONERS [ACGS A.2.3, D.3.10]

The procedures and regulations for the termination or resignation of members of the Board of Commissioners are clearly stipulated in BNI Articles of Association, with reference to the provisions of POJK No. 33/POJK.04/2014 and POJK No. 15/ POJK.04/2020. The provisions in question cover the following matters:

1. Members of the Board of Commissioners are appointed and dismissed by the General Meeting of Shareholders (GMS), which must be attended by the Series A Dwiwarna shareholders, and the decisions of the meeting must be approved by the Series A Dwiwarna shareholders, in accordance with the provisions of the Articles of Association;
2. Members of the Board of Commissioners may be dismissed at any time based on a decision of the GMS, which must specify the reasons for such dismissal. The reasons for dismissal of a member of the Board of Commissioners include, but are not limited to:
   a. Failure to perform their duties properly;
   b. Violating the provisions of the Articles of Association and/or laws and regulations;
   c. Being involved in actions that harm the Company and/or the state;
   d. Engaging in actions that violate ethics and/or propriety expected of a member of the Board of Commissioners;
   e. Being found guilty by a court ruling that has permanent legal force;
   f. Resignation.
3. In addition to the reasons mentioned above, members of the Board of Commissioners may also be dismissed by the GMS for other reasons deemed appropriate by the GMS in the best interest of the Company;
4. A decision for dismissal based on reasons under items 2 (a), (b), (c), and (d) and item 3 above will be taken after the individual concerned has been given the opportunity to defend themselves at the GMS;
5. Dismissal under item 2 (c) and (e) above will be considered an unjustified dismissal;
6. There shall be no familial relationship between members of the Board of Commissioners and between Board of Commissioners members and Board of Directors members up to the third degree of consanguinity, whether in a direct or collateral line, or by marriage, including in-laws. In such cases, the GMS has the authority to dismiss one of the individuals concerned;
7. A member of the Board of Commissioners may resign from their position before the end of their term by providing written notice to the Company;
8. The Company is required to hold a GMS to decide on the resignation of a member of the Board of Commissioners no later than 90 (ninety) days after receiving the resignation letter;
9. The Company must disclose information to the public and submit it to OJK no later than 2 (two) working days after receiving the resignation letter from a member of the Board of Commissioners, as outlined in item 7, and after the GMS is held as described in item 8;
10. Prior to the resignation becoming effective, the resigning member of the Board of Commissioners remains responsible for completing their duties and responsibilities in accordance with the Articles of Association and applicable laws and regulations;
11. A member of the Board of Commissioners who has resigned remains accountable for their actions as a Board member up to the date of approval of their resignation at the GMS;
12. The discharge of responsibility for a resigning member of the Board of Commissioners is granted after the Annual GMS has given approval;
13. If the resignation of a member of the Board of Commissioners results in the number of Commissioners falling below 3 (three) members, the resignation is valid only if the GMS has approved it, and a new member has been appointed, ensuring compliance with the minimum number of Board of Commissioners me
14. A member's term on the Board of Commissioners ends upon:
    a. The effective date of their resignation, as outlined in item 8;
    b. Death;
    c. Completion of their term;
    d. Dismissal by the GMS
    e. Being declared bankrupt by a Commercial Court ruling that has permanent legal force or being placed under guardianship by court order; and
    f. Failing to meet the qualifications as a member of the Board of Commissioners according to the Articles of Association and other applicable laws.
15. A member of the Board of Commissioners who leaves their position, whether before or after their term ends, except in cases of death, remains responsible for any actions not yet accounted for by the GMS.

FIT AND PROPER TEST

New candidates for the Board of Commissioners of BNI may only carry out their duties, tasks, and functions after receiving approval from OJK. This is in accordance with POJK No. 27/POJK.03/2016 regarding the Fit and Proper Test for Key Parties in Financial Service Institutions. Below is a list of BNI Board of Commissioners members who have passed the Fit and Proper Test without any remarks and have received OJK approval:

Fit and Proper Test

No.	Name	Position	Organizer	Result	Effective Date Based on OJK Letter	Effective Date of Appointment
1.	Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner [ACGS D.4.2]	Financial Services Authority	Pass	OJK Letter No. SR-209/ PB.02/2025 dated June 26, 2025	June 30, 2025
2.	Tedi Bharata	Vice President Commissioner	Financial Services Authority	Pass	OJK Letter No. SR-178/ PB.02/2025 dated June 5, 2025	June 5, 2025
3.	Vera Febyanthy	Independent Commissioner	Financial Services Authority	Pass	OJK Letter No. SR-314/ PB.02/2025 dated August 12, 2025	August 13, 2025
4.	Didik Junaedi Rachbini	Independent Commissioner	Financial Services Authority	Pass	OJK Letter No. SR-314/ PB.02/2025 dated August 12, 2025	August 13, 2025
5.	Donny Hutabarat	Commissioner	Financial Services Authority	Pass	OJK Letter No. SR 426/ PB.02/2025 dated October 14, 2025	October 16, 2025
6.	Febrio Nathan Kacaribu	Commissioner	Financial Services Authority	Served as a member of the Board of Commissioners since December 15, 2025 and is still undergoing a fit and proper test by the OJK.		

DUTIES AND RESPONSIBILITIES OF THE BOARD OF COMMISSIONERS [ACGS D.1.3]

In carrying out its supervisory function over the management policies and the general course of management of the Bank and its business activities undertaken by the Board of Directors, the Board of Commissioners acts and is collectively responsible with the assistance of supporting organs below it, such as the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, and Integrated Governance Committee, according to their respective fields. In addition to fulfilling its supervisory role, the Board of Commissioners also plays an advisory role to the Board of Directors, including monitoring the implementation of the Company's Long-Term Plan, the Company's Work Plan and Budget, and ensuring the Bank's compliance with applicable laws and regulations, in order to achieve the Bank's interests in accordance with the Bank's objectives and goals.

Based on Law No. 40 of 2007 regarding Limited Liability Companies, as amended by Law No. 6 of 2023 on the Ratification of the Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law, as further amended by Law No. 11 of 2020 on Job Creation, and the Articles of Association of BNI, the Board of Commissioners is obligated to:

1. Comply with the Articles of Association and applicable laws and regulations, as well as principles of professionalism, efficiency, transparency, independence, accountability, responsibility, fairness, and equality;
2. Act in good faith, with caution, and responsibly in carrying out its supervisory and advisory duties to the Board of Directors for the benefit of the Company and in accordance with the Company's objectives and goals.

Meanwhile, to maintain objectivity and independence in carrying out its supervisory functions and duties, the Board of Commissioners is prohibited from being involved in decision-making related to the Bank's operational activities, except in relation to:

1. The provision of funds to related parties as regulated by the provisions regarding the maximum limits of credit extension by commercial banks; and
2. Other matters as regulated in the Bank's Articles of Association or applicable laws and regulations.

The decision-making in the Bank's operational activities by the Board of Commissioners as mentioned above is part of the supervisory duties of the Board of Commissioners but does not absolve the Board of Directors from responsibility for managing the Bank.

Duties and Responsibilities of the President Commissioner [ACGS D.4.4]

The President Commissioner of BNI has the following duties and responsibilities:

1. Coordinate the implementation of the Board of Commissioners' tasks;
2. Lead meetings of the Board of Commissioners;
3. Sign written documents, including correspondence with another Commissioner;
4. Represent the Board of Commissioners in attending meetings and events organized by the authorities, Series A Dwiwarna shareholders, and other agencies; and
5. Represent the Board of Commissioners in leading the General Meeting of Shareholders of the Company.

Delegation of Duties to Members of the Board of Commissioners [ACGS D.1.3]

Considering the diversity within the Board of Commissioners in terms of expertise and professional experience, the Bank has clearly defined the delegation of duties to each member of the Board of Commissioners, both as chairpersons or members of the committees formed by the Board of Commissioners to assist in the implementation of its supervisory duties collectively. The delegation of duties to each member of the Board of Commissioners of BNI is as follows:

Period of January 1, 2025 – March 26, 2025

Name	Position	Period	Committee Membership by the Board of Commissioners Members
Pradjoto	President Commissioner/ Independent Commissioner	• January 1, 2025 – February 20, 2025 • January 1, 2025 – February 20, 2025	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman
Pahala Nugraha Mansury	Vice President Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
Sigit Widyawan	Independent Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Nomination and Remuneration Committee Member • Audit Committee Member
Askolani	Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman
Asmawi Syam	Independent Commissioner	• January 1, 2025 – February 20, 2025 • January 1, 2025 – February 20, 2025	• Audit Committee Chairman • Nomination and Remuneration Committee Member
Septian Hario Seto	Independent Commissioner	• January 1, 2025 – February 20, 2025 • January 1, 2025 – February 20, 2025	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
Iman Sugema	Independent Commissioner	• January 1, 2025 – February 20, 2025 • January 1, 2025 – February 20, 2025	• Nomination and Remuneration Committee Member • Audit Committee Member
Erwin Rijanto Slamet	Independent Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Risk Monitoring Committee Chairman • Nomination and Remuneration Committee Member
Fadlansyah Lubis	Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member
Robertus Billitea	Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
Mohamad Yusuf Permana	Commissioner	• January 1, 2025 – March 26, 2025 • January 1, 2025 – March 26, 2025	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member

Period of March 26, 2025 – October 8, 2025:

Name	Position	Period	Committee Membership by the Board of Commissioners Members
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	• June 30, 2025 – present • June 30, 2025 – present • September 2, 2025 – present	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman • Audit Committee Member
Tedi Bharata	Vice President Commissioner	• June 5, 2025 – present • June 5, 2025 – present	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
Vera Febyanthy	Independent Commissioner	• August 13, 2025 – present • August 13, 2025 – present • August 13, 2025 – present • September 2, 2025 – present	• Risk Monitoring Committee Chairman • Nomination and Remuneration Committee Member • Integrated Governance Committee Member • Audit Committee Member
Didik Junaedi Rachbini	Independent Commissioner	• September 2, 2025 – present • August 13, 2025 – present • August 13, 2025 – present	• Audit Committee Chairman • Nomination and Remuneration Committee Member • Integrated Governance Committee Member

Name	Position	Period	Committee Membership by the Board of Commissioners Members
Suminto	Commissioner	• August 13, 2025 – October 8, 2025 • August 13, 2025 – October 8, 2025 • August 13, 2025 – October 8, 2025	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member • Integrated Governance Committee Member
Donny Hutabarat	Commissioner	Still undergoing a fit and proper test by the OJK.	

Period of October 8, 2025 – December 15, 2025:

Name	Position	Period	Committee Membership by the Board of Commissioners Members
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	• June 30, 2025 – present • June 30, 2025 – present • September 2, 2025 – present	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman • Audit Committee Member
Tedi Bharata	Vice President Commissioner	• June 5, 2025 – present • June 5, 2025 – present	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
Vera Febyanthy	Independent Commissioner	• August 13, 2025 – present • August 13, 2025 – present • August 13, 2025 – present • September 2, 2025 – present	• Risk Monitoring Committee Chairman • Nomination and Remuneration Committee Member • Integrated Governance Committee Member • Audit Committee Member
Didik Junaedi Rachbini	Independent Commissioner	• September 2, 2025 – present • August 13, 2025 – present • August 13, 2025 – present	• Audit Committee Chairman • Nomination and Remuneration Committee Member • Integrated Governance Committee Member
Donny Hutabarat	Commissioner	• October 16, 2025 – present • October 16, 2025 – present • October 16, 2025 – present	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member • Integrated Governance Committee Member

Periode of December 15, 2025 – December 31, 2025:

Name	Position	Period	Committee Membership by the Board of Commissioners Members
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	• June 30, 2025 – present • June 30, 2025 – present • September 2, 2025 – present	• Nomination and Remuneration Committee Chairman • Integrated Governance Committee Chairman • Audit Committee Member
Tedi Bharata	Vice President Commissioner	• June 5, 2025 – present • June 5, 2025 – present	• Nomination and Remuneration Committee Member • Integrated Governance Committee Member
Vera Febyanthy	Independent Commissioner	• August 13, 2025 – present • August 13, 2025 – present • August 13, 2025 – present • September 2, 2025 – present	• Risk Monitoring Committee Chairman • Nomination and Remuneration Committee Member • Integrated Governance Committee Member • Audit Committee Member
Didik Junaedi Rachbini	Independent Commissioner	• September 2, 2025 – present • August 13, 2025 – present • August 13, 2025 – present	• Audit Committee Chairman • Nomination and Remuneration Committee Member • Integrated Governance Committee Member
Donny Hutabarat	Commissioner	• October 16, 2025 – present • October 16, 2025 – present • October 16, 2025 – present	• Nomination and Remuneration Committee Member • Risk Monitoring Committee Member • Integrated Governance Committee Member
Febrio Nathan Kacaribu[1)]	Commissioner	Still undergoing a fit and proper test by the OJK.	

[1)] Served as a member of the Board of Commissioners since December 15, 2025, and as of December 31, 2025, is still undergoing a fit and proper test by the OJK.

AUTHORITY OF THE BOARD OF COMMISSIONERS

As stipulated in the Articles of Association, the Bank delegates authority to the Board of Commissioners to:

1. Examine books, letters, and other documents, verify cash, review other securities, and inspect the Company's assets;
2. Enter the premises, buildings, and offices used by the Company;
3. Request explanations from the Board of Directors and/or other officials regarding any matters related to the management of the Company;
4. Be informed of all policies and actions that have been and will be carried out by the Board of Directors;
5. Request the attendance of the Board of Directors and/or other officials under the Board of Directors, with the knowledge of the Board of Directors, at Board of Commissioners' meetings;
6. Appoint and dismiss a Secretary to the Board of Commissioners;
7. Temporarily dismiss members of the Board of Directors in accordance with the provisions of the Articles of Association;
8. Establish the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, Integrated Governance Committee, and other committees as deemed necessary, considering the Company's capabilities;
9. Engage experts for specific matters and for a certain period at the Company's expense, if deemed necessary;
10. Undertake Company management actions under certain circumstances and for a specified period, in accordance with the provisions of the Articles of Association;
11. Approve the appointment and dismissal of the Corporate Secretary and/or Head of the Internal Audit Unit;
12. Attend Board of Directors' meetings and provide views on matters being discussed; and
13. Exercise other supervisory authorities as long as they do not conflict with laws and regulations, the Articles of Association, and/or resolutions of the General Meeting of Shareholders (GMS).

DUTIES OF THE BOARD OF COMMISSIONERS

Meanwhile, the duties of the Board of Commissioners based on BNI Board of Commissioners Charter are as follows:

1. Provide advice to the Board of Directors in managing the Company;
2. Provide opinions and approvals on the Company's Work Plan and Annual Budget as well as other work plans prepared by the Board of Directors, in accordance with the provisions of the Articles of Association;
3. Monitor the Company's activities, providing opinions and suggestions to the General Meeting of Shareholders (GMS) on any matters deemed important for the Company's management;
4. Report to the Series A Dwiwarna Shareholder in the event of indications of declining Company performance;
5. Propose to the GMS the appointment of a Public Accountant and/or Public Accounting Firm to audit the Company's books;
6. Review and examine periodic reports and annual reports prepared by the Board of Directors and sign the annual report;
7. Provide explanations, opinions, and suggestions to the GMS regarding the Annual Report, if requested;
8. Prepare minutes of the Board of Commissioners' meetings and retain one copy;
9. Report to the Company regarding their share ownership and/or that of their family in the Company and other companies;
10. Submit a report on supervisory duties carried out during the past fiscal year to the GMS;
11. Provide explanations on any matters requested by the Series A Dwiwarna Shareholder, taking into account laws and regulations, particularly those in the Capital Market and Banking sectors;
12. Direct, monitor, and evaluate the implementation of integrated governance, risk management, compliance, and strategic policies of the Company in accordance with laws, the Articles of Association, and/or GMS resolutions;
13. Formulate the Board of Commissioners Charter and the Governance Framework between the Company's Board of Commissioners and the Boards of Commissioners of Subsidiaries, considering regulations, especially in the Banking and Capital Market sectors;
14. Perform other duties related to supervisory and advisory roles, provided they do not conflict with laws, the Articles of Association, and/or GMS resolutions;
15. Approve strategic matters in accordance with the Articles of Association;
16. Report to the Financial Services Authority (OJK) no later than five (5) days after discovering:
    1) Violation of the provisions of laws and regulations in the fields of finance, banking, and those related to the Bank's business activities; and/or
    2) Conditions or potential conditions that could endanger the Company's business continuity;
17. Safeguard all data and information related to the Bank provided by the Board of Directors, in accordance with applicable laws;

18. Provide written approval for legal actions undertaken by the Board of Directors as required by BNI Articles of Association No. 06 dated January 13, 2026, taking into account laws and regulations in the Capital Market and Banking sectors:
    a. To write off the Company's assets within certain value thresholds as determined by the Board of Commissioners, taking into account the prevailing laws and regulations governing State-Owned Enterprises, as follows:
        1. Write-offs due to the transfer/disposal of the Company's fixed assets;
        2. Write-offs due to the transfer/disposal of the Company's other assets;
        3. Write-offs of the Company's fixed assets and/or other assets other than those resulting from transfer/disposal;

        excluding the Company's assets in the course of carrying out its business activities in accordance with applicable laws and regulations, including but not limited to assets in the form of loans, securities, foreclosed collateral, movable assets, and other assets acquired in the course of the Company's business activities, with due regard to the regulations in the capital markets and banking sectors;
    b. To pledge the Company's assets as collateral within certain value thresholds as determined by the Board of Commissioners, excluding the Company's assets in the course of carrying out its business activities in accordance with applicable laws and regulations, including but not limited to assets in the form of loans, securities, foreclosed collateral, movable assets, and other assets acquired in the course of the Company's business activities, with due regard to the regulations in the capital markets and banking sectors;
    c. To enter into cooperation arrangements with business entities or other parties in the form of licensing agreements, management contracts, asset leases, Joint Operations (KSO), Build Operate Transfer (BOT), Build Own Transfer (BoT), Build Transfer Operate (BTO), and other similar cooperation arrangements that do not constitute the Company's ordinary course of business (day-to-day business as usual), within certain value or term limits as determined by the Board of Commissioners;
    d. To make equity investments in subsidiaries, joint ventures, and/or other companies, including investments for the establishment of subsidiaries and/or joint ventures, within certain value thresholds as determined by the Board of Commissioners, except in the context of debt recovery, with due regard to regulations in the capital markets and banking sectors;
    e. To reduce equity participation, including through dilution, in subsidiaries, joint ventures, and/or other companies within certain value thresholds as determined by the Board of Commissioners, except in the context of debt recovery, with due regard to regulations in the capital markets and banking sectors;
    f. To divest equity participation in subsidiaries, joint ventures, and/or other companies within certain value thresholds as determined by the Board of Commissioners, except in the context of debt recovery, with due regard to regulations in the capital markets and banking sectors;
    g. To undertake mergers, consolidations, acquisitions, spin-offs, and dissolution of subsidiaries and joint ventures within certain value thresholds as determined by the Board of Commissioners, with due regard to regulations in the capital markets and banking sectors;
    h. To undertake actions that constitute material transactions as defined under capital market regulations, within certain value thresholds as determined by the Board of Commissioners, except for transactions exempted under applicable capital market regulations;
    i. To determine and amend the Company's logo;
    j. To determine the organizational structure one level below the Board of Directors;
    k. To undertake actions not stipulated in the Company's Work Plan and Budget (RKAP).

The Board of Commissioners' approval regarding letters a, b, c, d, e, f, g, and h above with certain limitations and/or criteria, is determined after obtaining the approval of the Series A Dwiwarna Shareholder or the Holder of the Most Series B and Series C Shares. The limitations and/or criteria by the Board of Commissioners for matters referred to in letters a, b, c, d, e, f, g, and h above is determined after obtaining the approval of the Holder of the Most Series B and Series C Shares. The Board of Commissioners' approval regarding letter k above is determined after obtaining the approval of the Holder of the Most Series B and Series C Shares. The actions of the Board of Directors as referred to in point c above, as long as they are necessary for the implementation of business activities commonly carried out in the banking business sector with due regard to the provisions of laws and regulations, do not require the approval of the Board of Commissioners and/or the GMS.

POLICY ON CONCURRENT POSITIONS OF THE BOARD OF COMMISSIONERS [ACGS D.2.6, D.2.7]

Referring to BNI Board of Commissioners Charter and as stipulated in the Regulation of the Minister of State-Owned Enterprises No. PER-3/ MBU/03/2023 on the Organs and Human Resources of State-Owned Enterprises, each member of BNI Board of Commissioners is permitted to hold concurrent positions as a member of the Board of Commissioners in other business entities, provided it complies with sectoral laws and regulations. Furthermore, in accordance with the Financial Services Authority Regulation (OJK) No. 17 of 2023 concerning Governance Implementation for Commercial Banks, all members of the Bank's Board of Commissioners are prohibited from holding concurrent positions as:

1. A member of the Board of Directors, Board of Commissioners, Sharia Supervisory Board, or Executive Officer in financial institutions or financial companies, whether banking or nonbanking;
2. A member of the Board of Directors, Board of Commissioners, Sharia Supervisory Board, or Executive Officer in more than one (1) nonfinancial institution or company, whether domiciled domestically or abroad;
3. A functional position in banking financial institutions and/or non-banking financial institutions, whether domiciled domestically or abroad;
4. Any other position that may cause a conflict of interest in the performance of duties as a member of the Board of Commissioners; and/or
5. Any other position as stipulated by prevailing laws and regulations.

However, the concurrent positions as referred to above do not include the following:

1. Members of the Board of Commissioners serving as members of the Board of Directors, members of the Board of Commissioners, or executive officers performing supervisory functions in one (1) non-bank subsidiary controlled by the Bank;
2. Non-Independent Commissioners carrying out functional duties on behalf of the Bank's shareholders in the form of legal entities within the Bank and/or the Bank's business group; and/or
3. Members of the Board of Commissioners holding positions in non-profit organizations or institutions, provided that such roles do not cause them to neglect their duties and responsibilities as members of the Board of Commissioners.

POLICY ON CONCURRENT POSITIONS FOR THE BOARD OF COMMISSIONERS, INCLUDING INDEPENDENT COMMISSIONERS [ACGS D.2.6]

To ensure the implementation of Good Corporate Governance principles in carrying out its duties and functions, the Board of Commissioners has established a policy prohibiting concurrent positions for its members. This policy is further regulated in the Board of Commissioners Charter pursuant to the Board of Commissioners Decree No. KEP/017/DK/2025 dated September 19, 2025. Additionally, the prohibition of concurrent positions for the Board of Commissioners is stipulated in BNI GCG Guidelines, which specify that members of the Board of Commissioners are prohibited from holding concurrent positions as:

1. Members of the Board of Directors, members of the Board of Commissioners/Supervisory Board, or Executive Officers in financial institutions or financial companies, both banking and non-banking;
2. Members of the Board of Directors, members of the Board of Commissioners, or Executive Officers in more than one (1) non-financial institution or company, whether publicly listed or non-listed, domiciled domestically or abroad;
3. Holding functional roles in banking financial institutions and/or non-banking financial institutions domiciled domestically or abroad;
4. Administrators of political parties and/or candidates/members of the House of Representatives (DPR), Regional Representative Council (DPD), Provincial Regional House of Representatives (DPRD), and Regency/Municipal Regional House of Representatives;
5. Candidates for regional heads/deputy regional heads and/or regional heads/deputy regional heads, including acting regional heads/deputy regional heads;
6. Other positions that may create conflicts of interest in performing duties as members of the Board of Commissioners; and/or
7. Other positions as stipulated by applicable laws and regulations.

Information regarding the concurrent positions of the Bank's Board of Commissioners as of December 31, 2025, is outlined as follows:

Name	Position at the Bank	Member of the Board of Directors of State-Owned Enterprises, Regional Owned Enterprises, Private Owned Enterprises	Management Board of Political Parties and/or Candidates/ Member of DPR, DPD, DPRD Level I, and DPRD Level II and/or Candidates for Regional Head/ Deputy Regional Head	Other Positions in Accordance with the Provisions of Laws and Regulations	Other Positions that Can Cause a Conflict of Interest	Position in a Subsidiary
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	No	No	No	No	No
Tedi Bharata	Vice President Commissioner	No	No	No	No	No
Vera Febyanthy	Independent Commissioner	No	No	No	No	No
Didik Junaedi Rachbini	Independent Commissioner	No	No	No	No	No
Donny Hutabarat	Commissioner	No	No	No	No	No
Febrio Nathan Kacaribu[1)]	Commissioner	No	No	No	No	No

[1)] Served as a member of the Board of Commissioners since December 15, 2025, and as of December 31, 2025, is still undergoing a fit and proper test by the OJK.

MANAGEMENT OF CONFLICT OF INTEREST FOR THE BOARD OF COMMISSIONERS [ACGS A.8.2]

The policy for managing conflicts of interest within the Bank's Board of Commissioners is clearly outlined in the Conflict of Interest Handling Guidelines No. IN/013/CMP/004 dated May 09, 2025. In these guidelines, the Bank encourages all members of the Board of Commissioners to avoid situations that may potentially create conflicts of interest between personal interests and the interests of the Bank. In the event of a conflict of interest, the Board of Commissioners is prohibited from taking actions that could harm or reduce the Bank's benefits and is required to disclose any potential conflicts of interest in every decision making process. To prevent activities that may lead to conflicts of interest, each member of the Board of Commissioners must always:

1. Prioritize the interests of the Company and avoid actions that may compromise the Company's financial standing in the event of a conflict of interest;
2. Refrain from participating in decision-making processes in situations where conflicts of interest exist;
3. Disclose any familial, financial, managerial, or ownership relationships with other members of the Board of Commissioners and/or members of the Board of Directors and/or the Bank's controlling shareholders and/or other parties related to the Company's business activities; and
4. Make the necessary disclosures if decisions must still be made under circumstances involving a conflict of interest.

PARTICIPATION OF THE BOARD OF COMMISSIONERS IN ASSOCIATIONS AND/ OR PROFESSIONAL ORGANIZATIONS

Several members of BNI Board of Commissioners are registered as active members in various associations or professional organizations. The active participation of Board members in such associations or organizations does not interfere with the fulfillment of their duties and responsibilities as members of the Bank's Board of Commissioners, and as such, it is not categorized as holding concurrent positions.

Details of the participation of current members of the BNI Board of Commissioners in professional associations or organizations are presented as follows:

Name	Position	Position at the Association/Organization
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	-
Tedi Bharata	Vice President Commissioner	Member of the Higher Education Council
Vera Febyanthy	Independent Commissioner	-

Name	Position	Position at the Association/Organization
Didik Junaedi Rachbini	Independent Commissioner	Chairman of the Supervisory Board at the Institute for Development of Economics and Finance (INDEF) Foundation
Donny Hutabarat	Commissioner	-
Febrio Nathan Kacaribu[1)]	Commissioner	-

1) Served as a member of the Board of Commissioners since December 15, 2025, and as of December 31, 2025, is still undergoing a fit and proper test by the OJK.

LOAN POLICY FOR THE BOARD OF COMMISSIONERS [ACGS A.8.3]

BNI does not prohibit and has established a loan policy for the Board of Commissioners, which is implemented in accordance with BNI prevailing credit policies, guided by applicable regulations, and subject to the same terms and conditions as loans granted to non-affiliated parties. The loan policy for the Board of Commissioners is applied based on the principles of an arm's length basis and at market rates, as stipulated in the Corporate Guidelines for Business and Consumer Banking Credit.

Independence of the Board of Commissioners

All members of BNI Board of Commissioners consistently perform their duties and responsibilities independently from management to ensure the effective execution of their functions. Accordingly, at least 50% (fifty percent) of the total members of the Board of Commissioners are Independent Commissioners, which is in line with the Bank's Governance Policy. The involvement of independent parties within the Board of Commissioners in every decision-making process is believed to help ensure that governance bodies are not influenced by conditions that may give rise to conflicts of interest, thereby enabling decisions to be made in the strategic interests of shareholders and the Bank.

At the beginning of each year, every member of the Board of Commissioners signs an independence declaration to affirm their independent status. Additionally, the Board of Commissioners reconfirms whether any situations involving conflicts of interest with the Bank occurred in the past year related to their actions. If there is any change in status that affects the independence of a Board member during their term of office including changes in personal or family share ownership in BNI or in other banks, non-bank financial institutions, or companies, the concerned Board member is required to report and disclose such conflicts of interest to the Bank.

Share Ownership of the Board of Commissioners [ACGS C.1.3]

All members of the Bank's Board of Commissioners have disclosed their share ownership transparently, both in BNI and in other banks or companies. The share ownership of each member of the Board of Commissioners is presented in the table below:

Share Ownership of the Board of Commissioners as of December 31, 2025

Name	Position	Share Ownership	
		BNI	Other Bank or Company
Omar Sjawaldy Anwar	President Commissioner/Independent Commissioner	Nihil	Nihil
Tedi Bharata	Vice President Commissioner	Nihil	Nihil
Vera Febyanthy	Independent Commissioner	Nihil	Nihil
Didik Junaedi Rachbini	Independent Commissioner	Nihil	Nihil
Donny Hutabarat	Commissioner	200	Nihil
Febrio Nathan Kacaribu[1)]	Commissioner	Nihil	Nihil

[1)] Served as a member of the Board of Commissioners from December 15, 2025, and until December 31, 2025, is still undergoing a fit and proper test by the OJK.

Board of Commissioners Meeting Including Joint Meeting with the Board of Directors

Policies and Implementation of Board of Commissioners Meetings

Based on the Decree of the Board of Commissioners No. KEP/017/DK/2025, dated September 19, 2025, concerning the Board of Commissioners Charter, which is further elaborated in the applicable Rules and Procedures governing the Board of Commissioners and the Joint Meetings of the Board of Commissioners and the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk, forming an integral and inseparable part of the said Decree, the Board of Commissioners has established the procedures and mechanisms for the conduct of meetings of the Board of Commissioners and the Board of Directors, which principally stipulate provisions regarding the following matters:

hedule of Meetings;
2. Meeting Agenda;
3. Meeting Venue;
4. Meeting Participants;
5. Proxies and Representation;
6. Meeting Notifications;
7. Attendance and Decision-Making Process;
8. Documentation and Administrative Management of Meeting Minutes;
9. Meeting Confidentiality;
10. Board of Commissioners' Resolutions Outside of Meetings;
11. Board of Commissioners Meetings via Teleconference Media; and
12. Format and Presentation Materials for Meetings.

As stipulated in the Procedures and Mechanisms for Board of Commissioners Meetings, the Bank categorizes meetings into the following types:

1. Board of Commissioners Meetings (Radekom), Including Internal Meetings of the Board of Commissioners and Board of Commissioners Meetings with Invitees Directors of specific Divisions/Sectors or Senior Executive Vice Presidents (SEVP); and
2. Joint Meetings of the Board of Directors and Board of Commissioners (Radikom), attended by both Boards along with the Corporate Secretary and the Secretary to the Board of Commissioners.

In general, the implementation of the Board of Commissioners Meetings is conducted in accordance with the provisions of the Financial Services Authority Regulation (POJK) No. 33/POJK.04/2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Public Companies, as well as with reference to the BNI Board of Commissioners Charter:

Meeting Organization	1. All decisions of the Board of Commissioners are taken in a Board of Commissioners meeting. 2. The Board of Commissioners must hold a periodic Board of Commissioners Meeting at least 1 (one) time every 2 (two) months. 3. The Board of Commissioners must hold a Board of Commissioners and the Board of Directors Meeting periodically at least 1 (one) time every 4 (four) months. 4. The Board of Commissioners Meeting as referred to in points 2 and 3 is held if attended by the majority of members of the Board of Commissioners. 5. The Board of Commissioners must determine the rules of procedure for the Board of Commissioners meeting. 6. The Board of Commissioners may hold a meeting at any time at the request of 1 (one) or several members of the Board of Commissioners or the Board of Directors, stating the matters to be discussed. 7. The Board of Commissioners may also make valid decisions without holding a Board of Commissioners Meeting provided that all members of the Board of Commissioners have been notified in writing and all members of the Board of Commissioners give their approval regarding the proposal submitted in writing and sign the approval. Decisions taken in this manner have the same force as decisions taken validly in a Board of Commissioners Meeting. 8. In the event that a member of the Board of Commissioners is unable to attend the Meeting physically, then the member of the Board of Commissioners may attend the Meeting of the Board of Commissioners face-to-face by utilizing information technology. 9. Every member of the Board of Commissioners who personally in any way, either directly or indirectly, has an interest in a transaction, contract or proposed contract in which the Company is a party, must declare the nature of his/her interest in a Meeting of the Board of Commissioners and shall not be entitled to participate in voting on matters relating to the transaction or contract.

Meeting Summons	1. The summons for the Board of Commissioners Meeting must be made by the President Commissioner, in the event that the President Commissioner is unable to attend, the summons for the Meeting must be made by the Deputy President Commissioner. However, in the event that the Deputy President Commissioner is unable to attend for any reason, the summons for the Meeting must be made by one of the members of the Board of Commissioners. 2. The summons for the Board of Commissioners Meeting must be made in writing and delivered or submitted directly to each member of the Board of Commissioners with adequate receipt or by registered mail or by courier service or by telex, facsimile, or electronic mail (e-mail) no later than 5 (five) working days before the meeting is held, excluding the date of the summons and the date of the meeting or in a shorter time if in urgent circumstances. [ACGS D.3.4] 3. The summons for the Board of Commissioners Meeting must include the agenda, date, time, and place of the meeting. The Board of Commissioners Meeting is held at the Company's domicile or at another place within the territory of the Republic of Indonesia or at the Company's place of business activities 4. The materials for the Board of Commissioners Meeting shall be distributed to all meeting participants no later than 5 (five) working days before the meeting is held, unless the meeting is held outside the schedule, the meeting materials may be delivered before the meeting is held. [ACGS D.3.6] 5. The summons as mentioned above is not required for meetings that have been scheduled based on the decision of the Board of Commissioners Meeting held previously.
Attendance and Chairmanship of Board of Commissioners Meetings	1. The Board of Commissioners Meeting is led by the President Commissioner, if the President Commissioner is absent or prevented, then the Deputy President Commissioner who leads the Meeting of the President Commissioner or a member of the Board of Commissioners appointed in writing by the President Commissioner who leads the Meeting if at the same time the Deputy President Commissioner is absent or prevented, or a member of the Board of Commissioners appointed by the Deputy President Commissioner who leads the Meeting of the Board of Commissioners if at the same time the President Commissioner is absent or prevented and does not make an appointment. 2. In the event that the Deputy President Commissioner does not make an appointment, then one of the Board of Commissioners who has served the longest as a member of the Board of Commissioners acts as the Chair of the Board of Commissioners Meeting. In the event that the member of the Board of Commissioners who has served the longest as a member of the Company's Board of Commissioners is more than 1 (one) person, then the member of the Board of Commissioners as referred to in number 2 above who is the oldest in age acts as the Chair of the Board of Commissioners Meeting. 3. The implementation of the Board of Commissioners Meeting must be attended by all members of the Board of Commissioners physically at least 2 (two) times in 1 (one) year.
Quorum and Decision Making [ACGS D.3.4]	1. The Board of Commissioners Meeting is valid and has the right to make binding decisions if attended and/or represented by more than 1/2 (one half) of the total number of members of the Board of Commissioners. 2. In the event that there is more than one proposal, a re-election shall be held so that one of the proposals obtains more than 1/2 (one half) of the total number of votes cast. [ACGS D.3.4] 3. In the Board of Commissioners Meeting, each member of the Board of Commissioners has the right to cast 1 (one) vote and an additional 1 (one) vote for each other member of the Board of Commissioners legally represented at the meeting. 4. Blank votes (abstain) are considered to agree to the proposal submitted at the meeting. Invalid votes are considered non-existent and are not counted in determining the number of votes cast at the meeting. 5. Voting regarding a person is carried out using a closed ballot without a signature, while voting regarding other matters is carried out verbally, unless the Chairperson of the Meeting determines otherwise without any objection based on the majority of votes from those present. 6. Decisions of the Board of Commissioners Meeting must be taken based on deliberation to reach consensus. If a decision based on deliberation for consensus is not reached, then the decision must be taken by voting based on the affirmative votes of more than 1/2 (one half) of the total valid votes cast at the relevant meeting. 7. All decisions of the Board of Commissioners are binding on all members of the Board of Commissioners.
Minutes of Meeting	1. The results of the Board of Commissioners Meeting must be stated in the Minutes of Meeting. The Minutes of Meeting must be made by a person present at the meeting appointed by the Chairperson of the Meeting and then signed by all members of the Board of Commissioners present and submitted to all members of the Board of Commissioners. 2. The results of the Board of Commissioners and the Board of Directors Meeting must be stated in the Minutes of Meeting. The Minutes of Meeting must be made by a person present at the meeting appointed by the Chairperson of the Meeting and then signed by all members of the Board of Commissioners and members of the Board of Directors present and submitted to all members of the Board of Commissioners and members of the Board of Directors. The Minutes of Meeting as referred to in points 1 and number 2 above contain the matters discussed including dissenting opinions that occur along with the reasons for the differences of opinion, if any, and the matters decided. 3. In the event that there are members of the Board of Commissioners and/or members of the Board of Directors who do not sign the results of the meeting as referred to in points 1 and 2 above, the person concerned must state the reasons in writing in a separate letter attached to the Minutes of Meeting. 4. The Minutes of Meeting as referred to in points 1 and number 2 above must be documented by the Company. 5. Minutes of the Board of Commissioners Meeting are valid evidence for members of the Board of Commissioners and for third parties regarding the decisions taken at the relevant Meeting.
Decision Outside the Board of Commissioners Meeting	The Board of Commissioners may also adopt valid decisions without convening a Board of Commissioners meeting, provided that all members of the Board of Commissioners have been notified in writing and all members have given their written approval of the proposed resolution and signed the said approval. Decisions made in this manner shall have the same legal force as decisions validly made in a Board of Commissioners meeting.

Attendance of the Board of Commissioners in Board of Commissioners Meetings, Joint Meetings with the Board of Directors, and General Meeting of Shareholders (GMS) [ACGS D.3.2, D.3.3]

In 2025, the Board of Commissioners held a total of 36 (thirty-six) Board of Commissioners Meetings, including 8 (eight) joint Meetings with the Board of Directors, 1 (one) Annual General Meeting of Shareholders (AGM), and 1 (one) Extraordinary General Meeting of Shareholders (EGM). The following is the frequency and attendance of each member of the Board of Commissioners at the Meetings:

Name	Position	Board of Commissioners Meetings			BOC-BOD Meetings			2025 AGMS 2024 Financial Year			2025 EGMS		
		Total and (%) Attendance			Total and (%) Attendance			Total and (%) Attendance			Total and (%) Attendance		
		Total Meeting	Attendance	%	Total Meeting	Attendance	%	Total Meeting	Attendance	%	Total Meeting	Attendance	%
Pradjoto[1]	President Commissioner/ Independent Commissioner	7	7	100%	1	1	100%	1	1	100%	-	-	-
Pahala Nugraha Mansury[2]	Vice President Commissioner	10	10	100%	1	1	100%	1	1	100%	-	-	-
Sigit Widyawan[2]	Independent Commissioner	10	9	90%	1	1	100%	1	1	100%	-	-	-
Askolani[2]	Commissioner	10	9	90%	1	1	100%	1	1	100%	-	-	-
Asmawi Syam[1]	Independent Commissioner	7	7	100%	1	1	100%	1	1	100%	-	-	-
Septian Hario Seto[1]	Independent Commissioner	7	7	100%	1	1	100%	1	1	100%	-	-	-
Iman Sugema[1]	Independent Commissioner	7	7	100%	1	1	100%	1	1	100%	-	-	-
Erwin Rijanto Slamet[2]	Independent Commissioner	10	9	90%	1	1	100%	1	1	100%	-	-	-
Fadlansyah Lubis[2]	Commissioner	10	10	100%	1	1	100%	1	1	100%	-	-	-
Robertus Billitea[2]	Commissioner	10	9	90%	1	1	100%	1	1	100%	-	-	-
Mohamad Yusuf Permana[2]	Commissioner	10	10	100%	1	1	100%	1	1	100%	-	-	-
Omar Sjawaldy Anwar[3]	President Commissioner/ Independent Commissioner	26	26	100%	7	7	100%	-	-	-	1	1	100%
Tedi Bharata[4]	Vice President Commissioner	26	24	92%	7	7	100%	-	-	-	1	0	0%
Vera Febyanthy[5]	Independent Commissioner	20	20	100%	6	6	100%	-	-	-	1	1	100%
Didik Junaedi Rachbini[5]	Independent Commissioner	20	20	100%	6	6	100%	-	-	-	1	1	100%
Suminto[6]	Commissioner	5	5	100%	2	2	100%	-	-	-	1	1	100%
Donny Hutabarat[7]	Commissioner	14	13	93%	4	4	100%	-	-	-	1	1	100%
Febrio Nathan Kacaribu[8]	Commissioner	-	-	-	-	-	-	-	-	-	-	-	-

[1] Effective as a member of the Board of Commissioners until February 20, 2025
[2] Effective as a member of the Board of Commissioners until March 26, 2025
[3] Effective as a member of the Board of Commissioners since June 30, 2025
[4] Effective as a member of the Board of Commissioners since June 5, 2025
[5] Effective as a member of the Board of Commissioners since August 13, 2025
[6] Effective as a member of the Board of Commissioners since August 13, 2025 and ending on October 8, 2025
[7] Effective as a member of the Board of Commissioners since October 16, 2025
[8] Served as a member of the Board of Commissioners since December 15, 2025, but not yet effective as it is still undergoing the OJK Fit & Proper Test

Agenda, Dates, and Participants of the Board of Commissioners Meetings in 2025

Based on the recapitulation results throughout 2025, the Board of Commissioners of BNI has held 36 (thirty-six) Board of Commissioners Meetings, including 8 (eight) joint Meetings with the Board of Directors. During the period from March 26, 2025 to June 29, 2025, the Board of Commissioners was unable to hold meetings due to the absence of an effective Board of Commissioners as they were still undergoing the

OJK Fit & Proper Test. However, during that period, the Board of Commissioners actively held 11 (eleven) internal consolidation meetings and discussions with the Directors in order to orient themselves and gain a deeper understanding of BNI condition in preparation for carrying out the duties and functions of the Board of Commissioners. The attendance rate of the Board of Commissioners at these meetings was high, with an average attendance of 97%, reflecting the commitment of all members of the Board of Commissioners to consistently and effectively carry out their supervisory role and provide strategic advice to the Board of Directors.

The following is a description of the agenda, dates of implementation, and attendance rates of each member of the Board of Commissioners in the meetings held throughout this year:

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
1	January 9, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Credit Consultation to the Board of Commissioners 2. Approval of DPLK BNI Risk Management Policy Review 3. Supervisory Report on DPLK BNI Business Plan for Semester 2 - 2024 4. Approval of Updates to BNI APU, PPT, and PPPSPM Policies and Procedures 5. Approval of Updates to DPLK BNI APU, PPT, and PPPSPM Policies and Procedures	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
2	January 16, 2025	**Board of Commissioners and the Board of Directors Meeting** 1. Closing Meeting of the Audit of BNI Financial Statements for the 2024 fiscal year 2. BNI Performance, Subsidiary Companies' Performance, and Realization of BNI Business Plan for the Fourth Quarter of 2024 3. BNI Health Level and Risk Profile as of December 31, 2024 4. Proposed Schedule and Agenda for the 2024 Annual General Meeting of Shareholders 5. Credit Consultation to the Board of Commissioners	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
3	January 30, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Approval of Anti-Fraud Strategy Policy 2. Credit Consultation with the Board	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Absent 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
4	February 6, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. 2025 Audit Plan and Consultation 2. BNI Share Buyback Plan 3. Determination of Estimated Price (HPS) for the Procurement of Public Accounting Firm (KAP) in 2025 4. Credit Consultation to the Board of Commissioners	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
5	February 11, 2025	**Board of Commissioners Meeting invites relevant Directors** Credit Consultation to the Board of Commissioners	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
6	February 13, 2025	**Board of Commissioners Meeting invites relevant Directors** One on One Meeting Nominated Talent BNI	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
7	February 18, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Collegial and Individual KPI of the Board of Directors for the 2024 period 2. One on One Meeting KPI	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
8	February 27, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Credit Consultation to the Board of Commissioners 2. Follow-up on problematic debtors	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
9	March 13, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Appointment of Chair of BNI Annual GMS for Fiscal Year 2024 2. Determination of Public Accounting Firm (KAP) for Fiscal Year 2025 3. Proposal for the Use of BNI Net Profit for Fiscal Year 2024 4. Follow-up on the Board of Commissioners' Suggestions and Advice on the Board of Commissioners' Working Visit to BNI Overseas Offices	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Absent 10. Present 11. Absent	Hybrid
10	March 20, 2025	**The Board of Commissioners meeting invites the relevant Directors** 1. Approval of BNI 2025 Risk Appetite Statement (RAS) Review 2. Follow-up on the Board of Commissioners' Recommendations and Advice on the Realization of Credit Write-offs consulted to the Board of Commissioners	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Billitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
11	April 10, 2025	**Internal Consolidation of the Board of Commissioners** 1. Orientation of the Board of Commissioners 2. Internal Discussion	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
12	April 25, 2025	**Discussion of the Board of Commissioners inviting the relevant Directors** 1. BNI Performance, RBB Realization, and Realization of the Collegial KPI of the Board of Directors for the First Quarter of 2025 2. Funding Strategy 3. BNI Risk Profile as of March 31, 2025 4. BNI Payment Service Provider (PJP) Report to Bank Indonesia	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
13	April 29, 2025	**Board of Commissioners Discussion invites relevant Directors** 1. Urgent Matters Requiring Approval and/or Advice and Recommendations from the Board of Commissioners 2. BNI Operational Risk Management Framework 3. BNI DPLK Governance Report for the 2024 Period	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
14	May 15, 2025	**Board of Commissioners discussion invites relevant Directors** Business Development Roadmap	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
15	May 22, 2025	**Board of Commissioners discussion invites relevant Directors** Key Points of Audit Results and Follow-up on BNI Audit Results	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
16	May 27, 2025	**Board of Commissioners discussion invites relevant Directors** Human Resources Strategy of BNI	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
17	June 5, 2025	**Board of Commissioners discussion invites relevant Directors** 1. BNI Network Strategy 2. BNI Operations Risk and Operations Strategy 3. BNI Performance as of April 30, 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
18	June 12, 2025	**Board of Commissioners discussion invites Directors** Marketing & Branding Strategy	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
19	June 19, 2025	**Board of Commissioners discussion invites relevant Directors** 1. CRM (Customer Relationship Management) Strategy and Business Process Automation related to Corporate Credit Processes 2. Implementation of POJK No. 30 of 2024 concerning the Establishment of PIKK	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
20	June 24, 2025	**Board of Commissioners Discussion invites relevant Directors** 1. BNI performance as of May 31, 2025 2. Revision of the Bank's Business Plan (RBB) / Company Work Plan and Budget (RKAP) 2025 BNI	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present	Hybrid
21	June 26, 2025	**Board of Commissioners discussion invites relevant Directors** Influencing Perception from Brand Perspective	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
22	June 30, 2025	**Board of Commissioners Meeting inviting relevant Directors** Approval of Subsidiary Company Management	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
23	July 1, 2025	**Board of Commissioners meeting inviting the Board of Directors** Improvements/Refinements to the Governance of Reporting by the Board of Directors and Board of Commissioners Committees	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
24	July 3, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Approval of BNI 2025 Bank Credit Policy (KPB) Review 2. Credit Consultation with the Board of Commissioners	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
25	July 17, 2025	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance, Bank Health Level, and BNI Risk Profile as of June 30, 2025 (Second Quarter of 2025) 2. Proposal for BNI Board of Directors Organizational Restructuring 3. Internal Control Over Financial Reporting / ICOFR for the First Half of 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
26	July 31, 2025	**Board of Commissioners Meeting inviting relevant Directors** BNI Information Technology (IT) Implementation	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
27	August 7, 2025	**Board of Commissioners Meeting inviting relevant Directors** Approval of BNI Internal Audit Head Replacement	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
28	August 21, 2025	**Board of Commissioners and the Board of Directors Meeting** BNI Performance as of July 31, 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
29	September 11, 2025	**The Board of Commissioners Meeting invited the relevant Directors** 1. New Software Development Life Cycle (SDLC) 2. AI Adoption and Analytics 3. Digitalization of Branches and Regions	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
30	September 18, 2025	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance as of August 31, 2025 2. Evaluation of Consumer Protection Implementation and Implementation of Financial Literacy and Inclusion Improvement	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
31	September 25, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Kick-off Meeting for BNI Financial Statement Audit for the Fiscal Year Ending December 31, 2025 2. Results of the 2025 Risk Maturity Index (RMI) Assessment	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
32	October 2, 2025	**Board of Commissioners Meeting invites relevant Directors** Evaluation of the Implementation of BNI Anti-Fraud Strategy	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
33	October 9, 2025	**Board of Commissioners meeting invites relevant Directors** 1. Strategy for Managing Fund 2. Evaluation of the Effectiveness of BNI Internal Control System and the Implementation of BNI Internal Audit Duties	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
34	October 21, 2025	**Board of Commissioners and the Board of Directors Meeting** BNI individual risk profile as of September 30, 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
35	October 23, 2025	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance as of September 30, 2025 2. Evaluation of Government	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
36	October 30, 2025	**The Board of Commissioners Meeting invites the relevant Directors** Approval of the 2026 Company Work Plan and Budget (RKAP), 2026 Board of Directors Collegial KPI, Company Long-Term Plan (RJPP) 2026-2030, Sustainable Finance Action Plan (RAKB) 2026, Macroprudential Inclusive Financing (RPIM) targets for 2026	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
37	November 4, 2025	**The Board of Commissioners meeting invites the relevant Directors** Update on the plan for the BNI Extraordinary General Meeting of Shareholders (EGMS)	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
38	November 6, 2025	**The Board of Commissioners meeting invites the relevant Directors** 1. Approval of the Proposed 2. 2025 Board of Directors KPI	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
39	November 11, 2025	**The Board of Commissioners meeting invites the relevant Directors** Update on BNI Recovery Plan Document for 2025/2026	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid

No.	Date	Meeting Agenda	Meeting Participants	Attendance	Notes
40	November 20, 2025	**Board of Commissioners Meeting invites relevant Directors** Evaluation of BNI Corporate Transformation	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
41	November 27, 2025	**Board of Commissioners Meeting invites relevant Directors** 1. Approval of Credit Facilities 2. Implementation of BNI Support for the Merah Putih Village/Sub-District Cooperative Program	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Absent 3. Present 4. Present 5. Present	Hybrid
42	December 2, 2025	**Board of Commissioners Meeting invites relevant Directors** Proposed decision of the 2025 BNI EGMS	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
43	December 9, 2025	**Board of Commissioners Meeting invites relevant Directors** Approval of the Principle Permit for Procurement and Procurement Budget for Public Accounting Firms (KAP) for the 2026 Fiscal Year	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Absent 3. Present 4. Present 5. Present	Hybrid
44	December 11, 2025	**Board of Commissioners and the Board of Directors Meeting** 1. BNI Performance as of October 31, 2025 2. Realization of Write-offs per Business Segment	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
45	December 16, 2025	**Board of Commissioners Meeting with relevant Directors** Discussion of BNI Fraud	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)] 6. Febrio Nathan Kacaribu[8)]	1. Present 2. Present 3. Present 4. Present 5. Absent 6. Present	Hybrid
46	December 18, 2025	**Board of Commissioners Meeting with relevant Directors** 1. Approval of the Review of the General Risk Management Policy, General Internal Control System Policy, and General Integrated Risk Management and Integrated Capital Policy for 2025 2. Results of the Board of Commissioners' Working Visit to Overseas Offices	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)] 6. Febrio Nathan Kacaribu[8)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
47	December 23, 2025	**Board of Commissioners and the Board of Directors Meeting** Evaluation of the implementation of the Anti-Fraud Strategy for both Internal Fraud and External Fraud	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)] 6. Febrio Nathan Kacaribu[8)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Absent	Hybrid

Internal consolidation and discussions conducted during the period did not result in an effective Board of Commissioners as they were still undergoing the OJK Fit & Proper Test.

1) Effectively served as a member of the Board of Commissioners until February 20, 2025
2) Effectively served as a member of the Board of Commissioners until March 26, 2025
3) Effectively served as a member of the Board of Commissioners since June 30, 2025
4) Effectively served as a member of the Board of Commissioners since June 5, 2025
5) Effectively served as a member of the Board of Commissioners since August 13, 2025
6) Effective as a member of the Board of Commissioners from August 13, 2025 to October 8, 2025
7) Effective as a member of the Board of Commissioners from October 16, 2025
8) Appointed as a member of the Board of Commissioners from December 15, 2025, but not yet effective as the OJK Fit & Proper Test is still ongoing

Joint Meetings of the Board of Commissioners and the Board of Directors

Based on POJK No. 17 of 2023, the Board of Commissioners is required to hold joint meetings with the Board of Directors at least once every four (4) months. During 2025, the Board of Commissioners and Board of Directors held eight (8) joint meetings with the following agenda, dates, and participants:

No.	Tanggal	Agenda Rapat	Peserta Rapat	Kehadiran	Keterangan
1	January 16, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** 1. Audit Closing Meeting for BNI Financial Statements for 2024 fiscal year 2. BNI Performance, Subsidiary Performance, and BNI RBB Realization for the Fourth Quarter of 2024 3. BNI's Health Level and Risk Profile as of December 31, 2024 4. Proposed Schedule and Agenda for the 2024 Annual General Meeting of Shareholders 5. Credit Consultation with the Board of Commissioners	1. Pradjoto[1)] 2. Pahala Nugraha Mansury[2)] 3. Sigit Widyawan[2)] 4. Askolani[2)] 5. Asmawi Syam[1)] 6. Septian Hario Seto[1)] 7. Iman Sugema[1)] 8. Mohamad Yusuf Permana[2)] 9. Erwin Rijanto Slamet[2)] 10. Fadlansyah Lubis[2)] 11. Robertus Biilitea[2)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present 7. Present 8. Present 9. Present 10. Present 11. Present	Hybrid
2	July 17, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** 1. BNI Performance, Bank Health Level, and BNI Risk Profile as of June 30, 2025 (Second Quarter of 2025) 2. Proposed Organizational Restructuring of the Board of Directors of BNI 3. Internal Control Over Financial Reporting / ICOFR for the First Half of 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
3	August 21, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** BNI Performance as of July 31, 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Absent 5. Present 6. Present	Hybrid
4	September 18, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** 1. BNI Performance as of August 31, 2025 2. Evaluation of Consumer Protection Implementation and Implementation of Financial Literacy and Inclusion Improvement	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Suminto[6)] 6. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Present	Hybrid
5	October 21, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** BNI Individual Risk Profile as of September 30, 2025	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
6	October 23, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** 1. BNI Performance as of September 30, 2025 2. Evaluation of Government SAL Fund Placement at BNI	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
7	December 11, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** 1. BNI Performance as of October 31, 2025 2. Realization of Write-offs per Business Segment	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)]	1. Present 2. Present 3. Present 4. Present 5. Present	Hybrid
8	December 23, 2025	**Board of Commissioners Meeting and Board of Directors Meeting** Evaluation of the implementation of Anti-Fraud Strategies	1. Omar Sjawaldy Anwar[3)] 2. Tedi Bharata[4)] 3. Vera Febyanthy[5)] 4. Didik Junaedi Rachbini[5)] 5. Donny Hutabarat[7)] 6. Febrio Nathan Kacaribu[8)]	1. Present 2. Present 3. Present 4. Present 5. Present 6. Absent	Hybrid

1) Effectively served as a member of the Board of Commissioners until February 20, 2025.
2) Effectively served as a member of the Board of Commissioners until March 26, 2025.
3) Effectively served as a member of the Board of Commissioners since June 30, 2025.
4) Effectively served as a member of the Board of Commissioners since June 5, 2025.
5) Effectively served as a member of the Board of Commissioners since August 13, 2025.
6) Effective as a member of the Board of Commissioners from August 13, 2025 to October 8, 2025
7) Effective as a member of the Board of Commissioners from October 16, 2025
8) Appointed as a member of the Board of Commissioners from December 15, 2025, but not yet effective as the OJK Fit & Proper Test is still ongoing

Scheduled Meetings for 2026 [ACGS D.3.1]

The Board of Commissioners has prepared the schedule for the Board of Commissioners Meetings and Joint Meetings with the Board of Directors for 2026 based on the Board of Commissioners' Work Plan and Budget (RKA) established at the beginning of the year. The 2026 meeting plan outlines that, in general, the duties, authorities, and responsibilities of BNI's Board of Commissioners in overseeing management policies, the course of management both regarding the company and the company's business carried out by the Board of Directors based on statutory regulations including duties, authorities and obligations, and responsibilities related to matters which include but are not limited to ensuring the implementation/supervising/ evaluating/ giving direction/assessment of:

a. Bank's strategic policies, including the duties and responsibilities and achievements of the Board of Directors' work plan.
b. Bank Business Plan & Corporate Work Plan and Budget.
c. Bank's Soundness Level, including BNI's Risk Profile and the risk profile of Financial Service Institutions within BNI's Financial Conglomeration.
d. Recovery Action Plan.
e. Internal Control System.
f. Internal audit functions, including follow-ups on audit findings and recommendations from the Bank's internal audit unit, external auditors, supervision results from the Financial Services Authority (OJK), and/or other regulatory authorities.
g. Internal audits in Subsidiaries.
h. Risk Management and Risk Management strategies.
i. Integrated Risk Management within the Financial Conglomeration.
j. Corporate Governance.
k. Integrated Governance within the Financial Conglomeration.
l. Integrated Capital Management.
m. Bank Compliance Function.
n. Implementation of Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) programs, as well as the Prevention of the Financing of Proliferation of Weapons of Mass Destruction (PPPSPM).
o. Implementation of Anti-Fraud Strategy, Whistle Blowing System (WBS), and Significant Fraud Reports.
p. Human Resources.
q. Anti-Bribery Management System (ABMS).
r. Appointment of Public Accounting Firms.
s. Resolution Plan.
t. Implementation of Consumer and Public Protection at BNI.
u. Provision of Payment Services at BNI.
v. Bank Information Technology, covering IT strategic planning, IT governance, IT risk management policies, IT audit planning and implementation, and the management of reliable and effective IT security to ensure the availability, confidentiality, and accuracy of information.
w. Remuneration policy for the Board of Directors, Board of Commissioners, and employees.
x. Macroprudential Inclusive Financing Ratio (RPIM) and RPIM Development Strategy.
y. General Policy on Internal Control Systems (KUSPI) and Internal Control Over Financial Reporting (ICOFR).

TRAINING AND/OR COMPETENCY ENHANCEMENT FOR BOARD OF COMMISSIONERS MEMBERS IN 2025

Policy on Ongoing Training and/or Competency Development [ACGS D.5.2]

In line with rapid industrial transformation and changes in market behavior, BNI is required to be adaptive in responding to these dynamics in order to formulate relevant and competitive business strategies. To address these challenges, BNI requires all employees, including the Board of Commissioners, to continuously improve their competencies through education programs, certification, training, workshops, and sharing sessions. All of these development programs are facilitated by BNI, both internally and through cooperation with external parties (expertise), including the involvement of the Board of Commissioners in competency improvement programs organized by other parties.

By formulating a Board of Commissioners Competency Development Program plan that is aligned with OJK Regulation No. 24 of 2022 concerning the Development of the Quality of Human Resources in Commercial Banks, BNI hopes that each member of the Board of Commissioners can continue to hone their knowledge, skills, and expand their understanding so that they are able to provide strategic direction and effective supervision to the Board of Directors.

Training and/or Competency Enhancement in the 2025 Fiscal Year [ACGS D.5.2]

In 2025, all members of BNI's Board of Commissioners actively participated in several training and/or competency development activities as follows:

No	Training/Workshop/Conference/ Seminar	Date	Venue	Type of Education	Organizer
Omar Sjawaldy Anwar					
1	Risk Management Certification Training Program: Risk Management Certification Scheme Material Level/Qualification 6 Without Levels	April 16-17, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
2	Fit & Proper Test Training Program: In-depth Training on Financial Services Authority Regulations (POJK) Regarding Bank Products and Activities	April 22-23, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
3	Executive Overview for Board of Commissioners	April 24, 2025	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia
4	Fit & Proper Test Briefing by BNI Internal	April 30, 2025 and May 2, 2025	Jakarta	Offline	Corporate Secretary BNI
Tedi Bharata					
1	Risk Management Certification Refreshment Program: Risk Management Certification Scheme Material Level/Qualification 6 Non-Tiered	April 17, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
2	Fit & Proper Test Training Program: In-depth Training on Financial Services Authority Regulations (POJK) Regarding Bank Products and Activities	April 22-23, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
3	Executive Overview for Board of Commissioners	April 24, 2025	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia
4	Fit & Proper Test Briefing by BNI Internal	April 30, 2025 and May 2, 2025	Jakarta	Offline	Corporate Secretary BNI
5	Compliance Forum: "Decision Making based on the Business Judgment Rule Principle in the context of Good Corporate Governance and Anti-Corruption"	September 16, 2025	Jakarta	Offline	BNI University
Febrio Nathan Kacaribu*					
1	OJK Fit & Proper Test Briefing by BNI Internal	December 30, 2025	Jakarta	Offline	Corporate Secretary BNI
Donny Hutabarat					
1	Risk Management Certification Training Program: Risk Management Certification Scheme Material Level/Qualification 6 Without Levels	April 16-17, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
2	Fit & Proper Test Training Program: In-depth Training on Financial Services Authority Regulations (POJK) Regarding Bank Products and Activities	April 22-23, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
3	Executive Overview for Board of Commissioners	April 24, 2025	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia
4	Fit & Proper Test Briefing by BNI Internal	April 30, 2025 and May 2, 2025	Jakarta	Offline	Corporate Secretary BNI
5	Compliance Forum: "Decision Making based on the Business Judgment Rule Principle in the context of Good Corporate Governance and Anti-Corruption"	September 16, 2025	Jakarta	Offline	BNI University
Vera Febyanthy					
1	Risk Management Certification Training Program: Risk Management Certification Scheme Material Level/Qualification 6 Without Levels	April 16-17, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
2	Fit & Proper Test Training Program: In-depth Training on Financial Services Authority Regulations (POJK) Regarding Bank Products and Activities	April 22-23, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)

No	Training/Workshop/Conference/ Seminar	Date	Venue	Type of Education	Organizer
3	Executive Overview for Board of Commissioners	April 24, 2025	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia
4	Fit & Proper Test Briefing by BNI Internal	April 30, 2025 and May 2, 2025	Jakarta	Offline	Corporate Secretary BNI
5	Workshop Program on the Authority and Duties of the Risk Monitoring Committee and its Instruments	May 8, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
6	Compliance Forum: "Decision Making based on the Business Judgment Rule Principle in the context of Good Corporate Governance and Anti-Corruption"	September 16, 2025	Jakarta	Offline	BNI University
Didik Junaedi Rachbini					
1	Risk Management Certification Training Program: Risk Management Certification Scheme Material Level/Qualification 6 Without Levels	April 16-17, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
2	Fit & Proper Test Training Program: In-depth Training on Financial Services Authority Regulations (POJK) Regarding Bank Products and Activities	April 22-23, 2025	Jakarta	Offline	Indonesia Risk Professional Association (IRPA)
3	Executive Overview for Board of Commissioners	April 24, 2025	Jakarta	Offline	Lembaga Pengembangan Perbankan Indonesia
4	Fit & Proper Test Briefing by BNI Internal	April 30, 2025 and May 2, 2025	Jakarta	Offline	Corporate Secretary BNI

*) Appointed as a member of the Board of Commissioners since December 15, 2025, but not yet effective as he is still undergoing the OJK Fit & Proper Test.

ORIENTATION AND INTRODUCTION PROGRAM FOR NEW BOARD OF COMMISSIONERS MEMBERS [ACGS D.5.1]

Orientation and Introduction Program Policy for New Commissioners

Based on the Board of Commissioners Decree No. KEP/024/DK/2024 dated October 22, 2024, regarding the Charter of the Board of Commissioners as the Guideline and Code of Conduct for the Board of Commissioners, it is stipulated that every newly appointed member of the Board of Commissioners must undergo an orientation and introduction program concerning the performance of their duties and responsibilities at the Bank.

The purpose of this program is to provide a comprehensive understanding and overview of the Bank's general conditions, values, vision and mission, business activities, and subsidiaries, as well as to socialize the policies, procedures, and implementation of good corporate governance within the Bank. The program also demonstrates the Bank's compliance with the Ministry of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 dated March 3, 2023, regarding the Governance Guidelines and Significant Corporate Activities of State-Owned Enterprises, Article 43, which mandates that newly appointed members of the Board of Commissioners/Supervisory Board and the Board of Directors must receive an introduction program regarding the respective State-Owned Enterprise. The orientation program for new members of the Board of Commissioners should at least receive materials in the form of document delivery, presentation, or explanation that can be done by the Board of Directors, Corporate Secretary, related divisions or units, as well as experts from external sources, which in general include the following information or matters:

1. The Bank's vision, mission, organizational structure, business activities, and operational network;
2. The Annual Report, the Company's Work Plan and Budget (RKAP), the Bank's Business Plan (RBB), the Company's Code of Ethics, BNI's Work Culture, the Board of Commissioners' Code of Conduct, the Corporate Governance Handbook, and the Company's Articles of Association;
3. Good Corporate Governance (including multiple positions, share ownership, and Independent Commissioners);
4. The duties, authority, and responsibilities of the Board of Commissioners and the Board of Directors, delegation of authority, and the limitations of the Board of Commissioners' authority in overseeing the Company based on applicable laws and regulations;

5. The Committees under the Board of Commissioners that are formed and directly accountable to the Board of Commissioners, the Secretary of the Board of Commissioners, and the Secretariat of the Board of Commissioners that support the smooth execution of the Board of Commissioners' duties; and
6. The remuneration and benefits provided to members of the Board of Commissioners.

Implementation of the Orientation and Introduction Program for New Commissioners in 2025

During 2025, BNI facilitated an orientation and introduction program for members of the Board of Commissioners, which was carried out as follows:

Name	Position	Subject/Material
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	1. Briefing on the duties and responsibilities of the BNI Board of Commissioners on April 10, 2025, covering: • BNI's vision, mission, and organizational structure; • Duties and functions of the Board of Commissioners; • Good Corporate Governance of the Board of Commissioners; • Committees under the Board of Commissioners, as well as the Secretary of the Board of Commissioners and the Secretariat of the Board of Commissioners, which assist in the smooth running of the Board of Commissioners' duties; • Risk Management Certification; • Provisions regarding remuneration, facilities, and allowances for members of the Board of Commissioners. 2. Briefing on the development of BNI's internal conditions on April 30, 2025, and May 2, 2025, including: • Corporate Plan • Bank Business Plan (RBB) and Company Work Plan and Budget (RKAP) • Financial Performance of BNI and Subsidiaries • BNI Business • Risk Management, Legal, Audit & Compliance Issues 3. Briefing on General Banking Knowledge on April 22-24, 2025, including: • Prudential Banking & Indonesian Banking System (SPI) • Good Corporate Governance (Role of the Board of Commissioners), Risk Management and Compliance (GRC) • Asset Liability Management • Internal Audit • Sharing session related to the Fit & Proper Test process for Commissioner Candidates
Tedi Bharata	Vice President Commissioner	
Vera Febyanthy	Independent Commissioner	
Didik Junaedi Rachbini	Independent Commissioner	
Donny Hutabarat	Commissioner	
Febrio Nathan Kacaribu*	Commissioner	1. Briefing on the duties and responsibilities of the BNI Board of Commissioners on December 23, 2025, covering: • BNI's vision, mission, and organizational structure; • Duties and functions of the Board of Commissioners; • Good Corporate Governance of the Board of Commissioners; • Committees under the Board of Commissioners, as well as the Secretary of the Board of Commissioners and the Secretariat of the Board of Commissioners, which assist in the smooth running of the Board of Commissioners' duties; • Risk Management Certification; • Provisions regarding remuneration, facilities, and allowances for members of the Board of Commissioners. 2. Briefing on the development of BNI's internal conditions on December 30, 2025, including: • Corporate Plan • Bank Business Plan (RBB) and Company Work Plan and Budget (RKAP) Other briefings will be held in 2026.

*) Appointed as a member of the Board of Commissioners since December 15, 2025, but not yet effective as he is still undergoing the OJK Fit & Proper Test.

RISK MANAGEMENT CERTIFICATION

BNI is committed to improving the capacity and supervisory role of the Board of Commissioners by encouraging the active participation of each member in the Risk Management certification and alignment program. All of these initiatives are carried out in accordance with POJK Regulation No. 24/2022, SEOJK Regulation No. 28/2022, and OJK Letter No. S-11/D.3/2024, as a manifestation of BNI's seriousness in ensuring high-quality governance and risk management.

In addition, the Bank also requires the Board of Commissioners to participate in the Risk Management Certification Refreshment Program with the aim of maintaining and improving the competence of Risk Management Certificate holders in the field of banking risk management. The maintenance program is implemented with reference to the following provisions:

1. Conducted periodically at least once every year after the Risk Management Certificate is issued; and
2. The forms of maintenance program activities include in-house training, seminars, dissemination of regulations from the competent authorities, workshops, e-learning, and/or work portfolios related to the Bank's risk management field.

As of December 31, 2025, the majority of BNI Board of Commissioners members have passed and hold valid Risk Management Certification with a qualification level of JK-6, as detailed below:

Name	Position	Qualification Level (JK)	Certificate Issuing Institution	Certificate Issue Date	Expiration Date	Validity Period
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	JK 6	Professional Certification Institution Risk Management Certification Agency (LSP BSMR)	April 21, 2025	April 21, 2028	3 years
Tedi Bharata	Vice President Commissioner	JK 6	Professional Certification Institution Banking Professional Certification Agency (LSP LSPP)	June 3, 2024	June 3, 2027	3 years
Vera Febyanthy	Independent Commissioner	JK 6	Professional Certification Institution Risk Management Certification Agency (LSP BSMR)	April 21, 2025	April 21, 2028	3 years
Didik Junaedi Rachbini	Independent Commissioner	JK 6	Professional Certification Body Risk Management Certification Agency (LSP BSMR)	April 21, 2025	April 21, 2028	3 years
Donny Hutabarat	Commissioner	JK 6	Professional Certification Body Risk Management Certification Agency (LSP BSMR)	April 21, 2025	April 21, 2028	3 years
Febrio Nathan Kacaribu	Commissioner	In the process of fulfilling certification				

*) Appointed as a member of the Board of Commissioners since December 15, 2025, but not yet effective as he is still undergoing the OJK Fit & Proper Test.

BASIS FOR IMPLEMENTING THE DUTIES OF THE BOARD OF COMMISSIONERS

The Board of Commissioners is required to prepare a Work Plan and Budget (RKA) every year as a reference in carrying out its duties, authorities, and responsibilities as a supervisory body. The RKA is prepared and submitted to the Board of Directors at the beginning of the fiscal year, and has been prepared in accordance with the following regulatory provisions:

1. Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated 3 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises Article 14 paragraph (8) stipulates that the Board of Commissioners/Supervisory Board is required to prepare an annual work plan and budget for the Board of Commissioners/ Supervisory Board which is an inseparable part of the Company's Work Plan and Budget (RKAP); and
2. BNI's Articles of Association stipulates that the Board of Commissioners is required to prepare a work program for the Board of Commissioners which is an inseparable part of the Company's Annual Work Plan and Budget prepared by the Board of Directors.

MECHANISM FOR IMPLEMENTING THE BOARD OF COMMISSIONERS' SUPERVISORY DUTIES

The procedures and mechanisms for performing the functions, duties, and obligations of the BNI Board of Commissioners are regulated as follows:

1. The Board of Commissioners holds Board of Commissioners meetings, including internal Board of Commissioners meetings, meetings with invited Sector Directors and Senior Executive Vice Presidents regarding the discussion agenda, or routine meetings with the Board of Directors;
2. The active role of the committees under the Board of Commissioners in assisting and supporting the smooth execution of the Board of Commissioners' duties includes conducting committee meetings, as well as carrying out evaluations, studies, or reviews of matters that are part of the Board of Commissioners' responsibilities;
3. Providing suggestions, advice or decisions of the Board of Commissioners in writing to the Board of Directors as:
   a. Follow-up to the results of the Board of Commissioners Meeting or the Board of Commissioners' meeting with the Board of Directors; and
   b. Responses to reports on the implementation of the Board of Directors' duties or requests for approval, consultation or proposals submitted by the Board of Directors to the Board of Commissioners, as well as information regarding strategic and significant problems based on the results of the Board of Commissioners' evaluation and review of written reports on the implementation of the Board of Directors' duties to the Board of Commissioners.
4. Implementation of working visits by the Board of Commissioners to BNI work unit environments and provision of advice and suggestions by the Board of Commissioners to the Board of Directors based on the results of the Board of Commissioners' working visits.

REPORT ON THE IMPLEMENTATION OF THE DUTIES OF THE BOARD OF COMMISSIONERS IN 2025

In 2025, the Board of Commissioners collectively performed its supervisory function over the Bank's policies and management in accordance with laws and regulations, the Articles of Association, and the Work Plan. To support the effectiveness of its supervision, the Board of Commissioners routinely held internal meetings, joint meetings with the Board of Directors, and conducted visits to divisions, regional offices, branches, and overseas offices, both offline and online. The implementation of the supervisory function carried out by the Board of Commissioners is explained in detail as follows:

1. **Supervision of the Bank's Business Plan (RBB)/ Corporate Work Plan and Budget (RKAP) and Financial Performance**
   The Board of Commissioners carried out comprehensive oversight of the Bank's Business Plan (RBB) and BNI's strategic policies, including directing, monitoring, and evaluating the implementation of the Corporate Plan, monthly financial performance, and the achievement of the Bank's financial targets. The Board of Commissioners also reviewed and evaluated the realization of the RBB reported to the Financial Services Authority (OJK) on a semi-annual basis. In addition, the Board of Commissioners routinely reviewed consolidated financial performance reports, financial information to be disclosed, as well as the implementation of audits conducted by Public Accounting Firms, including proposing the appointment of external auditors. Throughout 2025, the Board of Commissioners approved the Revision of the 2025 RBB/RKAP and the RBB/ RKAP for 2026.

2. **Internal Control, Risk Management, and Compliance**
   To ensure effective governance, the Board of Commissioners supervised the implementation of the internal control system, monitored the effectiveness of the Internal Audit Unit, and ensured follow-up on findings from internal and external audits, as well as examinations conducted by OJK, the Supreme Audit Agency (BPK), and other authorities. The Board of Commissioners also evaluated BNI's risk management policies and the implementation of integrated risk management, including the Bank's soundness level, risk profile, capital adequacy, and periodic risk mitigation strategies. Compliance oversight was exercised through evaluations of the implementation of the compliance function, reports from the Director of Compliance, and the implementation of the Anti-Bribery Management System (ABMS), Anti-Fraud Strategy, Whistleblowing System, as well as AML/CFT and Counter-Proliferation Financing programs.

3. **Technology, Human Resources, and Consumer Protection**
   The Board of Commissioners also supervised the implementation of the Information Technology Strategic Plan, IT development plans, and digital initiatives such as wondr by BNI, BNIdirect, and credit-related tools. In addition, oversight was conducted over human capital management,

remuneration policies for the Board of Directors, the Board of Commissioners, and employees, as well as the management of outsourcing arrangements. Evaluations were carried out on consumer protection, the provision of payment system services, the achievement of the Payment System Infrastructure Roadmap (RPIM), and the implementation of internal control over financial reporting (ICOFR).

4. **Strengthening GCG, Oversight of Subsidiaries, and Credit Quality**
   The Board of Commissioners ensured the implementation of Good Corporate Governance (GCG) principles at all levels of BNI and its subsidiaries within the Financial Conglomeration, including reviewing GCG implementation reports, self-assessments, evaluating the performance of subsidiaries, and encouraging continuous improvements in governance practices in accordance with prevailing regulations and best practices. The Board of Commissioners approved various strategic policies, including the Corporate Plan, RBB/RKAP, Sustainable Finance Action Plan (RAKB), Risk Appetite Statement (RAS), organizational changes, as well as integrated risk management and governance policies. The Board of Commissioners also monitored developments in credit portfolio quality and the realization of write-offs to ensure the consistent application of prudential principles.

5. **Supervisory Reports on the Implementation of the Bank's Business Plan Submitted to OJK and Responses to the Achievement of the Bank's Performance and KPIs Submitted to BP BUMN (formerly the Ministry of State-Owned Enterprises)**
   The Board of Commissioners submitted the Supervisory Report on the Implementation of the Bank's Business Plan to OJK on a semi-annual basis and delivered responses regarding the achievement of the Bank's performance and Key Performance Indicators (KPIs) to BP BUMN (formerly the Ministry of State-Owned Enterprises) on a quarterly basis.

LIST OF RECOMMENDATIONS / SUGGESTIONS / ADVICE FROM THE BOARD OF COMMISSIONERS IN 2025

Throughout 2025, the Board of Commissioners has issued several important Recommendations/Advice to the Board of Directors regarding the management and administration of the Bank, including:

1. **General Performance**
   a. Performance achievements should take into account the growth of the banking industry, especially in facing peer group challenges and future market trends. This is necessary for banks to maintain and improve their positioning in the banking industry. Therefore, the Board of Directors should continue to explore breakthroughs and innovations that can be implemented and have a positive impact on improving the Company's performance.
   b. The Board of Directors should continue to strive to improve internal business processes through the creation of appropriate policies, quality human resources, and adequate technology so as to produce quality performance.
   c. In implementing the Company's strategy, the Board of Directors is expected to continue to improve the implementation of adequate risk management and prepare possible scenarios, by conducting business prudently and guided by applicable laws and regulations, and implementing the principles of Good Corporate Governance (GCG).
   d. All government program financing initiatives must continue to be implemented in accordance with the principles of prudential banking, credit risk control, and compliance with OJK Regulations, Bank Indonesia Regulations, and other Government Regulations specifically governing government program financing.
   e. The Board of Directors is requested to take advantage of the momentum to strengthen BNI's position as a major global bank amid reciprocal tariff negotiations between Indonesia and the United States, including approaching Danantara regarding the centralization of settlement transactions for all state-owned enterprises with foreign partners.

2. **Credit**
   a. BNI is the only Indonesian bank with branches in several global financial centers; therefore, the Board of Commissioners requests the Board of Directors to closely examine opportunities related to Offshore NDF, which can also support BNI's custodian business and reach international investors, with the hope that BNI can act as a channeling agent to attract domestic inflows.
   b. Given the increasingly uncertain economic conditions, additional efforts are required to intensely monitor the condition/business progress of debtors whose loans have been restructured so they can return to performing status. It is advised that CKPN (Allowance for Impairment Losses) be formed gradually in accordance with regulations for loans that have been restructured under relaxation programs but show no signs of improvement.

c. The Board of Commissioners reminds the Board of Directors of the importance of conducting the credit granting process prudently by strictly implementing the 5C Principles and the four-eyes principle in every process. These principles include evaluating Know Your Customer (KYC), business conditions directly related to repayment capacity as the first way-out, ensuring the collateral adequacy ratio as the second way-out, meeting the minimum requirements according to the Bank's Credit Policy (KPB), monitoring the use of credit facilities, and tracking debtor business growth.
d. In order to increase BNI's competitiveness against its main competitors regarding SLA, the Board of Commissioners requests the Board of Directors to establish end-to-end SLA standards for all credit segments, starting from the credit application process, verification, and analysis, through to credit disbursement, while still maintaining precautionary aspects and risk management.
e. In connection with the implementation of the end-to-end credit process improvement program, a comprehensive evaluation should be conducted to determine the effectiveness of the program. Additionally, improvements must be made to achieve the program's objectives. The Board of Commissioners reminds the Board of Directors that credit process improvements should pay attention to internal and external audit findings.
f. The Board of Directors is also urged to enhance supervision protocols and risk mitigation implemented appropriately, as well as to diversify with loans in other segments, particularly consumer, small, and commercial. This is an anticipation that should a macro-economic downturn occur, loans from the corporate segment do not become a source of risk for BNI bank-wide.
g. Regarding existing credit analysts, in terms of both competency/knowledge and character, the Board of Commissioners advises that a thorough evaluation be conducted, including an adequate assessment process, as well as an evaluation of the history of credits they have recommended, covering their credit portfolio performance, specifically the percentage of performing and non-performing loans.
h. The Board of Commissioners encourages the integration of risk management implementation with technological support, including the utilization of Artificial Intelligence (AI) and behavior assessment, to respond to the declining risk profile in the medium segment and to identify financing tenors and the relocation of liquid assets that can be optimized, which is expected to reduce NPL and LaR.
i. The Board of Commissioners urges the Board of Directors to pay attention to the increase in the cost of funds, and such increase must be balanced with efficiency in the opex cost components, considering the future challenges in obtaining liquidity.

3. Liquidity

a. The Board of Commissioners regards it necessary to have further engagement with corporate and institutional customers with the expectation of acquiring the ecosystem of these customers, so that the Retail, Consumer, and Commercial segments can benefit in the form of both funding and financing.
b. Regarding the allocation of the Excess Budget Balance (SAL) from the Government of Indonesia through the Ministry of Finance to BNI, the Board of Commissioners requests the Board of Directors to conduct periodic stress tests and implement risk mitigation steps in the event of a total withdrawal of SAL funds, which poses a risk to BNI's LDR surge.
c. The Board of Commissioners advises the Board of Directors to encourage credit growth more aggressively yet remains controlled, by utilizing the still-large national liquidity space, including optimizing the momentum of stricter Export Proceeds (DHE) policies.
d. Regarding the carbon footprint issue, the Board of Commissioners suggests that the Board of Directors utilize the issue as an entry point for developing green products and services capable of creating new transactions, increasing income, and strengthening the bank's position in the green economy ecosystem.

4. Digital Banking and Technology.

a. The Board of Directors should optimize the utilization of information technology to enhance banking services and transactions for BNI and its subsidiaries, thereby providing a positive impact on the business performance of BNI and its subsidiaries through thorough preparation of reliable and adequate IT infrastructure (including data centers) capable of adapting to business growth and changing market needs.
b. The Board of Commissioners supports the strengthening of Artificial Intelligence (AI) and Big Data utilization across all of BNI's business processes as part of strengthening

digital business competencies, with a focus on increasing transparency, productivity, and efficiency. Such development should be implemented in alignment with areas of improvement in human capital aspects and is expected to support the provision of fast and accurate data analytics, particularly regarding market developments, while simultaneously strengthening the generating idea process to support the accuracy and speed of the Company's business strategy execution.

c. In the framework of information technology development at subsidiaries, it is expected to be fully integrated. In connection with this, the Board of Directors is requested to comprehensively review its strategic planning, including but not limited to the adequacy of resources, specifically human capital covering skill sets, capacity, and capabilities, as well as considering development options conducted directly by BNI based on a cost-and-benefit analysis.
d. Regarding the IT infrastructure improvements that have commenced for the wondr by BNI and BNI Direct applications, the Board of Commissioners requests the Board of Directors to conduct an evaluation and measure the success rate of both applications against business growth, including the increase in low-cost funds (CASA) and fee-based income, so that they may ultimately increase profit.
e. The Board of Directors is expected to continuously increase engagement for the wondr by BNI application in order to increase the number of active customers/merchants more aggressively yet remains controlled, which can strengthen CASA-based deposits.
f. In the future, the Board of Directors should develop features to analyze customer behavior, including classifications for customers with red-flag transactions.
g. In terms of maintaining the Bank's system security to support safe customer transactions and business, the Board of Commissioners emphasizes the need to formulate proactive steps in strengthening cybersecurity to prevent potential ransomware threats, protect data and critical infrastructure from cyberattacks, and focus on maintaining the integrity of the bank's systems.

5. Human Capital Policies and Procedures

a. A company's competitive advantage is influenced not only by technology and infrastructure but also significantly by Human Capital; therefore, the Board of Commissioners requests the Board of Directors to ensure that Human Capital at BNI is prepared by considering three aspects, namely: knowledge, skill set, and capabilities.
b. The Board of Directors is expected to ensure the integration of all employee data (including Medical Check-Up and psychological test results) into a single integrated system.
c. The Board of Commissioners requests the Board of Directors to pay attention to employee well-being, including the improvement of employee facilities both at the head office and in the regions.
d. In terms of developing an adaptive work environment, particularly for Gen Z, the Board of Commissioners encourages accelerating its development by considering 4 (four) main aspects: the provision of work hubs, transformation of work culture, flexible benefits, and digital learning (flexible e-learning).
e. In order to support skill development for BNI's Human Capital, the Board of Commissioners encourages BNI University to act as an enabler for development and learning that can drive the acceleration of BNI's business.

6. Bank Intermediation

a. Management's strategic steps that have successfully increased profit deserve appreciation and should be continued by prioritizing a fund-raising strategy that focuses on low-cost funds with efficient sources of funds. This can strengthen profitability with minimal funding costs, thereby creating a strong and sustainable foundation for growth while remaining mindful of the prudential principle in order to increase quality credit.
b. The Board of Directors should maintain a healthy balance between profit and risk in the Bank's intermediation activities and continuously improve corporate governance and strengthen internal controls to manage risks more effectively.

7. Implementation of Anti-Fraud Strategy

a. The Board of Directors is expected to develop a Fraud Detection System (FDS) that integrates people, process, and technology, so that early detection of potential fraud can be further optimized.
b. The Board of Commissioners views it necessary to impose strict sanctions, both on fraud perpetrators and on parties involved in the case as well as those who commit violations of regulations that create opportunities for fraud. This aims to provide a

deterrent effect that can reduce the chances of fraud occurring.

c. The implementation of the fraud framework based on four pillars (prevention, investigation, detection, and evaluation) should be strengthened with a primary focus on strengthening the detection pillar through systems, processes, and behavior monitoring.
d. KnowYour Employee (KYE) conducted by Unit Heads with HC support needs to be carried out for all employees as a means of detecting fraud through changes in employee behavior.
e. The Board of Commissioners directs the Board of Directors to formulate the company's risk architecture as a guideline for all divisions in implementing risk management and anti-fraud strategies in daily business processes (holistic risk view).
f. Operational risk management, fraud control, and the enhancement of internal control functions need to be improved and receive special attention from the Board of Directors, especially regarding incidents that impact BNI's achievements and stakeholder trust.

8. **Overseas Branches (KLN)**
   a. The Board of Directors should conduct comprehensive supervision across various aspects, including Risk Management, Compliance Function, Internal Control, Audit, and Anti-Fraud, towards Overseas Branches so that corrective efforts can be properly implemented to support sustainable business development and ensure that Overseas Branches operate in accordance with established standards and minimize risks associated with international activities.
   b. The Board of Commissioners encourages the Board of Directors to continuously improve and develop BNI's business and international network to ensure that the mandate from the Ministry of SOEs to BNI as a Global Bank is successfully executed.
   c. The Board of Commissioners encourages the Board of Directors to optimize the role of Overseas Branches in attracting investors to the country, as this presents business potential for BNI.
   d. The Board of Commissioners suggests the Board of Directors to examine opportunities related to offshore NDF, which can support BNI's custodian business and reach international investors. The expectation is that BNI can act as a channeling agent to attract domestic inflows.

9. **Integrated Governance and Risk Management**
   a. The Board of Commissioners provides input to the Board of Directors to ensure that BNI Group products are packaged and created comprehensively so that customers have various holistic options; it is expected that an integrated approach to the BNI Group ecosystem and value chain can serve as an effort toward customer retention.
   b. The Board of Commissioners emphasizes the importance of maintaining quality and consistency in the implementation of Integrated Governance (TKT) and Integrated Risk Management. Improvements in internal control and governance are critical steps that support the healthy and sustainable business growth and performance of Subsidiaries.
   c. The Board of Directors is encouraged to be more comprehensive in formulating Risk Profiles across all Subsidiaries by paying attention to operational risks that do not yet reflect a crisis mode. The operational risk framework is expected to serve as a guide in ensuring that the Three Lines Model functions effectively, internal processes run well, and to drive improvements in Compliance and Risk Management (KPMR) throughout all Subsidiaries.
   d. The Board of Directors should create a roadmap related to development according to the business priorities of each Subsidiary, including recovery and improvement efforts particularly regarding credit risk, liquidity risk, strategic risk, and performance decline, increasing provisions, decreasing financing quality, and fraud in subsidiaries that are still recording losses.

10. **Implementation of Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Financing of the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM)**
    a. The implementation of APU PPT and PPPSPM, which has been carried out well, should be continuously evaluated and updated in line with the latest policies and trends. Furthermore, the policies or guidelines that have been formulated must be socialized to all employees.
    b. The Board of Commissioners emphasizes the importance of increasing the knowledge and precision of Branch officers in inputting customer data according to the standards set in the account opening system to prevent inaccurate data. Additionally, the Board

of Commissioners also urges the Board of Directors to set strict target times for completing data updates as a step to improve overall efficiency and accuracy of customer data.

c. The Board of Directors is expected to ensure that all branch offices and business units directly dealing with customers consistently apply Enhanced Due Diligence (EDD) for customers categorized as "High Risk," including Politically Exposed Persons (PEP) and parties related to PEP, and perform screening of Walk-in Customers (WIC) through the provided platforms.
d. The Board of Commissioners reminds the importance of systems that support the analysis of Suspicious Financial Transaction Reports (LTKM) being equipped with LTKM scenarios and containing all points that must be executed. This aims to ensure that all data included in LTKM can be properly identified by the system.
e. Regarding Subsidiaries, the Board of Commissioners reminds them to ensure the timely and optimal fulfillment and updating of APU PPT and PPPSPM data, particularly for Subsidiaries whose achievements are still inadequate.

11. Subsidiaries

a. The Board of Directors is expected to routinely evaluate the work programs of each Subsidiary, oversee the transformation process, and continuously carry out improvement efforts so that Subsidiaries can provide a larger contribution to the Bank's overall performance through consolidation.
b. IT support for Subsidiaries is expected to lower the risk levels in each Subsidiary. Utilizing a technological approach, especially in supporting the Subsidiaries' businesses, can also act as a booster in improving performance.
c. The implementation of AI and Agentic AI can support BNI in terms of financial, risk areas, and business automation; therefore, the availability of human resources in the AI Roadmap must be ensured through synergy and communication with BNI Modal Ventura, which has networks and business relationships with IT startups.
d. The Board of Commissioners pays attention to the vacancies of strategic leadership positions in several Subsidiaries. Accelerating the filling of these vacant positions is necessary as this potentially poses a risk to the Subsidiaries.
e. The Board of Commissioners expects that the implementation of the 2025 Integrated Risk Appetite Statement (RAS) across all Subsidiaries be ensured and monitored periodically, including the implementation of early warning systems, particularly regarding fraud using an IT approach, as well as the implementation of periodic audits.
f. The Zero Fraud Tolerance commitment should be a value agreed upon by the entire Bank Financial Conglomerate, from the Main Entity (i.e., PIKK) to the Subsidiaries, in order to create a work environment with integrity and send a clear message that fraudulent acts will not be tolerated within the entire corporate organizational structure.
g. The Board of Commissioners urges that improvements and performance enhancements of Subsidiaries be carried out by reviewing scoring models, human resources, KPI operationalization, the ecosystem with the parent Company, and the synergy between BNI and its Subsidiaries.

BOARD OF DIRECTORS DECISIONS REQUIRING APPROVAL FROM THE BOARD OF COMMISSIONERS [ACGS D.1.2]

The Board of Directors may issue Board of Directors Decrees to regulate specific matters related to the operational and business management of the Bank. However, there are exceptions for certain matters where the Board of Directors must obtain prior approval from the Board of Commissioners before issuing such decrees, as stipulated in the Board of Commissioners Decree within specific limits and/or criteria that have been approved by the Series A Dwiwarna Shareholder. Referring to the Bank's Articles of Association and the Board of Commissioners Decree, while observing applicable laws and regulations in the Capital Market and Banking sectors, the scope of the Board of Directors' decisions that require written approval from the Board of Commissioners is as follows:

1. Write off the Company's assets within a certain value limit determined by the Board of Commissioners with due consideration of regulatory provisions on State-Owned Enterprises, as follows:
   a. Write off due to the transfer/assignment of the Company's Fixed Assets;
   b. Write off due to the transfer/assignment of other Company Assets;
   c. Write off the Company's Fixed Assets and/or other Assets other than due to transfer/assignment;

except for the Company's assets held for the purpose of carrying out the Company's business activities in accordance with applicable laws and regulations, including assets in the form of credit, securities, foreclosed collateral, movable property, and other assets acquired in the course of the Company's business activities with due consideration of regulatory provisions in the capital market and banking sectors;
2. Pledge the Company's assets as collateral with certain value limits determined by the Board of Commissioners, except for the Company's assets in the context of carrying out the Company's business activities in accordance with applicable laws and regulations, which include assets in the form of credit, securities, foreclosed collateral, movable goods, and other assets obtained in the context of the Company's business activities, with due regard to provisions in the capital market and banking sectors;
3. Entering into partnerships with business entities or other parties in the form of licensing agreements, management contracts, asset leases, Joint Operations (KSO), Build Operate Transfer (BOT), Build Own Transfer (BOWT), Build Transfer Operate (BTO), and other similar partnerships that are not part of the Company's day-to-day business as usual activities, with a specific value or time period determined by the Board of Commissioners;
4. Making equity participation in subsidiaries, joint ventures, and/or other companies, including participation to establish subsidiaries and/or joint ventures with certain value limits determined by the Board of Commissioners, except for the purpose of rescuing receivables, taking into account provisions in the Capital Market and Banking sectors;
5. Reducing equity participation, including dilution, in subsidiaries, joint ventures, and/or other companies with certain value limits determined by the Board of Commissioners, except for the purpose of rescuing receivables, taking into account provisions in the Capital Market and Banking sectors;
6. Releasing Equity participation in subsidiaries, joint ventures, and/or other companies with a certain value limit determined by the Board of Commissioners, except for the purpose of rescuing receivables, taking into account provisions in the Capital Market and Banking sectors;
7. Merging, consolidating, acquiring, separating, and dissolving subsidiaries and joint ventures with a certain value determined by the Board of Commissioners, taking into account provisions in the Capital Market and Banking sectors;
8. Taking actions that constitute material transactions as stipulated by laws and regulations in the Capital Market sector with a certain value determined by the Board of Commissioners, unless such actions constitute material transactions exempted by laws and regulations in the Capital Market sector;
9. Establishing and changing the Company's logo;
10. Establishing the organizational structure one level below the Board of Directors;
11. Taking actions not covered in the Company's Work Plan and Budget (RKAP).

Relinquishing the right to collect or not collect principal bad debts that have been written off for credit settlement, either in part or in full, which is implemented based on policies established by the Board of Directors with the approval of the Board of Directors. The Board of Commissioners and within the amount of the write-off ceiling (limit) that has been determined by the GMS, which will remain in effect until a new ceiling (limit) is determined by the GMS, provided that prior approval is obtained from BPI Danantara in accordance with laws and regulations in the BUMN sector is obtained.

The Board of Commissioners' approval regarding points 1, 2, 3, 4, 5, 6, 7 and 8 above with certain limitations and/or criteria, is determined after obtaining the approval of the Series A Dwiwarna Shareholder or the Holder of the Most Series B and Series C Shares. The determination of limitations and/or criteria by the Board of Commissioners for matters referred to in points 1, 2, 3, 4, 5, 6, 7 and 8 above is carried out after obtaining the approval of the Holder of the Most Series B and Series C Shares. The Board of Commissioners' approval regarding point 11 above is determined after obtaining the approval of the Holder of the Most Series B and Series C Shares. The Board of Directors' actions as referred to in point 3 above, as long as they are necessary for the implementation of business activities commonly carried out in the banking business sector with due regard to the provisions of laws and regulations, do not require the approval of the Board of Commissioners and/or the GMS.

IMPLEMENTATION OF BOARD OF COMMISSIONERS' DECISIONS IN 2025

The Board of Commissioners has the authority to issue Board of Commissioners Decrees related to strategic matters to assist and support the execution of its duties and responsibilities as the supervisory organ of the Board of Directors, as well as to enforce the application of good governance principles in the Bank. Below is a list of the Board of Commissioners' Decrees that have been implemented during 2025, including:

1. Appointment of Mr. Alwi Abdurrahman Shihab as a Member of the Integrated Governance Committee

2. Termination of the Appointment of Ms. Demy Marizka Inriani and the Appointment of Mr. Ryan Alief Putra as Secretariat Staff of the Board of Commissioners
3. Termination of the Appointment of Mr. Anas Puji Istanto as Secretary of the Board of Commissioners
4. Termination of the Appointment of Mr. Anas Puji Istanto as Secretary of the Nomination and Remuneration Committee
5. Appointment of Mr. Sarpi as Secretary of the Board of Commissioners
6. Appointment of Mr. Sarpi as Secretary of the Nomination and Remuneration Committee
7. Appointment of a Member of the Board of Commissioners as a Member of the Nomination and Remuneration Committee
8. Appointment of a Member of the Board of Commissioners as a Member of the Integrated Governance Committee
9. Appointment of a Member of the Board of Commissioners as a Member of the Risk Monitoring Committee
10. Appointment of a Member of the Board of Commissioners as a Member of the Audit Committee
11. Honorable Termination of Ms. Nurani Raswindriati as an Independent Member of the Integrated Governance Committee
12. Honorable Termination of Mr. Sarpi as Secretary of the Board of Commissioners
13. Honorable Termination of Mr. Sarpi as Secretary of the Nomination and Remuneration Committee
14. Appointment of Mr. Muhammad Yusuf as Secretary of the Board of Commissioners
15. Appointment of Mr. Muhammad Yusuf as Secretary of the Nomination and Remuneration Committee
16. Honorable Termination of Ms. Tri Kartika Dewi and the Appointment of Mr. Muhammad Daffa Nasution as Secretariat Staff of the Board of Commissioners
17. Charter of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk
18. Rules of Procedure for Meetings of the Board of Commissioners and Joint Meetings of the Board of Commissioners with the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk
19. Allowances, Facilities, and Benefits for Members of the Board of Directors and Board of Commissioners
20. Honorable Termination of Mr. Bambang Setyogroho as an Independent Member of the Risk Monitoring Committee
21. Honorable Termination of Mr. Human Brilianto as an Independent Member of the Audit Committee
22. Charter of the Integrated Governance Committee
23. Charter of the Risk Monitoring Committee
24. Charter of the Nomination and Remuneration Committee
25. Charter of the Audit Committee and Code of Ethics of the Audit Committee
26. Appointment of Ms. Retno Murwani as an Independent Member of the Risk Monitoring Committee
27. Appointment of Mr. Donny Hutabarat as a Member of the Nomination and Remuneration Committee
28. Appointment of Mr. Donny Hutabarat as a Member of the Risk Monitoring Committee
29. Appointment of Mr. Donny Hutabarat as a Member of the Integrated Governance Committee
30. Confirmation of the Termination of Appointment of Mr. Suminto as a Member of the Nomination and Remuneration Committee
31. Confirmation of the Termination of Appointment of Mr. Suminto as a Member of the Risk Monitoring Committee
32. Confirmation of the Termination of Appointment of Mr. Suminto as a Member of the Integrated Governance Committee
33. Honorable Termination of Mr. Suhendi Muharam as an Independent Member of the Audit Committee
34. Appointment of Mr. Alih Suasono as an Independent Member of the Audit Committee
35. Appointment of Mr. Alih Suasono as an Independent Member of the Integrated Governance Committee
36. Appointment of Mr. Jhon F. Tamba as an Independent Member of the Audit Committee
37. Appointment of Mr. Jhon F. Tamba as an Independent Member of the Integrated Governance Committee
38. Honorable Termination of Ms. Dwita Suherlina as an Independent Member of the Risk Monitoring Committee

BOARD OF COMMISSIONERS' ASSESSMENT OF THE PERFORMANCE OF COMMITTEES UNDER THE BOARD OF COMMISSIONERS [ACGS D.5.7]

In order to enhance the role of the Board of Commissioners in carrying out its supervisory and advisory functions to the Board of Directors, the Board of Commissioners has formed 4 (four) supporting committees under it, namely:
1. Audit Committee;
2. Risk Monitoring Committee;
3. Nomination and Remuneration Committee; and
4. Integrated Governance Committee.

The four committees above execute clear mandates in accordance with prevailing laws and regulations as well as their respective work guidelines, thereby providing objective and independent input and recommendations to the Board of Commissioners. At least once a year, the Board of Commissioners conducts a performance evaluation of the committees under its authority to ensure that the execution of functions, duties, and responsibilities is running optimally. The evaluation is conducted by taking into account key performance indicators,

including the achievement of work plans/programs, the attendance and participation rates of members in meetings, as well as the submission of reports on the implementation of duties and activities by the Audit Committee, the Nomination and Remuneration Committee, the Risk Monitoring Committee, and the Integrated Governance Committee.

Assessment Procedures and Criteria Used

[ACGS D.5.7]

The Board of Commissioners conducts an evaluation of the performance of the committees under its authority to ensure that the execution of functions, duties, and responsibilities is carried out effectively. The performance assessment is conducted based on a number of criteria, which at a minimum include:

a. The realization of the committee's work plan/ program achievements during the fiscal year;
b. The attendance and participation rates of members in meetings;
c. Member competencies; and
d. The submission of reports on the implementation of duties.

Party Conducting Performance Assessment of Committees of the Board of Commissioners [ACGS D.5.7]

The Board of Commissioners periodically assesses the performance of committees under the Board of Commissioners, including the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. At least once a year, the Board of Commissioners provides a performance assessment of the committees at the Board of Commissioners level to ensure the implementation of activities carried out by the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee.

In addition, the performance assessment of all committees under the Board of Commissioners also involves an independent external party at least once every 3 (three) years.

Result of Committee Performance Assessment in 2025

In 2025, the Board of Commissioners conducted a performance assessment of the committees under its authority based on established indicators or criteria. The results of the assessment show that each committee member actively participated in internal meetings as well as joint meetings with the Board of Commissioners, as reflected in the high level of attendance. Furthermore, the assessment was also based on the reports on the implementation of duties submitted periodically and in writing to the Board of Commissioners. In supporting the execution of the supervisory function, each committee played a part in providing recommendations that served as considerations and complemented the Board of Commissioners' perspective in carrying out its duties and responsibilities.

The following are the results of the Board of Commissioners' assessment of the performance of the supporting committees throughout 2025:

- Audit Committee
  The Audit Committee has carried out its oversight duties and responsibilities related to the review of financial information issued by the Bank to the public and/or to the Authorities. In addition, the Audit Committee also conducted reviews to ensure compliance with laws and regulations relevant to the Bank's activities, provided recommendations to the Board of Commissioners regarding the appointment of Public Accountants (AP) and Public Accounting Firms (KAP), and evaluated the effectiveness of the implementation of audits/services provided by Public Accountants (AP) and Public Accounting Firms (KAP). The Audit Committee also reviewed the annual internal audit plan, monitored the execution and results of audits by BNI's Internal Audit (IAD) and external audits, and oversaw the completion of follow-up actions by Management.

- Risk Monitoring Committee
  The Risk Monitoring Committee has assessed the suitability between risk management policies and the implementation of Bank policies, and also monitors and evaluates the implementation of tasks by the risk management committee and risk management work unit. The results of this assessment are used to provide recommendations to the Board of Commissioners. The Risk Monitoring Committee evaluates the implementation of risk management for the Bank's 8 (eight) main risks, namely Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Strategic Risk, Legal Risk, Compliance Risk, Reputation Risk, and an additional 2 (two) other risks included in integrated risk management, namely Insurance Risk and Intragroup Transaction Risk.

- Nomination and Remuneration Committee
  The Nomination and Remuneration Committee has also carried out its role in carrying out supervisory duties and obligations, which include evaluating and formulating recommendations to the Board of Commissioners regarding regulations and policies related to nomination and remuneration for members of the Board of Commissioners, Board of Directors, executive officers and employees as a whole. This also includes examining and assessing the company's

talent management policies, as well as evaluating organizational development proposed by the Board of Directors in accordance with applicable regulations.

- Integrated Governance Committee
  The Board of Commissioners assesses that the Integrated Governance Committee has carried out its oversight function optimally throughout 2025, as evidenced by the implementation of comprehensive evaluations regarding the effectiveness of internal controls, the integration of the compliance function, and the performance of the Integrated Governance Guidelines. During this period, the Committee played an active role in providing strategic recommendations to the Board of Commissioners of the Main Entity (i.e., PIKK), which included proposals for guideline refinements as well as in-depth assessments of the suitability between policies and their implementation in the field. This proactive step was taken to ensure that governance standards are applied consistently, effectively, and accountably across all Financial Services Institutions within the BNI Financial Conglomeration ecosystem.

  Throughout 2025, the execution of programs and work plans by the committees under the Board of Commissioners was demonstrated by the level of participation, the number of meetings attended, and the reports detailing the activities carried out by the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. This indicates that these committees have effectively fulfilled their duties and responsibilities.

COMPLETENESS OF THE BOARD OF COMMISSIONERS' ORGAN

To support the effective execution of the Board of Commissioners' duties and responsibilities, particularly in overseeing the management of the Bank by the Board of Directors, BNI establishes supporting organs under the Board of Commissioners, which consist of committees under the Board of Commissioners and the Board of Commissioners Secretariat. The establishment and implementation of the Secretariat of the Board of Commissioners and the supporting committees under the Board of Commissioners have taken into account the provisions of applicable laws and regulations, including:

1. Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated March 3, 2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises and Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 dated March 20, 2023, concerning Organs and Human Resources of State-Owned Enterprises, the organs of the Board of Commissioners may consist of the Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee, as well as the Secretariat of the Board of Commissioners;
2. Regulation of the Financial Services Authority No. 18/POJK.03/2014, dated November 18, 2014, concerning the Implementation of Integrated Governance for Financial Conglomerates, in order to support the effectiveness of the implementation of its duties, the Board of Commissioners of the Main Entity is required to form an Integrated Governance Committee;
3. Financial Services Authority Regulation No. 45/POJK.03/2015, dated December 23, 2015, concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks, in carrying out the task of supervising the implementation of the Remuneration policy and periodically evaluating the Remuneration policy, the Board of Commissioners is required to form a Remuneration Committee;
4. Financial Services Authority Regulation No. 55/POJK.04/2015, dated December 23, 2015, concerning the Establishment and Guidelines for the Implementation of the Audit Committee, Issuers or Public Companies are required to have an Audit Committee and
5. Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, concerning the Implementation of Governance for Commercial Banks, in order to support the effectiveness of the implementation of duties and responsibilities, the Board of Commissioners is required to form at least an Audit Committee, a Risk Monitoring Committee, and a Nomination and Remuneration Committee.

Working Mechanism of Committees Under the Board of Commissioners

The implementation of the duties of the committees under the Board of Commissioners must be guided by the respective Committee Charters as established through the Board of Commissioners Decree and published on the Bank's official website, namely:

1. Decree of the Board of Commissioners No. KEP/022/DK/2024 dated September 19, 2025, concerning the "Integrated Governance Committee Charter";
2. Decree of the Board of Commissioners No. KEP/023/DK/2024 dated September 19, 2025, concerning the "Risk Monitoring Committee Charter";
3. Decree of the Board of Commissioners No. KEP/024/DK/2024 dated September 19, 2025, concerning the "Nomination and Remuneration Committee Charter"; and

4. Decree of the Board of Commissioners No. KEP/025/DK/2025 dated September 19, 2025, concerning the "Audit Committee Charter and Code of Ethics of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk."

At the beginning of each year, all committees under the Board of Commissioners prepare their respective Work Plan Programs to be used as guidelines in executing their duties to support the implementation of the Board of Commissioners' duties, whether through monitoring activities, reviews, or providing advice or recommendations to the Board of Commissioners regarding matters related to the functions and duties of the respective committees through the following mechanisms:

1. The Committee holds meetings both internally and by inviting the relevant Director, unit and/or division and/or related unit;
2. The Committee conducts a review/evaluation/review and discussion/discussion outside the meeting forum, which, if necessary, is conducted with related units or divisions/units;
3. The results of the meeting or evaluation/review and discussion/discussion outside the meeting forum are submitted by the Committee Chair to the Board of Commissioners as a report either in writing or in the Board of Commissioners Meeting forum discussing the related agenda; and
4. The Committees under the Board of Commissioners submit a report on the realization of their work programs/activities every quarter to the Board of Commissioners.

Further information related to each Committee is presented separately in a separate sub-chapter, Committees Under the Board of Commissioners.

Performance Assessment of Committees Under the Board of Commissioners

Information related to the performance assessment of the committees under the Board of Commissioners has been presented separately in a separate subchapter, Committees Under the Board of Commissioners.

Performance Assessment or Evaluation of Independent Committee Members

The committee chair conducts performance evaluations of independent committee members annually or as needed at any time. The performance evaluation includes Performance Assessment Indicators that cover but are not limited to, the competence and expertise, quality of output, discipline, and attendance of the respective committee members at the Bank, as well as the execution of duties and responsibilities in accordance with the committee charter and work procedures applicable to independent committee members under the Board of Commissioners. Furthermore, the results of the evaluation and assessment, as referred to, are submitted as recommendations to the Board of Commissioners to extend or terminate the appointment of the committee members concerned at the Bank. The assessment factors used as the basis for assessing the performance of committee members under the Board of Commissioners who come from independent parties (not the Board of Commissioners), are as follows:

1. Duties according to the Committee Charter (weight 25%);
2. Competence and Skill (weight 30%);
3. Output Quality (weight 30%); and
4. Attendance Level (15%).

Obligation of Attendance of Committee Members Coming from Independent Parties

Independent committee members from outside the Bank are required to be present regularly during the Bank's working days and hours, in accordance with the schedule determined by the Board of Commissioners and/or the committee chairperson. This includes attending Committee Meetings and performing other assigned duties. Additionally, they are required to sign the attendance register at the Bank when carrying out tasks beyond attending Committee Meetings. If necessary, at the request of the Board of Commissioners and/or the committee chairperson, independent committee members must also be present at the Bank, during Board of Commissioners Meetings or Committee Meetings, or at specific activities that require the presence of the Board of Commissioners. This requirement applies outside the previously established frequency and schedule of routine attendance. Information regarding the committees under the Board of Commissioners and the Secretary of the Board of Commissioners is provided in a separate subchapter.

Board of Commissioners Secretariat Organ

The BNI Board of Commissioners Secretariat is headed by the Secretary of the Board of Commissioners, an external appointee, supported by the staff of the Board of Commissioners Secretariat. The functions and duties of the Board of Commissioners Secretariat and the Secretary of the Board of Commissioners are carried out in accordance with the Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023, dated March 20, 2023, concerning the Organs and Human

Resources of State-Owned Enterprises. Information regarding the Secretariat of the Board of Commissioners and the Secretary of the Board of Commissioners is presented in a separate subchapter, Supporting Organs of the Board of Commissioners.

Independent Commissioner

Independent Commissioners are members of the Board of Commissioners who have no financial, management, share ownership, and or family relationships with members of the Board of Directors, other members of the Board of Commissioners, and or controlling shareholders, including the ultimate controlling shareholder, nor any relationship with the Bank that could give rise to potential conflicts of interest that may impair their independence in decision making. The role of Independent Commissioners is to promote a more objective working climate and environment, while upholding fairness and equality among various interests, including the interests of minority shareholders and other Stakeholders. This role also strengthens the integrity of corporate governance through oversight of management and the strategic decision making process at BNI. The presence of Independent Commissioners at BNI represents the Bank's compliance with the provisions of OJK Regulation No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks and OJK Circular Letter No. 14/SEOJK.03/2025 on the Implementation of Corporate Governance for Commercial Banks.

CRITERIA AND NUMBER OF INDEPENDENT COMMISSIONERS

As of December 31, 2025, BNI had 3 (three) Independent Commissioners, representing 50% of the total 6 (six) members of the Board of Commissioners. Accordingly, the number of Independent Commissioners at BNI has met the requirements stipulated under OJK Regulation No. 17 of 2023 and OJK Circular Letter No. 14/SEOJK.03/2025 on the Implementation of Corporate Governance for Commercial Banks, as well as international governance standards under the ASEAN Corporate Governance Scorecard, which require at least 50 percent of the total members of the Board of Commissioners.[ACGS (B).D.4.1, D.2.4]

The following are the Independent Commissioners serving as of the end of the 2025 financial year:

Name	Position	Legal Basis of Appointment	Term of Office
Omar Sjawaldy Anwar	President Commissioner/Independent Commissioner [ACGS D.4.2]	AGMS March 26, 2025	2025-2030
Vera Febyanthy	Independent Commissioner	AGMS March 26, 2025	2025-2030
Didik Junaedi Rachbini	Independent Commissioner	AGMS March 26, 2025	2025-2030

The Bank always pays attention to the individual criteria that Independent Commissioners must fulfill, especially regarding the requirements and criteria for Independent Commissioners as further regulated through other applicable laws and regulations, in particular:

1. Law No. 40 of 2007 concerning Limited Liability Companies as amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulations in Lieu of Law Number 2 of 2022 concerning Job Creation into Law, which regulates that:
   a. The Company's Articles of Association may regulate the existence of 1 (one) or more independent commissioners and 1 (one) delegate commissioner; and
   b. Independent commissioners are appointed based on GMS resolutions from parties who are not affiliated with the major shareholders, members of the Board of Directors, and/or other members of the Board of Commissioners.
2. Financial Services Authority Regulation No. 33/POJK.04/2014 dated December 8, 2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Independent Commissioner of Public Companies, which regulates that:
   a. Independent Commissioners are members of the Board of Commissioners who come from outside the Issuer or Public Company and fulfill the requirements as Independent Commissioners as referred to in the POJK;
   b. Independent Commissioners must fulfill the following requirements:
      i. Not a person who works or has the authority and responsibility to plan, lead, control or supervise the activities of an Issuer or Public Company within the last 6 (six) months, except for reappointment as an Independent Commissioner of an Issuer or Public Company in the following period;

ii. Does not own shares, either directly or indirectly, in the Issuer or Public Company;
iii. Does not have affiliation with the Issuer or Public Company, member of the Board of Commissioners, member of the Board of Directors, or major shareholder of the Issuer or Public Company; and

c. Does not have any direct or indirect business relationships related to the business activities of the Issuer or Public Company.

3. Financial Services Authority Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, which regulates that:
   a. Candidates for Independent Commissioners must have:
      i. Knowledge in the banking sector that is adequate and relevant to the position as Independent Commissioner; and
      ii. Experience in banking and/or finance.
   b. Former members of the Board of Directors or Executive Officers of the Bank or parties who have a relationship with the Bank who may influence the person's ability to act independently must undergo a cooling-off period of at least 1 year before becoming an Independent Commissioner at the Bank concerned.
   c. Non-Independent Commissioners can change to become Independent Commissioners at the Bank or bank business group concerned by fulfilling the requirements as an Independent Commissioner.
   d. Non-Independent Commissioners who will transition to become Independent Commissioners at the Bank concerned are required to undergo a cooling-off period of at least 1 (one) year.
   e. The transition from Non-Independent Commissioner to Independent Commissioner must obtain OJK approval through a fit and proper test in accordance with POJK regarding fit and proper tests for financial services institutions.
4. Financial Services Authority Circular No. 14/SEOJK.03/2025 concerning the Implementation of Governance for Commercial Banks, which regulates that:
   a. An Independent Commissioner is a member of the Board of Commissioners who has no financial, management, ownership, and or family relationships with other members of the Board of Commissioners, members of the Board of Directors, and or controlling shareholders, including the ultimate controlling shareholder, or any relationship with the Bank that may affect the ability to act independently;
   b. The definitions of financial, management, ownership, and or family relationships with other members of the Board of Commissioners, members of the Board of Directors, and or controlling shareholders, or relationships with the Bank that may affect the ability to act independently, are determined in accordance with the provisions set out in the applicable laws and regulations, in particular the OJK Circular Letter on the Implementation of Corporate Governance for Commercial Banks.
5. Financial Services Authority Circular No. 28/SEOJK.03/2022 concerning Risk Management Certification for Commercial Bank Human Resources, which regulates that Ownership of a Risk Management Certificate is one aspect of assessing competency factors in assessing the ability and suitability of prospective members of the Board of Directors and prospective members of the Board of Commissioners in accordance with provisions of the Financial Services Authority regarding the fit and proper test for the main parties of financial services institutions.

6. Circular Letter of PT Danantara Asset Management (Persero) No. SE/002/DI-DAM/DO/2025 concerning Guidelines on Conduct and Professionalism of the Board of Directors and Board of Commissioners, which, inter alia, encourages:
   a. Continuously enhance capabilities, knowledge, and strategic insight to strengthen leadership effectiveness and the implementation of Good Corporate Governance.
   b. Participate in relevant leadership development programs and professional certifications, including those in finance, risk management, sustainability and ESG, digital transformation, as well as cross generational and cross-cultural leadership.
   c. Undertake training to strengthen oversight and internal control competencies, enabling the effective, independent, and risk-oriented performance of oversight functions.

STATEMENT OF INDEPENDENCE OF INDEPENDENT COMMISSIONERS

In line with the provisions of Article 25 paragraph (1) OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, BNI ensures that all Independent Commissioners in office have fulfilled the independence requirements as evidenced by the absence of financial, management, share ownership, and/or familial relationships with members of the Board of Directors, other members of the Board of Commissioners, and/or controlling shareholders, or relationships with other companies that may affect the person's ability to act independently. The following is a statement of independence from each Independent Commissioner:

Name	Has no financial relationship with the Board of Commissioners and Directors	Has No Management Relationship in BNI, Subsidiary, or Affiliated Companies	Has no Share Ownership Relationship in BNI	No Family Relationship with the Board of Commissioners, Board of Directors, and/ or Fellow Members of the Nomination and Remuneration Committee
Omar Sjawaldy Anwar	√	√	√	√
Vera Febyanthy	√	√	√	√
Didik Junaedi Rachbini	√	√	√	√

Each Independent Commissioner of BNI has signed a Statement Letter confirming the fulfillment of all eligibility criteria and the independence of the position in accordance with applicable laws and regulations, and has submitted such statement to the Financial Services Authority (OJK) as one of the requirements to participate in the fit and proper test process. During 2025, the Independent Commissioners in office were as follows:

Independence Attachment

Omar Sjawaldy Anwar
President Commissioner/
Independent Commissioner



Vera Febyanthy
Independent Commissioner



Didik Junaedi Rachbini
Independent Commissioner



Board of Directors

The Board of Directors is the primary organ within BNI's governance structure, which collectively assumes holding full authority and responsibility for the management of the Bank to achieve its goals aims and objectives. The Board of Directors also represents the Bank both inside and outside the courts, in accordance with the Articles of Association and applicable laws and regulations. In carrying out its duties and responsibilities, the Board of Directors has the authority to direct the Bank's operations, take strategic steps, and establish policies necessary to ensure the Bank's operational efficiency and effectiveness.

In discharging its duties, each member of the Board of Directors fulfils carries out their responsibilities in accordance with the division of duties and authorities, to ensure effective management and deliver optimal results. All of these duties shall be discharged in good faith in accordance with the Articles of Association, prioritizing the principles of banking prudence, professional ethics, the code of ethics, national and international banking conventions, and compliance with all applicable laws and regulations in Indonesia, including Bank Indonesia, the Financial Services Authority, and other relevant regulations.

LEGAL BASIS

The basis for the formation and appointment of BNI's Board of Directors refers to a number of laws, regulations, Articles of Association, and related regulations, including:

1. Law No. 40 of 2007 concerning Limited Liability Companies as amended by Law No. 6 of 2023 concerning Stipulation of Government Regulations in Lieu of Law No. 2 of 2022 concerning Job Creation becomes law;
2. Financial Services Authority Regulation No. 33/POJK.04/2014 concerning the Board of Directors and the Board of Commissioners of Issuers or Public Companies;
3. Regulation of the Minister of SOE Number PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
4. Regulation of the Minister of SOE Number PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises
5. Bank Articles of Association
6. The Board of Directors' Decree Number KP/339/DIR dated August 6, 2024, concerning the Charter of the Board of Directors of PT Bank Negara Indonesia (Persero)Tbk

BOARD OF DIRECTORS' CHARTER [ACGS D.1.1]

In fulfilling its responsibilities, the Board of Directors is guided by the Board of Directors' Charter, which was ratified through BNI Board of Directors' Decree No. KP/339/DIR dated August 6, 2024. This Board of Directors' Charter is a comprehensive framework containing guidelines and a code of ethics, is binding, and must be adhered to by all members of the Board of Directors.

The Bank's Board of Directors' Charter regulates various matters, including:

1. General Provisions;
2. Accountability and Responsibility of the Board of Directors;
3. Number, Composition, and Independence of the Board of Directors;
4. Guidelines for Ethics and Conduct of the Board of Directors, Requirements for Board Members;
5. Signing of Management Contracts for Board Members;
6. Procedures for Appointing Board Members;
7. Dismissal of Board Members;
8. Resignation of Board Members;
9. Expiration of a Board Member's Term of Office;
10. Company Management Policies by the Board of Directors;
11. Division of Duties and Authorities of the Board of Directors;
12. Arrangement of Authority and Decision-Making Procedures of the Board of Directors;
13. Duties, Authorities, and Obligations of the Board of Directors;
14. Actions of the Board of Directors that require written approval from the Board of Commissioners;
15. Actions of the Board of Directors that require approval from the GMS. These actions may only be carried out by the Board of Directors after receiving a written response from the Board of Commissioners and approval from the GMS.
16. Board of Directors Meeting;
17. Annual Management Contract and Key Performance Indicators;

18. Board of Directors Remuneration;
19. Board of Directors Succession Policy;
20. Income for Concurrent Positions;
21. Working Relationship between the Board of Directors and the Board of Commissioners;
22. Working Hours;
23. Leave of Directors Members;
24. Company Induction Program;
25. Competency Improvement for Board of Directors Members;
26. Transparency Aspects of the Board of Directors; and
27. Prohibition on Taking Personal Gain and Conflicts of Interest.

The Board of Directors Charter is periodically evaluated and updated in accordance with applicable Indonesian laws and regulations. The last update was made on January 28, 2026, and the document can be accessed through the official BNI website.

CRITERIA OR QUALIFICATIONS OF THE BOARD OF DIRECTORS [ACGS D.3.9, D.3.11]

BNI's Board of Directors is appointed through a selection process based on criteria and qualifications in accordance with statutory regulations, the application of GCG principles, and the Bank's strategic needs in realizing its vision, mission, and business plan. Each member of the Board of Directors must possess high integrity, adequate competence, extensive experience, and a relevant professional track record in the banking sector and other business areas that support the Bank's sustainable management.

The criteria for BNI's Board of Directors are shown in the following table:

Criteria or Requirement	Putrama Wahju Setyawan	Alexandra Askandar	Hussein Paolo Kartadjoemena	Corina Leyla Karnalies	David Pirzada	Ronny Venir	Toto Prasetio	Agung Prabowo	Muhammad Iqbal	Rian Eriana Kaslan	Abu Santosa Sudradjat	Eko Setyo Nugroho	Munadi Herlambang
1. Integrity, at least including:													
a) Proficient in performing legal actions in the 5 (five) years before appointment and during their term of office: • Has never been declared bankrupt; or • Has never been a member of the Board of Directors or a member of the Board of Commissioners found guilty of causing a company to be declared bankrupt based on a court decision.	√	√	√	√	√	√	√	√	√	√	√	√	√
b) Has good character and morals;	√	√	√	√	√	√	√	√	√	√	√	√	√
c) Has the commitment to comply with prevailing laws and regulations;	√	√	√	√	√	√	√	√	√	√	√	√	√
d) Has the commitment to develop sound Bank operations;	√	√	√	√	√	√	√	√	√	√	√	√	√
e) Has not been included in the list of those failing to pass the fit and proper test;	√	√	√	√	√	√	√	√	√	√	√	√	√
f) Has a commitment to not take and/or repeat certain actions and/or actions, for candidates for members of the Board of Directors or candidates for members of the Board of Commissioners who have not passed the fit and proper test and have undergone sanctions;.	√	√	√	√	√	√	√	√	√	√	√	√	√
2. Competencies, at least including:													
a) Sufficient knowledge in banking relevant to the position;	√	√	√	√	√	√	√	√	√	√	√	√	√

Criteria or Requirement	Putrama Wahju Setyawan	Alexandra Askandar	Hussein Paolo Kartadjoemena	Corina Leyla Karnalies	David Pirzada	Ronny Venir	Toto Prasetio	Agung Prabowo	Muhammad Iqbal	Rian Eriana Kaslan	Abu Santosa Sudradjat	Eko Setyo Nugroho	Munadi Herlambang
b) Has the experience and expertise in banking and/ or finance; and	√	√	√	√	√	√	√	√	√	√	√	√	√
c) The ability to carry out strategic management in the context of developing the company and its subsidiaries.	√	√	√	√	√	√	√	√	√	√	√	√	√
3. Has a good financial reputation with no bad loans;	√	√	√	√	√	√	√	√	√	√	√	√	√
4. Complies with the laws and regulations in the field of Banking, Capital Market, other laws and regulations and the Company's Articles of Association;	√	√	√	√	√	√	√	√	√	√	√	√	√
5. Between fellow members of the Board of Directors, and between members of the Board of Directors and members of the Board of Commissioners, it is prohibited to have blood relationship up to the third degree either in a straight line or a sideways line or an affair (son-in-law or brother-in-law).	√	√	√	√	√	√	√	√	√	√	√	√	√
6. Time commitment to the company	√	√	√	√	√	√	√	√	√	√	√	√	√

TERM OF OFFICE OF THE BOARD OF DIRECTORS [ACGS D.2.5]

The term of office of the BNI Board of Directors is set for a maximum of 2 (two) consecutive periods, with the following provisions and details:

1. The Board of Directors members are appointed for a period commencing from the date determined by the GMS that appoints them and ends at the closing of the 5 (fifth) Annual GMS after the date of appointment on condition that it should not exceed a period of 5 (five) years, by observing the laws and regulations in the Capital Market sector, but without reducing the right of the GMS to dismiss at any time any members of the Board of Directors before their term of office ends; and
2. Dismissal is effective from the closing of the GMS, unless otherwise determined by the GMS.

COMPOSITION, NUMBER, AND COMPOSITION (INCLUDING LEGAL BASIS FOR APPOINTMENT) OF THE BOARD OF DIRECTORS IN 2025

The number and composition of BNI's Board of Directors are determined proportionally, taking into account the Bank's strategic needs and aligning them with the Bank's characteristics, capacity, and business scale. This determination also prioritizes the principle of diversity within the Board of Directors, in terms of background, expertise, and experience, to ensure balanced representation that supports effective management, supervision, and decision-making at the Board of Directors level.

By 2025, all members of the Board of Directors are guaranteed to have met the requirements for number, composition, and other provisions as stipulated in the BNI Board of Directors' Guidelines and Work Procedures, namely:

1. The number of members of the BNI Board of Directors serving as of December 31, 2025, is 12 (twelve) people, consisting of 1 (one) President Director, and 1 (one) Deputy President Director;
2. 1 (one) Director who concurrently serves as Compliance Director and 9 (nine) other Directors;
3. The number of members of the BNI Board of Directors is greater than the number of members of the BNI Board of Commissioners;
4. All members of the BNI Board of Directors are domiciled in Jakarta, Indonesia;
5. The majority of members of the BNI Board of Directors have at least 5 (five) years of experience in the operational field as Bank executive officers;
6. The Board of Directors is led by the President Director, who comes from a party that is independent of the Controlling Shareholders, other members of the Board of Directors, and members of the BNI Board of Commissioners;
7. There placementand/orappointment of members of the BNI Board of Directors has considered the recommendations of the Nomination and Remuneration Committee and obtained approval from shareholders, including non-controlling shareholders, and obtained OJK approval; [ACGS A.2.2]

8. All members of the BNI Board of Directors do not have familial relationships up to the third degree with fellow members of the Board of Directors and/or Board of Commissioners or Controlling Shareholders; and
9. All members of the BNI Board of Directors have passed the Fit and ProperTest.

In connection with the dismissal, changes in position nomenclature, transfer of duties, and appointment of member of the Board of Directors based on the resolution of the 2025 Annual GMS held on March 26, 2025, the number and composition of the BNI Board of Directors underwent changes with the following description:

Period January, 1 2025 – March 26, 2025

Name	Position	Domicile	Basis of Appointment	Effective date of office	Term of Office
Royke Tumilaar	President Director	Jakarta	Extraordinary GMS on September 2, 2020	November 19, 2020	2020-2025
Putrama Wahju Setyawan	Deputy President Director	Jakarta	The Extraordinary GMS on August 31, 2022, then his assignment was transferred to Deputy President Director at the Annual GMS on March 4, 2024.	• December 23, 2022 • September 2, 2024	2022-2027
Novita Widya Anggraini	Finance Director	Jakarta	Extraordinary GMS on September 2, 2020	November 19, 2020	2020-2025
Corina Leyla Karnalies	Digital and Integrated Transaction Banking Director	Jakarta	Annual General Meeting of Shareholders on February 20, 2020	June 26, 2020	2020-2025
David Pirzada	Risk Management Director	Jakarta	Extraordinary GMS on September 2, 2020	December 1, 2020	2020-2025
Ronny Venir	Network and Services Director	Jakarta	Extraordinary GMS on September 2, 2020	November 6, 2020	2020-2025
Mucharom	Human Capital and Compliance Director	Jakarta	Extraordinary GMS on August 31, 2020	January 6, 2023	2022-2027
Toto Prasetio	Technology and Operations Director	Jakarta	Extraordinary GMS on August 31, 2020	January 31, 2023	2022-2027
I Made Sukajaya	Enterprise and Commercial Banking Director	Jakarta	Annual GMS on March 4, 2024	September 2, 2024	2024-2029
Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Jakarta	Annual GMS on March 4, 2024	September 2, 2024	2024-2029
Agung Prabowo	Wholesale and International Banking Director	Jakarta	Annual GMS on March 4, 2024	October 9, 2024	2024-2029
Munadi Herlambang	Institutional Banking Director	Jakarta	Annual GMS on March 4, 2024	December 1, 2025	2024-2029

*) Members of the Board of Directors become effective upon obtaining approval from the Financial Services Authority (OJK) following the Fit and ProperTest assessment, in accordance with OJK Regulation No. 27/POJK.03/2016 dated July 22, 2016 concerning the Fit and ProperTest for Key Parties of Financial Services Institutions.

Period March 26, 2025 – December 31, 2025

Name	Position	Domicile	Basis of Appointment	Effective date of office	Term of Office
Putrama Wahju Setyawan	President Director	Jakarta	Annual GMS on March 26, 2025	June 5, 2025	2022-2027
Alexandra Askandar	Deputy President Director	Jakarta	Annual GMS on March 26, 2025	June 5, 2025	2025-2029
Hussein Paolo Kartadjoemena	Finance and Strategy Director	Jakarta	Annual GMS on March 4, 2024, then his assignment was transferred to Director of Finance & Strategy at the Annual GMS on March 26, 2025	September 2, 2024	2024-2029
Corina Leyla Karnalies	Consumer Banking Director	Jakarta	Annual GMS on February 20, 2020, then reappointed as Director of Consumer Banking at the Annual GMS on March 26, 2025	June 26, 2020	2020-2025 2025-2029
David Pirzada	Risk Management Director	Jakarta	Extraordinary GMS on September 2, 2020, then reappointed as Director of Risk Management at the Annual GMS on March 26, 2025	December 1, 2020	2020-2025 2025-2029
Ronny Venir	Operations Director	Jakarta	Extraordinary GMS on September 2, 2020, then reappointed as Director of Operations at the Annual GMS on March 26, 2025	November 6, 2020	2020-2025 2025-2029
Toto Prasetio	Information Technology Director	Jakarta	The Extraordinary GMS on August 31, 2022, then his assignment was transferred to Director of Information Technology at the Annual GMS on March 26, 2025.	January 31, 2023	2022-2027
Agung Prabowo	Corporate Banking Director	Jakarta	Annual GMS on March 4, 2024, then his assignment was transferred to Director of Corporate Banking at the Annual GMS on March 26, 2025	October 9, 2024	2024-2029
Muhammad Iqbal	Commercial Banking Director	Jakarta	Annual GMS on March 26, 2025	August 12, 2025	2025-2029
Rian Eriana Kaslan	Network and Retail Funding Director	Jakarta	Annual GMS on March 26, 2025	August 12, 2025	2025-2029
Abu Santosa Sudradjat	Treasury and International Banking Director	Jakarta	Annual GMS on March 26, 2025	August 12, 2025	2025-2029
Eko Setyo Nugroho	Institutional Director	Jakarta	Annual GMS on March 26, 2025	August 12, 2025	2025-2029
Munadi Herlambang	Human Capital and Compliance Director	Jakarta	The Annual GMS on March 4, 2024, was then reassigned to become Director of Human Capital & Compliance at the Annual GMS on March 26, 2025.	November 28, 2025	2024-2029

* The Board of Directors is effective after obtaining OJK Approval on the Fit and ProperTest.This is in accordance with OJK regulation No. 27/POJK.03/2016 dated July 22, 2016 concerning Fit and ProperTest for Key Parties of Financial Services Institutions.

Based on the disclosure table above, it can be seen that the BNI Board of Directors is led by the President Director and does not include the position of Independent Director in connection with the implementation of the two-board system principle in BNI's governance structure. In this system, the functions and roles of the Independent Director are transferred to the Deputy President Director. The procedures for the selection and appointment of BNI's Directors always refer to the Director Succession Policy applicable within the Bank. As of December 31, 2025, no Director had previously served as President Director of BNI within the last 2 years. [ACGS D.4.3, D.4.5]

BNI's commitment to promoting leadership and the active role of women at the top management level is reflected in the election of Alexandra Askandar as Deputy President Director of the Bank, based on the resolutions of the 2025 Annual General Meeting of Shareholders. Based on the composition of the Board of Directors as of December 31, 2025, BNI has three female Directors with superior capacity, competence, and experience in their respective fields, as follows: [ACGS (B).D.1.1]

1. Alexandra Askandar: Deputy President Director
2. Corina Leyla Karnalies: Consumer Banking Director
3. Rian Eriana Kaslan: Network & Retail Funding Director

BNI consistently ensures the independence of each member of the Board of Directors in carrying out their duties and responsibilities. This is reflected in the fact that no member of the Board of Directors has served more than two terms of five years in the same capacity. Further information regarding the career history and complete profile of each member of the Board of Directors can be found in the Company Profile chapter, sub-chapter "Director's Profile" in the 2025 Annual Report.

MECHANISM FOR APPOINTMENT, DISMISSAL, AND RESIGNATION OF THE BOARD OF DIRECTORS [ACGS D.3.10]

The procedures and procedures for the dismissal and resignation of members of the Board of Directors are clearly regulated in BNI's Articles of Association, while still referring to the provisions of POJK No. 33/POJK.04/2014 and POJK No. 15/POJK.04/2020. The provisions in question cover the following:

1. The GMS may dismiss members of the Board of Directors at any time by stating the reasons.
2. The reasons for dismissing a member of the Board of Directors is based on fact that the concerned member of the Board of Directors:
   a. Did not perform/under performed in fulfilling the obligations agreed upon in the management contract.
   b. Did not perform their duties properly.
   c. Violated the provisions of Articles of Association and/or laws and regulations.
   d. Engaged in actions that harmed the Company and/or the State
   e. Committed actions that violated ethics and/or properness that must be upheld as Board of Directors.
   f. Convicted by a Court decision that has permanent legal force.
   g. Resigned.
   h. Other reasons considered appropriate by the GMS in the interests and objectives of the Company.
3. A decision for dismissal shall be made after the related person has had the opportunity to defend themself, except for reasons as referred to in item 2 letter f and g.
4. Dismissal for reasons as referred to in item 2, letter d and f shall constitute dishonorable dismissal.
5. A member of the Board of Directors may resign from their post before their term of office expires. In this matter, the member of the Board of Directors who resigns must submit a resignation request to the Company.
6. BNI must convene a GMS to resolve the resignation proposal of members of the Board of Commissioners no longer than 90 (ninety) days after receipt of the resignation letter.
7. Members of the Board of Directors who resign before or after their term of office ends, unless due to death, the person concerned shall still be responsible to submit accountability for actions not yet received by the GMS.
8. Members of Board of Directors may be dismissed temporarily by the Board of Commissioners by stating the reasons in the event that such a member acts in contrary to the Articles of Association or there is an indication of doing an action that harms the Company or is neglect in performing obligations or there are compelling reasons for the Company by considering the following provisions:
   a. Such temporary dismissal shall be notified in writing to the concerned member of the Board of Directors together with the reasons causing such action with a copy to the Board of Directors;
   b. The notification as referred to in item 8 letter a shall be delivered no later than 2 (two) business days after the determination of such temporary dismissal;
   c. The temporarily dismissed member of the Board of Directors is not authorized to perform Company management in the Company's interest in accordance with the Company's purposes and objectives nor represent the Company, either inside or outside court;
   d. Within a period of no later than 90 (ninety) days after such temporary dismissal, the Board of Commissioners shall convene a GMS to withdraw or enforce such temporary dismissal resolution;
   e. In the event that the time period to convene the GMS as referred to in item 8 letter d has passed or the GMS cannot adopt a resolution, then such temporary dismissal shall become void
   f. The limitation of authority in item 8 letter c shall be effective from the decision of temporary dismissal by the Board of Commissioners until:
   g. There is a GMS decision confirming or revoking the temporary dismissal in item 8 letter d; or
   h. The time period in item 8 letter d has passed.
   i. In the GMS as referred to in item 8 letter d, the related members of the Board of Directors are given an opportunity to defend themselves.
   j. Such temporary dismissals cannot be extended or reestablished for the same reasons, in the event that such temporary dismissal is declared void as referred to in item 8 letter e.

k. In the event that the GMS cancels a temporary dismissal or there are circumstances as referred to in item 8 letter e, then the related member of the Board of Directors must resume their duties properly.
l. In the event that the GMS reaffirms the temporary dismissal resolution, then the related member of the Board of Directors shall be dismissed going forward.
m. In the event that the temporary dismissed member of the Board of Directors is not present at the GMS after being summoned in writing, then the temporary dismissed member of the Board of Directors shall be deemed not to have exercised their right to defend themself in the GMS and has accepted the GMS resolution.

FIT AND PROPER ASSESSMENT

Each prospective member of the BNI Board of Directors is required to take and pass the Fit and Proper Test and obtain approval from the Financial Services Authority (OJK) before being able to carry out their duties and functions effectively, in accordance with the provisions of POJK No. 27/POJK.03/2016 concerning the Fit and Proper Assessment for Key Parties of Financial Services Institutions. All members of the BNI Board of Directors who are in office have been declared fit and proper without notes and have obtained approval from the OJK.

Fit and Proper Test

No.	Name	Position	Implementation	Results	OJK Approval Letter No.	Effective Date of Appointment
1.	Putrama Wahju Setyawan	President Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-51/D.03/2025	June 5, 2025
2.	Alexandra Askandar	Deputy President Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-50/D.03/2025	June 5, 2025
3.	Hussein Paolo Kartadjoemena	Finance and Strategy Director	OJK	Passed	OJK Board of Commissioners Decree No. KEP-102/D.03/2024	September 2, 2024
4.	Corina Leyla Karnalies	Consumer Banking Director	OJK	Passed	OJK Board of Commissioners Decree No. 37/KDK.03/2020	June 26, 2020
5.	David Pirzada	Risk Management Director	OJK	Passed	OJK Board of Commissioners Decree No. 86/KDK.03/2020	December 1, 2020
6.	Ronny Venir	Operations Director	OJK	Passed	OJK Board of Commissioners Decree No. 79/KDK.03/2020	November 6, 2020
7.	Toto Prasetio	Information Technology Director	OJK	Passed	OJK Board of Commissioners Decree No. KEP-13/D.03/2024	January 31, 2023
8.	Agung Prabowo	Corporate Banking Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-120/D.03/2024	October 9, 2024
9.	Muhammad Iqbal	Commercial Banking Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-103/D.03/2025	August 12, 2025
10.	Rian Eriana Kaslan	Network and Retail Funding Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-105/D.03/2025	August 12, 2025
11.	Abu Santosa Sudradjat	Treasury and International Banking Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-104/D.03/2025	August 12, 2025
12.	Eko Setyo Nugroho	Institutional Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-106/D.03/2025	August 12, 2025
13.	Munadi Herlambang	Human Capital and Compliance Director	OJK	Passed	OJK Board of Commissioners Decree No. KEPR-231/D.03/2025	November 28, 2025

DUTIES AND RESPONSIBILITIES OF THE BOARD OF DIRECTORS [ACGS D.1.3]

The Board of Directors has the duties, responsibilities, and authority to manage and administer the Bank to ensure the achievement of the Bank's operational objectives, while always adhering to applicable laws and regulations and based on GCG principles. In general, the Board of Directors assumes full responsibility as the authorized body to represent the Bank, both inside and outside the courts, in all legal actions and events, while adhering to the limitations stipulated in regulations, the Articles of Association, and GMS resolutions.

The following is a description of the Board of Directors' duties and responsibilities as a collegial body, as set out in the Board of Directors Charter:

1) The Company's Board of Directors is fully responsible for managing and conducting all actions on behalf of the Company in the best interests of the Company and in line with its purposes and objectives. In carrying out this mandate, the Board of Directors represents the Company both inside and outside the court in all matters and circumstances, while consistently observing and complying with applicable laws and regulations, the Articles of Association, and resolutions of the General Meeting of Shareholders (GMS).
2) Implementing sound corporate governance, robust risk management, and integrated compliance across the Company, aligned with developments in the banking ecosystem and supported by digitalization and technological innovation.
3) Striving for and ensuring that the Company's business and activities are carried out in accordance with its purposes, objectives, and business activities;
4) Preparing an Annual Report, including a Financial Statement as a manifestation of accountability for the Company's management, as well as the Company's financial documents as referred to in the Law on Company Documents;
5) Preparing a Financial Statement based on Financial Accounting Standards and submitting it to a Public Accountant for audit;
6) Submit the Balance Sheet and Profit and Loss Statement approved by the GMS to the Head of the State-Owned Enterprises Supervisory Agency (BP BUMN) in accordance with statutory provisions;
7) Prepare annual reports and other required reports in accordance with the mechanisms and provisions of statutory regulations;
8) Prepare the Company's organizational structure, complete with details and duties;
9) Provide explanations on all matters requested or inquired by members of the Board of Commissioners and Series A Dwiwarna Shareholders, in due observance of prevailing laws and regulations, particularly those applicable to the banking and capital market sectors.
10) Carry out other obligations in accordance with the provisions stipulated in statutory regulations, the Company's Articles of Association, and/or those stipulated by the GMS.

A more detailed description of the duties and responsibilities of the Board of Directors is set out in the Board of Directors Work Guidelines, which are available and accessible on the BNI website.

DIVISION OF DUTIES AND RESPONSIBILITIES OF EACH MEMBER OF THE BOARD OF DIRECTORS [ACGS D.1.3]

Each member of the BNI Board of Directors has distinct roles and responsibilities based on their respective areas of expertise, experience, and competencies, enabling them to provide complementary contributions to the Bank's management. This diversity of backgrounds and expertise is a key strength in supporting the effectiveness of the decision-making process, business strategy formulation, and the implementation of GCG principles. Through solid synergy among members of the Board of Directors, BNI continuously strives to innovate, improve performance, and create sustainable added value for all stakeholders.

The division of work scope and responsibilities of each member of the BNI Board of Directors is periodically determined through a Board of Directors Decree concerning Organizational Restructuring. For the period from January 1, 2025, to March 26, 2025, the implementation of the Board of Directors' duties refers to Board of Directors Decree No. KP/235/DIR/R dated Juni 7, 2024. Following changes in the composition and nomenclature of Board of Directors positions based on the resolutions of the 2025 Annual General Meeting of Shareholders held on March 26, 2025, the division of Board of Directors' duties for the period from March 26, 2025, to March 26, 2025, will be amended. December 31, 2025, The division of duties among the Board of Directors for the period from March 26, 2025 to December 31, 2025 was established through the Board of Directors' decree Number KP/377/DIR/R dated August 1, 2025.

The main duties and authorities of each member of the BNI Board of Directors throughout 2025 are as follows:

Division of Duties and Responsibilities of the Board of Directors

Period			Basics of Division of Tasks	
January 1, 2025-March 26, 2025			Board of Directors Decree Number KP/235/DIR/R dated June 7, 2024.	
No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities
1.	Royke Tumilaar	President Director	**Directorate/SEVP:** 1. Deputy President Director 2. Wholesale & International Banking Director 3. Enterprise & Commercial Banking Director 4. Institutional Banking Director 5. Digital & Integrated Transactions Banking Director 6. Human Capital & Compliance Director 7. Finance Director **Division/Unit/Functional Unit:** 1. Internal Audit Unit 2. Corporate Secretary Division	Lead and direct, control, and be responsible in accordance with its authority in terms of: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. To lead, supervise, and coordinate all business and operational activities of the company assisted by the Deputy President Director. (Board of Director's Decree No. KP/235/DIR/R dated June 235, 2024). 3. To chair all Board of Directors meetings. (AA Article 13 Paragraph (7)). 4. Sign each share certificate, collective share certificate, convertible bond, warrant, and/or other securities that can be converted into shares together with the President Commissioner. (AA Article 6 Paragraph (6)). 5. To lead, supervise, and coordinate all activities related to the Internal Audit Organization and Corporate Secretary Organization (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024).
2.	Putrama Wahju Setyawan	Deputy President Director	**Directorate/SEVP:** 1. Retail Banking Director 2. Risk Management Director 3. Technology & Operations Director 4. Network and Services Director Division/Unit/Functional Unit: Pension Fund Devision	Lead and direct, control, and be responsible in accordance with its authority in terms of: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the President Director in leading, supervising, and coordinating all BNI business and operational activities (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Leading, supervising, and coordinating all activities and the Pension Fund Organization (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 4. If the President Director is absent or unavailable, the Deputy President Director will chair the Board of Directors Meeting.
3.	Novita Widya Anggraini	Director of Finance	**Division/Unit/Functional Unit:** 1. Corporate Planning & Performance 2. Accounting Division 3. Procurement & Fixed Assets Division 4. Investor Relations Division 5. Subsidiaries Division Management 6. Office of Chief Economist Division 7. Data Management & Analytics Division	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with his/her authority, in the following matters: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the President Director in leading, supervising, and coordinating all BNI Financial activities (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Lead, supervise, and coordinate all activities and Organizations of Corporate Planning & Performance Management, Accounting Organizations, Procurement & Fixed Assets Organizations, Investor Relations Organizations, Subsidiaries Management Organizations, Office of Chief Economist Organizations, and Data Management & Analytics Organizations (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 4. Become Director of Regional Development Office 17 (CDV Memo No. CDV/2/536 dated March 20, 2024). 5. Become Director of Overseas, NewYork Branch (CDV Memo No. CDV/2/563 dated March 20, 2024).

Period			Basics of Division of Tasks	
January 1, 2025-March 26, 2025			Board of Directors Decree Number KP/235/DIR/R dated June 7, 2024.	
No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities
4.	Corina Leyla Karnalies	Director of Retail Banking	**Direcorate/SEVP:** SEVP Wealth Management **Divisions/Functional Units:** 1. Consumer Segment Division 2. Consumer Product Division 3. Card Business Division 4. Retail Productive Banking Division 5. Business Program Division 6. SORX Consumer Banking & Corporate Function **SEVP Wealth Management** directly supervises the following Divisions/ Functional Units: Wealth Management Division	Under the supervision of the Deputy President Director, leads directs, controls, and is responsible in accordance with its authority in terms of: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the Deputy President Director in leading, supervising, and coordinating all Retail Banking activities (Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Supervising the SEVP Wealth Management in leading, supervising, and coordinating all Wealth Management activities and organizations. 4. Leading, supervising, and coordinating all activities related to the Consumer Segment Organization, Consumer Product Organization, Card Business Organization, Retail Productive Banking Organization, Business Program Organization, and SORX Consumer Banking & Corporate Function (Director's Decree No. KP/235/DIR/R dated June 7, 2024).
5.	David Pirzada	Director of Risk Management	**Direcorate/SEVP:** 1. SEVP Credit Risk 2. SEVP Remedial & Recovery **Division/Unit/Functional Unit:** 1. Enterprise Risk Management Division 2. Operational Risk Management Division 3 Retail Credit Risk Division 4 Anti Fraud Unit 5 Senior Credit Risk Executive **SEVP Credit Risk directly supervises Division/Unit/ Functional Unit:** 1 Corporate & Enterprise Credit Risk Division 2) Commercial Credit Risk Division **SEVP Remedial & Recovery directly supervises Division/Unit/Functional Unit:** 1) Corporate Remedial & Recovery Division 2) Enterprise & Commercial Remedial & Recovery Division 3) Retail Collection & Recovery Division	Under the supervision of the Deputy President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the Deputy President Director in leading, supervising, and coordinating all BNI Risk Management activities, including Credit Risk and Remedial & Recovery. (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Supervise the SEVP Credit Risk in leading, supervising, and coordinating all activities and organizations within the Corporate & Enterprise Credit Risk and Commercial Credit Risk organizations. 4. Supervise the SEVP Remedial & Recovery in leading, supervising, and coordinating all activities and organizations within the Corporate Remedial & Recovery, Enterprise & Commercial Remedial & Recovery, and Retail Collection & Recovery organizations. 5. Lead, supervise, and coordinate all activities related to Enterprise Risk Management Organizations, Operational Risk Management Organizations, Retail Credit Risk Organizations, Anti-Fraud Organizations, Corporate & Enterprise Credit Risk Organizations, Commercial Credit Risk Organizations, Corporate Remedial & Recovery Organizations, Enterprise Organizations & Commercial Remedial & Recovery, Retail Collection & Recovery Organizations, and Senior Credit Risk Executive (Board of Director's Decree No. KP/235/ DIR/R dated June 7, 2024). 6. Become Director of Development for Regional Office 11 and Regional Office 03 (CDV Memo No. CDV/2/563 dated March 20, 2024) 7. Become Director of Overseas, London Branch and Amsterdam Rep. Office (CDV Memo No. CDV/2/563 dated March 20, 2024).

Period			Basics of Division of Tasks	
January 1, 2025-March 26, 2025			Board of Directors Decree Number KP/235/DIR/R dated June 7, 2024.	
No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities
6.	Ronny Venir	Network and Services Director	**Division/Unit/Functional Unit:** 1. Distribution Network & Sales Division 2. Agen46 Division 3. Customer Experience Center Division 4. SORX Network & Services 5. Regional Office 01-17	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the President Director in leading, supervising, and coordinating all BNI Network Services & activities. (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Lead, supervise, and coordinate all activities related to the Distribution Network & Sales Organization, Agen46 Organization, Customer Experience Center Organization, and SORX Network & Services (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 4. In charge and supervise all BNI Regional Offices (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 5. Become Director of Overseas, Hong Kong Branch (CDV Memo No. CDV/2/563 dated March 20, 2024). 6. Become Director of Guidance for Subsidiary Company - BNI Life Insurance. (CDV Memo No. CDV/2/563 dated March 20, 2024).
7.	Mucharom	Human Capital and Compliance Director	**Directorate/SEVP:** SEVP Human Capital **Division/Unit/Functional Unit:** 1. Human Capital Strategy Division 2. Human Capital Services Division 3. BNI University 4. Compliance Division 5. Legal Division 6. Policy Governance Division 7. HC Business Partner SEVP Human Capital directly supervises the following Divisions/ Functional Units: 1. Human Capital Strategy Division 2. Human Capital Services Division 3. BNI University 4. HC Business Partner	Under the supervision of the President Director, leads and directs, controls and is responsible in accordance with his/her authority, in the following matters: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the President Director in leading, supervising, and coordinating all business and operational activities of the company assisted by the Deputy President Director. (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Supervising the SEVP Human Capital in order to lead, supervise, and coordinate all activities and organizations of the Human Capital Strategy, Human Capital Services Organization, BNI University Organization, and Human Capital Business Partner Organization. 4. Leading, supervising, and coordinating all activities related to the Compliance Organization, Legal Organization, and Policy Governance Organization (Decree of the Director No. KP/235/DIR/R dated June 7, 2024). 5. Become Director of Development for Regional Office 2 and Regional Office 2 (CDV Memo No. CDV/2/563 dated March 20, 2024). 6. Become Director of Overseas Development, Tokyo Branch (CDV Memo No. CDV/2/563 dated March 20, 2024).

Period			Basics of Division of Tasks	
January 1, 2025-March 26, 2025			Board of Directors Decree Number KP/235/DIR/R dated June 7, 2024.	
No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities
8.	Toto Prasetio	Technology and Operations Director	**Directorate/SEVP:** **1. SEVP Information Technology** **2. SEVP Operations** **Division/Unit/Functional Unit:** 1. IT Strategy & Architecture Division 2. CISO Division 3. Operations Strategy & Development Division 4. SORXTechnology, Digital, & Operations **SEVP InformationTechnology directly supervises Division/Unit/Functional Unit:** 1. Wholesale Digital Delivery Division 2. Retail Digital Delivery Division 3. Application Development Division 4. IT Application Services Division 5. IT Infrastructure Management Division **SEVP Operations directly supervises Division/Unit/ Functional Unit:** 1. Banking Operations Division 2. Digital Operations Division 3. Credit Operations Division	Under the supervision of the President Director, leads, directs, controls, and is responsible in accordance with its authority in terms of: 1. Implementation of the Duties, Authorities, and Responsibilities of the Board of Directors as regulated in the Company's Articles of Association. 2. Assist the President Director in leading, supervising, and coordinating all business and operational activities of the company assisted by the Deputy President Director. (Board of Director's Decree No. KP/235/DIR/R dated June 7, 2024). 3. Supervise SEVP Information Technology in order to lead, supervise, and coordinate all activities and Wholesale Digital Delivery Organization, Retail Digital Delivery Organization, Application Development Organization, IT Application Services Organization, and IT Infrastructure Management Organization. 4. Supervise SEVP Operations in order to lead, supervise, and coordinate all activities and Banking Operations Organization, Digital Operations Organization, Credit operations Organization 5. To lead, supervise, and coordinate all activities related to IT Strategy & Architecture Organization, CISO Organization, Operations Strategy & Development Organization and SORX Technology, Digital Operations (SK Dir No. KP/235/DIR/R dated June 7, 2024). 6. To serve as the Supervising Director of the Regional Office 09 and Regional Office 15 (CDV Memo No. CDV/2/563 dated March 20, 2024). 7. Appointed as Supervisory Director of Subsidiary – BNI Ventures (Memo CDV No. CDV/2/563 dated March 20, 2024). 8. Appointed as Supervising Director of the Seoul Overseas Branch (Memo CDV No. CDV/2/563 dated March 20, 2024).
9.	I Made Sukajaya	Enterprise and Commercial Banking Director	**Division/Unit/Functional Unit:** 1. Enterprise Banking Division 2. Commercial Banking 1 Division 3. Commercial Banking 2 Division 4. Senior Business Executive	Under the supervision of the President Director, leads and directs, controls and is responsible in accordance with his/her authority, in the following matters: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Assist the President Director in leading, supervising, and coordinating all BNI Enterprise & Commercial Banking activities. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3. To lead, supervise, and coordinate all activities and Organizations of Enterprise Banking, Commercial Banking Organization 1, Commercial Banking Organization 2, and Senior Business Executive (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 4. To serve as the Supervising Director of the Regional Office 01 and Regional Office 10. (CDV Memo No. CDV/2/563 dated March 20, 2024).

Period			Basics of Division of Tasks	
January 1, 2025-March 26, 2025			Board of Directors Decree Number KP/235/DIR/R dated June 7, 2024.	
No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities
10.	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	**Directorate/SEVP:** SEVP Retail Digital Solutions **Division/Unit/Functional Unit:** 1. Wholesale Transaction Product & Partnership Division 2. Wholesale Digital Channel Division 3. Corporate Development & Transformation Division 4. Strategic Project **SEVP Retail Digital Solutions directly supervises Division/ Unit/Functional Unit:** 1. Retail Digital Product & Partnership Division 2. Retail Digital Channel Division 3. Marketing Communications Division	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Assist the Deputy President Director in leading, supervising, and coordinating all BNI Digital & Integrated Transaction Banking activities including Retail Digital Solutions (SK Dir No. KP/235/DIR/R dated June 7, 2024). 3. Supervise SEVP Retail Digital Solutions in order to lead, supervise, and coordinate all activities and the Retail Digital Product & Partnership Organization, Retail Digital Channel Organization and Marketing Communications Organization. 4. To lead, supervise, and coordinate all activities related to the Corporate Development & Transformation Organization, Strategic Projects, Wholesale Transaction Product & Partnership Organization, and Wholesale Digital Channel Organization (SK Dir No.KP/235/DIR/R dated June 7, 2024). 5. To serve as the Supervising Director of the Regional Office 14 and Regional Office 08 (CDV Memo No.CDV/2/563 dated March 20, 2024). 6. To serve as the Supervising Director of the Singapore Overseas Branch (CDV Memo No. CDV/2/563 dated March 20, 2024). 7. To serve as the Supervising Director of the Subsidiary– hibank (CDV Memo No. CDV/2/563 dated March 20, 2024).
11.	Agung Prabowo	Wholesale and International Banking Director	**Directorate/SEVP:** 1. SEVP Corporate Banking 2. SEVP Treasury **Division/Unit:** 1. Corporate Banking 1 Division 2. Corporate Banking 2 Division 3 Syndication & Structured Finance Division 4. International & Financial Institutions Division 5). Senior Business Executive 6. SORX Wholesale Banking 7. Overseas Branch **SEVP Corporate Banking directly supervises Division/Unit/Functional Unit:** 1. Corporate Banking 3 2. Corporate Banking 4 **SEVP Treasury directly supervises the Division/ Functional Units:** Treasury Division	Under the supervision of the President Director, to lead, direct, control and be responsible in accordance with his/her authority, in terms of: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Assisting the President Directorin leading,supervising, and coordinating all Wholesale and International Banking activities of BNI. (Decree of the Board of Directors No. KP/235/ DIR/R dated June 7, 2024). 3. Supervising SEVP Corporate Banking in order to lead, supervise and coordinate all activities and organizations of Corporate Banking 3 and Corporate Banking 4. 4. Supervising SEVP Treasury in order to lead supervise, and coordinate all activities and organizations of Treasury. 5. To lead, supervise, and coordinate all activities and Corporate Banking Organization 1, Corporate Banking Organization 2, Syndication & Structured Finance Organization, International & Financial Institutions Organization, Senior Business Executive, SORX Wholesale Banking, and Overseas Network. 6. To serve as the Supervising Director of the Regional Office 12 and Regional Office 06 (CDV Memo No. CDV/2/563 dated March 20, 2024). 7. To serve as the Supervising Director of the Subsidiary- BNI Sekuritas and BNI Remittance (SK Dir No. KP/235/DIR/R dated June 7, 2024).

Period			Basics of Division of Tasks	
January 1, 2025-March 26, 2025			Board of Directors Decree Number KP/235/DIR/R dated June 7, 2024.	
No.	Name	Position	Direct Supervision of Directorate/SEVP/Division	Scope of Work and Responsibilities
12.	Munadi Herlambang*	Institutional Banking Director	**Division/Unit/Functional Unit** 1. Institutional Banking 1 Division 2. Institutional Banking 2 Division	Under the supervision of the President Director, to lead direct, control and be responsible in accordance with his/her authority, in terms of: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. To assist the President Director in leading, supervising, and coordinating all BNI Institutional Banking activities. (Decree of the Board of Directors No. KP/235/DIR/R dated June 7, 2024). 3. To lead, supervise, and coordinate all activities related to Institutional Banking Organization 1 and Institutional Banking Organization 2 (Decree of the Director No. KP/235/DIR/R dated June 7, 2024). 4. To serve as the Supervising Director of the Regional Office 05 and Regional Office 16. (CDV Memo No. CDV/2/563 dated March 20, 2024).

* The duties of the Director of Corporate Banking are carried out in accordance with the Deputy Director regulations in accordance with BNI regulations.

In accordance with the results of the 2025 Annual GMS decision, in addition to dismissing the old members of the Board of Directors and appointing new members of the Board of Directors, the decision of the 2025 Annual GMS held on March 26, 2025 also stipulated changes to the nomenclature of positions and the transfer of assignments of members of the Board of Directors with the following description:

No.	Original Type	Change of Position to
1.	Wholesale and International Banking Director	Treasury & International Banking Director
2.	Digital and Integrated Transaction Banking Director	Commercial Banking Director
3.	Retail Banking Director	Direktur Consumer Banking
4.	Finance Director	Finance & Strategy Director
5.	Enterprise and Commercial Banking Director	Corporate Banking Director
6.	Institutional Banking Director	Institutional Director
7.	Technology and Operations Director	Information Technology Director
8.	Network and Services Director	Network & Retail Funding Director
9.	-	Operations Director

In line with the changes in job nomenclature and adjustments to the organizational structure as stipulated in the results of the 2025 Annual GMS decisions, the following are the names of the members of the Board of Directors who have experienced a transfer of duties since March 26, 2025:

No.	Name	Original Type	Change of Position to
1.	Corina Leyla Karnalies	Retail Banking Director	Consumer Banking Director
2.	Munadi Herlambang	Institutional Banking Director	Human Capital & Compliance Director
3.	Hussein Paolo Kartadjoemena	Digital and Integrated Transaction Banking Director	Finance & Strategy Director
4.	Ronny Venir	Network and Services Director	Operations Director
5.	Agung Prabowo	Wholesale and International Banking Director	Corporate Banking Director
6.	Toto Prasetio	Technology and Operations Director	Information Technology Director

With the transfer of duties of the members of the Board of Directors, the division of duties and division of tasks of the Board of Directors is as follows:

Period			Legal Basis for Division of Duties	
March 26, 2025-December 31, 2025			Board of Directors' Decree (SK) 377/DIR/R dated August 1, 2025 and CDV Memo Number CDV/2/1441 dated August 4, 2025	
No.	Name	Position	Direct Supervision: Director/SEVP/Division/ Unit/Functional Unit	Scope of Work and Responsibilities
1	Putrama Wahju Setyawan	President Director	1. Vice President Director 2. All Division Directors 3. Regional Office 4. Internal Audit Unit 5. Corporate Secretary Division	Leading, directing, controlling, and being responsible, in accordance with their authority, in the following areas: 1. Implementing the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Leading, supervising, and coordinating all business and operational activities of the company, assisted by the Deputy President Director. 3. Leading all Board of Directors meetings. 4. Signing all share certificates, collective share certificates, convertible bonds, warrants, and/or other securities convertible into shares together with the President Commissioner. 5. Leading, supervising, and coordinating all activities related to the Internal Audit Organization and the Corporate Secretary Organization. 6. Supervising the Regional Office
2.	Alexandra Askandar	Deputy President Director	1. All Division Directors 2. Environmental, Social & Governance Division	Leading, directing, controlling, and being responsible, in accordance with their authority, in the following areas: 1. Implementing the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Assisting the President Director in leading, supervising, and coordinating all BNI business and operational activities. If the President Director is absent or unavailable, the Deputy President Director shall chair the Board of Directors' Meeting. 3. Leading, supervising, and coordinating all activities related to the Environmental, Social, and Governance Organization.

Period			Legal Basis for Division of Duties	
March 26, 2025-December 31, 2025			Board of Directors' Decree (SK) 377/DIR/R dated August 1, 2025 and CDV Memo Number CDV/2/1441 dated August 4, 2025	
No.	Name	Position	Direct Supervision: Director/SEVP/Division/ Unit/Functional Unit	Scope of Work and Responsibilities
3.	David Pirzada	Risk Management Director	1. SEVP Credit Risk 2. SEVP Remedial & Recovery 3. Enterprise Risk Management Division 4. Operational Risk Management Division 5. Anti-Fraud Unit 6. Senior Credit Risk Executive **The SEVP Credit Risk directly supervises the following Divisions/ Functional Units:** 1. Corporate Credit Risk Division 2. Enterprise Credit Risk Division 3. Commercial Credit Risk Division 4. Retail Credit Risk Division **The SEVP Remedial & Recovery directly supervises the following Divisions/Functional Units:** 1. Corporate Remedial & Recovery Division 2. Enterprise & Commercial Remedial & Recovery Division 3. Retail Collection & Recovery Division	Under the supervision of the President Director and Deputy President Director, lead, direct, control, and be responsible, in accordance with their authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Assist the President Director and Deputy President Director in leading, supervising, and coordinating all BNI Risk Management activities, including Credit Risk and Remedial & Recovery. 3. Supervise the SEVP Credit Risk in leading, supervising, and coordinating all activities and organizations within the Corporate Credit Risk, Enterprise Credit Risk, Commercial Credit Risk, and Retail Credit Risk Divisions. 4. Supervise the SEVP Remedial & Recovery in leading, supervising, and coordinating all activities and organizations within the Corporate Remedial & Recovery Division, Enterprise & Commercial Remedial & Recovery, and Retail Collection & Recovery Division. 5. Lead, supervise, and coordinate all activities related to the Enterprise Risk Management, Operational Risk Management, Anti-Fraud, and Senior Credit Risk Executive Divisions.
4.	Abu Santosa Sudradjat	Treasury & International Banking Director	1. SEVP Treasury 2. International & Financial Institutions Division 3. Office of the Chief Economist Division 4. Overseas Network **The SEVP Treasury directly supervises the following Divisions/Functional Units:** 1. Treasury Division 2. Pension Fund Division	Under the supervision of the President Director and Deputy President Director, he/she leads, directs, controls, and is responsible, in accordance with his/her authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Assisting the President Director and Deputy President Director in leading, supervising, and coordinating all BNI Treasury and International Banking activities. 3. Supervising the SEVP Treasury in leading, supervising, and coordinating all activities and organization of the Treasury and Pension Fund Divisions. 4. Leading, supervising, and coordinating all activities and organization of the International & Financial Institutions Division, the Office of the Chief Economist, and the Overseas Network.

Period			Legal Basis for Division of Duties	
March 26, 2025-December 31, 2025			Board of Directors' Decree (SK) 377/DIR/R dated August 1, 2025 and CDV Memo Number CDV/2/1441 dated August 4, 2025	
No.	Name	Position	Direct Supervision: Director/SEVP/Division/ Unit/Functional Unit	Scope of Work and Responsibilities
5.	Muhammad Iqbal	Commercial Banking Director	1. SEVP Commercial & SME 2. Enterprise Banking Division 1 2. Enterprise Banking Division 2 3. Senior Business Executive **The SEVP Commercial & SME directly supervises the following Divisions/ Functional Units:** 1. Commercial Banking Division 1 2. Commercial Banking Division 2 3. SME Business Division 4. Business Program Division	Under the supervision of the President Director and Deputy President Director, the Bank leads, directs, controls, and is responsible, in accordance with its authority, for: 1. Implementing the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Supervising the SEVP Commercial & SME in leading, supervising, and coordinating all activities and organizations of Commercial Banking Divisions 1 & 2, SME Business, and Business Programs. 3. Leading, supervising, and coordinating all activities and organizations of Enterprise Banking Divisions 1 and 2, and Senior Business Executives.
6.	Munadi Herlambang	Human Capital & Compliance Director	1. SEVP Legal & Governance 2. SEVP Human Capital 2. Compliance Division 3. AML-CFT Division **The SEVP Legal & Governance directly supervises the following Divisions/Functional Units:** 1. Legal Division 2. Policy Governance Division **The SEVP Human Capital directly supervises the following Divisions/ Functional Units:** 1. Human Capital Strategy Division 2. Human Capital Services Division 3. BNI University 4. Human Capital Business Partner	Under the supervision of the President Director and Deputy President Director, the Bank leads, directs, controls, and is responsible, in accordance with its authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Supervising the SEVP Legal & Governance in leading, supervising, and coordinating all Legal and Policy Governance activities and organizations, as well as consultative lines regarding Compliance. 3. Supervising the SEVP Human Capital in leading, supervising, and coordinating all activities and organizations of the Human Capital Strategy Division, Human Capital Services, BNI University, and Human Capital Business Partners. 4. Leading, supervising, and coordinating all activities related to the Compliance Division and AML-CFT.

Period			Legal Basis for Division of Duties	
March 26, 2025-December 31, 2025			Board of Directors' Decree (SK) 377/DIR/R dated August 1, 2025 and CDV Memo Number CDV/2/1441 dated August 4, 2025	
No.	Name	Position	Direct Supervision: Director/SEVP/Division/ Unit/Functional Unit	Scope of Work and Responsibilities
7.	Corina Leyla Karnalies	Consumer Banking Director	1. SEVP Wealth Management 2. Consumer Segment Division 3. Consumer Product Division 4. Retail Digital Product & Partnership Division 4. Marketing Communications Division 5. Card Business Division 5. Senior Operational Risk Executive Consumer Banking & Corporate Function **The SEVP Wealth Management directly supervises the following Divisions/Functional Units:** 1. Wealth Management Division	Under the supervision of the President Director and Deputy President Director, he/she leads, directs, controls, and is responsible, in accordance with his/her authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 3. Supervising the SEVP Wealth Management in leading, supervising, and coordinating all activities and organization of the Wealth Management Division. 4. Leading, supervising, and coordinating all activities related to the Consumer Segment, Consumer Product, Retail Digital Product & Partnership, Marketing Communications, Card Business, and Senior Operational Risk Executive Consumer Banking & Corporate Function.
8.	Hussein Paolo Kartadjoemena	Finance & Strategy Director	1. Corporate Planning & Performance Management Division 2 Accounting Division 3 Procurement & Fixed Assets Division 4. Investor Relations Division 5. Subsidiaries Management Division 6. Corporate Development & Transformation Division 7. Transformation Project	Under the supervision of the President Director and Deputy President Director, the Company leads, directs, controls, and is responsible, in accordance with its authority, for: 1. The implementation of the duties, authorities, and obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. To assist the President Director and Vice President Director in leading, supervising, and coordinating all of BNI's financial activities. 3. Leading, supervising, and coordinating all activities and organizations of the Corporate Planning & Performance Management, Accounting, Procurement & Fixed Assets, Investor Relations, Subsidiaries Management, Corporate Development & Transformation divisions, and providing assistance to the Transformation Project.
9.	Ronny Venir	Operations Director	1. Credit Operations Division 2. Digital Operations Division 3. Banking Operations Division 4. Customer Experience Center Division 5. Operations Strategy & Development Division	Under the supervision of the President Director and Deputy President Director, the Company leads, directs, controls, and is responsible, in accordance with its authority, for: 1. Implementing the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Leading, supervising, and coordinating all activities and organization of the Credit Operations, Digital Operations, Banking Operations, Customer Experience Center, and Operations Strategy & Development Divisions.

Period			Legal Basis for Division of Duties	
March 26, 2025-December 31, 2025			Board of Directors' Decree (SK) 377/DIR/R dated August 1, 2025 and CDV Memo Number CDV/2/1441 dated August 4, 2025	
No.	Name	Position	Direct Supervision: Director/SEVP/Division/ Unit/Functional Unit	Scope of Work and Responsibilities
10.	Agung Prabowo	Corporate Banking Director	1. SEVP Wholesale Solutions & Value Chain 2. Corporate Banking Division 1 3. Corporate Banking Division 2 4. Corporate Banking Division 3 5. Corporate Banking Division 4 6. Senior Business Executive 7. Senior Operational Risk Executive Wholesale Banking **The SEVP Wholesale Solutions & Value Chain directly supervises the following Divisions/ Functional Units:** 1. Syndication & Structured Finance Division 2. Wholesale Transaction Product & Value Chain Division 3. Wholesale Transaction Digital Channel Division.	Under the supervision of the President Director and Deputy President Director, he/she leads, directs, controls, and is responsible, in accordance with his/her authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Supervising the SEVP Wholesale & Value Chain in leading, supervising, and coordinating all activities and organization of the Syndication & Structured Finance Division, Wholesale Transaction Product & Value Chain, and Wholesale Transaction Digital Channel. 3. Leading, supervising, and coordinating all activities and organization of Corporate Banking Divisions 1 to 4, Senior Business Executives, and Senior Operational Risk Executives for Wholesale Banking
11.	Eko Setyo Nugroho	Institutional Director	1. SEVP Government Solution 2. Institutional Banking Division 1 3. Institutional Banking Division 2 **The SEVP Government Solution directly supervises the following Divisions/Functional Units:** 1. Government Solution	Under the supervision of the President Director and Deputy President Director, the Bank leads, directs, controls, and is responsible, in accordance with its authority, for: 1. Implementing the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Supervising the SEVP Government Solution in leading, supervising, and coordinating all activities and organizations within Government Solution. 3. Leading, supervising, and coordinating all activities and organizations within Institutional Banking 1 and 2.

Period			Legal Basis for Division of Duties	
March 26, 2025-December 31, 2025			Board of Directors' Decree (SK) 377/DIR/R dated August 1, 2025 and CDV Memo Number CDV/2/1441 dated August 4, 2025	
No.	Name	Position	Direct Supervision: Director/SEVP/Division/ Unit/Functional Unit	Scope of Work and Responsibilities
12.	Toto Prasetio	Information Technology Director	1. SEVP Information Technology 2. IT Strategy & Architecture Division 3. CISO Division 4. AI & Big Data Analytics Division 5. Senior Operational Risk Executive Technology & Operations **The SEVP Information Technology directly supervises the following Divisions/Functional Units:** 1. Wholesale Digital Delivery Division 2. Retail Digital Delivery Division 3. Application Development Division 4. IT Application Services Division 5. IT Infrastructure Management Division	Under the supervision of the President Director and Deputy President Director, lead, direct, control, and be responsible, in accordance with their authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Supervise the SEVP of Information Technology in leading, supervising, and coordinating all activities and organizations within the Wholesale Digital Delivery, Retail Digital Delivery, Application Development, IT Application Services, and IT Infrastructure Management Divisions. 3. Lead, supervise, and coordinate all activities and organizations within the IT Strategy & Architecture, CISO, AI & Big Data Analytics, and Senior Operational Risk Executive Technology & Operations Divisions.
13.	Rian Eriana Kaslan	Network & Retail Funding Director	1. SEVP Network & Sales 2. Retail Digital Channel Division 3. Agent 46 Division 4. Senior Operational Risk Executive Network & Retail **The SEVP Network & Sales directly supervises the following Divisions/ Functional Units:** 1. Network Strategy & Development Division 2. Sales Strategy & Execution Division 3. Branch Transformation Project	Under the supervision of the President Director and Deputy President Director, lead, direct, control, and be responsible, in accordance with their authority, for: 1. Implementation of the Duties, Authorities, and Obligations of the Board of Directors as stipulated in the Company's Articles of Association. 2. Supervise the SEVP Network & Sales in leading, supervising, and coordinating all activities and organizations within the Network Strategy & Development, Sales Strategy & Execution, and Branch Transformation Project divisions, as well as providing a dotted line to the Regional Office. 3. Lead, supervise, and coordinate all activities and organizations within the Retail Digital Channel Division, Agen46, and the Senior Operational Risk Executive Network & Retail.

AUTHORITY OF THE BOARD OF DIRECTORS

In carrying out its duties and responsibilities, the Board of Directors has a number of authorities regulated and established in accordance with the provisions of the Bank's Articles of Association. The Board of Directors' authorities are as follows:

1. Set up the Company's management policies, taking into account applicable regulations;
2. Set up policies for synergy between the Company and the Majority Series B and Series C Shareholders, guided by the policies established by the Majority Series B and Series C Shareholders;
3. Arrange the transfer of the Board of Directors' authority to represent the Company, both inside and outside the Court, to a person or persons specifically appointed for that purpose, including Company employees, either individually or jointly, and/or other bodies;
4. Regulate provisions regarding Company employees, including determining wages, pensions, old-age security, and other income for Company employees in accordance with applicable laws and regulations;
5. Appoint and dismiss Company employees in accordance with applicable labor regulations and laws and regulations;

6. Appoint and dismiss the Corporate Secretary and/or Head of the Internal Audit Unit with the approval of the Board of Commissioners after first obtaining the approval of the Majority Series B and Series C Shareholders;
7. Write off the Company's Fixed Assets and/or other Assets in accordance with the provisions stipulated in these Articles of Association and which will then be reported to the Board of Commissioners and accounted for in the Annual Report;
8. Relinquish the right to collect or not collect interest, fines, fees, and other receivables other than the principal amount incurred in the context of restructuring and/or settlement of receivables, as well as other actions in the context of settling the Company's receivables, provided that prior approval from BPI Danantara is obtained in accordance with laws and regulations in the field of State-Owned Enterprises;
9. Relinquish the right to collect or not collect bad principal receivables that have been written off in the context of credit settlement, either in part or in full, which will be implemented based on policies established by the Board of Directors with the approval of the Board of Commissioners and within the write-off ceiling (limit) determined by the GMS, which will remain in effect until a new ceiling (limit) is determined by the GMS, provided that prior approval from BPI Danantara is obtained in accordance with laws and regulations in the field of State-Owned Enterprises;
10. Establish the Company's write-off and receivables write-off policies with the approval of the Board of Commissioners and the majority shareholders of Series B and Series C shares, taking into account applicable provisions, and propose the write-off limit as referred to in point 9) to be determined by the GMS;
11. Establish Committees as needed;
12. Carry out all other actions and deeds regarding the management and ownership of the Company's assets, bind the Company with other parties and/or other parties with the Company, and represent the Company inside and outside the court regarding all matters and all events, with limitations as stipulated in laws and regulations, these Articles of Association, and/or GMS decisions.

BOARD OF DIRECTORS' RESPONSIBILITIES

As regulated in the BNI Board of Directors' Work Guidelines and Procedures, the Board of Directors is responsible for:

1. Promoting and ensuring the implementation Promoting and ensuring the implementation
2. Establishing on time the Company's Long Term Plan, the Company's Annual Work Plan and Budget, and other work plans, and any amendments to be submitted to the Board of Commissioners for approval;
3. Preparing the Shareholders Register, Special Register, GMS Minutes, and Minutes of the Board of Directors' meetings;
4. Preparing the Annual Report, which contains the Financial Statements, as a form of accountability of the Company's management as well as the Company's financial documents as referred to in Law on Company Documents;
5. Preparing the Financial Statements based on the Financial Accounting Standards and submit them to Public Accountant to be audited;
6. Delivering the Annual Report after review by the Board of Commissioners within a maximum period of 5 (five) months after the Company's fiscal year ends to the GMS for approval and ratification;
7. Providing explanation to the GMS on the Annual Report;
8. Delivering the Balance Sheet and Income Statement after approval by the GMS to the Minister in charge of Law in accordance with the provisions of laws and regulations;
9. Submit reports on the implementation of write-offs and write-offs in accordance with laws and regulations;
10. Prepare other reports required by laws and regulations;
11. Keep the Shareholder Register, Special Register, Minutes of the GMS, Minutes of Board of Commissioners Meetings, and Minutes of Board of Directors Meetings, the Annual Report and the Company's financial documents as referred to in these Articles of Association, as well as other Company documents;
12. File and manage, both physically and/or electronically at the Company's domicile, the following: the Shareholder Register, Special Register, Minutes of the GMS, Minutes of Board of Commissioners Meetings, and Minutes of Board of Directors Meetings, the Annual Report and the Company's financial documents, as well as other Company documents;
13. Do and maintain the Company's bookkeeping and administration in accordance with applicable corporate practice;
14. Establish an accounting system in accordance with Financial Accounting Standards and based on the principles of internal control, particularly the management, recording, storage, and oversight functions;
15. Provide periodic reports in a manner and on a timeframe consistent with applicable laws and regulations, as well as other reports whenever requested by the Board of Commissioners and/or

Series A Dwiwarna Shareholders and/or Series B and Series C Shareholders with the largest number of shares, taking into account laws and regulations, particularly provisions in the Capital Market and Banking sectors;
16. Prepare the Company's organizational structure, complete with details and duties;
17. Provide explanations on all matters inquired or requested by members of the Board of Commissioners, Series A Dwiwarna Shareholders and/or Series B and Series C Shareholders with the largest number of shares, taking into account laws and regulations, particularly provisions in the Banking and Capital Market sectors;
18. Implement integrated governance, risk management, and capital requirements for the Financial Conglomerate;
19. Prepare a Board of Directors Charter, Risk Management Charter, Internal Audit Charter, and other documents, with due consideration all regulatory provisions especially those in the Banking and Capital Market sectors;
20. Carry out other obligations in accordance with the provisions - which are regulated in laws and regulations, these Articles of Association - and/or those determined by the GMS.

BOARD OF DIRECTORS' ACTIONS THAT MUST OBTAIN GMS APPROVAL

In carrying out management functions, there are a number of specific actions that can only be carried out by the Board of Directors after obtaining approval from the GMS, namely as follows:
1. The Board of Directors is responsible for requesting approval from the GMS to:
   a. Transfer the Company's assets; or
   b. Make collateral for debts of the Company's assets, which constitute more than 50% (fifty percent) of the Company's net assets in 1 (one) or more transactions, whether related to each other or not, except for the implementation of the Company's business activities in accordance with Article 3 of the Articles ofAssociation.
2. Actions carried out without the approval of the GMS remain binding on the Company as long as the other parties to the legal action have good intentions; and
3. The GMS may reduce restrictions on the actions of the Board of Directors as regulated in these Articles of Association or determine other restrictions on the Board of Directors other than those regulated in the Articles of Association.

BOARD OF DIRECTORS' ACTIONS THAT MUST OBTAIN WRITTEN APPROVAL FROM THE BOARD OF COMMISSIONERS [ACGS D.1.2]

The following is a list of actions or decisions of the Board of Directors that must obtain written approval from the Board of Commissioners:
1. Write off the Company's assets within certain value thresholds as determined by the Board of Commissioners, taking into account the prevailing laws and regulations governing State-Owned Enterprises, as follows:
   a. Write-offs due to the transfer/disposal of the Company's fixed assets;
   b. Write-offs due to the transfer/disposal of the Company's other assets;
   c. Write-offs of the Company's fixed assets and/or other assets other than those resulting from transfer/disposal;

   excluding the Company's assets in the course of carrying out its business activities in accordance with applicable laws and regulations, including but not limited to assets in the form of loans, securities, foreclosed collateral, movable assets, and other assets acquired in the course of the Company's business activities, with due regard to regulations in the capital markets and banking sectors;
2. Pledge the Company's assets as collateral within certain value thresholds as determined by the Board of Commissioners, excluding assets utilized in the ordinary course of the Company's business activities in accordance with applicable laws and regulations, including but not limited to loans, securities, foreclosed collateral, movable assets, and other assets acquired in the course of business, with due regard to regulations in the capital markets and banking sectors.
3. Enter into cooperation arrangements with business entities or other parties in the form of licensing agreements, management contracts, asset leases, Joint Operations (KSO), Build Operate Transfer (BOT), Build Own Transfer (BoT), Build Transfer Operate (BTO), and other similar arrangements that do not constitute the Company's day-to-day business activities, within certain value or term limits as determined by the Board of Commissioners.
4. Make equity investments in subsidiaries, joint ventures, and/or other companies, including the establishment of subsidiaries and/or joint ventures, within certain value thresholds as determined by the Board of Commissioners, except in the context of debt recovery, with due regard to capital market and banking regulations.
5. Reduce equity participation, including through dilution, in subsidiaries, joint ventures, and/or other companies within certain value thresholds as determined by the Board of Commissioners,

except in the context of debt recovery, with due regard to capital market and banking regulations.
6. Divest equity participation in subsidiaries, joint ventures, and/or other companies within certain value thresholds as determined by the Board of Commissioners, except in the context of debt recovery, with due regard to capital market and banking regulations.
7. Undertake mergers, consolidations, acquisitions, spin-offs, and dissolution of subsidiaries and joint ventures within certain value thresholds as determined by the Board of Commissioners, with due regard to capital market and banking regulations.
8. Undertake actions that constitute material transactions as defined under capital market regulations, within certain value thresholds as determined by the Board of Commissioners, except for transactions exempted under applicable capital market regulations.
9. Determine and amend the Company's logo.
10. Determine the organizational structure one level below the Board of Directors.
11. Undertake actions not stipulated in the Company's Work Plan and Budget (RKAP)

Relinquish or no longer keep the right to collect interest receivables, fines, fees, and other receivables outside the principal amount carried out in the context of restructuring and/or settlement of receivables and other actions in the context of settling the Company's receivables on condition that approval from BPI Danantara shall be obtained first in accordance with laws and regulations in the field of BUMN.

Determine policies on write-off and write-off claim of the Company's receivables with the approval of the Board of Commissioners and Series B Shareholders and Majority Series C Shareholders by taking into account applicable provisions, and to propose the above write-off ceiling (limit) amount to be determined by the GMS.

Approval of the Board of Commissioners in relation to items 1, 2, 3, 4, 5, 6, 7 and 8 above with certain limits and/or criteria shall be determined after obtaining approval from the Series A Dwiwarna Shareholder or Series B Shareholders and Majority Series C Shareholders. Determination of limits and/or criteria by the Board of Commissioners for matters as referred to in items 1, 2, 3, 4, 5, 6, 7 and 8 above shall be carried out after obtaining approval from Series B Shareholders and Majority Series C Shareholders. Approval of the Board of Commissioners in relation to item 11 above shall be determined after obtaining approval from Series B Shareholders and Majority Series C Shareholders. Actions of the Board of Directors as referred to in item 3 above insofar as required in the framework of carrying out business activities commonly carried out in the banking business sector by taking into account provisions of laws and regulations, shall not require approval from the Board of Commissioners and/or the GMS.

BOARD OF DIRECTORS' ACTIONS THAT MUST GET A RESPONSE FROM THE BOARD OF COMMISSIONERS

In order to maintain a balance between the supervisory function and strategic decision-making, there are several actions of the Board of Directors whose implementation requires a written response from the Board of Commissioners and approval from the GMS, namely:
1. Carry out actions that are included in material transactions asstipulated by statutory regulations in the Capital Market sector with a value above 50% (fifty percent) of the Company's equity, unless such actions are included in material transactions that are excluded by statutory regulations that apply in the Capital Market sector;
2. Carrying out transactions that contain a conflict of interest as determined in the applicable laws and regulations in the Capital Market;
3. Carrying out other transactions to comply with applicable laws and regulations in the Capital Market.

If within 30 (thirty) days of receiving the request or complete explanation and documents from the Board of Directors, the Board of Commissioners does not provide a written response, then the GMS can decide without a written response from the Board of Commissioners. Actions carried out without the approval of the GMS remain binding on the Company as long as the other parties to the legal action have good intentions.

DIRECTOR IN CHARGE OF COMPLIANCE FUNCTIONS

In order to ensure that all Bank operational activities are carried out in accordance with the provisions of applicable laws and regulations and to mitigate the risk of non-compliance that could potentially cause losses to the Bank and stakeholders, BNI implements preventive measures

(ex-ante) to prevent violations from occurring, as well as curative measures (ex-post) as a handling effort if deviations are found. To strengthen the implementation of the compliance function, BNI has appointed a Director who specifically oversees the compliance function (Compliance Director), namely Mr. Munadi Herlambang. The appointment of the BNI Compliance Director has fulfilled the independence requirements as stipulated in POJK No. 46 / POJK.03 / 2017, without overseeing other functions that are not permitted.

As part of BNI's commitment to strengthening governance and compliance, the Compliance Director is primarily responsible for ensuring that all Bank policies and operational activities are implemented in accordance with regulatory requirements. In addition to overseeing compliance, the Compliance Director is also responsible for ensuring the Bank's compliance is consistently maintained, fostering a culture of compliance at all levels of the organization, and ensuring compliance risks are managed effectively and sustainably.

Further details regarding the Compliance Function's implementation and achievements in implementing Compliance Programs and Activities throughout 2025 are provided in more detail in the Compliance Work Unit sub-chapter within this Annual Report.

REQUIREMENTS FOR THE DIRECTOR IN CHARGE OF THE COMPLIANCE FUNCTION

Each Director candidate proposed to oversee the Compliance Function at BNI is required to meet individual criteria and requirements as stipulated by the regulator, to ensure integrity, independence, and competence in carrying out the compliance function. These criteria include:

1. Prospective Directors who are in charge of the compliance function must have integrity and adequate knowledge regarding the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations; and
2. The Director in charge of the Compliance Function is required to fulfill independence requirements. "Independence requirements" are not having financial, management, share ownership, and/or familial relationships up to the third degree with members of the Board of Commissioners, the Board of Directors, and/or controlling Shareholders or relationships with the Bank that could affect their ability to act independently as intended in provisions regarding the Implementation of Good Corporate Governance for Commercial Banks.

DUTIES AND RESPONSIBILITIES OF THE DIRECTOR IN CHARGE OF THE COMPLIANCE FUNCTION

The duties and responsibilities of the Director in charge of the Compliance Function include at least:

1. Formulate a strategy to encourage the creation of a Bank Compliance Culture;
2. Propose a compliance policy or compliance principles that will be determined by the Board of Directors;
3. Establish compliance systems and procedures that will be used to develop Bank internal regulations and guidelines;
4. Ensure that all regulatory policies, systems and procedures, as well as business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations;
5. Minimizing Bank Compliance Risk;
6. Take preventive measures so that policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations;
7. In order to implement theAnti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Financing for the Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM), the Compliance Director has the duties and responsibilities of at least:
   a. Proposing strategic written policies and procedures regarding the implementation of the APU PPT and PPPSPM programs to the Board of Commissioners;
   b. Ensure that the implementation of APU PPT and PPPSPM is carried out in accordance with established written policies and procedures;
   c. Ensure that the scope of active supervision of the Board of Directors is fulfilled adequately;
   d. Monitor and maintain the Bank's compliance Monitor and maintain the Bank's compliance the Financial Services Authority, including commitments in the Action Plan, Data Update Activity Plan Report, and the results of Bank Indonesia supervision related to the implementation of the APU PPT and PPPSPM Programs;
   e. Monitor the implementation of the duties of the Special Work Unit and/or Bank officials responsible for the implementation of APU PPT and PPPSPM;
   f. Provide recommendations to the President Director regarding officials who will lead the Special Work Unit or officials responsible for implementing the APU PPT and PPPSPM Programs;

g. Providing approval for Suspicious Financial Transaction Reports (LTKM);
h. Propose an Action Plan Report and Data Update Plan Report before submitting it to the Financial Services Authority; and
i. Ensure that officials and/or employees, especially from related work units and new employees, have attended training related to the implementation of APU PPT and PPPSPM once a year.

8. The Director in charge of the Compliance function is obliged to submit a report to the Financial Services Authority regarding the implementation of his duties, including:
   a. Compliance Work Plan contained in the Bank Business Plan;
   b. Compliance Report; and
   c. Special reports regarding policies and/or decisions of the Board of Directors, which, according to the Director in charge of the Compliance function, have deviated from the provisions of the Financial Services Authority and/or applicable laws and regulations as part of the duties of the Director in charge of the Compliance function.
9. Report the implementation of duties and responsibilities to the President Director with a copy to the Board of Commissioners at least quarterly;
10. Perform other tasks related to the Compliance function.

ORGANIZATIONAL STRUCTURE OF THE DIRECTOR IN CHARGE OF THE COMPLIANCE FUNCTION

To ensure the effectiveness of the implementation of the compliance function, BNI has established an organizational structure that is under the direct supervision of the Director in charge of the Compliance Function, as explained below:

1. The President Director and/or Deputy President Director are not permitted to hold concurrent positions as Directors in charge of the Compliance function.
2. The Director who is in charge of the Compliance function is prohibited from being in charge of the following functions:
   a. Business and operations;
   b. Risk management, which makes decisions on the Bank's business activities;
   c. Treasury;
   d. Finance and accounting;
   e. Logistics and procurement of goods/ services;
   f. InformationTechnology; and
   g. Internal audit.
3. Replacement of the Director in charge of the Compliance function:
   a. In the event that the Director in charge of the Compliance function is unable to carry out his/her office duties for more than 7 (seven) consecutive working days then the relevant Director must be temporarily replaced by another Director until the Director in charge of the Compliance function is able to carry out his/her office duties again;
   b. In the event that the Director in charge of the Compliance function is permanently absent, resigns, or his/her term of office has expired, the Bank is obliged to immediately appoint a replacement for the Director in charge of the Compliance function, no later than 6 (six) months after the Director in charge of the Compliance function is permanently absent, resigns, or his/her term of office expires;
   c. During the process of replacing the Director in charge of the Compliance function, the Bank is obliged to appoint or assign another Director to temporarily carry out the duties of the Director in charge of the Compliance function;
   d. Directors carrying out temporary duties as Directors in charge of the Compliance function are required to fulfill the above requirements. This is excepted if there is no Director in the Company who fulfills these requirements; and
   e. The temporary replacement of the position of Director in charge of the Compliance function must be reported to the Financial Services Authority.

POLICY ON CONCURRENT POSITIONS OF THE BOARD OF DIRECTORS [ACGS D.2.6, D.2.7]

BNI is committed to maintaining the professionalism and independence of its Board of Directors through the implementation of a strict policy regarding concurrent positions. This policy was formulated to ensure that each member of the Board of Directors can optimally carry out their duties and responsibilities without any conflicts of interest that could affect objectivity in decision-making. This policy aligns with the Regulation of the Minister of State-Owned Enterprises No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, which emphasizes that members of the Board of Directors are only permitted to hold concurrent positions within the limits stipulated by applicable laws and regulations.

As a form of compliance with the provisions of applicable laws and regulations, all members of the BNI Board of Directors are prohibited from holding concurrent positions as members of the Board of Commissioners, Directors, or Executive Officers

at other banks, companies, and/or institutions, except for positions expressly permitted by applicable regulations. However, there are exceptions that are not included in the category of concurrent positions, if a member of the Board of Directors has responsibility for supervision at a Bank Subsidiary Company, carries out functional duties as a member of the Board of Commissioners at a non-bank Subsidiary Company controlled by the Bank, as long as the concurrent position does not result in the person concerned neglecting the implementation of duties and responsibilities as a member of the Bank Board of Directors

General provisions regarding concurrent positions for the Board of Directors are regulated in the following regulations:

1. Based on SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, members of the Board of Directors are prohibited from holding concurrent positions as:
   a. Board of Directors of SOE, Regional Owned Enterprises, Private Owned Enterprises;
   b. Board of Commissioners/Supervisory Board at SOE and other companies;
   c. Other structural and functional positions in central and/or regional government agencies/institutions;
   d. Other positions in accordance with provisions in statutory regulations;
   e. Political party administrators, legislative members and/or regional heads/deputy regional heads;
   f. Other positions that may give rise to a conflict of interest; and/or
   g. Become a legislative candidate or candidate for regional head/deputy regional head.

2. In addition to the concurrent positions mentioned above, members of the BNI Board of Directors are prohibited from holding concurrent positions as members of the Board of Commissioners in other companies, except:
   a. The Board of Commissioners of the relevant SOE subsidiary/SOE-affiliated company, provided that they are only entitled to the highest income from the position held concurrently, unless otherwise determined by the Minister; and
   b. Board of Commissioners in other companies to represent/stand for the interests of SOE as long as they obtain permission from the Minister of SOE.

As a form of transparency and implementation of the principle of accountability in good corporate governance, the following information is presented regarding the concurrent positions of members of the BNI Board of Directors as of December 31, 2025:

Name	Position in the Bank	Member of Board of Directors of State-Owned Enterprises, Regional Owned Enterprises, Private Owned Enterprises	Political Party Management and/or Candidates Members of DPR, DPD, DPRD Level I, and DPRD Level II and/or Regional Head/ Deputy Regional Head Candidates	Other Positions in Accordance with the Provisions of Laws and Regulations	Other Positions that can Cause a Conflict of Interest	Position in Subsidiary
Putrama Wahju Setyawan	President Director	No	No	No	No	No
Alexandra Askandar	Deputy President Director	No	No	No	No	No
David Pirzada	Risk Management Director	No	No	No	No	No
Abu Santosa Sudradjat	Treasury & International Banking Director	No	No	No	No	No
Muhammad Iqbal	Commercial Banking Director	No	No	No	No	No
Munadi Herlambang	Human Capital & Compliance Director	No	No	No	No	No
Corina Leyla Karnalies	Consumer Banking Director	No	No	No	No	No

Name	Position in the Bank	Member of Board of Directors of State-Owned Enterprises, Regional Owned Enterprises, Private Owned Enterprises	Political Party Management and/or Candidates Members of DPR, DPD, DPRD Level I, and DPRD Level II and/or Regional Head/ Deputy Regional Head Candidates	Other Positions in Accordance with the Provisions of Laws and Regulations	Other Positions that can Cause a Conflict of Interest	Position in Subsidiary
Hussein Paolo Kartadjoemena	Finance & Strategy Director	No	No	No	No	No
Ronny Venir	Operations Director	No	No	No	No	No
Agung Prabowo	Corporate Banking Director	No	No	No	No	No
Eko Setyo Nugroho	Institutional Director	No	No	No	No	No
Toto Prasetio	Information Technology Director	No	No	No	No	No
Rian Eriana Kaslan	Network & Retail Funding Director	No	No	No	No	No

MANAGEMENT OF CONFLICTS OF INTEREST OF THE BOARD OF DIRECTORS

[ACGS A.8.2]

In implementing the principles of good corporate governance, BNI consistently upholds the values of integrity and transparency, including in managing potential conflicts of interest at the Board of Directors level. Each member of the Board of Directors is required to act independently and professionally, prioritizing the interests of the Company above their personal interests or those of any affiliated parties. If a potential conflict of interest situation is identified, the relevant Director is required to publicly declare their involvement and withdraw from the decision-making process.

The provisions and mechanisms for managing conflicts of interest for BNI's Board of Directors are stipulated in the Conflict of Interest Handling Guidelines No. IN/119/CMP/001 dated December 27, 2024. The steps required by members of the Board of Directors to address conflict of interest situations include:

1. Must prioritize the economic interests of the Company above the economic interests of personal or family or other parties;
2. Not to use his/her position for personal interests or for the interests of other people or parties that conflict with the interests of the Company;
3. Must fill out a Special List containing his/her and/or his/her family's share ownership of 5% (five percent) or more in banks or other companies domiciled at home and abroad;
4. Must disclose financial and familial relationships with other members of the Board of Commissioners, members of the Board of Directors, and/or controlling shareholders of the Company;
5. Prohibited from taking actions that could harm the Company or reduce the Company's profits and must disclose conflicts of interest in every decision in the event of a conflict of interest; and
6. Not to participate in discussions and decision-making that contain elements of conflict of interest.

PARTICIPATION OF BOARD OF DIRECTORS MEMBERS IN PROFESSIONAL

ASSOCIATIONS AND/OR ORGANIZATIONS

Several members of the BNI Board of Directors actively participate in various industry associations and professional organizations as a way of contributing to the development of the banking sector and enhancing professional competence. All of these engagements are carried out without neglecting their primary duties and responsibilities as members of the Bank's Board of Directors, and therefore do not fall under the category of concurrent positions.

The details of the current BNI Board of Directors' participation are presented below:

No.	Name	Position in Bank	Position in Association/Organization
1.	Putrama Wahju Setyawan	President Director	Chairman - Association of State-Owned Banks (HIMBARA)
2.	Alexandra Askandar	Deputy President Director	• Treasurer - Perbanas • Deputy Chair III - Central Executive Board of the Indonesian Association of Economists (ISEI) • Strategic Advisory Board - University of Indonesia Alumni Association (ILUNI)
3.	Hussein Paolo Kartadjoemena	Finance & Strategy Director	• Treasurer I – Association of State-Owned Banks (HIMBARA) • Deputy Chair for Social Affairs – Indonesian Bankers Association (IBI)
4.	Corina Leyla Karnalies	Consumer Banking Director	• Supervisory Board at AKKI (Indonesian Credit Card Association) • Deputy Chairman - Indonesian Payment Systems Association (ASPI)
5.	David Pirzada	Risk Management Director	• Risk Management Coordinator - Association of State-Owned Banks (HIMBARA) • Director of Financial Risk Management - BARa
6.	Ronny Venir	Operations Director	Secretary General - Banking Operational Directors Communication Forum (FKDOP)
7.	Toto Prasetio	Information Technology Director	• Deputy Chairperson of Division III - BUMN Digital Forum (Fordigi) • Chairperson of IT & Operations, Perbanas
8.	Agung Prabowo	Corporate Banking Director	-
9.	Muhammad Iqbal	Commercial Banking Director	-
10.	Rian Eriana Kaslan	Network & Retail Funding Director	-
11.	Abu Santosa Sudradjat	Treasury & International Banking Director	• Secretary General - Indonesian Money Market and Foreign Exchange Market Association) • Code of Ethics Council - Himdasun (Debt Securities Traders Association) • Honorary Board - ACI - FMA Indonesia (Association Cambista Internasional - Financial Markets Association Indonesia)
12.	Eko Setyo Nugroho	Institutional Director	Secretary - Association of State-Owned Banks (HIMBARA)
13	Munadi Herlambang	Human Capital & Compliance Director	• Secretary Coordinator - Association of State-Owned Banks (HIMBARA) • Head of Division 1 Organization Development & Workforce Planning

POLICY ON THE PROVISION OF LOANS FOR THE BOARD OF DIRECTORS [ACGS A.8.3]

BNI does not prohibit the provision of loan facilities to members of the Board of Directors as long as it is carried out in accordance with the credit policies in force at BNI and is guided by the provisions of applicable laws and regulations. All loans provided to the Board of Directors must meet the same terms and conditions as those applicable to non-affiliated parties. This policy is implemented by upholding the principles of arm's length basis and at market rates, as stipulated in the Company Guidelines for Business Banking Credit Procedures for the Corporate & Enterprise Segment, Book I, Chapter on Credit Approval, and the Board of Directors' Charter.

INDEPENDENCE OF THE BOARD OF DIRECTORS [ACGS A.8.2]

BNI ensures that each member of the Board of

Directors carries out their duties independently, upholding professionalism and objectivity. All strategic and operational decisions must be taken without intervention from any party, so that the Bank's management is always oriented towards the interests of BNI, shareholders, and other stakeholders in accordance with GCG principles. Likewise, each member of the Board of Directors is also obliged to disclose to the Bank if they have a material interest, whether directly, indirectly, or on behalf of a third party, in transactions or issues that directly impact the Bank. This obligation also includes disclosure of any changes in share ownership, whether in the name of an individual or a family, in BNI or in other banks, non-bank financial institutions, and other companies. As a form of commitment to the implementation of the principle of independence, each member of the BNI Board of Directors is required to sign a Statement of Acting Independently in the Implementation of the Company's Operational Management at the beginning of each year as evidence of integrity and a statement of independence in carrying out their duties.

Statement of Independence of Members of the Board of Directors

Statement	Putrama Wahju Setyawan	Alexandra Askandar	Hussein Paolo Kartadjoemena	Corina Leyla Karnalies	David Pirzada	Eko Setyo Nugroho	Toto Prasetio	Agung Prabowo	Muhammad Iqbal	Rian Eriana Kaslan	Abu Santosa Sudradjat	Eko Setyo Nugroho	Munadi Herlambang
An independent party with no affiliation to the Bank's owner or Controlling Shareholder (PSP)	√	√	√	√	√	√	√	√	√	√	√	√	√
Has no financial, managerial, share ownership, and/or family relationship with other members of the Board of Commissioners, members of the Board of Directors, and/or the controlling shareholder, or any other relationship that may affect the ability to act independently.	√	√	√	√	√	√	√	√	√	√	√	√	√

BOARD OF DIRECTORS' SHARE OWNERSHIP [ACGS C.1.3]

In accordance with the provisions of OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks Article 32 letter a, the BNI Board of Directors has disclosed share ownership of 5% (five percent) or more, both in the Bank concerned, and in other banks and/or companies, domiciled in Indonesia and abroad. The share ownership of the BNI Board of Directors as of December 31, 2025 can be seen in the table below:

Name	Position	Share Ownership	
		BNI	Other Bank or Company
Putrama Wahju Setyawan	President Director	5,997,426	None
Alexandra Askandar	Deputy President Director	-	None
Hussein Paolo Kartadjoemena	Finance & Strategy Director	3,075,911	None
Corina Leyla Karnalies	Consumer Banking Director	5,513,174	None
David Pirzada	Risk Management Director	4,866,684	None
Ronny Venir	Operations Director	5,546,296	None
Toto Prasetio	Information Technology Director	4,222,896	None
Agung Prabowo	Corporate Banking Director	1,915,356	None
Muhammad Iqbal	Commercial Banking Director	3,064,085	None

Rian Eriana Kaslan	Network & Retail Funding Director	802,397	None
Abu Santosa Sudradjat	Treasury & International Banking Director	-	None
Eko Setyo Nugroho	Institutional Director	311,797	None
Munadi Herlambang	Human Capital & Compliance Director	-	None

BOARD OF DIRECTORS MEETING

Policies and Implementation of Board of Directors Meetings

In carrying out business activities and managing the Bank, the BNI Board of Directors maintains a regular communication forum through Board of Directors Meetings, which are held periodically at least once a month. Furthermore, Board of Directors Meetings may be held at any time deemed necessary by one or more members of the Board of Directors, or upon written request from one or more members of the Board of Commissioners.

The policy for implementing these Board of Directors Meetings is in accordance with the provisions of POJK No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, as well as Article 13 of BNI's Articles of Association and the Board of Directors Charter. The following is a description of the policy for implementing BNI's Board of Directors Meetings:

Meeting Implementation	1. The Board of Directors is obliged to hold regular Board of Directors Meetings at least once per month. 2. The Board of Directors is obliged to hold regular Board of Directors and Board of Commissioners meetings at least once every 1 (one) months. 3. The Board of Directors is obliged to determine the rules for the Board of Directors' meetings. 4. Board of Directors Meetings can be held at any time if: a. deemed necessary by one or more members of the Board of Directors; b. Upon written request from one or more members of the Board of Commissioners.
Meeting Summon	1. Meetings can be held at the Company's domicile or at other places within the territory of the Republic of Indonesia or at the Company's place of business activities. 2. Summons for Board of Directors Meetings must be made by members of the Board of Directors who have the right to represent the Board of Directors. 3. Summons for Board of Directors Meetings must be made in writing and conveyed or delivered directly to each member of the Board of Directors with adequate receipt or by registered post or by courier service or by telex, fax, or electronic mail (e-mail) no later than 5 (five) working days before the meeting is held without taking into account the date of summons and the date of the meeting or within a shorter time if in urgent circumstances. 4. Summons for the Board of Directors Meeting must include the agenda, date, time, and place of the meeting. Board of Directors meetings can be held at the Company's domicile or at other places within the territory of the Republic of Indonesia or at the Company's place of business activities. [ACGS D.3.6] 5. Board of Directors' meeting materials are distributed to all meeting participants no later than 5 (five) working days before the meeting is held, and in case the meeting is held outside the schedule, meeting materials can be submitted before the meeting is held.
Chairman of the Board of Directors Meeting	1. All Board of Directors Meetings are chaired by the President Director, and in case the President Director is absent or unable to attend, then the Deputy President Director who chairs the Board of Directors Meeting or a Director appointed in writing by the President Director who chairs the Board of Directors Meeting if at the same time the Deputy President Director is absent or is unavailable, or the Director is appointed by the Deputy Director who chairs the Board of Directors Meeting if at the same time the President Director is absent or unavailable and does not make the appointment. 2. If the GMS does not appoint a Deputy President Director, then in the event that the President Director is absent or unavailable, one of the Directors appointed in writing by the President Director will chair the Board of Directors Meeting. 3. In the event that the President Director does not make an appointment, then one of the Directors who has served the longest as a member of the Board of Directors shall chair the Board of Directors Meeting. 4. In the event that the Director who has served the longest as a member of the Company's Board of Directors is more than 1 (one) person, then the Director referred to in number 3 above is the oldest in age who acts as chairman of the Board of Directors Meeting.

Attendance	1. A member of the Board of Directors may be represented at a Board of Directors Meeting only by another member of the Board of Directors based on a power of attorney. A member of the Board of Directors can only represent another member of the Board of Directors. 2. Members of the Board of Directors who are unable to attend a Board of Directors Meeting can submit their opinion in writing and sign it, then convey it to the President Director or Deputy President Director or to other members of the Board of Directors who will chair the Board of Directors Meeting, regarding whether they support or do not support the matters to be discussed, and opinions will be considered as valid votes cast at the Board of Directors Meeting. 3. In the event that members of the Board of Directors are unable to attend the meeting physically, members of the Board of Directors can attend the meeting via teleconference, video conference, or other electronic media, in accordance with applicable regulations. 4. Every member of the Board of Directors who personally in any way, either directly or indirectly, has an interest in a transaction, contract, or proposed contract in which the Company is a party must have the nature of his interest declared at a Board of Directors Meeting and therefore has no right to take part in voting on matters relating to the transaction or contract.
Quorum and Decision Making [ACGS D.3.4]	1. A Board of Directors meeting is valid and has the right to make binding decisions if attended and/or represented by more than 2/3 (two thirds) of the total members of the Board of Directors. 2. In the event that there is more than one proposal, a re-election is carried out so that one of the proposals receives more than 2/3 (two thirds) of the total votes cast. 3. Decisions at Board of Directors Meetings must be taken based on deliberation to reach consensus. If a decision based on deliberation to reach a consensus is not reached, then the decision must be taken by voting based on the affirmative votes of more than 2/3 (two thirds) of the number of valid votes cast at the relevant meeting. 4. At a Board of Directors Meeting, each member of the Board of Directors has the right to cast 1 (one) vote and an additional 1 (one) vote for each other member of the Board of Directors whom he or she legally represents at the meeting. 5. A blank vote (abstain) is deemed to approve the proposal submitted at the meeting. Invalid votes are considered non-existent and are not counted in determining the number of votes cast at the meeting. 6. Voting regarding individuals is carried out using closed ballot papers without signatures, while voting regarding other matters is carried out verbally, unless the Chairman of the Meeting determines otherwise without any objection based on the majority of votes from those present. 7. Every policy and strategic decision must be decided through a Board of Directors meeting with due regard to supervision in accordance with the duties and responsibilities of the Board of Commissioners.
Minutes of Meetings	1. The results of the Board of Directors Meeting must be stated in the Minutes of Meeting.The minutes of the meeting must be drawn up by someone present at the meeting appointed by the Chairman of the Meeting and then signed by all members of the Board of Directors present and submitted to all members of the Board of Directors. 2. The results of the Board of Directors and Board of Commissioners meetings must be included in the Minutes of Meeting.The minutes of the meeting must be drawn up by someone present at the meeting appointed by the Chairman of the Meeting and then signed by all members of the Board of Directors and members of the Board of Commissioners present and submitted to all members of the Board of Directors and members of the Board of Commissioners. 3. In the event that there are members of the Board of Directors and/or members of the Board of Commissioners who do not sign the results of the meeting as referred to in points 1 and 2 above, the person concerned is obliged to state the reasons in writing in a separate letter attached to the Minutes of Meeting. 4. The minutes of the meeting as referred to in points 1 and 2 above must be documented by the Company. 5. Minutes of the Board of Directors' Meetings are valid evidence for members of the Board of Directors and for third parties regarding the decisions taken at the relevant Meeting. 6. Board of Directors is required to prepare minutes of Board of Directors' meetings and document them in accordance with statutory regulations and articles of association. 7. Dissenting opinions that occur at Board of Directors meetings must be stated clearly in the minutes of the meeting along with the reasons for the difference of opinion.
Keputusan di Luar Rapat Direksi	The Board of Directors can also make valid decisions without holding a Board of Directors Meeting provided that all members of the Board of Directors have been notified in writing and all members of the Board of Directors have given their approval regarding the proposal submitted in writing and signed the approval. Decisions taken in this way have the same force as decisions legally taken at a Board of Directors Meeting.

Level of Attendance of the Board of Directors Members at the Board of Directors Meetings, Joint Meetings of the Board of Directors and the Board of Commissioners, and GMS [ACGS D.3.2, D.3.3]

In 2025, the Board of Directors held 46 (forty-six) Board of Directors Meetings and 8 (eight) Board of Directors Meetings with the Board of Commissioners, as well as 1 (one) Annual General Meeting of Shareholders. The following is a description of the frequency and attendance of each member of the Board of Directors at the Meetings:

Name	Position	Board of Directors Meeting [ACGS D.3.5]			BOD and BOC Meetings			Annual GMS 2025 for the Year 2024			AGM Meeting 2025		
		Number and (%) Attendance			Number and (%) Attendance			Number and (%) Attendance			Number and (%) Attendance		
		Total Meeting	Level of Attendance	Attendance Percentage	Total Meeting	Level of Attendance	Attendance Percentage	Total Meeting	Level of Attendance	Attendance Percentage	Total Meeting	Level of Attendance	Attendance Percentage
Royke Tumilaar*	President Director	8	8	100	1	1	100	1	1	100	-	-	-
Novita Widya Anggraini*	Finance Director	8	8	100	1	1	100	1	1	100	-	-	-
Mucharom*	Human Capital and Compliance Director	8	8	100	1	1	100	1	1	100	-	-	-
I Made Sukajaya*	Enterprise and Commercial Banking Director	8	8	100	1	1	100	1	1	100	-	-	-
Putrama Wahju Setyawan	President Director	46	46	100	8	7	88	1	1	100	1	1	100
Alexandra Askandar**	Deputy President Director	38	36	95	7	6	86	-	-	-	1	1	100
David Pirzada	Risk Management Director	38	36	95	8	8	100	1	1	100	1	1	100
Abu Santosa Sudradjat**	Treasury & International Banking Director	38	35	92	7	6	86	-	-	-	1	1	100
Muhammad Iqbal**	Commercial Banking Director	38	34	89	7	6	86	-	-	-	1	1	100
Munadi Herlambang	Human Capital & Compliance Director	46	36	95	8	7	88	1	1	100	1	1	100
Corina Leyla Karnalies	Consumer Banking Director	46	36	95	8	7	88	1	1	100	1	1	100
Hussein Paolo Kartadjoemena	Finance & Strategy Director	46	44	96	8	7	88	1	1	100	1	1	100
Ronny Venir	Operations Director	46	43	93	8	7	88	1	1	100	1	1	100
Agung Prabowo	Corporate Banking Director	46	40	87	8	7	88	1	1	100	1	1	100
Eko Setyo Nugroho**	Director of Governance	38	36	95	7	6	86	-	-	-	1	1	100
Toto Prasetio	Information Technology Director	46	44	96	8	7	88	1	1	100	1	1	100
Rian Eriana Kaslan**	Network & Retail Funding Director	38	35	92	7	6	86	-	-	-	1	1	100

*) His position as Director of BNI ended in line with the expiration of his term as a member of the Board of Directors, as determined by the decision of the AGM on March 26, 2025.
**) His position as Director of the BNI since the decision of the AGM on March 26, 2025.

Agenda, Date, and Participants of the 2025 Board of Directors Meeting [ACGS D.3.5]

The following is a description of the agenda, implementation dates, and participants of the BNI Board of Directors Meetings throughout 2025, as a form of transparency and accountability in the implementation of the Board of Directors' functions:

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
1.	January 08, 2025	1. General Agenda, including Financial Performance Update 2. Sales Tool & Monitoring	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
2.	January 13, 2025	1. Clearance Meeting for the Audit of BNI's Consolidated Financial Statements 2. Sales Rhythm Monitoring 3. Project Approval 4. Approval of Resolutions on the Agenda of the 2024 General Meeting of Shareholders, including: a. Proposed Cash Dividends b. Proposed Corporate Actions 5. Human Capital Committee 6. Asset & Liability Committee (ALCO)	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
3.	January 22, 2025	1. General Agenda 2. Approval of the Proposed Cash Dividend	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
4.	February 03, 2025	• Human Capital Committee • Performance Updates	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
5.	February 17, 2025	1. Human Capital Committee 2. Remuneration Update 3. General Agenda, including BNI's 79th Anniversary Update 4. Savings Commission Initiative Progress Update 5. Data Quality Reward 6. Technology Management Committee (KMT)	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
6.	February 24, 2025	1. General Agenda including BNI's 79th Anniversary 2. Term Update	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
7.	March 10, 2025	1. Project Update 2. Savings Umbrella Program 3. Corporate Action Submission 4. Discussion of BNI's Risk Appetite Statement (RAS) Review 5. Technology Management Committee (KMT) 6. Asset & Liability Committee (ALCO) 7. Human Capital Committee 8. General Agenda	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
8.	March 17, 2025	1. Human Capital Committee 2. Update Performance 3. Performance Value Chain 4. Update Projects	· Royke Tumilaar · Putrama Wahju Setyawan · Novita Widya Anggraini · Corina Leyla Karnalies · David Pirzada · Ronny Venir · Mucharom · Toto Prasetio · I Made Sukajaya · Hussein Paolo Kartadjoemena · Agung Prabowo · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
9.	March 27, 2025	Organizational Structuring	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
10.	April 09, 2025	1. Human Capital Committee 2. Asset & Liability Committee (ALCO) 3. Update Performance	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
11.	April 21, 2025	1. Technology Management Committee (KMT) 2. Credit Policy Committee 3. Financial Report Updates	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • On Duty • Present	BNI Meeting Room
12.	May 05, 2025	1. Asset & Liability Committee (ALCO) 2. Review of Credit Approval Authority 3. Wondr Update by BNI	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
13.	May 19, 2025	1. Proposed Client Tiering 2025 2. Overview of ATM & CSR Performance	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
14.	May 23, 2025	BNI Townhall Meeting 2025	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
15.	May 27, 2025	BNI Java Jazz Festival 2025 Event Update	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • On Duty • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
16.	May 28, 2025	BNI Java Jazz Festival 2025 Event Update	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • On Duty • On Duty • Present • Present • Present • On Duty • Present • Present • Present	BNI Meeting Room
17.	June 02, 2025	1. Subsidiary Committee 2. Human Capital Committee	· Putrama Wahju Setyawan* · Alexandra Askandar* · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
18.	June 25, 2025	1. BNI Best Employee 2025 2. Human Capital Committee	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
19.	June 30, 2025	1. Anti-Money Laundering Training Update 2. BNI 79th Anniversary Agenda Update 3. Approval of the Extension of the Tapenas Cash Back Program	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
20.	07 Juli 2025 July 07, 2025	ICOFR Implementation Update	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
21	July 11, 2025	1. Organizational Restructuring (Directorate Division) of BNI 2. Review of Derivative Procedures for Bank Credit Policies (KPB) 3. Financial Report Updates	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
22.	July 14, 2025	1. Service Procurement Committee 2. Technology Management Committee (KMT) 3. Update on BNI Mobile Banking Closure 4. Update on Dormant Account Progress	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
23.	July 28, 2025	1. Human Capital Committee 2. CRM Request 3. BNI Rejeki Wondr Program Update 4. BNI WondrX 2025 Update	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • On Duty • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
24.	August 04, 2025	Human Capital Committee	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Presen • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
25.	August 12, 2025	Update Financial Reports	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho* · Muhammad Iqbal* · Abu Santosa Sudradjat* · Rian Eriana Kaslan* · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
26.	August 25, 2025	1. Organizational Restructuring 2. Financial Report Updates 3. BNIMove Digital Capability	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
27.	August 31, 2025	Business Continuity Management (BCM) Business Continuity Management (BCM)	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
28.	September 01, 2025	1. Kick-Off Meeting for Audit Implementation in December 2025 2. General Agenda, including Optimization of FBI Bank Guarantee, Trade, and Letter of Credit 3. Structuring of the Board of Directors Committee 4. Organizational Restructuring of the Network Strategy & Development Division, Sales Strategy & Execution Division, and Government Solutions Division	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • On Leave • Present • Present • Present • Present • Present • Present	BNI Meeting Room
29.	September 08, 2025	1. Corporate Action Plan 2. Review of Commercial Segment Credit Approval Authority & Division of Directors and SEVP Functions within the Credit Committee 3. Deactivation of the Crisis Management Team 4. Optimization of FBI Bank Guarantees, Trade Guarantees, and Letters of Credit	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
30.	September 15, 2025	1. Corporate Action Plan 2. Review of Commercial Segment Credit Approval Authority & Division of Directors and SEVP Functions within the Credit Committee 3. Deactivation of the Crisis Management Team 4. Optimization of FBI Bank Guarantees, Trade Guarantees, and Letters of Credit	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
31.	September 22, 2025	1. General Agenda, including 2025 Program Follow-up Update 2. Subsidiary Committee 3. Product Committee: a. Approval of the Proposed RPP for September 2025; b. Update on Wonder by BNI R5	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present • Present	BNI Meeting Room
32.	September 29, 2025	1. Asset & Liability Committee (ALCO) 2. General Agenda including Macro Update of the 2025 Program 3. Implementation of Piloting New Region, Area, & Branch Models	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Permission • Present • Present	BNI Meeting Room
33.	October 06, 2025	1. General Agenda 2. Review of Corporate Governance Guidelines 3. Wondr Update by BNI 4. Socialization of Platform/FSCM, SPAN, and Leading Model Construction for Ecosystems	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • On Leave • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
34.	October 14, 2025	1. Financial Report Update 2. International Project Update 3. IT Project Update 4. Approval of Corporate Governance Guidelines Review	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • On Duty • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
35.	October 20, 2025	General Agenda	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • On Duty • On Duty • Present • On Duty • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
36.	October 22, 2025	Approval regarding the 2026 RKAP/RBB, 2026 Collegial KPI, 2026-2030 RJPP, and 2026 RAKB	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
37.	October 27, 2025	1. Asset & Liability Committee (ALCO) 2. Marketing Strategy 2026 3. Asset & Liability Committee (ALCO)	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
38.	November 03, 2025	1. Plan for the 2025 BNI Extraordinary General Meeting of Shareholders 2. Subsidiary Committee	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
39.	November 10, 2025	1. General Agenda 2. Discussion of the Results of the 2025/2026 Recovery Action Plan Update 3. Subsidiary Committee	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
40.	November 17, 2025	1. Asset & Liability Committee (ALCO) 2. a.Division/Unit Mapping b. Grha Elevator Modernization 3. Product Committee Update - Wondr Release Update 4. International Project Update	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • On Duty • Present • Present • Present • Present	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
41.	November 24, 2025	1. Technology Management Committee (KMT) 2. Subsidiary IT Synergy 3. 2024-2028 RSTI Update 4. 2026 IT Project Portfolio Proposal 5. 2026 RPTI Proposal	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang*	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
42.	December 01, 2025	1. Review of the Division of Business and Risk Functions for the Board of Directors, SEVP, and SBX/SCX in the Credit Committee 2. Proposed Resolutions of the 2025 Extraordinary GMS 3. General Agenda 4. Updates regarding POJK 24 of 2025 concerning Account Management in Commercial Banks 5. Liquidity Updates 6. Financial Report Updates	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang	• Present • Present • Present • Present • Present • Present • On Leave • On Duty • Present • On Duty • Present • On Duty • Present	BNI Meeting Room
43.	December 8, 2025	1. General Agenda 2. IT Update 3. Payment Update 4. AFR Update	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang	• Present • Present • Present • Present • Present • Present • Present • Present • Present • On Duty • On Duty • Present • Present	BNI Meeting Room
44.	December 22, 2025	1. Human Capital Committee 2. Governance KPI 2026 3. Technology Management Committee (KMT): a. Christmas and New Year Operational Update b. Christmas and New Year IT Operational Update c. Fraud Detection System Improvement Plan 4. Marcom Strategy Update 2026 5. Business Overview and Acceleration 6. Discussion on the Implementation of the Danantara CX 100 Index	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang	• Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present • Present	BNI Meeting Room
45.	December 24, 2025	Liquidity Needs Update	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang	• Present • Present • On Leave • On Leave • Present • Present • Present • Present • Present • Present • Present • Present • On Leave	BNI Meeting Room

No.	Date	Meeting Agenda	Meeting Partcipants	Attendance	Notes
46.	December 29, 2025	General Agenda	· Putrama Wahju Setyawan · Alexandra Askandar · Hussein Paolo Kartadjoemena · Corina Leyla Karnalies · Agung Prabowo · Ronny Venir · David Pirzada · Toto Prasetio · Eko Setyo Nugroho · Muhammad Iqbal · Abu Santosa Sudradjat · Rian Eriana Kaslan · Munadi Herlambang	• Present • Present • Present • On Leave • On Leave • Present • Present • Present • Present • Present • Present • Present • On Leave	BNI Meeting Room

* Not effective yet.

Joint Board of Directors Meeting with the Board of Commissioners

Information regarding the Policy on the Joint Meeting of the Board of Directors and the Board of Commissioners has been disclosed in the section/sub-heading Joint Meeting of the Board of Commissioners and the Board of Directors.

Joint Board of Directors Meetings Scheduled in 2025 [ACGS D.3.1]

As part of the effort to ensure continuous coordination and the effectiveness of strategic decision-making, BNI has prepared a schedule for the Board of Directors Meetings for 2026. This plan was prepared by considering business dynamics, coordination needs among members of the Board of Directors, as well as compliance with the provisions of laws and regulations and the Board of Directors Charter. The following is an overview of the BNI Board of Directors Meeting plan scheduled to be held in 2026:

No.	Month	Meeting Agenda
1	January	1. Proposal for the Appointment of the Chairperson of BNI's 80th Anniversary Committee 2. KDKMP Update 3. Standardization of Outlet Format and Design 4. a. Presentation of the Evaluation Results of 15 Significant Accounts within the ICOFR Scope b. ICOFR Update 5. Discussion of the Review Results of BNI's 2026 Risk Appetite Statement (RAS) 6. Finalization of Unit Performance Evaluation for FY 2025 7. Clearance Meeting for BNI Consolidated Audit for Fiscal Year 2025 8. 2026 Share Buyback Plan 9. Plan for the 2025 Fiscal Year Annual General Meeting of Shareholders (AGMS) of BNI 10. Decision on KRO Booking1 11. Strategy to Accelerate Savings Growth in 2026
2	February	1. Request for Approval of the Review of BNI Financial Conglomeration Integrated Governance Policy 2. 2025 Current Account Growth Strategy 3. Presentation on Optimization and Strengthening of the MBG Program Ecosystem 4. Retail Credit Tools Update 5. Corporate Plan and RBB 6. Business Continuity Management 7. Investor Relations & BBNI Shares 8. MSME Business Review & Strategy
3	March	1. IT Architecture and Digitalization 2. Banking Operations 3. Human Resources Evaluation & Strategy 4. Corporate Banking Business Review & Strategy
4	April	1. Risk Management 2. Internal Control 3. Consumer Business Review & Strategy 4. Evaluation of Lending, Funding, and Service Policies 5. ESG Implementation Evaluation
5	May	1. Capital Injection 2. Subsidiaries Performance Evaluation 3. Integrated Risk Management & Governance 4. Remedial Recovery Evaluation & Strategy
6	June	1. Governance, Risk, and Compliance 2. Review of Anti-Gratuity & Anti-Bribery Policies 3. Evaluation of Branch Network & Service Digitalization 4. Banking Ratios 5. Review of RBB Realization
7	July	1. Performance and Financial Evaluation 2. International Business Performance & Review 3. Treasury Business Review 4. Transformation 5. Big Data Evaluation & Strategy 6. ESG Implementation Evaluation

No.	Month	Meeting Agenda
8	August	1. Bank Capitalization 2. Asset & Liability 3. Review of Corporate Organizational Effectiveness 4. Institutional & Transactional Banking Business Review & Strategy
9	September	1. Bank Revenue Evaluation & Strategy 2. Performance and Financial Evaluation 3. Digitalization & Anti-Cyber Crime Strategy
10	October	1. Human Resources Management Strategy 2. Banking Ratios 3. Bank Products & Services Evaluation
11	November	1. Bank Asset Management 2. Business Innovation 3. Bank Products & Services Evaluation
12	December	1. Performance and Financial Evaluation 2. Target Achievement Evaluation 3. Strategy & Transformation Evaluation 4. BNI Share Performance Evaluation 5. ESG Implementation Evaluation

TRAINING AND/OR COMPETENCY IMPROVEMENT FOR THE BOARD OF DIRECTORS IN 2025

Continuous Training and/or Competency Development Policy [ACGS D.5.2]

As part of the continuous commitment to strengthening leadership capabilities, BNI proactively plans and implements various competency development activities for the Board of Directors, through education, training, seminars, and workshops relevant to the field of duties of each member of the Board of Directors. All BNI Board of Directors' competency development programs are designed not only to enhance technical knowledge but also to broaden strategic perspectives, enabling the Board of Directors to respond appropriately to the challenges and opportunities in the banking industry.

Annually, BNI prepares a plan for the Board of Directors' Competency Development Program based on the latest learning topics relevant to macroeconomic developments, dynamics of the banking industry, market trends, and good Corporate Governance principles. The education and training programs can be organized internally or in collaboration with external parties, provided that the materials provided are in accordance with the competency needs of each member of the Board of Directors. BNI ensures that every program is facilitated by competent instructors from both external and internal parties and is designed comprehensively to support the enhancement of the Board of Directors' capabilities in carrying out their strategic duties.

Training and/or Competency Improvement in Financial Year 2025 [ACGS D.5.2]

In 2025, all members of the BNI Board of Directors participated in various training and competency development activities to strengthen the Bank's supervisory capacity and strategic direction, as follows:

Training and/or Competency Improvement in Financial Year 2025

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
Putrama Wahju Setyawan **President Director**					
1	BNI Business Meeting 2025	January 19-21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	Full Year 2024 Earnings Call	January 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	BRI Microfinance Outlook 2025	January 30, 2025	Tangerang	Workshop	PT Bank Negara Indonesia (Persero) Tbk
4	Focus Group Discussion with the Ministry of Cooperatives, Increasing Business Opportunities for Cooperatives: Innovation & Collaboration	February 6, 2025	Bogor	Training	PT Bank Negara Indonesia (Persero) Tbk
5	Economic Gathering with the President of Indonesia on the Theme of Strengthening National Economic Resilience Amidst the Wave of Trade Tariff Wars	April 8, 2025	Jakarta	Workshop	Ministry of Economic Affairs Secretariat

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
6	Earnings Call and Press Conference FY - 2025	April 28, 25	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
7	Danantara Townhall with KBUMN	April 28, 25	Jakarta	Workshop	Danantara Indonesia
8	BNI Townhall 2025	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
9	Commission XI DPR RI Consultation with Himbara and BSI	July 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
10	Kick Off Danantara Indonesia Human Capital Program	July 25, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
11	Sharing Session BNI and Ministry of Cooperatives	August 4, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
12	Onboarding Retail Productive Credit Risk and Training for Head of Retail Productive Credit Risk and Head of Commercial Credit Risk (HOR)	August 14, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
13	Compliance Forum with KPK	September 16, 25	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
14	Socialization of Housing Credit Program (KPP) with Ministry of PKP	September 26, 25	Tangerang	Workshop	PT Bank Negara Indonesia (Persero) Tbk
15	Implementation of CEO Direction - Implementation of New Region, Area, and Branch Model	October 1, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	Earnings Call 3Q-2025	October 24, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Workshop on the Submission of Strategic Plans for State-Owned Enterprises and Their Subsidiaries	October 24, 2025	Jakarta	Workshop	Danantara Indonesia
18	BNI ESG Sustainability & Transition "BEST" Event	November 19, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
19	OJK Invitation to the Year-End Dialogue between Board of Commissioners Members and the Financial Services Industry in 2025	December 4, 2025	Jakarta	Seminar	Financial Services Authority (OJK)
Alexandra Askandar **Deputy President Director**					
1	FNP Briefing: Market Update and Investor's Point of View	April 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	FNP Briefing: BNI Strategic Planning	April 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	FNP Briefing: BNI Corporate Management	April 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
4	FNP Briefing: International Business and Overseas Offices	April 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
5	FNP Briefing: Prudential Banking	April 29, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
6	Danantara Townhall with KBUMN	April 28, 2025	Jakarta	Workshop	Danantara Indonesia
7	FNP Briefing: Bank Business Environment & Leadership Journey	April 30, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
8	FNP Briefing: Prudential Banking	May 6, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
9	BSMR's SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Training	Risk Management Certification Agency (BSMR)
10	FNP Briefing: Asset Liability Management	May 7, 2025	Jakarta	Workshop	Indonesian Banking Development Institute (LPPI)
11	FNP Briefing: Individual and Integrated Bank Health Levels	May 9, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
12	BRICS Women Business Alliance	May 15-16, 2025	Rusia	Speaker	BRICS
13	BNI 2025 Townhall	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
14	Live streaming of ESG-related Risk Management Forum	June 11, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
15	Public Expose Sustainability Bond	June 12, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
16	Business Mapping Workshop	June 14, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Jakarta Sustainability Investment Forum: Advancing Sustainability for Top 20 Global Cities	July 23, 2025	Jakarta	Workshop	Kearney
18	Earnings Call 1H-2025	July 25, 2025	Jakarta	Conference	PT Bank Negara Indonesia (Persero) Tbk
19	Speakers at the Green Financing Seminar	August 8, 2025	Jakarta	Speaker	Bank Indonesia
20	Sharing Session between BNI and the Ministry of Cooperatives	August 4, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
21	Compliance Forum with the Corruption Eradication Commission (KPK)	September 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
22	Speakers at the Kartini Women Leadership Program	September 25, 2025	Jakarta	Speaker	Danantara Indonesia
23	Implementation of Housing Credit Program (KPP) Socialization with the Ministry of PKP	September 26, 2025	Sutera Hall	Jakarta	Ministry of Housing and Settlement Areas (PKP)
24	Implementation of CEO Direction - Implementation of New Region, Area and Branch Model	October 1, 2025	Grha BNI	Jakarta	PT Bank Negara Indonesia (Persero), Tbk
25	Earnings Call 3Q-2025 via Zoom	October 24, 2025	Grha BNI	Jakarta	PT Bank Negara Indonesia (Persero), Tbk
26	Townhall Serving Wholeheartedly	October 31, 2025	Wisma Danantara	Jakarta	Danantara Indonesia
27	BNI Emerald Market Outlook 2025 Event	December 1, 2025	Hotel Indonesia Kempinski Jakarta	Jakarta	Bursa Efek Indonesia
28	CNBC Financial Forum 2025	December 3, 2025	Main Hall Bursa Efek Indonesia	Jakarta	Consumer News and Business Channel (CNBC)
29	Srikandi BNI Women In Celebration Week 2025	December 18, 2025	Grha BNI	Workshop	PT Bank Negara Indonesia (Persero), Tbk
Hussein Paolo Kartadjoemena **Finance & Strategy Director**					
1	BNI Investor Daily Round Table "Growing Higher in the Face of Domestic Challenges and Global Pressures"	January 15, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
2	Business Meeting 2025	January 20-21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero), Tbk
3	Earning Call and Press Conference FY - 2024	January 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
4	Emtek Connect Vol. 3 Invitation	February 6, 2025	Jakarta	Forum	PT Elang Mahkota Teknologi Tbk (Emtek Group)
5	OJK Invitation: 2025 Financial Services Industry Annual Meeting "Strengthening a Stable and Inclusive Financial Services Sector to Support National Priority Programs	February 11, 2025	Jakarta	Forum	Financial Services Authority (OJK)
6	Reinforcement Core Credit Skill for Executive Leaders	February 12, 2025	Jakarta	Training	PT Bank Negara Indonesia (Persero), Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
7	CNBC Indonesia & Artajasa: Digital Economic Forum	February 25, 2025	Jakarta	Forum	Consumer News and Business Channel (CNBC)
8	CNBC Indonesia: Economic Outlook 2025 "Riding the Wave of 8% Economic Expansion"	February 26, 2025	Jakarta	Forum	Consumer News and Business Channel (CNBC)
9	BNI Investor Daily Round Table "Growing Higher in the Face of Domestic Challenges and Global Pressures"	February 27, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
10	SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Training	Risk Management Certification Agency (BSMR)
11	BNI Townhall 2025	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
12	Pubex Sustainability Bond	June 12, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
13	Issuer Seminar 2025 "Navigating Global Dynamics: The Resilience of Indonesia's Economic and Financial Systems"	July 8, 2025	Jakarta	Seminar	PT Kustodian Sentral Efek Indonesia (KSEI)
14	Joint Consultation with Commission XI of the Indonesian House of Representatives, Himbara, and BSI on the Topic: Credit Distribution	July 22, 2025	Jakarta	Forum	Himpunan Bank Milik Negara (HIMBARA)
15	Earnings Call 1H - 2025	July 25, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
16	BNI & Kemenkop Sharing Session: "Strengthening the People's Economy Based on Mutual Cooperation"	August 4, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
17	Compliance Forum 2025	September 16, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
18	CEO Direction - Implementation of New Region, Area, and Branch Model	October 1, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
19	Observation of BNI's Corporate Governance Perception Index (CGPI) Program for Fiscal Year 2024	October 29, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
20	Speakers at the Board of Commissioners Retreat	November 14, 2025	Labuan Bajo	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
21	16th Kompas100 CEO Forum Powered by PLN with the theme: Navigating Direction & Examining Indonesia's Resilience Strategy Amid Global Turmoil	November 26, 2025	Tangerang	Forum	Perusahaan Listrik Negara (PLN)
22	BNI HC Leaders Talk	December 9, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
Corina Leyla Karnalies **Consumer Banking Director**					
1	Workshop Sektor REB Tahun 2025	January 14–15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
2	BNI Investor Daily Round Table	January 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
3	Business Meeting BNI 2025	January 20–21, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
4	Earnings Call and Press Conference FY - 2024	January 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
5	Business Meeting Wilayah 04	February 7, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
6	BNI Investor Daily Roundtable	February 27, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
7	Earnings Call and Press Conference 1Q - 2025	April 28, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
8	Mastercard Customer Forum 2025	April 29, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
9	SMR JK 07 Maintenance Program from BSMR	May 7, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
10	BNI Townhall 2025	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
11	BOD Teaching BMC 1 Batch 2 2025	June 13, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero), Tbk
12	Asia Pacific VISA Client Forum	June 18–19, 2025	Rusia	Workshop	VISA
13	Commission XI DPR RI Consignment with Himbara and BSI	July 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
14	Earnings Call 1H - 2025	July 25, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
15	Sharing Session BNI & Ministry of Cooperatives: Strengthening the People's Economy Based on Mutual Cooperation	August 4, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
16	FGD on SP Industry Structure Arrangement	September 11, 2025	Jakarta	Workshop	Indonesian Payment Systems Association (ASPI) & Bank Indonesia
17	Compliance Forum 2025	September 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
18	Implementation of Housing Program Credit Socialization (KPP) with the Ministry of PKP	September 26, 2025	Tangerang	Workshop	Ministry of Housing and Settlements (PKP)
19	Implementation of CEO Direction - Implementation of New Region, Area and Branch Model	October 1, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
20	Earnings Call 3Q-2025 via Zoom	October 24, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
21	Townhall Serving Wholeheartedly	October 31, 2025	Jakarta	Forum Group Discussion	Danantara Indonesia
22	18th JCB World Conference 2025	November 5–7, 2025	Seoul	Workshop	JCB
23	Sinarmas Land Customer Gathering Event	November 15, 2025	Tangerang	Workshop	PT Bank Negara Indonesia (Persero), Tbk & Sinarmas Land
24	2025 Indonesian Payment System Association Executive Gathering - The Future of Payments. Innovate, Trusted, Global	November 21, 2025	Bali	Workshop	Indonesian Payment Systems Association (ASPI)
25	BNI Emerald Market Outlook 2025 Event	December 1, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
26	BNI MMS Group Indonesia 2025 Financial Planning and Loyalty Payroll	December 3, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
David Pirzada **Risk Management Director**					
1	BNI Investor Daily Round Table	January 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
2	DPR Economic Outlook "Analyzing the 2025 State Budget to Build Market Confidence"	February 5, 2025	Jakarta	Seminar	House of Representatives of the Republic of Indonesia (DPR RI)
3	Reinforcement Core Credit Skill Learning Program for Executive Leaders	February 12–16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
4	BNI 2025 Business Meeting	January 20–21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero), Tbk
5	BNI ESG Bankers Club: "ESG Trends and Implications for Indonesian Banks"	April 16, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero), Tbk
6	SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Certification	Risk Management Certification Agency (BSMR)

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
7	BNI 2025 Townhall	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
8	Evaluation of the Implementation of Bad Debt Write-offs for MSMEs and Others	May 28, 2025	Jakarta	Sharing Session	Ministry of Micro, Small, and Medium Enterprises of the Republic of Indonesia (UMKM)
9	Chief Risk Officer School Program Mentoring	June 25, 2025	Jakarta	Workshop	BUMN School of Excellence (BSE)
10	House of Representatives Commission VII Working Meeting on the Progress of People's Business Credit (KUR) Distribution to MSMEs	July 1, 2025	Jakarta	Sharing Session	Commission VII of the Indonesian House of Representatives
11	House of Representatives Committee IV Hearing (RDP): Discussion on the Progress of Bad Debt Write-offs for Micro, Small, and Medium Enterprises (MSMEs)	July 2, 2025	Jakarta	Sharing Session	Committee IV of the Indonesian Regional Representative Council
12	Consultation between Commission XI of the Indonesian House of Representatives with HIMBARA and BSI	July 22, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
13	BARa Sharing Session	July 23, 2025	Online	Sharing Session	Bankers Association for Risk Management (BARa)
14	Chief Risk Officer School Program Mentoring	July 30, 2025	Online	Workshop	BUMN School of Excellence (BSE)
15	Chief Risk Officer School Program Graduation	August 7, 2025	Jakarta	Workshop	BUMN School of Excellence (BSE)
16	Hearing Meeting (RDP) of Commission VI of the Indonesian House of Representatives	August 21, 2025	Jakarta	Sharing Session	Commission VI of the Indonesian House of Representatives
17	Discussion on the Development of Bank Credit Distribution and Interest Rates	August 22, 2025	Online	Sharing Session	Financial Services Authority (OJK)
18	Indonesian Ombudsman in the Context of Preventing Maladministration & Fraud in the Banking Sector Public Services	August 26, 2025	Jakarta	Seminar	Ombudsman of the Republic of Indonesia
19	Compliance Forum 2025: "Decision Making Based on the Business Judgment Rule Principle in the Context of Good Corporate Governance and Anti-Corruption"	September 16, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero), Tbk
20	Republika ESG Now Awards 2025	October 16, 2025	Jakarta	Event	Republika
21	BNI ESG & Sustainability Transition (BEST): "Launch of the ESG Advisory Playbook for the Palm Oil Plantation Sector"	November 19, 2025	Jakarta	Event	PT Bank Negara Indonesia (Persero), Tbk
22	Human Capital Leaders Talk: "Human Resource Development Strategies to Build Professionalism, Integrity, and Dedication"	December 9, 2025	Jakarta	Seminar	Danantara Indonesia
Ronny Venir **Operations Director**					
1	Business Meeting W.08	January 3-4, 2025	Bali	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
2	Business Meeting W.05	January 7-8, 2025	Semarang	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
3	Business Meeting W.17	January 7-8, 2025	Yogyakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
4	Business Meeting W.06	January 9-10, 2025	Surabaya	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
5	Business Meeting W.18	January 9-10, 2025	Malang	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
6	Business Meeting BNI 2025	January 20-21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero), Tbk
7	Earnings Call and Press Conference FY - 2024	January 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
8	BNI Pensioners Association National Conference	April 12, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
9	Facilitator of the SESPIBANK Program Batch 80	April 24, 2025	Jakarta	Sharing Session	Indonesian Banking Development Institute (LPPI)
10	Credit Operations Division Workshop	April 25, 2025	Bogor	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
11	UNPAD Alumni Talk Show "Legacy, Leadership, and Impact: The Unpad Legacy in Driving Future Partnerships"	April 30, 2025	Jakarta	Sharing Session	Universitas Padjajaran (UNPAD)
12	BSMR SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Training	Risk Management Certification Agency (BSMR)
13	FKDOP 2024 Annual Report	May 8, 2025	Jakarta	Secretary General (Management)	Operational Directors Communication Forum
14	Operations Sector Workshop	May 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk & KPK
15	External Resource Person for OJK's Tiered Leadership Development Program (PPKB) Level One in 2025	May 16 & 28, 2025	Jakarta	Sharing Session	Financial Services Authority (OJK)
16	BNI Townhall 2025	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Resource Person for BMC1 Program Batch 2 in 2025	June 12, 2025	Jakarta	Resource Person	PT Bank Negara Indonesia (Persero), Tbk & KPK
18	Wondr Fest W17 Anniversary of PT Bank Negara Indonesia (Persero) Tbk	July 19, 2025	Yogyakarta	Resource Person	PT Bank Negara Indonesia (Persero), Tbk & KPK
19	Consultation between Commission XI of the Indonesian House of Representatives, Himbara, and BSI	July 22, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
20	Earnings Call 1H2025	July 25, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
21	PKN_BNI Cross-Generation Reunion	August 6, 2025	Jakarta	Resource Person	PT Bank Negara Indonesia (Persero), Tbk & KPK
22	Providing Guidance and Supervision to the Operations Unit in W04	August 8, 2025	Bandung	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
23	CNBC Talkshow Money Talk segment - Consumer Protection	August 19, 2025	Jakarta	Talkshow	Consumer News and Business Channel (CNBC)
24	Providing Guidance and Supervision to the Operations Unit in W17	September 25, 2025	Yogyakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
25	Focus Group Discussion Indonesia Anti Scam Center	October 22, 2025	Jakarta	FGD	Indonesia Anti-Scam Center (IASC) - Financial Services Authority (OJK)
26	Public Lecture on Digitalization and Financial Education in Banking at the University of Riau	October 24, 2025	Riau	Resource Person	Universitas Riau
27	Providing Guidance and Supervision to the Operations Unit at W02	October 24, 2025	Padang	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
28	Sharing Session Leader Inspiring Hari Pulang Kandang FAPET UNPAD	November 1, 2025	Bandung	Resource Person	Universitas Padjajaran (UNPAD)
29	Providing Guidance and Supervision to the Operations Unit at W06	November 7, 2025	Surabaya	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
30	Kick Off Joint Movement for Consumer Protection (GEBERPK)	November 7, 2025	Jakarta	FGD	Financial Services Authority (OJK)
31	Providing Guidance to the Operations Unit at W17 on the implementation plan for the establishment of RBO W17	November 8, 2025	Yogyakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
32	Consumer Protection Education Seminar - Indonesian Migrant Workers	November 10, 2025	Jakarta	Educational Seminar	Financial Services Authority (OJK)
33	International Customer Experience Award Ceremony - London	November 15, 2025	London	Awarding	International Customer Experience Awards (ICXA)
34	Visit to the Indonesian Embassy in London, KLN London, BNI Debtors	November 16, 2025	London	FGD and Supervision	PT Bank Negara Indonesia (Persero), Tbk & KPK
35	KIP Public Trial - Accessibility for All, BNI Policies and Strategies to Fulfill the Public's Right to Access Public Information	November 19, 2025	Jakarta	Public Test - Resource Person	Central Information Commission (KIP) of the Republic of Indonesia
36	Kick Off Customer Experience 100 (CX100)	November 22, 2025	Jakarta	FGD	Danantara Indonesia
37	Financial Health Event 2025 with OJK and Queen Maxima	November 26, 2025	Jakarta	Educational Seminar	Financial Services Authority (OJK)
38	Provision of Guidance and Supervision of Operations Unit in W08	December 5, 2025	Bali	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
39	Commission XI DPR RI Consignment with Himbara and BSI	December 8, 2025	Jakarta	Sharing Session	PT Bank Mandiri (Persero) Tbk
40	Provision of Guidance and Supervision of Operations Unit at W18	December 11, 2025	Malang	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk & KPK
41	Exit Meeting with the Financial Services Authority (OJK)	December 16, 2025	Jakarta	Exit Meeting	Financial Services Authority (OJK)
42	Exit Meeting with Bank Indonesia (BI)	December 17, 2025	Gedung BI	Exit Meeting	Bank Indonesia (BI)
43	CNBC Talkshow Money Talk segment - BNI's preparedness for disaster conditions and year-end operations	December 31, 2025	Studio CNBC Jakarta	Talkshow	Consumer News and Business Channel (CNBC)
Toto Prasetio **Information Technology Director**					
1	BNI Investor Daily Round Table	January 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
2	Business Meeting BNI 2025	January 20–21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero), Tbk
3	Earnings Call and Press Conference FY - 2024	January 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
4	Sharing Session W06	February 10, 2025	Surabaya	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
5	Safari Ramadhan W01	March 4, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
6	Safari Ramadhan W09	March 11, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
7	Safari Ramadhan W11	March 14, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
8	Update monthly performance review W15	April 16, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
9	Earnings Call 1Q-2025	April 28, 2025	Jakarta	Conference	PT Bank Negara Indonesia (Persero), Tbk
10	Entry Meeting OJK 2025	April 25, 2025	Jakarta	Forum Group Discussion	Financial Services Authority (OJK)
11	BSMR's SMR JK 07 Maintenance Program	May 7, 2025	Bali	Training	Risk Management Certification Agency (BSMR)
12	BNI 2025 Townhall	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
13	W15 Regional Supervision	June 18, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
14	W08 Regional Supervision	June 20, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
15	W15 Gathering with Pertamina Trans Kontinental partners as part of the BNI Anniversary event series	July 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	Visit to Sarinah	July 18, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
17	Earnings Call 2Q - 2025	July 25, 2025	Bandung	Conference	PT Bank Negara Indonesia (Persero) Tbk
18	INFOBANK DIGITAL #growthsummit	August 7, 2025	Jakarta	Conference	Infobank
19	Strengthening Cyber Security System & Electronic Channeling BPD	June 24, 2025	Bali	Conference	Board of Audit (BPK)
20	DMA Workshop	October 17, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
21	ID Banking Leader Forum	October 22, 2025	Karawang	Conference	Google
22	PRIMA Executive Gathering 2025	October 22–24, 2025	Jakarta	Conference	Rintis
23	Earnings Call 3Q-2025	October 24, 2025	Jakarta	Conference	PT Bank Negara Indonesia (Persero) Tbk
24	W15 Visit - Karawang	October 28, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
25	When Security Becomes the Greatest Risk in the Financial Industry	November 20, 2025	Jakarta	Conference	Infobank
26	Digital Trust Insights 2026: Cybersecurity in an Era of Uncertainty	November 25, 2025	Jakarta	Conference	PWC
27	Commission XI DPR Consignment	December 8, 2025	Jakarta	Group Discussion	PT Bank Mandiri (Persero) Tbk
28	BNI HC Leaders Talk	December 9, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
Agung Prabowo **Corporate Banking Director**					
1	BNI Investor Daily Round Table dan Appreciation Night 2024	January 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
2	Business Meeting BNI 2025	January 20–21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	Earnings Call and Press Conference FY - 2024	January 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
4	Thought Leadership Forum Pertamina Group: Indonesia's Oil & Gas Future	February 18, 2025	Jakarta	Workshop	PT Pertamina (Persero)
5	Safari Ramadhan Medan	March 4, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
6	Safari Ramadhan Surabaya	March 7, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
7	Vietnam & Indonesia: a Partnership for Progress & Prosperity	March 10, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
8	BNI Sekuritas Roundtable Discussion: Public housing & internet roadmap	March 19, 2025	Jakarta	Sharing Session	BNI Sekuritas
9	Thought Leadership Forum BNI x Medco	March 20, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk & Medco
10	Goldman Sachs Investor Conference	April 11, 2025	Jakarta	Conference	Golman Sachs
11	Sharing Session MUFG	April 24, 2025	Jakarta	Sharing Session	Mitsubishi UFJ Financial Group (MUFG)
12	Earnings Call 1Q - 2025	April 28, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
13	Grand Business Forum 2025	May 8, 2025	Jakarta	Forum	Grab
14	Unlocking Infrasrtucture Financing: Perspective from International Financial Institutions	May 8, 2025	Bali	Forum	PT Bank Negara Indonesia (Persero), Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
15	Townhall Meeting	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
16	Ceremony PT Indo Raya Tenaga	June 10, 2025	Jakarta	Speaker	PT Indo Raya Tenaga
17	Public Expose	June 12, 2025	Probolinggo	Seminar	PT Bank Negara Indonesia (Persero), Tbk
18	Townhall Meeting Value Chain BNI	July 2, 2025	Singapore	Seminar	PT Bank Negara Indonesia (Persero), Tbk
19	Ceremonial Handover of Dairy Cows	July 15, 2025	Jakarta	Workshop	PT Japfa Comfeed Indonesia Tbk
20	RGE Bankers Forum	July 17, 2025	Jakarta	Forum	Royal Golden Eagle (RGE)
21	Invitation to Commission XI DPR RI Consignment with Himbara & BSI	July 22, 2025	Australia	Forum	Dewan Perwakilan Rakyat Republik Indonesia (DPR RI)
22	Earnings Call 2Q-2025	July 25, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
23	IndOz Conference 2025	August 21, 2025	Jakarta	Forum	Australia-Indonesia Business Council (AIBC) & Consulate General of the Republic of Indonesia (KJRI)
24	DB Indonesia Credit Connect - Panel Session	August 26, 2025	Jakarta	Forum	Deutsche Bank (DB)
25	BNIS Access China & Indonesia Investment Forum	September 23, 2025	Bekasi	Forum	PT Bank Negara Indonesia (Persero), Tbk
26	Indonesia International Sustainability Forum 2025	October 10, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
27	Groundbreaking Ceremony for the Construction of 800 Merah Putih Village/ Sub-District Cooperatives	October 17, 2025	Bali	Forum	Ministry of Micro, Small, and Medium Enterprises of the Republic of Indonesia (UMKM)
28	Earnings Call & Press Conference 3Q-2025	October 24, 2025	Jakarta	Forum	PT Bank Negara Indonesia (Persero), Tbk
29	BNI Customer Gathering 2025	November 14, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
30	BNI ESG Sustainability & Transaction "BEST"	November 19, 2025	Jakarta	ESG	PT Bank Negara Indonesia (Persero), Tbk
31	BNI Emerald Market Outlook 2025	December 1, 2025	Tokyo	Seminar	PT Bank Negara Indonesia (Persero), Tbk
32	BNIdirect Capabilities Event Vol 4	December 2, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero), Tbk
33	Indonesia Day Forum	December 3, 2025	Tokyo, Jepang	Forum	Danantara Indonesia
34	Digital Economy Insight Session & Year End Closing 2025	December 31, 2025	Grha BNI	Workshop	PT Bank Negara Indonesia (Persero), Tbk
Muhammad Iqbal **Commercial Banking Director**					
1	Townhall Meeting	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
2	Workshop Speaker on Business Mapping	June 12, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
3	Earnings Call 1H2025	July 25, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero), Tbk
4	CBDO Executive Program - Global Class Session with INSEAD Business School	August 20, 2025	Singapore	Workshop	Danantara Indonesia
5	Speaker at Regional Economic Development Forum	October 20, 2025	Bali	Workshop	Financial Services Authority (OJK)
6	Earnings Call 3Q-2025	October 24, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
7	Townhall Serving Wholeheartedly	October 31, 2025	Jakarta	Forum Group Discussion	Danantara Indonesia

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
8	Specific Working Visit of Commission XI of the Indonesian House of Representatives for the Second Session of 2025-2026	November 7, 2025	Bandung	Sharing Session	House of Representatives of the Republic of Indonesia (DPR RI)
9	Working Visit of BAKN DPR RI (Management of People's Business Credit to BNI)	December 1, 2025	Batam	Sharing Session	House of Representatives of the Republic of Indonesia (DPR RI)
10	Specific Working Visit of Commission VI of the Indonesian House of Representatives for the Second Session of 2025-2028	December 5, 2025	Bali	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
11	Commission XI DPR RI Consignment	December 8, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
Rian Eriana Kaslan **Network & Retail Funding Director**					
1	BNI Investor Daily Round Table and Appreciation Night 2024	January 15, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
2	BNI Business Meeting 2025	January 20–21, 2025	Bogor	Seminar	PT Bank Negara Indonesia (Persero) Tbk
3	Emtek Connect 2025	February 6, 2025	Jakarta	Seminar	PT Elang Mahkota Teknologi Tbk (Emtek Group)
4	Speaker at the "Women Leaders in Fintech and Banking Roundtable: Shaping the Future of Innovation" event	March 11, 2025	Jakarta	Speaker	Fintech Indonesia
5	Speaker at the Financial Education event in commemoration of Kartini Day 2025	April 21, 2025	Jakarta	Speaker	Financial Services Authority (OJK)
6	Speaker at the National Conference on Increasing the Added Value of Regional Excellence through Synergy in Agricultural Downstreaming, Tourism, and the Creative Economy, Supporting Opportunities for Deepening the Financial Services Market	April 28, 2025	Jakarta	Speaker	Financial Services Authority (OJK)
7	SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Training	Risk Management Certification Agency (BSMR)
8	Panelist at the Grab Business Forum 2025: Beyond Bolder: Navigating Changes, Driving Growth	May 8, 2025	Jakarta	Panelist	Grab
9	Townhall Meeting	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
10	Facilitator at the LPPI event - SESPIBank Program Batch 80 related to Digital Marketing Strategy	May 14, 2025	Jakarta	Facilitator	Indonesian Banking Development Agency (LPPI)
11	BOD teaching the Branch Management Course (BMC1) Batch 2 in 2025	June 13, 2025	Jakarta	Facilitator	PT Bank Negara Indonesia (Persero) Tbk
12	Speaker event Wise Connect Singapore 2025	November 11, 2025	Jakarta	Speaker	Wise
13	BNI HC Leaders Talk	December 9, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero) Tbk
Abu Santosa Sudradjat **Treasury & International Banking Director**					
1	FNP Briefing: Market Update and Investor's Point of View	April 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	FNP Briefing: BNI Strategic Planning	April 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	FNP Briefing: BNI Corporate Management	April 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
4	FNP Briefing: International Business and Overseas Offices	April 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
5	Earnings Call and Press Conference 1Q - 2025	April 28, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
6	FNP Briefing: Prudential Banking	April 29, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
7	FNP Briefing: Bank Business Environment & Leadership Journey	April 30, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
8	FNP Briefing: Prudential Banking	May 6, 2025	Jakarta	Workshop	Indonesian Banking Development Institute (LPPI)
9	FNP Briefing: Asset Liability Management	May 7, 2025	Jakarta	Workshop	Indonesian Banking Development Institute (LPPI)
10	SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Training	Risk Management Certification Agency (BSMR)
11	FNP Briefing: Individual and Integrated Bank Health Levels	May 9, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
12	FNP Briefing: Latest POJK Material Updates	May 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
13	BNI 2025 Townhall	May 23, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
14	FNP Briefing: Overview of Current Accounts & Current Account Growth Strategy	June 3, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
15	FNP Briefing: Consumer Protection and Complaint Handling, APU-PPT and Eradication of Online Gambling	June 4, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
16	FNP Briefing: OJK and BPK Reports and Follow-up on Audit Findings at BNI	June 11, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Business Mapping Workshop	June 13, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
18	Macroprudential Discussion Forum	June 30, 2025	Jakarta	Sharing Session	Bank Indonesia (BI)
19	Business Meeting W.05	July 19-20, 2025	Semarang	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
20	Business Meeting W.16	July 12-13, 2025	Papua	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
21	Commission XI DPR RI Consignment with Himbara and BSI	July 22, 2025	Jakarta	workshop	Bank Indonesia (BI)
22	Earnings Call 1H2025	July 25, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
23	BNIdirect API between PT Sarana Muligriya Finansial and BNI	August 6, 2025	Bandung	workshop	PT Sarana Multigriya Finansial (Persero)
24	JPMorgan Banking Seminar in the UK	August 16-22, 2025	London	workshop	JPMorgan
25	Earnings Call and Press Conference 3Q-2025	October 24, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
26	KLN Singapore Business Meeting	November 6-7, 2025	Singapore	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
27	Introduction to SMF Debt Securities as Underlying Transactions for Bank Indonesia REPO	November 20, 2025	Jakarta	workshop	PT Sarana Multigriya Finansial (Persero)
28	OJK EXIT Meeting	November 27, 2025	Jakarta	workshop	Financial Services Authority (OJK)

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
29	KLN New York Business Meeting	December 1-8, 2025	New York	Workshop	PT Bank Negara Indonesia (Persero) Tbk
30	Consultation between Commission XI of the Indonesian House of Representatives, Himbara, and BSI	December 8, 2025	Jakarta	Sharing Session	PT Bank Mandiri (Persero) Tbk
31	Customer Gathering PSF	December 9, 2025	Jakarta	Speaker	PT Bank Negara Indonesia (Persero) Tbk
32	BNI HC Leaders Talk	December 9, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
33	Business Meeting Div Treasury	December 10, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
Eko Setyo Nugroho **Institutional Director**					
1	Working Visit of Commission XI of the Indonesian House of Representatives	April 11, 2025	Surabaya	Workshop	PT Bank Negara Indonesia (Persero) Tbk
2	FNP Briefing: Market Update and Investor's Point of View	April 15, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
3	FNP Briefing: BNI Strategic Planning	April 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
4	FNP Briefing: BNI Corporate Management	April 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
5	FNP Briefing: International Business and Overseas Offices	April 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
6	Earnings Call and Press Conference 1Q - 2025	April 28, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
7	FNP Briefing: Prudential Banking	April 29, 2025	Jakarta	Workshop	Indonesian Banking Development Institute (LPPI)
8	JK 07 Risk Management Certification Briefing	April 29-30, 2025	Jakarta	Certification	Risk Management Certification Agency (BSMR)
9	FNP Briefing: Bank Business Environment & Leadership Journey	April 30, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
10	JK07 Risk Management Certification	May 2, 2025	Jakarta	Certification	Risk Management Certification Agency (BSMR)
11	FNP Briefing: Prudential Banking	May 6, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
12	FNP Briefing: Asset Liability Management	May 7, 2025	Jakarta	Workshop	Indonesian Banking Development Institute (LPPI)
13	FNP Briefing: Individual and Integrated Bank Health Levels	May 9, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
14	Specific Working Visit of Commission XI of the Indonesian House of Representatives	May 16, 2025	Tangerang	Workshop	House of Representatives of the Republic of Indonesia (DPR RI)
15	Kick-off of Financial Literacy Bulab in Brebes Regency	May 22, 2025	Brebes	Workshop	Financial Services Authority (OJK)
16	Townhall Meeting	May 23, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
17	Working Visit of Commission XI of the Indonesian House of Representatives	May 28-29, 2025	Bali	Workshop	Bank Indonesia
18	FNP Briefing: Overview of Current Accounts & Strategies for Increasing Current Accounts	June 3, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
19	FNP Briefing: Consumer Protection and Complaint Handling, APU-PPT and Eradication of Online Gambling	June 4, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
20	FNP Briefing: Reports and Follow-up on OJK and BPK Findings on Audit Implementation at BNI	June 11, 2025	Online	Workshop	PT Bank Negara Indonesia (Persero) Tbk
21	International Conference on Infrastructure 2025	June 12, 2025	Jakarta	Workshop	Coordinating Ministry for Infrastructure and Regional Development (Kemenko Infrawil),
22	Sharing Session Healthcare Horizon Navigating Opportunities in a Growing Industry	June 17, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
23	BNI Best Employee Bootcamp 2025 - Leadership Session (Theme: The Mentor in Action)	June 17, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
24	Working Visit of Commission VI of the Indonesian House of Representatives	June 22-23, 2025	Palembang	Workshop	State-Owned Enterprise Regulatory Agency (BP BUMN)
25	Consultation between Commission XI of the Indonesian House of Representatives, Himbara, and BSI	July 22, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
26	Earnings Call 1H - 2025	July 25, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
27	Strategic Forum Towards National Energy Independence (Energy Self-Sufficiency: The Future of Indonesia)	July 31, 2025	Jakarta	Workshop	Ministry of Energy and Mineral Resources
28	Sharing Session between BNI & the Ministry of Cooperatives: Strengthening the People's Economy Based on Mutual Cooperation	August 4, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
29	Working Visit of Commission XI of the Indonesian House of Representatives	August 10, 2025	Makassar	Workshop	PT Bank Negara Indonesia (Persero) Tbk
30	Seminar, Business Matching, and Exhibition in the Context of Accelerating Spending on Indonesian-Produced Medical Equipment	August 13, 2025	Semarang	Seminar	Ministry of Health of the Republic of Indonesia
31	Opening of Bank Guarantee Training for INS Employees	August 26, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
32	Economy Mastery Forum 2025 with Dr. Perry Warjiyo, Governor of Bank Indonesia - Unlock Opportunities in Global Economic Changes	August 29, 2025	Jakarta	Workshop	Infobank
33	Implementation of Housing Program Credit (KPP) Socialization with the Ministry of PKP	September 26, 2025	Jakarta	Workshop	Ministry of Housing and Settlement Areas (PKP)
34	Implementation of CEO Direction - Implementation of New Region, Area, and Branch Model	October 1, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
35	Working Visit of Commission VI of the Indonesian House of Representatives	October 2-3, 2025	Makassar	Workshop	PT Bank Negara Indonesia (Persero) Tbk
36	Invitation to Capital Market Stakeholder Dialogue with the Indonesian Minister of Finance	October 9, 2025	Jakarta	Workshop	PT Bursa Efek Indonesia
37	BP Energy Outlook 2025	October 10, 2025	Jakarta	Workshop	British Petroleum
38	Earnings Call 3Q-2025 via Zoom	October 24, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
39	Observation of BNI's Corporate Governance Perception Index (CGPI) for Fiscal Year 2024	October 29, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
40	SP National Working Meeting 2025	November 7, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
41	Speaker at the Focus Group Discussion on "Accelerating a Collaborative KDMP and KNMP Ecosystem"	November 27, 2025	Jakarta	Sharing Session	Office of the Presidential Staff of the Republic of Indonesia
42	BNI Emerald Market Outlook 2025 Event	December 1, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero) Tbk
43	Commission XI of the Indonesian House of Representatives Consultation with Himbara and BSI	December 8, 2025	Jakarta	Sharing Session	PT Bank Mandiri (Persero) Tbk
44	BNI HC Leaders Talk	December 9, 2025	Jakarta	Sharing Session	PT Bank Negara Indonesia (Persero) Tbk
Munadi Herlambang **Human Capital & Compliance Director**					
1	Business Meeting BNI 2025	January 20–21, 2025	Bogor	Workshop	PT Bank Negara Indonesia (Persero), Tbk
2	Focus Group Discussion with the Ministry of Cooperatives, Enhancing Cooperative Business Opportunities: Innovation & Collaboration	February 6, 2025	Bogor	FGD	PT Bank Negara Indonesia (Persero), Tbk
3	Reinforcement Core Credit Skill Learning Program for Executive Leaders	February 12, 14, and 16, 2025	Jakarta	Training	PT Bank Negara Indonesia (Persero), Tbk
4	BSMR's SMR JK 07 Maintenance Program	May 7, 2025	Jakarta	Risk	Risk Management Certification Agency (BSMR)
5	Inauguration of the Bela Negara Campus	June 11, 2025	Bogor	Conference	Universitas Pertahanan RI
6	International Conference on Infrastructure 2025	June 12, 2025	Jakarta	Conference	Coordinating Ministry for Infrastructure and Regional Development
7	BNI Best Employee Excelent 2025	June 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
8	BOD Teaching	June 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
9	Training on Leading Organizational Compliance (Certified Chief Compliance Officer)	June 23–24, 2025	Online	Certification	Mitra Kalyana Sejahtera Job Training Institute (LPK - MKS)
10	Master Class of Compliance	June 23–24, 2025	Online	Training	Center for Risk Management & Sustainability (CRMS) Indonesia
11	Kick-Off Danantara Indonesia Human Capital (HC) Program	July 25, 2025	Jakarta	Workshop	Danantara Indonesia
12	Sharing Session: Strengthening the People's Economy Based on Mutual Cooperation	August 4, 2025	Jakarta	FGD	PT Bank Negara Indonesia (Persero), Tbk & Kementerian Koperasi
13	Speaker: Legal Refreshment	September 12, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
14	Compliance Forum	September 16, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
15	Hearing of Subsidiary Company Management with Danantara	September 19, 2025	Jakarta	FGD	Danantara Indonesia
16	Earning Call 3Q2025	October 24, 2025	Jakarta	Workshop	PT Bank Negara Indonesia (Persero), Tbk
17	Speaker: HMI Youth Service Camp Event	October 27, 2025	Jakarta	Panelist	Islamic Student Association
18	Panelist of BNI Workers Union National Working Meeting	November 7, 2025	Jakarta	Talkshow	PT Bank Negara Indonesia (Persero), Tbk

No	Training/Workshop/ Conference/ Seminar	Date	Venue	Type of Training	Organizer
19	Dissemination of TPPU Committee Strengthening in Preventing and Eradicating Money Laundering Related to Online Gambling	November 27, 2025	Jakarta	Seminar	Financial Transaction Reports and Analysis Center (PPATK)
20	FGD on Issues in Implementing the Personal Data Protection Law in the Financial Services Sector	December 4, 2025	Jakarta	Seminar	Financial Services Authority (OJK)
21	Refreshment: The Role of the Director of Compliance & Governance in Banks	December 4, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
22	Refreshment: Indonesian Banking Regulations	December 5, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
23	Leadership in the 21st Century	December 5–19, 2025	Online	Training	Wharton School
24	Refreshment: Banking Business Processes	December 8, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
25	Refreshment: Prudential Banking	December 9, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
26	Human Capital Executive Forum "The New Growth Engine"	December 9, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero), Tbk
27	BNI HC Leaders Talk	December 9, 2025	Jakarta	Seminar	PT Bank Negara Indonesia (Persero), Tbk
28	Strategic Management: Competitive & Corporate Strategy	December 9-23, 2025	Online	Training	Wharton School
29	Refreshment: Good Corporate Governance	December 10, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
30	Refreshment: Risk Management	December 11, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
31	Refreshment: APU-PPT-PPPSPM	December 12, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
32	Refreshment: Consumer Protection	December 15, 2025	Jakarta	Training	Indonesian Risk Professional Association (IRPA)
33	Leadership Accelerator Essentials: Growing Your Business - Elevating Business Performance Through Market Experience	December 19, 2025	Online	Training	Emritus & BNI Corportate University
34	Leadership Accelerator Essentials: Operational Risk - Protecting the Organization Through Effective Risk Governance	December 22, 2025	Online	Training	Emritus & BNI Corportate University
35	Leadership Accelerator Essentials: Servant Leadership - Inspiring People Through Service & Autenticity	December 23, 2025	Online	Training	Emritus & BNI Corportate University

ORIENTATION AND INDUCTION PROGRAM FOR NEW MEMBER OF THE BOARD OF DIRECTORS [ACGS D.5.1]

New Director Orientation and Introduction Program Policy

Every new member of the Board of Directors is facilitated with an orientation and induction program designed to provide a comprehensive understanding of BNI. This program aligns perceptions and work

standards, and give more insights into the Bank's vision, mission, strategy, and values. The orientation covers relevant technical and governance aspects, which allow new Directors to adapt quickly and do their duties effectively, in line with the Bank's strategic direction and objectives. The program's implementation is regulated in the Board of Directors Charter Document to ensure that every new member of the Board of Directors fully understands their roles, responsibilities, and contributions in supporting the Bank's performance and progress.

Policies regarding the orientation and induction program for new members of the Board of Directors are regulated in the Board of Directors Charter Document. The implementation of this program is intended so that all new members of the Board of Directors can better understand their duties and responsibilities and are able to work in harmony with other Bank Governance organs, in accordance with GCG principles.

Implementation of the Orientation and Induction Program for New Directors in 2025

Throughout 2025, BNI facilitated an orientation and induction program for several newly appointed members of the Board of Directors and transferred directors. The implementation of this activity is intended so that each Director has a comprehensive understanding of the vision, mission, strategy, and corporate governance, so that each individual is expected to carry out their roles and responsibilities effectively. The description of the orientation program implementation is as follows:

Name	Position	Development Program
Putrama Wahju Setyawan	President Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Alexandra Askandar	Vice President Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Hussein Paolo Kartadjoemena	Finance & Strategy Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Corina Leyla Karnalies	Consumer Banking Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
David Pirzada	Risk Management Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Ronny Venir	Operations Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Toto Prasetio	Information Technology Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Agung Prabowo	Corporate Banking Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Munadi Herlambang	Human Capital & Compliance Director	- Development Program related to the Directorship Program - Development Program related to BNI Business - Development Program related to Financial Services Authority (OJK) Regulations
Muhammad Iqbal	Commercial Banking Director	- Development Program related to the Directorship Program - Development Program related to BNI Business

Name	Position	Development Program
Rian Eriana Kaslan	Network & Retail Funding Director	- Development Program related to the Directorship Program - Development Program related to BNI Business
Abu Santosa Sudradjat	Treasury & International Banking Director	- Development Program related to the Directorship Program - Development Program related to BNI Business - Development Program related to Financial Services Authority (OJK) Regulations
Eko Setyo Nugroho	Institutional Banking Director	- Development Program related to the Directorship Program - Development Program related to BNI Business

RISK MANAGEMENT CERTIFICATION

In order to fulfill HR competency in the field of Bank risk management, BNI carries out Risk Management Certification and/or Refreshment programs for the Board of Directors in accordance with POJK No. 24 of 2022 concerning the Development of the Quality of Human Resources for Commercial Banks and OJK Circular No. 28/SEOJK.03/2022 concerning Risk Management Certification for Commercial Bank Human Resources. All serving members of the BNI Board of Directors have Level 5 Risk Management Certification as one of the requirements for taking the fit and proper test conducted by the Financial Services Authority. This demonstrates BNI's commitment to ensuring that the Board of Directors possesses adequate competence and capability to manage risks professionally.

The following is information on the Risk Management Certification held by each member of the BNI Board of Directors that remained valid until the end of 2025:

Name	Position	Qualification Level (JK)	Certifying Institution	Certificate Issuance Date	Expiry Date	Validity Period
Putrama Wahju Setyawan	President Director	7	LSPP	29/04/24	29/04/27	3 years
Alexandra Askandar	Vice President Director	7	LSPP	19/08/24	19/08/27	3 years
Hussein Paolo Katadjoemena	Finance & Strategy Director	7	LSPP	17/04/24	17/04/27	3 years
Corina Leyla Karnalies	Consumer Banking Director	7	LSPP	29/04/24	29/04/27	3 years
David Pirzada	Risk Management Director	7	LSPP	29/04/24	29/04/27	3 years
Ronny Venir	Operations Director	7	LSPP	29/04/24	29/04/27	3 years
Toto Prasetio	Information Technology Director	7	LSPP	29/04/24	29/04/27	3 years
Agung Prabowo	Corporate Banking Director	7	LSPP	17/04/24	17/04/27	3 years
Muhammad Iqbal	Commercial Banking Director	7	BSMR	28/03/24	23/03/27	3 years
Rian Eriana Kaslan	Network & Retail Funding Director	7	LSPP	29/04/24	28/03/27	3 years
Abu Santosa Sudradjat	Treasury & International Banking Director	7	LSPP	18/11/24	18/11/27	3 years
Eko Setyo Nugroho	Institutional Director	7	BSMR	02/05/25	02/05/28	3 years
Munadi Herlambang	Human Capital & Compliance Director	7	BSMR	23/03/24	23/03/27	3 years

BOARD OF DIRECTORS' DUTIES IMPLEMENTATION REPORT IN 2025

Throughout 2025, the BNI Board of Directors discharged its responsibilities with full dedication, consistently adhering to the applicable laws and regulations as well as the Bank's Articles of Association. The following is the report on the implementation of the Board of Directors' duties in general:

1. Preparation of Bank planning including Corporate Plan and RBB/RKAP;
2. Fulfillment of Bank performance targets;
3. Asset and financial management;
4. Organizing Board of Directors Meetings;
5. Attend Board of Commissioners Meetings;
6. Organizing General Meeting of Shareholders;
7. Monitoring and improving internal business processes; and
8. Carrying out other tasks related to Bank management.

A more detailed description of the 2025 Board of Directors' task implementation report can be found in the Board of Directors' Report chapter.

LIST OF BOARD OF DIRECTORS' DECISIONS IN 2025

Throughout 2025, the BNI Board of Directors issued various strategic decisions regarding the management and strategic management of the Bank's business activities, as detailed below:

No.	Subject
1	Board of Directors Meeting Conduct Guidelines (Radisi)
2	Authority to Decide on Credit
3	Temporary Authority to Decide on Credit
4	Investment Committee of Financial Institution Pension Fund (DPLK)
5	Retirement Preparation Period (MPP)
6	Transfer/Change of Position
7	Renewal of the Board of Supervisors and Management of BNI Pension Fund
8	Establishment of BNI Professional Certification Body (LSP BNI)
9	Establishment of Branch Transformation Project Organization
10	Establishment of Division Organization
11	Establishment of Evaluation Team for the Selection of Candidate Directors and Commissioners of BNI Subsidiaries
12	Establishment of BNI Sustainability Report Compilation Team for Fiscal Year 2024
13	Establishment of Task Force Team for POJK 30 Year 2024 Implementation
14	Establishment of Task Force Team for Value Chain Execution
15	Establishment of Government Solution Functional Unit
16	Organizational Arrangement of Asset & Liability Committee (ALCO)
17	Organizational Arrangement of Business Committee (KBI)
18	Organizational Arrangement of Human Capital Committee
19	Organizational Arrangement of Credit Policy Committee (KRB)
20	Organizational Arrangement of Performance Management Committee (PMC)
21	Organizational Arrangement of Risk Management & Anti-Fraud Committee
22	Organizational Arrangement of Integrated Risk Management Committee (KMRT)
23	Organizational Arrangement of Technology Management Committee (KMT)
24	Organizational Arrangement of Subsidiary Company Committee
25	Organizational Arrangement of Division
26	Organizational Arrangement of Transformation Project
27	Determination of Position Grade
28	Determination of Human Capital Management Authority
29	Determination of BNI Professional Certification Body (LSP BNI) Logo

No.	Subject
30	Termination of Employment Relationship
31	Termination of Temporary Replacement (Pgs)
32	Termination of Assignment as BNI Pension Fund Board of Supervisors
33	Termination of BNI Financial Institution Pension Fund (DPLK) Management Appointment
34	Termination of Membership as BNI Pension Fund Board of Supervisors
35	Appointment as Permanent Employee
36	Appointment of BNI Pension Fund Supervisors
37	Appointment as Member of BNI Pension Fund Management
38	Validation of BNI Professional Certification Body Organizational Structure
39	Temporary Replacement (Pgs)
40	Resignation Report
41	Term of Service Award (PMB)
42	Increase of Individual Credit Approval Authority
43	Retirement
44	Financial Institution Pension Fund (DPLK) Assignment
45	Assignment as BNI Financial Institution Pension Fund (DPLK) Management
46	Assignment of Wholesale LMS Team
47	Appointment/Assignment
48	Appointment of Steering Committee of BNI Professional Certification Body (LSP BNI)
49	Appointment of Temporary Replacement
50	Submission of 2025 FHCI Membership Confirmation
51	BNI Financial Institution Pension Fund (DPLK) Regulations
52	Extension of Sharia Supervisory Board (DPS) of BNI Financial Institution Pension Fund (DPLK)
53	Approval of Proposed BNI Financial Institution Pension Fund (DPLK) Regulations
54	Piloting of Regional, Area, and Branch Office Organizational Arrangement
55	Branch Transformation Project - Intelligent Branch
56	New Region, Area, and Branch Market Implementation Project
57	SME Banking Revamp Project
58	Wholesale LMS Implementation Project
59	Correction of Retirement Preparation Period (MPP)
60	BNI 79th Anniversary Committee Decree
61	Decree on Dispensation Permit
62	Power of Attorney
63	Task Force for 2025 POJK Implementation
64	Task Force for Acceleration of SME Banking Credit Tools Development
65	Task Force for Value Chain Execution
66	Project Update: Branch Transformation - Intelligent Branch
67	Proposed Interns for Ministry of SOE (KBUMN) Talent Secondment Period July to December 2025

BOARD OF DIRECTORS' ASSESSMENT OF THE PERFORMANCE OF COMMITTEES UNDER THE BOARD OF DIRECTORS [ACGS D.5.7]

In order to support the effective implementation of the duties and responsibilities of the Board of Directors, BNI has established a number of strategic committees that have been aligned with the characteristics and business needs of the Bank, primarily to support the Board of Directors in the strategic decision-making process, ensure the Bank's compliance with banking regulations or applicable laws, and uphold the implementation of GCG principles. The existence of these committees also contributes to improving the quality of supervision, transparency, and the application of prudential principles in all of the Bank's business activities. The following are the committees under the Board of Directors:

1. Integrated Risk Management Committee (KMRT);
2. Risk Management & Anti-Fraud Committee (KRA);

3. Asset & Liability Committee (ALCO);
4. Business Committee (KBI);
5. Credit Policy Committee (KRB);
6. Human Capital Committee (KHC);
7. Subsidiary Company Committee (KPA);
8. Performance Management Committee (PMC);
9. Technology Management Committee (KMT); and
10. Credit Committee.

All committees under the Board of Directors fulfil; a clear and structured mandate. At least once a year, the Board of Directors evaluates the performance of the committees to ensure the effectiveness of the implementation of their functions and responsibilities with due consideration of various key performance indicators, including the work program target achievement, the level of attendance and participation of members in meetings, and the quality and accuracy of the submission of the duty implementation reports of each committee.

Assessment Procedures Used [ACGS D.5.7]

Throughout 2025, the Board of Directors periodically evaluated the performance of the supporting committees under it in accordance with the applicable assessment criteria. The assessment procedure is carried out by:

1. The assessment is carried out by each permanent member of the Board of Directors and SEVP who are members of the Committee based on the assessment proposal from the Division as secretary of the Committee. The assessment used is the combined value and average value of all assessors.
2. The assessment consists of quantitative and qualitative elements.
3. The final score can be discussed and discussed in a Committee Meeting or Board of Directors Meeting as a form of evaluation and input as well as future direction.
4. The final score will be documented by the Division as Committee secretary and copied to the Corporate Secretary

In assessing the performance of committees under the Board of Directors, BNI has a number of criteria that serve as the basis for the assessment, including at least:

1. The frequency of meetings is compared with the work plan/minimum obligations;
2. Speed of preparation and delivery of minutes of Committee meetings;
3. Percentage of follow-up and speed of follow-up time to Committee meeting decisions;
4. The percentage of member attendance (quorum) and active participation of members in meetings;
5. Banking performance ratios (key ratios) related to the Committee's functions;
6. Member competence; and
7. Agenda and scheduling of strategic issues facing the company (sense of urgency).

In addition to referring to the general criteria above, BNI also has special assessment criteria to assess the performance of each committee, which is tailored to the functions, duties, and responsibilities under its authority.

Party Conducting the Performance Assessment of Board of Directors Committees [ACGS D.5.7]

The performance of the committees under the Board of Directors is appraised by the permanent members of the Board of Directors and SEVPs who are members of the committee, based on proposals from the Division acting as the committee secretary. In summary, the parties involved in the performance assessment process of the committees under the Board of Directors are as follows:

No.	Performance Assessment	Assessment Conducted by

1.	Committee on a Collegial basis	Each member of the Committee for the performance of the Committee
2.	Committee Member on an individual basis	Each Committee member provides an assessment for each other Committee member.
3.	Chairman of the Committee	Each Committee member is related to the performance of their Chairman of the Committee

Each assessor shall submit their assessment objectively, based on data, and on a confidential and anonymous basis. The assessment results are submitted directly through an online survey and subsequently presented to the Nomination and Remuneration Committee for review with the Board of Commissioners at a Board of Commissioners meeting. The results of the discussion will be followed up in the form of improvements or action plans, if necessary. Meanwhile, the final results of the performance evaluation are discussed in a Committee Meeting or Board of Directors Meeting as a basis for evaluation and future direction.

In addition, the performance assessment of all committees under the Board of Directors also involves an independent external party at least once every 3 (three) years.

2025 Committee Performance Assessment Results [ACGS D.5.7]

No.	Supporting Committees under the Board of Directors	Score
1.	Integrated Risk Management Committee (KMRT)	Good
2.	Risk Management & Anti-Fraud Committee (KRA)	Good
3.	Asset & Liability Committee (ALCO)	Good
4.	Business Committee (KBI)	Good
5.	Credit Policy Committee (KRB)	Good
6.	Human Capital Committee (KHC)	Good
7.	Subsidiary Company Committee (KPA)	Good
8.	Performance Management Committee (PMC)	Good
9.	Technology Management Committee (KMT)	Good
10	Credit Committee	Good

Score Range Table

Value Range	Description
80-100	Excellent
60-79	Good
<60	Adequate

Performance Assessment of the Board of Directors and the Board of Commissioners [ACGS D.5.5, D.5.6]

PERFORMANCE ASSESSMENT OF THE BOARD OF DIRECTORS (INCLUDING THE PRESIDENT DIRECTOR)

Procedure for Performance Assessment of the Board of Directors (Including the President Director)

The process of implementing the assessment of the Board of Directors' performance refers to the provisions of the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning the Organs and Human Resources of State-Owned Enterprises, the Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises, and the Letter of the Ministry of State-Owned Enterprises No. S-491/MBU/04/2023 dated September 29, 2023. Based on this, BNI ensures that the process of assessing the Board of Directors' performance is carried out objectively, transparently, and accountably, in line with the principles of GCG.

The performance assessment procedures for the Board of Directors that apply within BNI are carried out with the following mechanisms or provisions:

1. Collegial performance assessment of the Board of Directors is conducted at least twice a year.
2. Individual performance assessment of the Board of Directors, including the President Director, is conducted at least twice a year; and [ACGS D.5.4]
3. Annually, the collegial and individual performance achievements of the Board of Directors are reviewed by a public accounting firm auditing the company's financial statements.

The performance assessment of the Board of Directors, both collegially and individually, is conducted through a self-assessment method which is then reviewed by a Public Accounting Firm (KAP). This assessment is confidential and anonymous, and serves as evaluation material for the continuous improvement of the Board of Directors' performance. Meanwhile, regarding the assessment of individual performance - including the President Director, BNI applies the Balanced Scorecard method which covers 4 (four) perspectives, namely Financial, Customer, Internal Business Process, and Learning and Growth. This approach is designed to align with BNI's strategy and the duties and responsibilities of each member of the Board of Directors, taking into account both collegial and individual aspects, both from a financial and non-financial perspective.

Performance Assessment Criteria For The Board of Directors (Including The President Director)

Management of the Key Performance Indicators (KPI) for the Board of Directors, both collegial and individual, refers to applicable government regulations, strategic initiatives/Management Work Plans (RKM) for the directorate, and the Bank's Business Plan (RBB)/Corporate Work and Budget Plan (RKAP) for the fiscal year. The performance assessment criteria for the Board of Directors (including the President Director) are as follows:

1. Collegial KPI [ACGS D.5.5]
   The Bank uses 5 (five) main perspectives to measure and assess collegial KPI performance:
   a. Economic and social value for Indonesia, covering financial and social aspects.
   b. Business Model Innovation.
   c. Technology Leadership. Governance Framework
   d. Investment Enhancement.
   e. Talent Development

   These five main perspectives are then translated into both financial and non-financial performance targets, which are aligned with the strategic initiatives that have been set by the Bank.

2. Individual KPI [ACGS D.5.6]
   Individual KPIs for the Board of Directors are designed based on the duties, core functions, and responsibilities of each member. The criteria used by BNI to measure the performance of Individual Directors (including the President Director) uses the Balance Scorecard which consists of 4 (four) perspectives as follows:
   a. Financial.
   b. Customer.
   c. Internal Business Process.
   d. Learning & Growth

Parties Conducting The Assessment

The Board of Directors' performance is assessed through a self-assessment mechanism by each Director based on Key Performance Indicators (KPIs) that have been established and agreed upon at the beginning of the year. To maintain objectivity and ensure independent assessment results, BNI also involves an independent external party, namely a Public Accounting Firm (KAP), which conducts an audit of the Bank's financial statements. The audit results serve as one of the bases for assessing the Board of Directors' performance, both collegially and individually, to ensure that performance achievements are in line with the principles of transparency, accountability, and good corporate governance. The results of the review are submitted to the Board of Commissioners through the Nomination and Remuneration Committee and reported to BP BUMN as the Bank's controlling shareholder.

Results of The Board of Directors' Performance Assessment (Including The President Director) In 2025

In 2025, BNI conducted an independent assessment of the Board of Directors' performance by measuring both the collegial KPI of the Board of Directors and the individual KPI of each Director, including the President Director. The assessment results are as follows:

1. Collegial KPI Achievement [ACGS D.5.5]

Perspective	No	KPI	Weight	Unit	Achievement in 2025
Economic and social value for Indonesia (57%)	1	PPOP Consolidation	12%	IDR Trillion	96.2%
	2	Consolidated ROE Tier 1	10%	%	92.2%
	3	Total Shareholder Return (TSR)	8%	Percentile (P)	100.0%
	4	Cost of Credit (CoC)	8%	%	102.8%
	5	Consolidated Cost to Income Ratio (CIR)	7%	%	96.8%
	6	KUR Distribution Realization	7%	%	104.5%
	7	NPS for Bank	5%	%	110.0%
Business Model Innovation (10%)	8	Consolidated CASA Ratio	5%	%	94.6%
	9	Average credit growth in the Corporate and Consumer segments	5%	%	110.0%
Technology Leadership (10%)	10	Number of Active Users of BNI Mobile Banking and wondr	5%	User	110.0%
	11	Cyber Security Breach	5%	Report	110.0%
Increased Investment (15%)	12	Environment, Social, Government (ESG) Rating	5%	Rating	110.0%
	13	Export Financing	5%	IDR Billion	103.2%
	14	Sustainable Financing/Credit	4%	IDR Trillion	100.9%
Talent Development (8%)	15	Human Capital Transformation	8%	%	105.3%
Total Achievements					**101.95%**

2. Achievement Of Individual KPIS [ACGS D.5.6]

Assessment of the individual KPIs of each member of the Board of Directors is carried out based on the achievement of KPI targets in each Directorate, with the following description:

President Director [ACGS D.5.4]

- Achieving the realization of the Business Plan in accordance with RKAP/RBB.
- Ensuring compliance with regulations as a public company.
- Maintaining the bank's soundness level.
- Achieving the implementation and distribution of TJSL.
- Enhancing BNI's brand image.
- Increasing Market Share of Low-Cost Funds
- Improving asset quality.
- Fulfilling internal control implementation at each line of defense.

Deputy President Director
- Achieving the realization of the Business Plan in accordance with RKAP/RBB.
- Improving BNI's brand image.
- Fulfillment of ESG standards in bank operations
- Increasing Market Share of Low-Cost Funds
- Improving asset quality.
- Fulfilling internal control implementation at each line of defense.

Risk Management Director
- Ensuring effective implementation of risk management in accordance with the articles of association, risk management policies, internal control system policies, standard procedures, and external regulations.
- .Attaining of End to End Debtor Monitoring.
- Increasing Low-Cost Fund Market Share
- Maintaining asset quality improvement.
- Fulfilling internal control implementation in each line of defense.

Treasury & International Banking Director
- Increased profitability and business volume for the International channel and Treasury products.
- Increased fee-based income for the International channel and Treasury products.
- Increased transaction volume for International channel and Treasury product customers.
- Achieved Financial Institution Pension Fund (DPLK) business growth.
- Business growth through value chain execution.
- Increased market share of low-cost funds.
- Maintained asset quality for the International channel.
- Fulfilled internal control implementation across all lines of defense.

Commercial Banking Director
- Increased profitability and business volume for the Middle & Small segment
- Increased fee-based income for the Middle & Small segment
- Increased transaction volume for Middle & Small segment customers
- Business growth through value chain execution
- Increased low-cost fund market share
- Maintained asset quality for the Middle & Small segment
- Fulfilled internal control implementation across all lines of defense.

Human Capital & Compliance Director
- Achieving human capital management strategies and targets.
- Improving employee capabilities and productivity.
- Implementing Compliance at BNI Bank.
- Reducing the number of regulatory sanction penalties.
- Fulfilling business procedure and policy needs.
- Increasing Low-Cost Fund Market Share
- Fulfilling internal control implementation in each line of defense.

Consumer Banking Director
- Increased profitability and business volume for the Consumer segment
- Increased fee-based income for the Consumer segment
- Increased transaction volume for Consumer segment customers
- Business growth through value chain execution
- Increased low-cost funds market share
- Maintained asset quality for the Consumer segment
- Fulfilled internal control implementation across all lines of defense.

Finance & Strategy Director
- Achieving the Company's Business Realization in accordance with the Company's Work Plan (RKAP/RBB).
- Achieving the business performance of Subsidiaries.
- Achieving Procurement Process Effectiveness and Asset Optimization
- Increasing Low-Cost Fund Market Share
- Fulfilling the implementation of internal controls at every line of defense.

Operations Director
- Improving Operational Excellence.
- Achieving customer satisfaction and resolving complaints.
- Increasing Low-Cost Fund Market Share
- Ensuring internal control implementation across all lines of defense.

Corporate Banking Director
- Increased profitability and business volume for the Corporate Banking segment
- Increased fee-based income for the Corporate Banking segment.
- Increased transaction volume for Corporate Banking customers
- Business growth through value chain execution

- Increased low-cost funds market share
- Maintained asset quality for the Corporate Banking segment
- Fulfilled internal control implementation across all lines of defense.

Institutional Director
- Increased profitability and business volume for the Institutional Banking segment.
- Increased funding for Institutional Banking.
- Increased transaction volume for Institutional Banking customers.
- Support for government programs.
- Business growth through value chain execution.
- Increased Market Share of Low-Cost Funds.
- Achieved internal control implementation across all lines of defense.

Information Technology Director
- Implementation of effective technology and information governance.
- Completion of Information Technology Projects in accordance with the project charter.
- Increased Low-Cost Funds Market Share
- Fulfillment of internal control implementation at every line of defense.

Network & Retail Funding Director
- Achieved increased profitability and business volume in the Region
- Achieved increased Regional Fee-Based Income
- Increased transaction volume by Retail Banking segment customers
- Business growth through value chain execution
- Increased Low-Cost Funds Market Share
- Maintained Regional Asset Quality
- Fulfilled internal control implementation at every line of defense.

BOARD OF COMMISSIONERS PERFORMANCE ASSESSMENT

The performance assessment of the Board of Commissioners is a crucial element in the implementation of corporate governance, which objectively measures the effectiveness of the oversight and advisory functions of the Board of Directors. This assessment process is based on several indicators, including contribution to the achievement of the Bank's strategic objectives, the quality of strategic direction provided, and compliance with applicable laws and regulations. This performance assessment serves not only as an evaluation instrument but also as a foundation for enhancing the role of the Board of Commissioners in addressing business dynamics and the challenges of the banking industry.

The Board of Commissioners' performance assessment is conducted collectively and reported to shareholders at the Annual General Meeting of Shareholders (GMS) through the presentation of the Board of Commissioners' performance, outlined in the Board of Commissioners' Supervisory Report. Based on this report, the GMS then grants full release and discharge (volledig acquit et de charge) to the Company's Board of Commissioners for their supervisory actions carried out during the fiscal year ending at the end of the fiscal year.

Referring to the Regulation of the Minister of State-Owned Enterprises No. PER-2/MBU/03/2023 dated March 3, 2023 concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises, the Board of Commissioners at the beginning of the year prepares an Annual Work Plan which is an integral part of the Company's Work Plan and Budget (RKAP). As part of the evaluation mechanism, the Board of Commissioners conducts a collegial performance assessment through a self-assessment method. This assessment is intended to measure the effectiveness of the implementation of supervisory duties and providing strategic direction throughout the financial year, as well as serving as a basis for continuous improvement in order to enhance the quality of corporate governance.

Policy and Procedure for the Board of Commissioners' Performance Assessment

The Board of Commissioners' performance is assessed periodically using a self-assessment method twice a year, scheduled every June and December of the current year. This is done as part of an ongoing evaluation mechanism to ensure the effectiveness of the Board of Commissioners' oversight function. The results of the assessment are then reported to Shareholders at the Annual General Meeting of Shareholders as part of an accountability mechanism and to improve the quality of corporate governance.

Board of Commissioners' Performance Assessment Criteria [ACGS D.5.5]

The collegial performance assessment of the Board of Commissioners is conducted by measuring the achievement level of the annual collegial KPIs established at the beginning of the year and approved by the Ministry of State-Owned Enterprises (BP BUMN), as the holder of the Series A Dwiwarna Share. For the 2025 financial year, this performance assessment will take into account several relevant strategic aspects, including:

1. Planning Aspect – Weight: 10%
2. Supervision and Advisory Aspect – Weight: 55%
3. Reporting Aspect – Weight: 17%
4. Dynamic Aspect – Weight: 18%

Parties Conducting the Board of Commissioners' Performance Assessment

The collegial performance assessment of the Board of Commissioners is conducted through a self-assessment process, proposed by the Nomination and Remuneration Committee and approved by the Board of Commissioners. This mechanism is part of the Bank's commitment to ensuring objective and transparent performance evaluation, as well as being the basis for increasing the effectiveness of the supervisory function.

Board of Commissioners' Performance Assessment Results In 2025

The performance of the Board of Commissioners is measured based on several key aspects that reflect the quality and effectiveness of its supervisory function and strategic direction, which significantly impacts the Bank's business continuity. This assessment includes the ability to provide relevant strategic direction, the accuracy of anticipating and managing risks, and the accuracy of ensuring policy alignment with the Bank's vision, mission, and values. The following details the results of the Board of Commissioners' performance assessment for the 2025 financial year:

No.	Aspek dan Parameter	Weight	Achievement
1.	Planning Aspect Conducting discussions and providing recommendations/approval on the preparation of the Board of Commissioners' work plan for the coming year	10.00%	100%
2.	Supervision and Advice Aspect a. Providing approval/response/recommendation to Shareholders on the Bank's Business Plan for the coming year and the Revision of the Bank's Business Plan for the current year, Annual Report, and Quarterly Performance Analysis. b. Providing approval and advice to the Board of Directors according to the Board of Commissioners' field of duty. c. Board of Commissioners Meeting d. Board of Commissioners Committee Meeting with the Board of Directors/Related Units e. Board of Commissioners Working Visit f. Realization of the Board of Commissioners Committee Work Plan	55.00%	104.11%
3.	Reporting Aspect a. Board of Commissioners KPI Realization Report b. Board of Commissioners Supervision Report to the Authorities and the Ministry of State-Owned Enterprises.	17.00%	100%
4.	a. Proposal of External Auditors to Shareholders b. Competency Improvement through Seminars, Workshops, etc. c. GCG Assessment Results	18.00%	103.33%
Total		**100,00%**	**103.35%**

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

PROCEDURE FOR NOMINATION OF MEMBERS OF THE BOARD OF COMMISSIONERS

Nomination Policy for Members of the Board of Commissioners

The Nomination Policy for members of the Board of Commissioners is regulated in the Good Corporate Governance Policy, Company Guidelines No. IN/097/CMP/001 dated August 28, 2024, which has been updated and approved by the Board of Commissioners through BNI Board of Commissioners Letter No. DK/237 dated December 31, 2024, which regulates, among other things, the system and procedures for selecting and/or replacing members of the Board of Commissioners to be submitted to the GMS.

NOMINATION PROCESS FOR BOARD OF COMMISSIONERS MEMBERS

Criteria for Members of the Board of Commissioners

A candidate may be selected and appointed as a member of the BNI Board of Commissioners if they meet the established criteria for Board of Commissioners members, which are as follows:

1. Have good character, morals, and integrity and are capable of carrying out legal actions.
2. Within the last 5 (five) years before appointment and during his/her tenure:
   1) Never declared bankruptcy.
   2) Never been a member of the Board of Directors and/or a member of the Board of Commissioners who was found guilty of causing a company to be declared bankrupt.
   3) Never been convicted of committing a criminal act that is detrimental to state finances and/or related to the financial sector.
   4) Never been a member of the Board of Directors and/or member of the Board of Commissioners during his/her tenure:
      a) Never held an annual GMS;
      b) His/her accountability as a member of the Board of Directors and/or Board of Commissioners has never been accepted by the GMS or has never provided his/her accountability as a member of the Board of Directors and/or member of the Board of Commissioners to the GMS; and
      c) Has ever caused a company that obtained a permit, approval, or registration from the OJK to not fulfill its obligation to submit an annual report and/or financial statement to the OJK, and/or the annual report and/or financial statement was not approved and/or ratified by the GMS.
3. Have a commitment to comply with statutory regulations.
4. Have knowledge and/or expertise in the field required by the Company.
5. Not currently holding a position that has the potential to cause a conflict of interest.
6. Not serving as a member of the Board of Commissioners/Supervisory Board of a SOE or Board of Commissioners of the Subsidiary Company concerned for 2 (two) periods;
7. Not currently holding a position that is prohibited from holding a position as a member of the Board of Commissioners;
8. Physically and mentally healthy, who is not suffering from an illness that could hinder the performance of his/her duties as a member of the Board of Commissioners, as proven by a health certificate from the hospital;
9. Have a Taxpayer Identification Number (NPWP) and have carried out the obligation to pay taxes for the last 2 (two) years;
10. For prospective candidates from technical ministries or other government agencies, they must be based on a letter of proposal from the head of the agency concerned; and
11. Prospective candidates for members of the Board of Commissioners who come from State Administrators must report the State Administrator's Wealth Report (LHKPN) for the last 2 (two) years as proven by proof of the LHKPN report to the authorized institution.
12. Appointment of members of the Board of Commissioners who come from employees or officials in institutions that carry out regulatory and/or supervisory functions of Banks and/or other financial service institutions is carried out after the person concerned has effectively ceased to be an employee or official and has undergone a cooling-off period of at least 6 (six months).

13. Former members of the Board of Directors or Executive Officers or parties who have a relationship with the Bank who may influence the person's ability to act independently must undergo a cooling-off period of at least 1 (one) year before becoming an Independent Commissioner at the Bank concerned.

Procedures for Election, Appointment, Replacement, and Dismissal of Members of the Board of Commissioners

Explained below is the procedures for the selection, appointment, replacement, and dismissal of members of the BNI Board of Commissioners:

1. The selection of candidates for members of the Board of Commissioners is carried out using procedures and mechanisms in accordance with those regulated in SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, which, among other things, regulates provisions for sources, selection and assessment of prospective candidates, as well as proposals for appointment.
2. Banks can use the services of independent and reputable third parties in the selection process for candidates for the Board of Commissioners. In carrying out the nomination process for the BNI Board of Commissioners in 2025, the Nomination and Remuneration Committee did not collaborate with independent professionals.
3. Every proposal for replacement and/or appointment of members of the Board of Commissioners to the GMS must consider the recommendations of the committee that carries out the nomination function.
4. Replacement and/or appointment of members of the Board of Commissioners prioritizes professional composition, independence, and suitability of competence and pays attention to diversity in terms of education (field of study), work experience, age, and expertise, without distinction of ethnicity, religion, and race, which is required in carrying out the duties and responsibilities of the Board of Commissioners. Further explanation regarding the diversity policy of the Board of Commissioners is outlined in this Annual Report on page 827.
5. Members of the Board of Commissioners are appointed and dismissed by a GMS, which must be attended by Series A Dwiwarna Shareholders, and the resolutions of the GMS must be approved by Series A Dwiwarna Shareholders, taking into account the provisions in the Articles of Association.
6. Procedures for appointing members of the Board of Commissioners refer to OJK regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies as well as regulations of the Minister of SOE concerning SOE Organs and Human Resources. Procedures for appointing members of the Board of Commissioners include:
7. Sources of prospective members of the Board of Commissioners come from:
   a. Former SOE Board of Director;
   b. Board of Commissioners/Supervisory Board of SOE;
   c. Structural Officials and Functional Government Officials; or
   d. Other sources.
8. The GMS/Minister can determine candidates proposed by the Nomination and Remuneration Committee at the Ministry of SOE to become members of the Board of Commissioners.
9. Determination of a person as a member of the Board of Commissioners can be done after being declared to have passed the Fit and Proper Test (UKK) in accordance with sectoral provisions.
10. In the event that the appointment of members of the Board of Commissioners is carried out before the UKK is in accordance with sectoral provisions, the actions, duties, and functions as a member of the Board of Commissioners are calculated from the time they are declared to have passed the UKK in accordance with sectoral provisions.
11. Members of the Board of Commissioners, as referred to in point 9, have terms of office that are effective as of the date determined by the GMS/Minister.
12. Curriculum vitae of prospective members of the Board of Commissioners who will be proposed for appointment at the GMS must be available and announced at the time of the GMS before making a decision regarding appointment as members of the Board of Commissioners.
13. The GMS resolution regarding the appointment and dismissal of members of the Board of Commissioners also determines when the appointment and dismissal will take effect. In the event that the GMS does not determine, then the appointment and dismissal of members of the Board of Commissioners shall take effect from the closing of the GMS.
14. Members of the Board of Commissioners are appointed for a period starting from the date determined by the GMS that appointed them and ending at the close of the 5th (fifth) Annual GMS after the date of appointment, provided that the period cannot exceed 5 (five) years, taking into account the regulations and legislation in the fields of Capital Markets and Banking, but without prejudice to the rights of the GMS to dismiss members of the Board of Commissioners at any time before their term of office ends. After their term of office ends, members of the Board of Commissioners can be reappointed by the GMS for one term of office.

15. A member of the Board of Commissioners has the right to resign from his position by notifying the Company in writing of his intention.
16. The Company is obliged to hold a GMS to decide on requests for resignation of members of the Board of Commissioners within a period of no later than 90 (ninety) days after receipt of the letter of resignation.
17. The Company is obliged to disclose information to the public and submit it to the OJK no later than 2 (two) working days after receiving the request for resignation of a member of the Board of Commissioners.
18. Before the resignation becomes effective, the relevant member of the Board of Commissioners is still obliged to complete his duties and responsibilities in accordance with the articles of association and applicable laws and regulations.
19. The term of office of a member of the Board of Commissioners ends if:
    a. His/her resignation is effective.
    b. Deceased.
    c. His/her term of office ends.
    d. Dismissed due to GMS resolution.
    e. Declared bankrupt by the Commercial Court, which has permanent legal force, or placed under guardianship based on a court decision.
    f. No longer meets the requirements as a member of the Board of Commissioners based on the provisions of the Articles of Association and applicable laws and regulations.
    g. Dismissed due to a GMS resolution at any time if a member of the Board of Commissioners:
        1) Unable to carry out his/her duties properly.
        2) Violates the provisions of the articles of association and/or statutory regulations.
        3) Being involved in actions that are detrimental to the Bank and/or the country.
        4) Carrying out actions that violate the ethics and/or propriety that should be respected as a member of the Board of Commissioners.
        5) Declared guilty by a court decision that has permanent legal force.
        6) Resign.

PROCEDURE FOR NOMINATION OF MEMBERS OF THE BOARD OF DIRECTORS

Board of Directors' Member Nomination Policy

Policies related to the nomination of Board members are regulated in the Good Corporate Governance Policy and Company Guidelines No. IN/006/CMP/001 dated January 24, 2025. This policy serves as the basis for a transparent, objective, and accountable nomination process to ensure the quality of leadership at the Board level.

Criteria for Members of the Board of Directors

A candidate may be selected and appointed as a member of the BNI Board of Directors if they meet the established criteria for Board of Directors membership, which are as follows:

1. Have character, morals, expertise, integrity, leadership, experience, honesty, and good behavior and are capable of carrying out legal actions;
2. Domiciled in Indonesia.
3. Within the last 5 (five) years before appointment and during his/her tenure:
    a. Never declared bankruptcy;
    b. Never been a member of the Board of Directors and/or a member of the Board of Commissioners who was found guilty of causing a company to be declared bankrupt;
    c. Never been convicted of committing a criminal offense that is detrimental to state finances and/or related to the financial sector;
    d. Never been a member of the Board of Directors and/or member of the Board of Commissioners who during his/her tenure:
        1) Never held an annual GMS;
        2) His/her accountability as a member of the Board of Directors and/or Board of Commissioners has never been accepted by the GMS or he/she has never provided his/her accountability as a member of the Board of Directors and/or member of the Board of Commissioners to the GMS; and
        3) Has caused a company that has obtained a permit, approval, or registration from the OJK to fail to fulfill its obligation to submit an annual report and/or financial statement to the OJK.
4. Have a commitment to comply with statutory regulations.
5. Have knowledge and/or expertise in the field required by the Company.
6. Not currently holding a position that has the potential to cause a conflict of interest;
7. Not serving as a member of the Board of Directors of the relevant SOE or Subsidiary Company for 2 (two) periods;
8. Not currently holding a position that is prohibited from holding a position as a member of the Board of Directors according to statutory regulations;
9. Have dedication and devote full time to carrying out their duties, as stated in a statement letter from the person concerned;
10. Physically and spiritually healthy, that is, not currently suffering from an illness that could hinder the performance of their duties as a Director, as proven by a health certificate from the hospital; and
11. Have a Taxpayer Identification Number (NPWP) and have carried out the obligation to pay taxes for the last 2 (two) years.

12. Appointment of members of the Board of Directors who come from employees or officials at institutions that carry out regulatory and/ or supervisory functions of Banks and/or other financial service institutions is carried out after the person concerned has effectively ceased to be an employee or official and has undergone a cooling-off period of at least 6 (six) month.

PROCEDURES FOR SELECTION, APPOINTMENT, REPLACEMENT, AND DISMISSAL OF THE BOARD OF DIRECTORS

The following is a description of the procedures for the selection, appointment, replacement, and dismissal of members of the BNI Board of Directors:

1. The selection of prospective members of the Board of Directors is carried out using procedures and mechanisms in accordance with those regulated in the Regulation of the Minister of SOE No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, which, among other things, regulates provisions for sources, selection and assessment of prospective candidates, as well as proposals for appointment.
2. The bank may use the services of an independent third party with a good reputation in the selection process for Board of Directors candidates. In 2025, BNI collaborated with a professional independent consultant, PT Daya Dimensi Indonesia, to carry out the process of identifying and assessing the quality of Board of Directors candidates. The fee for independent consultant services is set at Rp20,165,000 per candidate, as a form of implementing the principles of transparency and good corporate governance.
3. Every proposal for replacement and/or appointment of members of the Board of Directors to the GMS must consider the recommendations of the committee that carries out the nomination function.
4. Replacement and/or appointment of members of the Board of Directors prioritizes professional composition, independence, and suitability of competency and pays attention to diversity in terms of education (field of study), work experience, age, expertise, and representation of women, without distinction of ethnicity, religion, and race, which are needed appropriately in carrying out the duties and responsibilities of the Board of Directors. An explanation of the Board of Directors' Diversity Policy is outlined in this Annual Report on page 827.
5. Members of the Board of Directors are appointed and dismissed by the GMS, where the GMS is attended by Series A Dwiwarna shareholders, and the GMS resolutions must be approved by the Series A Dwiwarna shareholders, taking into account the provisions in the Articles of Association. This provision also applies to GMS held in order to revoke or confirm the decision to temporarily dismiss a member of the Board of Directors.
6. Procedures for appointing members of the Board of Directors refer to OJK regulations concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies as well as regulations of the Minister of SOE concerning SOE Organs and Human Resources.
7. Sources of prospective members of the Board of Directors come from:
   a. Former SOE Board of Director;
   b. Board of Commissioners/Supervisory Board of SOE;
   c. Structural Officials and Functional Government Officials; or
   d. Other sources.
8. The GMS/Minister can appoint candidates proposed by the Nomination and Remuneration Committee at the Ministry of SOE to become members of the Board of Directors.
9. Determination of a person as a member of the Board of Directors can be done after being declared to have passed the Fit and Proper Test (UKK) in accordance with sectoral provisions.
10. In the event that the appointment of members of the Board of Directors is carried out before the UKK is in accordance with sectoral provisions, the actions, duties, and functions as a member of the Board of Directors are calculated from the time they are declared to have passed the UKK in accordance with sectoral provisions.
11. Members of the Board of Directors, as referred to in point 8, have terms of office that are effective as of the date determined by the GMS/Minister.
12. Curriculum vitae of prospective members of the Board of Directors who will be proposed for appointment at the GMS must be available and announced at the time of the GMS before making a decision regarding appointment as a member of the Board of Directors.
13. The GMS resolution regarding the appointment and dismissal of members of the Board of Directors also determines when the appointment and dismissal will take effect. In the event that the GMS does not determine, then the appointment and dismissal of members of the Board of Directors will take effect from the closing of the GMS.
14. Members of the Board of Directors are appointed for a period starting from the closing of the GMS or the date determined by the GMS appointing them and ending at the close of the 5th (fifth) Annual GMS after the date of appointment, provided that the period cannot exceed 5 (five) years, taking into account the laws and regulations in the fields of Capital Markets and Banking, but without prejudice to the rights of the GMS to dismiss

members of the Board of Directors at any time before their term of office ends.
15. Such termination takes effect from the closing of the GMS unless otherwise determined by the GMS.
16. After their term of office ends, members of the Board of Directors can be reappointed by the GMS for one term of office.
17. Members of the Board of Directors may resign from their positions before their term of office ends. In the event that a member of the Board of Directors resigns, the relevant member of the Board of Directors is obliged to submit a written resignation request regarding his/her intentions to the Company.
18. The Company is obliged to hold a GMS to decide on requests for resignation of members of the Board of Directors no later than 90 (ninety) days after receipt of the resignation letter.
19. Members of the Board of Directors who resign as mentioned above can still be held accountable as members of the Board of Directors from the time of their appointment until the date of approval of their resignation at the GMS.
20. The term of office of a member of the Board of Directors ends if:
    a. His/her resignation is effective.
    b. Deceased;
    c. His/her term of office ends;
    d. Declared bankrupt by the Commercial Court, which has permanent legal force, or placed under guardianship based on a court decision;
    e. No longer meets the requirements as a member of the Board of Directors based on the provisions of the Articles of Association and statutory regulations;
    f. Dismissed by resolution of the GMS at any time if a member of the Board of Directors:
        1) Unable to fulfill the obligations agreed upon in the management contract;
        2) Unable to carry out their duties properly;
        3) Violates the provisions of the Articles of Association and/or statutory regulations;
        4) Being involved in actions that are detrimental to the Company and/or the country;
        5) Carrying out actions that violate the ethics and/or propriety that should be respected as the Board of Directors;
        6) Resign;
        7) Other reasons deemed appropriate by the GMS for the interests and objectives of the Company.

The nomination of candidates for the Board of Directors is carried out through a structured and accountable mechanism, involving the Board of Commissioners and the Nomination and Remuneration Committee as the parties responsible for assessing the competence, integrity, and suitability of candidates for the Bank's strategic needs. This process is designed as part of transparent and accountable governance to ensure that all candidates for the Board of Directors meet the formal and material requirements in accordance with laws and regulations and have passed the Fit and Proper Test based on banking regulations and State-owned Enterprise provisions. Subsequently, the official appointment of candidates for the Board of Directors is carried out through a GMS decision. [ACGS (B).D.2.2]

Board of Directors' Succession Policy [ACGS D.5.3]

To ensure leadership continuity in the future, BNI implements a succession policy for the Board of Directors and/or Senior Management that has been aligned with the Regulation of the Minister of State-Owned Enterprises (SOEs) No. PER-2/MBU/03/2023 concerning Guidelines on Governance and Significant Corporate Activities of SOEs, as well as Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of SOEs.

This policy is designed to identify and develop high-potential employees included in the Talent Pool to prepare them for future strategic positions. They are facilitated through various competency development programs covering management, business strategy, strategic planning, analysis of business risks and opportunities, as well as evaluations of operational and financial performance.

In the Board of Directors nomination process, the Board of Commissioners reviews internal candidates who are assessed to have outstanding talent based on the recommendations of the Nomination and Remuneration Committee, while ensuring that the process is transparent, objective, and in accordance with regulations. In 2025, BNI collaborated with a professional independent consultant, PT Daya Dimensi Indonesia, to carry out the process of identifying and assessing the quality of Board of Directors candidates in line with the Company's strategic direction. This collaboration aims to ensure that assessments are conducted comprehensively, objectively, and based on competence. The fee for independent consultant services is set at IDR 20,165,000 per candidate, as a form of implementing the principles of transparency and good corporate governance. [ACGS (B).D.2.2]

PROCEDURES AND IMPLEMENTATION

Remuneration Policy

In determining its remuneration policy, the Bank upholds the principle of prudence and ensures regulatory compliance in both the banking and state-owned enterprise (SOE) sectors. The primary

regulatory references include OJK Regulation No. 45/POJK.03/2015 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks, OJK Circular Letter No. 40/SEOJK.03/2016 as its implementation guideline, Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of SOEs, as well as OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks.

BNI's Remuneration Policy is formulated in a transparent and balanced manner and in accordance with the principles of good corporate governance to support business sustainability and the interests of all stakeholders, as stipulated in the Good Corporate Governance Policy, Company Guideline No. IN/097/CMP/001 dated 28 August 2024, which has been updated and approved by the Board of Commissioners through BNI Board of Commissioners Letter No. DK/237 dated December 31, 2024, which generally regulates matters relating to:

1. The remuneration structure includes at least a remuneration scale based on level and position, as well as remuneration components, and
2. Methods and mechanisms for determining remuneration for the Board of Directors, Board of Commissioners, and Bank employees.

Corporate facilities are provided in accordance with the principles of good corporate governance and are used solely for purposes related to the position held, and must not conflict with prevailing laws and regulations. BNI consistently applies good corporate governance principles in the provision of remuneration by taking into account various aspects, namely:

1. Creating effective risk management;
2. Bank financial stability;
3. Adequacy and strengthening of Bank capital;
4. Short-term and long-term liquidity needs; and
5. Potential income in the future.

REMUNERATION POLICY SCOPE

The Bank provides remuneration to the Board of Directors, the Board of Commissioners, and employees in the form of:

1. Fixed remuneration, namely remuneration that is not linked to performance and risk, including basic salary, facilities, housing allowance, health allowance, education allowance, holiday allowance, and pension. Determination of remuneration must always consider business scale, business complexity, peer group, inflation rate, condition, and financial capacity and does not conflict with applicable laws and regulations.
2. Variable remuneration, namely remuneration that is linked to performance and risk, including bonuses or other equivalent forms. Variable remuneration is carried out to encourage prudent risk taking.

Remuneration Policy Linked to Risk

The Remuneration Policy prepared in the context of creating effective risk management is reflected in:

1. Application of the prudent principle in providing remuneration.
2. The role of the Board of Commissioners in supervising the implementation of remuneration policies.
3. The role of the Board of Commissioners in carrying out regular evaluations of remuneration policies.
4. Risk-linked remuneration policy aims to:
   a. Prevent the emergence of moral hazard and prioritize prudential elements in bank management.
   b. Maintaining the health of the Bank individually.
   c. Mitigating excessive risk taking by decisionmakers.
5. Determination of income in the form of salary or honorarium, allowances, and permanent facilities is carried out by considering risks, business scale factors, business complexity factors, inflation rates, company financial conditions and capabilities, and other relevant factors, and must not conflict with legislation.
6. Variable remuneration in the form of tantiem/performance incentives/Long Term Incentives (LTI), which consider, among other things, risk, performance factors, and the Company's financial capabilities, as well as other relevant factors.
7. Implementation of deferred variable remuneration (Malus) or withdrawing variable remuneration that has been paid (Clawback) to officials classified as Material RiskTakers (MRT), in accordance with the provisions of Article 26 POJK No. 45/POJK.03/2015 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks. Malus and/ or Clawback against MRT is applied in the case of: [ACGS D.3.13]
   a. It is legally proven that there was abuse of position and/or authority and/or committing a criminal act by the recipient of the suspended Tantiem, which resulted in losses for the Company.
   b. Restatement of the Company's financial statement, which is the basis for determining the award of Tantiem.
   c. The risk rating in the last quarter before the implementation of the suspended Tantiem was 4 (Moderate to High) or worse.
   d. The Annual GMS decided to reject the

responsibility of the Board of Directors and/ or the Board of Commissioners for the Company's performance for the financial year as decided at the Annual GMS.

e. Other considerations deemed important by the GMS.

Determination of Material Risk Takers (MRT)

Determination of Material Risk Takers (MRT) is categorized as follows:

1. Material Risk Takers (MRT) can be determined using qualitative methods according to the portion of responsibility that influences the main risk profile, which will be determined in accordance with the risk profile evaluation determined by the Company every year.
2. Determining the MRT category can also be done quantitatively through a comparison of variable remuneration between MRT and nonMRT employees, taking into consideration the performance and risk level of the position concerned.

BNI appointed members of the Board of Commissioners, the Board of Directors, and Senior Executive Vice President (SEVP) as MRT.

Remuneration Linked to Risk and Performance [ACGS C.3.3 (B).B.1.5, (B).B.1.6]

BNI implements a remuneration policy that is fair, competitive, and aligned with the achievement of the Bank's short-term and long-term performance targets. The determination of remuneration is based on the results of Key Performance Indicators (KPIs), while also taking into account the risk profile, compliance, and Good Corporate Governance (GCG) principles. Based on these achievements, the Nomination and Remuneration Committee submits recommendations to the Board of Commissioners, which are subsequently presented to the shareholders through the General Meeting of Shareholders (GMS) for approval.

As part of the application of the prudential principle, BNI also implements a risk-based remuneration system through the designation of Material Risk Takers (MRT) and the application of deferred remuneration schemes. The relevant key risks are reviewed annually in accordance with market conditions, industry developments, and the Bank's financial capacity, ensuring that variable remuneration policies remain aligned with business sustainability. All of these policies are periodically evaluated to ensure their continued relevance to the Bank's needs and the dynamics of the banking industry.

The implementation of Bank remuneration is linked to performance and risks, including:

1. Suspension of variable remuneration with the following conditions:
   a. For parties designated as MRT, part of the variable remuneration will be deferred.
   b. The amount of suspension for MRTs who are members of the Board of Directors and Board of Commissioners is a minimum of 10%.
2. The suspension (malus) or withdrawal (clawback) policy determination applies if the following conditions occur:
   a. It is proven that there is Individual Fraud.
   b. Restatement of the company's financial statement, which is the basis for determining variable remuneration.
   c. The risk rating in the last quarter before the payment of deferred variable remuneration is 4 (Moderate to High) or worse. [ACGS D.3.13, (B).B.1.6]

In addition to paying attention to risk, determining remuneration also pays attention to performance, the implementation of which is carried out through:

1. Determination of increases in remuneration for the Board of Directors, Board of Commissioners, and employees considers the previous year's performance evaluation.
2. Determination of variable remuneration considering the achievement of Key Performance Indicators (KPI) of at least 80%.

Variable Remuneration for the Board of Commissioners, the Board of Directors and Employees

Variable remuneration is remuneration that is linked to performance and risk, which is given in the form of bonuses or other equivalent forms.

1. Form and Reasons for Selecting Variable Remuneration
   Variable compensation determined based on performance achievements, namely as follows:
   a. For the Board of Commissioners and the Board of Directors
      Performance Bonuses for the Board of Commissioners and the Board of Directors constitute variable compensation that is committed by the Company at the beginning of the year. This compensation aims to motivate members of the Board of Directors and the Board of Commissioners, as well as to provide direct rewards for achieving and exceeding individual targets, work unit targets, and overall Company targets.
   b. For Employees
      Bonuses are variable compensation that is not guaranteed by the Company. Bonuses are granted to employees as a form of appreciation for the achievement of the

Company's performance.

2. Reasons for differences in variable remuneration given to employees:
   a. BNI applies the Position Group concept, which consists of Support, Business, and Marketer Advisor. The provision of variable remuneration will differ between job groups, which is adjusted to a constant amount per position group in question.
   b. The Company provides greater variable compensation for marketers due to the following:
      a) Marketers are profit makers.
      b) Encourage marketers to exceed predetermined targets.
      c) Appreciation for marketers.

The factors causing differences in variable compensation are based on considerations of performance and competency achievements, including work unit performance and company performance.

Guaranteed Variable Remuneration without Conditions for Candidates for Board of Commissioners, Candidates for Board of Directors, and/or Candidates for Employees

There is no variable remuneration that is unconditionally guaranteed by BNI to prospective Board of Directors, prospective Board of Commissioners, and/or prospective employees during the first 1 (one) year of employment.

Remuneration Policy Linked to Company Sustainability Performance

Remuneration for the Board of Directors and the Board of Commissioners is determined by considering Environmental, Social, and Governance (LST) aspects. In 2025, the remuneration of the Board of Directors and Board of Commissioners is linked to the achievement of the Board of Directors' KPIs for 2025, which include:

1. ESG Rating, which includes, among others:
   a. Financing environmental impact
   b. Consumer financial protection
   c. Human capital development
   d. Access to finance
   e. Privacy and data security
   f. Corporate governance
   g. Corporate behaviour
2. Social and Environmental Responsibility (TJSL).
3. Averaged diversity in nominated talent (women and young).
4. Realization of Distribution of People's Business Credit (KUR).
5. Sustainability Credit (Green Financing).

Independent Monitoring of Remuneration Policy Implementation

To ensure independence in the implementation of remuneration policies, BNI assigns the Internal Audit function as the main controller that conducts comprehensive supervision of its implementation. In addition, the effectiveness and compliance of remuneration policies are also evaluated independently through audits by external auditors. With this multi-layered control mechanism, BNI ensures that remuneration policies are implemented transparently, accountably, and in accordance with applicable regulations.

Remuneration Policy Review

Management periodically conducts reviews of the employee remuneration and welfare system. The assessment is carried out by considering business scale factors, business complexity factors, inflation rates, company financial conditions and capabilities, and including generally accepted income levels in similar industries.

External Consulting Services and Consultant Duties Related to Remuneration Policy [ACGS (B).D.3.1]

BNI uses independent consultants in the field of remuneration for the Board of Commissioners, Board of Directors, and Employees to determine and adjust remuneration policies in line with market conditions. In 2025, BNI collaborated with Willis Towers Watson Indonesia to obtain objective input and effective recommendations for improving its remuneration policy.

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

The remuneration of the Board of Commissioners and the Board of Directors is determined by the GMS, first through the following procedures:

1. An independent remuneration consultant prepares a study of the structure and nominal remuneration based on market data and considering the provisions of laws and regulations, then submits it to the Nomination and Remuneration Committee (KNR).
2. The results of the independent consultant's study are discussed at the KNR Meeting, and then recommended to the Board of Commissioners.
3. KNR recommendations are discussed at the Board of Commissioners Meeting.
4. Remuneration proposals are submitted by the Board of Commissioners to Series A Dwiwarna Shareholders to be proposed on the GMS agenda.
5. The GMS gives approval to the proposed Remuneration for the Board of Directors and

Board of Commissioners and/or gives authority and power to Series A Dwiwarna Shareholders to determine the remuneration of members of the Board of Commissioners, and approves the granting of authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders to determine the Board of Directors' Remuneration. [ACGS D.3.12]

6. In the event that the GMS gives authority, the Series A Dwiwarna Shareholders determine the Remuneration of the Board of Commissioners and the Board of Directors.
7. By taking into account the GMS resolution, the Board of Commissioners determines the Remuneration for the Board of Directors based on the determination of Remuneration by Series A Dwiwarna Shareholders

Remuneration Policy for the Board of Commissioners and the Board of Director

1. The income of the Board of Directors and the Board of Commissioners is determined by the GMS.
2. Determination of income in the form of salary or honorarium, allowances, and permanent facilities is carried out by considering business scale factors, business complexity factors, inflation rates, company financial conditions and capabilities, and other relevant factors, and must not conflict with statutory regulations.
3. The determination of income in the form of variable tantiem/performance incentives/Long Term Incentives (LTI) (merit rating) is carried out by considering the Company's performance factors and financial capabilities, as well as other relevant factors, including the generally accepted level of income in the similar industry.

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

Based on SOE Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, determining the remuneration of the Board of Commissioners must consider the following indicators:

1. Business scale factor.
2. Business complexity factor.
3. Inflation rate.
4. The Company's financial condition and capabilities; and
5. Other relevant factors, and must not conflict with statutory regulations.

Board of Commissioners Remuneration Structure [ACGS C.3.1, C.3.2]

The determination of remuneration components for members of the Bank's Board of Commissioners refers to the provisions of Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning State-Owned Enterprises' Organs and Human Resources and Circular Letter of PT Danantara Asset Management (Persero) Number SE/002/DI-DAM/DO/2025 dated October 31, 2025 concerning Guidelines on the Conduct and Professionalism of the Board of Directors and Board of Commissioners. The disclosure of the types of remuneration and facilities to which the Bank's Board of Commissioners is entitled is explained as follows:

Remuneration Structure for the Board of Commissioners

Type of Remuneration/ Facility	Description
Honorarium	
Honorarium Composition	• President Commissioner is 45% of the President Director's salary; • Vice President Commissioner at 42.5% of the President Director's salary; • Commissioners amounting to 90% of the President Commissioner's honorarium.
Allowances	
Religious Holiday	The Board of Commissioners is given a holiday allowance of 1 (one) time the honorarium
Post-employment Insurance	• Given during office (from effective appointment until termination); • The premium borne by the Company is 25% (twenty five percent) of salary in one year; • Selection of programs for post-service insurance is determined by the Board of Directors and Board of Commissioners, coordinated by the unit that manages facilities and benefits for members of the Board of Directors and Board of Commissioners; • Premiums, contributions or other relevant terms for post-service insurance include premiums for accident and death insurance.
Transportation	The Board of Commissioners is given a transportation allowance of 20% (twenty percent) of the honorarium
Facilities	

Type of Remuneration/ Facility	Description
Health	• Health facilities are provided in the form of health insurance or reimbursement for medical expenses • Health facilities are provided in the form of: i. Health insurance program administered by the Social Security Administering Agency; ii. Outpatient care and medication; iii. Hospitalization and medication; iv. Medical check-up.
	• Health facilities are provided to members of the Commissioners as well as husband/wife and a maximum of 3 (three) children who have not reached the age of 25 (twenty five) years, provided that the child who is not yet 25 (twenty five) years old has ever been married or If you have ever worked, the person concerned is not entitled to health facilities. • In the event that the treating doctor provides a referral for treatment abroad, health facilities can be provided in full or in part by taking into account the company's financial capabilities. • Medical check-ups are provided with the following conditions: i. medical check-up is given 1 (one) time every year; and ii. medical check-ups are carried out within the country.
Legal Aid	• Legal assistance facilities are provided to members of the Board of Commissioners in the event that actions/deeds occur for and on behalf of the position of members of the Board of Commissioners which are related to the aims and objectives and business activities of the Company. • Legal assistance facilities are provided by taking into account the principles of fairness, transparency and accountability in accordance with applicable regulations, as well as taking into account the Company's financial capabilities. • Legal aid facilities are provided in the form of: i. financing legal services which includes the process of providing information, examining witnesses, suspects and defendants in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; ii. financing legal services as a witness or defendant in legal disputes in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; and iii. transportation and accommodation costs in connection with the legal process. • Legal aid facilities can be charged to the Company only for 1 (one) legal service provider for 1 (one) specific case. • The appointment of legal service providers is carried out by the Company in accordance with the provisions for the procurement of goods and services that apply to the Company. • In the event that a member of the Board of Commissioners uses a legal service provider of their own choice or is involved in the process of appointing a legal service provider, whether at the level of inquiry/ investigation, court of first instance, appeal, cassation or judicial review, the costs of the attorney/legal consultant are not borne/reimbursed by the Company. • In the event that a member of the Board of Commissioners is acquitted/declared not guilty by a court with a decision that has permanent legal force, then the legal aid facilities are at the expense of the Company. • As long as the legal matter does not yet have permanent legal force, the retirement insurance for the Commissioner in question is not paid and is placed in a special account as collateral for the legal costs incurred by the Company. • The Company does not provide legal assistance facilities in the event that members of the Board of Commissioners become witnesses, suspects or defendants due to criminal proceedings or defendants due to proceedings other than criminal cases reported by: i. Company; ii. State, as a legal entity or state institution or government institution; or iii. Certain parties determined by the GMS/Minister; • Commissioners who use legal aid facilities must provide a duly stamped statement explaining the following: i. that the capacity of Commissioners in certain cases is not an individual; ii. willing to use post-service insurance as collateral for legal costs incurred by the Company; iii. willing to return the costs incurred for providing legal aid facilities to the Company if it is proven that the capacity of the member of Commissioners concerned in the case is as an individual; and iv. willing to replace/refund the costs incurred by the company if a member of the Commissioner is found guilty by a court with a decision that has permanent legal force. • The Company must provide legal assistance facilities to former members of the Commissioners in the event of legal problems arising because the person concerned carries out actions/deeds for and on behalf of their position relating to the aims and objectives and business activities of the Company, which they carried out while the person concerned served as a member of the Board of Commissioners. • Provisions regarding the provision of legal aid facilities, mutatis mutandis apply to the provision of legal aid facilities for former Commissioners. • Procedures for legal assistance for members of the Board of Commissioners are carried out in accordance with applicable laws and regulations, in particular the Regulation of the Minister of State for State-Owned Enterprises which regulates Guidelines for Determining the Income of Directors, Board of Commissioners and Supervisory Boards of State-Owned Enterprises.

Total Nominal and Components of Remuneration for the Board of Commissioners [ACGS C.3.1, C.3.2]

Disclosure of remuneration components for the Board of Commissioners is guided by SE OJK No. 40/SEOJK.03/2016 concerning the Implementation of Governance in Providing Remuneration for Commercial Banks and the results of the 2025 Annual GMS resolution, which stipulates that members of the BNI Board of Commissioners are entitled to a certain amount of remuneration consisting of honorarium, transportation allowance, holiday allowance, and other facilities such as health facilities and post-service insurance as detailed below:

No.	Name	Position	Remuneration					Other Facilities in the Form of Nature				(in million IDR) [ACGS D.3.2, D.3.4]
			Honorarium	Holiday Allowance	Housing Allowance	Transportation Allowance	Tantiem	Housing (cannot be owned)	Transportation (cannot be owned)	Post-Service Insurance	Health (cannot be owned)	
January 1 to March 26, 2025 Period												
1	Pradjoto	President Commissioner/ Independent Commissioner	√	√	X	√	X	X	X	√	√	1,083
2	Pahala Nugraha Mansury	Deputy President Commissioner	√	√	X	√	X	X	X	√	√	1,286
3	Sigit Widyawan	Independent Commissioner	√	√	X	√	X	X	X	√	√	1,051
4	Askolani	Commissioner	√	√	X	√	X	X	X	√	√	918
5	Asmawi Syam	Independent Commissioner	√	√	X	√	X	X	X	√	√	1,460
6	Septian Hario Seto	Independent Commissioner	√	√	X	√	X	X	X	√	√	933
7	Iman Sugema	Independent Commissioner	√	√	X	√	X	X	X	√	√	918
8	Erwin Rijanto Slamet	Independent Commissioner	√	√	X	√	X	X	X	√	√	1,684
9	Fadlansyah Lubis	Commissioner	√	√	X	√	X	X	X	√	√	918
10	Robertus Billitea	Commissioner	√	X	X	√	X	X	X	√	√	785
11	Mohammad Yusuf Permana	Commissioner	√	√	X	√	X	X	X	√	√	918
March 26, 2025 to October 8, 2025 Period												
1	Suminto	Commissioner	√	X	X	√	X	X	X	√	√	1,666
March 26, 2025 to December 31, 2025 Period												
1	Omar Sjawwaldy Anwar	President Commissioner/ Independent Commissioner	√	X	X	√	X	X	X	√	√	2,695
2	Tedi Bharata	Deputy President Commissioner	√	X	X	√	X	X	X	√	√	2,522
3	Vera Febyanthy	Independent Commissioner	√	X	X	√	X	X	X	√	√	2,377
4	Didik Junaedi Rachbini	Independent Commissioner	√	X	X	√	X	X	X	√	√	2,397
5	Donny Hutabarat	Commissioner	√	√	X	√	X	X	X	√	√	2,640
December 15, 2025 to December 31, 2025 Period												
1	Febrio Nathan Kacaribu*)	Commissioner	√	√	X	√	X	X	X	√	√	309
Total (in millions of IDR)			**16,045**	**2,266**	**-**	**3,209**	**-**	**-**	**-**	**2,950**	**2,090**	**26,560**

*) In the OJK Fit and Proper Test process

Variable Remuneration for the Board of Commissioners [ACGS C.3.3]

In 2025, the Bank has allocated Tantiem/Performance Incentives for Fiscal Year 2024 to the Board of Commissioners. The Tantiem/Performance Incentives will be distributed to members of the Board of Commissioners using a proportion calculated based on the President Director's bonus, in accordance with applicable regulations, namely: 45% for the President Commissioner, 42.5% for the Vice President Commissioner, and 90% for other Commissioners relative to the Performance Bonus of the President Commissioner.

In order to comply with Article 23 of OJK Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks, the Bank will pay a portion of the total allocated Tantiem/Performance Incentives as Deferred Variable Remuneration.

In accordance with prevailing regulations, the Bank may defer the payment of Deferred Variable Remuneration (malus) or reclaim Variable Remuneration that has already been paid (clawback) to parties designated as Material Risk Takers (MRT) under certain conditions. [ACGS D.3.13]

Board of Directors' Remuneration Structure

[ACGS C.3.1, C.3.2]

The determination of remuneration components for members of the Bank's Board of Directors refers to the provisions of Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning the Organization and Human Resources of State-Owned Enterprises and Circular Letter of PT Danantara Asset Management (Persero) Number SE/002/DI-DAM/DO/2025 dated October 31, 2025 concerning Guidelines on the Conduct and Professionalism of the Board of Directors and Board of Commissioners. The types of remuneration and benefits that BNI directors are entitled to receive are explained in the table below:

Remuneration Structure for Member of the Board of Directors

Type of Remuneration/ Facility	Description
Salary	
Salary Components	• President Director is 100%; • Vice President Director is 90% of the Salary of President Director; • Other Directors is 85% of the salary of the President Director.
Allowances	
Religious Holidays	Members of the Board of Directors are given allowance for Religious Holiday for 1 (one) time salary each year.
Post-Employment Insurance	• Post-employment Insurance, including the insurance program organized by the Employment Social Security Agency, is provided during his/her tenure. • The premium borne by the Company is 25% (twenty-five percent) of salary in one year; • The selection of the program for post-employment insurance is determined by the Board of Directors and the Board of Commissioners coordinated by the unit that manages the facilities and benefits of members of the Board of Directors and the Board of Commissioners; • The provision of premiums, dues or other relevant terms for post-employment insurance includes premiums for accident and life insurance.
Housing Allowance	Members of the Board of Directors are entitled to a housing allowance including utility costs on a monthly basis, the amount of which is determined by the Minister, amounting to IDR27,500,000 per month.
Facilities	
Vehicles	• Members of the Board of Directors are provided with 1 (one) official vehicle and 1 (one) driver which can be used full time by members of the Board of Directors with overtime pay borne by the Company; • Vehicle specifications and types are determined by the Company, with a maximum limit of 3,500 cc for oilfueled vehicles or a maximum limit of 100 kWh for battery electric vehicles. • Maintenance costs and vehicle operational costs as well as other costs arising in connection with official vehicle facilities are borne by the Company at cost (at cost); • Members of the Board of Directors who ceased serving are required to return their official vehicles to the Company within a period of no later than 30 (thirty) days.

Type of Remuneration/ Facility	Description
Health	• Health facilities are given in the forms of health insurance or reimbursement of medical expenses; • Health facilities are provided in the forms of: i. Health insurance program administered by the Social Security Administering Agency; ii. Outpatient and medicine; iii. Inpatient and medicine; iv. Medical check-up, 1 (one) time every year and taken domestically. • Health facilities are provided to members of the Board of Directors as well as husband/wife and a maximum of 3 (three) children who have not yet reached the age of 25 (twenty five) years, provided that the child who is not yet 25 (twenty five) years old has ever been married or have ever worked, the person concerned is not entitled to health facilities. • In the event that the treating doctor provides a referral for treatment abroad, The provision of health facilities can be provided in full or in part by taking into account the company's financial capabilities. i. Medical check-ups are provided with the following conditions: ii. Medical check-up is provided 1 (one) time every year; and iii. Medical check-ups are carried out within the country.
Legal Aid	• Legal assistance facilities are provided to members of the Board of Directors in the event of actions/ deeds for and on behalf of the position of members of the Board of Directors which are related to the aims and objectives and business activities of the Company; • Legal aid facilities are provided by taking into account the principles of fairness, transparency and accountability in accordance with applicable regulations, as well as taking into account the Company's financial capabilities. • Legal aid facilities are provided in the form of: i. financing legal services which includes the process of providing information, examining witnesses, suspects and defendants in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; ii. financing legal services as a witness or defendant in legal disputes in judicial institutions until obtaining a decision that has permanent legal force, and preparation of related documents relating to this process; and iii. transportation and accommodation costs in connection with the legal process. • Legal aid facilities can be charged to the Company only for 1 (one) legal service provider for 1 (one) specific case. • The appointment of legal service providers is carried out by the Company in accordance with the provisions for the procurement of goods and services that apply to the Company. • In the event that a member of the Board of Directors uses a legal service provider of their own choice or is involved in the process of appointing a legal service provider, whether at the level of inquiry/ investigation, court of first instance, appeal, cassation or judicial review, the costs of the attorney/legal consultant are not borne/reimbursed by the Company. • In the event that a member of the Board of Directors is acquitted/declared not guilty by a court with a decision that has permanent legal force, then the legal aid facility is at the expense of the Company. • As long as the legal matter does not yet have permanent legal force, post-service insurance for members of the Board of Directors is not paid and is placed in a special account as collateral for legal costs incurred by the Company. • The Company does not provide legal assistance facilities in the event that members of the Board of Directors become witnesses, suspects or defendants due to criminal proceedings or defendants due to proceedings other than criminal cases reported by: i. Company; ii. The State, as a legal entity or State institution or government institution; or iii. Certain parties determined by the GMS/Minister; • Members of the Board of Directors who use legal aid facilities must provide a stamped statement stating the following: that the capacity of members of the Board of Directors in certain cases is not individual; i. willing to use post-service insurance as collateral for legal costs incurred by the Company; ii. willing to return the costs incurred for providing legal assistance facilities to the Company if it is proven that the capacity of the member of the Board of Directors concerned in the case is an individual; and iii. willing to replace/refund the costs incurred by the company if a member of the Board of Directors is found guilty by a court with a decision that has permanent legal force. • The company must provide legal assistance facilities to former members of the Board of Directors in the event of legal problems arising because the person concerned carries out actions/deeds for and on behalf of their position relating to the aims and objectives and business activities of the Company, which they carried out while the person concerned served as a member of the Board of Directors. • Provisions regarding the provision of legal aid facilities, mutatis mutandis apply to the provision of legal aid facilities for former members of the Board of Directors. • The legal assistance procedures for Directors are carried out in accordance with applicable laws and regulations, in particular the Regulation of the Minister of State for State-Owned Enterprises which regulates Guidelines for Determining the Income of Directors, Board of Commissioners and Supervisory Board of State-Owned Enterprises.

Total Nominal and Remuneration Components of the Board of Directors [ACGS C.3.4]

Disclosure of the remuneration components of the Board of Directors refers to SEOJK No. 40/SEOJK.03/2016 concerning the Implementation of Governance in the Provision of Remuneration for Commercial Banks and is based on the results of the 2025 AGM for the 2024 Financial Year, which stipulates that members of the BNI Board of Directors are entitled to remuneration consisting of a basic salary, transportation allowance, housing allowance, holiday allowance, and other facilities such as health facilities and post-employment insurance. Detailed information regarding the remuneration structure and other facilities received by BNI Board of Directors members in 2025 is as follows:

No.	Name	Position	Remuneration					Other Facilities in the Form of Nature				(in million IDR) [ACGS D.3.2, D.3.4]
			Honorarium	Holiday Allowance	Housing Allowance	Transportation Allowance	Tantiem	Housing (cannot be owned)	Transportation (cannot be owned)	Post-Service Insurance	Health (cannot be owned)	
January 1 to March 26, 2025 Period												
1	Royke Tumilaar	President Director	√	X	√	X	X	X	√	√	√	2,114
2	Putrama Wahju Setyawan	Deputy Presidentr Director	√	√	√	X	X	X	√	√	√	2,184
3	Novita Widya Anggraini	Director	√	√	√	X	X	X	√	√	√	2,023
4	Mucharom	Director	√	√	√	X	X	X	√	√	√	2,066
5	I Made SUkajaya	Director	√	√	√	X	X	X	√	√	√	2,416
Periode 26 Maret sd 31 Desember 2025												
1	Putrama Wahju Setyawan	President Director	√	X	√	X	X	X	√	√	√	6,084
2	Alexandra Askandar	Deputy Presidentr Director	√	X	√	X	X	X	√	√	√	6,420
3	Hussein Paolo Katadjoemena	Finance & Strategy Director	√	√	√	X	X	X	√	√	√	7,246
4	Corina Leyla Karnalies	Consumer Banking Director	√	√	√	X	X	X	√	√	√	7,341
5	David Pirzada	Risk Management Director	√	√	√	X	X	X	√	√	√	7,511
6	Ronny Venir	Operations Director	√	√	√	X	X	X	√	√	√	7,239
7	Toto Prasetio	Information Technology Director	√	√	√	X	X	X	√	√	√	7,415
8	Agung Prabowo	Corporate Banking Director	√	√	√	X	X	X	√	√	√	7,275
9	Muhammad Iqbal	Commercial Banking Director	√	√	√	X	X	X	√	√	√	5,345
10	Rian Eriana Kaslan	Network & Retail Funding Director	√	√	√	X	X	X	√	√	√	5,221
11	Abu Santosa Sudradjat	Treasury & International Banking Director	√	√	√	X	X	X	√	√	√	5,194
12	Eko Setyo Nugroho	Institutional Director	√	√	√	X	X	X	√	√	√	5,299
13	Munadi Herlambang	Human Capital & Compliance Director	√	√	√	X	X	X	√	√	√	7,623
Total (in IDR million)			**61,054**	**4,324**	**4,214**	**-**	**-**	**-**	**12,495**	**11,396**	**2,535**	**96,018**

Variable Remuneration for the Board of Directors

In 2025, the Bank has allocated Tantiem/Performance Incentives for Fiscal Year 2024 to the Board of Directors. The Tantiem/Performance Incentives will be distributed to members of the Board of Directors using a proportion calculated based on the President Director's bonus, in accordance with applicable regulations, namely: 90% for the Vice President Director and 85% for other members of the Board of Directors.

In order to comply with Article 23 of OJK Regulation No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks, the Bank will pay a portion of the total allocated Tantiem/Performance Incentives as Deferred Variable Remuneration.

In accordance with prevailing regulations, the Bank may defer the payment of Deferred Variable Remuneration (malus) or reclaim Variable Remuneration that has already been paid (clawback) from parties designated as Material Risk Takers (MRT) under certain conditions. [ACGS D.3.13]

Stock Options Owned by the Board of Commissioners, the Board of Directors, and Executive Officers

Throughout 2025, no BNI stock options were held by members of the Board of Commissioners, Board of Directors, and Executive Officers.

Total Remuneration of the Board of Commissioners and Board of Directors for 2025

The total remuneration paid to the Board of Commissioners and the Board of Directors for the year ending December 31, 2025, amounted to IDR117,952 million.

Fixed Remuneration	117,952 million
Variable Remuneration	-
Total	**117,952 million**

Allocation of Variable Remuneration for MRT for 1 (One) Year (2025)

Variable remuneration for MRT (Board of Commissioners, Board of Directors, & SEVP) for performance in 2024, to be paid in 2025, is still being formulated by Danantara.

Quantitative Information for Parties in the Material Risk Takers (MRT) Category

BNI designated members of the Board of Commissioners, the Board of Directors, and Senior Executive Vice President (SEVP) as Material Risk Takers (MRT). Quantitative information regarding the total remaining deferred remuneration that is exposed to both implicit and explicit adjustments, the total reduction in remuneration due to explicit adjustments during the reporting period, and the total reduction in remuneration due to implicit adjustments during the reporting period is as follows:

Types of Variable Remuneration	Tah Year 2025 (Performance in 2024)*				Year 2024 (Performance in 2023)				Year 2023 (Performance in 2022)			
	Deferred Remaining	Total Deduction During Reporting Period			Deferred Remaining	Total Deduction During Reporting Period			Deferred Remaining	Total Deduction During Reporting Period		
		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Due to Explicit Adjustment (A)		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Total (A)+(B)		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Total (A)+(B)
Board of Commissioners and Board of Directors												
Cash (IDR million)	-	-	-	-	Rp9,527	-	-	-	Rp1,393	-	-	-

Types of Variable Remuneration	TahYear 2025 (Performance in 2024)*				Year 2024 (Performance in 2023)				Year 2023 (Performance in 2022)			
	Deferred Remaining	Total Deduction During Reporting Period			Deferred Remaining	Total Deduction During Reporting Period			Deferred Remaining	Total Deduction During Reporting Period		
		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Due to Explicit Adjustment (A)		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Total (A)+(B)		Due to Explicit Adjustment (A)	Due to Implicit Adjustment (B)	Total (A)+(B)
Shares/Share-based instruments issued by the Bank (in number of shares and nominal amount of million Rupiah representing the conversion of such shares)	- shares	-	-	-	8,519,298 shares	-	-	8,519,298 shares	1,210,738 shares	-	-	-
SEVP												
Cash (IDR million)	-	-	-	-	-	-	-	-	-	-	-	-
Shares/Share-based instruments issued by the Bank (in number of shares and nominal amount of million Rupiah representing the conversion of such shares)	-	-	-	-	1.854.537 shares	-	-	-	192.660 shares	-	-	-

* Variable remuneration for MRTs in 2025 (Fiscal Year 2024) is still being formulated by Danantara BNI applies a Malus and Clawback policy on variable remuneration given to parties categorized as Material Risk Takers (MRTs). This policy is part of efforts to strengthen risk management by providing the Bank with the opportunity to review and, if necessary, withdraw or defer remuneration payments in the event of violations or certain conditions that trigger the application of Clawback. Throughout the 2024 and 2025 reporting periods, there were no reductions in remuneration as there were no events that met the criteria for applying Clawback to MRT.

Highest and Lowest Salary Ratio

BNI upholds the principle of fairness in its remuneration policy by ensuring competitive and proportional compensation to attract the best talent, as well as maintaining employee loyalty and motivation in the long term. All remuneration policies implemented are in line with applicable laws and regulations, ensuring that their implementation remains within the corridor of good governance. The following is a comparison between the highest and lowest salaries within the Bank:

Subject	2025	2024
Highest and lowest Board of Commissioners salary ratio	1.11:1	1.11:1
Highest and lowest Board of Directors salary ratio	1.18:1	1.18:1
Highest Board of Directors salary ratio and highest employee salary ratio	1.97:1	2.53:1
Highest and lowest employee salary ratio	44.55:1	38.29:1

Total Severance Pay Given and Total Employees Receiving Severance Pay

In 2025, a number of employees were terminated because they have reached retirement age or applied for early retirement at their own request. In this regard, the Bank has paid nominal severance pay in accordance with the applicable statutory provisions with the following description:

No.	Nominal Amount of Severance Pay	Total Employee
1.	> Rp1 billion	162
2.	> Rp500 million - Rp1 billion	288
3.	< Rp500 million	359

Diversity of the Board of Commissioners and the Board of Directors [ACGS (B)E.1.2]

BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS DIVERSITY POLICY

The determination of the composition of the Board of Commissioners and the Board of Directors is a strategic aspect in establishing strong and balanced leadership, while also ensuring a diversity of perspectives in strategic decision making. In this regard, BNI, through the Nomination and Remuneration Committee, carefully reviews and proposes the slate of candidates for members of the Board of Commissioners and the Board of Directors to the GMS. The nomination process takes into account diversity in educational background, experience, expertise, gender, and age range, with the objective of forming a management body that is professional, inclusive, and aligned with the Bank's needs and strategic direction. The formal appointment of members of the Board of Directors and the Board of Commissioners is subsequently carried out by the GMS, while continuing to uphold the principles of diversity and balanced competencies. [ACGS D.4.6]

All mechanisms for proposing candidates and implementing diversity principles within BNI's governing bodies are regulated under the Diversity Policy for the Board of Commissioners and the Board of Directors, which is formulated in accordance with capital market and banking regulations as well as international best practices. This policy is set out in the Good Corporate Governance Policy and Corporate Guidelines IN 001 CMP 001 and IN 005/ CMP/005 dated January 24, 2025. The policy affirms that every appointment and or replacement process for members of the Board of Commissioners and the Board of Directors prioritizes professionalism, independence, and suitability of competencies, while also considering diversity principles covering educational background, work experience, age, expertise, and female representation, without distinction based on ethnicity, religion, or race. In addition, this diversity policy serves as the foundation for the implementation of the succession policy, ensuring the availability of a talent pool aligned with the targeted composition and strategic direction of BNI's governing bodies.

As of December 31, 2025, the composition of BNI's Board of Directors and Board of Commissioners had been structured in accordance with the diversity principles set out in the Company's internal policies. This composition reflects balance across age, gender, educational background, and relevant professional experience.The application of these diversity principles is intended to enrich strategic perspectives, strengthen the effectiveness of decision making, and ensure the consistent implementation of good corporate governance across all levels of the organization.

Diversity in The Composition of Members of the Board of Commissioners

The diversity aspects of the composition of BNI's Board of Commissioners refer to the diversity requirements as stipulated in OJK Circular Letter No. 32/SEOJK.04/2015 on Corporate Governance Guidelines for Issuers or Public Companies and OJK Circular Letter No. 13/SEOJK.03/2017 on the Implementation of Corporate Governance for Commercial Banks, which have been incorporated into the Company's Articles of Association as well as the Good Corporate Governance Policy and Corporate Guidelines No. IN/005/CMP/001 dated January 24, 2025. Based on these provisions, the diversity aspects of BNI's Board of Commissioners are determined as follows:

1. Education/skills/work experience, must have at least:
   a. 1 (one) member who has an educational background/expertise/work experience in the field of economics/business/finance;
   b. 1 (one) member who has educational background/skills/work experience in the banking industry;
   c. 1 (one) member who has an educational background/expertise/work experience in the field of risk management.
2. Gender
   Considering the gender diversity of members of the Board of Commissioners, with at least 1 (one) member of the Board of Commissioners being female.
3. Age
   a. The majority of members of the Board of Commissioners are over 50 years old (experienced and mature).
   b. There are members of the Board of Commissioners aged less than 50 years old (young leader).
4. Independence
   a. At least 50% (fifty percent) of the members of the Board of Commissioners are Independent Commissioners.

b. Former members of the Board of Directors or Executive Officers or parties who have a relationship with the Bank who may influence the person's ability to act independently must undergo a cooling-off period of at least 1 (one) year prior to becoming an Independent Commissioner.

Diversity in The Composition of Board of Directors Members

In line with the Board of Commissioners Diversity Policy, the diversity of the composition of the Board of Directors has been regulated under the Good Corporate Governance Policy and Corporate Guidelines No. IN/001/CMP/001 dated January 24, 2025, with the diversity aspects of the Board of Directors determined as follow:

1. Education/skills/work experience, having at least:
   a. 1 (one) member who has an educational background/expertise/work experience in the field of economics/business/finance;
   b. 1 (one) member who has educational background/skills/work experience in the banking industry;
   c. 1 (one) member who has an educational background/expertise/work experience in the field of risk management.
2. Gender
   Considering the gender diversity of members of the Board of Directors, with at least 1 (one) member of the Board of Directors being female.
3. Age
   a. The majority of members of the Board of Directors are over 50 years old (experienced and mature).
   b. There are members of the Board of Directors aged less than 50 years (young leaders).
4. Independence
   The majority of members of the Board of Directors are parties who are independent of the Bank's controlling shareholders.

ACHIEVEMENTS OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS' COMPOSITION DIVERSITY POLICY [ACGS (B).D.1.2]

The composition of BNI's Board of Commissioners and Board of Directors in 2025 has reflected the implementation of diversity principles in accordance with applicable laws and regulations as well as the Board of Commissioners and Board of Directors Diversity Policy. The implementation of this policy ensures balance across various aspects, including age, gender, educational background, experience, and expertise:

Achievements of Diversity in the Composition of Members of the Board of Commissioners

	Objectives	Achievement
Work Experience [ACGS D.4.6]	Diverse work experience, including: 1. Experience in economics/business: Experience as a Member of Commission XI of the House of Representatives of the Republic of Indonesia, University Rector and Professor of Economics, Head of Department at Bank Indonesia, member of the Board of Directors or Board of Commissioners, or Executive Officer in financial services and banking institutions. 2. Experience in the banking sector: Experience as a member of the Board of Directors or Board of Commissioners, Executive Officer, or senior management position holder in banks or other financial services institutions. 3. Experience in Government: Experience as Deputy Head of the State Owned Enterprises Regulatory Body and Director General at the Ministry of Finance. 4. Experience in the field of Risk Management: All members of the Board of Commissioners hold Banking Risk Management Competency Certification Qualification Level 6. There is a member of the Board of Commissioners with experience serving on the Code of Ethics Board of the Risk Management Certification Body.	√
Independence	There are 3 (three) Independent Commissioners out of a total of 6 (six) members of the Board of Commissioners.	√
Age	The majority of members of the Board of Commissioners are over 50 years of age, with 2 (two) members aged under 50 years.	√

	Objectives	Achievement
Gender	There is 1 (one) female member of the Board of Commissioners out of a total of 6 (six) members. In performing its oversight function, the Board of Commissioners is also supported by Independent Members of the Board Committees consisting of both men and women. Overall, there is 1 (one) woman out of a total of 3 (three) Independent Members of the Board Committees, reflecting BNI's commitment to the implementation of diversity and gender equality principles within the corporate governance structure. Each proposal for the replacement and or appointment of members of the Board of Commissioners takes into account the recommendations of the Nomination and Remuneration Committee, which consistently consider diversity aspects, including gender.	√

Achievements of Diversity in the Composition of the Board of Directors

	Objectives	Achievement
Education	The educational levels of members of the Board of Directors are varied, including Bachelor and Master levels, with various educational fields such as economics and development studies, financial management, business, accounting, risk management, forestry, agriculture, physics, engineering, animal husbandry, and agribusiness.	√
Work Experience	Members of the Board of Directors have a variety of work experiences, namely as members of the Board of Directors and Board of Commissioners of banks, non-bank financial services institutions, and non-financial services companies.	√
Independence	All members of the Board of Directors are independent parties from the controlling shareholders of the Bank and have no affiliation with fellow members of the Board of Directors and Board of Commissioners.	√
Age	The majority of members of the Board of Directors are over 50 years old, and there are 3 (three) members of the Board of Directors who are less than 50 years old.	√
Gender	There are 3 (three) female members of the Board of Directors out of a total of 13 (thirteen) members.	√

Disclosure of Affiliation Relationships Among the Board of Commissioners, Board of Directors, and Controlling Shareholders

BNI consistently upholds the principle of transparency as one of the main pillars in the implementation of Good Corporate Governance (GCG), in line with the provisions of POJK No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks. To ensure information disclosure, BNI always discloses all material information, including management and ownership relationships among members of the Board of Commissioners, Board of Directors, and Controlling Shareholders, in a comprehensive, accurate, timely, and easily accessible manner to the public and regulators. By identifying and openly disclosing any potential affiliated relationships, the Bank proactively manages potential conflicts of inter-est, ensures independent and objective decision-making processes, and strengthens trust and cred-ibility among all stakeholders.

To safeguard the principles of independence and objectivity in the execution of supervisory functions and strategic decision-making, BNI stipulates that each member of the Board of Commissioners and Board of Directors must be free from familial relationships up to the second degree, whether through direct lineage or collateral lineage, including relationships arising from mar-riage. This provision is applied from the nomina-tion and selection process of prospective mem-bers of management and is reviewed periodically to ensure compliance with prevailing regulations and to maintain high GCG standards throughout all levels of the organization.

In this annual report, the Bank transparently discloses information regarding the affiliation relationships of the Board of Commissioners and Board of Directors, including:

1. Affiliation relationships among members of the Board of Directors;
2. Affiliation relationships between members of the Board of Directors and members of the Board of Commissioners;
3. Affiliation relationships between members of the Board of Directors and the Major and/or Controlling Shareholders;
4. Affiliation relationships among members of the Board of Commissioners; and
5. Affiliation relationships between members of the Board of Commissioners and the Major and/or Controlling Shareholders.

The Bank ensures that all members of the Board of Directors and Board of Commissioners do not have any financial relationships, management relationships, share ownership, and/or familial relationships with other members of the Board of Directors, the Board of Commissioners, and/or Controlling Shareholders, or any relationships with the Bank, thereby enabling them to carry out their duties and responsibilities independent-ly.

Board of Commissioners

The transparency of the BNI Board of Commissioners' affiliate relationships can be seen in the table below:

Affiliated Relationships with Other Members of the Board of Commissioners, Members of the Board of Directors, and Controlling Shareholders

Name	Position	Family Relationship up to the Second Degree with						Financial Relationship With						Management Relations with Other Companies	
		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner		√		√		√		√		√		√		√
Tedi Bharata	Vice President Commissioner		√		√		√		√		√		√		√
Vera Febyanthy	Independent Commissioner		√		√		√		√		√		√		√
Didik Junaedi Rachbini	Independent Commissioner		√		√		√		√		√		√		√
Donny Hutabarat	Independent Commissioner		√		√		√		√		√		√		√
Febrio Nathan Kacaribu**)	Commissioner		√		√		√		√		√		√		√

*) Directly or indirectly
**) Can carry out actions, duties, and functions after obtaining approval from the OJK's Fit & Proper Test.

Board of Directors

Disclosure of independence and affiliation of members of the Board of Directors can be seen in the table below:

Affiliated Relationships with Other Members of the Board of Directors, Members of the Board of Commissioners, and Controlling Shareholders

Name	Position	Family Relationship up to the Second Degree with						Financial Relationship With						Management Relations with Other Companies	
		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Putrama Wahju Setyawan	President Director		√		√		√		√		√		√		√
Alexandra Askandar	Deputy President Director		√		√		√		√		√		√		√
Hussein Paolo Kartadjoemena	Finance & Strategy Director		√		√		√		√		√		√		√
Corina Leyla Karnalies	Consumer Banking Director		√		√		√		√		√		√		√
David Pirzada	Risk Management Director		√		√		√		√		√		√		√
Ronny Venir	Operations Director		√		√		√		√		√		√		√
Toto Prasetio	Information & Technology Director		√		√		√		√		√		√		√

Name	Position	Family Relationship up to the Second Degree with						Financial Relationship With						Management Relations with Other Companies	
		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)		Board of Commissioners		Board of Directors		Major and Controlling Shareholders*)			
		Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Agung Prabowo	Corporate Banking Director		√		√		√		√		√		√		√
Muhammad Iqbal	Commercial Banking Director		√		√		√		√		√		√		√
Rian Eriana Kaslan	Network & Retail Funding Director		√		√		√		√		√		√		√
Abu Santosa Sudradjat	Treasury & International Banking Director		√		√		√		√		√		√		√
Eko Setyo Nugroho	Institutional Director		√		√		√		√		√		√		√
Munadi Herlambang	Human Capital and Compliance Director		√		√		√		√		√		√		√

*) Directly or indirectly

Committees under the Board of Commissioners

To enhance the effectiveness of its supervisory and advisory functions for the Board of Directors, the Board of Commissioners is authorized to establish several committees under its oversight, namely the Audit Committee, the Remuneration and Nomination Committee, the Risk Monitoring Committee, and the Integrated Governance Committee. The establishment of these committees has been carried out in compliance with applicable laws and regulations governing publicly listed companies, the banking sector, and State-Owned Enterprises (BUMN). Through these committees, the Board of Commissioners can perform its role more optimally, purposefully, and independently in ensuring transparent, prudent, and highly ethical governance.

AUDIT COMMITTEE [ACGS D.2.18]

The Audit Committee is a supporting committee under the Board of Commissioners that plays a strategic role in supporting the effectiveness of oversight functions and the implementation of GCG principles. Through the performance of its duties, the Audit Committee provides independent views to the Board of Commissioners on the integrity of financial reports, the effectiveness of internal controls, compliance with regulations, and the results of internal and external audits. Thus, the Audit Committee plays an important role in ensuring that the oversight process is transparent, accountable, and in accordance with applicable governance standards.

LEGAL BASIS FOR THE ESTABLISHMENT OF THE AUDIT COMMITTEE

The legal basis for the establishment of BNI's Audit Committee refers to the following regulations:

1. Financial Services Authority (OJK) Regulation No. 55/POJK.04/2015 concerning the Establishment and Implementation Guidelines for the Audit Committee;
2. Financial Services Authority (OJK) Regulation No. 1/POJK.03/2019 concerning the Implementation of the Internal Audit Function in Commercial Banks;
3. Financial Services Authority (OJK) Regulation No. 9 of 2023 concerning the Use of Public Accountants and Public Accounting Firms in Financial Services Activities;
4. Financial Services Authority (OJK) Regulation No. 17 of 202 concerning the Implementation of Governance for Commercial Banks;
5. Financial Services Authority (OJK) Regulation No. 15 of 2024 concerning the Integrity of Financial Reporting;
6. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-2/MBU/03/2023 concerning Governance Guidelines and Significant Corporate Activities for State-Owned Enterprises;
7. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises; and
8. Board of Commissioners' Decree No. KEP/05/DK/2000 dated July 28, 2000, concerning the Establishment of the Audit Committee.

AUDIT COMMITTEE CHARTER [ACGS D.2.21]

The functions and responsibilities of the BNI Audit Committee are comprehensively outlined in the Audit Committee Charter, which was ratified through Board of Commissioners Decree No. KEP/025/DK/2025 dated September 19, 2025, concerning the Audit Committee Charter and Code of Ethics of PT Bank Negara Indonesia (Persero) Tbk. This charter serves as the main reference in the implementation of the Audit Committee's duties, while also reinforcing BNI's commitment to the principles of accountability and transparency. Through this document, the Audit Committee has clear guidelines in carrying out its supervisory functions so that it can assist the Board of Commissioners in ensuring the Bank's compliance with applicable regulations, as well as maintaining the integrity of the financial reporting process and the effectiveness of the Bank's internal control system.

The BNI Audit Committee Charter regulates several matters, including:

1. Legal basis;
2. Organizational structure and membership of the Audit Committee;
3. Membership requirements of the Audit Committee;

4. Duties and responsibilities of the Audit Committee;
5. Term of office of the Audit Committee;
6. Authority of the Audit Committee;
7. Audit Committee meetings; and
8. Reporting.

Taking into account business developments, the complexity of business activities, and changes in applicable regulations, the BNI Audit Committee Charter is evaluated and updated periodically to ensure that it remains relevant and in line with current governance requirements. The latest update was implemented on September 19, 2025, and has been published on BNI's official website (https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/KA-Piagam-Komite-Audit-Tahun-2025.pdf). This step was taken as part of the Bank's commitment to transparency and openness of information to all stakeholders.

DUTIES AND RESPONSIBILITIES OF THE AUDIT COMMITTEE

The duties and responsibilities of the Audit Committee as stipulated in the Audit Committee Charter are as follows:

1. Reviewing financial information to be disclosed by the Bank to the public and/or regulatory authorities, including financial statements, projections, and other reports related to the Bank's financial information.
2. Monitoring and evaluating the implementation of internal control policies and procedures in the Bank's financial reporting process.
3. Monitoring and evaluating the compliance of the Financial Statements with Indonesian Financial Accounting Standards (SAK) and OJK regulations regarding the recording of financial transactions.
4. Reviewing compliance with laws and regulations related to the Company's business activities.
5. Providing independent opinions on:
   i. Differences of opinion between management and the Accountant regarding the services provided; and/or
   ii. Non-compliance of audit implementation by the Public Accounting Firm with applicable auditing standards.
6. Providing recommendations to the Board of Commissioners regarding the appointment of the Public Accountant and Public Accounting Firm to be submitted to the General Meeting of Shareholders (GMS) as regulated by the authorities.
   The Audit Committee must ensure that the report on the appointment of the Public Accountant and/or Public Accounting Firm for the audit of the Company's annual historical financial information reported to the OJK, no later than 10 working days after such appointment, is accompanied by the Audit Committee's recommendation and the considerations used in issuing the recommendation;
7. Providing recommendations to the Board of Commissioners based on evaluation results regarding the appointment, reappointment, dismissal, or replacement of the Public Accountant and/or Public Accounting Firm that will audit the financial statements, based on independence, scope of assignment, and audit fees. [ACGS D.2.24]
8. Evaluating the implementation of audit services on annual historical financial information by the Public Accountant and/or Public Accounting Firm, at a minimum through:
   i. Compliance of the audit implementation with applicable auditing standards;
   ii. Adequacy of fieldwork duration;
   iii. Review of the scope of services provided and adequacy of sampling; and
   iv. Recommendations for improvements provided by the Public Accountant and/or Public Accounting Firm.
   The Audit Committee must ensure that the evaluation report on the implementation of audit services on annual historical financial information by the Public Accountant and/or Public Accounting Firm is reported by the Company to the Financial Services Authority annually no later than six months after the end of the financial year, and to the SOE Regulatory Body no later than one month after the Public Accounting Firm completes its work.
9. Reviewing the implementation of examinations conducted by internal auditors and external auditors, and overseeing the follow-up actions taken by the Board of Directors on audit findings, in order to provide recommendations to the Board of Commissioners.
10. Reviewing complaints related to the Company's accounting and financial reporting processes.
11. Conducting examinations of alleged errors in decisions of the Board of Directors' Meetings or deviations in the implementation of such decisions. These examinations may be conducted by the Audit Committee or independent parties proposed by the Audit Committee and approved by the Board of Commissioners at the Company's expense.
12. Reviewing and providing advice to the Board of Commissioners regarding potential conflicts of interest involving the Company.
13. Providing recommendations to the Board of Commissioners regarding the appointment and dismissal of the Head of the Internal Audit Division (IAD), and ensuring that reports on such appointment or dismissal, signed by the President Director and the President Commissioner, are

submitted to the Financial Services Authority no later than 10 (ten) working days after the date of appointment or dismissal.

14. Providing recommendations to the Board of Commissioners regarding the establishment of the Internal Audit Charter. The Audit Committee must ensure that the Internal Audit Charter is reviewed at least once every three years.
15. In carrying out the internal audit function, the Audit Committee is responsible for:
    i. Monitoring and reviewing the effectiveness of the Bank's internal audit implementation;
    ii. Evaluating the performance of the IAD;
    iii. Ensuring that the IAD communicates with the Board of Directors, the Board of Commissioners, external auditors, and the Financial Services Authority;
    iv. Ensuring that the IAD operates independently;
    v. Providing recommendations to the Board of Commissioners regarding the preparation and determination of the audit plan, scope, and budget of the IAD;
    vi. Reviewing audit reports and ensuring that the Board of Directors takes prompt corrective actions to address control weaknesses, fraud, non-compliance with policies, laws, and regulations, or other issues identified and reported by the IAD;
    vii. Providing recommendations to the Board of Commissioners regarding the overall annual remuneration of the IAD and performance incentives; and
    viii. Ensuring that the IAD upholds integrity in the performance of its duties.
16. Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan pengendali mutu independen dari pihak ekstern untuk melakukan kaji ulang terhadap kinerja IAD. Komite Audit wajib memastikan bahwa laporan hasil kaji ulang pihak ekstern yang independen yang ditandatangani oleh Direktur Utama dan Komisaris Utama disampaikan kepada Otoritas Jasa Keuangan paling lambat 2 (dua) bulan setelah periode pengkajian berakhir;
16. Providing recommendations to the Board of Commissioners regarding the appointment of an independent external quality assurance reviewer to conduct a review of the IAD's performance. The Audit Committee must ensure that the report on the results of the independent external review, signed by the President Director and the President Commissioner, is submitted to the Financial Services Authority no later than 2 (two) months after the end of the review period.
17. Ensuring that a special report on any internal audit findings that are expected to endanger the Bank's business continuity, signed by the President Director and the Chair of the Audit Committee, is submitted to the Financial Services Authority no later than three working days after the findings are identified.
18. Ensuring that reports on the implementation of the main results of internal audits, signed by the President Director and the Chair of the Audit Committee, are submitted to the Financial Services Authority on a semi-annual basis no later than:
    i. July 31 of the current year for the first semester; and
    ii. January 31 of the following year for the second semester.
19. Providing recommendations to the Board of Commissioners regarding the appointment of a Rating Agency to conduct the Bank Soundness Level Assessment.
20. Maintaining the confidentiality of the Company's documents, data, and information.
21. Performing duties related to risk management as stipulated in prevailing laws and regulations.
22. Coordinating with other committees under the Board of Commissioners to avoid overlapping duties and to enhance cooperation in carrying out tasks.

AUDIT COMMITTEE CODE OF ETHICS

In carrying out its duties and responsibilities, the Audit Committee always adheres to the Audit Committee Code of Ethics, which serves as a reference for professional conduct in performing its supervisory functions and providing recommendations to the Board of Commissioners. This code of ethics regulates standards of integrity, independence, objectivity, and confidentiality of information, so that all members of the Audit Committee can carry out their roles ethically, transparently, and in accordance with the principles of good corporate governance.

The scope of the Audit Committee Code of Ethics covers the following matters:

1. Integrity
   Audit Committee members are committed to consistently aligning thoughts, words, and actions with fundamental ethical principles. In executing their duties, they must:
   i. Act honestly, diligently, and responsibly;
   ii. Comply with legal regulations and make disclosures in accordance with legal and professional standards;
   iii. Uphold professionalism and encourage others to act professionally;
   iv. Respect and support BNI's established Vision and Mission;
   v. Refrain from engaging in illegal activities or actions that could undermine the credibility of the Audit Committee; and
   vi. Avoid intentional misrepresentation or manipulation in carrying out their assigned duties and responsibilities.

2. Objectivity and Independence
   Audit Committee members provide fair and balanced assessments based on relevant conditions without being influenced by personal or external interests. In carrying out their duties, Audit Committee Members must:
   i. Maintain impartiality and prioritize stakeholders' interests above personal interests;
   ii. Disclose all material facts that, if withheld, could obscure the accuracy of reports;
   iii. Declare any relationships that could affect their judgment and create conflicts of interest; and
   iv. Not accept anything that could compromise or influence professional judgment.
3. Competence
   Audit Committee members utilize their knowledge, skills, and experience to fulfill their duties, responsibilities, and authority. They must:
   i. Carry out the duties, responsibilities and authority given in accordance with the competencies possessed;
   ii. Maintain and improve knowledge and skills continuously.
4. Confidentiality
   Audit Committee members safeguard confidential Bank information and uphold professional secrecy in accordance with the Bank's policies and applicable regulations. In carrying out their duties, Audit Committee Members must:
   i. Exercise prudence in using and protecting information obtained in their role; and
   ii. Not use confidential information for personal or external interests unless legally or professionally required.

AUTHORITY OF THE AUDIT COMMITTEE

The BNI Audit Committee has the authorities to:
1. Accessing corporate documents, data, and information on employees, funds, assets, and resources, including all Bank activities;
2. Communicating directly with employees, including the Board of Directors, as well as internal audit, risk management, and external auditors regarding their responsibilities;
3. Engaging independent external parties as needed to support its tasks (if necessary); and
4. Exercising other authorities granted by the Board of Commissioners.

APPOINTMENT, DISMISSAL, AND TERM OF OFFICE OF AUDIT COMMITTEE MEMBERS

In accordance with POJK No. 17 of 2023 and the BNI Audit Committee Charter, the term of office of Audit Committee members appointed in the middle of a management period shall end concurrently with the term of office of the Board of Commissioners that appointed them, and shall not exceed the term of office of the said Board of Commissioners. Audit Committee members may be reappointed for one subsequent term. Meanwhile, Audit Committee members from independent parties may serve for a maximum period of 3 (three) years and may be extended once for an additional 2 (two) years, resulting in a maximum total term of 5 (five) years. These provisions do not reduce the authority of the Board of Commissioners to dismiss Audit Committee members at any time prior to the end of their term, if deemed necessary based on performance evaluations or other considerations.

In practice, if a member of the Board of Commissioners serving as Chairperson of the Audit Committee resigns before the end of their term as Commissioner, the position of Chairperson of the Audit Committee shall be assumed by another Independent Commissioner. Furthermore, the Chairperson and members of the Audit Committee are appointed and dismissed by the Board of Commissioners. Every appointment and dismissal of Audit Committee members must be reported to the GMS/the Head of the State-Owned Enterprises Supervisory Body and submitted to the Financial Services Authority (OJK) no later than 2 (two) working days after the appointment or dismissal decision is made. The President Commissioner is not permitted to concurrently serve as Chairperson of the Audit Committee, except under extraordinary circumstances, which must be accompanied by a written explanation in the Annual Report.

STRUCTURE, MEMBERSHIP, AND EXPERTISE OF THE AUDIT COMMITTEE

The composition of the BNI Audit Committee has been structured in accordance with applicable laws and regulations as well as the BNI Audit Committee Charter, thereby ensuring the fulfillment of the principles of independence, competence, and professionalism in the performance of its duties. The composition of the BNI Audit Committee is as follows:

1. The Audit Committee is established by and accountable to the Board of Commissioners;
2. Members of the Audit Committee are appointed and dismissed by the Board of Commissioners;
3. The Audit Committee shall consist of at least:
   a. 1 (one) Independent Commissioner serving concurrently as Chairperson;
   b. 1 (one) Independent Party with expertise in finance or accounting, who is assessed as meeting the following criteria:
      1) Possesses a competency certificate in the field of finance and/or accounting issued by recognized domestic or international institutions; and
      2) Has a minimum of 5 (five) years of working experience in the field of finance and/or accounting.
   c. 1 (one) Independent Party with expertise in law or banking, who is assessed as meeting the following criteria:
      1) Possesses a competency certificate in:
         a) The legal field, including but not limited to legal auditor, notary, and/or contract specialist; and/or
         b) The banking field, including but not limited to risk management as applicable to the Board of Commissioners, compliance, public accountant, accountant, general banking, wealth management, strategic planning, information technology, treasury, banking-related audit, corporate finance, payment systems and rupiah currency management, consumer protection, and capital market aspects, issued by recognized domestic or international institutions; and
      2) Has a minimum of 5 (five) years of working experience in the field of law and/or banking.
4. All members of the Audit Committee must be independent (Independent Commissioners and Independent Parties);
5. An Independent Party is a party outside the Bank who has no financial, management, ownership, and/or family relationship with members of the Board of Directors, members of the Board of Commissioners, and/or controlling shareholders, including ultimate shareholders (PSPT), or any relationship with the Bank that may affect the ability to act independently;
6. The Audit Committee is chaired by an Independent Commissioner who also serves as a member;
7. The Chairperson of the Audit Committee may concurrently serve as chairperson of no more than 1 (one) other committee;
8. The Board of Commissioners is required to conduct an evaluation of the committee's performance at least at the end of each financial year.

NUMBER, STRUCTURE, AND COMPOSITION OF AUDIT COMMITTEE MEMBERSHIP

As of December 31, 2025, the BNI Audit Committee consisted of 5 (five) members, comprising 3 (three) Independent Commissioners—one of whom served as the Chairperson of the Committee—and 2 (two) Independent Parties appointed pursuant to Board of Commissioners' Decrees No. KEP/010/DK/2025 dated September 2, 2025, No. KEP/034/DK/2025 dated December 18, 2025, and No. KEP/036/DK/2025 dated December 18, 2025. This membership structure reflects the implementation of the principles of independence and competence as stipulated in the Bank's GCG provisions. With such composition, the BNI Audit Committee is able to perform its oversight functions and provide recommendations to the Board of Commissioners in an objective, professional, and independent manner, free from the influence of any vested interests. [ACGS D.2.19, D.2.20]

The number, structure, composition, and independence of all Audit Committee members have been ensured to comply with the provisions set forth in the Audit Committee Charter. The following is the composition of the BNI Audit Committee throughout 2025:

Period January 1, 2025 – March 26, 2025

Name	Position	Term of Office	Period	Position at the Bank [ACGS D.2.20]
Asmawi Syam*)	Chairman	July 20, 2020 - March 26, 2025	First	Independent Commissioner
Sigit Widyawan	Member	September 8, 2020 - March 26, 2025	Second	Independent Commissioner
Iman Sugema*)	Member	September 8, 2020 - February 20, 2025	First	Independent Commissioner

Name	Position	Term of Office	Period	Position at the Bank [ACGS D.2.20]
Human Brillianto	Independent Member	January 25, 2021 – September 30, 2025	Second	-
Suhendi Muharam	Independent Member	July 5, 2021 – December 18, 2025	Second	-

*) Effectively serving as a member of the Board of Commissioners until February 20, 2025, in connection with the expiration of the term of office as a member of the Board, which has been 5 (years) since the date of appointment.

In order to comply with the provisions of Financial Services Authority Regulation (POJK) No. 55/POJK.04/2015 dated December 29, 2015 concerning the Establishment and Implementation Guidelines of the Audit Committee, BNI has made adjustments to the composition of the Audit Committee. The changes were stipulated through BNI Board of Commissioners Decree No. KEP/010/DK/2025 dated September 2, 2025 concerning the Appointment of the Board of Commissioners as Members of the Audit Committee, with the following membership composition:

Periode 26 Maret 2025 – 18 Desember 2025

Name	Position	Term of Office	Period	Position at the Bank [ACGS D.2.20]
Didik Junaedi Rachbini	Chairman	September 2, 2025 - present	First	Independent Commissioner
Omar Sjawaldy Anwar	Member	September 2, 2025 - present	First	President Commissioner/ Independent Commissioner
Vera Febyanthy	Member	September 2, 2025 - present	First	Independent Commissioner
Human Brillianto	Independent Member	January 25, 2021 – September 30, 2025	Second	-
Suhendi Muharam	Independent Member	July 5, 2021 – December 18, 2025	Second	-

In order to comply with the Regulation of the Minister of State-Owned Enterprises Number PER-3/MBU/03/2023 concerning State-Owned Enterprises' Organs and Human Resources, BNI has made adjustments to the composition of the Audit Committee as stipulated in BNI Board of Commissioners Decree No. KEP/034/DK/2025 and KEP/036/DK/2025 dated December 18, 2025, concerning the Appointment of Independent Members of the Audit Committee, as follows:

Period December 18, 2025 – December 31, 2025

Name	Position	Term of Office	Period	Position at the Bank [ACGS D.2.20]
Didik Junaedi Rachbini	Chairman	September 2, 2025 - present	First	Independent Commissioner
Omar Sjawaldy Anwar	Member	September 2, 2025 - present	First	President Commissioner/ Independent Commissioner
Vera Febyanthy	Member	September 2, 2025 - present	First	Independent Commissioner
Alih Suasono	Independent Member	December 18, 2025–present	First	Independent Party
Jhon Fernando Tamba	Independent Member	December 18, 2025–present	First	Independent Party

The composition of the Audit Committee membership as listed in the table above shows that all individuals appointed as Chair and members are independent parties, either as Independent Commissioners or external professionals who have no interest relationship with the Bank. In compliance with the provisions of POJK No. 55/POJK.04/2015 dated December 23, 2015 concerning the Establishment and Guidelines for the Implementation of the Audit Committee, BNI has submitted information regarding the appointment and/or dismissal of Audit Committee members to the OJK within a maximum period of 2 (two) working days from the date the decision was made, and has published this information on the Indonesia Stock Exchange website and the Bank's official website. [ACGS D.2.19, D.2.20]

AUDIT COMMITTEE PROFILE

More detailed information regarding the profiles of the Audit Committee members as members of the Bank's Board of Commissioners can be found in the Company Profile chapter, sub-chapter Board of Commissioners Profile, in this Annual Report. The following is a brief profile of the members of BNI's Audit Committee as of December 31, 2025:

Audit Committee Chairman [ACGS D.2.20]

Didik Junaedi Rachbini	
Legal Basis of Appointment	Decree (SK) of the Board of Commissioners of BNI No. KEP/010/DK/2025 dated September 2, 2025
Term of Office	September 2, 2025 - present
Professional Certication	Risk Management Certification Level/Qualification 6 without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Sub-chapter on the Board of Commissioners Profile.

Member of the Audit Committee, Concurrently as the Board of Commissioners

Omar Sjawaldy Anwar	
Legal Basis of Appointment	Decree (SK) of the Board of Commissioners of BNI No. KEP/010/DK/2025 dated September 2, 2025
Term of Office	September 2, 2025 - present
Professional Certication	Risk Management Certification Level/Qualification 6 without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Sub-chapter on the Board of Commissioners Profile.

Vera Febyanthy	
Legal Basis of Appointment	Decree (SK) of the Board of Commissioners of BNI No. KEP/010/DK/2025 dated September 2, 2025
Term of Office	September 2, 2025 - present
Professional Certication	Risk Management Certification Level/Qualification 6 without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Sub-chapter on the Board of Commissioners Profile.

Member of the Audit Committee from Independent Party



Alih Suasono
Member of the Audit Committee

Age
58 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor's Degree (S1) from Gadjah Mada University (1991)
- Master's Degree (S2) in Human Resource Management from Tanjungpura University (2003)

Legal Basis for Appointment
Initially appointed as an Independent Member of the Audit Committee pursuant to the Board of Commissioners' Decree No. KEP/034/DK/2025 dated December 18, 2025, concerning the Appointment of an Independent Member of the Audit Committee.

Term of Office
December 18, 2025 – present (First Term)

Professional Certification and/or Training
Banking Risk Management Competency Certification Level 4

Work Experience
- Head of Small Credit Center Batam, PT Bank Negara Indonesia Tbk (2010–2012)
- Head of Medium Credit Center Surabaya, PT Bank Negara Indonesia Tbk (2012–2013)
- Head of Medium Credit Center Pekanbaru, PT Bank Negara Indonesia Tbk (2013–2016)
- Head of Medium Credit Center Malang, PT Bank Negara Indonesia Tbk (2016–2017)
- Head of Regional Banking Business Malang, PT Bank Negara Indonesia Tbk (2017–2019)
- Deputy Head of Medium Enterprise Business Division, PT Bank Negara Indonesia Tbk (2019–2021)
- Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025–present)

Concurrent Positions
BNI
-

Other Companies/Institutions
-



Jhon Fernando Tamba
Member of the Audit Committee

Usia
57 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor's Degree (S1) in Accounting from Gadjah Mada University (1995)
- Master's Degree (S2) in Management from the University of Indonesia (2007)

Legal Basis for Appointment
Initially appointed as an Independent Member of the Audit Committee pursuant to the Board of Commissioners' Decree No. KEP/036/DK/2025 dated December 18, 2025, concerning the Appointment of an Independent Member of the Audit Committee.

Term of Office
December 18, 2025 – present (First Term)

Professional Certification and/or Training
Banking Risk Management Competency Certification Level 4

Work Experience
Previously held various positions at PT Bank Negara Indonesia (Persero) Tbk, including 15 years of experience in the Internal Audit function.
- General Manager, Corporate Finance & Treasury Department, PT Adhi Karya (Persero) (2021–2023)
- Head of Network Credit Audit Group, PT Bank Negara Indonesia Tbk (2010–2012)
- Group Head of Corporate Business Banking, PT Bank Negara Indonesia Tbk (2012–2013)
- Deputy Division Head of Corporate Business Risk Division, PT Bank Negara Indonesia Tbk (2013–2014)
- Deputy Head of Corporate Credit Risk & MHE Division, PT Bank Negara Indonesia Tbk (2014–2019)
- Deputy Head of Corporate & Multinational Business Division 2, PT Bank Negara Indonesia Tbk (2019–2021)
- Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025 – present)

Concurrent Positions
BNI
-

Other Companies/Institutions
-

QUALIFICATIONS, EDUCATION, AND WORK EXPERIENCE OF THE AUDIT COMMITTEE

The membership requirements for BNI's Audit Committee include the following:

1. Must possess high integrity, good character and morals, competence, knowledge, and experience relevant to their field of work, as well as strong communication skills.
2. Must not be an individual who has worked for or held authority and responsibility in planning, leading, controlling, or supervising the Company's activities within the past six (6) months, except for Independent Commissioners.
3. Must not be affiliated with a Public Accounting Firm, Law Firm, Public Appraisal Service Office, or any other party providing assurance services, non-assurance services, appraisal services, and/or other consulting services to the Company within the past six (6) months.
4. Must have a thorough understanding of financial statements, the Company's business—particularly in relation to its services or business activities—audit processes, risk management, and capital market regulations, as well as other relevant laws and regulations.
5. Must comply with the Audit Committee Code of Ethics established by the Company.
6. Must be willing to continuously enhance their competencies through education and training.
7. Must not hold direct or indirect shares in the Company.
8. In the event that an Audit Committee member acquires shares in the Company, whether directly or indirectly, due to a legal event, such shares must be transferred to another party within no more than six (6) months from the date of acquisition.
9. Must not have any affiliation with members of the Board of Commissioners, members of the Board of Directors, or the Company's Major Shareholders.
10. Must not have any direct or indirect business relationships related to the Company's business activities.
11. The committee must sign an integrity pact, which is a statement and commitment to comply with all laws and regulations and the principles of good corporate governance.

QUALIFICATIONS, EDUCATION AND FIELDS OF EXPERTISE OF THE AUDIT COMMITTEE

The expertise of the Audit Committee, particularly those from independent parties, must be demonstrated by holding at least one competency certification that supports the committee's functions and responsibilities. These may include certifications in risk management, public accounting, accountancy, and auditing. In accordance with these requirements, the Bank ensures that the Chairman and all serving members of the Audit Committee meet the educational and professional experience qualifications outlined in the table below:

Educational Qualifications and Work Experience, and Fields of Expertise of the Audit Committee Per December 31, 2025

Name	Position	Education	Work Experience	Areas of Expertise
Didik Junaedi Rachbini	Chairman	His work experience can be seen in the section on Diversity of the Board of Commissioners	His work experience can be seen in the section on Diversity of the Board of Commissioners	Economy
Omar Sjawaldy Anwar	Member	His work experience can be seen in the section on Diversity of the Board of Commissioners	His work experience can be seen in the section on Diversity of the Board of Commissioners	• Accounting • Strategic Management • Finance • Technology
Vera Febyanthy	Member	His work experience can be seen in the section on Diversity of the Board of Commissioners	His work experience can be seen in the section on Diversity of the Board of Commissioners	• Public Administration • Public Policy • Finance

Name	Position	Education	Work Experience	Areas of Expertise
Alih Suasono	Independent Member	• Bachelor's Degree (S1) from Gadjah Mada University • Master's Degree (S2) in Human Resource Management from Tanjungpura University	• Head of Batam Small Credit Center (2010-2012). • Head of Surabaya Commercial Credit Center (2012-2013) • Head of Pekanbaru Commercial Credit Center (2013-2016) • Head of Malang Commercial Credit Center (2016-2017) • Head of Business Banking in Malang Region (2017-2019) • Deputy Head of Commercial Business Division (2019-2021) • Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025-present)	• Banking • Finance
Jhon Fernando Tamba	Independent Member	• Bachelor's Degree (S1) in Accounting from Gadjah Mada University • Master's Degree (S2) in Management from the University of Indonesia	• Head of Network Credit Audit Group (2010–2012) • Group Head of Corporate Business Banking Audit (2012–2013) • Deputy Division Head of Corporate Business Risk Division (2013–2014) • Deputy Head of Corporate Credit Risk & MHE Division (2014–2019) • Deputy Head of Corporate & Multinational Business Division 2 (2019–2021) • General Manager of Corporate Finance & Treasury Department at PT Adhi Karya (Persero) Tbk (2021–2023) • Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025 – present)	• Banking • Finance • Audit

STATEMENT OF INDEPENDENCE OF THE AUDIT COMMITTEE

BNI guarantees that all members of the Audit Committee are independent parties, with no financial, management, share ownership, and/or family relationships with members of the Board of Commissioners, Board of Directors, and/or Controlling Shareholders. Furthermore, there are no connections with the Bank that could affect independence and objectivity in the performance of duties, so that the monitoring and evaluation process can be carried out free from conflicts of interest.

All members of the Audit Committee have also signed a statement of independence as a form of commitment that every decision, review result, and recommendation submitted is always based on professional and objective considerations, to support the best interests of the Bank and the implementation of GCG. Furthermore, the composition of the BNI Audit Committee is in accordance with the provisions of OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks, while the policies and criteria for independence are regulated in detail in the BNI Audit Committee Code of Ethics.

Table of Audit Committee Independency

Aspek Independensi	Didik Junaedi Rachbini	Omar Sjawaldy Anwar	Vera Febyanthy	Alih Suasono	Jhon Fernando Tamba
No financial relationships with the Board of Commissioners and the Board of Directors	√	√	√	√	√
No management relationships in the company, subsidiaries or affiliated companies	√	√	√	√	√
No share ownership relationship in the company	√	√	√	√	√
No familial relationships with the Board of Commissioners, the Board of Directors, and/or fellow members of the Audit Committee	√	√	√	√	√
Not serving on the board of political party or government official	√	√	√	√	√

DUAL POSITION INFORMATION

As a form of transparency and accountability, BNI openly discloses information regarding the concurrent positions held by each member of the Audit Committee. This information is presented in full in the following table:

Name	Position in the Bank	Position in Other Banks	Position in Other Public Companies	Position in Other State Owned Enterprises
Didik Junaedi Rachbini	Chairman of the Audit Committee and Independent Commissioner	None	Independent President Commissioner at PT Lippo Cikarang Tbk	None
Omar Sjawaldy Anwar	Member and Independent Commissioner	None	None	None
Vera Febyanthy	Member and Independent Commissioner	None	None	None
Alih Suasono	Independent Member	None	None	None
Jhon Fernando Tamba	Independent Member	None	None	None

AUDIT COMMITTEE MEETINGS

Meeting Implementation Policy [ACGS D.2.23]

As stipulated in the Audit Committee Charter, BNI Audit Committee Meetings are held in accordance with established policies and procedures, as follows:

1. The Audit Committee must hold meetings at least once a month.
2. An Audit Committee meeting is considered valid if attended by the majority of committee members.
3. Decisions in committee meetings are made based on deliberation and consensus. If consensus is not reached, decisions are made by a majority vote.
4. Meetings are chaired by the Chairman of the Audit Committee or by an Audit Committee member who is an Independent Commissioner if the Chairman is unable to attend.;
5. Every Audit Committee meeting must be documented in minutes of the meeting, signed by all attending members. Any dissenting opinions must be explicitly recorded along with the reasoning behind the disagreement.
6. Meetings may be conducted physically or via video conference or other media that allow all participants to see and hear each other directly and actively participate in the meeting.
7. The attendance of committee members in meetings is reported in the quarterly and annual reports of the Committee.

Meeting Frequency and Attendance of Committee Members [ACGS D.2.23]

Throughout 2025, the BNI Audit Committee held 20 (twenty) meetings. During the period from March 26, 2025 to September 2, 2025, there were no effective members of the Audit Committee on the Board of Commissioners because they were still undergoing the OJK Fit & Proper Test. However, during that period, the Audit Committee held eight (8) internal consolidation and discussion sessions with the relevant directors to provide orientation and in-depth information on BNI's condition in preparation for the Audit Committee to carry out its duties and functions. The frequency of these meetings was in accordance with the provisions set forth in the Audit Committee Charter. All of these meetings were held to ensure the effectiveness of the supervisory and coordination functions, particularly in discussing strategic issues and important findings that require immediate follow-up by the Board of Commissioners.

The following is the attendance data of BNI Audit Committee members in Audit Committee meetings during 2025, which reflects the level of participation and commitment of members in carrying out their supervisory duties and responsibilities effectively and consistently:

Name	Position	Number of Meetings [ACGS D.2.23]	Attended [ACGS D.2.23]	Percentage [ACGS D.2.23]
Asmawi Syam[1)]	Chairman	5	5	100%
Iman Sugema[1)]	Member	5	5	100%
Sigit Widyawan[2)]	Member	7	7	100%
Didik Junaedi Rachbini[3)]	Chairman	5	5	100%
Omar Sjawaldy Anwar[3)]	Member	5	4	80%
Vera Febyanthy[3)]	Member	5	5	100%
Human Brillianto[4)]	Independent Member	8	8	100%
Suhendi Muharam[5)]	Independent Member	12	12	100%
Alih Suasono[6)]	Independent Member	-	-	-
Jhon Fernando Tamba[6)]	Independent Member	-	-	-

[1)] Effectively serving as Chairperson/Member of the Audit Committee until February 20, 2025, in connection with the expiration of the Board's term of office 5 (years) from the date of appointment
[2)] Effectively serving as a Member of the Audit Committee until March 26, 2025
[3)] Effectively serving as Chair/Member of the Audit Committee since September 2, 2025
[4)] Effectively serving as a Member of the Audit Committee until September 30, 2025
[5)] Effective as a Member of the Audit Committee until December 18, 2025
[6)] Effective as a Member of the Audit Committee since December 18, 2025

Meeting Agenda [ACGS D.2.23]

In 2025, the Audit Committee held 12 (twelve) meetings and 8 (eight) internal consolidations and discussions with relevant directors (during the period from March 26, 2025 to September 2, 2025) with the following agenda:

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
1.	January 14, 2025	Closing Meeting Audit of BNI Consolidated Financial Statements and Other Reports for the Fiscal Year Ending December 31, 2024	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	• Risk Management Director • Wholesale & International Banking Director • Technology & Operations Director • Retail Banking Director • Enterprise & Commercial Banking Director • Network & Services Director • SEVP Information & Technology • SEVP Credit Risk • SEVP Remedial & Recovery • SEVP Corporate Banking • SEVP Treasury • KAP Rintis, Jumadi, Rianto, and Partners (KAP RJRR/PwC Global Network Firm) • Related Divisions
2.	January 14, 2025	Internal Audit Committee Meeting	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	Chairman and all Members of the Audit Committee
3.	January 23, 2025	Evaluation of Bank Internal Audit Functions for the Second Semester of 2024	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	Internal Audit
4.	January 23, 2025	Discussion of Proposed Credit Book Write-off Plan	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	• Risk Management Director • Enterprise & Commercial Banking Director • Human Capital & Compliance Director • SEVP Credit Risk • Internal Audit • Related Divisions

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
5.	February 4, 2025	Internal Audit Committee Meeting	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	Chairman and all Members of the Audit Committee
6.	March 11, 2025	Internal Audit Committee Meeting	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	Chairman and all Members of the Audit Committee
7.	March 25, 2025	Discussion of Proposed Credit Book Write-off Plan	• Asmawi Syam[1)] • Iman Sugema[1)] • Sigit Widyawan[2)] • Human Brillianto[4)] • Suhendi Muharam[5)]	• Risk Management Director • Wholesale & International Banking Director • Human Capital & Compliance Director • SEVP Credit Risk • Internal Audit • Related Divisions
8.	April 15, 2025	Audit Committee Consolidation and Internal Discussion	• Didik Junaedi Rachbini[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	All Audit Committee Members
9.	April 23, 2025	Audit Committee Consolidation and Internal Discussion	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	All Audit Committee Members
10.	May 14, 2025	Discussion of Internal Audit Report Findings	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	Internal Audit
11.	June 13, 2025	Discussion on the Provision of Audit Services by KAP on Financial Statements and Other Reports for the 2024 Fiscal Year	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	• Finance & Strategy Director • Related Divisions
12.	June 17, 2025	Consolidation and Internal Discussion of the Audit Committee	• Didik Junaedi Rachbini[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	All Members of the Audit Committee
13.	June 23, 2025	Consolidation and Internal Discussion of the Audit Committee	• Didik Junaedi Rachbini[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	All Members of the Audit Committee
14.	July 29, 2025	Discussion on the Bank's Internal Audit Function for the First Half of 2025	• Didik Junaedi Rachbini[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	Internal Audit
15.	August 5, 2025	Consolidation and Internal Discussion of the Audit Committee	• Didik Junaedi Rachbini[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	All Members of the Audit Committee
16.	September 25, 2025	Kick-off Meeting for the Audit of BNI's Consolidated Financial Statements and Other Reports for the Fiscal Year Ending December 31, 2025 by KAP Rintis, Jumadi, Rianto, and Partners (KAP RJRR)	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Human Brillianto[4)] • Suhendi Muharam[5)]	• Finance & Strategy Director • Internal Audit • Related Divisions
17.	October 23, 2025	Evaluation of the Bank's Internal Audit Function for the Third Quarter of 2025	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Suhendi Muharam[5)]	Internal Audit
18.	November 6, 2025	Discussion of the Board of Directors' proposal regarding the Approval of the Write-off of Office Buildings	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Suhendi Muharam[5)]	• Finance & Strategy Director • Network & Retail Funding Director • Relevant SEVP • Relevant Division
19.	December 2, 2025	Discussion of the Internal Audit Examination Report	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Suhendi Muharam[5)]	• Finance & Strategy Director • Operations Director • Internal Audit • Relevant Division

No.	Meeting Dates	Meeting Agenda	Audit Committee Member	Invited
20.	December 18, 2025	Progress Meeting on the Audit of BNI's Consolidated Financial Statements and Other Reports for the Fiscal Year Ending on December 31, 2025 by KAP Rintis, Jumadi, Rianto, and Partners (KAP RJRR)	• Didik Junaedi Rachbini[3)] • Omar Sjawaldy Anwar[3)] • Vera Febyanthy[3)] • Suhendi Muharam[5)] • Alih Suasono[6)] • Jhon Fernando Tamba[6)]	• Finance & Strategy Director • KAP Rintis, Jumadi, Rianto, and Partners (KAP RJRR/PwC Global Network Firm) • Relevant Division

Internal consolidation and discussions conducted during this period did not involve any members of the Audit Committee (neither the Chair nor the Audit Committee Members) of the Board of Commissioners, as they were still undergoing the OJK Fit & Proper Test.

1) Effective as Chair/Member of the Audit Committee until February 20, 2025, in connection with the expiration of the Board's term of office of 5 (years) from the date of appointment
2) Effective as Member of the Audit Committee until March 26, 2025
3) Effectively serving as Chairman/Member of the Audit Committee since September 2, 2025
4) Effectively serving as Member of the Audit Committee until September 30, 2025
5) Effective as a Member of the Audit Committee until December 18, 2025
6) Effective as a Member of the Audit Committee since December 18, 2025

AUDIT COMMITTEE REPORTING

The Audit Committee shall periodically prepare and submit reports to the Board of Commissioners at least once every three (3) months, which shall include, among other things, the results of the performance of its duties, evaluations, and recommendations on issues that require the attention of the Board of Commissioners. In addition, the Audit Committee shall be required to report to the Board of Commissioners on every assignment given.

AUDIT COMMITTEE MEMBER COMPETENCY IMPROVEMENT PROGRAM IN 2025

Throughout 2025, all members of the Audit Committee participated in various education and training programs aimed at updating their knowledge, improving their competencies, and strengthening their understanding of, among other things, the latest developments in governance, risk management, auditing, and compliance. The details of the training activities attended by each member of the Audit Committee are as follows:

Types of Training and Competency Development Materials/Training	Implementation Date	Organizer
Didik Junaedi Rachbini – Chairman of the Audit Committee/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Omar Sjawaldy Anwar – Member of Audit Committee/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Vera Febyanthy – Member of Audit Committee/Independent Commissioner		
Competency development/training can be found in the Section of Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Alih Suasono – Member of the Audit Committee (Independent Party)		
Audit Committee Onboarding	December 18, 2025	BNI Corporate Secretary
Jhon Fernando Tamba – Member of the Audit Committee (Independent Party)		
Audit Committee Onboarding	December 18, 2025	BNI Corporate Secretary

AUDIT COMMITTEE KPI ACHIEVEMENTS IN 2025

The Audit Committee's performance is assessed based on Key Performance Indicators (KPIs) that have been agreed upon at the beginning of the year as a benchmark for performance achievement. In 2025, the Audit Committee successfully achieved 166.67% of its KPI targets. This achievement reflects the success of the Audit Committee in carrying out its duties and responsibilities, including assisting the Board of Commissioners in performing its internal control functions, improving the transparency of financial reporting, and ensuring compliance with applicable accounting standards. This success is not only measured by the number of audit findings, but also through qualitative indicators that reflect the effectiveness of supervision, the accuracy of recommendations, and the tangible contribution to improving GCG principles.

WORK PROGRAM AND IMPLEMENTATION OF AUDIT COMMITTEE DUTIES IN 2025

The BNI Audit Committee has developed an annual work program that serves as a strategic guide in carrying out its supervisory functions and providing recommendations to the Board of Commissioners. This work program was developed taking into account the Bank's policy direction, regulatory developments, and the dynamics of risks faced by the banking industry. During 2025, the Audit Committee carried out various monitoring and evaluation activities on the effectiveness of internal controls, the quality of financial reporting, and the level of compliance with applicable regulations. Each evaluation result and recommendation were systematically communicated to the Board of Commissioners to support the strengthening of governance and improvement of organizational performance.

In 2025, the Audit Committee held 20 (twenty) meetings and/or internal discussions, and 38 (thirty-eight) evaluations/studies/reviews. Furthermore, the description of the BNI Audit Committee's task implementation report for the current year is presented as follows:

1. Reviewing financial information to be disclosed by the Company to the public and/or regulatory authorities.
2. Reviewing the Company's monthly performance reports.
3. Reviewing compliance with laws and regulations related to the Company's business activities.
4. Providing recommendations to the Board of Commissioners regarding the appointment of a Public Accountant (AP) and a Public Accounting Firm (KAP) for auditing the Consolidated Financial Statements and other reports for the 2025 financial year.
5. Evaluating the audit services performed by the appointed KAP for the Consolidated Financial Statements and other reports for the 2024 financial year, including assessing the independence and objectivity of the KAP, for submission to the Financial Services Authority (OJK) and the Ministry of State-Owned Enterprises (BUMN).
6. Implementation of tasks related to the Bank Business Plan (RBB)/Company Budget Work Plan (RKAP) and Sustainable Financial Action Plan, including review of BNI's RBB/RKAP for 2026, the 2026-2030 Company Long-Term Plan (RJPP), and the 2026 Sustainable Financial Action Plan (RAKB).
7. Reviewing the audit findings from both internal and external auditors and overseeing the followup actions by the Board of Directors, covering:
   a. Reviewing the audit results conducted by OJK, BPK, KAP, BI, BPKP, and other regulators, as well as monitoring the follow-up actions taken based on these audit findings.
   b. Monitoring, advising, and overseeing the preparation of key audit findings reports for submission to OJK.
   c. Reviewing the planning and execution of compliance functions through assessments conducted by the Compliance Division, as well as overseeing follow-up actions based on these reviews.
   d. Monitoring the progress of employee case resolutions and follow-up actions related to fraud cases.
8. Carrying out assignments related to the Company's Internal Audit function, with the results forming the basis of the Audit Committee's recommendations to the Board of Commissioners for their approval or consideration, including:
   a. Reviewing proposals from the Board of Directors regarding the dismissal and appointment of the Internal Audit Head.
   b. Assessing the planning and execution of Internal Audit's 2025 audit and consultation functions.
   c. Reviewing proposed updates to BNI's Internal Audit Charter.
   d. Reviewing the proposal for appointing an external consultant to conduct an independent review of the Internal Audit function in 2025.
9. Evaluating BNI's Internal Control System, including.
   a. Assessing the implementation of the Whistleblowing System (WBS).
   b. Evaluating the implementation of the AntiFraud Strategy Program.
10. Conducting assignments related to the implementation of Internal Control Over Financial Reporting (ICOFR).
11. Implementation of tasks related to BNI's Financial Institution Pension Fund (DPLK), namely:
    a. Conducting a review of the realization of BNI's DPLK Business Plan for the second semester of 2024.
    b. Reviewing updates to BNI's Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML, CTF, and CPF) policies.
12. Implementation of tasks related to BNI Financial Institution Pension Fund (DPLK), namely:
    a. Reviewing the realization of BNI DPLK business as a recommendation for the Board of Commissioners in submitting a Supervisory Report on the realization of BNI DPLK business to the Financial Services Authority for Non-Bank Financial Industry (OJK IKNB);

b. Reviewing the implementation of BNI DPLK governance;
c. Reviewing updates to BNI DPLK's Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML, CTF, and CPF) policies;

13. Conducting Audit Committee Working Visits to BNI Regional Offices and BNI Overseas Branches in order to evaluate, among other things:
    a. Operational management
    b. Performance
    c. Implementation of established business strategies
    d. Risk management and compliance with local banking regulations and internal Bank policies
    e. Market conditions and business development opportunities in the covered areas.
14. Conducting Audit Committee Working Visits in the context of Commercial Banking Segment Credit Evaluation to BNI Regional Offices and Commercial Business Centers (CMCs).
15. Reviewing reports/proposals/letters from Management and/or letters from Regulators as directed by the Board of Commissioners, including:
    a. BNI's Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML, CTF, CPF) reports;
    b. Proposals for Credit Write-Off Plans;
    c. Audit Reports;
    d. Reports and/or Letters from Regulators and/or External Auditors (OJK, BPK, KAP, KBUMN).

In carrying out its duties and responsibilities, the BNI Audit Committee also continuously builds effective working relationships with various stakeholders, both internal and external, to ensure comprehensive and objective oversight functions. These working relationships include coordination with the Internal Audit Unit (SKAI/IAD), Management, Public Accountants and/or Public Accounting Firms (KAP), as well as supervisory authorities such as the Financial Services Authority (OJK), Bank Indonesia (BI), and other relevant authorities, including the Financial Institution Pension Fund (DPLK).

Synergy with these parties is carried out in order to ensure the effectiveness of internal controls, the accuracy of financial reporting, and compliance with applicable regulations. The following is the realization of the implementation of the BNI Audit Committee's tasks in 2025 regarding working relationships with each of the interested parties:

Implementation of the Audit Committee's Working Relationship with Internal Audit (IAD)

No.	Main Tasks	Implementation Details	Implementation Date
1.	Evaluation of the Bank's Internal Audit Function for the Second Semester of 2024	a. Realization of Internal Audit RAT b. Key Audit Findings (including in-depth report findings) c. Progress of Follow-up on Internal Audit and External Auditor Examinations d. Management of Whistle Blowing System (WBS)	January 23, 2025
2.	Review of the IAD Audit and Consultation Plan for 2025	Audit Committee Recommendations Audit Plan and Internal Audit Consultation for 2024	February 3, 2025
3.	Discussion of Internal Audit Examination Audit Results Report	Discussion and Review of Internal Audit Examination Results Report	May 14, 2025
4.	Dismissal and Appointment of Internal Audit Leaders	Audit Committee Recommendations on the Dismissal and Appointment of Internal Audit Leaders	August 5, 2025
5.	Evaluation of the Bank's Internal Audit Function for the First Half of 2025	a. Realization of Internal Audit RAT b. Audit Findings (including in-depth report findings) c. Progress of Internal Audit and External Auditor Follow-up d. Whistle Blowing System Management (WBS)	July 29, 2025
6.	Evaluation of the Bank's Internal Audit Function for the Third Quarter of 2025	a. Realization of Internal Audit RAT b. Audit Findings (including in-depth report findings) c. Progress of Internal Audit and External Auditor Follow-up d. Whistle Blowing System Management (WBS)	October 23, 2025
7.	Discussion of Internal Audit Examination Audit Results Report	Discussion and Review of Internal Audit Findings Report	December 2, 2025

Implementation of Audit Committee Working Relationship with Public Accountant and/or Public Accounting Firm [ACGS D.2.24]

No.	Main Tasks	Implementation Details	Implementation Date
1.	Procurement of Public Accounting Firm (KAP) Audit Services	1) Review of the Proposed HPS for KAP Procurement in 2025	February 3, 2025
		2) Audit Committee Recommendations on the Appointment of Public Accountants and/or Public Accounting Firms for Audit Services for Consolidated Financial Statements and Other Reports for the 2025 Fiscal Year	March 11, 2025
		3) Review of Board of Directors Letter Number DIR/910 dated November 19, 2025 regarding the Principle Permit for Procurement and Procurement Budget for KAP in 2026	November 26, 2025
2.	Financial Statements	1) Closing Meeting for Audit of Consolidated Financial Statements and Other Reports for Fiscal Year 2025	January 14, 2025
		2) Review of Financial Statements for December 2024	January 15, 2025
		3) Review of the June 2025 Financial Statements	July 17, 2025
		4) Review of the August 2025 Financial Statements	September 18, 2025
		5) Kick Off Meeting for the Audit of the Consolidated Financial Statements and Other Reports for the 2025 Fiscal Year	September 25, 2025
		6) Review of the September 2025 Financial Statements	October 22, 2025
		7) Review of Financial Statements for October 2025	December 11, 2025
		8) Progress Meeting on the Audit of Consolidated Financial Statements and Other Reports for the 2025 Fiscal Year	December 18, 2025
3.	Audit Committee Evaluation Report	1) Audit Committee Evaluation of the Provision of Audit Services by KAP for the 2024 Fiscal Year – submitted to the Ministry of State-Owned Enterprises	April 16, 2025
		2) Audit Committee Evaluation of the Implementation of Audit Services by KAP for the 2024 Fiscal Year – submitted to the Ministry of Financial Services	June 26, 2025

Implementation of the Audit Committee's Working Relationship with Financial Services Authority, Bank Indonesia and Other Authorities

No.	Main Tasks	Implementation Details	Implementation Date
1.	Compliance Audit on Information Technology Management for 2023 and 2024 (First Semester) by the Indonesian Audit Board	Submission of Audit Reports	September 1, 2025
2.	Compliance Audit on Revenue Management for 2024 by the Indonesian Audit Board	Submission of Audit Reports	September 11, 2025
3.	General Audit of BNI for 2025 by the Financial Services Authority	Exit Meeting 2025	November 27, 2025
4.	Thematic Audit related to BNI's Financial Information Service System (SLIK) for 2025 by the Financial Services Authority	Exit Meeting 2025	December 16, 2025
5.	Fullscope Audit of BNI's Payment Service Providers (PJP) for 2025 by Bank Indonesia	Exit Meeting 2025	December 17, 2025

Implementation of the Audit Committee's Working Relationship with Management

No.	Main Tasks	Implementation Details	Implementation Date
1.	Suggestions and Advice from the Audit Committee	1) Review and Advice & Recommendations on Updating BNI's Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing Policies (AML, CTF, and CPFP).	January 8, 2025
		2) Review and Advice & Recommendations on the Proposed Credit Book Write-Off.	January 23, 2025
		3) Review and Advice & Recommendations on Anti-Fraud Strategy Policy.	January 29, 2025
		4) Review and Advice & Recommendations on Bank Credit Policy for 2025.	July 15, 2025
		5) Review and Advice & Recommendations on Socialization and Communication of the Scope of Implementation of Internal Control Over Financial Reporting (ICoFR).	July 17, 2025
		6) Review and Advice on BNI's Strategic Plan and IT (Information Technology) Architecture	July 31, 2025
		7) Review and Advice on the Request to Write Off the Garut Branch Office Building Asset	November 5, 2025
		8) Review and Advice on the NWOW and BRAVE corporate transformation updates	November 26, 2025
		9) Review and Advice on BNI's 2026 General Internal Control System Policy (KUSPI)	December 9, 2025
		10) Review and Advice on the Realization of Write-offs per Business Segment, including Root Cause Analysis and Risk Mitigation	December 11, 2025
2.	Evaluasi Komite Audit Evaluation of the Audit Committee	1) Evaluation of the 2025 Risk Maturity Index (RMI) Assessment Results (on BNI's 2024 Performance)	September 25, 2025
		2) Evaluation of Anti-Fraud Strategy	October 2, 2025
		3) Evaluation of the Company Budget Work Plan (RKAP), Collegial KPIs, Company Long-Term Plan (RJPP) 2026-2030, and Sustainable Financial Action Plan (RAKB) 2026	November 26, 2025
		4) Evaluation of BNI's 2026 Collegial KPI Proposals	November 26, 2025

Implementation of Audit Committee Working Relationship with Pension Fund Financial Institution (DPLK)

No.	Main Tasks	Implementation Details	Implementation Date
1.	Suggestions and Advice from the Audit Committee	1) Review and Suggestions & Advice on the Realization of the BNI DPLK Business Plan for the Second Semester of 2024	January 8, 2025
		2) Review and Advice & Recommendations on Updating the Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML, CTF, and CPF) Policies of DPLK BNI	January 8, 2025

Internal Audit Committee

No.	Main Tasks	Implementation Details	Implementation Date
1.	Audit Committee Work Plan	1) Discussion of Audit Committee Review Results	January 14, 2025
		2) Review of the Audit Committee Work Plan for 2025	January 15, 2025
		3) Discussion of Audit Committee Review Results	February 4, 2025
		4) Discussion of Audit Committee Review Results	March 11, 2025
		5) Discussion of Audit Committee Review Results	April 15, 2025
		6) Discussion of Audit Committee Review Results	April 23, 2025
		7) Discussion of Audit Committee Review Results	June 17, 2025
		8) Discussion of Audit Committee Review Results	June 23, 2025
		9) Discussion of Audit Committee Review Results	August 5, 2025

As a follow-up to the suggestions and recommendations made in various meetings during 2025, the Audit Committee also held in-depth discussions with relevant parties on a number of strategic and operational aspects that require special attention. These discussions covered key issues related to the quality of financial reporting, the effectiveness of internal controls, the results of external and internal audits, and the level of compliance with applicable regulations.

The main points of discussion between the Audit Committee and relevant parties during 2025 are as follows:

1. Management
   The Audit Committee reviews audited and unaudited financial statements published in 2025 to ensure that the content and disclosure of information are in accordance with accounting standards and applicable statutory provisions. Evaluation of the effectiveness of audit implementation by external auditors, independence, objectivity, and the adequacy of the scope of the audit is also carried out by the Audit Committee through discussions with Management. The Audit Committee also discusses and monitors the follow-up to the completion of audit findings, both internal audits and external audits, monitors the follow-up to the resolution of cases that occur in order to encourage accelerated resolution, and takes necessary administrative sanctions. In addition, the Audit Committee reviews and provides recommendations to the Board of Commissioners on proposals from Management that require approval or consultation with the Board of Commissioners.

2. External Auditor
   a. Public Accounting Firm (KAP) Implementing Audit Services for BNI Consolidated Financial Statements and Other Reports for Financial Year 2025
      With regard to the series of audit processes for the BNI Consolidated Financial Statement and Other Reports for the 2025 Financial Year by the Public Accounting Firm (KAP), the Audit Committee conveyed its concerns, suggestions and advice through holding a joint Committee Meeting with the Board of Directors and KAP, with discussions regarding the audit plan (including sampling, scope, model/methodology, use of Technology and AI, as well as the composition of the audit team) in the Audit Kick Off Meeting Agenda for the Audit of the BNI Consolidated Financial Statement and Other Reports for the 2025 Financial Year; Monitoring Progress on the implementation of the KAP Audit including findings that require further adjustments and/or confirmation; and Audit Clearance Meeting, presentation of all KAP audit results after the 2025 Financial Statement audit process has been completed.

   b. Implementing Consultant for the Review of BNI's Internal Audit Function in 2025
      The Audit Committee carries out its duties in evaluating BNI's Internal Audit Function, namely attending interview invitations from Independent Consultants, which is a series of review processes to obtain views from the Audit Committee regarding conditions that need to be improved in BNI's Internal Audit Function. Apart from that, holding a meeting with the Consultant Implementing the Review of BNI's Internal Audit Function to discuss the results of the Independent Consultant's review of BNI's Internal Audit Function in accordance with applicable laws and regulations and best practice. The Audit Committee provides constructive suggestions and advice to improve the effectiveness of BNI's Internal Audit Function, which is also in line with the results of the Independent Consultant's review.

   c. Implementing Consultant for Diagnostic Internal Control Over Financial Reporting (ICOFR) in 2025
      In order to comply with applicable laws and regulations and follow up on Shareholder Aspirations, BNI, which is included in Systemic A SOE, is required to carry out an Internal Control Over Financial Reporting (ICOFR) Diagnostic carried out together with an Independent Consultant, which aims to improve the quality of internal control over financial reporting.

      The role of the Audit Committee in implementing the ICOFR Diagnostics includes participating in a series of processes carried out by the Independent Consultant, namely attending interview invitations to convey the duties and functions of the Audit Committee

that have been carried out, especially in terms of reviewing the integrity of financial statements. Apart from that, the Audit Committee also reviews the results of the ICOFR Diagnostics and the proposed ICOFR Guidelines, which then become the Audit Committee's Recommendations to the Board of Commissioners, which are submitted at the Board of Commissioners Meeting forum.

d. Others
In addition, the Audit Committee is also active in attending Audit Exit Meeting invitations from the Financial Services Authority and the Financial Audit Agency.

e. Monitoring
In order to carry out the monitoring function of audit results by Regulators and external auditors (OJK, BPK, BI, KAP, etc.), the Audit Committee has carried out an evaluation of the follow-up actions carried out by Management. Review and evaluation of the results of the Regulator and external auditors for the period up to the end of 2025 are as follows:
1) Progress in completing the Bank Indonesia (BI) audit results is 100%;
2) Progress in completing the Financial Services Authority (OJK) audit results is 100%;
3) Progress in completing the Supreme Audit Agency (BPK) audit results is 70.25%, with 166 recommendations pending out of a total of 558 recommendations;
4) Progress in completing the Management Letter from KAP Rintis, Jumadi, Rianto dan Rekan (a member firm of PricewaterhouseCoopers) is 100%.
5) Progress in completing the audit results of the Financial and Development Supervisory Agency (BPKP) is 100%.

In order to comply with applicable laws and regulations, both POJK and Minister of SOE Regulations, the Audit Committee has prepared a Report on the Results of the Audit Committee's Evaluation of the Implementation of Audit Services for Annual Historical Financial Information for the 2024 Financial Year period by KAP Tanudiredja, Wibisana, Rintis, and Partner (a member firm of the PricewaterhouseCoopers network), which was submitted to the Ministry of SOE in April 2025 and to the OJK in June 2025.

3. Internal Audit
The Audit Committee reviews the annual internal audit plan, monitors the implementation and audit results from BNI Internal Audit (IAD), and follows up to its completion by Management. The Audit Committee also holds discussions with Internal Audit in an effort to encourage effectiveness and strengthen the Internal Audit function.

Based on the 2025 Internal Audit Annual Work Plan and Budget (RKAT), the realization of the planned activities carried out by Internal Audit is as follows:

No.	Activity	Plan	Realization
1.	Delivery Channel Audit including KLN	30	31
2.	Mandatory Audit	14	14
3.	Division Audit	1	1
4.	Subsidiaries Audit	3	3
5.	Non-IT/Thematic Audit	34	46
6.	IT/Application/Project Activity Audit	25	29
7.	Advisory	16	23
8.	Surprise Audit	2	2
	Total	125	149

The realization of Internal Audit activities reached 117.60% of the planned target based on the 2025 Annual Work and Budget Plan (RKAT).

Internal Audit conducted a total of 9 investigative audits (4 assignments were for credit examinations, 5 assignments were for non-credit examinations).

Follow-Up on Internal Audits until the End of 2025

	December 31, 2025	December 31, 2024	December 31, 2024
Total Due	2,237	5,003	6,833
Completed	2,211	4,998	6,830
Progress	**99.83%**	**99.88%**	**92.16%**

Whistleblowing System (WBS) Report

Number of Reports by Reporting Channel	2025	2024
WBS Channel	356	289
Outside WBS Channel	3	7
Total Reports	**359**	**296**

Follow-up Results	2025	2024
Proven	99*)	65
Unproven	142	230
Still under investigation	118	1

* Of the 99 proven reports, the criteria for violations included customer complaints (52 reports), confidential employee complaints (35 reports), violations of the code of ethics/unethical behavior (5 reports), violations of regulations/laws (5 reports), and fraud (2 reports).

4. Compliance Director
   Based on the Audit Committee's review of the Compliance Report on adherence to banking regulations and other relevant laws and regulations, the following conclusions were conveyed:
   a. Throughout 2025, the Company regularly submitted reports to the Financial Services Authority (OJK) in accordance with OJK Regulation No. 46/POJK.03/2017 concerning the Implementation of the Compliance Function for Commercial Banks. In addition, the Audit Committee conducted reviews and discussions on the Compliance Division's work plan, the progress of employee case handling, and the implementation of the Anti-Fraud Strategy Program.
   b. Discussions on the Compliance Division's work plan were conducted to enhance the effectiveness of synergy among the Compliance Division, the Anti-Fraud function, and Internal Audit in carrying out supervisory functions, particularly in ensuring the Company's compliance with applicable regulations.
   c. Based on the examination and evaluation of the employee case resolution process in 2025, a total of 106 cases were recorded, consisting of 86 cases that had been resolved and 20 cases that were still in the process of resolution. For cases that had been resolved, employees proven to have committed violations and/or fraud were subject to administrative sanctions, including: termination of employment for 38 employees; demotion for 11 employees; severe written warnings for 20 employees; written warnings for 57 employees; and coaching letters for 71 employees.
   d. The implementation of the Anti-Fraud Strategy for the second semester of 2025 was reported to OJK in January 2026, while the implementation of the Anti-Fraud Strategy for the first semester of 2025 was reported to OJK in July 2025. In 2025, there were 42 internal fraud incidents (one of which constituted significant fraud and was reported to OJK on an incidental basis), while the number of external fraud incidents amounted to 13 cases.
5. Board of Commissioners
   The Audit Committee's duties, responsibilities, and recommendations are periodically reported to the Board of Commissioners, with key highlights including:
   a) The review of the proposed appointment of KAP for 2025 and the Audit Committee has provided recommendations to the Board of Commissioners to appoint the Public Accounting Firm KAP Rintis, Jumadi, Rianto & Partners (a member firm of the PricewaterhouseCoopers network) to audit the Consolidated Financial Statements and Other Reports ending December 31, 2025, and to evaluate the effectiveness of the implementation of Public Accounting Firm Audit Services in 2024 (including aspects of independence and objectivity);
   b) Reviewing the Bank's published financial statements;
   c) Assessing the effectiveness of the Internal Audit function concerning the realization of RKAT, audit findings and recommendations, compliance with Internal Control, risk management processes, and corporate governance (GCG) implementation;
   d) Evaluating the effectiveness of follow-ups on Internal and External Auditor findings and recommendations;

e) Reviewing the company's monthly performance reports, proposed revisions to the 2025 RBB/RKAP, and proposed RBB/RKAP for 2025–2028 and RAKB for 2026 submitted by Management;
f) Reviewing and providing input on the proposal for credit write-offs within a range of IDR 100 billion to IDR 200 billion;
g) Examining management proposals requiring approval from the Board of Commissioners; and
h) Formulating key recommendations and advice from the Audit Committee meetings and recommending that the Board of Commissioners communicate these recommendations to Management for followup actions.

AUDIT COMMITTEE STATEMENT ON THE ADEQUACY OF INTERNAL CONTROL AND RISK MANAGEMENT SYSTEMS

The Audit Committee assesses that the internal control and risk management systems implemented within BNI's internal environment are effective, adequate, and capable of managing risks and business opportunities to support the Bank's business objectives without compromising financial performance, compliance, or reputation. The Bank's internal control and risk management systems provide tools to anticipate and manage risks by considering changes in risk profiles due to shifts in business strategy, external factors, and regulatory requirements. This is reflected in the effectiveness of internal control and risk management functions, including internal audit, compliance, financial, and operational controls.

AUDIT COMMITTEE WORK PLAN FOR 2026

The Audit Committee has prepared and established a work plan for the upcoming year 2026, which will be carried out in the form of committee meetings, reviews, and reports to the Board of Commissioners, with the following strategic priorities:

1. Reviewing financial information to be disclosed to the public and/or regulatory authorities (Quarterly);
2. Reviewing financial information (Monthly);
3. Reviewing the procurement of KAP and recommending the appointment of a KAP for the 2026 financial year audit to the Board of Commissioners;
4. Evaluating the general audit services provided by KAP for the 2025 Consolidated Financial Statements and other reports; Reviewing internal and external audit examinations and overseeing management's follow-up actions on audit findings;
5. Reviewing and recommending the Annual Audit and Consultation Plan to the Board of Commissioners;
6. Review of the implementation of Good Corporate Governance (GCG) in the Company;
7. Assessing compliance with laws and regulations related to the company's activities;
8. Reviewing the implementation of the Compliance Division's review and monitoring the follow-up on the review results;
9. Evaluating the implementation of the Anti-Fraud Strategy program;
10. Recommending a rating agency appointment to evaluate the company's financial health;
11. Reviewing the Company Work Plan and Budget (RKAP)/Bank Business Plan (RBB) and any changes thereto (if any);
12. Reviewing and updating the Audit Committee Charter;
13. Reviewing and updating corporate policies requiring Board of Commissioners' approval;
14. Mengikuti program Pendidikan dan pelatihan; dan
15. Following up on directives from the Board of Commissioners regarding reports/letters submitted to them.

AUDIT COMMITTEE MEMBER REMUNERATION [ACGS C.3.4]

The remuneration policy for committee members from the Board of Commissioners is integrated with their honorarium, with no special remuneration allocated for each committee member. Meanwhile, the remuneration for independent (non-Commissioner) committee members is determined by the Board of Commissioners, with a maximum limit of 20% of the President Director's salary and no additional income beyond this honorarium. This policy aligns with the provisions of Minister of SOEs Regulation No. PER-3/MBU/03/2023 dated March 20, 2023, regarding the Organization and Human Resources of State-Owned Enterprises.

NOMINATION AND REMUNERATION COMMITTEE
[ACGS D.2.8, D.2.13]

The establishment of the Remuneration and Nomination Committee at BNI aims to strengthen the supervisory function of the Board of Commissioners in ensuring that the nomination process and the determination of remuneration for strategic management po-sitions are carried out objectively, efficiently, and effectively. In line with GCG principles, OJK regulates the establishment of this committee to ensure compliance with the principles of transparency, accountability, responsibility, independence, and fairness, particularly in providing recommendations related to the nomination and remuneration processes for members of the Board of Commissioners, the Board of Directors, committee members at the Board of Com-missioners level, as well as all employees of the Bank.

In line with its strategic role in ensuring that the nomination and remuneration determi-nation processes are conducted objectively, efficiently, and effectively, the Nomination and Remuneration Committee is also respon-sible for conducting a comprehensive review and evaluation of the Bank's talent manage-ment systems and policies. It includes re-viewing career development mechanisms, leadership development programs, and the organizational structure, as well as evalu-ating organizational development proposals submitted by the Board of Directors, to en-sure alignment with the Bank's long-term business strategy, GCG principles, and future competency requirements.

LEGAL BASIS FORTHE ESTABLISHMENT OF THE NOMINATION AND REMUNERATION COMMITTEE

The establishment of the Nomination and Remuneration Committee refers to the following regulations:
1. Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, on Governance Implementation for Commercial Banks;
2. Financial Services Authority Regulation No. 34/POJK.04/2014, dated December 8, 2014, on the Nomination and Remuneration Committee for Issuers or Public Companies;
3. Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023, dated March 20, 2023, on the Organs and Human Resources of StateOwned Enterprises;
4. Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023, dated March 3, 2023, on Governance Guidelines and Significant Corporate Activities of State-Owned Enterprises; and
5. Board of Commissioners Decree No. Kep/01/DK/2002, dated December 2, 2002, on the Establishment of the Nomination and Remuneration Committee.

THE NOMINATION AND REMUNERATION COMMITTEE CHARTER [ACGS D.2.11, D.2.16]

BNI Nomination and Remuneration Committee carries out its duties and responsibilities based on its Charter, which has been aligned with Financial Services Authority Regulation No. 34/POJK.04/2014 on the Nomination and Remuneration Committee of Issuers or Public Companies and with good corporate governance practices.The BNI Nomination and Remuneration Committee Charter was enacted through the Board of Commissioners Decree of PT Bank Negara Indonesia (Persero) Tbk. No. KEP/019/DK/2024 dated June 6, 2024, concerning the Nomination and Remuneration Committee Charter.

The Nomination and Remuneration Committee Charter serves as a written and binding working guideline for each Committee member to ensure that all nomination and remuneration processes within the Bank are conducted in a transparent, objective, and structured manner. The role of the Nomination and Remuneration Committee is not limited to nomination and remuneration determination since it also covers the responsibility to review and evaluate the Bank's talent management systems and policies, including the evaluation of organizational development proposals submitted by the Board of Directors. This aims to ensure alignment between human capital management policies and the Bank's long-term business strategy as well as GCG principles.

The BNI Nomination and Remuneration Committee Charter regulates several matters, including:
1. Legal foundation;
2. Organizational structure and membership of the Nomination and Remuneration Committee;
3. Membership requirements for the Nomination and Remuneration Committee;
4. Responsibilities of the Nomination and Remuneration Committee;
5. Duties of the Nomination and Remuneration Committee;
6. Authority, rights, and obligations of the Nomination and Remuneration Committee;
7. Meetings of the Nomination and Remuneration Committee; and
8. Term of office for members of the Nomination and Remuneration Committee.

Taking into account business developments, the complexity of business activities, and regulatory changes, the BNI Nomination and Remuneration

Committee Charter is evaluated and updated periodically to ensure that it remains relevant and in line with current governance requirements. The latest update was implemented on September 19, 2025, and has been published on BNI's official website https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/KNR-Piagam-Komite-Nominasi-Remunerasi-Tahun-2025.pdf). This step was taken as a form of the Bank's commitment to transparency and openness of information to all stakeholders.

DUTIES AND RESPONSIBILITIES OF THE NOMINATION AND REMUNERATION COMMITTEE

The duties and responsibilities of the Nomination and Remuneration Committee as stipulated in the Nomination and Remuneration Committee Charter are as follows:

1. Related to the nomination function:
   a. Provide recommendations to the Board of Commissioners regarding:
      1) Composition of positions of members of the Board of Directors and/or members of the Board of Commissioners;
      2) Policies and criteria required in the Nomination process; and
      3) Performance evaluation policies for members of the Board of Directors and/or members of the Board of Commissioners.
   b. 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;
   c. 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;
   d. Conduct evaluations of candidates for BUMN representatives who will be proposed as members of the Board of Directors or members of the Board of Commissioners of Subsidiaries, before being submitted to the GMS/Minister;
   e. Prepare and provide recommendations to the Board of Commissioners regarding the system and procedures for selecting and/or replacing members of the Board of Commissioners and the Board of Directors to the Board of Commissioners to be submitted to the General Meeting of Shareholders;
   f. Prepare and provide recommendations to the Board of Commissioners regarding the management process and implementation of talent development for the needs of BUMN executives (Board of Directors and BOD-1).
   g. Provide recommendations to the Board of Commissioners regarding Independent Parties who will become members of the Audit Committee and Risk Monitoring Committee.
2. Regarding the Remuneration function:
   a. Conducting evaluations of the remuneration system/policy based on performance, risk, fairness with peer groups, targets, and longterm strategies of the Bank, fulfillment of reserves as stipulated in laws and regulations and the Bank's potential income in the future.
   b. Preparing and providing recommendations to the Board of Commissioners regarding:
      1) Remuneration structure;
      2) Remuneration policy; and
      3) Amount of remuneration;
      The structure, policy and amount of remuneration for the Board of Commissioners and Board of Directors mentioned above are evaluated by the Nomination and Remuneration Committee at least once a year.
   c. Delivering evaluation results and providing recommendations to the Board of Commissioners regarding:
      1) Remuneration policy for the Board of Directors and Board of Commissioners to be submitted to the General Meeting of Shareholders.
      2) Remuneration policy for executive officers and employees as a whole to be submitted to the Board of Directors.
   d. Ensuring that the remuneration policy is in accordance with applicable provisions.
   e. Conducting periodic evaluations of the implementation of the remuneration policy.
   f. Assisting the Board of Commissioners in assessing performance with the appropriateness of the remuneration received by each member of the Board of Directors and/or member of the Board of Commissioners.
3. Related to the Talent Management function:
   a. Conducting evaluations of the Talent Classification system and procedures carried out by the Board of Directors;
   b. Conducting periodic reviews of the company's Talent Management System and monitoring and evaluating its implementation;
   c. Validate and calibrate the Talents proposed by the Board of Directors to the Board of Commissioners/Supervisory Board (Selected Talent), to produce a list of Talents to be nominated by the Board of Commissioners/Supervisory Board to the GMS/Minister (Nominated Talent).
4. In appointing the President Commissioner, the Nomination and Remuneration Committee prepares a description of the job specifications, including time commitment requirements that also consider the need for time commitment

during a crisis. The existence of other significant commitments outside the corporation must be disclosed to the board of commissioners prior to appointment and disclosed in the annual report. Changes in commitments must be immediately reported to the board of commissioners and their impact explained in the next annual report.

5. In appointing Commissioners Members, the Nomination and Remuneration Committee determines the terms and conditions for appointing Commissioners Members. These terms and conditions are available for review. The expected time commitment is stated in the Letter of Appointment of Commissioners Members and Commissioners Members must have sufficient time to fulfill the expected time commitment. The existence of other significant commitments outside BNI must be disclosed to the Board of Commissioners prior to appointment, along with an indication of the time commitment required and the Board of Commissioners must be notified if there are changes to such commitments.
6. Develop guidelines to ensure that all members of the Board of Commissioners allocate sufficient time to the Bank to be able to carry out their responsibilities effectively. The guidelines include among others:
   a. The President Commissioner is committed to providing sufficient time and also considering the need for time commitments during times of crisis. Other significant commitments outside the Bank must be disclosed to the Board of Commissioners prior to appointment and disclosed in the annual report. Changes in commitments must be immediately reported to the Board of Commissioners and their impact explained in the next annual report.
   b. Members of the Board of Commissioners are committed to providing the expected time. Other significant commitments outside the Bank must be disclosed to the Board of Commissioners prior to appointment, along with an indication of the time commitment required and the Board of Commissioners must be notified if there are changes to such commitments.
7. Carrying out other tasks assigned by the Board of Commissioners related to the nomination and remuneration function.
8. The procedure for carrying out the duties and functions of the Nomination and Remuneration Committee is carried out based on the Financial Services Authority Regulation governing the Nomination and Remuneration Committee of Commercial Banks, the Financial Services Authority Regulation governing the Nomination and Remuneration Committee of Issuers or public companies and the Financial Services Authority Regulation governing the implementation of governance in providing remuneration for commercial banks, which are applicable.

AUTHORITY, RIGHTS, AND OBLIGATIONS OF THE NOMINATION AND REMUNERATION COMMITTEE

The BNI Nomination and Remuneration Committee has a number of authorities to:

1. Access records or information about employees, funds, assets, and other resources belonging to BNI related to the implementation of its duties. The Nomination and Remuneration Committee is required to report in writing the results of the assignment to the Board of Commissioners.
2. Cooperate with the Human Resources Division, Development and Learning Division, Budgeting and Financial Management Division, and other related Divisions.
3. In performing its duties, the Nomination and Remuneration Committee is authorized to recommend the appointment of an independent consultant, as proposed by the Board of Directors, to be appointed by the Board of Commissioners in order to support the Committee's functions and responsibilities, including the preparation of remuneration proposals based on benchmark data. In this regard, the Committee is responsible for the selection process and the terms of engagement of the consultant, as well as for disclosing the consultant's identity and service fees. Accordingly, the independent consultant engaged was PT Daya Dimensi Indonesia, with consulting fees set at IDR20,165,000 (twenty million one hundred sixty-five thousand Rupiah) per candidate, as part of the implementation of the principles of transparency and good corporate governance.
4. Must carry out its duties properly and maintain the confidentiality of all documents, data and information of the Company, both from internal and external parties and only used for the benefit of carrying out the duties of the Committee.
5. In carrying out its duties and responsibilities related to the remuneration policy, the Nomination and Remuneration Committee must pay attention to at least:
   a. Financial performance and fulfillment of reserves as stipulated in applicable laws.
   b. Individual work performance.
   c. Fairness with peer groups, and
   d. Consideration of the Bank's long-term goals and strategies.
6. Before the current fiscal year, the Nomination and Remuneration Committee must prepare and submit an Annual Work Plan and Budget to the Board of Commissioners for determination, a copy of which is submitted by the Board of Commissioners to the Board of Directors for their information. The implementation of the Nomination and Remuneration Committee's Annual Work Plan and Budget is reported to the Board of Commissioners.

7. The Nomination and Remuneration Committee is required to prepare and submit a report on the implementation of its duties, responsibilities and nomination and remuneration procedures to the Board of Commissioners.

POLICY ON APPOINTMENT, DISMISSAL, AND TERM OF OFFICE OF THE NOMINATION AND REMUNERATION COMMITTEE MEMBERS

The term of office of members of the Nomi-nation and Remuneration Committee origi-nating from the Board of Commissioners shall automatically end upon the expiration of their tenure as Commissioners. Should a member resign or cease to serve before the end of their term, a replacement shall be ap-pointed from among the other members of the Board of Commissioners. In the event that the Chair of the Committee steps down, the position must be filled by another Inde-pendent Commissioner no later than 30 (thir-ty) days from the end of the respective term. The replacement of Nomination and Remu-neration Committee members who are not part of the Board of Commissioners must be carried out no later than 60 (sixty) days after the concerned member is no longer able to perform their duties. The term of office for independent Committee members is a max-imum of 3 (three) years and may be extend-ed once for an additional 2 (two) years, re-sulting in a total maximum tenure of 5 (five) years, without prejudice to the right of the Board of Commissioners to dismiss Com-mittee members at any time.

STRUCTURE, MEMBERSHIP, AND EXPERTISE OF THE NOMINATION AND REMUNERATION COMMITTEE MEMBERS

The composition of the BNI Nomination and Remuneration Committee is determined in accordance with applicable regulations and the Nomination and Remuneration Committee Charter, to ensure that the principles of independence, competence, and professionalism are fulfilled. The following are the provisions related to the composition of the BNI Nomination and Remuneration Committee:

1. The Nomination and Remuneration Committee is established by the Board of Commissioners. The Board may form the Committee as a separate entity.
2. The Committee must act independently and report directly to the Board of Commissioners.
3. The appointment of Committee members is carried out by the Board of Directors based on a Board of Commissioners' resolution.
4. The Nomination and Remuneration Committee consists of at least 3 (three) members, namely 1 (one) Independent Commissioner who also serves as Chair, 1 (one) Commissioner and 1 (one) executive officer who oversees the human resources function or a party who holds a managerial position under the Board of Directors who oversees human resources at BNI.
5. Other members of the Nomination and Remuneration Committee other than the minimum members as stated in point 4) above may come from other members of the Board of Commissioners and parties from outside BNI.
6. If the Nomination and Remuneration Committee members are determined to consist of more than 3 (three) person, then the committee members who are Independent Commissioners must number at least 2 (two) person.
7. The majority of additional Committee members, as referred to in point (5), must not be managerial level officers below the Board of Directors responsible for human resources.
8. The Chair of the Nomination and Remuneration Committee must be an Independent Commissioner at BNI.
9. The Chairperson of the Nomination and Remuneration Committee is prohibited from holding concurrent positions as chair of more than 1 (one) committee in another committee and may only hold concurrent positions as Chairperson of a Committee in a maximum of 1 (one) other committee at BNI.
10. Committee members must not be members of the Board of Directors, either at BNI or at any other bank.
11. If deemed necessary, the Committee may appoint a Committee Secretary, whose assignment, rights, authority, and responsibilities are determined by the Committee Chair.

NUMBER, STRUCTURE, AND COMPOSITION OF MEMBERSHIP OF THE NOMINATION AND REMUNERATION COMMITTEE

As of the end of 2025, BNI's Nomination and Remuneration Committee consisted of six (6) members as stipulated in the Board of Commissioners Decree No. KEP/024/DK/2025 dated September 19, 2025. The composition of the Committee comprised 3 (three) members, namely 1 (one) Independent Commissioner who also served as Chair, 1 (one) Commissioner, and 1 (one) executive officer who supervised human resources functions or a party who held a managerial position under the Board of Directors in charge of human resources at BNI. This composition reflects BNI's commitment to maintaining a majority of independent members.

[ACGS D.2.9, D.2.10, D.2.14, D.2.15, (B).D.2.1]

The Bank ensures that the current structure and composition of the Nomination and Remuneration Committee comply with the provisions set out in the Nomination and Remuneration Committee Charter. The following is the composition of BNI's Nomination and Remuneration Committee throughout 2025:

January 1, 20245– March 26, 2025 Period

Name	Position	Term of Office	Position in the Bank
Pradjoto[1)]	Chairman [ACGS D.2.10, D.2.15]	September 21, 2023-March 26, 2025	President Commissioner/ Independent Commissioner
Pahala Nugraha Mansury[3)]	Member	October 30, 2023-March 26, 2025	Vice President Commissioner
Sigit Widyawan[3)]	Member	July 20, 2020-March 26, 2025	Independent Commissioner
Askolani[3)]	Member	January 30, 2020-March 26, 2025	Commissioner
Asmawi Syam[2)]	Member	July 20, 2020-March 26, 2025	Independent Commissioner
Iman Sugema[2)]	Member	August 27, 2020-March 26, 2025	Independent Commissioner
Septian Hario Seto[2)]	Member	August 27, 2020-March 26, 2025	Independent Commissioner
Erwin Rijanto Slamet[3)]	Member	August 16, 2021-March 26, 2025	Independent Commissioner
Fadlansyah Lubis[3)]	Member	December 29, 2022-March 26, 2025	Commissioner
Robertus Billitea[3)]	Member	September 21, 2023-March 26, 2025	Commissioner
Mohamad Yusuf Permana[3)]	Member	October 22, 2024-March 26, 2025	Commissioner
Danni Tri Suryani[3)]	Independent Member	August 10, 2020-March 26, 2025	-
Yenni Sari Dewi	Member	May 26, 2023-present	Human Capital Strategy Division Head

1) Effectively serving as Chair of the Nomination and Remuneration Committee until February 20, 2025, in connection with the expiration of his term as a member of the Board of Commissioners, 5 (five) years from the date of appointment.
2) Effectively serving as a Member of the Nomination and Remuneration Committee until February 20, 2025, in connection with the expiration of his term as a member of the Board of Commissioners, 5 (five) years from the date of appointment.
3) Effective as Member of the Nomination and Remuneration Committee until March 26, 2025

In order to comply with the provisions of Fi-nancial Services Authority Regulation (POJK) No. 34/POJK.04/2014 concerning the Nomi-nation and Remuneration Committee of Issu-ers or Public Companies, BNI has adjusted the composition of its Nomination and Re-muneration Committee. Such changes were stipulated through the Board of Commission-ers Decree No. KEP/007/DK/2025 dated Au-gust 21, 2025, concerning the Appointment of Members of the Nomination and Remu-neration Committee, resulting in the follow-ing composition:

March 26, 2025– October 8, 2025 Period

Name	Position	Term of Office	Position in the Bank
Omar Sjawaldy Anwar[1)]	Chairman [ACGS D.2.10, D.2.15]	March 26, 2025-present	President Commissioner/ Independent Commissioner
Tedi Bharata[2)]	Member	March 26, 2025-present	Vice President Commissioner
Suminto[3)]	Member	March 26, 2025-October 8, 2025	Commissioner
Didik Junaedi Rachbini[4)]	Member	March 26, 2025-present	Independent Commissioner
Vera Febyanthy[4)]	Member	March 26, 2025-present	Independent Commissioner
Donny Hutabarat[5)]	Member	March 26, 2025-present	Commissioner
Yenni Sari Dewi	Member	March 26, 2025-present	Human Capital Strategy Division Head

1) Effective as Chair of the Nomination and Remuneration Committee since June 30, 2025
2) Effective as Member of the Nomination and Remuneration Committee since June 5, 2025
3) Effective as a Member of the Nomination and Remuneration Committee since August 13, 2025 until October 8, 2025.
4) Effective as a Member of the Nomination and Remuneration Committee since August 13, 2025
5) Effective as a Member of the Nomination and Remuneration Committee since October 16, 2025

October 8, 2025 – December 31, 2025 Period

Name	Position	Term of Office	Position in the Bank
Omar Sjawaldy Anwar[1)]	Chairman [ACGS D.2.10, D.2.15]	March 26, 2025-present	President Commissioner/ Independent Commissioner
Tedi Bharata[2)]	Member	March 26, 2025-present	Vice President Commissioner
Didik Junaedi Rachbini[3)]	Member	March 26, 2025-present	Independent Commissioner
Vera Febyanthy[3)]	Member	March 26, 2025-present	Independent Commissioner
Donny Hutabarat[4)]	Member	March 26, 2025-present	Commissioner

Name	Position	Term of Office	Position in the Bank
Yenni Sari Dewi	Member	March 26, 2024-present	Human Capital Strategy Division Head

1) Effective as Chair of the Nomination and Remuneration Committee since June 30, 2025
2) Effective as Member of the Nomination and Remuneration Committee since June 5, 2025
3) Effective as a Member of the Nomination and Remuneration Committee since August 13, 2025 until October 8, 2025.
4) Effective as a Member of the Nomination and Remuneration Committee since August 13, 2025

NOMINATION AND REMUNERATION COMMITTEE PROFILE

More detailed information about the profiles of the members of the Nomination and Re-muneration Committee as members of the Bank's Board of Commissioners can be found in the Company Profile chapter, sub-chapter Board of Commissioners Profile, in this An-nual Report. The following is a brief profile of the members of BNI's Nomination and Re-muneration Committee as of December 31, 2025.

Chairman of the Nomination and Remuneration Committee

Omar Sjawaldy Anwar	
Legal Basis of Appointment	Board of Commissioners of BNI Decree No. KEP/024/DK/2025 dated September 19, 2025
Term of Office	March 26, 2025 – present
Professional Certication	Risk Management Certification Level 6 (Non-tiered)
Complete Profile	His profile is described in the Company Profile Chapter, Sub-chapter Board of Commissioners Profile.

Member of the Nomination and Remuneration Committee as Board of Commissioners

Tedi Bharata **Vice President Commissioner**	
Legal Basis of Appointment	Board of Commissioners of BNI Decree No. KEP/024/DK/2025 dated September 19, 2025
Term of Office	March 26, 2025 – present
Professional Certication	Risk Management Certification Level 6 (Non-tiered)
Complete Profile	His profile is described in the Company Profile Chapter, Sub-chapter Board of Commissioners Profile.

Didik Junaedi Rachbini **Independent Commissioner**	
Legal Basis of Appointment	Board of Commissioners of BNI Decree No. KEP/024/DK/2025 dated September 19, 2025
Term of Office	March 26, 2025 – present
Professional Certication	Risk Management Certification Level 6 (Non-tiered)
Complete Profile	His profile is described in the Company Profile Chapter, Sub-chapter Board of Commissioners Profile.

Vera Febyanthy **Independent Commissioner**	
Legal Basis of Appointment	Board of Commissioners of BNI Decree No. KEP/024/DK/2025 dated September 19, 2025
Term of Office	March 26, 2025 – present
Professional Certication	Risk Management Certification Level 6 (Non-tiered)
Complete Profile	His profile is described in the Company Profile Chapter, Sub-chapter Board of Commissioners Profile.

Member of the Nomination and Remuneration Committee from the Independent Party



Yenni Sari Dewi
Member of Nomination and Remuneration Committee

Age
47 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor's Degree in Nutrition and Animal Feed from Universitas Gadjah Mada (2000)
- Master's Degree in General Business from Universitas Gadjah Mada (2003)

Legal Basis of Appointment
Appointed for the first time as Member of the Nomination and Remuneration Committee on May 26, 2023 based on Board of Commissioners Decree No. KEP/002/DK/2023 dated May 26, 2023

Term of Office
2023-saat ini

Professional Certification and/or Training
1. Star Track Executive Development Program. Stream: Strategic Human Resources Leadership, Cornell University, October - December 2025.
2. Future of Work: Leading Modern Workplaces – The Wharton School, November 25, 2025.
3. Executive Training – From Capable to Exceptional, Impact Executive Education, April 25, 2025
4. Risk Management Certification Maintenance Level 6, BSMR, December 1, 2025.
5. Other developments:
   - Mandatory e-learning courses on PDP, security awareness, APUPPT, anti-fraud awareness, good corporate governance, risk culture, and sustainability finance.
   - LinkedIn Learning courses on topics such as cybersecurity, strategic agility, learning with innovation in the age of AI, operational excellence foundation, and more.
   - **Webinars on risk management and sustainability disclosure.**

Work Experience
- Head of Management & Organization Research Group– Strategic Planning Division (2015-2020),
- Dean of Leadership & Future Capability Academy – BNI Corporate University (2020-2021)
- Deputy Head of Strategy & Policy Division – Human Capital Strategy Division (2021-2023)
- Head of Human Capital Strategy Division at PT Bank Negara Indonesia (Persero), Tbk (2023 - present)

Concurrent Position
Head of Human Capital Strategy Division at PT Bank Negara Indonesia (Persero), Tbk

QUALIFICATIONS, EDUCATION, AND WORK EXPERIENCE OF THE NOMINATION AND REMUNERATION COMMITTEE

The membership requirements for BNI's Nomination and Remuneration Committee are as follows:
1. Possess high integrity, adequate capability, knowledge, and work experience in the Committee's areas of responsibility, as well as an understanding of the banking sector.
2. Have no personal interests or affiliations that could create negative impacts or conflicts of interest with the company.
3. Be able to allocate sufficient time to fulfill their duties.
4. Demonstrate strong collaboration and effective communication skills.

In addition to meeting the requirements as described above, all members of the Nomination and Remuneration Committee who are Independent Parties must meet the following additional criteria:
1. Have no affiliation, financial, managerial, ownership, or family relationships with members of the Board of Commissioners, the Board of Directors, and/or holders of BNI's Series A Dwiwarna shares, or any other relationships with BNI that may affect their ability to act independently. The definition of an independent party in this charter follows the applicable regulations governing independent committee members under the Board of Commissioners, particularly the Financial Services Authority (OJK) Circular Letter on Governance Implementation for Commercial Banks and the OJK Regulation on the Nomination and Remuneration Committee for Issuers or Public Companies.
2. Have relevant experience in nomination and/or remuneration.
3. Not be an employee of BNI.
4. Not hold concurrent positions as:
   a. A member of the Board of Commissioners/ Supervisory Board in a State-Owned Enterprise (SOE) or other company.
   b. A secretary or staff member of the Board of Commissioners/Supervisory Board in an SOE or other company.
   c. A member of any other committee within the company.
5. The executive officer overseeing human resources must have knowledge of remuneration and/or nomination systems and the bank's succession planning.
6. BNI must verify the accuracy of all documents or supporting data related to the independent status requirements, including a personal integrity statement from the independent party.

By adhering to both the general and specific requirements outlined in the Nomination and Remuneration Committee Charter, the Bank ensures that the current Chair and all members of the Committee meet the educational qualifications and work experience criteria, as detailed in the table below:

Educational Qualifications, Work Experience, and Areas of Expertise of the Nomination and Remuneration Committee as of December 31, 2025

Nama	Position	Education	Work Experience	Areas of Expertise
Omar Sjawaldy Anwar	Chairman [ACGS D.2.10, D.2.15]	Work experience can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting • Strategic Management • Finance • Technology
Tedi Bharata	Member	Work experience can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Public Administration • Finance • Human Resource Management • Information Management & Computer Systems
Didik Junaedi Rachbini	Member	Work experience can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economy
Vera Febyanthy	Member	Work experience can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Public Administration • Public Policy • Finance
Donny Hutabarat	Anggota	Riwayat Pengalaman Kerja Beliau dapat dilihat pada bagian Keberagaman Komposisi Dewan Komisaris	Riwayat Pengalaman Kerja Beliau dapat dilihat pada bagian Keberagaman Komposisi Dewan Komisaris	• Ekonomi • Market & Treasury
Yenni Sari Dewi	Member	• Bachelor of Nutrition & Animal Feed from Gadjah Mada University (2000); and • Master of General Business from Gadjah Mada University (2003).	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Management Economics; and • Organizational Management and Human Resources.

INDEPENDENCE STATEMENT OF THE NOMINATION AND REMUNERATION COMMITTEE

BNI ensures that all members of the Remu-neration and Nomination Committee who are independent parties have no financial, mana-gerial, share ownership, and/or family rela-tionships with the Board of Commissioners, Board of Directors, or Controlling Sharehold-ers. This reflects the Remuneration and Nom-ination Committee's commitment to uphold-ing the principles of GCG and maintaining integrity in the Bank's nomination and remu-neration oversight process. All members of the Nomination and Remuneration Com-mittee have signed a statement of independ-ence in accordance with the provisions of OJK Regulation No. 17 of 2023 concerning the Implementation of Corporate Governance for Commercial Banks.

Nomination and Remuneration Committee Independency

Name	Independency Aspects				
	No financial relationships with the Board of Commissioners and the Board of Directors	No management relationships in BNI, subsidiaries or affiliated companies	No share ownership relationship in BNI	No familial relationships with the Board of Commissioners, the Board of Directors, and/or fellow members of the Nomination and Remuneration Committee	Not serving on the board of political party or government official
Omar Sjawaldy Anwar	√	√	√	√	√
Tedi Bharata	√	√	√	√	√
Didik Junaedi Rachbini	√	√	√	√	√
Donny Hutabarat	√	√	√	√	√
Vera Febyanthy	√	√	√	√	√
Yenni Sari Dewi	√	√	√	√	√

CONCURRENT POSITIONS INFORMATION

As a form of transparency and accountability, BNI openly discloses information regarding the concurrent positions held by each mem-ber of the Nomination and Remuneration Committee. This information is presented in full in the following table:

Name	Position in the Bank	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	None	None	None
Tedi Bharata	Vice President Commissioner	None	None	None
Didik Junaedi Rachbini	Independent Commissioner	None	√	None
Donny Hutabarat	Commissioner	None	None	None
Vera Febyanthy	Independent Commissioner	None	None	None
Yenni Sari Dewi	Human Capital Strategy Division Head	None	None	None

NOMINATION AND REMUNERATION COMMITTEE MEETINGS [ACGS D.2.12, D.2.17]

Meeting Policy

The Nomination and Remuneration Committee Charter clearly regulates the policies and procedures for conducting BNI Nomination and Remuneration Committee Meetings, including the following matters:

1. Meetings of the Nomination and Remuneration Committee are held as needed by the Bank, with a minimum of four meetings per year.
2. The Nomination and Remuneration Committee Meeting may only be held if attended by a majority of the members of the Nomination and Remuneration Committee and of the majority, one is the Chairperson of the Nomination and Remuneration Committee and 1 (one) Executive Officer in charge of Human Resources or a party holding a managerial position under the Board of Directors in charge of human resources.
3. Meetings are chaired by the Chairperson of the Nomination and Remuneration Committee. If the Chairperson is unable to attend, the meeting is led by the most senior committee member designated/agreed upon in the meeting.
4. Decision-making at the Nomination and Remuneration Committee meeting is based on consensus. In the event that consensus is not reached, decision-making is based on majority vote with the principle of 1 (one) person 1 (one) vote.
5. If in the decision-making process carried out by voting there are an equal number of votes, then the decision is taken based on the majority vote with the principle of 1 (one) person 1 (one) vote, without counting the votes of members who are Human Resources Executive Officers or parties who hold managerial positions under the Board of Directors who are in charge of human resources.

6. The results of the Nomination and Remuneration Committee meetings are recorded in minutes of the meeting, signed by all committee members, and properly documented.
7. Any dissenting opinions expressed in the meeting must be clearly recorded in the minutes, along with the reasons for the disagreement.
8. The minutes of the meeting, as referred to in point 6 above, are submitted in writing by the Nomination and Remuneration Committee to the Board of Commissioners.
9. The attendance of Nomination and Remuneration Committee members in meetings is reported in the committee's quarterly and annual reports.

Meeting Frequency and Attendance Rate of the Nomination and Remuneration Committee Members

Throughout 2025, the BNI Nomination and Remuneration Committee held 12 (twelve) meetings. During the period from March 26, 2025 to June 5, 2025, the Nomination & Remuneration Committee was unable to hold meetings due to the absence of effective members of the Nomination & Remuneration Committee (both the Chair and members of the Nomination & Remuneration Committee) as they were still taking the OJK Fit & Proper Test. However, during that period, the Nomination & Remuneration Committee held one internal consolidation and discussion with the relevant directors to provide orientation and in-depth information on BNI's condition in preparation for carrying out the duties and functions of the Nomination and Remuneration Committee. The frequency of these meetings has met the provisions stipulated in the Charter of the Nomination and Remuneration Committee. The following is the attendance data of the members of the BNI Nomination and Remuneration Committee in these meetings throughout 2025, which reflects the level of participation and commitment of members in carrying out their supervisory duties and responsibilities effectively and consistently.

Name	Position	Number of Meetings [ACGS D.2.12, D.2.17]	Attended [ACGS D.2.12, D.2.17]	Percentage [ACGS D.2.12, D.2.17]
Pradjoto[1)]	Chairman	3	3	100%
Pahala Nugraha Mansury[3)]	Member	6	5	83%
Sigit Widyawan[3)]	Member	6	6	100%
Askolani[3)]	Member	6	5	83%
Asmawi Syam[2)]	Member	3	3	100%
Iman Sugema[2)]	Member	3	3	100%
Septian Hario Seto[2)]	Member	3	3	100%
Erwin Rijanto Slamet[3)]	Member	6	6	100%
Fadlansyah Lubis[3)]	Member	6	6	100%
Robertus Billitea[3)]	Member	6	4	67%
Mohamad Yusuf Permana[3)]	Member	6	6	100%
Danni Tri Suryani[3)]	Independent Member	9	9	100%
Omar Sjawaldy Anwar[4)]	Chairman [ACGS D.2.10, D.2.15]	5	4	80%
Tedi Bharata[5)]	Member	5	4	80%
Suminto[6)]	Member	3	2	67%
Didik Junaedi Rachbini[7)]	Member	3	3	100%
Vera Febyanthy[7)]	Member	3	3	100%
Donny Hutabarat[8)]	Member	1	1	100%
Yenni Sari Dewi	Member	12	12	100%

1) Effectively serving as Chair of the Nomination and Remuneration Committee until February 20, 2025, in connection with the expiration of his term as a member of the Board of Commissioners, 5 (five) years from the date of appointment.
2) Effectively serving as a Member of the Nomination and Remuneration Committee until February 20, 2025, in connection with the expiration of his term as a member of the Board of Commissioners, 5 (five) years from the date of appointment.
3) Effective serving as Member of the Nomination and Remuneration Committee until March 26, 2025.
4) Effective serving as Member of the Nomination and Remuneration Committee starting June 30, 2025.
5) Effective serving as Member of the Nomination and Remuneration Committee starting June 5, 2025.
6) Effective serving as Member of the Nomination and Remuneration Committee starting August 13, 2025 and ending on October 8, 2025.
7) Effective serving as Member of the Nomination and Remuneration Committee starting August 13, 2025.
8) Effective serving as Member of the Nomination and Remuneration Committee starting October 16, 2025.

Meeting Agenda

In 2025, the Nomination and Remuneration Committee held 12 (twelve) meetings, consisting of 8 (eight) meetings related to Nomination and 4 (four) meetings related to Remuneration with the following agenda:

No.	Meeting Dates	Meeting Agenda	Members of the Nomination & Remuneration Committee	Invitee	Category
1	February 11, 2025	• Agenda I – Discussion on Talent Development Policy and Plan • Agenda II – Discussion on the Board of Commissioners Development Program	1. Pradjoto; 2. Pahala Nugraha Mansury; 3. Sigit Widyawan; 4. Asmawi Syam; 5. Iman Sugema; 6. Septian Hario Seto; 7. Erwin Rijanto Slamet; 8. Fadlansyah Lubis; 9. Mohamad Yusuf Permana; 10. Danni Tri Suryani; 11. Yenni Sari Dewi	Director of Human Capital & Compliance; SEVP Human Capital	Nomination
2	February 11, 2025	One-on-One Meeting with BNI Nominated Talents	1. Pradjoto; 2. Pahala Nugraha Mansury; 3. Sigit Widyawan; 4. Askolani; 5. Asmawi Syam; 6. Iman Sugema; 7. Septian Hario Seto; 8. Erwin Rijanto Slamet; 9. Fadlansyah Lubis; 10. Robertus Billitea; 11. Mohamad Yusuf Permana; 12. Danni Tri Suryani; 13. Yenni Sari Dewi	All 2025 Nominated Talents	Nomination
3	February 18, 2025	• Agenda I – Discussion on the Collective and Individual KPI Achievement of the Board of Directors for 2024 • Agenda II – Internal Meeting of the Board of Commissioners / NRC prior to One-on-One Meetings with Directors • Agenda III – One-on-One Meeting on Directors' KPI Achievement for 2024 • Agenda IV – Internal Meeting of the BoC / NRC One-on-One Meeting with Directors	1. Pradjoto; 2. Sigit Widyawan; 3. Askolani; 4. Asmawi Syam; 5. Iman Sugema; 6. Septian Hario Seto; 7. Erwin Rijanto Slamet; 8. Fadlansyah Lubis; 9. Mohamad Yusuf Permana; 10. Danni Tri Suryani; 11. Yenni Sari Dewi	All directors	Remuneration
4	February 27, 2025	Discussion on the Willis Towers Watson Study Report and the Proposed Remuneration for the Board of Directors and Board of Commissioners for 2025	1. Pahala Nugraha Mansury; 2. Sigit Widyawan; 3. Askolani; 4. Erwin Rijanto Slamet; 5. Fadlansyah Lubis; 6. Robertus Billitea; 7. Mohamad Yusuf Permana; 8. Danni Tri Suryani; 9. Yenni Sari Dewi	Director of Human Capital & Compliance	Remuneration
5	March 20, 2025	• Discussion on the Appointment of the Management and Supervisory Board of BNI Ventures • Discussion on the Request for Approval to Amend Pension Fund Regulations	1. Pahala Nugraha Mansury; 2. Sigit Widyawan; 3. Askolani; 4. Erwin Rijanto Slamet; 5. Fadlansyah Lubis; 6. Robertus Billitea; 7. Mohamad Yusuf Permana; 8. Danni Tri Suryani; 9. Yenni Sari Dewi	Director of Human Capital & Compliance; Director of Finance; SEVP Human Capital	Nomination

No.	Meeting Dates	Meeting Agenda	Members of the Nomination & Remuneration Committee	Invitee	Category
6	March 26, 2025	Discussion on the Proposal of Series A Dwiwarna Shareholders regarding Changes in the Company's Management in the context of the Annual General Meeting of Shareholders for Fiscal Year 2024 of PT Bank Negara Indonesia (Persero) Tbk	1. Pahala Nugraha Mansury; 2. Sigit Widyawan; 3. Askolani; 4. Erwin Rijanto Slamet; 5. Fadlansyah Lubis; 6. Robertus Billitea; 7. Mohamad Yusuf Permana; 8. Danni Tri Suryani; 9. Yenni Sari Dewi	Ministry of SOEs as Series A Dwiwarna Shareholder	Nomination
7	June 3, 2025	Discussion on the Development Program for the Board of Commissioners and its Committees	1. Omar Sjawaldy Anwar; 2. Tedi Bharata; Suminto; 3. Didik Junaedi Rachbini; 4. Vera Febyanthy; 5. Danni Tri Suryani; 6. Yenni Sari Dewi	Director of Human Capital & Compliance; SEVP Human Capital	Nomination
8	July 8, 2025	Branch Productivity as the Impact of Branch & Human Capital Transformation	1. Omar Sjawaldy Anwar; 2. Tedi Bharata; Suminto; 3. Didik Junaedi Rachbini; 4. Vera Febyanthy; 5. Danni Tri Suryani; 6. Yenni Sari Dewi	Director of Human Capital & Compliance; Director of Finance; Director of Network & Retail Funding; SEVP Human Capital	Remuneration
9	July 10, 2025	Evaluation of the Implementation of Internal Talent Development and the Policy on Outsourced Workforce Management	1. Omar Sjawaldy Anwar; 2. Tedi Bharata; Suminto; 3. Didik Junaedi Rachbini; 4. Vera Febyanthy; 5. Danni Tri Suryani; 6. Yenni Sari Dewi	Director of Human Capital & Compliance; SEVP Human Capital	Nomination
10	August 12, 2025	• Agenda I – Integrated Human Capital IT Policy • Agenda II – Completion of Employee Data and People Analytics	1. Tedi Bharata; 2. Suminto; 3. Didik Junaedi Rachbini; 4. Vera Febyanthy; 5. Yenni Sari Dewi	Director of Human Capital & Compliance; Director of Information Technology; SEVP Human Capital; SEVP Information Technology	Nomination
11	September 9, 2025	• Agenda I: Whistle Blowing System (WBS) Report related to Human Capital aspects. • Agenda II: Monitoring of employee discipline and employee cases.	1. Omar Sjawaldy Anwar, 2. Tedi Bharata, 3. Suminto, 4. Didik Junaedi Rachbini, 5. Vera Febyanthy, 6. Yenni Sari Dewi.	Director of Human Capital & Compliance, SEVP of Human Capital.	Remuneration
12	December 15, 2025	Discussion on the proposal from the Series A Dwiwarna Shareholder regarding changes to the Company's Management in the context of the Extraordinary General Meeting of Shareholders (EGMS) for Fiscal Year 2024 of PT Bank Negara Indonesia (Persero) Tbk.	1. Omar Sjawaldy Anwar, 2. Tedi Bharata, 3. Suminto, 4. Didik Junaedi Rachbini, 5. Vera Febyanthy, 6. Yenni Sari Dewi.	Ministry of SOEs (BUMN) as the Series A Dwiwarna Shareholder.	Nomination

Internal consolidation and discussions conducted during this period did not involve any members of the Audit Committee (neither the Chair nor the Audit Committee Members) of the Board of Commissioners, as they were still undergoing the OJK Fit & Proper Test.

NOMINATION AND REMUNERATION COMMITTEE REPORTING

The Nomination and Remuneration Committee submits reports to the Board of Commissioners on every assignment given and/or on any issues deemed to require the Board of Commissioners' attention, at least four (4) times a year, or more frequently if necessary based on special assignments or the identification of strategic issues requiring the Board's attention. The reports are subsequently submitted in written form and discussed at meetings of the Board of Commissioners, either directly or through written documentation. All reporting documentation must be properly filed in the Company's official archives for audit and corporate governance evaluation purposes.

COMPETENCY ENHANCEMENT PROGRAM FOR MEMBERS OF THE NOMINATION AND REMUNERATION COMMITTEE IN 2025

Throughout 2025, all members of the Nomi-nation and Remuneration Committee partici-pated in various education and training pro-grams aimed at enhancing their understand-ing and competencies in carrying out their duties and responsibilities efficiently, trans-parently, independently, and accountably, particularly in supervising and providing rec-ommendations regarding nomination and remuneration policies for the Board of Com-missioners, the Board of Directors, and exec-utives, thereby strengthening the implemen-tation of good corporate governance.

The details of training activities attended by each member of the Nomination and Remu-neration Committee throughout 2025 are as follows:

Name of Training/Workshop/ Conference/Seminar	Implementation Time	Organizer
Omar Sjawaldy Anwar - Chairman of the KNR/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Tedi Bharata - KNR Member/Vice President Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Didik Junaedi Rachbini – KNR Member/Independent Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Vera Febyanthy – KNR Member/Commissioner		
Competency development/training can be found in Section of the Training and/or Competency Improvement of Board of Commissioners Members in 2025.		
Yenni Sari Dewi - KNR Member/Human Capital Strategy Division Head		
Competency development/training can be found in Certification and/or Training Human Capital Division Head		

NOMINATION AND REMUNERATION COMMITTEE KPI ACHIEVEMENT IN 2025

The performance assessment of the Nomi-nation and Remuneration Committee is con-ducted based on the KPIs that were mutually agreed upon at the beginning of the year as benchmarks for performance achievement. In 2025, the Nomination and Remuneration Committee held 12 (twelve) meetings against the target of 4 (four) meetings as stipulated. This achievement reflects the Committee's success in carrying out its duties and respon-sibilities, including assisting the Board of Commissioners in performing its supervisory function and providing recommendations re-lated to the determination of nomination and remuneration policies, salary recommenda-tions, as well as the performance evaluation of the Board of Commissioners and the Board of Directors.

WORK PROGRAM AND IMPLEMENTATION OF DUTIES OF THE NOMINATION AND REMUNERATION COMMITTEE IN 2025

In 2025, the Nomination and Remuneration Committee submitted a report on the implementation of its duties and responsibilities to the Board of Commissioners and provided several recommendations, including the following:

1. Talent Development Policy related to the BUMN Talent Pool
2. Outsourcing Workforce Management Policy & Procedures
3. Remuneration of the Board of Directors and Board of Commissioners in 2024
4. Target KPI of the Board of Directors in 2025 (including the KPI of the Collegial Board of Directors in 2025)

5. Proposal for Nominated Talent in 2025
6. Proposal for Subsidiary Management
7. Sanctions Policy
8. Changes to Pension Fund Regulations
9. Restructuring of the Board of Directors Organization (Directorate Division) of BNI
10. Changes to Allowances and Facilities for members of the Board of Directors and Board of Commissioners
11. Employee Remuneration
12. Proposed performance targets promised for the next 3 years related to Long Term Incentives (LTI) and discussion of governance LTI
13. Internal talent and employee development
14. Proposed KPI of the Board of Directors Collegiate in 2025

EVALUATION OF THE NOMINATION AND REMUNERATION COMMITTEE ON THE IMPLEMENTATION OF THE NOMINATION AND REMUNERATION POLICY AT THE BANK

The Nomination and Remuneration Com-mittee consistently conducts evaluations of the implementation of nomination and re-muneration policies within BNI to ensure alignment with business strategy, prevailing regulations, and the principles of good corpo-rate governance. In 2025, such evaluations were carried out comprehensively by as-sessing the adequacy of the policies, the effectiveness of their implementation, and their conformity with market conditions and best practices in the banking industry. The results of these evaluations were subse-quently used as the basis for the Nomination and Remuneration Committee in providing recommendations to the Board of Commis-sioners regarding improvements and en-hancements to nomination and remuneration policies.

NOMINATION AND REMUNERATION COMMITTEE WORK PLAN FOR 2026

The Nomination and Remuneration Committee has set a work plan for 2026 with the following strategic priorities:

1. Internalization of Performance Culture and Branch Productivity as an impact of Human Capital and Branch Transformation
2. Talent Development Plan
3. Remuneration of the Board of Directors, Board of Commissioners, and Employees
4. IT Human Capital Policy
5. People Analytics
6. Evaluation of Collegial and Individual KPI Achievement of the Board of Directors
7. Evaluation of Prospective Directors and Prospective Board of Commissioners of SOEs
8. Evaluation of Prospective Directors and Prospective Board of Commissioners of Subsidiaries

REMUNERATION OF MEMBERS OF THE NOMINATION AND REMUNERATION COMMITTEE [ACGS C.3.4]

The honorarium for members of the Nomi-nation and Remuneration Committee who also serve as members of the Board of Commissioners is included as part of the overall honorarium of the Board of Commis-sioners; therefore, no separate honorarium is provided. Meanwhile, for Committee mem-bers from independent parties (non-Commissioners), the Board of Commission-ers determines the honorarium at a maxi-mum amount of 20% of the President Direc-tor's salary, without any additional income. This policy is in line with the provisions of the Minister of State-Owned Enterprises Regula-tion No. PER-3/MBU/03/2023 concerning the Organs and Human Resources of State-Owned Enterprises.

RISK MONITORING COMMITTEE
[ACGS (B).D.6.1]

The Board of Commissioners has established the Risk Monitoring Committee to support the execution of its supervisory duties, par-ticularly in providing guidance and advice to the Board of Directors. Through this Com-mittee, the Bank ensures that its risk man-agement framework, procedures, and meth-odologies remain robust and adequate, so that the implementation of risk management is consistently aligned with applicable stand-ards and methodologies as well as with Good Corporate Governance (GCG) principles. The existence of the Risk Monitoring Committee plays a vital role in ensuring that the Bank's business activities are conducted within ac-ceptable risk limits while optimizing oppor-tunities in line with the Bank's strategic ob-jectives. This role ensures that business op-erations are carried out in a controlled man-ner, supporting sustainable growth and main-taining the Bank's long-term stability.

LEGAL BASIS FOR THE ESTABLISHMENT OF THE RISK MONITORING COMMITTEE

The establishment of the Risk Monitoring Committee refers to the following regulations:

1. Financial Services Authority Regulation No. 17 of 2023, dated September 14, 2023, on Governance Implementation for Commercial Banks.
2. Financial Services Authority Circular Letter No. 13/SEOJK.03/2017, dated March 17, 2017, on Governance Implementation for Commercial Banks.
3. Regulation of the Minister of State-Owned Enterprises (SOEs) of the Republic of Indonesia No. PER-3/MBU/03/2023, dated March 20, 2023, on SOE Organizations and Human Resources.

4. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-2/MBU/03/2023, dated March 3, 2023, on SOE Governance Guidelines and Significant Corporate Activities.
5. Decree of the Deputy for Finance and Risk Management, Ministry of SOEs No. SK-3/DKU. MBU/05/2023, dated May 26, 2023, on Technical Guidelines for the Composition and Qualifications of Risk Management Bodies within SOEs.
6. Bank Indonesia and Financial Services Authority regulations on Risk Management Implementation for Commercial Banks and Integrated Risk Management for Financial Conglomerates.
7. the Company's Articles of Association.
8. Articles of Association of PT Bank BNI (Persero) Tbk and its amendments.
9. Board of Commissioners Decree No. Kep/002/DK/2004, dated March 1, 2004, on the Establishment of the Risk and Compliance Committee.

RISK MONITORING COMMITTEE CHARTER

The BNI Risk Monitoring Committee has prepared a Risk Monitoring Committee Charter, which was established through the Board of Commissioners' Decree No. KEP/023/DK/2025 dated 19 September 2025 concerning the Risk Monitoring Committee Charter of PT Bank Negara Indonesia (Persero) Tbk. This Charter is binding and serves as the principal basis for determining the direction, responsibilities, and working procedures of the Risk Monitoring Committee at BNI. The scope of work of the Risk Monitoring Committee is clearly defined, covering its authorities, duties, meeting mechanisms, and reporting of work results to the Board of Commissioners.

With this Charter, each member of the Risk Monitoring Committee shall be able to carry out their supervisory functions effectively and provide constructive views and recommendations to the Board of Commissioners in order to support the enhancement of the Bank's risk management quality. The Risk Monitoring Committee Charter includes, among others:

1. The foundation for the establishment and duties of the Risk Monitoring Committee.
2. The objectives of the Risk Monitoring Committee.
3. The structure and membership of the Risk Monitoring Committee.
4. Membership requirements for the Risk Monitoring Committee.
5. Duties of the Risk Monitoring Committee.
6. Authorities of the Risk Monitoring Committee.
7. Rights and obligations of the Risk Monitoring Committee.
8. Meetings of the Risk Monitoring Committee, and
9. The tenure of Risk Monitoring Committee members.

The BNI Risk Monitoring Committee Charter is evaluated and updated regularly to ensure that it remains relevant and in line with business developments, increased risk profiles, and current corporate governance aspects. The latest update was carried out on September 19, 2025, and has been published on the official BNI website (https://www.bni.co.id/Portals/1/BNI/Perusahaan/Docs/KPR-Piagam-Komite-Pemantau-Risiko-Tahun-2025.pdf). This step was taken as part of the Bank's commitment to transparency and openness of information to all stakeholders.

DUTIES AND RESPONSIBILITIES OF THE RISK MONITORING COMMITTEE

The duties and responsibilities of the BNI Risk Monitoring Committee as stipulated in the Risk Monitoring Committee Charter are as follows:

1. Evaluating the alignment between risk management policies and their implementation, specifically:
   a. Assessing the consistency between the Bank's risk management policies and their execution, covering credit risk, market risk, liquidity risk, operational risk, strategic risk, legal risk, compliance risk, and reputational risk.
   b. Reviewing the alignment of integrated risk management policies with their implementation, encompassing the eight risks mentioned above, along with insurance risk and intra-group transaction risk.
   c. Providing recommendations to the Board of Commissioners on the adequacy of risk management policies and their implementation to ensure effective risk control.
   d. Reviewing and providing opinions to the Board of Commissioners on the General Credit Policy and other regulatory-required policies submitted by the Board of Directors for approval.
2. Monitoring and evaluating the performance of the risk management committee and the risk management unit to provide recommendations to the Board of Commissioners, including:
   a. Monitoring the execution of the Risk Management Unit's work plan and the duties of the Risk Management Committee.
   b. Monitoring the implementation of the Integrated Risk Management Unit's work plan and the duties of the Integrated Risk Management Committee.

c. Recommending improvements to the effectiveness of risk management at BNI, including the integrated risk management with its subsidiaries.
d. Evaluating and reporting regulatory risk assessments to the Board of Commissioners.

3. Carrying out other specific duties related to the functions and scope of the Risk Monitoring Committee as assigned by the Board of Commissioners.

AUTHORITIES OF THE RISK MONITORING COMMITTEE

To support the implementation of supervisory duties over the Bank's risk management, the Risk Monitoring Committee is delegated a number of authorities, as follows:

1. Accessing records or information related to employees, funds, assets, and other resources of BNI relevant to its duties, with a written report submitted to the Board of Commissioners.
2. Conducting random tests and inspections of BNI branches, representative offices, regional offices, and business units as necessary.
3. Communicate directly with parties related to the duties of the Risk Monitoring Committee, including communicating matters related to financial and management information.
4. Collaborating with the Risk Management Committee, Integrated Risk Management Committee, Risk Management Unit, and other relevant units.

HAK DAN KEWAJIBAN KOMITE PEMANTAU RISIKO

The Risk Monitoring Committee Charter outlines the rights and obligations of all members of the Risk Monitoring Committee, with the following details:

1. Performing duties in accordance with the Risk Monitoring Committee Charter.
2. Independent committee members are entitled to honorariums from BNI, the amount of which determined by the Board of Commissioners in compliance with applicable regulations.
3. Maintaining the confidentiality of all documents, data, and information related to the Risk Monitoring Committee activities.
4. Preparing and submitting the Annual Work Plan and Budget to the Board of Commissioners before the start of the financial year, a copy of which is submitted by the Board of Commissioners to the Board of Directors for their information. The implementation of the Risk Monitoring Committee's Annual Work Plan and Budget is reported to the Board of Commissioners.
5. Prepare and submit a report to the Board of Commissioners signed by the Committee Chairperson and Committee Members as follows:
   a. Reports on the execution of duties, with recommendations if necessary.
   b. Quarterly and annual reports.
6. Reporting to the General Meeting of Shareholders (GMS) through the Board of Commissioners regarding responsibilities, achievements, and other relevant matters.
7. Prohibited from accepting gifts or benefits related to their position.
8. Allocating sufficient time to fulfill their duties effectively.
9. In order to avoid overlapping implementation of tasks among the committees under the Board of Commissioners and cooperation in implementing tasks, the Risk Monitoring Committee is required to coordinate with other Committees under the Board of Commissioners.

APPOINTMENT, DISMISSAL, AND TERM OF OFFICE OF THE RISK MONITORING COMMITTEE MEMBERS

The term of office of members of the Risk Monitoring Committee who are members of the Board of Commissioners is the same as their term of office as members of the Board of Commissioners and ends at the same time as that term. With this provision, members of the Risk Monitoring Committee who are members of the Board of Commissioners au-tomatically resign from the Committee when their term of office as members of the Board of Commissioners ends. In practice, if the chair of the Committee resigns before the end of their term of office, the position of Chair shall be replaced by another Independ-ent Commissioner. Members of the Com-mittee from independent parties have a max-imum term of office of 3 (three) years and may be extended once for 2 (two) years, bringing the total maximum term of office to 5 (five) years, without prejudice to the Board of Commissioners' right to dismiss them at any time.

Taking into account the recommendation of the Chair of the Risk Monitoring Committee, the Board of Commissioners has the authori-ty to dismiss independent Committee mem-bers at any time if they are deemed unable to carry out their duties and obligations in accordance with the provisions of the ap-pointment decree or employment agree-ment, as well as applicable regulations. If the Chair of the Risk Monitoring Committee re-signs as a member of the Board of Commis-sioners, the replacement of the Chair of the Committee must be carried out by other members of the Board of Commissioners no later than 30 (thirty) days.

STRUCTURE, MEMBERSHIP, AND EXPERTISE OF THE RISK MONITORING COMMITTEE

The requirements and criteria for the composition and membership of the BNI Risk Monitoring Committee are outlined as follows:

1. The Risk Monitoring Committee is formed based on the decision of the Board of Commissioners meeting and is placed in a Decree of the Board of Commissioners.
2. The Risk Monitoring Committee is under the coordination of the Board of Commissioners and is directly responsible to the Board of Commissioners.
3. The appointment of Risk Monitoring Committee Members is carried out by the Board of Directors based on the Decision of the Board of Commissioners Meeting.
4. The membership of the Risk Monitoring Committee consists of at least:
   a. 1 (one) Independent Commissioner who also serves as chairman
   b. 1 (one) person from an independent party who has expertise in the field of risk management
   c. 1 (one) person from an independent party who has expertise in the field of finance
   d. Committee members who are not members of the Board of Commissioners/Supervisory Board of BUMN are a maximum of 2 (two) people, where one of the committee members has knowledge and/or expertise in the field of risk management
   e. The expertise of the Independent Party as referred to in points b) and c) above is proven by having a risk management certificate as applicable to the Board of Directors and having a competency certificate that supports the implementation of the functions and responsibilities of the committee.
5. Independent commissioners and independent parties who are members of the Risk Monitoring Committee must be at least 50% (fifty per hundred) of the total number of members of the Risk Monitoring Committee.
6. The Chairperson of the Risk Monitoring Committee is an Independent Commissioner who also serves as a member as determined in a decision of the Board of Commissioners meeting, and is positioned in a Decree of the Board of Commissioners.
7. The Chairperson of the Risk Monitoring Committee may only serve as Chairperson of a Committee in a maximum of 1 (one) other Committee at BNI.
8. Former members of the Board of Directors and former executive officers of BNI or parties who have a relationship with BNI that can affect the ability to act independently who will become independent members of the Risk Monitoring Committee are required to undergo a cooling off period of at least 6 (six) months. The cooling off period provisions do not apply to former members of the Board of Directors and former executive officers of BNI whose duties are only to carry out supervisory functions for at least 6 (six) months. What is meant by the cooling off period is the cooling off period as regulated in the Regulations and Circulars of the Financial Services Authority concerning the Implementation of Governance for Commercial Banks in force.
9. Members of the Risk Monitoring Committee who come from independent parties are not permitted to hold concurrent positions as:
   a. Members of the Board of Commissioners/ Supervisory Board at State-Owned Enterprises (BUMN)/other companies;
   b. Secretary/staff of the Secretary of the Board of Commissioners/Supervisory Board at BUMN/ other companies.
   c. Other committee members at BNI; and/or
   d. Committee members at other state-owned enterprises/companies.
10. The Board of Directors carries out the appointment and dismissal of members of the Risk Monitoring Committee who come from independent parties based on the decision of the Board of Commissioners meeting and the Decree of the Board of Commissioners.
11. The Chairperson of the Risk Monitoring Committee has the right to propose the replacement of members of the Risk Monitoring Committee to the Board of Commissioners if one of the members of the Risk Monitoring Committee ends his/her term of office, resigns or is dismissed.
12. Members of the Risk Monitoring Committee are prohibited from coming from members of the Board of Directors of BNI or other banks. The Risk Monitoring Committee works collectively to carry out its duties to assist the Board of Commissioners.
13. The Risk Monitoring Committee is independent both in carrying out its duties and in reporting, and is directly responsible to the Board of Commissioners.
14. In carrying out its daily duties, the Committee may be assisted by staff from outside BNI or the Committee's secretary. The staff or Committee Secretary are appointed based on the decision of the Board of Commissioners Meeting and are listed in the Board of Commissioners' Decree.

NUMBER, COMPOSITION, AND COMPOSITION OF MEMBERSHIP OF THE RISK MONITORING COMMITTEE

As of December 31, 2025, the BNI Risk Monitoring Committee consists of three members appointed based on Board of Commissioners Decrees No. KEP/009/DK/2025 dated August 21, 2025, No. KEP/028/DK/2025 dated October 16, 2025, and No. KEP/026/DK/2025 dated October 1, 2025. Of these, 1 (one) person is an Independent Commissioner who also acts as the chair of the Committee, 1 (one) person is a Non-Independent Commissioner, and 1 (one) other person is an Independent Party who has competence and qualifications in the field of risk and financial management.

BNI ensures that the structure and composi-tion of the Risk Monitoring Committee in office as of December 31, 2025, complies with the provisions set forth in the Risk Moni-toring Committee Charter. The following is the composition of the BNI Risk Monitoring Committee members throughout 2025:

January 1, 2025 – March 26, 2025 Period

Name	Position	Term of Office	Period	Position in the Bank
Erwin Rijanto Slamet	Chairman	October 30, 2023-March 26, 2025	First	Independent Commissioner
Pahala Nugraha Mansury	Member	February 19, 2024-March 26, 2025	First	Vice President Commissioner
Fadlansyah Lubis	Member	December 29, 2022-March 26, 2025	First	Commissioner
Septian Hario Seto*)	Member	September 8, 2020-March 26, 2025	First	Independent Commissioner
Dwita Suherlina	Independent Member	January 18, 2021-December 18, 2025	Second	-
Bambang Setyogroho	Independent Member	June 1, 2022-September 30, 2025	Second	-

*) effectively serving as a member of the risk monitoring committee until February 20, 2025, in connection with the term of office as a member of the board of commissioners having expired 5 (five) years since the date of appointment

March 26, 2025 – September 30, 2025 Period

Name	Position	Term of Office	Period	Position in the Bank
Vera Febyanthy	Chairman	August 13, 2025-present	First	Independent Commissioner
Donny Hutabarat	Member	October 16, 2025-present	First	Commissioner
Suminto	Member	August 13, 2025-October 8, 2025	First	Commissioner
Dwita Suherlina	Independent Member	January 18, 2021-December 18, 2025	Second	-
Bambang Setyogroho	Independent Member	June 1, 2022-September 30, 2025	Second	-

October 1, 2025 – October 8, 2025 Period

Name	Position	Term of Office	Period	Position in the Bank
Vera Febyanthy	Chairman	August 13, 2025-present	First	Independent Commissioner
Donny Hutabarat	Member	October 16, 2025-present	First	Commissioner
Suminto	Member	August 13, 2025-October 8, 2025	First	Commissioner
Dwita Suherlina	Independent Member	January 18, 2021-December 18, 2025	Second	-
Retno Murwani	Independent Member	October 1, 2025-present	Second	-

October 9, 2025 – December 18, 2025 Period

Name	Position	Term of Office	Period	Position in the Bank
Vera Febyanthy	Chairman	August 13, 2025-present	First	Independent Commissioner
Dony Hutabarat	Member	October 16, 2025-present	First	Commissioner
Dwita Suherlina	Independent Member	January 18, 2021-December 18, 2025	Second	-
Retno Murwani	Independent Member	October 1, 2025-present	Second	-

December 18, 2025 – December 31, 2025 Period

Name	Position	Term of Office	Period	Position in the Bank
Vera Febyanthy	Chairman	August 13, 2025-present	First	Independent Commissioner
Donny Hutabarat	Member	October 16, 2025-present	First	Commissioner
Retno Murwani	Independent Member	October 1, 2025-present	Second	-

RISK MONITORING COMMITTEE PROFILES

More detailed information about the profiles of the Risk Monitoring Committee members as members of the Bank's Board of Commis-sioners can be found in the Company Profile chapter, sub-chapter Board of Commissioners Profile, in this Annual Report. The following is a brief profile of the members of BNI's Risk Monitoring Committee as of December 31, 2025:

Chair of the Risk Monitoring Committee

Vera Febyanthy	
Legal Basis of Appointment	BNI Board of Commissioners Decree No. KEP/009/DK/2025 dated August 21, 2025 concerning the Appointment of the Board of Commissioners as Members of the Risk Monitoring Committee.
Term of Office	August 13, 2025 - present.
Professional Certication	Risk Management Certification Level 6 Without Levels.
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Member of the Risk Monitoring Committee concurrently serving as a Commissioner

Donny Hutabarat	
Legal Basis of Appointment	Letter of the Board of Commissioners No. KEP/028/DK/2025 dated October 16, 2025 concerning the Appointment of Donny Hutabarat as a Member of the Risk Monitoring Committee.
Term of Office	October 16, 2025 - present
Professional Certication	Risk Management Certification Level 6 Without Levels.
Complete Profile	Profile can be found in the Board of Commissioners' profile section in the Company Profile chapter.

Risk Monitoring Committee from Independent Member



Retno Murwani
Risk Monitoring Committee Independent Member

Age
58 years old as of December 31, 2025

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
- Bachelor of Agriculture from Brawijaya University (1990)
- Master of Social Sciences from Gadjah Mada University (1992)

Legal Basis of Appointment
First appointed as a Member of the Risk Monitoring Committee on October 1, 2025, based on Board of Commissioners Decree No. KEP/026/DK/2025 dated October 1, 2025

Term of Office
October 1, 2025-present (First Term)

Professional Certification and/or Training
Risk Management Certification Level 7 from BSMR

Work Experience
- Deputy Head of Corporate Division 2 PT Bank Negara Indonesia (Persero) Tbk (2011-2012)
- VP Origination & Relationship – Local Corporate & Multinational Company Division 2 PT Bank Negara Indonesia (Persero) Tbk (2012-2013)
- Head of Corporate Remedial & Recovery Division PT Bank Negara Indonesia (Persero) Tbk (2014-2016)
- Head of Corporate Credit Risk Division at PT Bank Negara Indonesia (Persero) Tbk (2016-2020)
- Regional Head – Jakarta BSD at PT Bank Negara Indonesia (Persero) Tbk (2020-2021)
- Project Manager – Strategic Planning Division PT Bank Negara Indonesia (Persero) Tbk (2021)
- Head of Commercial Business Division 1 PT Bank Negara Indonesia (Persero) Tbk (2021-2022)
- Senior Credit Officer for Corporations & Large Commercial PT Bank Negara Indonesia (Persero) Tbk (2022-2023)
- Independent Member of the Risk Monitoring Committee at PT Bank Negara Indonesia (Persero) Tbk (2025-present)

Concurrent Position
No concurrent positions either internally at BNI or externally

QUALIFICATIONS, EDUCATION, AND WORK EXPERIENCE OF THE RISK MONITORING COMMITTEE

The following are the general and specific criteria that must be met in order to be appointed as chair and/or member of the BNI Risk Monitoring Committee:

1. General Requirements
   a. Have integrity, good character and morals and sufficient work experience related to the duties of other committees.
   b. Have no personal interests/connections that can have a negative impact and conflict of interest on BNI.
   c. Not currently having any bad credit/financing at any Financial Institution.

2. Competency Requirements
   a. Have adequate expertise, ability, knowledge and experience in the fields of economics, finance and banking or risk management in accordance with the requirements stipulated in the Financial Services Authority Regulation governing the requirements for members of the Risk Monitoring Committee.
   b. Be able to work together and have the ability to communicate well and effectively and provide sufficient time to carry out their duties.
   c. Have sufficient knowledge and understanding of laws and regulations in the fields of banking, Capital Markets, BUMN and other laws and regulations, especially those related to BNI's operational activities, implementation of GCG and risk management.

Transparency in the fulfillment of educational and work experience qualification criteria for the Chair and members of the BNI Risk Monitoring Committee is presented in the following table:

Educational Qualifications and Work Experience, and Fields of Expertise of the Risk Monitoring Committee

Name	Position	Education	Work Experience	Areas of Expertise
Vera Febyanthy	Chairman	Work experience can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Public Administration • Public Policy • Finance
Donny Hutabarat	Member	Work experience can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Economy • Market & Treasury
Retno Murwani	Member	• Bachelor of Agriculture from Brawijaya University • Master of Social Sciences from Gadjah Mada University	Has work experience in areas including credit business, business risk, and remedial & recovery in banking.	Risk Management and Finance

STATEMENT OF INDEPENDENCE OFTHE RISK MONITORING COMMITTEE

Each member of the Risk Monitoring Committee works objectively, free from intervention or interests of other parties, and has no financial, management, share ownership, or family relationships with members of the Board of Commissioners, Board of Directors, or Controlling Shareholders that could influence decision-making. This principle of independence is the foundation for ensuring that all recommendations, assessments, and oversight by the Committee are objective and reflect actual conditions.

The aspects of independence of the Risk Monitoring Committee members are outlined in the following table:

Table of Risk Monitoring Committee Independence

Name	Independency Aspect				
	No financial Relationship With the Board of Commissioners And the Board of Directors	No Management Relationship in BNi, Subsidiaries, or Affiliated Companies	No shares in BNi	No familial Relationship With the Board of Commissioners, the Board of Directors And/or fellow Members of Risk Monitoring Committee	Not serving on Boards of Political Parties, Government Officials
Vera Febyanthy	√	√	√	√	√
Donny Hutabarat	√	√	√	√	√
Retno Murwani	√	√	√	√	√

CONCURRENT POSITION INFORMATION

As a form of transparency and accountability, BNI openly discloses information regarding the concurrent positions held by each mem-ber of the Risk Monitoring Committee. This information is presented in full in the follow-ing table:

Name	Position in the Bank	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Vera Febyanthy	Chairman of the Risk Monitoring Committee & Independent Commissioner	None	None	None
Donny Hutabarat	Member & Commissioner	None	None	None
Retno Murwani	Independent Commissioners	None	None	None

RISK MONITORING COMMITTEE MEETINGS

Meeting Policy

The policies and procedures for conducting Risk Monitoring Committee meetings as stipulated in the Risk Monitoring Committee Charter are outlined as follows:

1. The Risk Monitoring Committee shall hold a meeting at least 1 (one) time in 1 (one) month.
2. Risk monitoring committee meetings may only be held if attended by a majority (i.e., more than 50% (fifty percent)) of the committee members.
3. Meetings are chaired by the Chairman of the Risk Monitoring Committee or the most senior member if the Chairman is unavailable.
4. If necessary, the Risk Monitoring Committee may invite relevant parties to attend the meeting.
5. Decisions are made based on consensus.
6. In the event that no consensus is reached, decisions are made based on a majority vote with the principle of 1 (one) person, 1 (one) vote.
7. The decision of the Risk Monitoring Committee meeting is considered valid if approved by more than 1/2 (one half) of the number of members of the Risk Monitoring Committee present. The regulation of the voting rights of Committee members adheres to the principle of 1 (one) person 1 (one) vote.
8. The results of the Committee meeting must be stated in the minutes of the meeting signed by all members of the Committee present and documented in accordance with laws and regulations.
9. Dissenting opinions that occur in the committee meeting must be clearly stated in the minutes of the meeting along with the reasons for the dissenting opinions.
10. Meeting minutes are prepared by the Committee Secretary.
11. The Risk Monitoring Committee submits meeting minutes in writing to the Board of Commissioners.
12. Attendance of committee members is reported in the committee's quarterly and annual reports.

Meeting Frequency and Attendance

Throughout 2025, the BNI Risk Monitoring Committee held a total of 14 (fourteen) meetings. During the period from 26 March 2025 to 13 August 2025, the Risk Monitoring Committee was unable to convene formal meetings as there were no effective members of the Board of Commissioners serving on the Committee (either as Chairperson or Commissioner Members), since they were still undergoing the OJK Fit and Proper Test process. Nevertheless, during this period, the Risk Monitoring Committee conducted 7 (seven) Internal Consolidation sessions and/or discussions with the relevant Director to carry out orientation and deepen its understanding of BNI's conditions in preparation for performing the duties and functions of the Risk Monitoring Committee. The frequency of meetings complied with the provisions stipulated in the Risk Monitoring Committee Charter. The following presents the attendance data of BNI Risk Monitoring Committee members at the meetings throughout 2025, reflecting the level of participation and commitment of the members in carrying out their supervisory duties and responsibilities effectively and consistently.

Name	Position	Number of Meetings [ACGS D.2.12, D.2.17]	Attended [ACGS D.2.12, D.2.17]	Percentage [ACGS D.2.12, D.2.17]
Erwin Rijanto Slamet[1)]	Chairman	5	5	100%
Pahala Nugraha Mansury[1)]	Member	5	4	80%
Fadlansyah Lubis[1)]	Member	5	5	100%
Septian Hario Seto[2)]	Member	3	3	100%
Vera Febyanthy[3)]	Chairman	9	9	100%
Suminto[4)]	Member	3	2	67%
Donny Hutabarat[5)]	Member	6	6	100%
Dwita Suherlina[8)]	Member	14	14	100%
Bambang Setyogroho[6)]	Independent Member	7	7	100%
Retno Murwani[7)]	Independent Member	7	7	100%

[1)] Effective as Chair/Member of the Risk Monitoring Committee until March 26, 2025
[2)] Effectively serving as a Member of the Risk Monitoring Committee until February 20, 2025, in connection with the expiration of the term of office as a Board of Commissioners of 5 (five) years from the date of appointment.
[3)] Effective as Chair of the Risk Monitoring Committee since August 13, 2025
[4)] Effective as a Member of the Risk Monitoring Committee from August 13, 2025 to October 8, 2025
[5)] Effective as a Member of the Risk Monitoring Committee from October 16, 2025
[6)] Effective as a Member of the Risk Monitoring Committee until September 30, 2025
[7)] Effective as a Member of the Risk Monitoring Committee since October 1, 2025
[8)] Effective as a Member of the Risk Monitoring Committee until December 18, 2025

Meeting Agenda

In 2025, the Risk Monitoring Committee held 14 (fourteen) meetings and 7 (seven) internal consolidations and discussions with relevant directors (during the period from March 26, 2025 to August 13, 2025), with the following agenda:

No.	Meeting Date	Meeting Agenda	Audit Committee Member	Invitee
1	January 14, 2025	Discussion of BNI Individual Health Level and Risk Profile as of December 31, 2024	• Erwin Rijanto Slamet[1)] • Pahala Nugraha Mansury[1)] • Septian Hario Seto[2)] • Fadlansyah Lubis[1)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Audit Committee, Risk Management Director, and relevant Division Heads
2	January 14, 2025	Internal KPR Meeting	• Erwin Rijanto Slamet[1)] • Pahala Nugraha Mansury[1)] • Septian Hario Seto[2)] • Fadlansyah Lubis[1)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Chair of the KPR and all KPR Members
3	February 11, 2025	Evaluation of Integrated Risk Profile and Integrated KPMM for Semester II/2024	• Erwin Rijanto Slamet[1)] • Pahala Nugraha Mansury[1)] • Septian Hario Seto[2)] • Fadlansyah Lubis[1)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Integrated Governance Committee, Risk Management Director, and relevant Division Heads
4	March 18, 2025	• Progress of BNI Risk Appetite Statement (RAS) Review Results • Evaluation of Credit Expansion Framework Guidelines	• Erwin Rijanto Slamet[1)] • Pahala Nugraha Mansury[1)] • Fadlansyah Lubis[1)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Risk Management Director, and relevant Division Heads
5	March 25, 2025	Evaluation of the 2024 Tactical Account Plan (TAP) achievements and plans for TAP improvement/development in 2025	• Erwin Rijanto Slamet[1)] • Fadlansyah Lubis[1)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Wholesale & International Banking Director, SEVP Corporate Banking, and relevant Division Heads
6	April 29, 2025	Internal Consolidation of KPR	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	All KPR Members
7	June 3, 2025	Discussion of the conditions of the Middle segment (Enterprise and Commercial) and the Small segment (i.e. Retail Productive) of BNI	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	President Commissioner, Commercial Banking Director, Risk Management Director, and relevant Division Heads
8	July 1, 2025	Internal Consolidation of Mortgage Loans	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	All KPR Members
9	July 15, 2025	Discussion of compliance functions and APU-PPT PPPSPM as well as compliance risks (including KLN) for Semester I/2025; and Discussion of Anti-Fraud function governance for Semester I/2025	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Audit Committee, Risk Management Director, Human Capital & Compliance Director, SEVP Remedial & Recovery, and relevant Division Heads
10	July 15, 2025	Discussion of Loan at Risk (LaR) conditions in all Credit segments for the position in June 2025	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Audit Committee, Risk Management Director, Consumer Banking Director, Commercial Banking Director, SEVP Wholesale Solutions & Value Chain, SEVP Credit Risk, SEVP Remedial & Recovery, and relevant Division Heads

No.	Meeting Date	Meeting Agenda	Audit Committee Member	Invitee
11	July 29, 2025	Discussion of Government Credit Program Support and Implementation at BNI	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	President Commissioner, Vice President Commissioner, Commercial Banking Director, Consumer Banking Director, Risk Management Director, SEVP Credit Risk, and relevant Division Heads
12	August 5, 2025	Discussion of Integrated Risk Profile and Integrated KPMM for the First Semester of 2025	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Suminto[4)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Integrated Governance Committee, Risk Management Director, and relevant Division Heads
13	August 26, 2025	Evaluation of risks related to transactions in Treasury, as well as updates on Market and Liquidity Risk management at BNI	• Vera Febyanthy[3)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Treasury & International Banking Director, Risk Management Director, SEVP Treasury, and relevant Division Heads
14	September 23, 2025	Evaluation of Sustainable Finance Policies and Implementation (GRC-ESG)	• Vera Febyanthy[3)] • Suminto[4)] • Dwita Suherlina[8)] • Bambang Setyogroho[6)]	Deputy President Director, Risk Management Director, Human Capital & Compliance Director, and relevant Division Heads
15	October 7, 2025	Evaluation of the Strategy for Managing Government SAL Fund Placements at BNI	• Vera Febyanthy[3)] • Suminto[4)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Risk Management Director, Corporate Banking Director, Consumer Banking Director, Treasury & International Banking Director, Finance & Strategy Director, SEVP Treasury, SEVP Credit Risk, SEVP Commercial & SME, SEVP Wealth Management, and relevant Division Heads
16	October 21, 2025	Evaluation of BNI's Loan at Risk (LaR) position for September 2025 (Third Quarter of 2025)	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Risk Management Director, Corporate Banking Director, Commercial Banking Director, Consumer Banking Director, SEVP Wholesale Solutions & Value Chain, SEVP Commercial & SME, SEVP Credit Risk, SEVP Remedial & Recovery, and relevant Division Heads
17	October 21, 2025	In-depth evaluation of credit in BNI's Corporate Banking segment	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Corporate Banking Director, Risk Management Director, SEVP Wholesale Solutions & Value Chain, SEVP Credit Risk, and relevant Division Heads
18	November 4, 2025	Evaluation of BNI's Remedial & Recovery (RR) performance and Legal Issues related to RR Activities	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Risk Management Director, Human Capital & Compliance Director, SEVP Remedial & Recovery, SEVP Legal & Governance, relevant Division Heads
19	November 26, 2025	Internal Mortgage Meeting	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Chair of the KPR and all KPR Members
20	December 12, 2025	Evaluation of Integrated Risk Profile and Integrated KPMM for the Second Half of 2025	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Integrated Governance Committee, Risk Management Director, and relevant Division Heads

No.	Meeting Date	Meeting Agenda	Audit Committee Member	Invitee
21	December 18, 2025	Discussion of BNI Individual Health Levels and Risk Profiles as of December 31, 2025	• Vera Febyanthy[3)] • Donny Hutabarat[5)] • Dwita Suherlina[8)] • Retno Murwani[7)]	Audit Committee, Risk Management Director, and relevant Division Heads

Internal consolidation and discussions conducted during the period did not involve any members of the Risk Monitoring Committee (neither the Chair nor the members of the Risk Monitoring Committee) as they were still undergoing the OJK Fit & Proper Test.
1) Effective as Chair/Member of the Risk Monitoring Committee until March 26, 2025.
2) Effectively serving as Chair of the Nomination and Remuneration Committee until February 20, 2025, in connection with the expiration of his term as a member of the Board of Commissioners after 5 (five) years since his appointment.
3) Effectively serving as a member of the Risk Monitoring Committee since August 13, 2025
4) Effective as a member of the Risk Monitoring Committee since August 13, 2025 and ending on October 8, 2025
5) Effective as a member of the Risk Monitoring Committee since October 16, 2025
6) Effective as a Member of the Risk Monitoring Committee until September 30, 2025
7) Effective as a Member of the Risk Monitoring Committee since October 1, 2025
8) Effective as a Member of the Risk Monitoring Committee until December 18, 2025

RISK MONITORING COMMITTEE REPORTING

The Risk Monitoring Committee reporting mechanism is carried out by submitting re-ports to the Board of Commissioners on eve-ry assignment given and/or issue that re-quires the attention of the Board of Commis-sioners, at least twice a year, or more fre-quently if necessary based on special as-signments or the identification of strategic issues. Reports are submitted in writing and discussed at Board of Commissioners meetings, either directly or through written documents.

2025 RISK MONITORING COMMITTEE MEMBER COMPETENCY IMPROVEMENT PROGRAM

All active members of the Risk Monitoring Committee participate in various educational and/or training activities to enhance their competencies and knowledge regarding best practices in governance when addressing cur-rent risk developments relevant to the bank-ing industry. The following is a list of training programs and competency development ma-terials that the Risk Monitoring Committee has participated in throughout 2025:

Name of Training/Workshop/ Conference/seminar	Implementation Date	Organizer
Vera Febyanthy – Chairman of KPR/Independent Commissioner		
Competency development/training can be found in the section on Training and/or Competency Improvement for Board of Commissioners Members in 2025.		
Donny Hutabarat – Member of KPR/Vice President Commissioner		
Competency development/training can be found in the section on Training and/or Competency Improvement for Board of Commissioners Members in 2025.		
Retno Murwani – Member of KPR/Independent Commissioner		
Risk Monitoring Committee Onboarding	October 1, 2025	BNI Corporate Secretary
Banking Risk Management Briefing Program for Qualification Level 7	December 17, 2025	BNI University

RISK MONITORING COMMITTEE KPI ACHIEVEMENTS IN 2025

The Risk Monitoring Committee's performance is assessed based on KPIs that have been agreed upon at the beginning of the year as a benchmark for performance achievement. In 2025, the Risk Monitoring Committee successfully achieved 117% of its KPI targets. This achievement demonstrates the active role of the Risk Monitoring Committee in providing effective support to the Board of Commissioners, particularly in ensuring that the Bank's risk management has been carried out comprehensively, measurably, and in accordance with the principle of prudence.

DESCRIPTION OF ACTIVITIES IN THE 2025 FISCAL YEAR

Throughout 2025, the BNI Risk Monitoring Committee has carried out its duties and responsibilities in accordance with the provisions of the applicable Charter. The Committee consistently evaluates the effectiveness of risk management implementation across all business lines, monitors compliance with internal policies and regulatory requirements, and submits relevant recommendations for improvement to the Board of Commissioners. In addition, the Committee also reviewed the Bank's risk profile, which includes credit risk, market risk, operational risk, and strategic risk, to ensure that risk management is carried out carefully and in line with BNI's business strategy. All results of meetings and monitoring activities, including reviews and evaluations conducted by the Risk Monitoring Committee, were submitted to the Board of Commissioners in the form of written reports and through Board of Commissioners meetings.

In 2025, the Risk Monitoring Committee held 14 (fourteen) meetings, 7 (seven) discussions, and conducted 74 (seventy-four) evaluations/studies/reviews, which aimed to ensure the effectiveness of risk management and compliance with the Bank's policies, regulations, and business strategy direction. Furthermore, the description of the BNI Risk Monitoring Committee's task implementation report throughout the current year is presented as follows:

1. Meetings and reviews concerning BNI's Bank Soundness Level, Risk Profile, Integrated Risk Profile, and the execution of the Risk Management Committee and Integrated Risk Management Committee's duties;
2. In-depth discussions on key issues related to Operational Risk, Legal Risk, Compliance Risk, Strategic Risk, Reputation Risk, Credit Risk, Market Risk, Liquidity Risk, Insurance Risk, and Intra-Group Risk.
3. Implementation of credit-related duties:
   a. Meetings and reviews on the handling of Loan at Risk (LaR) and credit restructuring at the BNI-wide and regional levels across Corporate, Enterprise, Commercial, Small (including KUR), and Consumer segments:
   b. Meetings and reviews of credit consultations submitted by the Board of Directors to the Board of Commissioners;
   c. Meetings and reviews of credit approvals to Related Parties submitted by the Board of Directors to the Board of Commissioners;
   d. Meetings and reviews on Remedial & Recovery discussions.;
   e. Meeting and review regarding the Implementation of BNI Support for Government Credit Programs;
   f. Meeting and review regarding the Management and Distribution of Budget Surplus (SAL) funds placed by the Government in BNI;g. Meeting on the Evaluation and Improvement of BNI's Tactical Account Plan (TAP);
4. Review of updates to BNI's General Risk Management Policy and General Integrated Risk Management & Integrated Capital Policy proposed by the Board of Directors to the Board of Commissioners;
5. Meetings and reviews of updates to the Bank's Credit Policy (KPB) proposed by the Board of Directors to the Board of Commissioners.
6. Review of updates to BNI's 2024/2025 Recovery Plan Document submitted by the Board of Directors for the Board of Commissioners' approval.;
7. Review of BNI's 2026 Business Plan (RBB)/ Company Budget Work Plan (RKAP), as well as revisions to BNI's 2025 RBB/RKAP;
8. Meeting and review of BNI's 2025 Risk Appetite Statement proposed by the Board of Directors for approval by the Board of Commissioners;
9. Meeting and review of the Implementation of Sustainable Finance (Environmental, Social, & Governance/ESG) at BNI;
10. Review of BNI's DPLK Risk Management Policy;
11. Review of the Risk Monitoring Committee Charter.

EVALUATION OF THE RISK MONITORING COMMITTEE ON THE IMPLEMENTATION OF RISK MANAGEMENT AT THE BANK

In 2025, the Risk Monitoring Committee conducted a comprehensive evaluation of the implementation of risk management across all of the Bank's business lines. The results showed that risk management was carried out in accordance with regulatory requirements and internal policies, with reference to the established risk limits. Improvements in the adequacy of the risk monitoring system also support faster and more accurate decision-making. The Committee assessed the Bank's overall risk health as "Healthy" and concluded that risk management implementation has been adequate, despite some minor weaknesses that can be resolved through normal business activities.

RISK MONITORING COMMITTEE'S WORK PLAN FOR 2026

The Risk Monitoring Committee has formulated a roadmap for 2026, which is based on the evaluation of the implementation of tasks in 2025 and projections of the Bank's future business needs. The work plan includes holding meetings, conducting reviews, and submitting reports to the Board of Commissioners, with a focus on strategic priorities that are in line with the Bank's business development and risk

dynamics. The following are the priorities for the implementation of BNI's Risk Monitoring Committee activities for 2026:

1. Evaluation of the Bank's Soundness Level every six months (semi-annually).
2. Evaluation of the Individual Risk Profile every three months (quarterly).
3. In-depth evaluation of issues and reports to the Board of Commissioners concerning Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Strategic Risk, Compliance Risk, and Reputation Risk (individually), as well as Intra Group Transaction Risk and Insurance Risk (on an integrated basis).
4. Monitoring and evaluation of the Risk Management Unit (SKMR), Integrated Risk & Capital Management Unit (SKMRT), Risk Management Committee (KMR), and Integrated Risk Management Committee (KMRT).
5. Periodic or annual review of General Policies and Documents that require approval from the Board of Commissioners, including: Bank Credit Policy (KPB), General Risk Management Policy (KUMR), General Integrated Risk Management Policy (KUMRT), Good Corporate Governance Policy, Integrated Governance Policy, Updates to the Recovery Action Plan, and so on in accordance with the Board of Directors' proposals to the Board of Commissioners.
6. Review/discussion of proposals/requests from the Board of Directors that require approval from the Board of Commissioners and follow-up of the Board of Commissioners' dispositions regarding reports/letters submitted to the Board of Commissioners and reports to the Board of Commissioners.
7. Review and update of the Risk Monitoring Committee Charter as needed, in response to regulatory developments and changing conditions.

REMUNERATION OF RISK MONITORING COMMITTEE MEMBERS [ACGS C.3.4]

The remuneration policy for Risk Monitoring Committee members who are also members of the Board of Commissioners is integrated into the honorarium provided to the Board of Commissioners, with no additional remuneration for committee membership. Meanwhile, the honorarium for independent (non-Commissioner) committee members is determined by the Board of Commissioners, with a maximum amount set at 20% of the President Director's salary. No additional income is provided beyond this honorarium. This policy aligns with the provisions of the Indonesian Ministry of SOEs Regulation No. PER-3/MBU/03/2023, dated March 20, 2023, regarding the Governance and Human Resources of State-Owned Enterprises.

INTEGRATED GOVERNANCE COMMITTEE

The Integrated Governance Committee is formed by and is directly responsible to the BNI Board of Commissioners who represents the Parent Company of the Financial Conglomerate (PIKK), to strengthen oversight over the implementation of Integrated Governance within the BNI Financial Conglomerate in accordance with applicable laws and regulations. This Committee holds a strategic role in supporting the Board of Commissioners to ensure the implementation of good corporate governance within the scope of the BNI Financial Conglomerate, as well as providing strategic advice and recommendations to the Board of Directors regarding the implementation and continuous evaluation of the Integrated Governance Guidelines, including input for the improvement of governance policies and practices within the Bank.

LEGAL BASIS FOR THE ESTABLISHMENT OF THE INTEGRATED GOVERNANCE COMMITTEE

The establishment of the BNI Integrated Governance Committee is based on applicable laws and regulations as well as best practices in the Indonesian banking industry, including:

1. Financial Services Authority Regulation Number 30 of 2024 dated December 23, 2024, concerning Financial Conglomerates and Parent Companies of Financial Conglomerates.
2. Financial Services Authority Regulation Number 17 of 2023 dated September 14, 2023, concerning the Implementation of Governance for Commercial Banks.
3. Financial Services Authority Regulation Number 45/POJK.03/2020 dated October 16, 2020, concerning Financial Conglomerates.
4. Financial Services Authority Regulation Number 18/POJK.03/2014 dated November 18, 2014, concerning the Implementation of Integrated Governance for Financial Conglomerates.
5. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia Number PER 2/MBU/03/2023 dated March 03, 2023, concerning Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises.
6. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia Number PER 3/MBU/03/2023 dated March 20, 2023, concerning Organs and Human Resources of State-Owned Enterprises.
7. Financial Services Authority Circular Letter No. 14/SEOJK.03/2025 dated June 24, 2025, concerning the Implementation of Governance for Commercial Banks.

8. Financial Services Authority Circular Letter No. 15/SEOJK.03/2015 dated May 25, 2015, concerning the Implementation of Integrated Governance for Financial Conglomerates.
9. Articles of Association of the Company and its amendments.
10. Decree of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk No. KEP/006/DK/2015 dated June 22, 2015, concerning the Establishment of the Integrated Governance Committee.

INTEGRATED GOVERNANCE COMMITTEE CHARTER

In discharging their duties and responsibilities, all members of the Integrated Governance Committee are guided by the Integrated Governance Committee Charter stipulated through the Decree of the Board of Commissioners No. KEP/022/DK/2025 dated September 19, 2025. This Charter holds a central role in maintaining alignment in the implementation of governance within the Bank and its Subsidiaries in accordance with applicable regulations.

Substantially, the BNI Integrated Governance Committee Charter regulates, among others:
1. Basis for the establishment and implementation of the duties of the Integrated Governance Committee;
2. Definitions used in the Integrated Governance Committee;
3. Establishment and Structure of the Integrated Governance Committee;
4. Membership requirements of the Integrated Governance Committee;
5. Membership of the Integrated Governance Committee;
6. Duties and responsibilities of the Integrated Governance Committee;
7. Authority of the Integrated Governance Committee;
8. Term of office of members of the Integrated Governance Committee;
9. Meetings of the Integrated Governance Committee;
10. Reporting of the Integrated Governance Committee; and

The BNI Integrated Governance Committee Charter is evaluated and updated periodically, with the latest update performed on September 19, 2025, which has been published on the BNI official website (https://www.bni.co.id/id-id/perseroan/tata-kelola/komite-dewan-komisaris). The Bank takes this step as a form its commitment to transparency and information disclosure to all stakeholders.

DUTIES AND RESPONSIBILITIES OF THE INTEGRATED GOVERNANCE COMMITTEE

The BNI Integrated Governance Committee has duties and responsibilities that at least include:
1. Evaluating the implementation of Integrated Governance at least through an assessment of the adequacy of internal control, the implementation of integrated compliance functions, and the implementation of Integrated Governance Guidelines. In conducting the evaluation, the Integrated Governance Committee obtains information in the form of evaluation results on the implementation of internal audits, the implementation of risk management, and the compliance function of each Financial Services Institution from members of the Board of Commissioners of each Financial Services Institution who are members of the Integrated Governance Committee.
2. Providing recommendations to the Board of Commissioners of the PIKK regarding the results of the evaluation of the implementation of Integrated Governance and the improvement of the Integrated Governance Guidelines.
3. Carrying out the duties of the Board of Commissioners of the PIKK to review and evaluate materials related to the duties of the Integrated Governance Committee and/or other duties determined by the Board of Commissioners of the PIKK.
4. Evaluating the suitability between the Integrated Governance policy and the implementation of said policy and providing recommendations to the Board of Commissioners of the PIKK regarding the Integrated Governance policy and its implementation to ensure that Integrated Governance management has been carried out adequately.
5. Before the current fiscal year, the Integrated Governance Committee must prepare and submit an Annual Work Plan and Budget to the Board of Commissioners of the PIKK for determination, a copy of which is submitted by the Board of Commissioners of the PIKK to the Board of Directors of the PIKK for information. The implementation of the Integrated Governance Committee's Annual Work Plan and Budget is reported to the Board of Commissioners of the PIKK.
6. Members of the Integrated Governance Committee must carry out their duties properly and maintain the confidentiality of all documents, data, information, and everything related to the implementation of the Integrated Governance Committee's Duties, which are only to be used for the purpose of carrying out their duties.

AUTHORITY OF THE INTEGRATED GOVERNANCE COMMITTEE

As part of its duties to assist the Board of Commissioners of the PIKK, the Integrated Governance Committee is delegated the following authorities:

1. The Integrated Governance Committee may request explanations or necessary information regarding employees, funds, assets, and other resources related to the implementation of its duties to the Financial Services Institutions within the BNI financial conglomerate, while still observing applicable regulations. The Committee is required to report the results of such assignments in writing to the Board of Commissioners of the PIKK.
2. Members of the Integrated Governance Committee are authorized to communicate with work units in the PIKK, for functions including Internal Audit, Legal and Compliance, Finance and Risk Management, Human Resources, and necessary aspects of Business Operations functions, to obtain information, clarification, and request required reports in an integrated manner and/or to fulfill the duties of the Integrated Governance Committee.
3. To carry out its duties, the Integrated Governance Committee may cooperate or coordinate with other Committees under the Board of Commissioners of the PIKK, as well as relevant divisions/units/work units within the PIKK or other Financial Services Institutions within the BNI Financial Conglomerate.

POLICY ON APPOINTMENT, DISMISSAL, AND TERM OF OFFICE OF THE INTEGRATED GOVERNANCE COMMITTEE MEMBERS

Policies regarding the appointment, dismissal, and term of office of the BNI Integrated Governance Committee are described as follows:

1. The Chairperson and members of the Integrated Governance Committee are appointed and dismissed by the Board of Commissioners of the PIKK.
2. Members of the Integrated Governance Committee who are members of the Board of Commissioners of the PIKK, or the Board of Commissioners and Supervisory Board of Financial Services Institutions:
   a. Serve a term that aligns with their appointment as members of the Board of Commissioners or Supervisory Board, as determined by the GMS.
   b. Automatically cease to hold office when their term as a member of the Board of Commissioners or Supervisory Board ends.
3. The term of office of members of the Integrated Governance Committee who come from independent parties is a maximum of 3 (three) years and can be extended once for a period of 2 (two) years so that the total term of office of members of the Integrated Governance Committee who come from independent parties in the company is a maximum of 5 (five) years, without reducing the rights of the Board of Commissioners of the PIKK to dismiss the relevant committee members at any time.
4. The Board of Commissioners of the PIKK may dismiss members of the Integrated Governance Committee at any time if they are deemed to have failed to perform their duties as stipulated in the Decree of appointment/assignment of the relevant committee members.
5. If the member of the Board of Commissioners of the PIKK serving as Chairperson of the Integrated Governance Committee resigns from their position as a member of the Board of Commissioners of the PIKK, the Chairperson must be replaced by another Independent Commissioner of the PIKK who also serves as Chairperson of one of the Committees within the PIKK, within a maximum of 30 (thirty) days.
6. The dismissal and appointment of Committee members are reported to the GMS.

STRUCTURE, MEMBERSHIP, AND EXPERTISE OF THE INTEGRATED GOVERNANCE COMMITTEE

Requirements and criteria regarding the structure and membership of the BNI Integrated Governance Committee are described as follows:

a. The Integrated Governance Committee consists of at lea:
   1) An Independent Commissioner who serves as Chairperson of one of the committees within the PIKK, as the Chairperson as well as a member;
   2) Independent Commissioners representing and appointed from each Financial Services Institution within the BNI Financial Conglomerate, as members;
   3) An independent party as a member. The independent party may come from independent party members of the Committees within the PIKK;
   4) Members of the Sharia Supervisory Board from Financial Services Institutions that carry out business activities based on Sharia principles within the BNI Financial Conglomerate as members, the number of whom is adjusted to the needs of the BNI Financial Conglomerate as well as the efficiency and effectiveness of the Integrated Governance Committee's duties.

b. The number and composition of Independent Commissioners who are members of the Integrated Governance Committee as referred to in point a.2 above are adjusted to the needs of the BNI Financial Conglomerate and the efficiency and effectiveness of the Integrated Governance Committee's duties, considering at least the representation of each financial services sector.
c. The membership of Independent Commissioners in the Integrated Governance Committee as referred to in point a.2 above may consist of permanent and non-permanent membership, in accordance with the needs of the BNI Financial Conglomerate, whereby if necessary, the PIKK may add non-permanent membership of Independent Commissioners from Financial Services Institutions that have not yet become members of the Integrated Governance Committee.
d. The membership of Independent Commissioners, independent parties, and members of the Sharia Supervisory Board in the Integrated Governance Committee within the BNI Financial Conglomerate as referred to in point a. above is not considered as holding concurrent positions.

NUMBER, STRUCTURE, AND COMPOSITION OF THE INTEGRATED GOVERNANCE COMMITTEE MEMBERS

The membership composition of the BNI Integrated Governance Committee as of December 31, 2025, consisted of 13 (thirteen) members, with the latest changes based on the BNI Board of Commissioners' Decree No. KEP/035/DK/2025 and No. KEP/037/DK/2025 dated December 18, 2025. BNI confirms that the number and structure of the Integrated Governance Committee are in alignment with the provisions regulated in the Integrated Governance Committee Charter.

The composition of the BNI Integrated Governance Committee members for the 2025 period is as follows:

January 1, 2025 – March 26, 2025 Period

Name	Position	Term of Office	Period	Position in Main Entity (i.e., PIKK) and Subsidiary Company
Pradjoto[1]	Chairman	October 30, 2023 - March 26, 2025	First	President Commissioner/Independent Commissioner of the Main Entity (i.e. PIKK)
Askolani[2]	Member	March 10, 2020 - March 26, 2025	Second	Commissioner of Main Entity (i.e. PIKK)
Robertus Billitea[2]	Member	September 21, 2023 - March 26, 2025	First	Commissioner of Main Entity (i.e. PIKK)
Mohamad Yusuf Permana[2]	Member	October 24, 2024 - March 26, 2025	First	Commissioner of Main Entity (i.e. PIKK)
Alwi Abdurrahman Shihab[3]	Member	January 9, 2025 - present	First	Independent Commissioner of PT BNI Life Insurance
Siti Haniatunnisa	Member	October 28, 2022 - present	First	Sharia Supervisory Board of PT BNI Life Insurance
Rudy Tandjung	Member	October 17, 2024 - present	First	President Commissioner/Independent Commissioner of PT BNI Sekuritas
Eko Priyo Pratomo	Member	October 28, 2022 - present	First	President Commissioner/Independent Commissioner of PT BNI Asset Management
Rufina Tinawati Marianto	Member	July 22, 2022 - present	First	Independent Commissioner of PT Bank Hibank Indonesia
Suhartono	Member	January 19, 2024 - present	First	President Commissioner/Independent Commissioner of PT BNI Multifinance[4]
Nurani Raswindriati	Member	June 1, 2022 – September 30, 2025	Second	Independent Party

Description:
1) Resigned as Chair/Member of the TKT Committee on February 20, 2025.
2) Resigned as Member of the TKT Committee on March 26, 2025.
3) Effective as Member of the TKT Committee since January 9, 2025
4) Effective after the reappointment process is completed

BNI made adjustments to the membership composition of the Integrated Governance Committee based on the results of the Company's Annual General Meeting of Shareholders (GMS) dated March 26, 2025, which changed the composition of the Company's management.

March 26, 2025 – October 8, 2025 Period

Name	Position	Term of Office	Period	Position in Main Entity (i.e., PIKK) and Subsidiary Company
Omar Sjawaldy Anwar[1)]	Chairman	June 30, 2025 - present	First	President Commissioner/Independent Commissioner
Tedi Bharata[2)]	Member	June 5, 2025 - present	First	Vice President Commissioner
Vera Febyanthy[3)]	Member	August 13, 2025 - present	First	Independent Commissioner
Didik Junaedi Rachbini[3)]	Member	August 13, 2025 - present	First	Independent Commissioner
Donny Hutabarat[4)]	Member	October 16, 2025 – present	First	Commissioner
Alwi Abdurrahman Shihab	Member	January 9, 2025 - present	First	Independent Commissioner of PT BNI Life Insurance
Siti Haniatunnisa	Member	October 28, 2022 - present	First	Sharia Supervisory Board of PT BNI Life Insurance
Rudy Tandjung	Member	October 17, 2024 - present	First	President Commissioner/Independent Commissioner of PT BNI Sekuritas
Eko Priyo Pratomo	Member	October 28, 2022 - present	First	President Commissioner/Independent Commissioner of PT BNI Asset Management
Suhartono	Member	January 19, 2024 - present	First	President Commissioner and Independent Commissioner of PT BNI Multifinance
Rufina Tinawati Marianto	Member	July 22, 2022 - present	First	Independent Commissioner of PT Bank Hibank Indonesia
Suminto[5)]	Member	August 13, 2025 – October 8, 2025	First	Commissioner
Nurani Raswindriati[6)]	Member	June 1, 2022 – September 30, 2025	Second	Independent Party

Description:
1) Effective as Chair of the TKT Committee since June 30, 2025
2) Effective as Member of the TKT Committee since June 5, 2025
3) Effective as Member of the TKT Committee since August 13, 2025
4) Effective as a Member of the TKT Committee since October 16, 2025
5) Effective as a Member of the TKT Committee since August 13, 2025 and ceased to serve as a Member of the TKT Committee since October 8, 2025.
6) Ceased to serve as a member of the TKT Committee as of September 30, 2025
7) Effective after the reappointment process is completed

During the 2025 period, BNI made several adjustments to the membership composition of the Integrated Governance Committee with the termination of Mr. Suminto and Ms. Nurani Raswindriati as committee members and independent committee members, such that as of December 31, 2025, the membership composition is as follows:

October 8, 2025 – December 31, 2025 Period

Name	Position	Term of Office	Period	Position in Main Entity (i.e., PIKK) and Subsidiary Company
Omar Sjawaldy Anwar[1)]	Chairman	June 30, 2025 - present	First	President Commissioner/Independent Commissioner
Tedi Bharata[2)]	Member	June 5, 2025 - present	First	Vice President Commissioner
Vera Febyanthy[3)]	Member	August 13, 2025 - present	First	Independent Commissioner
Didik Junaedi Rachbini[3)]	Member	August 13, 2025 - present	First	Independent Commissioner
Donny Hutabarat[4)]	Member	October 16, 2025 – present	First	Commissioner
Alwi Abdurrahman Shihab	Member	January 9, 2025 - present	First	Independent Commissioner of PT BNI Life Insurance
Siti Haniatunnisa	Member	October 28, 2022 - present	First	Sharia Supervisory Board of PT BNI Life Insurance
Rudy Tandjung	Member	October 17, 2024 - present	First	President Commissioner/Independent Commissioner of PT BNI Sekuritas
Eko Priyo Pratomo	Member	October 28, 2022 - present	First	President Commissioner/Independent Commissioner of PT BNI Asset Management

Name	Position	Term of Office	Period	Position in Main Entity (i.e., PIKK) and Subsidiary Company
Suhartono	Member	January 19, 2024 - present	First	President Commissioner and Independent Commissioner of PT BNI Multifinance[6)]
Rufina Tinawati Marianto	Member	July 22, 2022 - present	First	Independent Commissioner of PT Bank Hibank Indonesia
Jhon Fernando Tamba[5)]	Member	December 18, 2025 – present	First	Independent Party
Alih Suasono[5)]	Member	December 18, 2025 – present	First	Independent Party

Description:
1) Effective as Chair of the TKT Committee since June 30, 2025
2) Effective as Member of the TKT Committee since June 5, 2025
3) Effective as Member of the TKT Committee since August 13, 2025
4) Effective as a Member of the TKT Committee since October 16, 2025
5) Effective as a Member of the TKT Committee since December 18, 2025
6) Effective after the reappointment process is completed

INTEGRATED GOVERNANCE COMMITTEE PROFILE

More complete information regarding the profiles of the Integrated Governance Committee members who serve as members of the Bank's Board of Commissioners can be found in the Company Profile Chapter, Board of Commissioners Profile sub-chapter, in this Annual Report. The following are brief profiles of the BNI Integrated Governance Committee members serving as of December 31, 2025:

Chair of the Integrated Governance Committee

Omar Sjawaldy Anwar	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/008/DK/2025 dated August 21, 2025
Term of Office	June 30, 2025 - present
Professional Certication	Risk Management Certification Level 6 Without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Board of Commissioners Profile Sub-chapter.

Member of the Integrated Governance Committee Concurrently Serving as a Commissioner of the PIKK

Tedi Bharata	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/008/DK/2025 dated August 21, 2025
Term of Office	June 5, 2025 - present
Professional Certication	Risk Management Certification Level 6 Without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Board of Commissioners Profile Sub-chapter.

Vera Febyanthy	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/008/DK/2025 dated August 21, 2025
Term of Office	August 13, 2025 - present
Professional Certication	Risk Management Certification Level 6 Without Levels
Complete Profile	Her complete profile is described in the Company Profile Chapter, Board of Commissioners Profile Sub-chapter.

Didik Junaedi Rachbini	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/008/DK/2025 dated August 21, 2025
Term of Office	August 13, 2025 - present
Professional Certication	Risk Management Certification Level 6 Without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Board of Commissioners Profile Sub-chapter.

Donny Hutabarat	
Legal Basis of Appointment	Board of Commissioners Decree No. KEP/029/DK/2025 dated October16, 2025
Term of Office	October16, 2025 - present
Professional Certication	Risk Management Certification Level 6 Without Levels
Complete Profile	His complete profile is described in the Company Profile Chapter, Board of Commissioners Profile Sub-chapter.

Member of the Integrated Governance Committee Concurrently Serving as a Commissioner of a Subsidiary Company



Alwi Abdurrahman Shihab
Member of the Integrated Governance Committee

Age
79 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor of Arts in Theology, University of Al-Azhar, Cairo, Egypt (1966)
- Master of Arts in Theology, University of Al-Azhar, Cairo, Egypt (1968)
- Doctorate in Philosophy of Faith, Ain Shams University, Cairo, Egypt (1990)
- Master's Degree in Religious Studies, Temple University, USA (1992)
- Doctorate in Religious Studies, Temple University, USA (1995)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since January 2025 based on BNI Board of Commissioners Decree No. KEP/001/DK/2025

Term of Office
January 9, 2025 – Present (First Period)

Professional Certification and/or Training
- Integrated Governance Expert Certification, by the Risk Management Certification Body (LSPMR)
- Governance, Risk, and Compliance (GRCE) Professional Certification, by the Governance, Risk, and Compliance Professional Certification Body (LSP-TRK)
- Certified in Risk Governance Professional (CRGP)
- Certified Anti-Fraud Governance (CAFG)

Work Experience
- Independent Commissioner of PT BNI Life Insurance (2021–present)
- President Commissioner of PT Askrindo (Persero) (2017–2020)
- Special Envoy of the President of the Republic of Indonesia for the Middle East and the OIC (2016–2019)
- Special Consultant in Marketing at PT Batutua Tembaga Raya, PT Indotan, and PT Indonesia Mid-East Consultancy (2015)
- Special Advisor for International Business Development at PT Pertamina (Persero) (2015)
- Independent Commissioner of Asuransi Rama Jakarta (2007–2013)
- Coordinating Minister for People's Welfare (2004–2005)
- Minister of Foreign Affairs of the Republic of Indonesia (1999–2001)

Concurrent Position

BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
Independent Commissioner of PT BNI Life Insurance (2021 – present)



Rudy Tandjung
Member of the Integrated Governance Committee

Age
58 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor of Social Economics in Agriculture from Bogor Agricultural University (1991); and
- Master of Business and International Finance from Oklahoma City University (1995)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since October 2024 based on BNI Board of Commissioners Decree No. KEP/026/DK/2024.

Term of Office
2024 – Present (First Period)

Professional Certification and/or Training
- Risk Management Certification Level 4, by the Risk Management Certification Body (BSMR);
- Executive Education Programmes Certification, by The Insead Education Singapore; and
- GRCE Principal Professional Certification.

Work Experience
- President Commissioner/Independent Commissioner of PT BNI Sekuritas (2024 – present);
- Head of Consumer Banking, PT Bank DBS Indonesia (Nov 2019 – Dec 2023);
- Head of Commercial Banking, PT Bank DBS Indonesia (Sept 2018 – Nov 2019);
- Chief Operating Officer, PT Bank DBS Indonesia (Maret 2015 – Sept 2018);
- Komisaris, PT Kustodian Sentral Efek Indonesia (Juni 2012 – Juni 2015);
- Head of Transaction Banking. PT Bank Permata Tbk (Jan 2010 – Mar 2015).

Concurrent Position

BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- President Commissioner/Independent Commissioner of PT BNI Sekuritas (2024 – present);
- Chairperson of the Audit Committee of PT BNI Sekuritas (2024 – present);
- Member of the Risk Monitoring Committee of PT BNI Sekuritas (2024 – present);
- Vice Chairman of Sports, Indonesian Bankers Association (IBI) (2023 – present);
- Member of Institutional Relations, National Banking Association (PERBANAS) (2020 – present); and
- Member of the Banking Committee, Indonesian Employers Association (APINDO) (2019 – present).



Siti Haniatunnisa
Member of the Integrated Governance Committee

Age
41 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor of Law from the International Islamic University of Malaysia (IIUM) (2010); and
- Master of Law from the University of Indonesia (2015).

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since December 2022 based on BNI Board of Commissioners Decree No. KEP/021/DK/2022 dated October 28, 2022.

Term of Office
2022 – Present (First Period)

Professional Certification and/or Training
- Certified in Risk Governance Professional (CRGP);
- Sharia Supervisor Certification;
- LSP MUI Assessor Certification;
- GRCE Professional Utama Certification;
- Risk Management Certification Level 4; and
- Competency Assessor.

Work Experience
- Chairman of Syeikh Nawawi Banten University (2016–present);
- Member of PT BRILife DPS (2016–present);
- Member of PT Asuransi Jasindo Syariah DPS (2017–present);
- Member of PT DPLK Muamalat DPS (2018–present);
- Member of PT Bank Muamalat Indonesia DPS (2019–present);
- Member of PT BNI Life Insurance DPS (2020–present); and
- DSN-MUI Plenary Member (2021–present).

Concurrent Position

BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- Chairman of Syeikh Nawawi Banten University (2016–present);
- Member of PT BRILife DPS (2016–present);
- Member of PT Asuransi Jasindo Syariah DPS (2017–present);
- Member of PT DPLK Muamalat DPS (2018–present);
- Member of PT Bank Muamalat Indonesia DPS (2019–present);
- Member of PT BNI Life Insurance DPS (2020–present); and
- DSN-MUI Plenary Member (2021–present).



Eko Priyo Pratomo
Member of the Integrated Governance Committee

Age
62 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor of Mechanical Engineering/Aeronautical Engineering from Bandung Institute of Technology (1988); and
- Master of Management from IPMI International Business School (1991)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since October 2022 based on BNI Board of Commissioners Decree No. KEP/020/DK/2022 dated October 28, 2022.

Term of Office
2022 – Present (First Period)

Professional Certification and/or Training
- Investment Manager Representative (Financial Services Authority);
- Training Program for Investment Professional (Institute for Financial Analysis Development);
- Chartered Financial Consultant (Singapore College of Insurance);
- Chartered Life Underwriter (Singapore College of Insurance);
- Certified Governance Oversight Professional (CGOP) Professional Competency Certification by the Professional Certification Body – Mitra Kalyana Sejahtera (LSP-MKS); and
- GRCE Professional Utama Certification.

Work Experience
- President Commissioner/Independent Commissioner of PT BNI Asset Management (April 2022 – present);
- Senior Advisor of PT Mandiri Manajemen Investasi (2019 – 2020);
- Director, CEO, Senior Advisor of PT BNP Paribas AM (1996 – 2018);
- Deputy GM, Marketing Director of PT Graha Buana Cikarang (1995 – 1996);
- Deputy Marketing Manager of PT KSCI - Mitsui Group (1992 – 1995); and
- Lead Engineer of PT IPTN (1988 – 1990).

Concurrent Position

BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- President Commissioner/Independent Commissioner of PT BNI Asset Management (2022 – present;
- Chairperson of the Audit Committee of PT BNI Asset Management;
- Chairperson of the Risk Monitoring Committee of PT BNI Asset Management; and
- Founder/Advisor of Syamsi Dhuha Foundation.



Suhartono
Member of the Integrated Governance Committee

Age
68 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
Bachelor of Law from the Diponegoro University (1982)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since January 2024 based on BNI Board of Commissioners Decree No. KEP/001/DK/2024 dated January 19, 2024.

Term of Office
2024 – Present (First Period)

Professional Certification and/or Training
- Certified Risk Governance Professional (CRGP) by the Risk Management Professional Certification Body (LSPMR) (2024);
- Financing Specialist Professional Certification for Directors/ Commissioners by the Indonesian Financing Professional Certification Body (LSPPI); and
- Risk Governance Professional (CRGP) Certification.

Work Experience
- President Commissioner & Independent Commissioner of PT BNI Multifinance (2023–present);
- Commissioner of PT Adiprana Sentosa Indovesco (2019);
- Advisor to PT Koperasi Nusa Raya Cipta (2018);
- Commissioner of PT Wahana Inti Narendra (2018);
- President Commissioner of PT Mahesa Altra Sentosa (2018);
- Commissioner of PT Asuransi Astra Buana (2017–2018);
- President Director of PT Federal International Finance (2007–2017);
- Vice President Director of PT Federal International Finance (2001–2007);
- Marketing Director of PT Federal International Finance (1998–2001);
- General Marketing Manager of PT Federal International Finance (1997–1998);
- Regional Manager of PT Federal International Finance (Central Java, DIY, and East Java Regions) (May 1, 1993 – 1997);
- Branch Manager of PT Federal International Finance (Semarang Branch) (1991–1993);
- Branch Manager of PT Mitra Pinasthika Mustika/MPM (Malang Branch) (1989–1990); and
- Marketing Section Head of PT Astra International (Honda Sales Operation Central Java Region) (1983–1989).

Concurrent Position

BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- President Commissioner/Independent Commissioner of PT BNI Multifinance (2023–present);
- Chairperson of the Audit Committee of BNI Finance;
- Chairperson of the Risk Monitoring Committee of BNI Finance; and
- Member of the Nomination & Remuneration Committee of BNI Finance.

Note:
*) Effective after the reappointment process is completed.



Rufina Tinawati Marianto
Member of the Integrated Governance Committee

Age
66 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
Bachelor's Degree in Architecture and Economics Management from UNIKA Parahyangan Bandung (1986)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since July 2022 based on BNI Board of Commissioners Decree No. KEP/012/DK/2022 dated July 22, 2022.

Term of Office
2022 – Present (First Period)

Professional Certification and/or Training
- Certified Governance Oversight Professional (CGOP) Professional Competency Certification by the Professional Certification Body – Mitra Kalyana Sejahtera (LSP-MKS).
- Banking Risk Management Competency Certification Qualification 6 by the Professional Certification Body of the Banking Professional Certification Body (LSP LSPP).

Work Experience
- Independent Commissioner of PT Bank Hibank Indonesia (2022–present).
- Independent Commissioner of PT Bank Mayora (2016–2022).
- Commercial Sales & Marketing Support Head of PT Bank OCBC NISP Tbk (2013–2014).
- Executive VP Commercial Business Unit of PT Bank OCBC NISP Tbk (2012–2013).
- Commercial Business Division Head of PT Bank OCBC NISP Tbk (2009–2011).
- General Manager Commercial Jababeka of PT Bank Permata (2003–2006).

Concurrent Position

BNI
Member of the Integrated Governance Committee – PT Bank Negara Indonesia (Persero) Tbk

Other Companies/Institutions
- Independent Commissioner PT Bank Hibank Indonesia (2022 - present)
- Chairman of the Audit Committee PT Bank Hibank Indonesia

Member of Integrated Governance Committee from Independent Party



Alih Suasono
Member of the Integrated Governance Committee (Independent Party)

Age
58 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor's degree (S1) from Gadjah Mada University (1991)
- Master's degree (S2) in Human Resource Management from Tanjungpura University (2003)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since December 2025 based on BNI Board of Commissioners Decree No. KEP/035/DK/2025 dated December 18, 2025.

Term of Office
2025 – Present (First Period)

Professional Certification and/or Training
Banking Risk Management Competency Certification Level 4.

Work Experience
- Head of Small Credit Center Batam, PT Bank Negara Indonesia Tbk (2010–2012)
- Head of Medium Credit Center Surabaya, PT Bank Negara Indonesia Tbk (2012–2013)
- Head of Medium Credit Center Pekanbaru, PT Bank Negara Indonesia Tbk (2013–2016)
- Head of Medium Credit Center Malang, PT Bank Negara Indonesia Tbk (2016–2017)
- Head of Regional Banking Business Malang, PT Bank Negara Indonesia Tbk (2017–2019)
- Deputy Head of Medium Enterprise Business Division, PT Bank Negara Indonesia Tbk (2019–2021)
- Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025–present)

Concurrent Position

BNI
-

Other Companies/Institutions
-



Jhon Fernando Tamba
Anggota Komite Tata Kelola Terintegrasi (Pihak Independen)

Age
57 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor's Degree (S1) in Accounting from Gadjah Mada University (1995)
- Master's Degree (S2) in Management from the University of Indonesia (2007)

Legal Basis of Appointment
Appointed for the first time as Member of the Integrated Governance Committee since December 2025 based on BNI Board of Commissioners Decree No. KEP/037/DK/2025 dated December 18, 2025.

Term of Office
2025 – Present (First Period)

Professional Certification and/or Training
Banking Risk Management Competency Certification Level 4.

Work Experience
- General Manager of Corporate Finance & Treasury Department, PT Adhi Karya (Persero) Tbk (2021–2023);
- Head of Network Credit Audit Group, PT Bank Negara Indonesia Tbk (2010–2012);
- Group Head of Corporate Business Banking Audit, PT Bank Negara Indonesia Tbk (2012–2013);
- Deputy Division Head of Corporate Business Risk Division, PT Bank Negara Indonesia Tbk (2013–2014);
- Deputy Head of Corporate & MHE Credit Risk Division, PT Bank Negara Indonesia Tbk (2014–2019); and
- Deputy Head of Corporate & Multinational Business Division 2, PT Bank Negara Indonesia Tbk (2019–2021).
- Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025 – present)

Concurrent Position

BNI
-

Other Companies/Institutions
-

QUALIFICATIONS, EDUCATION, AND WORK EXPERIENCE OF THE INTEGRATED GOVERNANCE COMMITTEE

BNI ensures that all members of the Integrated Governance Committee have met the individual requirement criteria, both general and specific, as stipulated in the Integrated Governance Committee Charter, which are as follows:

A. General Requirements
   1) Have integrity, good character and morals and sufficient work experience related to the committee's duties;
   2) Have no personal interests/connections that can have a negative impact and conflict of interest on Financial Services Institutions in the BNI Financial Conglomerate.

B. Competency Requirements
   1) Have adequate educational background, skills, knowledge and experience in banking or other financial services institutions;
   2) Be able to work together, have good and effective communication skills, and provide sufficient time to carry out their duties;
   3) Have sufficient knowledge and understanding of the principles and processes of implementing GCG in general, as well as laws and regulations in the banking sector and other financial services institutions, especially those related to the operational activities of banking and other financial services institutions.

QUALIFICATIONS, EDUCATION, AND WORK EXPERIENCE OF THE INTEGRATED GOVERNANCE COMMITTEE

With reference to the provisions above, the Bank ensures that the current chairman and all members of the Integrated Governance Committee have met the educational qualification and work experience criteria as explained in the table below:

Qualifications, Education, and Work Experience of the Integrated Governance Committee

Name Position Education Work Experience Areas of Expertise

Name	Position	Education	Work Experience	Areas of Expertise
Omar Sjawaldy Anwar	Chairman	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Accounting • Strategic Management • Finance • Technology
Tedi Bharata	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Public Administration • Finance • Human Resource Management • Information Management and Computer Systems
Vera Febyanthy	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Public Administration • Public Policy • Finance
Didik Junaedi Rachbini	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	Economy
Donny Hutabarat	Member	Educational background can be found in the Board of Commissioners Composition Diversity Section	Work experience can be found in the Board of Commissioners Composition Diversity Section	• Economy • Market & Treasury
Alwi Abdurrahman Shihab	Member	• Bachelor's Degree (S1) in Ushuluddin Akidah Philosophy from Al-Azhar University, Cairo, Egypt (1966); • Master's Degree (S2) in Ushuluddin (Theology) Akidah Philosophy from Al-Azhar University, Cairo, Egypt (1968); and • Doctorate (S3) in Philosophy of Faith from Ain Shams University, Cairo, Egypt (1990).	• Independent Commissioner of PT BNI Life Insurance (2021-present) • President Commissioner of PT Askrindo (Persero) (2017-2020) • Special Envoy of the President of the Republic of Indonesia for the Middle East and OIC (2016-2019) • Special Consultant in Marketing at PT Batutua Tembaga Raya, PT Indotan, and PT Indonesia Mid-East Consultancy (2015) • Special Advisor for Overseas Business Development at PT Pertamina (Persero) (2015) • Independent Commissioner of Asuransi Rama Jakarta (2007-2013) • Coordinating Minister for People's Welfare (2004-2005) • Minister of Foreign Affairs of the Republic of Indonesia (1999-2001)	Sharia Economics
Siti Haniatunnisa	Member	• Bachelor's Degree (S1) in Law from the International Islamic University of Malaysia (IIUM); • Master's Degree (S2) in Law from the University of Indonesia (UI); and • Currently pursuing a Doctoral Program (S3) in Law at the University of Indonesia (UI). • Obtained Certified in Risk Governance Professional (CRGP) certification from LSPMR.	• Chairman of Syeikh Nawawi Banten University (2016-present); • Member of the Supervisory Board of PT BRILife (2016-present); • Member of the Supervisory Board of PT Asuransi Jasindo Syariah (2017-present); • Member of the Supervisory Board of PT DPLK Muamalat (2018-present); • Member of the Supervisory Board of PT Bank Muamalat Indonesia (2019-present); • Member of the Supervisory Board of PT BNI Life Insurance (2020-present); and • Member of the Plenary Session of the Indonesian Ulema Council (2021-present).	• Law • Sharia Economics

Name	Position	Education	Work Experience	Areas of Expertise
Rudy Tandjung	Member	• Bachelor's Degree (S1) in Agricultural Economics from Bogor Agricultural University (1991); • Master's Degree (S2) MBA – International Business and Finance from Oklahoma City University/USA (1990).	• President Commissioner/Independent Commissioner of PT BNI Sekuritas (2024 – present); • Head of Consumer Banking, PT Bank DBS Indonesia (Nov 2019 – Dec 2023); • Head of Commercial Banking, PT Bank DBS Indonesia (Sept 2018 – Nov 2019); • Chief Operating Officer, PT Bank DBS Indonesia (March 2015 – September 2018); • Commissioner, PT Kustodian Sentral Efek Indonesia (June 2012 – June 2015); • Head of Transaction Banking, PT Bank Permata Tbk (January 2010 – March 2015).	• Economy • Capital Market
Eko Priyo Pratomo	Member	• Bachelor's Degree (S1) in Mechanical Engineering/ Aeronautics from the Bandung Institute of Technology (1988); • Master's Degree (S2) in Management from IPMI International Business School (1991).	• President Commissioner/Independent Commissioner of PT BNI Asset Management (April 2022 – present); • Senior Advisor of PT Mandiri Manajemen Investasi (2019 – 2020); • Director, CEO, Senior Advisor of PT BNP Paribas AM (1996 – 2018); • Deputy GM, Marketing Director of PT Graha Buana Cikarang (1995 – 1996); • Deputy Marketing Manager of PT KSCI - Misui Group (1992 - 1995); and • Lead Engineer of PT IPTN (1988 – 1990).	• Mutual Funds • Capital Markets • Finance • Economics
Suhartono	Member	Bachelor's Degree (S1) in Civil Law from Diponegoro University, Semarang, Indonesia (1982).	• President Commissioner & Independent Commissioner of PT BNI Multifinance (2023 – present); • Commissioner of PT Adiprana Sentosa Indovesco (2019); • Advisor to PT Koperasi Nusa Raya Cipta (2018); • Commissioner of PT Wahana Inti Narendra (2018); • President Commissioner of PT Mahesa Altra Sentosa (2018); • Commissioner of PT Asuransi Astra Buana (2017 – 2018); • President Director of PT Federal International Finance (2007–2017); • Vice President Director of PT Federal International Finance (2001–2007); • Marketing Director of PT Federal International Finance (1998–2001); • General Marketing Manager PT Federal International Finance (1997–1998); • Regional Manager PT Federal International Finance (Central Java, Yogyakarta, and East Java regions) (May 1, 1993 – 1997); • Branch Manager PT Federal International Finance (Semarang Branch) (1991–1993); • Branch Manager PT Mitra Pinasthika Mustika/MPM (Malang Branch) (1989–1990); and • Marketing Section Head PT Astra International (Honda Sales Operation Central Java Region) (1983–1989).	• Law • Economics • Financing • Human Resources
Rufina Tinawati Marianto		Bachelor's Degree (S1) in Architectural Engineering and Management Economics from UNIKA Parahyangan Bandung.	• Work experience includes: • Independent Commissioner of PT Bank Hibank Indonesia (2022-present). • Independent Commissioner of PT Bank Mayora (2016-2022). • Commercial Sales & Marketing Support Head of PT Bank OCBC NISP Tbk (2013-2014). • Executive VP Commercial Business Unit at PT Bank OCBC NISP Tbk (2012-2013). • Commercial Business Division Head at PT Bank OCBC NISP Tbk (2009-2011). • General Manager Commercial Jababeka at PT Bank Permata (2003-2006).	• Economics • Banking

Name	Position	Education	Work Experience	Areas of Expertise
Alih Suasono	Independent Member	• Bachelor's Degree (S1) from Gadjah Mada University • Master's Degree (S2) in Human Resource Management from Tanjungpura University	• Head of Small Credit Center Batam, PT Bank Negara Indonesia Tbk (2010–2012) • Head of Medium Credit Center Surabaya, PT Bank Negara Indonesia Tbk (2012–2013) • Head of Medium Credit Center Pekanbaru, PT Bank Negara Indonesia Tbk (2013–2016) • Head of Medium Credit Center Malang, PT Bank Negara Indonesia Tbk (2016–2017) • Head of Regional Banking Business Malang, PT Bank Negara Indonesia Tbk (2017–2019) • Deputy Head of Medium Enterprise Business Division, PT Bank Negara Indonesia Tbk (2019–2021) • Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025–present)	• Banking • Finance
Jhon Fernando Tamba	Independent Member	• Bachelor's Degree (S1) in Accounting from Gadjah Mada University • Master's Degree (S2) in Management from the University of Indonesia	• Deputy Head of Corporate & Multinational Business Division 2 (2019–2021) • Deputy Head of Corporate & MHE Credit Risk Division (2014–2019) • Deputy Division Head of Corporate Business Risk Division (2013–2014) • Group Head of Audit for Corporate Business Banking (2012–2013) • Head of Network Credit Audit Group (2010–2012) • General Manager of the Corporate Finance & Treasury Department at PT Adhi Karya (Persero) Tbk (2021–2023) • Independent Member of the Audit Committee of PT Bank Negara Indonesia (Persero) Tbk (2025 – present)	• Banking • Finance • Audit

STATEMENT OF INDEPENDENCE OF THE INTEGRATED GOVERNANCE COMMITTEE

The Integrated Governance Committee discharges its duties and reporting independently and is directly responsible to the Board of Commissioners of the Parent Company of the Financial Conglomerate (i.e., PIKK). BNI ensures that all Committee members from independent parties have met the following independence requirements:

1. Are parties outside BNI who do not have financial, management, share ownership and/or family relationships with the Board of Commissioners, Supervisory Board, Board of Directors and/or Controlling Shareholders of Financial Services Institutions in the BNI Financial Conglomerate, or relationships with Financial Services Institutions in the BNI Financial Conglomerate that may affect their ability to act independently. The financial, management, share ownership and/or family relationships referred to are in accordance with the definition set forth in the applicable laws and regulations;
2. Do not have any direct or indirect business relationships related to the business activities of Financial Services Institutions in the BNI Financial Conglomerate.
3. The Committee is required to sign an integrity pact which is a statement and commitment to comply with all provisions of laws and regulations and GCG principles.

By fulfilling all aspects of Independence above, all members of the Integrated Governance Committee are always able to provide fair and balanced assessments of all relevant conditions and are not influenced by personal interests or other parties in expressing their opinions.

Integrated Governance Committee Independency

Name	Independence Aspect				
	No Financial Relationship with the Board of Commissioners and Directors	No Management Relationship with BNI, Subsidiaries, or Affiliate Companies	No Share Ownership Relationship in BNI	No Family Relationship with the Board of Commissioners, Directors, and/or Fellow Members of the Integrated Governance Committee	Not Serving as an Official in Political Parties, Government Officials, or Government
Omar Sjawaldy Anwar	√	√	√	√	√
Tedi Bharata	√	√	√	√	√
Vera Febyanthy	√	√	√	√	√
Didik Junaedi Rachbini	√	√	√	√	√
Donny Hutabarat	√	√	√	√	√
Alwi Abdurrahman Shihab	√	√	√	√	√
Siti Haniatunnisa	√	√	√	√	√
Rudy Tandjung	√	√	√	√	√
Eko Priyo Pratomo	√	√	√	√	√
Suhartono	√	√	√	√	√
Rufina Tinawati Marianto	√	√	√	√	√
Alih Suasono	√	√	√	√	√
Jhon Fernando Tamba	√	√	√	√	√

INFORMATION ON CONCURRENT POSITIONS

As a commitment to transparency and accountability, BNI openly discloses information regarding the concurrent positions held by each member of the Integrated Governance Committee. This information is presented in full in the following table:

Name	Position in the Bank as EU	Position in Subsidiary Company	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	-	-	-	-
Tedi Bharata	Vice President Commissioner	-	-	-	-
Vera Febyanthy	Independent Commissioner	-	-	-	-
Didik Junaedi Rachbini	Independent Commissioner	-	-	Independent President Commissioner of PT Lippo Cikarang Tbk	-
Donny Hutabarat	Commissioner	-	-	-	-
Alwi Abdurrahman Shihab	-	Independent Commissioner of PT BNI Life Insurance	-	-	-
Siti Haniatunnisa	-	Sharia Supervisory Board of PT BNI Life Insurance	• DPS PT BRILife; • DPS PT DPLK Muamalat; and • DPS PT Bank Muamalat Indonesia.	-	-
Rudy Tandjung	-	President Commissioner/ Independent Commissioner of PT BNI Sekuritas	-	-	-

Name	Position in the Bank as EU	Position in Subsidiary Company	Position in Other Banks	Position in Other Public Companies	Position in Other State-Owned Enterprises
Eko Priyo Pratomo	-	President Commissioner/ Independent Commissioner of PT BNI Asset Management	-	-	-
Suhartono	-	President Commissioner and Independent Commissioner of PT BNI Multifinance	-	-	-
Rufina Tinawati Marianto	-	Independent Commissioner of PT Bank Hibank Indonesia	Independent Commissioner of PT Bank Hibank Indonesia	-	-
Alih Suasono	Independent Member	-	-	-	-
Jhon Fernando Tamba	Independent Member	-	-	-	-

INTEGRATED GOVERNANCE COMMITTEE MEETING

Meeting Implementation Policy

The meetings of the Integrated Governance Committee are conducted in accordance with the policies and procedures regulated in the Integrated Governance Committee Charter, as follows:

1. The Integrated Governance Committee must hold a meeting at least 1 (one) time in 2 (two) months.
2. The Integrated Governance Meeting can only be held if attended by at least 51% (fifty one per hundred) of the total number of members.
3. The Integrated Governance Committee Meeting is led by the Chairperson of the Integrated Governance Committee or the most senior member of the Integrated Governance Committee if the Chairperson of the Integrated Governance Committee is unable to attend.
4. If deemed necessary, the Integrated Governance Committee may invite other parties related to the agenda/discussion of the meeting to attend the Integrated Governance Committee Meeting.
5. The committee meeting must be attended by each Independent Commissioner from the Financial Services Institution in the BNI Financial Conglomerate who is a member of the Integrated Governance Committee. In the event that the relevant independent Commissioner is unable to attend the Integrated Governance Committee meeting, then another Commissioner who is not a member of the Integrated Governance Committee or an official at the relevant Financial Services Institution may be asked to attend the Integrated Governance Committee meeting by filling in the meeting attendance list, but is not counted in the attendance quorum and the number of votes taken to reach a decision at the meeting.
6. Decisions at the Committee meeting are made based on consensus.
7. In the event that consensus does not occur, decisions are made based on a majority vote. Meeting decisions are considered valid if approved by more than ½ (one half) of the total number of members of the Integrated Governance Committee present. The regulation of the voting rights of Committee members adheres to the principle of 1 (one) person 1 (one) vote.
8. Committee meetings may be held via teleconference, video conference, or other electronic media.
9. The results of the Committee meeting must be stated in the minutes of the meeting signed by all members of the Committee present and properly documented.
10. Dissenting opinions that occur in the meeting are clearly stated in the minutes of the meeting along with the reasons for the differences of opinion.
11. The attendance of Committee members in meetings is reported in the quarterly report and the annual report of the committee.

Frequency and Level of Attendance of Integrated Governance Committee Members in Meetings

Throughout 2025, the Integrated Governance Committee held 11 (eleven) meetings and 1 (one) internal consolidation. The internal consolidation was conducted due to the vacancy of the committee chairman/member from the PIKK (who was undergoing the OJK Fit & Proper Test) and was not calculated as a committee meeting agenda. The frequency of these meetings has complied with the provisions stipulated in the Integrated Governance Committee Charter. The following is the attendance data of BNI's Integrated Governance Committee members in these meetings throughout 2025, reflecting the level of participation and commitment of the members in performing their supervisory duties and responsibilities effectively and consistently.

Frequency and Level of Attendance of Integrated Governance Committee Members in Meetings

Name	Position	Number of Meetings	Attended	Percentage
Omar Sjawaldy Anwar[1]	Chairman	8	7	88%
Tedi Bharata[2]	Member	8	6	75%
Vera Febyanthy[3]	Member	4	4	100%
Didik Junaedi Rachbini[3]	Member	4	3	75%
Donny Hutabarat[4]	Member	2	1	50%
Alwi Abdurrahman Shihab	Member	11	8	73%
Siti Haniatunnisa	Member	11	6	55%
Rudy Tandjung	Member	11	10	91%
Eko Priyo Pratomo	Member	11	10	91%
Suhartono	Member	11	9	82%
Rufina Tinawati Marianto	Member	11	11	100%
Jhon Fernando Tamba[5]	Member	-	-	-
Alih Suasono[5]	Member	-	-	-
Pradjoto[6]	Chairman	3	1	33%
Askolani[6]	Member	3	3	100%
Robertus Billitea[6]	Member	3	1	33%
Mohamad Yusuf Permana[6]	Member	3	2	67%
Suminto[7]	Member	1	1	100%
Nurani Raswindriati[8]	Member	8	8	100%

1) Effective as Chair of the TKT Committee since June 30, 2025
2) Effective as Member of the TKT Committee since June 5, 2025
3) Effective as Member of the TKT Committee since August 13, 2025
4) Effective as a Member of the TKT Committee since October 16, 2025
5) Effective as a Member of the TKT Committee since December 18, 2025
6) Resigned as Chair/Member of the TKT Committee since February 20, 2025/March 26, 2025
7) Ceased to serve as a member of the TKT Committee as of October 8, 2025
8) Ceased to serve as a member of the TKT Committee as of September 30, 2025

Meeting Agenda

Throughout 2025, the Integrated Governance Committee held 11 (eleven) meetings and 1 (one) internal consolidation. The internal consolidation was conducted due to the absence of a committee chairman/member from the PIKK (who was undergoing the OJK Fit & Proper Test). The discussions regarding the meeting agendas and internal consolidation are as follows:

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
1	January 31, 2025	1. Integrated Financial Performance Evaluation for 2024 2. 2024 Synergy Evaluation: Parent Company and Subsidiaries & Between Subsidiaries 3. 2025 Strategic & Business Plan for Subsidiaries 4. 2025 Synergy Plan: Parent Company and Subsidiaries & Between Subsidiaries	1. Askolani (BNI Commissioner)[1)] 2. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 3. Siti Haniatunnisa (DPS BNI Life Insurance) 4. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 5. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 6. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 7. Nurani Raswindriati (Independent Party)[7)]	1. BNI Directors: • Director of FIN • Director of DIT • Director of WHI • Director of REB • Director of TOP 2. Other invited parties: • SSM Division • CPM Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
2	February 11, 2025	1. Evaluation of Integrated Risk Profile and Integrated Minimum Capital Requirements (KPMM) for the Second Semester of 2024 2. Evaluation of self-assessment results on Integrated Governance for the Second Semester of 2024	1. Pradjoto (President Commissioner/Independent Commissioner of BNI)[1)] 2. Mohammad Yusuf (Commissioner of BNI)[1)] 3. Askolani (Commissioner of BNI)[1)] 4. Siti Haniatunnisa (DPS BNI Life Insurance) 5. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 6. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 7. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 8. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 9. Nurani Raswindriati (Independent Party)[7)]	1. BNI Director: • Dir RMT • Dir HCC 2. Other invited parties: • Risk Monitoring Committee • Hari Satriyono (BNI Finance Commissioner) • ERM Division • CMP Division • SSM Division
3	March 18, 2025	1. Evaluation of the effectiveness of the Integrated Internal Control System (SPI) for the second semester of 2024. 2. Evaluation of the effectiveness of the Integrated Audit Work Unit for the second semester of 2024. 3. Improvement of the quality and number of auditors at subsidiaries. 4. Results of internal audits of subsidiaries and follow-up actions.	1. Mohammad Yusuf (BNI Commissioner)[1)] 2. Robertus Billitea (BNI Commissioner)[1)] 3. Askolani (BNI Commissioner)[1)] 4. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 5. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 6. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 7. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 8. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 9. Nurani Raswindriati (Independent Party)[7)]	1. BNI Director: • Deputy Director 2. Other invited parties: • IAD Division • SSM Division
4	June 3, 2025	Consolidation:[8)] 1. Financial Performance of Subsidiaries, including the realization of Synergies with the Main Entity (i.e., PIKK) and between Subsidiaries for the first quarter of 2025. 2. Issues in each Subsidiary regarding the results of the Evaluation of the Implementation of Risk Management, Compliance, and Audit for the first quarter of 2025.	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Tedi Bharata (Vice President Commissioner of BNI)[3)] 3. Vera Febyanthy (Independent Commissioner of BNI)[4)] 4. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 5. Donny Hutabarat (Commissioner of BNI)[5)] 6. Suminto (Commissioner of BNI[6] 7. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 8. Siti Haniatunnisa (DPS BNI Life Insurance) 9. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 10. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 11. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 12. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 13. Nurani Raswindriati (Independent Party)[7)]	1. Director of BNI: • Dir FIN 2. SEVP BNI: • SIT 3. Other invited parties: • SSM Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
5	July 1, 2025	Evaluation of the Implementation of Information Technology (IT) and Cyber Security in each Subsidiary, and Follow-up on the IT Audit Results of each Subsidiary.	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Tedi Bharata (Vice President Commissioner of BNI)[3)] 3. Vera Febyanthy (Independent Commissioner of BNI)[4)] 4. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 5. Donny Hutabarat (Commissioner of BNI)[5)] 6. Suminto (Commissioner of BNI[6] 7. Siti Haniatunnisa (DPS BNI Life Insurance) 8. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 9. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 10. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 11. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 12. Nurani Raswindriati (Independent Party)[7)]	1. BNI Directors: • Director of ITE • Director of FIN 2. BNI SEVP: • SIT 3. Other invited parties: • Eko Yuliantoro (BNI Life Commissioner) • Masaki Fuse (Director of BNI Life Insurance) • Teddy Wishadi (Director of BNI Sekuritas) • Ade Yusriansyah (Director of BNI AM) • Prihadiyanto (Director of Bank Hibank) • Legendariah (Director of BNI Finance) • Lugas Prancafitri (Director of BNI Ventura) • SSM Division • IAD Division • CISO Division • STA Division
6	July 29, 2025	Turnaround Strategy for Subsidiaries	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Tedi Bharata (Vice President Commissioner of BNI)[3)] 3. Vera Febyanthy (Independent Commissioner of BNI)[4)] 4. Donny Hutabarat (Commissioner of BNI)[5)] 5. Suminto (Commissioner of BNI[6] 6. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 7. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 8. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 9. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 10. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 11. Nurani Raswindriati (Independent Party)[7)]	1. BNI Directors: • Director of FIN • Director of RMT 2. Other invited parties: • Ita Tetralastwati (Commissioner of BNI Finance) • SSM Division • RTC Division • ERM Division
7	August 5, 2025	Integrated Risk Profile Assessment, Integrated KPMM for the First Semester of 2025, and Integrated Risk Appetite Statement (RAS) Assessment for 2025	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Tedi Bharata (Vice President Commissioner of BNI)[3)] 3. Vera Febyanthy (Independent Commissioner of BNI)[4)] 4. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 5. Donny Hutabarat (Commissioner of BNI)[5)] 6. Suminto (Commissioner of BNI[6] 7. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 8. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 9. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 10. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 11. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 12. Nurani Raswindriati (Independent Party) [7)]	1. Director of BNI: • Dir RMT 2. Other invited parties: • Risk Monitoring Committee • ERM Division • SSM Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
8	August 5, 2025	Evaluation of Self-Assessment Results on the Integrated Governance of BNI Financial Conglomerate for the First Semester of 2025	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Tedi Bharata (Vice President Commissioner of BNI)[3)] 3. Vera Febyanthy (Independent Commissioner of BNI)[4)] 4. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 5. Donny Hutabarat (Commissioner of BNI)5 6. Suminto (Commissioner of BNI[)6] 7. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 8. Siti Haniatunnisa (DPS BNI Life Insurance) 9. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 10. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 11. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 12. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 13. Nurani Raswindriati (Independent Party)[7)]	1. Director of BNI: • Dir HCC 2. Other invited parties: • CMP Division • ERM Division • SSM Division
9	September 16, 2025	a. Evaluation of the effectiveness of the Integrated Internal Control System (SPI) for the first semester of 2025 period. b. Evaluation of the effectiveness of the Integrated Audit Work Unit for the first semester of 2025 period. c. Improvement of the quality and quantity of Auditors at Subsidiaries. nternal Audit results of Subsidiaries and their follow-up actions.	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Tedi Bharata (Vice President Commissioner of BNI)[3)] 3. Vera Febyanthy (Independent Commissioner of BNI)[4)] 4. Donny Hutabarat (Commissioner of BNI)[5)] 5. Suminto (Commissioner of BNI[)6] 6. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 7. Siti Haniatunnisa (DPS BNI Life Insurance) 8. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 9. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank) 10. Nurani Raswindriati (Independent Party)[7)]	1. BNI Director: • Managing Director 2. Other invited parties: • Henny Woe (BNI AM Commissioner) • Ita Tetralastwati (BNI Finance Commissioner) • SSM Division • IAD Division
10	October 14, 2025	Evaluation of the Implementation of Integrated Compliance Functions at BNI Financial Conglomerate and Evaluation of the Implementation of APU PPT & PPPSPM Programs at Each Subsidiary Company within BNI Financial Conglomerate	1. Tedi Bharata (Vice President Commissioner of BNI)[3)] 2. Vera Febyanthy (Independent Commissioner of BNI)[4)] 3. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 4. Donny Hutabarat (Commissioner of BNI)[5)] 5. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 6. Siti Haniatunnisa (DPS BNI Life Insurance) 7. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 8. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 9. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank)	1. BNI Director: • Dir HCC 2. BNI SEVP: • SLV 3. Other invited parties: • Yoga Mulya (Dir BNI Sekuritas) • CMP Division • AML Division • SSM Division
11	November 4, 2025	Roadmap for Strengthening Anti-Fraud Strategies in Subsidiaries: Evaluation, Recommendations for Improvement, and Future Development Plans within the BNI Financial Conglomerate	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Vera Febyanthy (Independent Commissioner of BNI)[4)] 3. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 4. Donny Hutabarat (Commissioner of BNI)[5)] 5. Alwi Abdurrahman Shihab (Independent Commissioner of BNI Life Insurance) 6. Siti Haniatunnisa (DPS BNI Life Insurance) 7. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 8. Suhartono (President Commissioner/Independent Commissioner of BNI Finance) 9. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas)	1. BNI Directors: • Director of RMT • Director of FIN 2. Other invited parties: • AFR Division • SSM Division • IAD Division

No.	Date	Meeting Agenda	Integrated Governance Committee Member	Invitee
12	December 16, 2025	Evaluation of Integrated Technology Strategy and BNI Guidelines for Subsidiaries	1. Omar Sjawaldy Anwar (President Commissioner/ Independent Commissioner of BNI)[2)] 2. Vera Febyanthy (Independent Commissioner of BNI)[4)] 3. Didik Junaedi Rachbini (Independent Commissioner of BNI)[4)] 4. Eko Priyo Pratomo (President Commissioner/ Independent Commissioner of BNI AM) 5. Rudy Tandjung (President Commissioner/ Independent Commissioner of BNI Sekuritas) 6. Rufina Tinawati Marianto (President Commissioner/ Independent Commissioner of Bank Hibank)	1. BNI Directors: • Director of ITE • Director of FIN • Director of HCC 2. BNI SEVP: • SIT • SLV 3. Other invited parties: • STA Division • SSM Division • CMP Division

Notes:
1) Resigned as Chair/Member of the TKT Committee effective February 20, 2025/March 26, 2025
2) Effective as Chair of the TKT Committee since June 30, 2025
3) Effective as a Member of the TKT Committee since June 5, 2025
4) Effective as a Member of the TKT Committee since August 13, 2025
5) Effective as a Member of the TKT Committee since October 16, 2025
6) Effectively serving as a Member of the TKT Committee since August 13, 2025 and ceased serving as a Member of the TKT Committee since October 8, 2025
7) Ceased to serve as a member of the TKT Committee as of September 30, 2025
8) The internal consolidation agenda was carried out in connection with the absence of a chairperson/committee member from PIKK (currently undergoing the OJK Fit & Proper Test) and was not counted as a committee meeting agenda.

INTEGRATED GOVERNANCE COMMITTEE REPORTING

BNI Integrated Governance Committee periodically prepares and submits reports to the Board of Commissioners as part of the reporting mechanism, to ensure transparency, accountability, and the effectiveness of the supervisory function's implementation.

INTEGRATED GOVERNANCE COMMITTEE MEMBER COMPETENCY IMPROVEMENT PROGRAM IN 2025

Throughout 2025, all members of the Integrated Governance Committee participated in various education and training programs aimed at updating insights and enhancing competencies, with the details as follows:

Type of Training and Competency Development Material	Implementation Date	Organizer
Alwi Abdurrahman Shihab – Committee Member/Independent Commissioner of PT BNI Life Insurance		
Determining the Risk Strategy in the Challenges of Environmental, Social and Macro-Economic Changes	January 7, 2025	LSPMR
Inauguration & Seminar "PSAK 117 & KUHD 251"	February 20, 2025	Indonesian Association of Independent Insurance Commissioners
Insurance Revolution: How AI is Transforming the Underwriting Process and Optimizing Business Processes	April 24, 2025	OJK Institute
National Sectoral Development Risk Management for Ministries/Institutions	April 30, 2025	Way Academy in collaboration with IRMAPA
Smart Investing and Transacting in the Digital Era	May 20, 2025	PIISEI
Implementation of ICoFR (Internal Control over Financial Reporting): "How to Understand and Test the Effectiveness of Controls over Corporate Financial Reporting"	May 20, 2025	GRC Management
Customer Experience: Strategies for Success in the Digital Era	May 22, 2025	OJK Institute
Risk-Based Budgeting: "Prevention, Detection & Investigation of Fraudulent Financial Reporting"	June 14, 2025	IAMI in collaboration with IRMAPA & ICMA
One-Day Workshop on Laws and Their Relation to Anti-Fraud Implementation	June 30, 2025	GRC Management
Governance, Risk & Compliance for Executive (GRCE) Executive Briefing	August 11–12, 2025	LPPI
Risk Governance Summit	August 19, 2025	OJK Institute
GRC Summit	August 22, 2025	Way Academy bersama IRMAPA

Type of Training and Competency Development Material	Implementation Date	Organizer
Compliance Forum	September 16, 2025	BNI University
Siti Haniatunnisa – Committee Member/Sharia Supervisory Board Member of PT BNI Life Insurance		
Qualification Level 4 in Risk Management	March 5–6, 2025	Sharia Financial Professional Certification Institute
Discussion and Stipulation of Draft Fatwa	July 18, 2025	DSN – MUI
Governance, Risk & Compliance for Executive (GRCE) Executive Briefing	August 11–12, 2025	LPPI
Compliance Forum	September 16, 2025	BNI University
Rudy Tandjung – Committee Member/President Commissioner/Independent Commissioner of PT BNI Sekuritas		
PPL Dirkom Risk Management	April 15, 2025	APEI
Governance, Risk & Compliance for Executive (GRCE) Executive Briefing	August 11–12, 2025	LPPI
Risk & Governance Summit OJK	August 20, 2025	OJK
Compliance Forum	September 16, 2025	BNI University
Eko Priyo Pratomo – Committee Member/President Commissioner/Independent Commissioner of PT BNI Asset Management		
Governance, Risk & Compliance for Executive (GRCE) Executive Briefing	August 11–12, 2025	LPPI
OJK Webinar: "The Sustainable Financing Opportunities in the Indonesian Insurance Industry"	October 2, 2025	OJK
OJK Webinar: "Risk Appetite and Risk Culture: Key Pillars in Strengthening Risk Management in the Financial Sector"	October 9, 2025	OJK
OJK Webinar: "The Role of Digital Forensics in Handling and Uncovering Financial Crimes"	October 16, 2025	OJK
Suhartono – Committee Member/President Commissioner and Independent Commissioner of PT BNI Multifinance		
Online Seminar Economic Outlook 2026	September 2, 2025	Indonesian Financing Companies Association
Compliance Forum	September 16, 2025	BNI University
Risk Management Training Qualification JK 5	December 23, 2025	BNI Finance – PT Arfaidhams Secret
Rufina Tinawati Marianto – Committee Member/Independent Commissioner of PT Bank Hibank Indonesia		
BNI Investor Daily Round Table (BNI IDRT)	January 15, 2025	BNI
APU & PPT Refresher	May 26, 2025	Hibank
Secure Your Data: Best Practices in Cyber Security and Data Management	June 10, 2025	Hibank
OJK Webinar: "Safe Strategies for Crypto Asset and Digital Financial Transactions: Personal Data Protection and the Impact of Biometric Technology in Indonesia"	June 19, 2025	OJK
Breaking the Scam Chain: Synergy and Strategies for Financial Consumer Protection	June 26, 2025	OJK
Master Class Corporate Governance – Governance Oversight Professional (GOP)	August 13–14, 2025	CRMS
Compliance Forum: Decision-Making Based on the Business Judgement Rule Principle in the Framework of Good Corporate Governance and Anti-Corruption	September 16, 2025	BNI University
HiBoard Beyond: Oversight in the Digital Bank	October 2–3, 2025	Hibank & LPPI
Alih Suasono – Independent Committee Member		
Onboarding of the Integrated Governance Committee	December 18, 2025	BNI Corporate Secretary
Jhon Fernando Tamba – Independent Committee Member		
Onboarding of the Integrated Governance Committee	December 18, 2025	BNI Corporate Secretary

KPI ACHIEVEMENT OF THE INTEGRATED GOVERNANCE COMMITTEE 2025

The performance of the Integrated Governance Committee is evaluated based on the KPIs mutually agreed upon at the beginning of the year as the performance benchmark. In 2025, the Integrated Governance Committee successfully achieved 100% of its set KPI targets. This achievement demonstrates the Committee's success in ensuring that integrated governance principles are implemented effectively across all business group entities, aligning policies and procedures between entities, and improving the quality of coordination and governance reporting to the Board of Commissioners and regulators.

WORK PROGRAM AND IMPLEMENTATION OF COMMITTEE DUTIES 2025

Throughout 2025, the Integrated Governance Committee performed its supervisory and monitoring functions regarding governance implementation within the BNI Financial Conglomerate through periodic meetings, discussions of management reports, and evaluations of entity compliance with integrated governance principles. The Committee demonstrated its commitment by providing strategic recommendations to the Board of Commissioners of the Parent Company of the Financial Conglomerate (i.e., PIKK) regarding the strengthening of governance structures, risk mitigation, and the enhancement of inter-entity coordination. All results of the Committee's work were submitted periodically to the Board of Commissioners as a form of accountability and transparency.

The following are the key activities of the Integrated Governance Committee in 2025:

1. Enhancing the quality of the integrated compliance function by conducting self-assessments of the compliance culture implementation in each BNI Subsidiary, evaluating the implementation of anti-fraud strategies, the Whistleblowing System, Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation Financing of Weapons of Mass Destruction (AML-CFT-PPWMP) within the BNI financial conglomerate, and evaluating the implementation of the integrated compliance function.
2. Improving the quality of integrated internal control by ensuring that the quality and quantity of auditors in Subsidiaries are adequate, evaluating the effectiveness of the integrated internal control system, and evaluating the internal audit results of Subsidiaries along with their follow-up actions.
3. Enhancing the quality of integrated risk management implementation by monitoring action plans, correcting root causes in integrated risk management, evaluating the integrated risk profile and the Quality of Integrated Risk Management Implementation (KPMR), and reviewing the General Policy for Integrated Risk Management.
4. Maintaining the quality of Integrated Governance implementation by evaluating the structure, process, and results of integrated governance, reviewing and evaluating the Integrated Governance Guidelines, and increasing knowledge of best practices in integrated governance implementation.
5. Monitoring the effectiveness of integrated governance results by evaluating integrated financial performance, as well as evaluating synergy plans between BNI and Subsidiaries, and synergies between Subsidiaries.

Referring to the strategy and work program of the Integrated Governance Committee, the execution of the Committee's activities and duties was carried out through the following mechanisms:

1. Holding Integrated Governance Committee Meetings, including inviting relevant Directors and relevant divisions/units;
2. Attending meetings of the Board of Commissioners and joint meetings of the Board of Commissioners and Board of Directors on agendas related to the duties of the Integrated Governance Committee;
3. Conducting studies/evaluations/reviews outside of meeting forums.

All meeting results as well as monitoring, evaluation, and review activities conducted by the Integrated Governance Committee were submitted to the Board of Commissioners in the form of reports and recommendations, both in writing and within meeting forums. The Committee also submitted suggestions, opinions, and recommendations in writing to the Board of Directors for follow-up. Throughout 2025, the Integrated Governance Committee held 11 (eleven) meetings and 1 (one) internal consolidation. The internal consolidation was conducted due to the vacancy of the committee chairman/member from the PIKK (who was undergoing the OJK Fit & Proper Test).

The activities of the Integrated Governance Committee during 2025 generally covered the following matters:

1. Performance Evaluation & Strategic Planning:
   Supervision through a comprehensive evaluation of integrated financial performance and synergy between the parent company and subsidiaries throughout 2024, as well as discussions on strategic plans, business plans, and inter-company synergy plans for 2025.
2. Risk Management & Governance:
   Supervision through the evaluation of the Integrated Risk Profile and Integrated Minimum Capital Adequacy Requirement (KPMM), as well as evaluating the results of self-assessments on the implementation of Integrated Governance.
3. Internal Control:
   Supervision through evaluating the effectiveness of the Internal Control System (SPI) and the Integrated Audit Work Unit, and discussing improvements in the quality/quantity of auditors and the follow-up of internal audit results in subsidiaries.
4. Information Technology & Cybersecurity:
   Supervision of the evaluation of Information Technology implementation, Cyber Security, and follow-up on IT audits in subsidiaries, as well as monitoring integrated strategy by evaluating integrated technology strategies and BNI's guidelines for subsidiaries.
5. Compliance & Anti-Fraud:
   Compliance Program implementation through the evaluation of the integrated compliance function and the implementation of the AML-CFT and PPWMP programs. This also included discussing the roadmap for strengthening anti-fraud strategies, including evaluations and future development plans.

INTEGRATED GOVERNANCE COMMITTEE EVALUATION OF THE IMPLEMENTATION OF INTEGRATED GOVERNANCE OF BNI FINANCIAL CONGLOMERATE

Throughout 2025, the Integrated Governance Committee conducted a comprehensive evaluation of the implementation of integrated governance within the BNI Financial Conglomerate. This evaluation was carried out in accordance with the mandate of the Integrated Governance Committee Charter and OJK regulations regarding financial conglomerate governance. The review results indicate that governance principles—encompassing transparency, accountability, responsibility, independence, and fairness—have been consistently applied by the Parent Company of the Financial Conglomerate (i.e., PIKK) and its subsidiaries. All entities also maintained alignment in policies and procedures, particularly in risk management, compliance, and internal control.

INTEGRATED GOVERNANCE COMMITTEE WORK PLAN FOR 2026

The Integrated Governance Committee has established its 2026 work plan with a focus on the following strategic priorities:

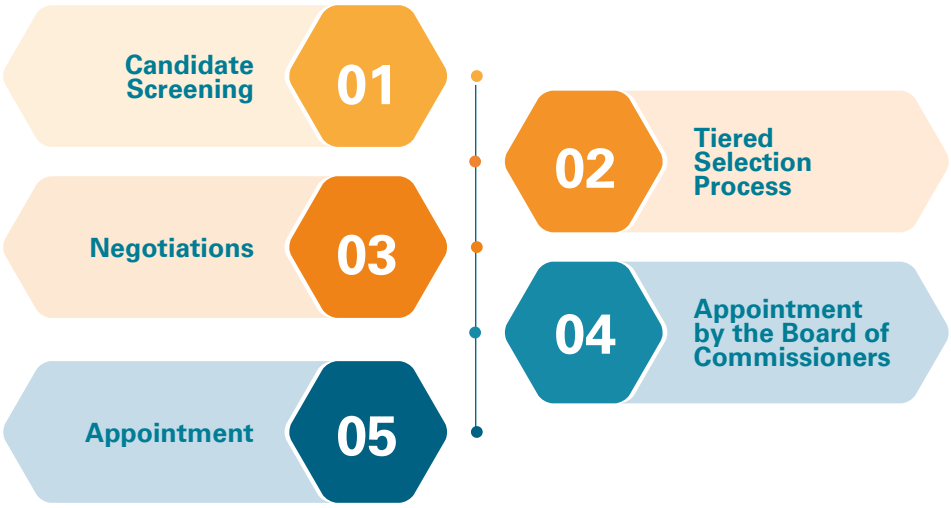
1. Strengthening the Governance Pillar: Aimed at encouraging the achievement of integrated governance with a "Good" rating through monitoring financial performance, evaluating strategic plans, and increasing synergy between the Parent Company of the Financial Conglomerate (i.e., PIKK) and Subsidiaries.
2. Improving the Quality of the Risk & Compliance Pillar: To ensure the effective implementation of integrated risk management, including the evaluation of risk profile self-assessments and minimum capital adequacy requirements, as well as compliance functions covering the implementation of Anti-Money Laundering and Countering the Financing of Terrorism (AML-CFT) programs, Anti-Bribery Management Systems (SMAP), and anti-fraud strategies.
3. Optimizing the Internal Control Pillar: Focusing on improving the quality of integrated internal control and the effectiveness of audits at Subsidiaries to ensure reporting reliability and operational compliance.
4. Enhancing the Performance Effectiveness of the Integrated Governance Committee

REMUNERATION OF MEMBERS OF THE INTEGRATED GOVERNANCE COMMITTEE

[ACGS C.3.4]

The remuneration policy for members of the Integrated Governance Committee who are part of the Board of Commissioners of the Parent Entity, the Board of Commissioners of Subsidiaries, and the Sharia Supervisory Board of Subsidiaries is integrated with the honorarium provided to the Board of Commissioners and/or the Sharia Supervisory Board of Subsidiaries, with no special honorarium allocated to individual committee members. Meanwhile, the honorarium for independent (NonCommissioner) committee members is determined by the Board of Commissioners, with a maximum amount set at 20% of the President Director's salary, and no additional income beyond this honorarium is provided. This policy aligns with the provisions of Minister of SOEs Regulation No. PER-3/MBU/03/2023 dated March 20, 2023, concerning the Organization and Human Resources of State-Owned Enterprises.

Procedures for Replacing Members of Committees Under the Board of Commissioners



In order to strengthen the supervisory function and ensure sustainable corporate governance, the Company maintains a systematic mechanism for the replacement of Independent Committee members for committees under the Board of Commissioners. This procedure is conducted transparently and accountably through the following stages:

- **Candidate Recruitment,** The process begins with the identification and sourcing of candidates by the Company's Recruiter. The primary focus of this stage is to attract professional candidates with credible track records, ensuring the fulfillment of competency and eligibility requirements in accordance with regulations, as well as fostering a diversity of perspectives and independence within the committee structure.
- **Multi-Tiered Selection Process,** Sourced candidates are required to undergo a series of selection processes to ensure their competencies align with regulatory requirements and organizational needs. This includes administrative screening, technical competency assessments related to the committee's specific scope of duties, and interviews conducted by the Board of Commissioners.
- **Negotiation of Employment Terms and Remuneration**, After passing the competency selection stage, the selected candidate enters the negotiation phase. This process involves discussions regarding rights, obligations, working terms, and the remuneration package, which is structured with due regard to industry standards and the Company's applicable regulations.
- **Deliberation and Approval by the Board of Commissioners**, The Board of Commissioners conducts an internal deliberation to review the overall results of the selection and negotiation process. The outcome of these discussions is formalized in a Board of Commissioners Decree (SK), which serves as the legal basis for the appointment of the selected candidate.
- **Appointment by the Board of Directors,** This is the final stage of the appointment procedure. Based on the Board of Commissioners Decree, the Board of Directors shall officially

Supporting Organs of the Board of Commissioners

The Board of Commissioners is assisted by the Board of Commissioners Secretariat, led by the Secretary of the Board of Commissioners, to facilitate seamless administrative process and operational activities related to the oversight and advisory functions. The establishment of this supporting organ refers to the applicable laws and regulations governing public companies, the banking sector, and state owned enterprises.

SECRETARY OF THE BOARD OF COMMISSIONERS

The Secretary of the Board of Commissioners is a supporting organ appointed and dismissed by the Board of Commissioners through the latter's Decree to, and is directly accountable to the Board of Commissioners. The position is held by an external party to the Bank and leads the BNI Board of Commissioners Secretariat, which is responsible for providing administrative and operational support to ensure the effective performance of the Board of Commissioners' functions. In carrying out its duties, the Secretary of the Board of Commissioners is assisted by staff drawn from both external parties and internal employees of the Bank.

Legal Basis for Establishment

The establishment and existence of the Secretary of the Board of Commissioners within BNI's corporate governance structure refer to Regulation of the Minister of State Owned Enterprises No. PER 3/ MBU/03 2023 on the Organs and Human Resources of State Owned Enterprises, which regulates the Board of Commissioners Secretariat and the staff of the Secretary of the Board of Commissioners.

Work Guidelines and Procedures

In carrying out secretarial duties and responsibilities, the Secretary of the Board of Commissioners and staff are required to comply with the Guidelines and Procedures and Regulations of the Secretariat of the Board of Commissioners, which have been stipulated in the Board of Commissioners Decree No. KEP/041/ DK/2017 dated September 28, 2017, concerning Guidelines and Procedures for the Secretariat of the Board of Commissioners. In general, the charter regulates the following matters:

1. Appointment and Position of Secretary to the Board of Commissioners;
2. Term of Office of the Secretary to the Board of Commissioners, who is from outside the bank, and the Board of Commissioners' Secretariat Staff;
3. Requirements for Secretary to the Board of Commissioners;
4. Remuneration of the Secretary to the Board of Commissioners, who is from outside the bank, and the Board of Commissioners' Secretariat Staff;
5. Duties of the Secretariat and Secretary to the Board of Commissioners;
6. Access to and confidentiality of information;
7. Working time of the Secretary to the Board of Commissioners, who is from outside the bank, and the Board of Commissioners' Secretariat Staff;
8. Performance assessment of the Board of Commissioners Secretariat;
9. Prohibition of concurrent positions;
10. Mechanism for Coordinating the Board of Commissioners' Secretariat with the Corporate Secretary and committees under the Board of Commissioners.

Profile of the Secretary of the Board of Commissioners

The Secretary of the Board of Commissioners of BNI is currently held by Muhammad Yusuf, who was appointed pursuant to the Board of Commissioners' Decree No. KEP/14/DK/2025 dated August 21, 2025.



Muhammad Yusuf
Secretary of the Board of Commissioners

Age
43 years old as of December 31, 2025

Citizenship
Indonesian citizen

Domicile
Jakarta, Indonesia

Educational Background
- Diploma in Accounting from the State College of Accountancy (2003)
- Bachelor's Degree in Accounting from Universitas Indonesia (2007)
- Master's Degree in Accounting from Universitas Indonesia (2011)

Legal Basis of Appointment
Appointed as Secretary of the Board of Commissioners of BNI pursuant to the Board of Commissioners' Decree No. KEP/14/DK/2025 dated August 21, 2025

Term of Office
2025 - Present

Certification and/or Training
- Mergers and Their Impact on Corporate Performance Improvement: A Case Study of Pelindo and the Urgency of Maritime Integration by the Ministry of State-Owned Enterprises (2025)
- Enhancing Corporate Governance of State-Owned Enterprises in Indonesia oleh Organization for Economic Co-operation and Development (OECD) (2025)

Work Experience
- Staff Secretary of the Board of Commissioners of PT Bank Rakyat Indonesia (Persero) Tbk (2015-2016)
- Secretary of the Board of Commissioners of PT Surveyor Indonesia (2016-2017)
- Member of the Audit Committee of PT Rajawali Nusantara Indonesia (Persero) (2019-2020)
- Secretary of the Board of Commissioners of PT Rajawali Nusantara Indonesia (Persero) (2019-2020)
- Controller for Telecommunications Services Sector, Ministry of State Owned Enterprises (2020-2021)
- Coordinator for Tourism and Supporting Services Sector, Ministry of State Owned Enterprises (2021-2023)
- Secretary of the Board of Commissioners of PT Aviasi Pariwisata Indonesia (Persero) (2022-2025)
- Coordinator for Infrastructure Services Sector, Ministry of State Owned Enterprises (2023-2024)

Concurrent Position
Coordinator for Plantation and Forestry Industry Sector, State Owned Enterprises Regulatory Body (2024 - present)

Secretary of the Board of Commissioners Requirements

BNI has established individual criteria and requirements that must be met by the Secretary of the Board of Commissioners, as follows:

1. Understand SOE management, monitoring, and development systems;
2. Has good integrity;
3. Understands the secretariat function;
4. Has the ability to communicate and coordinate properly; and
5. Has sufficient time to perform the duties at the Bank.

Secretary of the Board of Commissioners Duties and Responsibilities

In accordance with the Guidelines and Rules of Procedure of the Board of Commissioners Secretariat, the Secretary of the BNI Board of Commissioners performs the following duties and responsibilities:

1. Coordinating the Board of Commissioners Secretariat duties in performing the following duties:
   a. Preparing meetings, including briefing sheets for the Board of Commissioners;
   b. Preparing minutes of the Board of Commissioners' meeting according to the Bank's Articles of Association, including attending and preparing Minutes of joint meetings of the Board of Commissioners and the Board of Directors;
   c. Administering the Board of Commissioner's documents either incoming letters, outgoing letters, minutes of meetings, or any other documents;
   d. Drafting the Board of Commissioners Work Plan and Budget; and
   e. Drafting the Board of Commissioners' Reports.
2. In addition to performing duties stated in number 1 above, the Secretary of the Board of Commissioners as the head of the Board of Commissioners Secretariat performs the following duties:
   a. Ensuring that the Board of Commissioners complies with the laws and regulations and implements Good Corporate Governance principles;
   b. Providing information needed by the Board of Commissioners periodically or at any time when requested;
   c. Coordinating Committee members, if necessary, to ensure the ease of the Board of Commissioners' duties;
   d. Becoming the liaison officer between the Board of Commissioners and other parties;

e. Performing other duties given by the Board of Commissioners, among others but not limited to:
   i. Coordinating the preparation of draft Decrees for the Board of Commissioners;
   ii. Coordinating the studies/reviews required by the Board of Commissioners;
   iii. Accompanying the Board of Commissioners on work visits/official trips to work units within the Company, and coordinating with committees under the Board of Commissioners in preparing the Board of Commissioners reports on the work visits/official trips; and
   iv. Accompanying the Board of Commissioners in meetings with the regulators or the Bank supervisors related to the Board of Commissioners duties and obligations as the Company's supervisor.

3. In the framework of administrative order and good corporate governance implementation, the Board of Commissioners Secretariat must ensure that documents reflect the Board of Commissioners' activities, and are well kept at the Bank.

Secretary of the Board of Commissioners Prohibition of Concurrent Positions

Secretaries and staff of the BNI Board of Commissioners Secretariat who come from external parties are not permitted to concurrently serve as:

1. Members of the Board of Commissioners/ Supervisory Board of another BUMN/Company;
2. Secretary/Staff Secretary to the Board of Commissioners in State-Owned Enterprises (BUMN) or other companies;
3. Other committee members in the Company; and/or;
4. Committee members in BUMN/other companies.

Board of Commissioners Secretary Competency Improvement Program 2025

In 2025, the Secretary of the Board of Commissioners and staff have carried out the following education or training:

Type of Training and Competency Development Program	Date of Implementation	Location	Organizer
Merger and Its Impact on Enhancing Corporate Performance: A Plenary Study on the Urgency of Integration A Case Study of Pelindo and the Urgency of Maritime Integration	April 30, 2025	Jakarta	Ministry of State-Owned Enterprises
Executive Refreshment for Top Level Management 2025 (1st and 2nd Series)	May 16 and May 20, 2025	Jakarta	Lembaga Pengembangan Perbankan Indonesia (LPPI)
Enhancing Corporate Governance of State Owned Enterprises in Indonesia	May 20, 2025		Organization for Economic Co-operation and Development (OECD)
Certificate in Sustainability for Finance	November 19, 2025	Jakarta	Ikatan Akuntan Indonesia (IAI)

Implementation of the Duties of Secretary of the Board of Commissioners in 2025

Throughout 2025, the Secretary of the Board of Commissioners played an active role in ensuring that all oversight and advisory activities of the Board of Commissioners were carried out effectively. This role was manifested through the following series of duties and activities:

1. Assist in preparing the 2025 Board of Commissioners Work Plan and the 2025 Board of Commissioners Work Plan Realization Report;
2. Assist in the preparation of the draft Report of the Board of Commissioners, which is the obligation of the Board of Commissioners in accordance with applicable regulatory provisions, including:
   a. Reports to the Ministry of SOE Republik Indonesia quarterly;
   b. Report to the Financial Services Authority;
   c. Report to Bank Indonesia;
   d. Board of Commissioners work visit report.
3. Monitor, review, and inform the development of the latest statutory regulations to be submitted to the Board of Commissioners, including the creation, renewal, or adjustment of Board of Commissioners Decrees based on applicable statutory regulations.
4. Coordinate and organize Board of Commissioners Meetings and Joint Board of Commissioners Meetings with the Board of Directors, including preparing meeting schedules and meeting materials, compiling and administering minutes of Board of Commissioners meetings, conveying suggestions and opinions of the Board of Commissioners based on the results of Board of Commissioners meetings to the Board of Directors, and monitoring the follow-up to the Board of Commissioners' suggestions and opinions.

5. Assist and support the implementation of the duties of committees under the Board of Commissioners as part of the duties of the Board of Commissioners based on applicable regulations, including:
a. Coordinating the division of tasks of committees under the Board of Commissioners;
b. Coordinate and prepare meetings for committees under the Board of Commissioners, including preparing meeting materials, compiling and administering minutes of meetings, and conveying suggestions and opinions on the results of evaluations and committee meetings to the Board of Commissioners as input;
c. Monitor the implementation of the Work Plan of committees under the Board of Commissioners; and
d. Ensure completion of reports from committees under the Board of Commissioners.
6. Carry out administrative duties related to the smooth running of the Board of Commissioner's duties, namely management, storage, and administration of Minutes of Meetings of the Board of Commissioners and Meetings of the Board of Commissioners with the Board of Directors, as well as Minutes of meetings of committees under the Board of Commissioners, documents/correspondence from the Commissioner to the Board of Directors, and other parties, including preparing drafts of approval letters as well as strategic input/suggestions from the Board of Commissioners, which are submitted to the Board of Directors.
7. Accompany work visits/official trips (online) of the Board of Commissioners to work units within the Company at meetings with regulators or bank supervisors related to the duties and obligations of the Board of Commissioners.

Remuneration of the Secretary to the Board of Commissioners [ACGS C.3.4]

In order to ensure the professional execution of secretarial functions in alignment with the principles of good corporate governance, the remuneration of the Secretary of the Board of Commissioners is determined by the Board of Commissioners, taking into account the Bank's financial capacity. As stipulated in the Regulation of the Minister of State Owned Enterprises No. PER-3/MBU/03/2023 on the Organs and Human Resources of State Owned Enterprises, the honorarium received by the Secretary of the Board of Commissioners of BNI is capped at a maximum of 15% (Fifteen percent) of the President Director's salary, a transportation allowance of 20% (Twenty percent) of the monthly honorarium, and a religious holiday allowance paid once a year in an amount equal to one time the monthly honorarium.

Committees under the Board of Directors

In carrying out its duties, the Board of Directors is supported by the Corporate Secretary and Committees that provide input and recommendations related to policies and strategic directions. BNI has 10 (ten) committees under the Board of Directors, including:

1. Credit Committee
2. Integrated Risk Management Committee
3. Asset & Liability Committee (ALCO)
4. Risk Management & Anti-Fraud Committee
5. Business Committee
6. Performance Management Committee
7. Technology Management Committee
8. Credit Policy Committee
9. Human Capital (HR) Committee
10. Subsidiary Committee

CREDIT COMMITTEE

BNI has established Credit Committees comprising from the Head Office, Division, and Regional levels. These committees are designed to support the Board of Directors in decision-making related to lending activities, including the origination, augmentation, reduction, or extension of credit facilities within stipulated authority limits. In discharging their duties, the Credit Committees are authorized to determine or modify credit structures and ensure that the entire lending process is conducted prudently and objectively, maintaining a strategic balance between business interests and risk management.

The Credit Committees operate based on the 'four-eyes principle' to ensure a robust system of checks and balances between business and risk functions. This principle is implemented to guarantee an objective decision-making process, free from conflicts of interest, and to prevent any single-party dominance. In every decision, the Credit Committees adhere to BNI's prevailing credit policies and procedures, taking into account the debtor's condition, credit security levels, and the application of GCG principles. Beyond approving or rejecting credit applications, these committees assess risks, set exposure limits, and periodically monitor portfolio quality. Through these roles, the Credit Committees contribute to maintaining asset quality and mitigating credit risk to support the stability and sustainability of the Bank's financial performance.

CREDIT COMMITTEE CHARTER

In discharging its duties and responsibilities, the Credit Committee adheres to the Credit Guidelines, which govern authority regarding credit decisions, committee responsibilities, work procedures, and meeting mechanisms. The core provisions set forth in the BNI Credit Committee Charter are as follows:

1. Approving or rejecting credit proposals in accordance with the authority limits or credit types established by the Board of Directors;
2. Assuming accountability for credit decisions based on factors including business feasibility, credit security considerations, and compliance with credit policies, procedures, and limit provisions;
3. Coordinating with relevant divisions regarding credit funding aspects;
4. Rejecting requests and/or influence from parties interested in the credit applicant that would render the credit approval a mere formality;
5. Executing its duties, particularly regarding credit approvals within its authority, with professional proficiency, integrity, objectivity, prudence, and due diligence.

CREDIT COMMITTEE STRUCTURE AND MEMBERSHIP

The Credit Committee is tasked with making credit decisions and comprises officials from both business and risk functions. It operates based on the 'four-eyes principle' to guarantee objectivity and prevent conflicts of interest. The Credit Committee's structure spans three levels: Head Office, Division, and Regional Credit Committees. Throughout the decision-making process, the Credit Committee consistently considers the debtor's condition, credit security levels, credit policies and procedures, and the implementation of GCG principles.

PERIOD AND TENURE OF CREDIT COMMITTEE

The tenure of Credit Committee members is established in alignment with the respective structural term of office for each official at BNI.

CREDIT COMMITTEE MEMBERS PROFILE

More detailed information regarding the profiles of each Credit Committee member is extensively described in the Company Profile Chapter, under the Board of Directors Profile Sub-Chapter, Senior Executive Vice President (SEVP) Profile Sub-Chapter, and Executive Officers Sub-Chapter.

CREDIT COMMITTEE MEMBER CERTIFICATION

Each member of the Credit Committee is required to possess proven competencies verified through certification programs in accordance with prevailing regulations. In 2025, Members of the Credit Committee are certified in accordance with applicable regulations.

CREDIT COMMITTEE INDEPENDENCE STATEMENT

All members of the Credit Committee declare their commitment, capability, and willingness to discharge their duties and responsibilities independently, objectively, and in compliance with prevailing laws and GCG principles. This commitment is formalized in an Integrity Pact, which is signed and periodically updated by all members of the Credit Committee.

CREDIT COMMITTEE MEETINGS

Meeting Policy

The policy for convening Credit Committee meetings is regulated under the BNI Corporate Credit Guidelines, which encompass provisions regarding Credit Decision-Making Authority and committee meeting procedures.

Frequency and Attendance

Throughout 2025, the Credit Committee convened a series of meetings attended by the Board of Directors, totaling 865 Credit Committee sessions, with the following breakdown: 469 sessions for the Corporate Segment (including International and Institutional Banking), 278 sessions for the Enterprise Segment, 117 sessions for the Commercial Segment, and 1 session for the SME Business Segment.

CREDIT COMMITTEE TRAINING AND/OR COMPETENCY IMPROVEMENT IN 2025

Throughout 2025, the Chair and members of the Credit Committee participated in various training programs, seminars, and workshops to maintain and enhance their expertise and competencies in supporting the effective performance of their duties. Information in this regard has been presented in the Company Profile Chapter, under the subsection on the Competency Development Policy in the discussion titled Competency Development Based on Position Level and Gender Equality in 2025, as well as in the Corporate Governance Chapter, under the Board of Directors subsection in the discussion titled Training and/or Competency Improvement.

INTEGRATED RISK MANAGEMENT COMMITTEE (KMRT)

BNI as the Parent Company of a Financial Conglomeration, has established its vision to become a financial institution distinguished by excellence in service and sustainable performance. This vision is attainable, in part, through the implementation of integrated risk and capital management, managed in a prudent, effective, and efficient manner. In line with this objective, a mechanism for integrated risk and capital management is required, including the governing arrangements for the relevant executive committees.

The Integrated Risk Management Committee (KMRT) is one of BNI's permanent committees, which serves as a forum for discussing policies/ strategies for integrated risk management and risk appetite, as well as capitalization for the Financial Conglomerate. The Integrated Risk Management Committee (KMRT) of BNI was established pursuant to the Board of Directors' Decree No. KP/453/DIR/R dated September 10, 2025.

INTEGRATED RISK MANAGEMENT COMMITTEE CHARTER

To ensure that the members of BNI's Integrated Risk Management Committee (KMRT) discharge their duties and responsibilities in compliance with prevailing regulations, the Company has established the Integrated Risk Management Committee Charter as an official working guideline. This Charter is periodically reviewed, refined, and updated in alignment with recent developments and changes in applicable laws and regulations.

The most recent amendment to the Integrated Risk Management Committee Charter was enacted by the Board of Directors through Decree No. KP/453/DIR/R, dated September 10, 2025.

DUTIES AND RESPONSIBILITIES OF INTEGRATED RISK MANAGEMENT COMMITTEE

BNI's KMRT is tasked with and responsible for providing recommendations to the Board of Directors of the Parent Entity (i.e., PIKK) in order to:

1. The formulation, improvement, or refinement of Integrated Risk and Capital Management policies based on implementation evaluation results;
2. Establishing methodologies and procedures used to identify, measure, monitor, and control risks arising from all activities of the BNI Financial Conglomeration;
3. Providing recommendations regarding the determination of methodologies and assessments of the integrated risk profile and Minimum Capital Requirement (KPMM) for the BNI Financial Conglomeration.

INTEGRATED RISK MANAGEMENT COMMITTEE STRUCTURE AND MEMBERSHIP

BNI's KMRT consists of members of the Board of Directors, along with Executive Officers at one level below the Board who have been appointed. The structure of KMRT's membership is determined by a Board of Directors Decree, which also serves as the official assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The most recent amendment to the Integrated Risk Management Committee Charter was enacted by the Board of Directors through Decree No. KP/453/DIR/R, dated September 10, 2025.

Position on the Committee	Filled In by	Voting Rights Status
Chairman	Risk Management Director	Holds voting rights
Secretary	Head of Enterprise Risk Management Division (concurrently serving as a permanent member)	Holds no voting rights
Permanent Members at Director & SEVP Level	1. Finance & Strategy Director 2. Treasury & International Banking Director 3. BNI Director supervising Subsidiaries*) 4. Director/Management supervising the Risk Management function – Subsidiaries/Financial Services Institutions included in the Financial Conglomeration**)	Holds voting rights
Permanent Members at Director Level	Human Capital & Compliance Director***)	Holds no voting rights
Permanent Members at Division/Unit/ Functional Level	1. Operational Risk Management Division Head – BNI 2. Compliance Division Head – BNI 3. Head of Internal Audit Unit – BNI 4. Subsidiaries Management Division Head – BNI 5. Legal Division Head – BNI 6. Head of Anti Fraud – BNI 7. Corporate Planning & Performance Management Division Head – BNI 8. Treasury Division Head – BNI 9. Human Capital Strategy Division Head – BNI 10. CISO Division Head – BNI 11. IT Strategy & Architecture – BNI 12. Corporate Secretary Division Head – BNI 13. Pension Fund Division Head – BNI 14. AML-CFT Division Head – BNI 15. Pemimpin Divisi/setara yang menyelia fungsi Manajemen Risiko – Perusahaan Anak	Holds no voting rights
Non-Permanent Members	Directorate Directors/SEVPs/Management/Subsidiary Directors/Heads of Divisions/Units/Functional Units related to the meeting agenda, from both BNI and Subsidiaries/Financial Services Institutions included in the Financial Conglomeration.	As stipulated in the committee working guidelines

*) The number of BNI Directors supervising Subsidiaries refers to the prevailing Composition of Directors Supervising Subsidiaries.
**) The number of Subsidiary Directors/Management refers to the List of Financial Institutions included in the BNI Financial Conglomeration.
***) Specifically, the Human Capital & Compliance Director has specific duties and responsibilities stipulated in the Committee Working Guidelines.

PERIOD AND TENURE OF INTEGRATED RISK MANAGEMENT COMMITTEE

The term of office of KMRT membership is determined following each structural term of office at BNI.

PROFILE OF CHAIRMAN AND MEMBERS OF INTEGRATED RISK MANAGEMENT COMMITTEE

More detailed information on the profiles of BNI KMRT committees and members has been fully described in the Company Profile Chapter, Board of Directors Profile Sub-chapter, Senior Executive Vice President (SEVP) Profile Sub-chapter and Executive Officers Sub-chapter.

CERTIFICATION OF INTEGRATED RISK MANAGEMENT COMMITTEE

All members of BNI's KMRT Committee possess relevant certifications to support the competency requirements necessary for discharging their duties and responsibilities. These certifications serve as a fulfillment of the mandatory professional expertise standard.

STATEMENT OF INDEPENDENCE OF INTEGRATED RISK MANAGEMENT COMMITTEE

All members of the Integrated Risk Management Committee have carried out their duties and responsibilities independently. Statement of Independence of the Integrated Risk Management Committee has been disclosed in the Integrity Pact which is regularly updated and signed by all committee personnel.

INTEGRATED RISK MANAGEMENT COMMITTEE MEETING

Implementation of the Integrated Risk Management Committee Meeting

In accordance with the provisions stipulated in the Integrated Risk Management Committee Charter, the policies and procedures for the implementation of BNI KMRT meetings are as follows:

1. The Committee convenes meetings at least 2 (two) times in 1 (one) year or in accordance with exigencies, at a determined venue, time, and date, thereby enabling all members to schedule their attendance.
2. The committee may hold an emergency meeting considering the importance of the issue that requires immediate decision.
3. The Committee Quorum accounts for the Chairperson and Permanent Members (voting members) at the designated Board of Directors and SEVP level. A meeting quorum is achieved if attended by more than 1/2 (one-half) of the Committee quorum and must be attended by the Committee Chairperson.
4. In terms of decision-making, only all voting members consisting of Permanent Members and Non-Permanent Members of the Committee at the Director & SEVP level shall be present at the meeting and have voting rights.

Frequency and Attendance Rate

In 2025, BNI held 2 (two) KMRT meetings attended by the Board of Directors and committee members. More detailed information on the implementation of KMRT meetings and the attendance rate of committee members in these meetings is described in the following table:

No.	Date of Meeting	Meeting Agenda	Attendance Quorum (%)
1	January 24, 2025	a. Results of the Integrated Risk Profile Self-Assessment as of December 31, 2024 b. Integrated Minimum Capital Requirement as of December 31, 2024	87.5% (Fulfilled)
2	August 1, 2025	a. Results of the Integrated Risk Profile Self-Assessment as of June 30, 2025 b. Integrated Minimum Capital Requirement (KPMM) as of June 30, 2025 c. Results of the 2025 Integrated Risk Appetite Statement Review	87.5% (Fulfilled)

TRAINING AND/OR COMPETENCY IMPROVEMENT OF INTEGRATED RISK MANAGEMENT COMMITTEE IN 2025

Throughout 2025, BNI's Integrated Risk Management Committee (IRMC) participated in various training programs, seminars, and workshops to maintain professionalism while enhancing analytical capabilities in managing integrated risks. This reflects BNI's commitment to building human resource capacity at the strategic level.

Related information is described in the Company Profile chapter, Competency Development Policy subchapter in the discussion titled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance chapter, Board of Directors subchapter, in the discussion titled Training and/or Competency Improvement for the Boards of Directors Members in 2025.

IMPLEMENTATION OF INTEGRATED RISK MANAGEMENT COMMITTEE DUTIES IN 2025

Sepanjang tahun 2025, KMRT telah melaksanakan tugas sesuai dengan tanggung jawab yang ditetapkan sebagai berikut:

a. Komite telah menyusun dan menetapkan Kebijakan Umum Manajemen Risiko Terintegrasi secara tepat waktu dan selaras dengan ketentuan regulator.
b. Komite secara konsisten melakukan evaluasi dan penyempurnaan kebijakan berdasarkan hasil pemantauan implementasi, guna memastikan efektivitas dan relevansi pengelolaan risiko secara terintegrasi.
c. Komite telah menetapkan metodologi serta melaksanakan penilaian Profil Risiko Terintegrasi dan Kewajiban Penyediaan Modal Minimum (KPMM) Terintegrasi secara komprehensif untuk mendukung pengambilan keputusan strategis secara konglomerasi.

INTEGRATED RISK MANAGEMENT COMMITTEE WORK PLAN FOR 2026

The Integrated Risk Management Committee (KMRT) has established its work plan for 2026 with the following strategic priorities:

1. Integrated Risk Management Committee 01-2026 (Q1/2026)
   a. Approval of Integrated Risk Profile Self-Assessment Results as of December 31, 2025;
   b. Approval of Integrated Risk Profile Self-Assessment Results as of December 31, 2025.

2. Integrated Risk Management Committee 02-2026 (Q3/2026)
   a. Approval of Integrated Risk Profile Self-Assessment Result as of June 30, 2026;
   b. Approval of the Calculation Result of the Integrated Capital Adequacy Requirement (CAR) as of June 30, 2026;
   c. Approval of the Integrated Risk Appetite Review Year 2026.

ASSET & LIABILITY COMMITTEE (ALCO)

The Asset & Liability Committee (ALCO) is one of BNI's strategic committees that supports the Board of Directors in managing the balance sheet structure, liquidity, as well as market and interest rate risks. ALCO plays a critical role in ensuring an appropriate balance between the Bank's assets and liabilities in line with profitability objectives and the Bank's defined risk appetite.

ALCO is responsible for formulating funding strategies, managing liquidity, determining product pricing policies, and monitoring developments in financial markets that may affect BNI's financial position. In addition, ALCO evaluates cash flow projections, controls interest rate and foreign exchange risks, and optimizes the efficient use of capital.

ALCO regularly convenes meetings to discuss current financial conditions, market trends, and stress testing scenarios to ensure BNI's readiness in addressing economic dynamics. Through its roles and functions, ALCO serves as an essential instrument in maintaining financial stability, strengthening risk management, and supporting sustainable business growth.

ALCO CHARTER

The ALCO Committee operates under a work guideline outlined in the Asset & Liability Management Committee (ALCO) Charter, which was ratified by the Board of Directors through Decree No. KP/455/DIR/R dated September 10, 2025. This charter is periodically reviewed and updated to align with evolving regulatory requirements and legal changes.

DUTIES AND RESPONSIBILITIES OF THE ALCO

The Asset & Liability Committee (ALCO) has the following duties and responsibilities:

a. Determine the objectives and targets of BNI's Asset & Liability Management (ALMA) and to formulate the necessary policies and strategies.
b. Provide guidance on the management of BNI's assets and liabilities.
c. Determine and maintain an adequate level of liquid instruments in accordance with liquidity requirements and regulatory provisions.
d. Maintain a balanced structure between the use of funds and sources of funds.
e. Establish policies for fund placements, including Primary Reserve, Secondary Reserve, Tertiary Reserve, and Loans.
f. Analyze the balance sheet structure and assess all risks arising from BNI's exposures, including interest rate risk, foreign exchange risk, and liquidity risk.
g. Analyze the development and outlook of economic indicators and their impact on deposit and loan positions, foreign exchange positions, interest rates, exchange rates, and BNI's profitability.

h. To determine lending interest rates (base rates) and deposit interest rates for demand deposits, savings, and time deposits.

ASSET & LIABILITY COMMITTEE STRUCTURE AND MEMBERSHIP

BNI's ALCO consists of members of the Board of Directors, along with appointed Executive Officers at one level below the Board. The structure of ALCO's membership is determined by a Board of Directors Decree, which also serves as the official assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The composition of BNI ALCO Committee as of December 31, 2025, based on Decree No. KP/455/ DIR/R dated September 10, 2025 regarding Asset & Liability Committee Arrangement (ALCO), is as follows:

Position on the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Treasury Division Head (concurrently serving as a permanent member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Treasury & International Banking Director 2. Corporate Banking Director 3. Institutional Director 4. Commercial Banking Director 5. Consumer Banking Director 6. Network & Retail Funding Director 7. Finance & Strategy Director 8. Risk Management Director 9. SEVP Treasury	Holds voting rights
Permanent Members at the Director Level	Human Capital & Compliance Director*	Holds no voting rights
Permanent Members at the Division/Unit Level	1. International & Financial Institutions Division Head 2. Corporate Banking 1 Division Head 3. Corporate Banking 2 Division Head 4. Corporate Banking 3 Division Head 5. Corporate Banking 4 Division Head 6. Syndication & Structured Finance Division 7. Institutional Banking 1 Division Head 8. Institutional Banking 2 Division Head 9. Enterprise Banking 1 Division Head 10. Enterprise Banking 2 Division Head 11. Commercial Banking 1 Division Head 12. Commercial Banking 2 Division Head 13. SME Business Division Head 14. Business Program Division Head 15. Wholesale Transaction Product & Value Chain Division Head 16. Wholesale Transaction Digital Channel Division Head 17. Retail Digital Product & Partnership Division Head 18. Retail Digital Channel Division Head 19. Consumer Product Division Head 20. Consumer Segment Division Head 21. Wealth Management Division Head 22. Corporate Credit Risk Division Head 23. Enterprise Credit Risk Division Head 24. Commercial Credit Risk Division Head 25. Retail Credit Risk Division Head 26. Retail Collection & Recovery Division Head 27. Corporate Remedial & Recovery Division Head 28. Enterprise & Commercial Remedial & Recovery Division Head 29. Network Strategy & Development Division Head 30. Subsidiaries Management Division Head 31. Head of Office of the Chief Economist Division 32. Corporate Planning & Performance Management Division Head 33. Accounting Division Head 34. Policy Governance Division Head 35. Enterprise Risk Management Division Head 36. Compliance Division Head 37. Internal Audit Unit 38. Card Business Division Head 39. Agen46 Division Head	Holds no voting rights
Non-permanent Members	Directors / SEVPs / Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the Committee's Work Guidelines

*) Specifically, Human Capital & Compliance Director has special duties and responsibilities as stipulated in the committee's work guidelines.

TERM AND TENURE OF ALCO COMMITTEE

The tenure of ALCO Committee membership is determined in accordance with the respective structural terms of office at BNI.

PROFILE OF THE CHAIR AND MEMBERS OF THE ALCO

Detailed information regarding the profile of the ALCO Committee and its members is comprehensively outlined in the Company Profile chapter, specifically in the sub-chapters on the Profile of the Board of Directors, the Profile of Senior Executive Vice Presidents (SEVP), and the Profile of Executive Officers.

ASSET & LIABILITY COMMITTEE CERTIFICATION

BNI ensures that all members of the ALCO Committee meet the required qualification standards and competency certifications in accordance with applicable regulations. In 2025, the ALCO Committee successfully completed the designated certification program.

ALCO INDEPENDENCE STATEMENT

All members of BNI's ALCO are assured to meet the independence criteria and individual requirements as professionals in carrying out their duties and responsibilities objectively and independently, free from any conflicts of interest with the Bank. The ALCO Independence Statement is disclosed in the Integrity Pact, which is periodically updated and signed by all ALCO personnel.

ASSET & LIABILITY COMMITTEE MEETING

Implementation of the Asset & Liability Committee Meeting

As stipulated in the Asset & Liability Management Committee (ALCO) Charter, the policies and procedures for conducting BNI ALCO Committee meetings are as follows:

1. The Committee meets at least once every 3 months (quarterly) or as required at a certain place, time and date that has been determined so that all members can arrange time for attendance.
2. The Committee may schedule meetings outside of the items mentioned in point 1 above, as follows:
   a. Schedule an emergency meeting, considering the importance of issues requiring immediate decisions.
   b. Hold a limited meeting with the relevant Division/Unit/Functional Unit to formulate operational policies aligned with the Committee's established policies.
   c. Conduct a Mini ALCO attended by at least three Directors: Treasury & International Banking Director, Risk Management Director, and Finance & Strategy Director.
3. The Committee quorum takes into account the Chair, Vice Chair, and permanent voting members at the Director and SEVP (Senior Executive Vice President) levels. A Committee meeting quorum is met if attended by more than half of the Committee quorum, and the Chair and/or Vice Chair must be present.
4. In terms of decision-making, only all voting members consisting of Permanent Members and Non-Permanent Members of the Committee at the Director & SEVP level shall be present at the meeting and have voting rights.

Frequency and Attendance

In 2025, BNI held 14 ALCO Committee meetings which were attended by the Board of Directors and committee members. More detailed information on the implementation of ALCO Committee Meetings and the attendance rate of committee members in the meetings is described in the following table:

No.	Date Meeting	Agenda	Attendance Quorum
1	January 13, 2025	Review of ALCO 2024 Decisions and Determination of DPK and Credit Programs for 2025	100% (Fulfilled)
2	March 10, 2025	Review of Foreign Currency Credit Disbursement Plans through December 2025 and Credit Repricing	100% (Fulfilled)
3	April 9, 2025	Action Plan from Stress Test Results in Anticipation of Recession and Stagflation Conditions Following US Tariff Policy	100% (Fulfilled)
4	May 5, 2025	Review of Medium Segment Credit Acceleration Program	100% (Fulfilled)
5	June 4, 2025	Changes in Authority to Decide on Special Rate DPK	100% (Fulfilled)
6	August 11, 2025	Review of Current Account and Savings Counter Rates	100% (Fulfilled)
7	August 28, 2025	Q4-2025 Credit Acceleration Quota	100% (Fulfilled)
8	September 15, 2025	Discussion of the Distribution of the Ministry of Finance's Budget Surplus (SAL) Funds	100% (Fulfilled)

No.	Date Meeting	Agenda	Attendance Quorum
9	September 19, 2025	Review of Rupiah Deposit Counter Rates	100% (Fulfilled)
10	September 23, 2025	Review of USD Deposit Counter Rates	100% (Fulfilled)
11	September 29, 2025	Evaluation of Financial Market Conditions on DPK Interest Rate Policy	92% (Fulfilled)
12	October 27, 2025	Review of Q4-2025 Credit Acceleration Quota	92% (Fulfilled)
13	November 17, 2025	Credit and DPK Expansion Plan until December 2025 and Non-Conventional Funding (FNK) Principle Permit for 2026	83% (Fulfilled)
14	December 17, 2025	Monitoring of Credit and DPK Expansion until December 2025 and Credit and DPK Acceleration Program Decisions for 2026	100% (Fulfilled)

IMPLEMENTATION OF ASSET & LIABILITY COMMITTEE DUTIES IN 2025

Throughout 2025, the ALCO Committee has effectively carried out its management duties and work programs in accordance with its assigned responsibilities.

TRAINING AND/OR COMPETENCY IMPROVEMENT OF ASSET & LIABILITY COMMITTEE IN 2025

By 2025, the chair and members of the ALCO Committee participated in a number of training activities/seminars/workshops in order to maintain their level of expertise and competence to support the performance of their duties.

WORK PLAN OF THE ALCO COMMITTEE FOR 2025

The ALCO has established its work plan for 2026 with the following strategic priorities:

1. Growth strategies for Third-Party Funds (DPK) and Credit, in line with the Bank's Business Plan for 2025.;
2. Pricing strategies for DPK and Credit;
3. Liquidity management strategy and non-DPK funding requirements.

RISK MANAGEMENT & ANTI-FRAUD COMMITTEE (KRA)

The Risk Management & Anti-Fraud Committee (KRA) is a permanent committee under the Board of Directors, authorized to provide recommendations regarding the formulation, establishment, and management of risk policies. These encompass Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputational Risk, Strategic Risk, and Compliance Risk; Establishment of anti-fraud policies and management strategies across all organizational units; establishment of BNI's Environmental, Social & Governance (ESG) policies and management; and conducting credit risk portfolio assessments. The Risk Management & Anti-Fraud Committee (KRA) was established through Board of Directors Decree No. KP/454/DIR/R, consisting of 4 subcommittees, namely the Risk Management Sub-committee (RMC), Anti-Fraud Sub-committee (KAF), Environmental, Social & Governance Sub-committee (ESG), and Credit Risk Portfolio Subcommittee (CRO).

CHARTER OF THE RISK MANAGEMENT & ANTIFRAUD COMMITTEE (KRA)

In carrying out its roles and responsibilities, the Risk Management & Anti-Fraud Committee (KRA) adheres to the Risk Management & Anti-Fraud Committee (KRA) Work Guidelines, which regulate the scope, duties, authorities, and working procedures of the Risk Management & Anti-Fraud Committee (KRA).

The Risk Management & Anti-Fraud Committee (KRA) Work Guidelines are continuously evaluated and reviewed on a regular basis to maintain their relevance to industry dynamics and the Bank's needs. The latest update to these guidelines was made by the Board of Directors through Board of Directors Decree No. KP/454/DIR/R dated September 10, 2025 concerning the Structuring of Risk Management & Anti-Fraud (KRA).

DUTIES AND RESPONSIBILITIES OF THE RISK MANAGEMENT SUB-COMMITTEE (RMC)

1. Risk Management Sub-Committee (RMC)
   In executing its functions, the members of the RMC Sub-Committee are tasked with evaluating and providing recommendations regarding risk management, which at a minimum includes:
   a. Formulating Risk Management Policies and Strategies and any changes thereto;
   b. Developing a Risk Management framework and contingency plans to anticipate abnormal conditions;
   c. Periodically or incidentally improving the Risk Management process due to changes in the Bank's external and internal conditions that affect Capital Adequacy, Risk Profile, and ineffective Risk Management implementation based on evaluation results;

d. Establishing policies and/or business decisions that deviate from normal procedures, such as exceeding significant business expansion compared to the previously set Business Plan or taking positions/exposures that exceed established limits; and
e. Establishing policies for managing capital adequacy to mitigate risks and support the Bank's business strategy, including measurement, structure (tier 1/tier 2), allocation, and capital contingency plans.

2. Duties and Responsibilities of the Anti-Fraud Sub-Committee
The Anti-Fraud Subcommittee has the following main duties:
a. Formulating Anti-Fraud Policies and Strategies and their amendments;
b. Developing a culture and awareness of anti-fraud throughout the organization;
c. Monitoring the implementation of Anti-Fraud Policies and Strategies at BNI and periodically reviewing the impact of the policies and strategies implemented;
d. Identify, evaluate, and determine follow-up actions for fraud incidents originating from activities in all BNI work units.

3. Environmental, Social, & Governance (ESG) Sub-Committee
The ESG Sub-Committee is tasked with the following responsibilities:
a. Formulating Environmental, Social, and Governance (ESG) management policies and strategies, including any amendments thereto;
b. Identifying potential ESG risks that may have an impact on BNI and its stakeholders;
c. Monitoring the implementation of the Sustainable Finance strategy;
d. Monitoring, evaluating, and providing recommendations on the results of BNI's ESG assessments;
e. Evaluating the implementation of ESG strategies across all of BNI's business lines;
f. Coordinating among units to formulate objectives and implementation guidelines for the Corporate Social and Environmental Responsibility (TJSL) Program;
g. Mapping and developing BNI's TJSL Program; and
h. Conducting evaluations of the implementation of BNI's TJSL Program.

4. Credit Risk Portfolio (CRO) Sub-Committee
The CRO Sub-Committee has a number of duties and responsibilities, including the following:
a. Discussing the credit risk assessment as the basis for determining the adequacy of provisioning.
b. Discussing related matters the development of the condition and quality of the credit portfolio.
c. Determine strategies, mitigation and follow-up on credit risk management that may affect the Bank's soundness.

STRUCTURE AND MEMBERSHIP OF RISK MANAGEMENT & ANTI-FRAUD COMMITTEE

The structure, membership, and voting status of KRA as of December 31, 2025, based on the Decree of the Board of Directors No. KP/454/DIR/R dated September 10, 2025 regarding the Arrangement of the Risk Management and Anti-Fraud Committee (KRA), are as follows:

1. Risk Management Sub-Committee (RMC)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Vice President Director	Holds voting rights
Vice Chairman	Director of Risk Management	Holds voting rights
Secretary	Head of Enterprise Risk Management Division (concurrently serving as a permanent non-voting member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Finance & Strategy Director 2. Corporate Banking Director 3. Institutional Director 4. Treasury & International Banking Director 5. Commercial Banking Director 6. Consumer Banking Director 7. Network & Retail Funding Director 8. Information Technology Director 9. Operations Director	Holds voting rights

Position in the Committee	Filled In by	Voting Rights Status
Permanent Members at the Director Level	Human Capital & Compliance Director*)	Holds no voting rights
Permanent Members at the Division/Unit Level/ Functional Unit	1. Operational Risk Management Division Head 2. Corporate Credit Risk Division Head 3. Enterprise Credit Risk Division Head 4. Commercial Credit Risk Division Head 5. Retail Credit Risk Division Head 6. Anti-Fraud Unit 7. Corporate Planning & Performance Management Division Head 8. Accounting Division Head 9. Subsidiaries Management Division Head 10. Corporate Development & Transformation Division Head 11. Wholesale Transaction Product & Value Chain Division Head 12. Treasury Division Head 13. Office of the Chief Economist Division Head 14. Credit Operations Division Head 15. Distribution Network & Sales Division Head 16. Internal Audit Unit 17. Corporate Secretary Division Head 18. Compliance Division Head 19. Legal Division Head 20. Policy Governance Division Head 21. SORX Wholesale Banking 22. SORX Consumer Banking & Corporate Function 23. SORX Network & Retail 24. SORX Technology & Operations	Holds no voting rights
Non-permanent Members	Directors / SEVPs / Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the committee's working guidelines

*) Specifically, the Director of Human Capital & Compliance has special duties and responsibilities as stipulated in the committee's work guidelines.

2. Anti-Fraud Sub-Committee (KAF)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Director of Risk Management	Holds voting rights
Vice Chairman	Director of Information Technology	Holds voting rights
Secretary	Head of Anti-Fraud Unit / Operational Risk Management Division Head (concurrently serving as a permanent member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Network & Retail Funding Director 2. Consumer Banking Director 3. Operations Director 4. Senior Executive Vice President (SEVP) of Legal & Governance 5. Senior Executive Vice President (SEVP) of Information Technology	Holds voting rights
Permanent Members at the Director Level	Human Capital & Compliance Director*)	Holds no voting rights
Permanent Members at the Division/Unit Level/ Functional Unit	1. Enterprise Risk Management Division Head 2. Chief Information Security Officer (CISO) Division Head 3. Distribution Network & Sales Division Head 4. Consumer Product Division Head 5. Credit Operations Division Head 6. Head of Internal Audit Unit 7. Policy Governance Division Head 8. Compliance Division Head 9. Legal Division Head 10. Human Capital Strategy Division Head 11. Human Capital Services Division Head	Holds no voting rights
Non-permanent Members	Directors / SEVPs / Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the committee's working guidelines

*) Specifically, the Director of Human Capital & Compliance has special duties and responsibilities as stipulated in the committee's work guidelines.

3. Environment, Social and Governance (ESG) Sub-Committee

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Deputy President Director	Holds voting rights
Vice Chairman	Risk Management Director	Holds voting rights
Secretary	Environmental, Social & Governance (ESG) Division Head (concurrently serving as a permanent member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Finance & Strategy Director 2. Corporate Banking Director 3. Treasury & International Banking Director 4. Institutional Director 5. Commercial Banking 6. Consumer Banking Director 7. Network & Retail Funding Director 8. Operations Director 9. Information Technology Director	Holds voting rights
Permanent Members at the Director Level	Human Capital & Compliance Director*)	Holds no voting rights
Permanent Members at the Division/Unit Level	1. Enterprise Risk Management Division Head 2. Operational Risk Management Division Head 3. Corporate Credit Risk Division Head 4. Enterprise Credit Risk Division Head 5. Commercial Credit Risk Division Head 6. Corporate Planning & Performance Management Division Head 7. Investor Relations Division Head 8. Subsidiaries Management Division Head 9. Procurement & Fixed Assets Division Head 10. Corporate Banking 1 Division Head 11. Corporate Banking 2 Division Head 12. Corporate Banking 3 Division Head 13. Corporate Banking 4 Division Head 14. Syndication & Structured Finance Division Head 15. Enterprise Banking 1 Division Head 16. Enterprise Banking 2 Division Head 17. Commercial Banking 1 Division Head 18. Commercial Banking 2 Division Head 19. SME Business Division Head 20. Business Program Division Head 21. International & Financial Institutions Division Head 22. Treasury Division Head 23. Consumer Product Division Head 24. Card Business Division Head 25. Agen46 Division Head 26. Compliance Division Head 27. Policy Governance Division Head 28. Human Capital Strategy Division Head 29. Human Capital Services Division Head 30. BNI University Division Head 31. Corporate Secretary Division Head	Holds no voting rights
Non-permanent Members	Directors/SEVPs/Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the committee's working guidelines

*) Specifically, the Director of Human Capital & Compliance has special duties and responsibilities as stipulated in the committee's work guidelines.

4. Credit Risk Portfolio (CRO) Sub-Committee

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Director of Risk Management	Holds voting rights
Vice Chairman	Director of Finance & Strategy	Holds voting rights
Secretary	Head of Corporate Credit Risk Division (concurrently serving as a permanent non-voting member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Senior Executive Vice President (SEVP) Credit Risk 2. Senior Executive Vice President (SEVP) Remedial & Recovery	Holds voting rights
Permanent Members at the Division/Unit Level/ Functional Unit	1. Enterprise Risk Management Division Head 2. Commercial Credit Risk Division Head 3. Retail Credit Risk Division Head 4. Corporate Remedial & Recovery Division Head 5. Enterprise & Commercial Remedial & Recovery Division 6. Retail Collection & Recovery Division Head 7. Corporate Planning & Performance Management Division Head 8. Accounting Division Head 9. Treasury Division Head	Holds no voting rights
Non-permanent Members	Directors/SEVPs//Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the committee's working guidelines

RISK MANAGEMENT & ANTI FRAUD COMMITTEE TERM AND OFFICE

The term of office of the Risk Management & Anti Fraud Committee membership is determined following each structural term of office at BNI.

PROFILE OF THE CHAIRMAN AND MEMBERS OF THE RISK MANAGEMENT & ANTI FRAUD COMMITTEE

Detailed information on the profile of the committee and members of the BNI Risk Management & Anti Fraud Committee has been fully described in the Company Profile Chapter, Directors Profile Subchapter, Senior Executive Vice President (SEVP) Profile Sub-chapter and Executive Officers Subchapter.

RISK MANAGEMENT & ANTI-FRAUD COMMITTEE CERTIFICATION

BNI ensures that all Risk Management & Anti Fraud personnel have met the qualification standards and competency certification in accordance with applicable regulations. In 2025, Risk & Anti-Fraud Management has met the established certification program.

INDEPENDENCE STATEMENT OF RISK MANAGEMENT & ANTI-FRAUD COMMITTEE

BNI ensures that all KRA members have met the independence criteria and individual requirements as objective and independent parties in carrying out their duties and responsibilities objectively and free from any conflict of interest with the Bank. The Independence Statement of the chairman and members of KRA has been disclosed in the Integrity Pact which is regularly updated and signed by all committee personnel.

RISK MANAGEMENT & ANTI-FRAUD COMMITTEE MEETING

Implementation of the Risk Management & Anti Fraud Committee Meeting

1. Each Sub-Committee shall convene meetings at least four (4) times in one (1) year or as required, at a designated place, time, and date, so that all members may arrange their schedules to attend.
2. The Sub-committee may hold emergency meetings considering the importance of issues that require immediate decisions.
3. The quorum of theSub-committee consists of the Chair, Vice Chair, and permanent members at the level of Directors & SEVP as determined. The quorum of the Sub-committee is achieved if at least more than ½ (half) of the sub-committee quorum is present and must be attended by the Chair and/or Vice Chair.
4. In decision-making, only all voting members, consisting of Permanent and Non-Permanent Members at the Director and SEVP levels, shall be present at the meeting and shall have voting rights.

Frequency and Attendance Rate

1. Risk Management Sub-Committee (RMC)
   In 2025, BNI held 5 (five) RMC Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of RMC Sub-Committee meetings and the attendance rate of committee members in these meetings is described in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 10, 2025	KRA-RMC 01/2025 BNI Individual Risk Profile as of December 31, 2024	82% (Fulfilled)
2	March 10, 2025	KRA-RMC 02/2025 Discussion of the Results of the Review of BNI's Risk Appetite Statement (RAS) for 2025	91% (Fulfilled)
3	April 16, 2025	KRA-RMC 03/2025 BNI Individual Risk Profile as of March 31, 2025	91% (Fulfilled)
4	July 11, 2025	KRA-RMC 04/2025 BNI Individual Risk Profile as of June 30, 2025	91% (Fulfilled)
5	October 10, 2025	KRA-RMC 05/2025 BNI Individual Risk Profile as of September 30, 2025	82% (Fulfilled)

2. Anti Fraud Sub-Committee (KAF)

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 17, 2025	Significant changes in fraud reporting criteria	87.5% (Fulfilled)
2	September 19, 2025	1. Fraud trends from 2022 to August 2025 (frequency and nominal losses) 2. Trends in case disclosure 3. Improvements that have been and will be made to prevent fraud from recurring	62.5% (Fulfilled)
3	October 10, 2025	1. Improvements to API Management Security 2. Updating progress on the development of the FDS (Fraud Detection System)	87,5% (Fulfilled)
4	November 6, 2025	1. Request for approval of the Company's Anti-Fraud Strategy Policy Guidelines 2. Request for approval of the Company's SIPELAKU Procedure Guidelines 3. Request for approval of SIPELAKU for the employment process	75% (Fulfilled)

3. Environmental, Social & Governance (ESG) Sub-Committee
   In 2025, BNI held 4 (four) ESG Sub-Committee meetings attended by the Board of Directors and committee members. More detailed information on the implementation of the ESG Sub-Committee meetings and the attendance rate of committee members in the meetings is outlined in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	February 6, 2025	Approval of Sustainability Bond Framework Proposal	81.82% (Fulfilled)
2	March 24, 2025	a. Approval of Green Bond distribution proposal b. Update on SPO Review Results on Sustainability Bond Framework	100% (Fulfilled)
3	September 16, 2025	Approval of proposals on: a. Eligible Projects for Sustainability Bond Distribution in 2025. b. Proposed scope of targets & scenarios for achieving BNI's 2028 Operational NZE: Scope 1 & 2 Emissions with 2023 Emissions Baseline. c. Establishment of a carbon project task force.	83.33% (Fulfilled)
4	December 19, 2025	Potential Risks and Opportunities for BNI in Preparing for the Implementation of IFRS S1 & S2	83.33% (Fulfilled)

4. Sub-Komite Credit Risk Portfolio (CRO)

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	January 31, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee January 2025 (KRA-CRO 01/2025)	75% (Fulfilled)
2	February 26, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee February 2025 (KRA-CRO 02/2025)	75% (Fulfilled)
3	March 24, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee March 2025 (KRA-CRO 03/2025)	75% (Fulfilled)
4	April 30, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee April 2025 (KRA-CRO 04/2025)	75% (Fulfilled)
5	May 26, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee May 2025 (KRA-CRO 05/2025)	75% (Fulfilled)
6	June 25, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee June 2025 (KRA-CRO 06/2025)	75% (Fulfilled)
7	July 28, 2025	Risk Management & Anti-Fraud Committee Sub-Committee Credit Risk Portfolio July 2025 (KRA-CRO 07/2025)	75% (Fulfilled)
8	August 29, 2025	Risk Management & Anti-Fraud Committee Sub-Committee Credit Risk Portfolio August 2025 (KRA-CRO 08/2025)	100% (Fulfilled)
9	September 29, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee September 2025 (KRA-CRO 09/2025)	100% (Fulfilled)
10	October 29, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee October 2025 (KRA-CRO 10/2025)	100% (Fulfilled)
11	November 27, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee November 2025 (KRA-CRO 11/2025)	75% (Fulfilled)
12	December 29, 2025	Risk Management & Anti-Fraud Committee Credit Risk Portfolio Subcommittee December 2025 (KRA-CRO 12/2025)	75% (Fulfilled)

TRAINING AND COMPETENCY DEVELOPMENT FOR THE RISK MANAGEMENT & ANTI-FRAUD COMMITTEE (KRA) IN 2025

In 2025, the chairman and members of KRA participated in a number of training activities/ seminars/ workshops in order to maintain their level of expertise and competence to support the implementation of their daily duties. Information related to this has been described in the Company Profile Chapter, Competency Development Policy subchapter in the discussion entitled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance Chapter, Board of Directors subchapter, in the discussion entitled Training and/or Competency Improvement of the Board of Directors Members in 2025.

IMPLEMENTATION OF THE RISK MANAGEMENT & ANTI-FRAUD SUB-COMMITTEE'S TASKS IN 2025

1. Risk Management Sub-Committee (RMC)
   Throughout 2025, the RMC Sub-Committee has carried out its duties in accordance with its established responsibilities, namely as follows:
   a. Strengthening Risk Management Policies and Strategies;
   b. Strengthening the Risk Management framework and contingency plans to anticipate abnormal conditions;
   c. Improving the Risk Management process;
   d. Strengthening capital adequacy management policies to protect against risk and support the Bank's business strategy.

2. Anti Fraud Sub-Committee (AAF)
   In carrying out its management duties during 2025, the Anti Fraud Sub-Committee has realized the work program that was set at the beginning of the year, including the following:
   a. Strengthening of the Anti-Fraud Strategy policy;
   b. Strengthening of the fraud prevention pillar in the form of employee profile monitoring as part of the Know Your Employee program;

c. Changes to the criteria for reporting significant fraud;
d. Evaluation and follow-up on fraud incidents through the aspects of system, procedure, and people;
e. Strengthening of the detection pillar through the development of an FDS (Fraud Detection System).

3. Environmental, Social, & Governance (ESG) Sub-Committee
Throughout 2025, the ESG Sub-Committee has realized work programs, among others:
a. Supervision function on the implementation of ESG at BNI, including the achievement and improvement of BNI's MSCI ESG rating.
b. Implementation of Climate Risk Stress Test (CRST) for 50% of BNI's credit portfolio in accordance with OJK direction, along with the development of CRST tools.
c. Development of BNI Waste Management with the concept of zero waste to landfill;
d. Distribution of BNI Green Bond in accordance with BNI Green Bond framework and POJK No. 60/POJK.04/2017 concerning the Issuance and Requirements of Environmentally Friendly Debt Securities (Green Bonds);
e. Development of BNI's function as a debtor partner in the transition journey through the organization of BNI ESG Sustainability & Transition (BEST) Event and TKBI Technical Assistant Workshop for BNI debtors in the energy sector;
f. Implementation of the Indonesian Taxonomy of Sustainable Finance (TKBI) in the energy sector in accordance with OJK's directives.

4. Credit Risk Portfolio (CRO) Sub-Committee
In carrying out its management duties during 2025, the realization of the CRO Sub-Committee work program is as follows:
a. Followed up on developments in debtor conditions that affect the quality of the credit portfolio and the adequacy of monthly provisions;
b. Established strategies, mitigation measures, and follow-up actions for credit risk management that may affect the bank's health;
c. Re-modeled the calculation of provision adequacy, adjusting it to IFRS 9 and the nature of business in each segment;
d. Monitored the updating of internal debtor ratings as a form of periodic monitoring of debtor quality and performance.

RISK MANAGEMENT & ANTI-FRAUD SUBCOMMITTEE WORK PLAN 2026

1. Risk Management Sub-Committee (RMC)
The RMC Subcommittee has developed a work plan for 2026 with a primary focus on conducting a comprehensive evaluation of the effectiveness of risk management across all of the Bank's business lines. This plan includes monitoring the implementation of risk management policies and procedures, analyzing the risk profile, and reviewing the appropriateness of the established risk appetite and risk tolerance.

In addition, the RMC Subcommittee is committed to providing strategic recommendations to the Board of Directors to ensure that risk management runs optimally, supports the achievement of business objectives, and is in line with regulatory requirements and best practices in the banking industry. These efforts are expected to strengthen the Bank's resilience in facing external and internal dynamics, while improving the quality of risk governance on an ongoing basis.

2. Anti Fraud Sub-Committee (AAF)
The Anti Fraud Sub-Committee has prepared a work plan and program for 2026 in order to implement the 4 Pillars of Anti Fraud Strategy as stipulated in POJK No. 12 of 2024, especially strengthening the Prevention Pillar. Evaluation of the implementation of the work program is reported in the Anti Fraud Sub-Committee forum.

3. Environmental, Social, & Governance (ESG) Sub-Committee
The ESG Sub-Committee has established a work plan for 2026, as follows:

Related to Sustainability Products and Services
a. Increased Green Loan portfolio with a target increase of 5% - 10% per year.
b. Development of Sustainability Finance Framework.
c. Partnership with institutions to develop ESG programs.
d. Development of MSME program:
1) Eco-friendly MSMEs:
- BUMI program with target market of MSME players who use materials and produce environmentally friendly products.

- Jejak Kopi Khatulistiwa (JKK) program empowers coffee farmers through the use of Social Forest land.

2) MSMEs Go Global:
- Encouraging BUMI and JKK programs to enter the export market.
- Education and capability building program to support MSMEs to enter the export market with a target of 27,700 MSMEs.

e. Expansion of "Ayo Menabung dengan Sampah" Program to 640 schools.
f. Development of an Environmentally Friendly Credit Card program for the purchase of sustainable goods, in collaboration with WWF.
g. Gradual expansion of Agen46 in 3T areas, so that by 2028, 25,000 agents in 3T areas will be reached.
h. Digitalization of outlets for all BNI outlets.
i. Optimization of digital channels for SME transactions, Agen46, and Digital Banking customers.

Related to Sustainable Finance Management in Risk Management
a. Establish Debtor Transition Advisory framework and program for high emission sectors.
b. Alignment of portfolio management with transition plan in high emission sector.
c. Debtor Transition Program education for high emission sector.
d. Operational emissions platform to achieve Operational NZE.
e. Implementation of Climate Risk Stress Test for 100% of loan portfolio.
f. Implementation of Waste Management with the concept of Zero Waste to Land-fill (ZWTL) and circular economy in all BNI and Subsidiary Company offices.
g. Implementation of IFRS S1 & S2.
h. Adoption of PCAF methodology in the calculation of Financing Emissions.
i. Adoption of international best practice standards.
j. Development of Climate Risk Framework with TCFD principles.
k. Development of Decarbonization Roadmap and establishment of annual operational emission decarbonization targets with SBTi principles.
l. Planning and Implementation of Conservation Project (Carbon Project) for emission offset.
m. Determination of SDGs Focus and Refocusing CSR programs & targets according to SDGs Focus.

Related to Internal Capacity Development
a. ESG Refreshment program for employees.
b. ESG certification for ESG Management managers: ESG Investing, Climate Risk and GRI Standard.
c. Establishment of ESG Academy.
d. ESG Campaign through Green LifeStyle for employees and Establishment of ESG Ambassador.
e. ESG Campaign for Customers/Debtors through BNI ESG Sustainability & Transition (BEST) Event.
f. BNI participation in national and international ESG events.

4. Sub-Committee on Credit Risk Portfolio (CRO)
The Sub-Committee on CRO has established its work plan for 2026, focusing on enhancing the execution of the Credit Risk Portfolio SubCommittee. This initiative aims to improve credit risk assessment as the basis for determining the adequacy of provisioning, evaluating the quality of the credit portfolio, and formulating credit risk management strategies that may impact the Bank's financial health.

BUSINESS COMMITTEE (KBI)

The Business Committee (KBI) is a committee within BNI authorized to provide recommendations to the Board of Directors regarding product/activity management policies, marketing strategies, and business ecosystem execution.

The Business Committee was established through Board of Directors Decree No. KP/456/DIR/R. It consists of three subcommittees: the Product Subcommittee (PRC), the Ecosystem Subcommittee (ECO), and the Marketing Strategy Subcommittee (MKT).

BUSINESS COMMITTEE CHARTER

The Business Committee carries out its duties and responsibilities based on the Business Committee Charter, which was established by the Board of Directors through Decree No. KP/456/DIR/R dated September 10, 2025. This charter is periodically reviewed and updated to align with regulatory developments and changes in applicable laws.

DUTIES AND RESPONSIBILITIES OF THE BUSINESS COMMITTEE

1. Product Sub-Committee (PRC)
   The Product Sub-Committee (PRC) is responsible for the following tasks:
   a. Establishing business scale strategies and development plans through BNI's products and activities;
   b. Conducting a comprehensive assessment and determining the "feasibility" of new products or activities, particularly those involving cross-sectoral/segment alliances and strategic partnerships with subsidiaries or external companies, by inviting the relevant Sector Director;
   c. Monitoring the implementation of products/ activities at BNI and making decisions regarding their continuity based on recommendations from the Supporting Working Group/product owners;
   d. Acting as an arbitration body for crosssectoral issues related to the Performance Management System (PMS) in the implementation of new products or activities.

2. Ecosystem Sub-Committee (ECO)
   The ECO Sub-Committee is responsible for the following key tasks:
   a. Establishing execution strategies for the business ecosystem of selected customers/ debtors/prospective customers/prospective debtors along with their value chains;
   b. Defining and deciding on cross-selling strategies and programs, pricing optimization, and product package deals for the business ecosystem of selected customers/debtors/ prospective customers/prospective debtors, in accordance with prevailing authorities;
   c. Setting and monitoring strategic business collaboration strategies, including cooperation among Divisions/Units/ Functional Units/ Regional Offices/Sentra/ Branches and Subsidiaries; and
   d. Overseeing and evaluating the execution strategies for the business ecosystem of selected customers/debtors/prospective customers/prospective debtors along with their value chains.

3. Marketing Strategy Sub-Committee (MKT)
   The Marketing Strategy Sub-Committee (MKT) is responsible for the following key tasks:
   a. Establishing BNI's marketing and corporate branding strategies aligned with BNI's strategic business plans (i.e., Corporate Plan & RBB).
   b. Prioritizing marketing and corporate branding strategy initiatives that significantly impact BNI's business and operations, in line with BNI's planning and budgeting.
   c. Reviewing plans and monitoring the realization of BNI's marketing and corporate branding strategies.

STRUCTURE AND MEMBERSHIP OF THE BUSINESS COMMITTEE

The Business Committee consists of members of the Board of Directors, along with appointed Executive Officers at one level below the Board of Directors. The structure of the Business Committee's membership is determined based on a Board of Directors' Decree, which also serves as the formal assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The structure, membership, and voting rights status of the Business Committee as of December 31, 2025, are outlined in Board of Directors' Decree No. KP/456/DIR/R dated September 10, 2025, regarding the Issuance of the Board of Directors' Decree on the Structuring of the Business Committee (KBI), as follows:

1. Product Sub-Committee (PRC)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Finance & Strategy Director	Holds voting rights
Secretary	Corporate Planning & Performance Management Division Head (also Permanent Member)	Holds no voting rights
Permanent Member at the Director & SEVP level	1. Network & Retail Funding Director 2. Risk Management Director 3. Information Technology Director 4. Operations Director	Holds voting rights
Permanent Member at the Board of Directors level	Human Capital & Compliance Director*	Holds no voting rights

Position in the Committee	Filled In by	Voting Rights Status
Permanent Member at the Division/Unit/Functional Unit level	1. Policy Governance Division Head 2. Network Strategy & Development Division Head 3. Enterprise Risk Management Division Head 4. Operational Risk Management Division Head 5. Anti Fraud Unit Head 6. IT Strategy & Architecture Division Head 7. Banking OperationsDivision Head 8. Compliance Division Head 9. Legal Division Head 10. Customer Experience Center Division Head	Holds no voting rights
Non-permanent Member (Non-voting member)	Director of Division/SEVP/Division Head/Unit/Functional Unit related to the topic or product under discussion.	As stipulated in the committee working guidelines

*) Specifically, the Director of Human Capital & Compliance has special duties and responsibilities as stipulated in the committee's work guidelines.

2. Ecosystem Sub-Committee (ECO)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Deputy President Director	Holds voting rights
Vice Chairman	Corporate Banking Director/ Institutional Director (concurrently a permanent member)	Holds voting rights
Secretary	Wholesale Transaction Product & Value Chain Division Head (concurrently a permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level	1. Commercial Banking/SEVP Commercial & SME Director 2. Treasury & International Banking/SEVP Treasury Director 3. Consumer Banking Director 4. Network & Retail Funding/SEVP Network & Sales Director 5. SEVP Wholesale Solutions & Value Chain/SEVP Government Solution	Holds voting rights
Permanent Member at the Division/Unit/Functional Unit level	1. Corporate Banking Division Head * 2. Institutional Banking Division Head * 3. Enterprise Banking Division Head * 4. International & Financial Institutions Division Head * 5. SME Banking Division Head 6. Wealth Management Division Head 7. Consumer Segment Division Head 8. Network Strategy & Development Division Head 9. Treasury Division Head 10. Government Solution Head 11. Corporate Planning & Performance Management Division Head	Holds no voting rights
Non-permanent Member	Director of Division/SEVP/Division Head/Unit/Functional Unit/ Regional Office/Branch/Center/Subsidiary related to the topic under discussion.	As stipulated in the committee working guidelines

*) Adjusted to the topic of discussion

3. Marketing Strategy Sub-Committee (MKT)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	Consumer Banking Director	Holds voting rights
Vice Chairman	Finance & Strategy Director	Holds voting rights
Secretary	Marketing Communications Division Head (concurrently a permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level	1. Network & Retail Funding Director 2. Corporate Banking Director 3. SEVP Wholesale Solutions & Value Chain 4. SEVP Network & Sales	Holds voting rights

Position in the Committee	Filled In by	Voting Rights Status
Permanent Member at the Division/Unit/Functional Unit level	1. Corporate Banking Division Head * 2. Institutional Banking Division Head * 3. Enterprise Banking Division Head * 4. International & Financial Institutions Division Head * 5. Wealth Management Division Head 6. Consumer Segment Division Head 7. Consumer Product Division Head 8. Card Business Division Head 9. Retail Digital Product & Partnership Division Head 10. Retail Digital Channel Division Head 11. Wholesale Transaction Product & Value Chain Division Head 12. Wholesale Transaction Digital Channel Division Head 13. Network Strategy & Development Division Head 14. Corporate Planning & Performance Management Division Head 15. Corporate Secretary Division Head	Holds no voting rights
Non-permanent Member	Director of Division/SEVP/Division Head/Unit/Functional Unit/ Regional Office/Branch/Center/Subsidiary related to the topic of discussion.	As stipulated in the committee working guidelines

*) Adjusted to the topic of discussion

TERM AND TENURE OF THE BUSINESS COMMITTEE

The tenure of the Business Committee members is determined in alignment with their respective structural terms within BNI.

PROFILE OF THE CHAIRPERSON AND MEMBERS OF THE BUSINESS COMMITTEE

Information about the profiles of the members of the Business Committee is described in detail in the Company Profile Chapter, the Board of Directors Profile Subchapter, the Senior Executive Vice President (SEVP) Profile Subchapter, and the Executive Officers Subchapter.

BUSINESS COMMITTEE CERTIFICATION

BNI ensures that all personnel of the Business Committee meet the required qualifications and competency certifications in accordance with applicable regulations. In 2025, the Business Committee has participated in a certification program in accordance with applicable regulations.

STATEMENT OF INDEPENDENCE OF THE BUSINESS COMMITTEE

The Business Committee consistently upholds the principles of independence in exercising its duties, responsibilities, and authorities. All members of the Business Committee are committed to acting objectively, professionally, and free from any external influence. This independence is formally manifested through a statement of independence signed by each committee member.

BUSINESS COMMITTEE MEETINGS

Implementation of Business Committee Meeting

1. The Sub-Committees convene meetings at predetermined locations, times, and dates to allow all members to manage their attendance. The meeting frequency is as follows:
   a. The Product Sub-Committee holds meetings at least 2 (two) times a year and/or as needed.
   b. The Ecosystem Sub-Committee holds meetings at least 4 (four) times a year and/or as needed.
   c. The Marketing Strategy Sub-Committee holds meetings at least 2 (two) times a year and/or as needed.
2. The Sub-Committee may hold impromptu meetings to consider the importance of issues that require immediate decisions.
3. The Sub-Committee quorum consists of the Chairperson, Vice Chairperson, and permanent members at the Director & SEVP level. A Sub-Committee quorum is achieved if at least ½ (half) of the sub-committee quorum is present, and the Chairperson and/or Vice Chairperson must be present.
4. In decision-making, only all voting members, consisting of Permanent and Non-Permanent Members at the Board of Directors and SEVP levels, shall be present at the meeting and shall have voting rights.

Meeting Frequency and Attendance

1. Product Sub-Committee (PRC)

No.	Date	Meeting Agenda	Attendance Quorum (%)	Notes
1	March 21, 2025	Progress of the 2025 RPPB and Proposal of the RPPB for the March 2025 Period	80%	The Product Sub-Committee approved the RPPB agenda
2	June 10, 2025	Approval of the June 2025 RPPB	100%	Resolution: Approval of the Business Plan (RBB), including the RPPB
3	September 22, 2025	Approval of the proposed RPPB for the September 2025 period and update on wondr R5	100%	Resolution: The proposed RPPB for September 2025 was approved
4	October 22, 2025	Approval of the 2026 RPPB	100%	Resolution: Approval of the Business Plan (RBB) / Corporate Work Plan and Budget (RKAP), including the RPPB
5	November 17, 2025	wondr: Overview of ticketing services and development status	100%	Resolution: Discussion on wondr product

2. Ecosystem Sub-Committee (ECO)
   Due to the establishment of the Ecosystem Sub-Committee (ECO) at the end of 2025, there were no meetings held by this sub-committee during the current year.

3. Marketing Strategy Sub-Committee (MKT)
   Information regarding the MKT Sub-Committee meetings and member attendance rates is detailed in the following table:

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	February 19, 2025	wondr Rejeki BNI 2025	100% (Fulfilled)
2	February 19, 2025	SOGO Partnership	100% (Fulfilled))*
3	June 13, 2025	Proposal for UI Endowment Fund	100% (Fulfilled)*
4	June 19, 2025	Proposal for ITB Ultra Marathon 2025	100% (Fulfilled)
5	July 2, 2025	Proposal for BNI Expo/wondr X 2025	100% (Fulfilled)
6	July 28, 2025	Proposal for wondr is Everywhere	100% (Fulfilled)
7	September 30, 2025	Proposal for Sponsorship of the Pertamina MotoGP Grand Prix of Indonesia 2025	100% (Fulfilled))*
8	October 6, 2025	Review of the Implementation of ITB Ultra Marathon	100% (Fulfilled)
9	October 6, 2025	Update on Cooperation with Metro TV and Other Publishers	100% (Fulfilled)
10	October 24, 2025	Proposal for Final Tapenas Program	100% (Fulfilled)
11	October 24, 2025	Review of the Socialization of the KPP Alam Sutera Event	100% (Fulfilled)
12	November 28, 2025	Sponsorship of Noble Padel PIK	100% (Fulfilled)
13	November 28, 2025	BNI Customer Gathering Event – Chinese New Year 2026	100% (Fulfilled)
14	November 28, 2025	wondr Multicurrency Investment Special Program	100% (Fulfilled)
15	November 28, 2025	Addition of Out-of-Home (OOH) Media and Update on Media Partnerships	100% (Fulfilled)
16	December 29, 2025	Budget Proposal for Mass KUR Contract Signing Activities for 800,000 Debtors	100% (Fulfilled)*

*) Meetings were conducted through a circular resolution, which requires approval from all Chairpersons, Vice Chairpersons, and permanent members with voting rights.

TRAINING AND/OR COMPETENCY ENHANCEMENT OF THE BUSINESS COMMITTEE IN 2025

In 2025, all member of the Business Committee participated in various training, seminars, and workshops to maintain their expertise and competencies, ensuring effective execution of daily responsibilities. Information related to this has been described in the Company Profile Chapter, Competency Development Policy subchapter in the discussion entitled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance Chapter, Board of Directors subchapter, in the discussion entitled Training and/or Competency Improvement of the Board of Directors Members in 2025.

IMPLEMENTATION OF THE DUTIES OF THE BUSINESS SUB-COMMITTEES IN 2025

1. Product Sub-Committee (PRC)
   In 2025, the PRC Sub-Committee carried out its duties and responsibilities in accordance with its functions and implemented all work programs, including:
   a. Monitoring and reporting on the realization of the Bank Product Implementation Plan for the March 2025 period
   b. Monitoring and reporting on the realization of the Bank Product Implementation Plan for the June 2025 period;
   c. Monitoring and reporting on the realization of the Bank Product Implementation Plan for the September 2025 period;
   d. Submission of the Bank Product Implementation Plan for 2026.

2. Ecosystem Business Sub-Committee (ECO)
   Throughout 2025, the Ecosystem Business Sub-Committee (ECO) carried out its duties in accordance with the established responsibilities.

3. Marketing Strategy Sub-Committee (MKT)
   Throughout 2025, the MKT Sub-Committee held sixteen (16) meetings, with the objectives to:
   1. Determine the scale and direction of BNI's marketing and corporate branding strategy.
   2. Prioritize marketing and corporate branding strategic initiatives that have a significant impact on BNI's business and operations and are aligned with BNI's planning and budgeting.
   3. Review plans and monitor the realization of marketing strategies

BUSINESS COMMITTEE WORK PLAN FOR 2026

1. Product Sub-Committee (PRC)
   The PRC Sub-Committee has prepared its work plan for 2026, as follows:
   a. valuation of the progress of Bank Product Development for the September 2026 period and the Bank Product Implementation Plan for the March 2027 period.
   b. Evaluation of the progress of Bank Product Development for the March 2026 period and discussion of the Bank Product Implementation Plan for the June 2027 period.
   c. Evaluation of the progress of Bank Product Development for the June 2026 period and the Bank Product Implementation Plan for the September 2027 period.
   d. Evaluation of the progress of Bank Product Development for the September 2026 period and submission of the Bank Product Implementation Plan for 2027.

2. Ecosystem Business Sub-Committee (ECO)
   The Ecosystem Business Sub-Committee (ECO) has prepared its work plan for 2026, with a focus on determining the scale and strategy for executing selected customer/debtor/potential customer/potential debtor business ecosystems along with their respective value chains.

3. Marketing Strategy Sub-Committee (MKT)
   The MKT Sub-Committee has prepared its work plan for 2026 in line with its duties and responsibilities, as follows:
   1. Determining the scale and direction of BNI's marketing and corporate branding strategy for 2026.
   2. Prioritizing marketing and corporate branding strategic initiatives that have a significant impact on BNI's business and operations and are aligned with BNI's 2026 planning and budgeting.

PERFORMANCE MANAGEMENT COMMITTEE (PMC)

The Performance Management Committee (PMC) is one of the Permanent Committees at BNI, serving as a forum for budget monitoring policy management and streamlining the performance management process within BNI. This ensures the alignment of strategic planning while facilitating target setting and performance appraisals. The formation of this committee refers to Board of Directors Decree No. KP/460/DIR/R dated September 10, 2025, regarding the Restructuring of the Performance Management Committee.

PERFORMANCE MANAGEMENT COMMITTEE CHARTER

All PMC members are required to carry out their duties and responsibilities professionally and independently in order to achieve the Bank's targets by referring to the matters stipulated in the Performance Management Committee Charter. These guidelines have been stipulated by the Board of Directors through Decree of the Board of Directors No. KP/460/DIR/R dated September 10, 2025. The Performance Management Committee Charter is reviewed periodically, and if necessary, can be updated later in accordance with developments/changes in applicable legal regulations.

DUTIES AND RESPONSIBILITIES OF THE PERFORMANCE MANAGEMENT COMMITTEE

The description of the duties of the BNI PMC are as follows:

1. Strategic Planning
   a. Reviewing and ensuring alignment between the Corporate Plan, General Policy of the Board of Directors, the Bank's Business Plan and Budget Determination, and suggesting adjustments if necessary;
   b. Reviewing and approving the Bank's strategy and recommending changes to the Corporate Plan/Bank's Business Plan;
   c. Reviewing the performance review process that is carried out periodically.

2. Target Setting
   a. Approving and setting the annual schedule (timeline) and being responsible for Planning & Budgeting;
   b. Supervising and monitoring the progress of Planning & Budgeting activities;
   c. Reviewing and approving the suggested targets and/or budget adjustments (forecasting);
   d. Deciding on Capex proposals with certain criteria (business cases).

3. Performance Assessment
   a. Review, provide insight and approve KPIs at the Sectoral and Division/Unit/Functional Unit levels;
   b. Reviewing and providing recommendations for BNI's Board of Directors (BOD) KPIs;
   c. Reviewing and providing recommendations for BNI's SEVP KPIs;
   d. Providing recommendations to Sectoral & Divisions/Units/Functional Units regarding the determination and cascading of KPIs and targets;
   e. Reviewing the implementation of the performance management process on a sustainable basis;
   f. Providing recommendations for policy amendment initiatives to enhance the effectiveness of performance management;
   g. Reviewing and deciding the PMS scores for the Q4 period (whereas PMS scores for Q1, Q2, and Q3 periods are reviewed and decided by the Director supervising the PMS function);
   h. Acting as an arbitration body for issues related to performance measurement.

STRUCTURE AND MEMBERSHIP OF THE PERFORMANCE MANAGEMENT COMMITTEE

The Performance Management Committee (PMC) consists of members of the Board of Directors, along with Executive Officers one level below the Board who are appointed to serve. The structure and membership of the Performance Management Committee are determined by a Board of Directors Decree, which also serves as the official assignment of the Chairperson, Deputy Chairperson, and Committee Members.

The structure, membership, and voting rights status of the PMC as of December 31, 2025, pursuant to Board of Directors Decree No. KP/460/DIR/R dated September 10, 2025, are as follows:

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Corporate Planning & Performance Management Division Head (concurrently Permanent Member)	Holds no voting rights
Permanent Member at the Director & SEVP level	All Board of Directors & SEVP Members	Holds voting rights
Permanent Member at the Board of Directors level	Human Capital & Compliance Director	Holds no voting rights
Permanent Member at the Division/Unit/Functional Unit level	1. Corporate Planning & Performance Management Division Head 2. Internal Audit Unit Head 3. Human Capital Strategy Division Head 4. Treasury Division Head 5. AI & Big Data Analytics Division Head 6. Network Strategy & Development Division Head 7. Corporate Development & Transformation Division Head 8. Human Capital Business Partner Head	Holds no voting rights
Non Permanent Member	Division Head/Unit/Functional Unit related to the topic of discussion	Holds no voting rights

TERM AND TENURE OF THE PERFORMANCE MANAGEMENT COMMITTEE

The tenure of PMC membership follows the respective structural terms of office within BNI.

PROFILE OF THE CHAIRPERSON AND MEMBERS OF THE PERFORMANCE MANAGEMENT COMMITTEE

Comprehensive information on the profiles of PMC members is provided in the Company Profile chapter, specifically in the sub-chapters on the Board of Directors' Profile, Senior Executive Vice President (SEVP) Profile, and Executive Officers Profile.

CERTIFICATION OF THE PERFORMANCE MANAGEMENT COMMITTEE

BNI ensures that all PMC personnel meet the required qualification and competency certification standards in accordance with applicable regulations. In 2025, the PMC Committee has participated in a certification program in accordance with applicable regulations.

INDEPENDENCE STATEMENT OF THE PERFORMANCE MANAGEMENT COMMITTEE

All PMC members declare their ability and commitment to fulfilling their duties and responsibilities in compliance with prevailing regulations and Good Corporate Governance (GCG) principles.

MEETINGS OF THE PERFORMANCE MANAGEMENT COMMITTEE

Implementation of Performance Management Committee Meeting

The policies and procedures governing PMC meetings at BNI are as follows:

1. The Committee convenes meetings at least 2 (two) times per year or as necessary, at a designated venue, time, and date, to ensure all members are able to manage their attendance accordingly.
2 The Committee quorum shall include the chairperson, vice chairperson, and designated permanent members at the Director and SEVP levels. A quorum for a committee meeting is achieved if at least half of the committee's quorum is present, and the Chairperson and/or Vice Chairperson shall also be present.
3. In decision-making, only all voting members, consisting of Permanent and Non-Permanent Members at the Director and SEVP levels, shall be present at the meeting and shall have voting rights.

Meeting Frequency and Attendance Rate

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	February 3, 2025	January 2025 Financial Performance	100% (Fulffiled)
2	February 13, 2025	Finalization of Q4 2024 Unit PMS	100% (Fulffiled)
3	March 17, 2025	2025 Performance Review	100% (Fulffiled)
4	July 11, 2025	June 2025 Financial Performance	100% (Fulffiled)
5	August 12, 2025	July 2025 Financial Performance	100% (Fulffiled)
6	September 15, 2025	August 2025 Financial Performance	100% (Fulffiled)
7	October 14, 2025	September 2025 Financial Performance	100% (Fulffiled)
8	December 1, 2025	October 2025 Financial Performance	100% (Fulffiled)
9	December 22, 2025	2026 Unit KPI Governance	100% (Fulffiled)
10	1 Desember 2025	Financial Performance Oktober 2025	100% (Fulffiled)
11	22 Desember 2025	Governance KPI Unit 2026	100% (Fulffiled)

TRAINING AND/OR COMPETENCY ENHANCEMENT OF THE PERFORMANCE MANAGEMENT COMMITTEE IN 2025

All members of the PMC Committee have participated in several training activities, seminars, and workshops to enhance their competence and knowledge in relevant fields. Information related to this has been described in the Company Profile Chapter, Competency Development Policy subchapter in the discussion entitled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance Chapter, Board of Directors subchapter, in the discussion entitled Training and/or Competency Improvement of the Board of Directors Members in 2025

WORK PLAN OF THE PERFORMANCE MANAGEMENT COMMITTEE FOR 2025

Throughout 2025, BNI's PMC Committee undertook several initiatives and implemented work programs, including:

1. Reviewing and ensuring alignment between the Corporate Plan, the Board of Directors' General Policy, the Bank's Business Plan, and Budget Allocation.
2. Approving the RBB (Bank Business Plan) and RKAP (Work Plan and Budget) for 2025–2027.
3. Supervising and monitoring developments in Planning & Budgeting activities.
4. Providing recommendations on the determination and cascading of KPIs and targets for 2025.
5. Merekomendasikan dalam hal penentuan dan cascading (penurunan) KPI dan target tahun 2025.
6. Reviewing and finalizing the PMS (Performance Management System) scores for Q4 2023.

WORK PLAN OF THE PERFORMANCE MANAGEMENT COMMITTEE FOR 2026

PMC has outlined its work plan for 2026, focusing on the following strategic priorities:

1. Conducting a review of the 2026 RBB and RKAP.
2. Conducting Monthly Performance Reviews for 2026.
3. Reviewing and ensuring the alignment of KPIs with the Bank-wide strategy and targets for 2026.
4. Reviewing and evaluating PMS scores for Q1, Q2, and Q3.
5. Reviewing and finalizing the PMS scores for Q4 2025.
6. Reviewing and approving the 2027 – 2029 RBB and RKAP for 2026–2030.

TECHNOLOGY MANAGEMENT COMMITTEE (KMT)

In the midst of this era of rapid digital transformation, the Technology Management Committee (KMT) serves as a guide and guardian to ensure that technology is used optimally, thereby increasing the effectiveness of business strategies and responding to customer needs. This committee reviews the direction of technology development, from infrastructure investment and information systems to increasingly crucial cybersecurity policies.

The arrangement of the Technology Management Committee (KMT) was established through the Board of Directors Decree No. KP/461/DIR/R dated September 10, 2025, by adding new 3 (three) Subcommittees, namely the IT Project Committee (ITPC) Subcommittee, the Release Control Board (RCB) Subcommittee, and the IT Steering Committee (ITSC) Subcommittee.

TECHNOLOGY MANAGEMENT COMMITTEE CHARTER

The Technology Management Committee Charter was established as the primary governance framework guiding the Committee in overseeing the Bank's digital transformation. The Charter provides a clear mandate for the TMC to evaluate, direct, and ensure that all technology initiatives and innovations are fully aligned with business objectives, data security requirements, and applicable regulatory standards.

This Charter is subject to periodic review and update to ensure continued alignment with applicable regulations and the Bank's needs. In 2025, the BNI Technology Management Committee Charter was updated and formally enacted pursuant to Decree No. KP/461/DIR/R dated 10 September 2025.

DUTIES AND RESPONSIBILITIES OF THE TECHNOLOGY MANAGEMENT COMMITTEE

a. Technology Management Committee (TMC)

1) Establish IT policies, including but not limited to IT governance, IT architecture, IT risk management, cyber resilience & security, the use of IT service providers, electronic system placement, data management & personal data protection, internal control & internal audit, assessment of IT operations, IT development, IT operations, and IT activities within the financial conglomeration.
2) Establish the IT Strategic Plan (ITSP).
3) Establish the initial annual list of (bank-wide) IT development initiatives, by considering their alignment with the Bank's business strategy based on cost & benefit analysis.
4) Conduct evaluations, provide direction to Management, monitor, and provide recommendations regarding all IT activities, IT performance, IT performance improvement efforts, and the measurement of effectiveness & efficiency of IT governance implementation.

b. Sub-Committee: IT Project Committee (ITPC)

1) Establish the proposed initial annual list (prioritization) of IT development initiatives to be subsequently decided upon by the Technology Management Committee (TMC).
2) Establish ongoing annual (insertion) IT development project initiatives for implementation, considering their alignment with the Bank's business strategy based on cost & benefit analysis.

c. Sub-Committee: Release Control Board (RCB)

1) Approve proposed deployments of IT developments or IT system fixes to the production environment according to decision criteria, considering IT risk management.
2) Conduct evaluations, monitor, and provide recommendations regarding proposed deployments, considering IT risk management

d. Sub-Committee: IT Steering Committee (ITSC)

1) Conduct discussions/evaluations/decisions regarding the execution of IT projects (timeline, progress, scope, budget, resources).
2) Conduct discussions/evaluations/decisions regarding specific IT topics.

STRUCTURE AND MEMBERSHIP OF THE TECHNOLOGY MANAGEMENT COMMITTEE

KMT comprises all members of the Board of Directors, along with designated Executive Officers one level below the Board. The structure of BNI's KMT is determined based on its Terms of Reference (TOR), which also serves as the official designation of the Chairman, Deputy Chairman, and Committee Members.

Based on the Appendix to the Board of Directors' Decree No. KP/461/DIR/R dated September 10, 2025, regarding the Organization of the Technology Management Committee (KMT), the structure, membership, and voting rights status of the KMT as of December 31, 2025, are as follows:

1. Technology Management Committee (KMT)

Position on the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	IT Strategy & Architecture Division Head (concurrently serves as a Permanent Member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Deputy President Director 2. Treasury & International Banking Director 3. Commercial Banking Director 4. Risk Management Director 5. Finance & Strategy Director 6. Network & Retail Funding Director 7. Institutional Director 8. Corporate Banking Director 9. Consumer Banking Director 10. Operations Director 11. SEVP of Information Technology	Holds voting rights
Permanent Members at the Director Level	Human Capital & Compliance Director*	Holds voting rights
Permanent Members at the Division/Unit Level/ Functional Unit	1. IT Strategy & Architecture Division Head 2. Application Development Division Head 3. Wholesale Digital Delivery Division Head 4. Retail Digital Delivery Division Head 5. IT Application Services Division Head 6. IT Infrastructure Management Division Head 7. CISO Division Head 8. AI & Big Data Analytics Division Head 9. Retail Digital Channel Division Head 10. Wholesale Digital Channel Division Head 11. Enterprise Risk Management Division Head 12. Head of Operational Risk Management Division 13. Head of Compliance Division 14. Head of Corporate Planning & Performance Management Division 15. Head of Procurement & Fixed Assets Division 16. Human Capital Business Partner 17. Senior Operational Risk Executive Technology, Digital & Operations 18. Head of Internal Audit Unit	Holds no voting rights
Non-permanent Members (Non-voting Member)	Directors / SEVPs / Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the Committee's Work Guidelines

*) Specifically, the Director of Human Capital & Compliance has special duties and responsibilities as stipulated in the committee's work guidelines.

2. IT Project Committee (ITPC) Sub-Committee

Position on the Committee	Filled In by	Voting Rights Status
Chairman	Information Technology Director	Holds voting rights
Secretary	IT Strategy & Architecture Division Head (concurrently serves as a Permanent Member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Director overseeing IT development initiatives or relevant Director based on the discussion topic 2. Finance & Strategy Director 3. SEVP of Information Technology	Holds voting rights
Permanent Members at the Division/Unit Level/ Functional Unit	1. Corporate Planning & Performance Management Division Head 2. Division Head related to IT development initiatives or relevant to the discussion topic 3. Senior Operational Risk Executive Technology	Holds no voting rights
Permanent Members at the Director & SEVP Level	Director/SEVP related to the discussion topic	Holds no voting rights
Non-permanent Members	Head of Division/Unit/Functional Unit related to the discussion topic	Holds no voting rights

3. Release Control Board (RCB) Sub-Committee

Position on the Committee	Filled In by	Voting Rights Status
Chairman	Information Technology Director	Holds voting rights
Secretary	IT Strategy & Architecture Division Head (concurrently serves as a Permanent Member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Director and/or SEVP overseeing IT development initiatives 2. Finance & Strategy Director 3. SEVP of Information Technology	Holds voting rights
Permanent Members at the Division/Unit Level/ Functional Unit	1. IT Infrastructure Management Division Head 2. CISO Division Head 3. Senior Operational Risk Executive Technology, Digital & Operations 4. Head of Division related to IT development initiatives or relevant to the discussion topic 5. Enterprise Risk Management Division Head 6. Operational Risk Management Division Head 7. IT Strategy & Architecture Division Head	Holds no voting rights
Permanent Members at the Director & SEVP Level	Director/SEVP related to the discussion topic	Holds voting rights
Non-permanent Members	Head of Division/Unit/Functional Unit related to the discussion topic	Holds no voting rights

4. IT Steering Committee (ITSC) Sub-Committee

Position on the Committee	Filled In by	Voting Rights Status
Chairman	Information Technology Director	Holds voting rights
Secretary	Head of SKTI* Division (concurrently serves as a Permanent Member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. The Director and/or SEVP overseeing IT development initiatives and/or the Director and/or SEVP relevant to the topic of discussion 2. SEVP of Information Technology	Holds voting rights
Permanent Members at the Director & SEVP Level	Director/SEVP related to the discussion topic	Holds no voting rights
Non-permanent Members	Head of Division/Unit/Functional Unit related to the discussion topic	Holds no voting rights

TERM AND TENURE OF THE TECHNOLOGY MANAGEMENT COMMITTEE

In accordance with the charter established through Director's Decree No. KP/461/DIR/R dated September 10, 2025, the tenure of KMT membership follows the term of office in the structural positions at BNI.

PROFILE OF THE CHAIRPERSON AND MEMBERS OF THE TECHNOLOGY MANAGEMENT COMMITTEE

Comprehensive information regarding the profiles of KMT members is provided in the Company Profile chapter, under the sub-chapters: Profile of the Board of Directors, Profile of Senior Executive Vice Presidents (SEVPs), and Profile of Executive Officers.

CERTIFICATION OF THE TECHNOLOGY MANAGEMENT COMMITTEE

BNI ensures that all KMT personnel meet the required qualification and competency certification standards in accordance with applicable regulations. By 2025, KMT has fulfilled the established certification program.

INDEPENDENCE STATEMENT OF THE TECHNOLOGY MANAGEMENT COMMITTEE

BNI guarantees that all KMT members meet the required independence criteria and are capable of carrying out their duties independently, upholding the best interests of the Bank, and remaining free from any external influence. The KMT's statement of independence has been expressed in a Pledge of Integrity that is periodically renewed and signed by all KMT members.

MEETINGS OF THE TECHNOLOGY MANAGEMENT COMMITTEE

Implementation of Technology Management Committee

The policies and procedures for conducting KMT meetings at BNI are as follows:

1. Committee Meetings
   a. The committee shall convene meetings at least four (4) times a year.
   b. Additional meetings may be held beyond the standard schedule under the following circumstances:
      1) Emergency meetings may be convened when critical issues require immediate resolution. Decisions made by the committee shall be executed through the Committee Secretary.
      2) Limited meetings may be conducted with relevant Divisions/Units to formulate operational policies aligned with the committee's established policies.
2. The Committee/Subcommittee is allowed to hold an unexpected meeting considering the importance of the issue that requires immediate decision.
3. The quorum of the Committee/Subcommittee shall include the chairperson, vice chairperson, and standing members at the level of the Board of Directors and SEVP as determined. The quorum of the Committee/Subcommittee shall be achieved if at least more than ½ (half) of the quorum of the Committee/Subcommittee is present and must be attended by the Chairperson and/or Vice Chairperson.
4. In decision-making, only all voting members, consisting of Permanent and Non-Permanent Members Committee/Subcommittee at the Director and SEVP levels, shall be present at the meeting and shall have voting rights.

Frequency and Attendance Rate

Period January 1, 2025 – September 9, 2025

1. Technology Management Committee

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	February 24, 2025	KMT: Knowledge Management System with Gen AI; LMS Retail Update	90% (Fulfilled)
2	March 10, 2025	KMT: Approval of the 2025–2029 SOE IT Strategic Plan (RSTI); and 2025 Eid Readiness Update	100% (Fulfilled)
3	April 21, 2025	KMT: Review of 2025 Eid Holiday Activities; and Core Banking Modernization Update	90% (Fulfilled)
4	July 14, 2025	KMT: Progress of IT Project Implementation & Automation CAPEX Realization; Cybersecurity Threats & How We Protect Customers	100% (Fulfilled)
5	March 6, 2025	ITPC: Establishment of IT project development initiatives including Autodebit, JITU application enhancement, Pre-Production Infrastructure and Critical Application Testing, Operational Infrastructure Tools Development, Security Preventions 2025, Govtech 2025, Acceptance of Mastercard Payment Gateway Services (MPGS) in BNI Acquiring, RPA Enhancement 2025, Security Operations 2025, Axway Development, Avatar 2025, WEM Investment System Enhancement 2025, HCMS Core Upgrade, ECM (Enterprise Content Management) – EPP Development, Citynet Rec 7 Reconciliation Engine Enhancement, ODS & ODW Professional Services, Virtualization Server License, IT Development Support Services	100% (Fulfilled)

No.	Date	Meeting Agenda	Attendance Quorum (%)
6	May 14, 2025	ITPC: Establishment of IT project development initiatives including Emission Management Platform, Blockchain-Based Credit Document Integrity System	100% (Fulfilled)
7	May 22, 2025	ITPC: Establishment of IT project development initiatives including Retail Billing Payment, PSAK 71 Application License, Balance Sheet & Liquidity Risk System (BaSeLS), Risk Management Information System (RMIS), ATM Replacement with CRM – 2025, Transaction-Based Lending (BWU Pandu Mikro – Value Chain, Digital, Agency, Invoice Financing), Agricultural Sector Credit Process Digitalization, Big Data License, BNI Corporate Website Revamp, Treasury Surrounding System Enhancement, Metadata Management Solution, Enhancement for PPATK Regulatory Requirements 2025	100% (Fulfilled)
8	June 23, 2025	ITPC: Establishment of IT project development initiatives including Graph Database Technology, Wondr Project Development License	100% (Fulfilled)
9	July 2, 2025	ITPC: Establishment of IT project development initiatives including eLo Bridging Enhancement, BNI Fleksi Digital Loan Wondr Feature, BNI Kasbon and BNI PayLater	100% (Fulfilled)
10	July 10, 2025	ITPC: Establishment of IT project development initiatives including Join Financing Enhancement, Multi-Currency Savings, Database System Capability & Availability and Recovery	100% (Fulfilled)
11	August 2, 2025	ITPC: Establishment of IT project development initiatives including KFTC Electronic Banking, IT QA Support for System/Application Testing (Test Engineer & Functional Tester), BNIMove RPB, Tableau Server Core Software License, Enterprise Event Bus (EEB) Subscription	100% (Fulfilled)
12	January 22, 2025	ITSC: Treasury Management System Project – System Integration Test (SIT) Report	100% (Fulfilled)
13	February 18, 2025	ITSC: LMS Retail Project – Interim Solution Follow-Up	100% (Fulfilled)
14	March 3, 2025	ITSC: International Wealth Management System (i-Wealth) Project – Singapore Compliance Approval	100% (Fulfilled)
15	March 6, 2025	ITSC: Avatar Project – Scoping, Prioritization, Target, Governance & Risk	100% (Fulfilled)
16	March 7, 2025	ITSC: Centralization of Overseas Branches System Project – Progress Report and KLN Go-Live Target Determination	100% (Fulfilled)
17	March 18, 2025	ITSC: International Wealth Management System (i-Wealth) Project – Singapore Soft Launch Check	100% (Fulfilled)
18	March 21, 2025	ITSC: Treasury Management System Project – User Acceptance Test (UAT) Report	100% (Fulfilled)
19	April 28, 2025	ITSC: Personal Data Protection Project – Consent Management and Cookies Management	100% (Fulfilled)
20	May 2, 2025	ITSC: International Wealth Management System (i-Wealth) Project – Singapore Post-Launch Report	100% (Fulfilled)
21	May 6, 2025	ITSC: Treasury Management System Project – Performance Test Report	100% (Fulfilled)
22	May 27, 2025	ITSC: Climate Risk Stress Testing (CRST) Project – Release 1 Report and Go-Live Plan for Release 2	100% (Fulfilled)
23	May 28, 2025	ITSC: Avatar Project – Cadence, Trade Limit, Implementation of Trade & Supply Chain Command Center	100% (Fulfilled)
24	June 4, 2025	ITSC: Treasury Management System Project – Mock Run Report	100% (Fulfilled)
25	July 3, 2025	ITSC: Wondr Project – Release 4 Activities	100% (Fulfilled)
26	July 4, 2025	ITSC: Avatar Project – Account Plan, Servicing, Internal Tools	100% (Fulfilled)
27	July 21, 2025	ITSC: Treasury Management System Project – Runbook Implementation Report and Go/No-Go	100% (Fulfilled)
28	August 8, 2025	ITSC: Treasury Management System Project – Application Switch Over / Switch Back Activities	100% (Fulfilled)
29	August 12, 2025	ITSC: Avatar Project – Limit Mechanism and Flow, and Outstanding Limit	100% (Fulfilled)
30	August 25, 2025	ITSC: Wondr Project – Onboarding Evaluation	100% (Fulfilled)
31	August 29, 2025	ITSC: Wondr Project – Fraud Detection Update and Release 4.2	100% (Fulfilled)

Period September 10, 2025 – December 31, 2025

1. Technology Management Committee

No	Date	Meeting Agenda	Attendance Quorum (%)
1	October 14, 2025	Progress of IT Project Implementation as of Q3 2025, and IT Planning Session 2026	95.8% (Fulfilled)
2	November 24, 2025	Update on Subsidiaries Synergy; Proposed Revision of the 2024–2028 IT Strategic Plan (RSTI); Proposed 2026 IT Project Portfolio; Proposed 2026 IT Development Plan (RPTI)	100% (Fulfilled)
3	December 22, 2025	Year-End/Nataru Operational Update; Update on Fraud Detection System Improvement Crash Plan	83.3% (Fulfilled)

2. IT Project Committee (ITPC) Sub-Committee

No	Date	Meeting Agenda	Attendance Quorum (%)
1	September 12, 2025	Establishment of IT project development initiatives including Professional Services for Enterprise Data Platform Development, Development of Storage and Backup Devices to support capacity enhancement of ODS, ODW, THE and ETL systems, Wondr by BNI Development Release 5 – Release 8, Red and White Village Cooperative Financing Program (KDKMP)	100% (Fulfilled)
2	October 9, 2025	Establishment of IT project development initiatives including Enhancement of Acquiring System, Modernization of Klingon Features to WebMethods, Enhancement of Credit Card Issuing System	100% (Fulfilled)
3	October 15, 2025	Establishment of IT project development initiatives including HC Strategic Module, Notification Engine	100% (Fulfilled)
4	November 18, 2025	Establishment of IT project development initiatives including Operational Risk Management System (ORMS), Enhancement of e-Polis	100% (Fulfilled)
5	December 12, 2025	Establishment of IT project development initiatives including Test Data Management, Development and Refreshment of Network Devices at Branches and BNI Buildings, Enhancement of Compliance Information Management System (CIMS), Enterprise License Agreement Microfocus	100% (Fulfilled)
6	December 31, 2025	Establishment of IT project development initiatives including Pooling of IT Strategic Partner Support Services, Core Service Segmentation, IBM WebMethods Advisory Services, Additional API Gateway Capacity (Axway) – Wondr Project	100% (Fulfilled)

3. Release Control Board (RCB) Sub-Committee

Throughout 2025, there were no decisions taken under the authority of the RCB Sub-Committee.

4. IT Steering Committee (ITSC) Sub-Committee

No	Date	Meeting Agenda	Attendance Quorum (%)
1	September 30, 2025	Enterprise Financial System (EFS) Project – Wave 1 Report (End User Training)	100% (Fulfilled)
2	November 4, 2025	Enterprise Financial System (EFS) Project – Wave 1 Report (Parallel Run)	100% (Fulfilled)
3	December 12, 2025	Enterprise Financial System (EFS) Project – Wave 2 Report (Development)	83.3% (Fulfilled)

TRAINING AND/OR COMPETENCY ENHANCEMENT FOR THE TECHNOLOGY MANAGEMENT COMMITTEE IN 2025

In 2025, the Chairperson and members of the Technology Management Committee (KMT) participated in various training programs, seminars, and workshops to maintain their expertise and competencies in support of their daily responsibilities. Information related to this matter has been described in the Company Profile Chapter, Competency Development Policy subchapter in the discussion entitled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance Chapter, Board of Directors subchapter, entitled Training and/or Competency Improvement of the Board of Directors Members in 2025.

IMPLEMENTATION OF THE TECHNOLOGY MANAGEMENT COMMITTEE'S DUTIES IN 2025

Throughout 2025, BNI's Technology Management Committee (KMT) carried out various activities and implemented work programs in accordance with its assigned duties and responsibilities.

TECHNOLOGY MANAGEMENT COMMITTEE'S WORK PLAN FOR 2026

The Technology Management Committee (KMT) has outlined its work plan for 2026, prioritizing the following strategic areas:

1. IT Project Portfolio 2026; IT Project Implementation and IT CAPEX Realization Progress H1/2026;
2. IT Operation Updates H1/2026;
3. IT Project Implementation and IT CAPEX Realization Progress H2/2026, serta IT Planning 2027;
4. IT Operation Updates H2/2026.

CREDIT POLICY COMMITTEE (KRB)

The Credit Policy Committee (KRB) is one of the committees at BNI that plays a role in providing recommendations to the Board of Directors regarding the Bank's credit policy to improve the quality of the credit portfolio and oversee the implementation of credit granting.

The Credit Policy Committee (KRB) consists of 2 (two) subcommittees, namely the Credit Policy Sub-committee (KKP) and the Credit Procedures Sub-committee (KKP), that have the authority to provide input on policy formulation and make decisions on credit procedures in accordance with the duties and responsibilities of each subcommittee. The Credit Policy Committee underwent restructuring through Board of Directors Decree No. KP/457/DIR/R dated September 10, 2025, regarding the Restructuring of the Credit Policy Committee (KRB).

CREDIT POLICY COMMITTEE CHARTER

To enhance the effectiveness of the Credit Policy Committee's duties and responsibilities, BNI has established the Credit Policy Committee Charter, which was formalized through Board of Directors Decree No. KP/457/DIR/R dated September 10, 2025. This charter is periodically reviewed and updated in accordance with applicable legal and regulatory developments.

DUTIES AND RESPONSIBILITIES OF THE CREDIT POLICY COMMITTEE

1. Credit Policy Sub-Committee (KKP)
   a. Establishing the Bank's Credit Policy (KPB), particularly in relation to prudential credit principles, for submission to the Board of Commissioners for approval.
   b. Overseeing the implementation and execution of Bank Credit Policy, Treasury & International/Financial Institution Business, and Trade Business in a consistent and coherent manner, as well as conducting reviews if there are obstacles/constraints in the implementation of Bank Credit Policy, Treasury & International/Financial Institution Business, and Trade Business.
   c. Conducting periodic reviews of Bank Credit Policies, Treasury & International/Financial Institution Business, and Trade Business and, if necessary, determining changes/improvements to Bank Credit Policies, Treasury & International/Financial Institution Business, and Trade Business.
   d. Memantau dan mengevaluasi antara lain:
      1) Drive operational efficiency and scalability by accelerating the digitalization of business processes and customer service, including the development of e-Policy, bPOS, Mobile DigiClaim, and Face Recognition technology.
      2) Improve decision-making accuracy and service speed by implementing Robotic Process Automation (RPA) and Artificial Intelligence (AI) technology in the Underwriting and Claims functions.
      3) Strengthen risk management and compliance through systematic control testing to ensure the effectiveness of internal controls and regulatory compliance.
      4) Maintain organizational relevance and resilience through periodic evaluation and refinement of the organizational structure and business process reviews.
      5) Expand the marketing reach of productive credit life insurance products for the MSME segment.
      6) Improve the quality of customer service with a data-driven approach and customer satisfaction feedback.
      7) Optimize data analytics and data management capabilities to support more targeted business segmentation in developing cross-selling opportunities.

e. Submitting periodic written reports to the Board of Directors, with a copy to the Board of Commissioners, regarding the results of supervision of the implementation and execution of the Bank's Credit Policy and the results of monitoring and evaluation of the matters referred to in point 1.a. above.
f. Formulating and recommending steps to improve the implementation of Bank Credit activities, Treasury & International/Financial Institution Business, and Trade Business.
c. Monitoring and evaluating the following aspects:
   1) The overall development and quality of the credit portfolio.
   2) The proper exercise of credit approval authority.
   3) The accuracy of credit granting processes, particularly for related parties and large corporate debtors.
   4) Compliance with Legal Lending Limits (BMPK), Good Corporate Governance (GCG), and Risk Management Implementation.
   5) Adherence to regulatory and legal provisions in credit operations.
   6) The resolution of non-performing loans in line with the Bank's Credit Policy.
   7) The Bank's efforts in maintaining an adequate level of credit loss provisions.

2. Credit Procedures Sub-Committee (KPP)
   a. Establishing credit procedures and operational guidelines.
   b. Defining the Lending Model, which refers to specific operational policies and credit procedures tailored for particular market segments, industries, or regions while adhering to prudential banking principles and Good Corporate Governance (GCG).
   c. Formulating procedures and operational guidelines for Treasury, International Business, and Financial Institutions.

STRUCTURE AND MEMBERSHIP OF THE CREDIT POLICY COMMITTEE

The Credit Policy Committee (KRB) comprises members from the Board of Directors, along with executive officers one level below the Board, who are appointed by decree. The membership structure of KRB is formalized through a Board of Directors Decree, which also determines the roles of the Chairperson, Vice Chairperson, and Committee Members.

As of December 31, 2025, the structure, membership, and voting rights within the Credit Policy Committee are outlined in Board of Directors Decree No. KP/457/DIR/R dated September 10, 2025, regarding the Restructuring of the Credit Policy Committee (KRB):

1. Credit Policy Sub-Committee (KKP)

Position on the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Policy Governance Division Head (concurrently serves as a permanent member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Risk Management Director 2. Corporate Banking Director 3. Treasury & International Banking Director 4. Institutional Director 5. Commercial Banking Director 6. Consumer Banking Director 7. Network & Retail Funding Director 8. Operations Director 9. SEVP of Legal & Governance	Holds voting rights
Permanent Members at the Director Level	Human Capital & Compliance Director*	Holds no voting rights
Permanent Member (Division/ Unit/ Functional Unit Head level)	1. Enterprise Risk Management Division Head 2. Legal Division Head 3. Compliance Division Head 4. Head of Internal Audit Unit	Holds no voting rights
Non-permanent Members	Directors/SEVPs/Heads of Divisions, Units, or Functional Units relevant to the topics under discussion	As stipulated in the Committee's Work Guidelines

*Specifically, the Director of Human Capital & Compliance has special duties and responsibilities as stipulated in the committee's work guidelines.

2. Credit Procedure Sub-Committee (KPP)

Position on the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Deputy President Director	Holds voting rights
Secretary	Policy Governance Division Head (concurrently serves as a non-voting permanent member)	Holds no voting rights
Permanent Members at the Director & SEVP Level	1. Risk Management Director 2. Sector Director (according to the proposing unit and/or relevant to the discussion topic) 3. SEVP of Legal & Governance	Holds voting rights
Permanent Member (Division/ Unit/ Functional Unit Head level)	1. Legal Division Head 2. Compliance Division Head 3. Head of Internal Audit Unit 4. Head of Division/Unit/Functional Unit relevant to the discussion topic	Holds no voting rights
Non-permanent Members	Head of Division/Unit/Functional Unit related to the discussion topic	As regulated in the committee's work guidelines

TERM AND DURATION OF SERVICE FOR THE CREDIT POLICY COMMITTEE

The tenure of the members of the Credit Policy SubCommittee (KKP) is determined in alignment with their respective structural terms at BNI.

PROFILE OF THE CHAIRPERSON AND MEMBERS OF THE CREDIT POLICY COMMITTEE

Comprehensive information on the profiles of the members of the Credit Policy Committee (KKP) is detailed in the Company Profile Chapter, under the subchapters Profile of the Board of Directors, Profile of the Senior Executive Vice President (SEVP), and Profile of Executive Officers.

CERTIFICATION OF THE CREDIT POLICY COMMITTEE

BNI ensures that all personnel of the Credit Policy Committee meet the required qualification standards and competency certifications in accordance with prevailing regulations. In 2025, the Credit Policy Committee will have participated in the designated certification program.

INDEPENDENCE STATEMENT OF THE CREDIT POLICY COMMITTEE

The Credit Policy Committee is fully capable of performing its duties, responsibilities, and authority professionally and independently, without interference from any party that is not in accordance with applicable laws and regulations. All members of the Credit Policy Committee declare that they meet the independence criteria and are capable of carrying out their responsibilities independently, upholding the best interests of the Bank, and remaining uninfluenced by any external party. The Independence Statement of the Credit Policy Committee is disclosed in the Integrity Pact, which is periodically updated and signed by all committee personnel.

MEETINGS OF THE CREDIT POLICY COMMITTEE

Implementation of Credit Policy Committee Meeting

The policies and procedures for conducting Credit Policy Committee meetings are as follows:

1. The sub-committees hold meetings at designated locations, times, and dates to allow all members to arrange their attendance. The meeting frequency is as follows:
   a. The Credit Policy Subcommittee (KKP) shall meet at least once every three (3) years or as needed at a specific place, time, and date that has been determined so that all members can arrange their schedules to attend.
   b. The Credit Procedures Subcommittee (KPP) shall meet at least four (4) times a year or as needed at a specific place, time, and date that has been determined so that all members can arrange their time to attend.
2. The Subcommittee may hold emergency meetings considering the importance of issues that require immediate decisions.
3. The quorum of the Subcommittee shall consist of the Chair, Vice Chair, and standing members at the level of Director & SEVP as determined. The quorum of the Subcommittee meeting shall be reached if at least more than ½ (half) of the Subcommittee quorum is present and the Chair and/or Vice Chair must be present.
4. In decision-making, only all voting members, consisting of Permanent and Non-Permanent Members at the Director and SEVP levels, shall be present at the meeting and shall have voting rights.

Frequency and Quorum

1. Credit Policy Sub-Committee (KKP)

No.	Date	Meeting Agenda	Quorum
1	April 21, 2025	Decision of the Credit Policy Committee Credit Policy Sub-Committee (KRB-KKP) No.01 2025 Dated April 21, 2025	100% (Fullfilled)

2. Credit Procedure Sub-Committee (KPP)

No.	Date	Meeting Agenda	Quorum
1	February 14, 2025	Review of Third-Party Collateral related to the Collateral Submission Statement Letter	100% (Fullfilled)
2	February 14, 2025	Review of the Extension of the Validity Period of Credit Decision Letters (SKK)	100% (Fullfilled)
3	April 24, 2025	Review of Provisions for Granting Credit Facilities to Ministries/Government Agencies of the Republic of Indonesia	100% (Fullfilled)
4	May 5, 2025	Review of Pre-Approved Facility (PAF) for Natural Resources Export Proceeds (DHE SDA)	100% (Fullfilled)
5	May 5, 2025	Review of Cash Collateral Credit Features for Export Proceeds Foreign Exchange (CCC DHE)	100% (Fullfilled)
6	May 9, 2025	Review of Provisions for Plantation Investment Credit Facilities under the Nucleus-Plasma Cooperation Pattern	100% (Fullfilled)
7	May 27, 2025	Proposed Review of Provisions for the Utilization of Natural Resources Export Proceeds (DHE SDA) through Foreign Exchange Transactions	100% (Fullfilled)
8	June 16, 2025	Review of Provisions for Plantation Investment Credit Facilities under the Nucleus-Plasma Partnership Pattern regarding Changes in Credit Processing Units	100% (Fullfilled)
9	June 24, 2025	Review of Authority to Decide Restructuring and the Restructuring Time Period	100% (Fullfilled)
10	July 3, 2025	Provisions for the Utilization of Credit from the Ministry of Finance (MoF)	100% (Fullfilled)
11	July 11, 2025	Review of Derivative Credit Procedures of BNI KPB 2025 and Other Procedures	100% (Fullfilled)
12	July 16, 2025	Review of Authority to Decide Remedial & Recovery for Corporate & Enterprise Segments and Commercial Segments	100% (Fullfilled)
13	July 16, 2025	Review of Productive Retail Lending Model	100% (Fullfilled)
14	July 24, 2025	Seagull Option Provisions	100% (Fullfilled)
15	July 24, 2025	Review of Forfaiting Purchase Provisions & Forfaiting Sale Provisions	100% (Fullfilled)
16	July 23, 2025	BMPK Calculation and Authority to Decide Credit for Independent Power Producers (IPP)	100% (Fullfilled)
17	July 30, 2025	Distribution of Business and Risk Functions for Directors, SEVPs, and SBX/SCX within the Credit Committee	100% (Fullfilled)
18	August 6, 2025	Flexible Forward Provisions	100% (Fullfilled)
19	August 13, 2025	Pre-Approved Facility (PAF) and Indicative Offering Letter	100% (Fullfilled)
20	August 13, 2025	Review of Authority to Decide Non-Principal Write-Offs (Interest, Fines, Costs/ BDO) for the Productive Retail Remedial & Recovery Unit	100% (Fullfilled)
21	August 13, 2025	Determination and Reporting of BNI Debtor Credit Quality Differences Against Other Creditors	100% (Fullfilled)
22	August 27, 2025	Review of Cash Collateral Credit (CCC) Provisions for Corporate, Enterprise, Commercial, and SME Segments	100% (Fullfilled)
23	August 27, 2025	Review of Bond Collateral Credit (BCC) Provisions for Corporate, Enterprise, Commercial, and SME Segments	100% (Fullfilled)
24	September 3, 2025	Financing Scheme for Free Nutritious Meals (MBG)	100% (Fullfilled)
25	September 10, 2025	Provisions for Simplifying the Credit Review Process for Commercial and SME Segments	100% (Fullfilled)
26	September 19, 2025	Financing Scheme for Red and White Village/Sub-district Cooperatives (KDMP/KKMP)	100% (Fullfilled)
27	September 24, 2025	Review of BNI Griya Instan Approval (BNI Griya Insapp)	100% (Fullfilled)
28	September 24, 2025	Provisions for Subordinated Loans to Subsidiaries	100% (Fullfilled)
29	September 24, 2025	Review of Country Exposure Limit (CEL) Provisions	100% (Fullfilled)
30	October 1, 2025	Authority to Decide Credit for SME & Consumer Segments related to the Implementation of New Region Area & Branch Model for Pilot W08 and W15	100% (Fullfilled)

No.	Date	Meeting Agenda	Quorum
31	October 1, 2025	Financing Scheme for Housing Program Credit (KPP)	100% (Fullfilled)
32	October 8, 2025	Investment Credit Scheme for Supply Infrastructure Financing (SIF) with BPJS Kesehatan Partners	100% (Fullfilled)
33	October 8, 2025	Proposed Review and Expansion of Pre-Financing Facility Scheme (SPAN)	100% (Fullfilled)
34	October 22, 2025	Open Account Financing (OAF) Provisions	100% (Fullfilled)
35	October 22, 2025	Provisions for Canceling the Free Nutritious Meals (MBG) Financing Scheme	100% (Fullfilled)
36	October 29, 2025	KMK Sugarcane Cultivation Provisions under the Nucleus-Plasma Partnership Pattern	100% (Fullfilled)
37	October 29, 2025	Financing Scheme for Labor-Intensive Industrial Credit (KIPK)	100% (Fullfilled)
38	October 29, 2025	Financing Scheme for Agricultural Tools and Machinery Credit (Kredit Alsintan)	100% (Fullfilled)
39	November 5, 2025	Diaspora Loan Provisions	100% (Fullfilled)
40	November 5, 2025	Review of FRN (Floating Rate Notes) Securities Provisions, OIS (Overnight Index Swap), and Expansion of Underlying Repo Transactions	100% (Fullfilled)
41	November 12, 2025	Review of Credit Payment Priority Provisions	100% (Fullfilled)
42	November 26, 2025	Review of BNI Instan Provisions Secured by Rupiah or USD Deposits and Review of Authority to Decide Consumer Credit Granting Cooperation and Consumer Credit Portfolio Purchase (Bulk)	100% (Fullfilled)
43	December 3, 2025	Reverse Repo Provisions with Customers	100% (Fullfilled)
44	December 17, 2025	Review of Credit Restructuring Scheme Provisions for Regions and/or Specific Sectors Affected by Disasters	100% (Fullfilled)

TRAINING AND COMPETENCY ENHANCEMENT OF THE CREDIT POLICY COMMITTEE IN 2025

In 2025, the chairman and members of the Credit Policy Committee have participated in various training activities, seminars, and workshops to maintain and improve their skill and competency levels, thereby supporting the effective implementation of their daily tasks. More detailed information on these training and competency development activities is described in the Company Profile Chapter, Competency Development Policy Sub-chapter in the discussion entitled Competency Development Based on Job Level and Gender Equality in 2025, as well as in the Corporate Governance Chapter, Board of Directors Sub-chapter, in the discussion entitled Training and/or Competency Improvement.

IMPLEMENTATION OF THE CREDIT POLICY COMMITTEE'S DUTIES IN 2025

1. Credit Policy Sub-Committee (KKP)
   In 2025, the Credit Policy Sub-Committee (KKP) carried out its duties and responsibilities in accordance with its functions, while taking into account market conditions and the principles of prudence and Good Corporate Governance.
2. Credit Procedures Sub-Committee (KPP)
   Throughout 2025, the Credit Procedures Subcommittee (KPP) carried out its duties and responsibilities in establishing procedures and provisions while adhering to the principles of prudence and good corporate governance.

WORK PLAN OF THE CREDIT POLICY COMMITTEE FOR 2026

1. Credit Policy Sub-Committee (KKP)
   In order to ensure the effectiveness of the Bank's Credit Policy (KPB), BNI consistently conducts periodic reviews of the policy. These reviews take into account developments in external regulations and business dynamics, while continuing to prioritize the application of prudential banking principles and caution in order to support sustainable performance and sound risk management.
2. Credit Procedures Sub-Committee (KPP)
   The Credit Procedures Subcommittee (KPP) has established a work plan for 2026, which includes reviewing credit procedures, lending models, institutional business, treasury, international business, and trade business.

HUMAN CAPITAL COMMITTEE (KHC)

The Human Capital Committee (KHC) is one of BNI's committees, authorized to formulate human capital management strategies aligned with BNI's vision, mission, and strategy to develop high-performing and competent human resources.

The Human Capital Committee consists of two subcommittees:
1. Human Capital Strategy & Policy Sub-Committee (HSP).
2. Executive Talent Sub-Committee (ETC).

HUMAN CAPITAL COMMITTEE CHARTER

The Human Capital Charter serves as a guideline for the committee to formulate policies on how to treat, develop, and empower every individual, enabling them to deliver their best contribution while achieving sustainable self-development.

The Human Capital Committee (KHC) operates under a charter that defines its membership, structure, authority, duties, responsibilities, meetings, activities, and governance procedures. The KHC Charter was established by the Board of Directors through Decree No. KP/458/DIR/R dated September 10, 2025, and is periodically reviewed to ensure alignment with prevailing regulations and the Bank's needs.

DUTIES AND RESPONSIBILITIES OF THE HUMAN CAPITAL COMMITTEE

1. Human Capital Strategy & Policy Sub-Committee (HSP)
   The Human Capital Strategy & Policy Sub-Committee is responsible for setting the strategic direction for human capital management in alignment with BNI's overall strategy.
2. Executive Talent Sub-Committee (ETC)
   The Executive Talent Sub-Committee (ETC) is responsible for managing the talent cycle for Division Heads, Regional Manager, Overseas Offices General Manager, and equivalent positions. This includes the appointment of management teams within subsidiaries, in accordance with applicable governance and authority structures.

STRUCTURE AND MEMBERSHIP OF THE HUMAN CAPITAL COMMITTEE

The Human Capital Committee (KHC) consists of members of the Board of Directors, supplemented by appointed Executive Officers one level below the Board of Directors. The KHC membership structure is established through a Board of Directors Decree, which concurrently serves as, or is recognized as, the official assignment of the Chairperson, Vice-Chairperson, and Committee Members.

Based on the Board of Directors' Decree No. KP/458/DIR/R dated September 10, 2025, regarding the Structuring of the Human Capital Committee (KHC), the composition, membership, and voting rights status of the Human Capital Committee as of December 31, 2025, are as follows:

1. Human Capital Strategy & Policy Sub-Committee (HSP)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Secretary	Human Capital Strategy Division Head (concurrently permanent member)	Holds no voting rights
Permanent Member at the Board of Directors level	1. Deputy President Director 2. Human Capital & Compliance Director 3. Finance & Strategy Director 4. SEVP Human Capital	Holds voting rights
Non Permanent Member	Director of the relevant Directorate /SEVP/Head of Division/Unit/ Functional Unit related to the discussion topic	As stipulated in the committee working guidelines

2. Executive Talent Committee Sub-Committee (ETC)

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Secretary	Human Capital Strategy Division Head (concurrently a permanent member)	Holds no voting rights
Permanent Member at the Board of Directors level	1. Deputy President Director 2. All Members of the Board of Directors	Holds voting rights
Non Permanent Member	SEVP related to the discussion topic	As stipulated in the committee working guidelines

TERM AND TENURE OF THE HUMAN CAPITAL COMMITTEE

The tenure of the Human Capital Committee members follows the respective structural tenure periods within BNI.

PROFILE OF THE CHAIRPERSON AND MEMBERS OF THE HUMAN CAPITAL COMMITTEE

Comprehensive information on the profiles of the Human Capital Committee (KHC) members is detailed in the Company Profile Chapter, under the subchapters Board of Directors Profile, Senior Executive Vice President (SEVP) Profile, and Executive Officers Profile.

CERTIFICATION OF THE HUMAN CAPITAL COMMITTEE

BNI ensures that all personnel within the Human Capital Committee (KHC) meet the required qualification standards and competency certifications in accordance with applicable regulations. In 2025, the Human Capital Committee has participated in the established certification program.

INDEPENDENCE STATEMENT OF THE HUMAN CAPITAL COMMITTEE

The Human Capital Committee (KHC) at BNI carries out its duties, responsibilities, and authority professionally and independently, free from any undue influence that contradicts prevailing laws and regulations. The committee's independence statement is formally documented in an Integrity Pact, which is periodically reviewed and signed by all committee personnel.

MEETINGS OF THE HUMAN CAPITAL COMMITTEE

Implementation of Human Capital Committee Meeting

The policies and procedures for holding Human Capital Committee meetings at BNI are as follows:

1. The Human Capital Committee (KHC) must convene at least twice a year or as needed at a predetermined location, date, and time to ensure all members can schedule their attendance.
2. The Sub-Committee may hold emergency meetings considering the importance of issues that require immediate decisions.
3. The Sub-Committee quorum shall include the Chair and permanent members at the level of Directors & SEVP as determined. The Sub-Committee meeting quorum shall be achieved if at least more than ½ (half) of the Sub-Committee quorum is present and the Chair must be present.
4. In decision-making, only all voting members, consisting of permanent and non-permanent members of the Sub-committee at the Director and SEVP level, who are present at the meeting shall have voting rights.

Frequency and Attendance Rate

1. Human Capital Strategy & Policy Sub-Committee (HSP)

No.	Date	Meeting Agenda	Attendance Quorum (%)
1	November 18, 2025	1. Review of Overseas Scholarship Policy 2. Career Progression (Talent Acceleration)	100% (Fulfilled)
2	December 19, 2025	Review of Remuneration for Overseas Branch Home Staff	100% (Fulfilled)

2. Executive Talent Sub-Committee (ETC)

No.	Date	Meeting Agenda	Attendance Quorum (%)
1.	January 13, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
2.	February 03, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
3.	February 17, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
4.	March 10, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
5.	March 17, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
6.	April 09, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
7.	June 02, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
8.	June 10, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
9.	June 25, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
10.	July 28, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
11.	August 04, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
12.	August 22, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
13.	September 08, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
14.	September 17, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
15.	September 24, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
16.	October 27, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
17.	November 03, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)
18.	December 22, 2025	Executive Talent Committee (ETC)	100% (Fulfilled)

TRAINING AND/OR COMPETENCY DEVELOPMENT OF THE HUMAN CAPITAL COMMITTEE IN 2025

Throughout 2025, the Human Capital Committee continued to strengthen its role as a strategic partner of the company by ensuring that each of its members had the latest competencies in line with industry dynamics and modern employment challenges. Information related to this is outlined in the Company Profile chapter, Sub-chapter Competency Development Policy in the discussion entitled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance Chapter, Sub-chapter Board of Directors, in the discussion entitled Training and/or Competency Improvement of Board Members in 2025.

IMPLEMENTATION OF HUMAN CAPITAL COMMITTEE DUTIES IN 2025

Throughout 2025, the Human Capital Committee (KHC) has carried out its responsibilities, including:

1. Establishing Employee Performance Assessment, Employee Classification, and Annual Bonus policies;
2. Managing the promotion, rotation, and transfer of Division Heads, Regional Manager, Overseas Office General Manager, or equivalent positions, including the appointment of management in subsidiaries, in accordance with applicable governance and authority;
3. Conducting performance evaluations for Acting Officials (PJ) and Grade Evaluations for Division Heads, Regional Heads, Overseas Branch Heads, or equivalent positions, including the appointment of management in subsidiaries under the applicable governance framework;
4. Designating Nominated Talent for State-Owned Enterprises (SOEs) Financial Services Cluster;

HUMAN CAPITAL COMMITTEE WORK PLAN FOR 2026

The Human Capital Committee (KHC) has formulated its 2025 work plan, aligned with BNI's Human Capital Roadmap, which includes:

1. Implementation of the Human Capital Strategy & Policy (HSP) Sub-Committee, as part of the initiatives outlined in the 2026 – 2030 Human Capital Long-Term Corporate Plan (RJPP)
2. Implementation of the Executive Talent Sub-Committee (ETC), as part of the initiatives outlined in the 2026 – 2030 Human Capital Long-Term Corporate Plan (RJPP).

SUBSIDIARIES COMMITTEE (KPA)

The Subsidiaries Committee holds a strategic mandate to formulate, establish, and manage policies as well as corporate actions relating to all BNI subsidiaries. In carrying out its role, the Committee ensures that each subsidiary delivers added value, sustainable competitiveness, and long term growth within the BNI Group ecosystem.

SUBSIDIARIES COMMITTEE CHARTER

In fulfilling its functions and responsibilities, all members of the Subsidiaries Committee adhere to the Subsidiaries Committee Charter, which serves as a working guideline. This charter clearly defines the structure, authority, duties and responsibilities, meeting procedures, activities, and operational framework of the Subsidiaries Committee. The Subsidiaries Committee Charter was established by the Board of Directors through Decree No. KP/459/DIR/R dated September 10, 2025, and is periodically reviewed to ensure its alignment with applicable regulations and the Bank's evolving needs. The currently valid Subsidiaries Committee Charter remains relevant to current conditions.

DUTIES AND RESPONSIBILITIES OF THE SUBSIDIARIES COMMITTEE

The duties and responsibilities of the Subsidiaries Committee include:

1. Defining strategies and targets for subsidiaries.
2. Establishing business initiatives for BNI's capital participation in subsidiaries.
3. Approving Corporate Actions and capital participation within BNI Incorporated.
4. Evaluating financial performance of subsidiaries.
5. Setting remuneration policies for subsidiary management.
6. Approving Subsidiaries' Annual Budget and Business Plan (RKAP).
7. Determining the execution and agenda of General Meetings of Shareholders (GMS) for subsidiaries.
8. Appointing Proxies to represent BNI as a Shareholder in subsidiaries.

STRUCTURE AND MEMBERSHIP OF THE SUBSIDIARIES COMMITTEE

The Subsidiaries Committee consists of members from the Board of Directors, along with designated executive officers at one level below the Board of Directors. The committee's membership structure is determined by a Board of Directors Decree, which also serves as the official appointment of the Chairperson, Vice Chairperson, and Committee Members.

Pursuant to Decree No. KP/459/DIR/R dated September 10, 2025 concerning the Reorganization of the Subsidiaries Committee (KPA), the structure, membership, and voting rights status of the Subsidiaries Committee as of December 31, 2025, are as follows:

Position in the Committee	Filled In by	Voting Rights Status
Chairman	President Director	Holds voting rights
Vice Chairman	Finance & Strategy Director	Holds voting rights
Secretary	Subsidiaries Management Division Head (serving as a permanent member)	Holds no voting rights
Permanent Member at the Director & SEVP level	1. Risk Management Director 2. Director of Subsidiary Company Development related to the material to be discussed	Holds voting rights
Permanent Member at the Board of Directors level	Human Capital & Compliance Director*	Holds no voting rights
Non Permanent Member at the Board of Directors level	Director of Division/SEVP/Division Head/Functional Unit Head related to the topic of discussion.	As stipulated in the committee's work guidelines

*) Specifically, Human Capital & Compliance Director has specific duties and responsibilities that are regulated in the committee's work guidelines.

PERIOD AND TERM OF OFFICE OF SUBSIDIARY COMMITTEE

The term of office of the KPA Committee membership is determined following each structural term of office at BNI.

PROFILE OF THE CHAIRMAN AND MEMBERS OF THE SUBSIDIARY COMMITTEE

Information on the profile of the members of the Subsidiary Committee has been described in full in the Company Profile Chapter, Sub-chapter Profile of the Board of Directors, Sub-chapter Profile of the Senior Executive Vice President (SEVP) and Sub-chapter Executive Officers.

SUBSIDIARY COMMITTEE CERTIFICATION

BNI ensures that all personnel of the Subsidiary Committee have met the qualification standards and competency certification in accordance with applicable provisions. In 2025, the Subsidiary Committee has participated in the certification program.

SUBSIDIARY COMMITTEE INDEPENDENCE STATEMENT

In discharging its duties and responsibilities, the Subsidiaries Committee (KPA) upholds the principle of independence. All members of the Committee discharge their roles free from any influence, pressure, or intervention from any party that could otherwise compromise independence in the decision making process.

SUBSIDIARIES COMMITTEE MEETING

Implementation of Subsidiaries Committee Meeting

The policy and procedures for implementing BNI Subsidiary Committee meetings are as follows:

1. The Committee holds meetings at least 4 (four) times in 1 (one) year or according to needs at a certain place, time and date that has been determined so that all members can arrange their attendance time.
2. The Sub-Committee may hold emergency meetings considering the importance of issues that must be decided immediately.
3. The Committee quorum includes the chairperson, vice chairperson, and designated permanent members (voting members) at the Director and SEVP levels. A quorum for a committee meeting is achieved if at least half of the committee's quorum is present, and the Chairperson and/or Vice Chairperson shall also be present.
4. In decision-making, only all voting members, consisting of permanent and non-permanent members of the Committee at the Director and SEVP levels, who are present at the meeting shall have voting rights.

Frequency and Attendance Level

In 2025, BNI held 3 (three) meetings of the KPA Committee attended by the Board of Directors and committee members. More detailed information on the implementation of the KPA Committee Meeting and the level of attendance of committee members in the meeting is described in the following table:

No.	Tanggal Rapat	Agenda Rapat	Kuorum Kehadiran (%)
1	05 Februari 2025	Performance Review Perusahaan Anak Tahun 2024	100% (Fulfilled)
2	02 Juni 2025	Rapat Umum Pemegang Saham (RUPS) Luar Biasa BNI Life	100% (Fulfilled)
3	02 Juni 2025	Usulan Agenda dan Keputusan RUPS Tahunan Tahun Buku 2024 Perusahaan Anak	100% (Fulfilled)
4	22 September 2025	Evaluasi Sistem Pengendalian Intern Terintegrasi Semester I Tahun 2025	100% (Fulfilled)
5	03 November 2025	Usulan Business Plan Perusahaan Anak Tahun 2026	100% (Fulfilled)
6	10 November 2025	Evaluasi Perbaikan Bisnis BNI Finance Tahun 2026	100% (Fulfilled)

TRAINING AND/OR COMPETENCY IMPROVEMENT OF KPA COMMITTEE IN 2025

In 2025, the chair and members of the KPA Committee participated in a number of training activities/seminars/workshops in order to maintain their level of expertise and competence to support the implementation of their daily tasks. Information related to this has been outlined in the Company Profile Chapter, Competency Development Policy sub-chapter in the discussion entitled Senior Executive Vice President (SEVP) Competency Development, as well as in the Corporate Governance Chapter, Board of Directors sub-chapter, in the discussion entitled Training and/or Competency Improvement of Board Members in 2025.

IMPLEMENTATION OF DUTIES OF THE COMMITTEE ON SUBSIDIARY COMPANIES IN 2025

Throughout 2025, the Committee on Subsidiary Companies has carried out its duties in accordance with its established responsibilities.

WORK PLAN OF THE COMMITTEE ON SUBSIDIARY COMPANIES IN 2026

The Subsidiary Companies Committee has established a work plan for 2026 as follows:

1. Proposed Agenda of Annual General Meeting of Shareholders (AGMS) of Subsidiary Companies for Financial Year 2025;
2. Judiciary of Subsidiary Companies for the achievement of 2025;
3. Performance Review of Subsidiary Companies
4. Consultation on Business Plan of Subsidiary Company for 2026;
5. Strategic plan for the development of Subsidiary Companies.

Supporting Organ of the Board of Directors

The Board of Directors has supporting organs that assist it with its executive and management duties and responsibilities of the Bank, including the Corporate Secretary, Investor Relations, Internal Audit Unit, Compliance Division, Enterprise Risk Management Division, and Operational Risk Management Division.

CORPORATE SECRETARY [ACGS D.3.7]

The Corporate Secretary plays a strategic role as the Company's representative and liaison with shareholders, authorities, and all stakeholders. The Corporate Secretary is responsible for managing the Company's material information, organizing General Meetings of Shareholders, assisting the Board of Commissioners and Board of Directors, and preparing periodic and incidental reports as required by regulators. The Corporate Secretary also plays a key role in building the Bank's image and reputation through constructive relationships with the media, the public, and other stakeholders [ACGS D.3.7]

BNI ensures that the Corporate Secretary has the qualifications and competencies to carry out their duties and responsibilities, as well as a commitment to continuous learning and improvement to enhance their expertise.The Corporate Secretary is trained in legal, accounting, or corporate secretarial practices and stays abreast with relevant developments. [ACGS D.3.8]

LEGAL BASIS

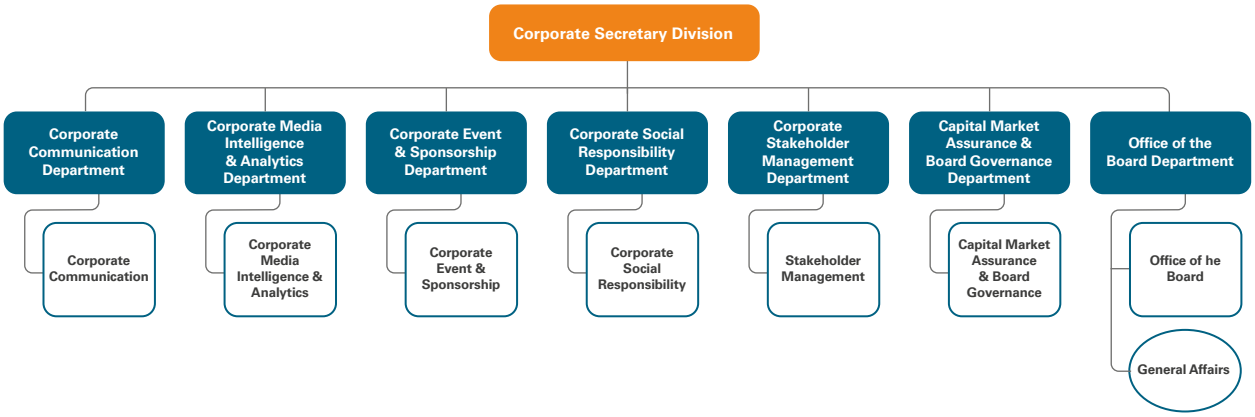
The regulations and legislation that serve as the basis for the establishment, appointment, and implementation of the Corporate Secretary at BNI are as follows:

1. Law No. 19 of 2003 concerning State-Owned Enterprises, as amended several times, most recently by Law No. 16 of 2025 concerning the Fourth Amendment to Law No. 19 of 2003 concerning State-Owned Enterprises
2. Law No. 8 of 1995 concerning Capital Markets, as amended by Law No. 4 of 2023 concerning the Development and Strengthening of the Financial Sector;
3. Minister of State-Owned Enterprises Regulation No. PER-2/MBU/03/2023 regarding Guidelines for Governance and Significant Corporate Activities of State-Owned Enterprises;
4. Financial Services Authority Regulation No. 35/POJK.04/2014 regarding the Corporate Secretary of Issuers or Public Companies ("POJK 35/2014");
5. BNI's Articles of Association.

ORGANIZATIONAL STRUCTURE OF THE CORPORATE SECRETARY

According to the Decree of the Board of Directors No. KP/136/DIR/R dated April 12, 2023, and the Memo of the Corporate Development & Transformation Division No. CDV/2/364/R dated April 27, 2023, the organizational structure, functions, and roles of the Corporate Secretary at BNI are currently carried out by the Head of the Corporate Secretary Division, overseeing the following departments: Corporate Communication Department, Corporate Media Intelligence & Analytics Department, Corporate Event & Sponsorship Department, Corporate Social Responsibility Department, Corporate Stakeholder Management Department, Capital Market Assurance & Board Governance Department, and the Office of the Board Department.

Position of Corporate Secretary in BNI Organizational Structure



Structurally, the BNI Corporate Secretary reports and is directly responsible to the President Director. The Corporate Secretary is appointed and dismissed by the Board of Directors through a Board of Directors decree with the prior written approval of the Board of Commissioners and is notified to the public in accordance with POJK 35/POJK.04/2014 concerning Corporate Secretaries and Public Issuers (POJK 35/2014). [ACGS D.3.7]

DUTIES AND RESPONSIBILITIES OF THE CORPORATE SECRETARY [ACGS D.3.7]

In accordance with the provisions of POJK 35/2014, the Corporate Secretary of BNI bears the following duties and responsibilities:

1. To monitor developments in the Capital Market, particularly the applicable laws and regulations in the Capital Market sector;
2. To advise the Board of Directors and the Board of Commissioners on compliance with applicable laws and regulations in the Capital Market;
3. To assist the Board of Directors and the Board of Commissioners in implementing corporate governance, including:
   a. Transparency of information to the public, including the availability of information on the BNI website;
   b. Timely submission of reports to the Financial Services Authority (OJK);
   c. Organizing and documenting the General Meeting of Shareholders (GMS);
   d. Organizing and documenting meetings of the Board of Directors and/or the Board of Commissioners;
   e. Implementing the company's orientation program for the Board of Directors and/or the Board of Commissioners.
4. To act as a liaison between BNI and its shareholders, the Financial Services Authority, and other stakeholders.
5. To provide information needed by shareholders and stakeholders related to the condition of BNI.
6. To attend Board of Directors meetings, Board of Commissioners meetings, joint meetings of the Board of Directors and Board of Commissioners, and to prepare meeting minutes.
7. To manage the Shareholders Register and Special Shareholders Register.
8. To be responsible for organizing the GMS. To prepare necessary materials related to the reports/routine activities of the Board of Directors to be presented to external parties and to prepare materials for matters requiring the Board of Directors' decisions concerning BNI's management;
9. To organize meetings within the Board of Directors, both routine and non-routine.
10. To conduct activities related to shareholders and stakeholders through analyst meetings, public expos, conference calls, non-deal roadshows, and meetings with shareholders.

In line with POJK 35/2014 and to achieve the vision and mission of the Corporate Secretary, which aligns with BNI's vision and mission, the Corporate Secretary body of BNI has functions and duties outlined in the Company's Guidelines for the Corporate Secretary Division, including the following:

1. **Capital Market Assurance and Board Governance Function**
   To carry out activities related to the Corporate Secretary's role concerning applicable regulations in the capital market, corporate law for BNI, and contract law within the scope of the Corporate Secretary Division. The Corporate Secretary also monitors the implementation of BNI's Good Corporate Governance (GCG) practices (GMS, Board of Directors, and Board of Commissioners) to ensure compliance with regulations and best practices.

2. **Corporate Communication Function**
   To carry out internal and external communication activities, research and development of internal communication tools, publication of internal media, communication media for the Board of Directors, internal communication media in print and electronic forms (BNI website and internal communication portal), and manage media relations.

3. **Corporate Media Intelligence and Analytics Function**
   To carry out corporate media intelligence and analytics activities and manage systems and tools related to follow-up on negative media coverage of BNI Group.

4. **Corporate Event and Sponsorship Function**
   To manage BNI's sponsorship activities comprehensively, including corporate identity, BNI branding, as well as promotional activities, and corporate events.

5. **Corporate Social Responsibility Function**
   To develop strategies for optimizing the implementation, monitoring, evaluation, and realization of the Social and Environmental Responsibility Program (TJSL) and community development.

6. **Corporate Stakeholder Management Function**
   To carry out activities related to institutions and collaborate with relevant agencies to enhance BNI's Corporate Image. The Corporate Secretary also manages activities related to the media, establishing cooperation with mass media and institutions to improve BNI's Corporate Image.

7. **Office of the Board Function**
   To carry out activities related to the smooth execution of the duties of the Board of Commissioners in ensuring the implementation of GCG, supporting the needs of the Board of Directors, and managing secretarial activities, protocol, housekeeping, and general affairs activities.

CORPORATE SECRETARY PROFILE



Okki Rushartomo
Corporate Secretary

Age
45 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
Bachelor of Industrial Engineering from the Bandung Institute of Technology (2002)

Legal Basis for Appointment
Appointed as Corporate Secretary based on the Decree of the Board of Directors No. KP/367/DIR/R dated September 14, 2022, and reconfirmed based on the Decree of the Board of Directors No. KP/208/DIR/R dated May 31, 2023.

Term of Office
September 19, 2022 – Present

Professional Certification and/orTraining [ACGS D.3.8]
Risk Management Competency Level 6 by the Banking Professional Certification Institute (2024)

Work Experience [ACGS D.3.8]
Di BNI
- Assistant Vice President in the Card Business Division at PT Bank Negara Indonesia (Persero) Tbk (2012-2015)
- Vice President of the Card Business Division at PT Bank Negara Indonesia (Persero) Tbk (2015-2018)
- Head of the Card Business Division at PT Bank Negara Indonesia (Persero) Tbk (2018-2020)
- Head of the Marketing Communications Division at PT Bank Negara Indonesia (Persero) Tbk (2020-2022).

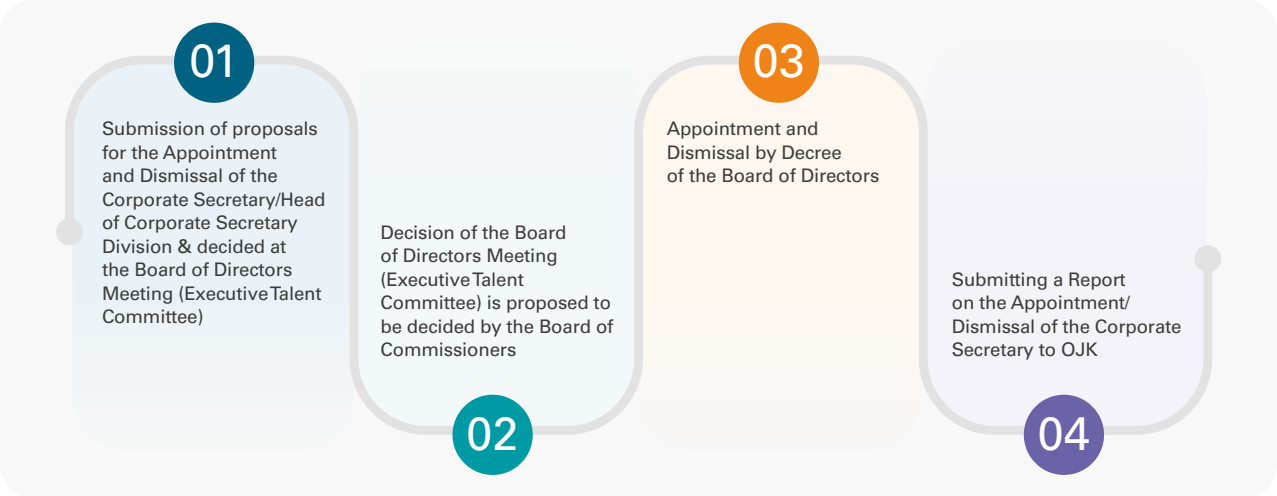
Other Companies
Assistant Vice President at PT Bank HSBC Indonesia (2010-2012)

Affiliated Relationships
Does not have any affiliated relationships with members of the Board of Directors, Board of Commissioners, or Major/Controlling Shareholders.

TENURE OF THE CORPORATE SECRETARY

Mr. Okki Rushartomo effectively assumed the position of Corporate Secretary of BNI based on the Board of Directors Decree No. KP/367/DIR/R dated September 14, 2022, and was reappointed through the Board of Directors Decree No. KP/208/DIR/R dated May 31, 2023. He resides in Jakarta, Indonesia, and continues to serve as the Corporate Secretary of BNI to this day.

PROCESS FOR APPOINTMENT AND DISMISSAL OF CORPORATE SECRETARY



On September 19, 2022, BNI submitted a report on the appointment of Okki Rushartomo as the Corporate Secretary to the OJK (Financial Services Authority), the Indonesia Stock Exchange, and the Ministry of State-Owned Enterprises.

TRAINING AND/OR COMPETENCY DEVELOPMENT OF COMPANY SECRETARY IN 2025

[ACGS D.3.8]

Every year, the Corporate Secretary conducts refresher sessions related to knowledge and competency development to support the implementation of his/her duties. The Corporate Secretary has attended a number of training/seminars/workshops both online and offline throughout 2025, with the following details:

Title of Training	Date of Implementation	Venue	Type of Activity	Organizer
Participation in the National Seminar on Integrating ESG for Sustainable Growth	January 10, 2025	Jakarta	Seminar	Commission VI
BNI Media Networking Night with the Editor-in-Chief	January 13, 2025	Grha BNI Jakarta	Sharing Session	BNI
Certified Sustainability Reporting Specialist (CSRS)	January 21-23, 2025	Bali	Training	TJSL Forum
Strategic Collaboration between State-Owned Enterprises and Stakeholders in Encouraging Corporate Action for National Economic Development	January 24, 2025	Jakarta	FGD	Himbara, BI, and OJK
BNI Sharing Session with SEVP Digital, Director of Human Capital and Editor-in-Chief of National Media	March 10, 2025	Astra Tower Jakarta	Sharing Session	BNI
Nusantara Business Connect	April 8, 2025	London	FGD	BP BUMN
Banking Digitalization Forum Towards Modern Financial Services	April 9, 2025	Surabaya	FGD	Himbara, BI, and OJK
Coaching Skills for Leaders and Managers	April 17, 2025	Online Course	Training	Project Management Institute

Title of Training	Date of Implementation	Venue	Type of Activity	Organizer
Impact-Based Project Managemet for Social Investment Program	April 22-24, 2025	Surabaya	Training	Social Investment Indonesia
Discussion regarding PAD based on POJKK PIKK	May 8, 2025	Online (Zoom Meeting)	Workshop	HIMBARA
Thriving as a Project Manager in the Age of AI	May 9, 2025	Online Course	Training	Project Management Institute
Economic Synergy Forum 2025	May 9, 2025	Tangerang	FGD	Himbara, BI, and OJK
Seminar on the Role of the Banking Industry in Supporting Inclusive and Sustainable Tourism	May 20, 2025	Bali	FGD	Himbara, BI, and OJK
Nusantara Business Connect	May 26, 2025	Tokyo	FGD	BP BUMN
New Corporate Governance Leadership Program	May 27-28, 2025	Pullman Hotel Thamrin	Workshop	IICD
Sapa London Business & Banking in Harmony	June 3, 2025	London	FGD	BP BUMN
Economic Partnership Meeting	July 17, 2025	Jakarta	FGD	Himbara, BI, and OJK
Indonesia Investment Dialogue	July 21, 2025	Seoul	FGD	BP BUMN
Indonesia-Australia Harvesting Future Echoes of Friendship Across Lands	July 24, 2025	Australia	FGD	Himbara, BI, and OJK
Swiss Partnership Meeting	July 31, 2025	Swiss	FGD	Himbara, BI, and OJK
Economic outlook 2025 global and domestic	August 4, 2025	Balikpapan	FGD	
Sydney Business Summit	August 21, 2025	Sydney	FGD	Himbara, BI, and OJK
Media Relation & Reputation Crisis Handling 2025	August 21-22, 2025	BNI University, Jl. Lada No. Pinangsia, Taman Sari, West Jakarta	Workshop	BNI
Anti Bribery Management System Awareness Training (ISO 37001:2016)	September 15, 2025	Online (Zoom Meeting)	Training	BNI (CMP Division)
Himbara dan BSI Economic outlook 2025	September 24, 2025	Semarang	FGD	Himbara, BI, and OJK
BNI Sharing Session with Merchants and the Central Information Commission	September 28, 2025	Novotel Palembang	Sharing Session	BNI
BNI Sharing Session with IBA Palembang Students and the Central Information Commission	September 28, 2025	Universitas IBA Palembang	Sharing Session	BNI
Indonesia International Sustainability Forum (IISF) 2025	September 29, 2025	Jakarta	Workshop	KADIN, Danantara
Financial Digitalization Workshop	October 16, 2025	Kepulauan Seribu	Workshop	Commission XI of the Indonesian House of Representatives
BNI Sharing Session with Chief Economist and Editor-in-Chief	October 24, 2025	Kila Kila, SCBD South Jakarta	Sharing Session	BNI
Bandung Economic Dialogue	October 27, 2025	Bandung	FGD	Himbara, BI, and OJK
2026 People's Economy Discussion Forum	October 31, 2025	Tangerang	FGD	KBUMN
Workshop FH BUMN	November 17-18, 2025	Ashley Wahid Hasyim Hotel	Workshop	FH BUMN
Strategic Corporate Social Responsibility for ESG Excellence	November 20-21, 2025	Purwokerto	Training	Olahkarsa
Two-day national workshop on corporate accountability in corruption crimes in government procurement of goods and services	December 9, 2024	Jakarta	Workshop	KBUMN

REPORT ON THE IMPLEMENTATION OF CORPORATE SECRETARY DUTIES IN 2025

In 2025, the Corporate Secretary prepared the Corporate Secretary Report as mandated in Article 11 of OJK Regulation No. 35/POJK.04/2014, which stipulates that:

1. The Corporate Secretary shall prepare a report periodically, at least once a year, on the implementation of the Corporate Secretary's functions to the Board of Directors, with a copy provided to the Board of Commissioners.
2. Issuers or Public Companies shall disclose a brief description of the Corporate Secretary's functions and information regarding the education and/or training attended by the Corporate Secretary in the issuer's or public company's annual report.

Below is the 2025 Corporate Secretary Report for BNI, which has been submitted to the Board of Directors:

No.	Function According to OJK	Program	Realization
1.	Keeping Abreast with the Developments in the Capital Market	Regarding developments in the Capital Market especially Capital Market laws and regulations	• Providing responses to the Financial Services Authority as the capital market regulator regarding the draft OJK Regulations for 2025. • Participating in training in order to understand developments in the capital market, especially laws and regulations applicable in the capital market sector • Attending socialization and discussions on the implementation of Capital Market provisions and systems
2.	Providing input to the Board of Directors and Board of Commissioners to comply with Capital Market provisions	Providing input to the Board of Directors and Board of Commissioners to comply with Capital Market provisions in every decision-making or policy-making	• Reviewing and providing proposals regarding decisions and/or policies of the Board of Directors and Board of Commissioners and units under the Board of Directors, based on Capital Market provisions • Disseminating changes to Capital Market provisions to the Board of Directors and Board of Commissioners Re-submitting (reminder) Capital Market regulations to the Board of Directors and Board of Commissioners
		Assisting the Board of Directors and Board of Commissioners in implementing BNI Governance, including guaranteeing the rights of shareholders, the functions and roles of the Board of Commissioners, the functions and roles of the Board of Directors, stakeholder participation, information disclosure	• Assisting the Board of Directors in organizing GMS by taking into account Capital Market regulations and best practices. The Annual GMS held on March 26, 2025 was carried out in accordance with applicable provisions, including voting, attended by members of the Board of Directors and Board of Commissioners, publication of minutes of the GMS available on the Company's website • Assisting the Board of Directors in improving the quality of corporate communication with Shareholders or Investors • Assisting the Board of Directors in formulating corporate communication policies with shareholders or investors
			• Assisting the Board of Directors and Board of Commissioners in improving the competence of members of the Board of Directors and Board of Commissioners through training • Preparation of Insider Trading Company Guidelines; • Assisting the Board of Directors and Board of Commissioners in implementing long-term incentives to the Board of Directors and Employees by coordinating with the Human Capital Strategy Division and the Human Capital Services Division • Improving the implementation of information disclosure, namely in addition to the website, the Company uses other media, namely Twitter, Facebook, Instagram, LinkedIn, and YouTube.
3.	Assisting the Board of Directors and Board of Commissioners in the Implementation of BNI Governance	Implementation of orientation programs for the Board of Directors and/or Board of Commissioners of BNI Others related to the implementation of GCG	The Company submits periodic and incidental reports to regulators through reporting delivery media as regulated by each regulator.

No.	Function According to OJK	Program	Realization
4.	Liaison between Issuers and Shareholders of Issuers or Public Companies, Financial Services Authority, and Other Stakeholders	Implementing strategies to improve the quality of BNI's communication with all stakeholders	• Assisting the Board of Directors in organizing Board of Directors Meetings, Board of Commissioners Meetings, and Board of Directors Meetings with the Board of Commissioners periodically in accordance with applicable provisions. • All Minutes of Board of Directors Meetings, Board of Commissioners Meetings and Board of Directors Meetings with the Board of Commissioners have been well documented, in hardcopy and softcopy.
		Implementing strategies to improve the quality of BNI's communication with all stakeholders	Implementing an Orientation Program for the Board of Directors and/or Board of Commissioners with discussions related to: • Vision, mission, organizational structure of the Company, business activities, and operational networks • Annual Report, Company Work Plan and Budget (RKAP) and Bank Business Plan (RBB), Company Code of Ethics, BNI Work Culture, Board of Commissioners Work Procedures Guidelines, Good Corporate Governance Policy, and Company Articles of Association • Good Corporate Governance (concurrent positions, share ownership and independent commissioners); • Duties, authorities and responsibilities of the Board of Commissioners and Board of Directors, delegation of authority and limitations of authority of the Board of Commissioners in carrying out supervisory duties towards the company based on applicable laws and regulations • Committees under the Board of Directors and Board of Commissioners that are formed and directly responsible to the Board of Commissioners, the Secretary of the Board of Commissioners and the Secretariat of the Board of Commissioners that assist in the smooth running of the Board of Commissioners' duties • Remuneration and facilities provided to members of the Board of Directors and Board of Commissioners Together with the Compliance Division, prepare a Self-Assessment Report on the Implementation of GCG in the Company • GCG Commitment/Integrity Pact of the Board of Directors and Board of Commissioners • GCG Socialization • Stock Management • Disclosure of Share Ownership by the Company's Board of Directors and Board of Commissioners • Remuneration of the Board of Directors and Board of Commissioners • Rewards and GCG Assessments from External Parties related to the Corporate Secretary Function

Furthermore, the Corporate Secretary also ensures public transparency by disseminating information through the mass media, the IDX website, and BNI's official website in both Indonesian and English. A more detailed disclosure of this report is outlined in the Sub-Chapter onTransparency of Report Delivery.

Throughout 2025, the Corporate Secretary has submitted reports to the IDX and OJK in a timely manner. Broadly speaking, these reports can be categorized into Periodic Reports and Incidental Reports.

Periodic Reports

The Periodic Reports submitted by BNI's Corporate Secretary to the IDX and/or OJK in 2025 are detailed as follows:

No.	Report Type	Addressed to	Report Period	Number of Reports
1.	Monthly Report of Securities Holder Registration	OJK & IDX	Monthly	12
2.	Consolidated Financial Statements of Bank and Subsidiaries (Unaudited)	OJK & IDX	Quarter	3
3.	Annual Financial Statements (Audited)	OJK & IDX	Annual	1
4.	Annual Report (including the Corporate Governance Report, the Corporate Sharia Business Unit Governance Report, and the Integrated Governance Report of the BNI Financial Conglomerate)	OJK & IDX	Annual	1
5.	Sustainability Report	OJK & IDX	Annual	1
6.	Annual Rating Result Report	OJK & IDX	Annual	1
7.	Annual Report of Parent Entity and Subsidiary Bank (Report of Banks that are part of a business group)	OJK	Annual	1

No.	Report Type	Addressed to	Report Period	Number of Reports
8.	Report of Detailed List of Related Parties	OJK	Semiannual	2
9.	Report of Results of Annual Public Expose Implementation	IDX	Annual	1
10.	Report of List of 10 Largest Shareholders	OJK	Quarter	4
11.	Company Performance Report (Earning Call)	OJK & IDX	Quarter	4
12.	Announcement Report of Annual General Meeting of Shareholders	OJK & IDX	Annual	1
13.	Invitation Report of Annual General Meeting of Shareholders	OJK & IDX	Annual	1
14.	Report of Implementation of Annual General Meeting of Shareholders	OJK & IDX	Annual	1
15.	Report on the Implementation of Cash Dividend Payment	OJK & IDX	Annual	1

Incidental Reports

In addition to submitting mandatory periodic reports, the Corporate Secretary has submitted 51 (fifty-one) Incidental Reports to regulators. These reports are detailed in the Transparency in Report Submission sub-chapter.

Information regarding these Periodic Reports and Incidental Reports has also been published on the BNI website at https://www.bni.co.id/id-id/investor/berita-investor/keterbukaan-informasi.

INVESTOR RELATIONS

In order to maximize the company's market capitalization, BNI established the Investor Relations Division, which is fully tasked and responsible for the execution of the Bank's Investor Relations functions. Investor Relations facilitates engagement with shareholders and the capital market community to provide a realistic and transparent overview of the company's condition.

FUNGSI DAN TUGAS POKOK INVESTOR RELATIONS

BNI's Investor Relations function has been effectively operational since BNI officially became a public company through its Initial Public Offering (IPO) in 1996, originally under the Corporate Secretary Division. Over time, an organizational restructuring led to the separation of the Investor Relations function from the Corporate Secretary function.

Consequently, pursuant to No. KP/289/R dated June 28, 2021 and No. KP/136/R dated April 12, 2023, BNI established a dedicated organization to manage the Investor Relations function. This initiative was undertaken considering the vital role of Investor Relations in managing communication between management and shareholders, aligned with the steadily increasing interest of shareholders in BNI.

In line with the provisions set by BNI, the Investor Relations Division has the following main functions:

1. Manage cooperation with relevant parties in Indonesia's capital market, including fund managers, analysts, stockbrokers, investment bankers, rating agencies, and members of the Indonesian Issuers Association (AEI);
2. Communicate the company's performance and strategy to market analysts and investors to achieve an optimal long-term stock valuation for BNI through analyst meetings, conference calls, roadshows, and related events;
3. Represent BNI's management in meetings with analysts and investors, either one-on-one or through public presentations, to communicate opinions, stances, and reactions to company challenges and/or opportunities and to present strategic follow-up actions for BNI' management;
4. Manage activities related to BNI's performance and ratings;
5. Monitor and analyze developments in BNI's stock performance, the exchange, and peer groups;
6. Manage BNI's performance database, stock information, investor contacts, reports, mailing lists for fund managers, and other relevant parties;
7. Ensure openness, accuracy, and timely disclosure of information to market participants.

Profile of Investor Relations Division Head



Yohan Setio, CFA
Investor Relations Division Head

Age
40 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor's degree in Accounting Economics from the University of Indonesia (2003-2006)
- Master's degree in Business Administration from the University of Cambridge (2011-2012)

Legal Basis for Appointment
Appointed as Head of Investor Relations Division based on Board of Directors Decree No. KP/258/DIR/R dated June 14, 2021, and the unit name was changed to Investor Relations Division Head based on Board of Directors Decree No. KP/229/DIR/R dated June 6, 2023.

Term of Office
2021 – Present

Professional Certification and/or Training
- Banking Risk Management Certification Qualification 5 with Certificate No./BSMR/SKT/7223/X/2024 dated October 7, 2024
- CFA (Chartered Financial Analyst) Certification from CFA Institute (2012)

Work Experience
Di BNI
- Acting Head of the Office of Chief Economist Division (2021-2022)
- Head of Investor Relations Division (2021 - present)

At Other Companies
- Officer - Global Transaction Banking at Deutsche Bank (2006 - 2008)
- AVP - Equity Research Analyst at PT Mandiri Sekuritas (2008 - 2011)
- Associate Director - Institutional Equity Sales at PT Mandiri Sekuritas (2012 - 2016)
- SVP - Head of Investor Relations at PT Bank Mandiri (Persero) Tbk (2016 - 2020)

Concurrent Positions
None

Affiliated Relationships
Does not have any affiliated relationships with members of the Board of Directors, Board of Commissioners, or Major/ Controlling Shareholders

TRAINING AND/OR HUMAN RESOURCE COMPETENCY ENHANCEMENT INVESTOR RELATIONS DIVISION 2025

In 2025, the Investor Relations Division participated in a series of training activities to support its competencies in executing its duties and responsibilities, including:

No	Competency Development / Training Subject	Organizer	Date of Implementation
1	Strategic Competency for BUMN Leadership	Ministry of State-Owned Enterprises (SOE)	April 2025
2	Company Analysis	Bloomberg	June 2025
3	Efficient Excel Analysis & Reporting	Bloomberg	June 2025
4	Risk Management Certification (SMR) Level 5	BNI University (BNU) and LSPP	June 2025
5	Money Market 101	Bloomberg	September 2025
6	Investor Relations 101	Bloomberg	September 2025
7	Equity Analysis	Bloomberg	September 2025
8	Valuation on Merger & Acquisition	PPM Manajemen	December 2025
9	Understanding Financial Statement	PPM Manajemen	December 2025

2025 INVESTOR RELATIONS DIVISION ACTIVITY REPORT

Throughout 2025, the Investor Relations Division effectively and efficiently performed its core functions, particularly in delivering accurate and timely information regarding the company's performance, business prospects, and other pertinent details required by investors, potential investors, analysts, the financial community, and the capital markets to support informed decision-making. Investor relations activities have been conducted in adherence to confidentiality principles and with equal treatment for all investors. Internally, the Investor Relations Division has also worked to enhance communication with various divisions to strengthen alignment between BNI's strategies and the concerns of investors, thus improving the overall performance of the bank.

In line with its primary functions, the Investor Relations Division has also intensified monitoring of BNI's stock performance and the prevailing market sentiment, while optimizing the corporate rating review activities to ensure that BNI's rating remains within the investment-grade category. The division has been actively involved in enhancing the frequency and quality of information regarding the implementation of ESG (Environmental, Social, and Governance) aspects to investors, as well as participating in the ESG Rating Review and conveying emerging ESG-related issues in the market to the relevant divisions.

Throughout 2025, BNI has conducted analyst meetings and public expos to present its annual performance results. BNI has also actively participated in various conferences, both online and offline, as well as non-deal roadshows organized by securities firms or brokers, to improve the quality of its investor base by increasing the number of top tier global institutional investors with a long-term investment horizon. These activities have facilitated interactions between BNI and domestic as well as international investors or potential investors. In 2025, the Investor Relations Division conducted a total of 335 meetings, comprising 16 Conferences & Non-Deal Roadshows, 4 Earnings Calls, as well as other agendas including Public Exposes, Retail Webinars/Seminars, Regular Meetings, and Annual Rating Review Meetings. In every investor engagement, we consistently communicate BNI's strategies, including our adaptation to dynamic and volatile market conditions, to ensure the provision of transparent information. This is aligned with our focus on enhancing the quality of engagement, investor confidence, and investor interest.

Beyond focusing on institutional investors, BNI consistently maintains close relationships with retail investors. By leveraging social media and collaborating with brokers who possess an extensive retail investor base, the Investor Relations Division proactively provides the latest updates regarding the company's developments. This approach not only enhances communication accessibility but also broadens retail investors' understanding of BNI's future strategic direction.

The following table provides a detailed breakdown of BNI's Investor Relations activities over the past two years:

Statistik Kegiatan Investor Relations BNI tahun 2025 dan 2024

Investor Relations Activity	2025	2024
Earnings Call (Analyst Meeting) [ACGS C.7.3]	4	4
Public Exposes (Including Public Expose from IDX)	3	5
Non-Deal Roadshow & Conference Calls	16	21
Retail Investor Webinar/Seminar	3	7
Regular Meeting with Investors	306	353
Annual Rating Review Meetings	3	3
Total	**335**	**393**

ACTIVITIES INVOLVING EXISTING SHAREHOLDERS [ACGS A.4.1]

Throughout 2025, Investor Relations also conducted activities involving all shareholders, including institutional shareholders. In detail, BNI has invited investors to, as well as participated in, the following activities:

Activity	Date of Implementation	Place of Implementation	Event Description	Event Mechanism
JP Morgan Asia Conference	January 9, 2025	Singapore	Investor Conference hosted by JP Morgan	Offline
2025 ASEAN Conference	January 10, 2025	Singapore	Investor Conference hosted by Bank of America	Offline
Earnings Call FY2024	January 22, 2025	Jakarta	FY2024 Earnings Performance Presentation	Offline
Non-Deal Roadshow	March 3-4, 2025	Hong Kong	Non-Deal Roadshow in collaboration with CLSA	Offline
MNC Sekuritas Investor Gathering 2025	March 20, 2025	Jakarta	Retail Investor Update	Hybrid
Earnings Call 1Q2025	April 28, 2025	Jakarta	1Q 2025 Earnings Performance Presentation	Online
Non-Deal Roadshow	May 7–8, 2025	Kuala Lumpur	Non-Deal Roadshow in collaboration with BNI Sekuritas	Offline
UBS Asian Investment Conference 2025	May 27, 2025	Hong Kong	Investor Conference hosted by UBS	Offline
JP Morgan Asia Pacific All Star Forum	June 3–4, 2025	New York	Investor Conference hosted by JP Morgan	Offline
Non-Deal Roadshow	June 6–16, 2025	Paris	Non-Deal Roadshow in collaboration with Macquarie	Offline
Asia Unbound - Road to Recovery Conference	June 18–19, 2025	London	Investor Conference hosted by Macquarie	Offline
Earnings Call 1H2025	July 25, 2025	Jakarta	1H2025 Earnings Performance Presentation	Online
Non-Deal Roadshow	July 30–31, 2025	Singapura	Non-Deal Roadshow in collaboration with BNI Sekuritas	Offline
Noan-Deal Roadshow	August 14–15, 2025	Bangkok	Non-Deal Roadshow in collaboration with CLSA	Offline
32nd Investors' Forum 2025	September 10–11, 2025	Hong Kong	Investor Conference hosted by CLSA	Offline
Earnings Call 3Q2025	October 24, 2025	Jakarta	3Q2025 Earnings Performance Presentation	Offline
Non-Deal Roadshow	November 3–11, 2025	Europe	Non-Deal Roadshow in collaboration with UBS	Offline
Twenty-Fourth Annual Asia Pacific Summit	November 19–20, 2025	Singapore	Investor Conference hosted by Morgan Stanley	Offline
Non-Deal Roadshow	November 25–28, 2025	Tokyo	Non-Deal Roadshow in collaboration with MUFG & Bahana Sekuritas	Offline
Non-Deal Roadshow	December 2–4, 2025	New York	Non-Deal Roadshow in collaboration with Macquarie	Offline
Asia Conference 2025	December 9–10, 2025	New York	Investor Conference hosted by Macquarie	Offline

All of the above activities were attended by BNI's existing shareholders.

INVESTOR RELATIONS CONTACTS [ACGS C.10.1]

BNI Investor Relations can be contacted via:
Investor Relations
Phone: +6221-572-8308.
Address: Grha BNI 21st Floor, Jl. Jenderal Sudirman Kav 1 Jakarta.

INTERNAL AUDIT UNIT [ACGS: D.3.14]

In order to ensure the sound conduct of banking operations that is supported by a strong control environment, BNI has established the Internal Audit Division as one of its internal control functions reporting directly to the President Director. The Internal Audit Division acts as a strategic partner to management by performing the role of a Risk Assurance Unit within the Third Line Model under the Internal Control System framework. Beyond its oversight function, the Internal Audit Division actively collaborates with other work units to help create value aligns well with the interests of all stakeholders.

The implementation of BNI's internal audit function encompasses independent and objective assurance and advisory activities aimed at enhancing the Bank's value while improving operational effectiveness. The Internal Audit Division systematically evaluates and strengthens risk management, internal control, and governance processes, thereby supporting the achievement of more resilient and sustainable banking operations.

In carrying out its duties and responsibilities, BNI's Internal Audit Division is granted full, unrestricted, and independent access to records, information, personnel, funds, assets, locations or areas, and other resources of BNI that are relevant to the performance of assurance and advisory activities. Such access is exercised responsibly, with due regard for maintaining the confidentiality of all information obtained. As part of its monitoring activities, the Internal Audit Division regularly assesses the adequacy and effectiveness of risk management, the quality of internal controls, and prevailing governance practices.These assessments are conducted using a risk based audit approach, namely an audit methodology that focuses on the Bank's key risks as the basis for audit planning and execution. This approach enables the Internal Audit Division to allocate resources more efficiently while identifying potential issues that may affect the achievement of organizational objectives. In addition to its assurance role, the Internal Audit Division also provides advisory services, both formally and informally, including independent reviews of the launch of new products or activities in accordance with OJK and BI regulations, as well as special assignments undertaken at the request of management or based on internal initiatives.

Legal Basis and Guidelines for Internal Audit Implementation

The implementation of all Internal Audit activities carried out within the scope of BNI is guided by a number of regulations, including:

1. POJK No. 1/POJK.03/2019 dated January 28, 2019, regarding the Implementation of Internal Audit Functions in Commercial Banks;
2. POJK No. 11/POJK.03/2022 dated July 6, 2022, regarding the Organization of Information Technology by Commercial Banks;
3. SEOJK No. 21/SEOJK.03/2017 dated June 6, 2022, regarding the Application of Risk Management in the Use of Information Technology by Commercial Banks;
4. Financial Services Authority Regulation Number 30 of 2024 concerning Financial Conglomerates & Financial Conglomerate Parent Companies.

In addition to the regulations mentioned above, the implementation of BNI's internal audit function also refers to the standards issued by The Institute of Internal Auditors, namely the International Professional Practices Framework (IPPF) 2017 and the Global Internal Audit Standards (GIAS) 2024.

Internal Audit Charter

In carrying out its duties and authorities, the Internal Audit function adheres to the ethical standards and code of conduct set out in BNI's Internal Audit Charter, which is aligned with the regulations of the Financial Services Authority No. 1/POJK.03/2019 and applicable professional auditing standards. The Internal Audit Charter is reviewed and updated on a regular basis in accordance with the Bank's needs and regulatory developments, with the most recent update completed and approved on August 9, 2024.

The Audit Charter is established as a formal document that sets out the foundation, objectives, position, functions, scope of work, authorities, and working relationships of the Internal Audit function with relevant parties within the organization.Through this charter, the Internal Audit function is expected to operate optimally in providing independent and objective assurance and advisory services, with a clear focus on enhancing the Bank's overall value.

Duties and Responsibilities of the Internal Audit Unit

As stipulated in the BNI Internal Audit Charter, the scope of the Internal Audit assignment is as follows:

1. Assisting the President Director and the Board of Commissioners in conducting supervision by describing the planning, implementation and monitoring of audit results in operational terms;

2. Examining and assessing the efficiency and effectiveness of finance, accounting, operations, human resources, marketing, information technology and other activities through audits;
3. Identifying all possibilities to improve and increase the efficiency of the use of resources and funds used;
4. Providing recommendations for improvements and objective information on the examination results in the form of an Audit Report and submit the report to the President Director and the Board of Commissioners with copies to the Audit Committee and the Director in charge of the Compliance function;
5. Providing advisory services to BNI internally to add value and improve the quality of control, risk management, and corporate governance as long as it does not affect the independence and objectivity of the IAU, and adequate resources are available;
6. Carrying out follow-up monitoring of audit results as well as periodically submit a Pending Follow-up Report on Audit Results to the President Director and the Board of Commissioners with copies to the Audit Committee, as well as the Director in charge of the Compliance function;
7. Conducting an in-depth audit at the request of the Board of Directors and/or Commissioners, or as a follow-up to the general audit results of an object or event that is suspected to contain indications of violation and/or fraud if necessary; and
8. Internal Audit works closely with work units that perform other internal control functions.

Duties and Responsibilities of the Head of Internal Audit Unit

As stipulated in the BNI Internal Audit Charter, the scope of the Internal Audit assignment is as follows:

1. Ensuring the internal audit function is in accordance with the Internal Audit Function in Commercial Banks and the Internal Audit Code of Ethics;
2. Allocating audit resources, determining the objectives, scope, and audit plans or schedules and techniques;
3. Determining strategies, methodologies, tools, audit approaches as well as implementation of quality control in carrying out predetermined main tasks, including subsidiaries/affiliates/financial service institutions owned by BNI, relating to the implementation of audits and consultations;
4. Ensuring that IAD Auditors follow continuous professional development and adequate training in their fields in order to keep abreast of company developments;
5. Preparing and reviewing the internal audit charter periodically;
6. Preparing the Annual Audit Plan and Annual Consultation together with the President Director and Board of Commissioners approved budget allocation by considering the Audit Committee recommendations and monitoring its implementation;
7. Reporting significant audit findings to the President Director and the Director overseeing the compliance function to ensure prompt corrective actions are taken, while actively monitoring the follow-up process;
8. Providing periodic reports on the monitoring of audit follow-up actions to the President Director and the Board of Commissioners, with copies submitted to the Audit Committee and the Director responsible for the compliance function, and;
9. Ensuring the use of external party for internal audit activities:
   a. Facilitate the transfer of knowledge from external parties to members of the Internal Audit Division (SKAI), with consideration given to the temporary nature of external expert services.
   b. Does not affect the independence and objectivity of the Internal Audit function.
   c. The use of external services is in accordance with the BNI Internal Audit Charter.

Authority of the Internal Audit Unit

In order to the duties and responsibilities can run with optimal results, the Internal Audit Unit is given the authority to:

1. Have full, free and unlimited access to BNI records, information, employees, funds, assets, locations/areas, and other resources, including BNI's subsidiaries/affiliates/financial service institutions, relating to the implementation of audits and consultation;
2. Conduct verification, interviews, confirmations, and other audit techniques with customers or other parties related to the implementation of audits and consultations;
3. Communicate directly with the Board of Directors, the Board of Commissioners and Audit Committee;
4. Conduct regular and incidental meetings with the Board of Directors, the Board of Commissioners and the Audit Committee;
5. Attend strategic meetings;
6. Request assistance from other work units or use the services of external parties in conducting audits if deemed necessary; and
7. Coordinate and build synergistic relationships with other assurance units/functions (Compliance

Unit, Risk Management, Senior Operation Risk Executive, Anti-Fraud Unit, and SKAI Subsidiary Companies) to obtain comprehensive and optimal audit results.

Audit Quality Control

To ensure that audit activities are conducted in accordance with applicable ethical standards and best practices, BNI implements a Quality Assurance and Improvement Program (QAIP). This program includes, among others, the development of audit methodologies and continuous enhancement of audit practices. QAIP is carried out through assessments or reviews conducted by both external and internal parties.

External assessments are required to be performed at least once every three years, as stipulated in Financial Services Authority Regulation No. 1/POJK.03/2019. BNI conducted its most recent external assessment in 2024, performed by PT RSM Konsultan Indonesia. The results concluded that BNI's Internal Audit activities were generally in compliance with OJK Regulation No. 1/POJK.03/2019, No. 11/POJK.03/2022, No. 38/POJK.03/2016, No. 21/SEOJK.03/2017, as well as the International Standards for the Professional Practice of Internal Auditing (IPPF) 2017.

Internal assessments, or self-assessments, are conducted on an annual basis. The results indicate that the implementation of the Internal Audit function falls under the "Generally Conforms" category, in accordance with OJK Regulation No. 1/POJK.03/2019, the International Standards for the Professional Practice of Internal Auditing (IPPF) 2017, and the Global Internal Audit Standards (GIAS) 2024.

Audit Methodology

In carrying out its duties, Internal Audit prepares a comprehensive annual audit plan using a Risk Based Audit (RBA) approach. This methodology focuses on identifying and assessing key risks that may affect the achievement of the organization's objectives. Through the implementation of RBA, all stages of audit activities, from planning and execution to audit reporting, are conducted based on risk priorities that have been determined in coordination with operational management, including through risk assessments.

This approach ensures that significant risks are managed effectively and remain within management's acceptable risk tolerance, enabling the Bank to maintain operational stability while ensuring that potential obstacles do not hinder the achievement of the Bank's strategic objective.

The following are the stages of the Risk Based Audit methodology implemented by BNI:

1. Preparation of the Audit and Consulting Plan (RAT), based on a risk based audit approach through Macro and Micro Assessments, as follows:
   a. Macro Assessment is an assessment based on BNI's performance indicators and activity risks, referring to the Corporate Plan, Board of Directors' General Policy (KUD), Bank Business Plan (RBB 2024–2026), BNI Risk Profile, input and or directions from the Board of Directors and Senior Management, as well as prevailing conditions and issues in line with business developments, including the results of external and internal audits and fraud incidents.

      The Macro Assessment aims to identify critical issues in order to determine themes or activities that will become the focus of audit, with an orientation toward business process improvement.
   b. Micro Assessment is the process of determining audit objects (critical units) based on unit level risk assessments.
   c. In addition to the Macro and Micro Assessments, BNI Internal Audit also conducts regulatory assessments to ensure that areas or activities required by regulations are subject to internal review by Internal Audit.

2. Audit execution, conducted to ensure the adequacy and effectiveness of the Bank's governance, risk management, and internal control, supported by the application of an audit rating methodology for risk management and internal control. The rating scale applied consists of satisfactory, good, needs improvement, and unsatisfactory, along with rating components covering both credit activities and non-credit or operational activities. The audit rating mechanism is generated systematically through the Audit Monitoring System (FAST), based on the significance level of each finding (low, medium, high, and critical).

   In addition to risk based audits, Internal Audit also conducts mandatory audits (regulatory based audits) to fulfill external or regulatory requirements.

3. Audit reporting, which includes Audit Reports on the implementation of all audit activities and the Summary of Audit Results (PPHA), which are reported on a quarterly basis to the President Director, the Board of Commissioners, the Audit Committee, and the Financial Services Authority (OJK).

Internal Audit Information System

In line with the increasingly dynamic development of information technology and its impact on the working environment, IAD continues to innovate both in methodology and in the use of tools to strengthen the effectiveness of assurance and advisory activities. One concrete manifestation of this innovation is the implementation of an internally developed Audit Management System (AMS). This application is an integrated digital system that manages the entire audit process on an end to end basis, covering risk assessment, planning, execution, reporting, and monitoring of follow up actions on audit recommendations. The use of AMS ensures that audit processes are conducted in a more systematic, effective, and efficient manner, while also mitigating potential conflicts of interest, thereby enhancing the maturity and reliability of BNI's internal control environment.

Independence, Objectivity, & Cooling-Off Period Policy

Internal auditors are required to remain free from any form of intervention, influence, or personal interest that may compromise their professionalism in delivering objective assessments. One of the measures implemented to safeguard and strengthen independence is BNI's Cooling Off Period policy, which stipulates a defined waiting period before an internal auditor may be reassigned to a work unit that he or she has previously audited. The following are several key provisions that must be observed by IAD:

1. Head of Internal Audit and Auditors are prohibited from:
   a. Holding authority or responsibility for, or participating in, operational activities of BNI or its subsidiaries, affiliates, or financial service institutions owned by BNI.
   b. Simultaneously performing operational tasks or hold positions within the bank, subsidiaries, affiliates, or financial service institutions owned by BNI.
   c. Initiating or approving accounting transactions, except for internal transactions.
   d. Engaging in decision-making processes regarding BNI's operational activities.
2. Internal Audit must establish provisions governing the execution of audit assignments to ensure objectivity and prevent conflicts of interest involving auditors and Internal Audit leadership with respect to the audited entity. Among these provisions is the implementation of a cooling-off period policy.

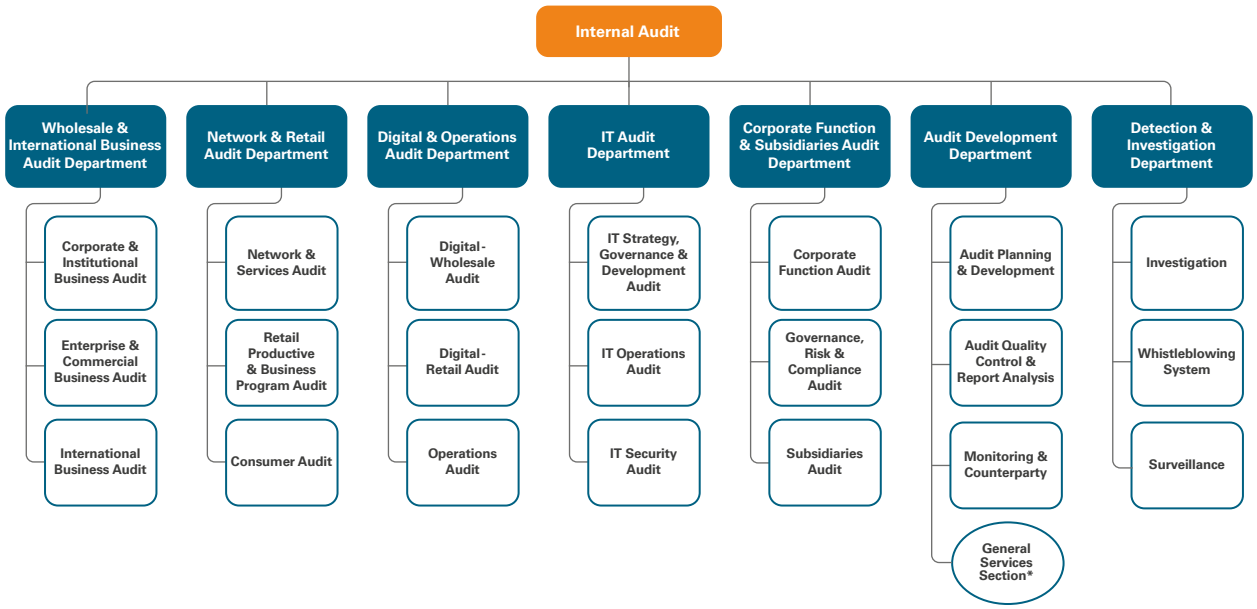
   In this regard, auditors are excluded from audit assignments involving a particular entity or auditee under the following circumstances:
   a. There are employees in the auditee unit who have familial relationships with the internal auditor up to the second degree, whether horizontal or vertical;
   b. An internal auditor has previously served as an employee in the auditee unit, either in a leadership or non-leadership role. Such auditors may be assigned to audit the unit provided that an audit of the said auditee unit has been conducted at least once and/or after a minimum period of one year has elapsed;
   c. Internal auditors are not permitted to audit the same auditee consecutively as team leader for two assignments
   d. Internal auditors are not allowed to audit an object where they were previously involved in providing consultancy services or other assignments related to that object.
3. The Head of Internal Audit holds the authority to determine the resources and budget necessary to perform duties and functions in accordance with the annual audit plan.
4. Internal auditors are required to disclose any information or circumstances that may impair their independence and objectivity in carrying out audit and consultancy assignments to the Head of Internal Audit.
5. The execution and reporting processes of audit and consultancy activities are subject to review by both internal and external parties.
6. BNI ensures that every member of the Internal Audit Unit meets the independence criteria stipulated by applicable regulations. This independence is upheld through specifically designed audit procedures that prevent conflicts of interest, enabling the audit process to be conducted objectively and transparently. The Internal Audit Unit operates independently from the work units and activities it audits, allowing it to provide professional and objective opinions to the President Director regarding the Bank's business and operational activities. By maintaining these independence standards, the Internal Audit Unit can deliver accurate assessments and support the implementation of Good Corporate Governance (GCG) practices across all of BNI's operational activities.

Structure and Position of the Internal Audit Unit

Within BNI's organizational structure, the IAD reports directly to the President Director, with a direct communication line (dotted line) to the Board of Commissioners. In carrying out its duties, IAD may communicate directly and hold meetings with the Board of Directors, the Board of Commissioners, and the Audit Committee, thereby ensuring that audit assignments are conducted effectively and smoothly. The composition of IAD as of December 31, 2025 was established pursuant to the Board of

Directors Decree No. KP/377/DIR/R dated August 1, 2025. The Internal Audit organizational structure has been aligned with the Bank's business segmentation framework in order to strengthen its role in safeguarding business activities through an integrated, value adding, risk based audit approach.

The organizational structure of the Internal Audit Unit as of December 31, 2025, is outlined in the following chart:



*) Mengikuti kebijakan sentralisasi terbatas Bagian Umum Kantor Pusat

Authority for Appointment and Dismissal of the Head of the Internal Audit Unit [ACGS D.3.16]

The Head of Internal Audit is appointed and dismissed by the President Director, subject to approval from the Board of Commissioners, taking into account the recommendations of the Audit Committee. The appointment or dismissal must be reported to the Financial Services Authority (OJK) in person no later than ten (10) working days after the date of the appointment or dismissal.

The President Director may dismiss the Head of Internal Audit, with the approval of the Board of Commissioners and based on the recommendations of the Audit Committee, if the individual fails to meet the requirements to lead BNI's internal audit function as stipulated by applicable regulations and/or is deemed incapable or ineffective in performing their duties.

Head of Internal Audit Unit Profile [ACGS D.3.15]

Internal Audit is headed by Hedmon Yusfid, effective as of August 28, 2025, pursuant to the Appointment Letter of Hedmon Yusfid as Head of Internal Audit of BNI No. SDK/68 dated September 24, 2025, which has been duly reported to the Financial Services Authority (OJK). The brief profile of the Head of Internal Audit of BNI is as follows:



Hedmon Yusfid
Head of Internal Audit Unit

Age
52 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor of Accounting from Andalas University;
- Master of Management and Business from Bogor Agricultural University

Legal Basis of Appointment
Board of Directors Decree No. KP/147/DIR/R dated August 28, 2025.

Term of Office
August 28, 2025 – present.

Professional Certification and/or Training
1. Indonesia Internal Audit Practitioner Certification (IIAP).
2. Certified Bank Auditor Certification (BNI).
3. Risk Management Competency Certification Level 6 (BNI).
4. Digital Forensics in Internal Audit From Data to Evidence, Indonesia Institute of Internal Auditors (IIA).
5. Digital Forensics in Internal Audit From Data to Evidence, BPKP.
6. Auditor Training on Corruption Crimes and Banking Crimes (BNI).
7. Leadership Development Program Middle Management – LDP Top 1000 (BNI);
8. Internal Control Over Financial Reporting/ICoFR (BNI);
9. Agile Audit (BNI);
10. General Management Program (BNI);
11. ACIIA Regional Conference 2024 (IIA).

Work Experience
At BNI
1. Head of Corporate Business Audit Group (2013 – 2014)
2. Head of Planning & Development Group (2015 – 2016);
3. Head of Audit Quality Control Group (2017 – 2018);
4. Regional Audit Group Leader (2019 – 2020);
5. Head of Audit Area 1 Group (2021)5.
6. Head of Audit Area 2 (2022 – July 2023);
7. Head of Wholesale & International Business Audit Department (August 2023 – July 2025)
8. Head of Internal Audit Unit (August 2025 – present)

Concurrent Position
Does not hold concurrent positions both internally and externally BNI.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders.

Internal Audit Human Resources Composition

In performing its functions, the Internal Audit Division of BNI is supported by competent human resources with high integrity and adequate qualifications. As of December 31, 2025, Internal Audit had a total of 178 employees, including the Head of Internal Audit. All personnel are selected through a rigorous process that takes into account diversity aspects, including professional background, areas of expertise, and possession of professional certifications relevant to the internal audit function.

The presence of professionals with diverse competencies reflects BNI's commitment to building a technically robust internal audit team, further strengthened by continuous competency development programs. The composition of Internal Audit human resources as of December 31, 2025 is presented below:

Position	Number (Person)
Internal Audit Head	1
Department Head	6
Lead Auditor	16
AVP Unit Supporting Audit	5
Senior Auditor	33
MGR Unit Supporting Audit	9
MGR BUM	1
Auditor	78
AMGR Unit Supporting Audit	6
Administrative Assistant	4
Surveillance	8
Whistleblowing	3
Retirement Preparation Period (MPP)	4
Total	175
Total	**175**

Internal Auditor Certification

In striving for the continuous professional development of auditors, Internal Audit is committed to consistently enhancing the competence and knowledge of auditors who proactively participate in various development programs and competency improvement activities. These include certified educational programs, both national and international, as well as relevant training, seminars, and workshops that support audit performance. This ongoing initiative is carried out consistently to ensure that the unit meets adequate qualifications as an independent and objective work unit.

The certifications that IAD employees have obtained during 2025 are as follows:

International Professional Certification	Realization in 2025
Indonesia Internal Audit Practitioner (IIAP)	1
Certified Information System Auditor (CISA)	3
Certified Data Science for Manager (CDSM)	7
Certified Information Technology Auditor (CITA)	43

National Professional Certification	Realization in 2025
ISO 27001: 2022	7
Risk Management Certification JK 6	1
Certified Bank of Internal Audit - Auditor	6
Certified Bank of Internal Audit - Supervisor	28
Compliance JK 5	8

Code of Ethics for Internal Auditors

In carrying out their duties and responsibilities, Internal Audit must act professionally and uphold the established code of ethics, which must be adhered to by all auditors, as follows:

1. Integrity
   a. Perform duties honestly, diligently, and responsibly;
   b. Comply with laws and make disclosures in accordance with applicable regulations and professional standards;
   c. Not intentionally or knowingly engage in prohibited or illegal activities, nor take actions that may damage the credibility of Internal Audit and the profession of Internal Auditors; and
   d. Support the goals of BNI and Internal Audit.

2. Objectivity
   a. Not engage in activities or have relationships that may create a conflict of interest;
   b. Not accept anything that could or is perceived to affect professional judgment;
   c. Always exercise professional judgment in the performance of duties in any situation or condition; and
   d. Disclose all known facts.

3. Confidentiality
   a. Be cautious in using and safeguarding information obtained during the performance of duties; and
   b. Not use information for anyone's benefit and/or in any way that would violate the law and/or company regulations.

4. Competence
   a. Perform duties in accordance with the knowledge, skills, and experience possessed;
   b. Conduct audits in accordance with the Application of Internal Audit Functions in Commercial Banks and/or other applicable audit standards; and
   c. Continuously improve competence.

Internal Audit Meetings with the Board of Commissioners, the Board of Directors, and Audit Committee

Meeting Policy

The Internal Audit Charter stipulates that IAD has the authority to communicate directly and hold meetings, both regularly and incidentally, with the Board of Directors, Board of Commissioners, and the Audit Committee. This is done to support the effective and smooth execution of duties. These meetings are part of the authority of the Internal Audit Unit to ensure the effectiveness of assignments.

Meeting Agenda

In 2025, 103 (one hundred and three) Board of Commissioners and Board of Directors meetings were held involving Internal Audit, discussing various agendas as outlined in the following table:

No.	Meeting Date	Meeting Agenda	Participants
1	January 7, 2025	Steering Committee on Personal Data Protection Law and IT Hygiene	Board of Directors
2	January 9, 2025	Joint Meeting Agenda 2 Discussion on Request for Approval of Risk Management Policy Review	Board of Directors, Board of Commissioners
3	January 9, 2025	Joint Meeting Agenda 3 Discussion on Supervisory Report of DPLK BNI Business Plan Realization for Semester II of 2024	Board of Directors, Board of Commissioners
4	January 9, 2025	Joint Meeting Agenda 4 Discussion on Review and Approval of the Renewal of AML, CFT, and CPP of WMD Policies and Procedures of DPLK BNI	Board of Directors, Board of Commissioners
5	January 14, 2025	Board of Directors Clearance Meeting with the Public Accounting Firm	Board of Directors, Audit Committee
6	January 16, 2025	Focus Group Discussion Board of Directors minus One Human Capital Roadmap 2025 to 2029	Board of Directors
7	January 16, 2025	Joint Meeting Agenda 1 Clearance Meeting of the Board of Commissioners with the Public Accounting Firm	Board of Commissioners
9	January 16, 2025	Joint Meeting Agenda 2 Discussion on BNI Performance, Subsidiaries Performance, and Q4 2024 Business Plan Realization	Board of Commissioners
10	January 16, 2025	Joint Meeting Agenda 3 Discussion on Self-Assessment of BNI Soundness Level and Risk Profile as of December 31, 2024	Board of Commissioners
11	January 17, 2025	Anti Fraud Committee Meeting 2025	Board of Directors, SEVP
12	January 23, 2025	Audit Committee Invitation on Key Audit Findings	Audit Committee
13	January 24, 2025	Integrated Risk Management Committee Meeting 01 of 2025	Board of Directors
14	February 4, 2025	Meeting with Director of TOP regarding Debtor Confirmation	Board of Directors
15	February 4, 2025	Follow up on Integrated Risk Management Committee Concerns related to BNI Finance	Board of Directors
16	February 6, 2025	Meeting with SCR regarding Debtor Confirmation	Board of Directors
17	February 13, 2025	Board of Directors Meeting Agenda 2 Finalization of PMS Score 2024	Board of Directors
18	February 14, 2025	Meeting with Vice President Director and External Parties	Board of Directors
19	February 27, 2025	Joint Meeting Agenda 1 Discussion on Debtor Follow Up	Board of Commissioners
20	March 5, 2025	Meeting with President Director at BNI Mataram Branch	Board of Directors
21	March 10, 2025	Board of Directors Meeting Agenda 2 Approval of IT Strategic Plan of SOEs 2025 to 2029	Board of Directors
22	March 10, 2025	Board of Directors Meeting Agenda 4 ALCO and Financial Forecast March 2025	Board of Directors
23	March 18, 2025	Integrated Governance Committee Meeting Evaluation of Integrated Internal Control System and Integrated Internal Audit Effectiveness Semester II 2024	Board of Directors
24	March 18, 2025	OJK Preliminary Examination 2025 Corporate Credit Process and Watchlist Determination	Board of Directors
25	March 19, 2025	OJK Preliminary Examination 2025 Implementation of AML, CFT, and CPP of WMD Program	Board of Directors

No.	Meeting Date	Meeting Agenda	Participants
26	March 20, 2025	OJK Preliminary Examination 2025 Examination Plan for Overseas Branches in Tokyo and Osaka	Board of Directors
27	March 20, 2025	Discussion on Follow Up of the Board of Commissioners Recommendations on Credit Write Off Realization for 2024	Board of Directors, Board of Commissioners
28	April 11, 2025	Meeting with Director of Finance regarding BNI Finance	Board of Directors
29	April 25, 2025	Joint Meeting Agenda 3 Discussion on BNI Risk Profile as of March 31, 2025	Board of Directors, Board of Commissioners
30	April 25, 2025	Preparation for Fit and Proper Test of Board of Directors Members	Board of Directors
31	April 30, 2025	Preparation for Fit and Proper Test of Board of Commissioners Credit Aspects	Board of Directors
32	May 2, 2025	Preparation for Fit and Proper Test of Board of Commissioners Credit Aspects	Board of Commissioners
33	May 14, 2025	Audit Committee Agenda Discussion on Audit Results of Single Customer View Management	Board of Commissioners
34	May 20, 2025	Discussion between Independent Committee Members and Audit Committee with IAD regarding Preparation for Joint Meeting Materials	Independent Committee
35	May 22, 2025	Discussion on Key Audit Findings and Follow Up of Audit Results for 2024 and Q1 2025	Board of Commissioners
36	June 2, 2025	External Audit Entry Meeting	Board of Directors
37	June 3, 2025	Joint Meeting Agenda 1 Discussion on Subsidiaries Financial Performance and Risk Issues Q1 2025	Board of Commissioners
38	June 4, 2025	ALCO Board of Directors Meeting June 2025	Board of Directors
39	June 5, 2025	Joint Meeting Agenda 1 Discussion on BNI Performance as of April 30, 2025	Board of Commissioners
40	June 19, 2025	KPK Invitation Workshop and Relaunch of SOE Internal Control Training Program	Board of Directors
41	June 19, 2025	Joint Meeting Agenda 2 Discussion on Restructured Debtors across All Segments	Board of Directors, Board of Commissioners
42	June 24, 2025	Joint Meeting Agenda 3 Discussion on Credit Write Off Plan	Board of Directors, Board of Commissioners
43	June 26, 2025	Exit Meeting with BPKP	Board of Directors
44	July 1, 2025	Integrated Governance Committee Meeting Agenda II	Board of Directors, Board of Commissioners
45	July 3, 2025	Joint Meeting Agenda 1 Review of Bank Credit Policy	Board of Directors, Board of Commissioners
46	July 11, 2025	Board of Directors Meeting Agenda 2 Review of Derivative Procedures of Bank Credit Policy	Board of Directors, Board of Commissioners
47	July 14, 2025	Board of Directors Meeting Agenda 4 Update on Temporary Suspension of Dormant Account Transactions	Board of Directors
48	July 15, 2025	Risk Monitoring Committee Meeting Evaluation of Loan at Risk	Risk Monitoring Committee
49	July 17, 2025	Joint Meeting Agenda 3 Discussion on Internal Control Over Financial Reporting	Board of Directors, Board of Commissioners
50	July 31, 2025	Joint Meeting Agenda 1 Discussion on BNI IT Implementation	Board of Directors, Board of Commissioners
51	August 1, 2025	Integrated Risk Management Committee Meeting 02 of 2025	Board of Directors

No.	Meeting Date	Meeting Agenda	Participants
52	August 5, 2025	Integrated Governance Committee Self Assessment Semester I 2025	Integrated Governance Committee
53	September 1, 2025	Board of Directors Kick Off Meeting for Consolidated Financial Statement Audit FY 2025	Board of Directors
54	September 2, 2025	Audience with OJK regarding Change of Chief Audit Executive	Board of Directors
55	September 4, 2025	Town Hall Meeting Project Intelligent Branch	Board of Directors
56	September 4, 2025	Meeting on IT Services with the President Director	Board of Directors
57	September 9, 2025	Audit Committee Kick Off Meeting for FY 2025 Financial Statement Audit	Audit Committee
58	September 9, 2025	Whistleblowing System Report related to Human Capital	Board of Commissioners
59	September 10, 2025	Risk Awareness and Direction by Director of Finance and Strategy	Board of Directors
60	September 12, 2025	Submission of Audit Result Reports of BNI IT and BNI Life to BPK RI	Board of Directors
61	September 22, 2025	Discussion on Subsidiaries Follow Up on Integrated Internal Control Evaluation Semester I 2025	Board of Directors
62	September 24, 2025	Steering Committee Meeting Project Branch Transformation Intelligent Branch	Board of Directors
63	September 25, 2025	Review of Subordinated Loan Provision Policy and Credit Authority Framework	Board of Directors
64	September 25, 2025	Risk Maturity Index Assessment 2025	Board of Directors
65	September 29, 2025	Meeting with OJK regarding Bank Soundness Level	Board of Directors
66	September 30, 2025	Evaluation of BNI Internal Control System Semester I 2025	Board of Directors
67	September 30, 2025	Steering Committee Meeting Enterprise Financial System	Board of Directors
68	October 1, 2025	Implementation of New Region Area and Branch Model	Board of Directors
69	October 2, 2025	Evaluation of Anti Fraud Strategy Implementation	Board of Commissioners
70	October 9, 2025	Evaluation of Internal Control Effectiveness and Internal Audit Performance	Board of Commissioners
71	October 14, 2025	IT Project at BNI	Board of Directors
72	October 14, 2025	Review of Corporate Governance Guidelines	Board of Directors
73	October 17, 2025	Direction Meeting by Director of Finance regarding Audit Plan 2026	Board of Directors
74	October 17, 2025	Direction Meeting by Director of CMB regarding Audit Plan 2026	Board of Directors
75	October 20, 2025	Direction Meeting by Vice President Director regarding Audit Plan 2026	Board of Directors
76	October 20, 2025	Direction Meeting by Director of INS regarding Audit Plan 2026	Board of Directors
77	October 21, 2025	Audit Plan 2026 Discussion with Director of Network and Retail	Board of Directors
78	October 21, 2025	Self Assessment of BNI Risk Profile	Board of Directors
79	October 21, 2025	Risk Monitoring Committee Meeting	Risk Monitoring Committee

No.	Meeting Date	Meeting Agenda	Participants
80	October 22, 2025	Direction Meeting by Director of CMB regarding Audit Plan 2026	Board of Directors
81	October 23, 2025	Evaluation of Internal Audit Function Q3 2025	Audit Committee
82	October 23, 2025	Discussion on BNI Performance and Subsidiaries Performance as of September 2025	Board of Commissioners, Board of Directors
83	October 27, 2025	OJK Entry Meeting	Board of Directors
84	November 1, 2025	Evaluation of Remedial Recovery Performance and Legal Case Issues	Risk Monitoring Committee
85	November 4, 2025	Roadmap Strengthening Anti Fraud Strategy	Audit Committee
86	November 4, 2025	BPKP Entry Meeting	Board of Directors
87	November 4, 2025	Anti Fraud Strategy Roadmap for Subsidiaries	Integrated Governance Committee
88	November 10, 2025	ALCO Meeting	Board of Directors
89	November 12, 2025	Review of Credit Payment Policy	Board of Directors
90	November 24, 2025	Subsidiaries IT Synergy and IT Project Portfolio 2026	Board of Directors
91	November 25, 2025	Update on OJK Findings 2025 to Vice President Director	Board of Directors
92	November 27, 2025	OJK Exit Meeting	Board of Directors, Board of Commissioners
93	November 27, 2025	Subordinated Loan	Board of Directors, Board of Commissioners
94	December 2, 2025	Evaluation and Oversight of SLIK Audit Report 2025	Audit Committee
95	December 3, 2025	Steering Committee Meeting Project Branch Transformation Intelligent Branch	Board of Directors, Board of Commissioners
96	December 11, 2025	Root Cause Analysis of Credit Write Off and Risk Mitigation	Board of Directors, Board of Commissioners
97	December 12, 2025	Enterprise Financial System	Board of Directors
98	December 16, 2025	OJK Thematic Examination Exit Meeting DPUK 2025	Board of Directors
99	December 16, 2025	Fraud Report	Board of Directors, Board of Commissioners
100	December 17, 2025	ALCO Board of Directors Meeting	Board of Directors
101	December 18, 2025	General Risk Management Policy and Integrated Capital Policy 2025	Board of Directors, Board of Commissioners
102	December 18, 2025	Progress Meeting of FY 2025 Consolidated Financial Statement Audit by Public Accounting Firm	Board of Directors, Board of Commissioners
103	December 18, 2025	Discussion on Overseas Branch Visit Results by the Board of Commissioners	Board of Directors, Board of Commissioners
104	December 22, 2025	IT Operations and Fraud Detection System	IT Management Committee

Meeting Frequency and Attendance Rate

During 2025, IAD attended 103 (one hundred and three) meetings with the Board of Directors, Board of Commissioners, Audit Committee, and other committees, either as a participant or to present materials. The frequency and attendance rate of IAD meetings are outlined in the following table:

Number of Meetings	Total Attendace	% Attendace
103	103	100

Description	BOD Meeting	BOC Meeting	Audit Committee Meeting	Other Committee Meeting
Frekuensi Kehadiran IAD	80	33	5	7

Competency Development and/or Internal Audit Training in 2025

Development of Internal Audit Human Resources Competencies

IAD is committed to developing the competencies and capabilities of its auditors. To support this development, IAD has established a training/refreshment policy requiring all auditors to participate in a capability enhancement program at least once a year. The competency development programs implemented by IAD throughout 2025 are as follows:

Competency Development/Training Materials	Implementation Time	Organizer
Annual Training		
Annual Auditor Training	January 13 – February 03, 2025	BNU
Online/Offline Sharing Session & Webinar		
Race Talk Series: Next Level Integrated Credit Tool in Wholesale Banking	January 03, 2025	CRRCOB 4
Webinar with Theme: Ready to Implement CTAS: Digital Tax to Better Support Customer Business	January 22, 2025	WPPWDC
Strategy and Synergy of BNI Agen46 Towards 2025	January 24, 2025	Agen 46 Team – BNI
Building an Anti-Corruption Culture in Business Partnership Networks	February 11, 2025	Director of Human Capital & Compliance
BNI Webinar: Financial Crimes Sharing Session	February 18, 2025	Compliance and Financial Risk Management Experts in the Global Banking IndustryINT
Elevating Transaction with BNI Direct Cash Operating Account	February 26, 2025	WDC
Strengthening Anti-Fraud Awareness through the Implementation of POJK No. 12 of 2024 for Financial Services Institutions	February 28, 2025	Anti Fraud Strategy Department Head
BNIdirect Supply Chain Financing Solution: Redefining Efficiency, Agility, and Innovation	February 17, 2025	Trade & Supply Chain Digital Channel Department Head, WDC Division Supply Chain Financing Product Development Department Head, WPP Division
Through the BUMI Program Towards UMKM Go ESG & Go Global	April 21, 2025	SBP DivisionRPB DivisionEnterprise Risk Management Division
Webinar Digital Trends and Skills to Empower Digital Leadership Series #1 "Foundation of Digital Leadership – Adapting to Digital Transformation in Banking"	May 20, 2025	Education Figure and Information Technology Expert
Risk Management Webinar: "Dive into Sustainability Disclosure"	June 11, 2025	Vice President DirectorDirector of Risk Management
Webinar Digital Trends and Skills to Empower Digital Leadership Series #2: "Strategic Digital Leadership – Mastering Digital Leadership: Digital Marketing & Business Growth Optimization"	June 17, 2025	Business & Technology Integration Expert
Agile Ways of Working & Scrum Framework	July 9, 2025	PMP, PMI-ACP, PMO-CP

Competency Development/Training Materials	Implementation Time	Organizer
Webinar Awareness & Prudential Principles in Credit Provision to Improve Credit Quality	July 10, 2025	Retail Credit Risk Division HeadDetection & Investigation Department Head – Internal Audit Division
Webinar "ESG Webinar Series: Understanding Sustainability Financing"	July 21, 2025	ESG Management Department Head
Digital Trends & Skills to Empower Digital Leadership #3: Leading Team – Driving Digital Transformation	July 23, 2025	Expert in digital security for banking and payment systems
Empowering SMEs with BNIdirect Business	July 30, 2025	WDC Division
Webinar Series Checkpoint Retirement Readiness: Second Career Inspiration	August 22, 2025	Rice Commodity Entrepreneur Ornamental Plant Cultivation Entrepreneur
Linkgoals Series: Build Your Brand, Boost Your Career "The Importance of Personal Branding on LinkedIn"	September 09, 2025	New Maverick Digital Delivery IT DeveloperCOE Core Banking
Business Segment Credit Decision Program – Building Effective Leaders through Performance Management	September 11, 2025	HCBPNSD
Decision Making Based on the Business Judgement Rule Principle in the Framework of Good Corporate Governance and Anti-Corruption	September 16, 2025	President Director of BNIKPK
Webinar Series Sales Excellence: "Digital & Social Selling – Becoming a Reliable Marketer in the Digital Era"	September 24, 2025	Business & Marketing Consultant
Strategy to Address International Trade Remedies	September 25, 2025	Director General of Foreign Trade, Ministry of Trade of the Republic of Indonesia
Mapping Business Potential & POI	October 13, 2025	Data Management & Analytics Division
Leading Business: The Future of Banking – Artificial Intelligence & Blockchain Innovation	October 16, 2025	President Director of PT Peruri Digital Security
Loan at Risk Resolution: Effective Strategies to Restore Asset Quality	October 17, 2025	President Director of PT Sentral Java Multindo Auction HouseKPKNL Jakarta III
Unlocking Opportunities Series: Expanding Export Reach to India with Xpora & ITPC Chennai in India	October 27, 2025	Head of ITPC Chennai, India
Digital Forensics in Internal Audit: From Data to Evidence	October 31, 2025	BPKP
Wholesale Webinar Series: Socialization of Standard Pricing, Q-Card Sales, and Standard Deck Product	November 13, 2025	PM Lead, Operating Model & Business Establishment, AVATAR
Webinar & Zoominar Xpora Series: Expanding Export Reach to Saudi Arabia with Xpora & ITPC Jeddah	November 19, 2025	Head of ITPC Jeddah, Saudi Arabia
Webinar 9 Wonders – Mandatory Soft Competencies for BNI Hi-Movers	November 20, 2025	Daya Dimensi Indonesia
Webinar on Individual Annual Tax Return Reporting via DJP Coretax	November 25, 2025	ACC
Workshop on Legal & Policy Framework for Sustainable Waste to Energy Project	November 26, 2025	Jardin Legal SSF
Symphony of Integrity: Collaboration, Innovation, and Expression to Prevent Corruption	December 08, 2025	OJK

Competency Development/Training Materials	Implementation Time	Organizer
Certification Training Program		
ISO 27001:2022 ISMS Auditor / Lead Auditor Certification	February 17–21, 2025	SGS Academy Jakarta
IT Auditor Certification (BNSP)	March 22, 2025	LSP Digital Nusantara
CBIA Level Auditor Certification	May 17, 2025	LSPP
CBIA Level Supervisor Certification	May 17, 2025	LSPP
ISO 27001:2022 Certification	July 14–15, 2025	CISO
IT Auditor Competency Certification	July 14–15, 2025	LSPP
Indonesia Internal Audit Practitioner (IIAP) Certification Program	October 24, 2025	IIA Indonesia
SMR JK Level 6 Certification	November 13, 2025	BNSP & LSPP
Compliance Certification JK5	Batch I (Nov 20–24, 2025) Batch II (Nov 24–26, 2025)	LSPP & LPPI
CISA Certification	December 01–05, 2025	Multimatics
In-House Online Training		
Cybersecurity Training for Data Protection Officers (DPO)	July 12, 19, 26, 2025	BNU
Internal Audit Training – ISO 37001:2016 ABMS Expansion	November 03, 2025	CMP
Risk Management Maturity Assessment Training in SOEs	November 24, 2025	CRMS
Asset Liability Management Refreshment Program + ILAAP	December 06–07, 2025	BNU
Internal Sharing Session		
PKB Socialization	February 2025	IAD
Bancassurance In-Branch Staff Discount Program 2025	February 2025	IAD
Lessons Learned from Whistleblowing System Reporting	March 2025	IAD
Refreshment on Official Secrets and Bank Secrecy	June 2025	IAD
Refreshment Session: Wondr by BNI	July 2025	IAD
Follow-Up on Internal Audit Results	September 2025	IAD
Audit for Tomorrow: Strategic, Future Ready, Sustainable	October 2025	IAD
Internal Audit KPI Sharing	November 2025	IAD
Document Forensic Analysis and Body Language	December 2025	IAD
Quality Assurance Workshop Knowledge Sharing (IIA)	December 2025	IAD
Conference/Workshop		
IIA Indonesia National Conference “Auditor For Tomorrow”	August 27–28, 2025	IIA Indonesia
AAFM Workshop – Body Language & Document Forensics	August 27–28, 2025	AAFM
GRACS Conference (IT Governance, Risk, Assurance & Cybersecurity)	October 28, 2025	ISACA
Quality Assurance Workshop	December 03–04, 2025	IIA Indonesia
Seminar on Risk & Fraud in International Trade	December 09, 2025	IBI

Training and/or Competency Development for Internal Audit Unit Leader

In 2025, BNI IAD leaders participated in a number of training activities/seminars/workshops/certifications, as described below:

No.	Activity Title	Date Implemented	Organizer
1	Digital Forensics in Internal Audit: From Data to Evidence	October 31, 2025	BPKP
Public Training/Conference			
1	SMR Certification JK 6	November 13,2025	BNSP & LSPP
2	Indonesian Internal Audit Practitioner Certification Program (IIAP)	October 24, 2025	IIA Indonesia

Participation in the Internal Audit Unit Professional Association

In order to broaden horizons and improve professional competence amidst various industry challenges, Internal Audit involves internal auditors in various audit-related professional associations, including:

Internal Audit Participation in External Organizations

Name of Internal Auditor	Position	Name of Association/ Organization	Scope of Association/ Organization	Membership Role
Hedmon Yusfid	Head of IAD	The Institute of Internal Auditors – Indonesia (IIA)	International	Member
Adnan Rifanadhi	Detection & Investigation Department Head	Ikatan Auditor Intern Bank (IAIB)	National	Certification & Ethics Manager
Nanny Handayani	Audit Development Department Head	Ikatan Auditor Intern Bank (IAIB)	National	Research and Development Management
		The Institute of Internal Auditors – Indonesia (IIA)	International	Member
Imam Wibowo Sakti	Corporate Function & Subsidiaries Audit Department Head	Association of Certified Fraud Examiner (ACFE)	International	Member
		FKSPI	National	Chairperson of the Standards Committee
Sonny Okta Petandra	Network & Services Audit Department Head	FKSPI	National	Vice Chairperson for Organization & Legal Affairs
Dias Puspita	Lead Auditor - Digital Wholesale Audit	The Institute of Internal Auditors – Indonesia (IIA)	International	Member
		Information Systems Audit and Control Association (ISACA)	International	Member
		FKSPI	National	Member
Yazid Priadi Erfiandi	Lead Auditor - IT Security Audit	International Information System Security Certification Consortium (ISC2)	Internasional	Member
		Information Systems Audit and Control Association (ISACA)	Internasional	Member

In 2025, several institutions conducted benchmarking against BNI Internal Audit, as follows:

No	Benchmarking Date	Institution	Focus of Discussion
1	April 18, 2025	BSI	Audit Management Benchmark
2	August 2, 2025	Bank Jakarta	Audit Methodology
3	November 26, 2025	hibank	Overview of IT Audit Methodology

Internal Audit Work Plan for 2025

The Internal Audit Division (IAD) formulated a number of strategic initiatives as set out in the IAD Business Plan 2025. These initiatives were further elaborated operationally in the 2025 Annual Audit Plan as a guideline for the implementation of the work program. The strategies and plans were prepared in an integrated manner to ensure the effectiveness of IAD's supervisory role. The strategic initiatives implemented in 2025 are as follows:

1. Oversight of performance and business processes across all BNI segments to enhance asset quality;
2. Oversight of the strengthening of BNI's technology ecosystem to support the enhancement of digital technology capabilities;
3. Strengthening BNI's risk culture and risk awareness through the optimization of IAD's value-added services by conducting audits to support BNI's strategy, including:
   a. Audits using sprint audit methods for both general activities and IT audits;
   b. Audits of delivery channels (domestic) and overseas branches;
   c. Mandatory Audit;
   d. Audits of subsidiaries;
   e. Integrated Internal Audit Units.
4. Oversight of BNI's strategic activities through:
   a. Formal consultations on issues determined in the Annual Audit Plan or arising during its implementation
   b. Improvement programs on risk and fraud awareness, governance, and procedures through informal consultations, sharing sessions, or memoranda/letters to other units;
   c. Assignment of IAD personnel to oversee BNI's strategic projects;
5. Conducting in-depth audits for all incoming requests and audit results requiring further investigation;
6. Optimization of the early warning system function through increased automation of detection processes and follow-up actions in the form of limited reviews;
7. Encouraging improvements in the quality of internal audit through:
   a. Implementation of the QAIP for the internal audit function;
   b. Completion of recommendation targets resulting from internal audit function reviews;
   c. Upgrading the Audit Management System (AMS) technology;
8. Enhancing the quality of audit results through:
   a. Optimization and refinement of audit methodologies and tools;
   b. Zero corrections on Audit Result Reports submitted to the General Manager;
   c. Strengthening and developing auditors to support audit activities.
9. Improving flexibility and accessibility of data analytics surveillance to support the optimization of the early warning system function.

Based on an assessment of BNI's strategic policy direction for 2025, the Internal Audit Division formulated audit implementation strategies aligned with the Company's vision and mission. This assessment covered several key aspects, including risk assessment results, audit priority setting, available resources, and challenges faced by IAD in supporting the achievement of corporate objectives. IAD also considered developments in banking digitalization trends, particularly the shift in customer needs toward increasingly dominant digital-based transactions.

Taking these factors into account, Internal Audit established the following oversight strategies for 2025:

1. Optimal collaboration with assurance functions, namely SORX, CMP, ORM, ERM, AFR, and the Internal Audit Units of subsidiaries, including:
   a. Optimization of SORX data output as risk mapping data for IAD;
   b. Utilization of exception reports and selected reports from IAD Surveillance Units to support SORX examinations as BNI's internal assurance provider;
   c. Division of investigation functions with SORX;
   d. Optimization of ERM and ORM data output as risk mapping data for IAD;
   e. Establishment of audit investigation forums to determine investigation execution;
   f. Division of investigation functions with AFR;
   g. Integration between subsidiary Internal Audit Units and BNI Parent Internal Audit Unit.
2. Audit focus directed at the strategic level aligned with stakeholder concerns and BNI's 2025 strategic direction.

a. Increasing audits on strategic activities and issues to provide recommendations and improve BNI's business processes;
b. Optimizing consultation functions, including independent reviews of new product or activity launches, reviews and oversight of digital business development projects, and assignment of IAD personnel to specific project teams while maintaining independence, objectivity, and adherence to the Internal Audit Code of Ethics;
c. Conducting mandatory audits to comply with regulatory requirements.

3. Business process improvement through continuous monitoring and surveillance audits, including:
   a. Optimization of data analytics surveillance for general and thematic audits with more focused audit sampling.
   b. A reviewable Annual Audit Plan adjusted to developments in BNI's business.

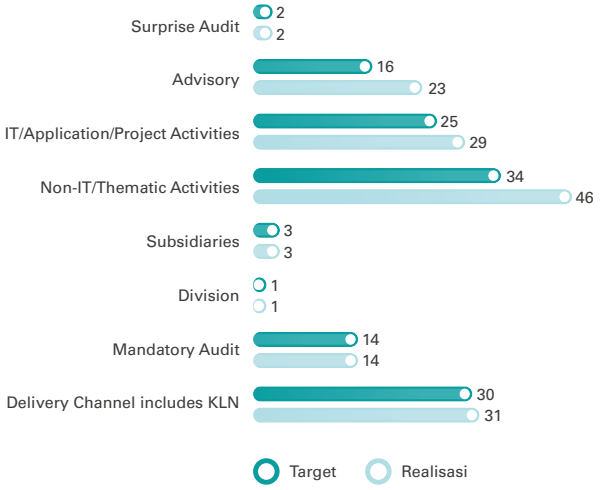
4. Optimization of in-depth audits using mandays from the Investigation & System Whistleblowing Department.
5. Optimization of available mandays for continuous auditing, consultation, audit sharing, and auditee monitoring.
6. Enhancement of the Audit Management System (FAST) through the Enhancement Data & Technology Refreshment Audit Management System process, currently conducted by the Information Technology Work Unit (SKTI).

Report on the Realization of Internal Audit and Consultation Activities in 2025

In 2025, IAD determined the focus of audit and consultation activities as "Oversight of healthy and sustainable business growth across all segments, with a focus on increasing productivity and improving business processes through platform strengthening."

During the year, Internal Audit carried out 149 assignments, consisting of surprise audits, thematic audits, IT audits, subsidiary audits, divisional audits, mandatory audits, delivery channel audits, and advisory services. This realization exceeded the initial assignment plan of 125 assignments, achieving an audit realization rate of 119.20%, while mandatory audits reached 100% completion:

Audit & Consulting Realization 2025
(%)



In implementing the 2025 audit plan, Internal Audit conducted two types of audit activities, namely regular audits and ad-hoc audits. Regular audits were systematically planned under the Annual Audit Work Plan and implemented using a Risk-Based Audit (RBA) approach, focusing audit efforts on areas with significant risk to the achievement of the Bank's objectives. Meanwhile, ad-hoc audits were conducted outside the annual plan in response to emerging needs, based on discussions with management, auditee requests, or IAD's own initiative. Through the combination of regular and ad-hoc audits, IAD actively ensured the effectiveness of governance, risk management, and internal control systems in an adaptive manner aligned with business dynamics.

The implementation of regular and ad-hoc audits during 2025 is described as follows:

1. IAD conducted five ad-hoc assignments, namely:
   a. Review of credit utilization to the Ministry of Finance of the Republic of Indonesia at the London Overseas Branch;
   b. Review of IT application promotion processes;
   c. Review of follow-up actions from BI Coaching Clinic – LBUT;
   d. Thematic audit on the implementation of the Frontliner Revolution;
   e. Review of One-Time Password (OTP) management.

2. IAD conducted 9 investigative audits, consisting of 5 (five) credit-related examinations and 4 (four) non-credit examinations.

3. IAD also provided consultation services, both formally and informally, including independent reviews of new product or activity launches to fulfill OJK requirements, oversight of specific events at the request of auditees or management,

or on IAD's own initiative. Advisory consultation services in 2025 included:

a. Advisory on the New Channel Model;
b. Consultation on Social and Environmental Responsibility;
c. Advisory on the Branch Transformation Back Office Project;
d. ISO 27001:2022 Information Security API;
e. Digital Maturity Assessment Bank (DMAB) 2025;
f. Audit review of intra-group risk;
g. Review of operational risk management;
h. Risk Maturity Index;
i. ICAAP audit;
j. Review of cyber resilience and security maturity levels;
k. Audit of KJPP management;
l. Consultation for the Java Jazz Festival 2025 event;
m. Preliminary assessment of Representative Offices in Amsterdam and Sydney for the preparation of the 2026 Annual Audit Plan;
n. Review of credit utilization to the Ministry of Finance of the Republic of Indonesia at the London Overseas Branch;
o. Evaluation of internal control systems at overseas branches;
p. Review of follow-up actions from BI Clinic – LBUT;
q. Audit of the implementation of the Commercial Segment Credit Risk Organization;
r. Evaluation of BNI's Internal Control System (ICS) for 2024/2025;
s. Evaluation of the Integrated Internal Control System (ICS) for 2024/2025.

Audit and consultation results in the form of Audit Result Reports were submitted and reported to the President Director, Board of Commissioners, Audit Committee, Director of Human Capital & Compliance, and the Directors overseeing the audited sectors.

Follow-Up on Audit Results

As part of the audit process, after audit reporting is completed, IAD is required to monitor audit results. Monitoring activities are conducted to ascertain and ensure the implementation of audit follow-up actions, including the completion of Internal Audit recommendations by auditees and other related parties.

On a quarterly basis, IAD submits updates on the completion of audit follow-up actions in the form of a Pending Audit Follow-Up Report to the Board of Directors, SEVPs, and the Board of Commissioners through the Audit Committee. This report plays a crucial role in monitoring progress, accelerating the completion of follow-up actions, and serving as a basis for evaluation and performance monitoring at BNI.

Number of Internal Audit Findings and Follow-up in 2025

The level of completion of pending follow-up, Audit Recommendations and Directors' Disposition on audit results for 2023-2025 are as follows:

Description	December 31, 2025	December 31, 2024	December 31, 2023
Total Due	2,237	5,003	6,833
Completed	2,211	4,998	6,830
Completion Progress	99.83%	99.88%	92.16%

In relation to the role of Internal Audit as a liaison for external parties, such as the OJK, BI, BPK, and KAP, BNI's IAD also monitors the follow-up on the results of external audits. Throughout 2025, the follow-up on external audit results is reflected in the table below:

External Audit	2025	
	Completed	In Progress
Bank Indonesia (BI)	130	0
Financial Services Authority (OJK)	1,418	0
Indonesian Audit Board (BPK RI)	392	166
Financial and Development Supervisory Agency (BPKP)	21	0
Public Accountant Firm (KAP)	10	0

Assessment and Evaluation of the Internal Audit Unit's Performance in 2025

In 2025, the Internal Audit User Satisfaction Survey (USS) Index was recorded at 3.82, compared to 3.90 in the previous year, in line with increasing stakeholder expectations of the Internal Audit function's role as a strategic business partner in supporting the achievement of BNI's business objectives.

Performance evaluation was also conducted through the distribution of questionnaires to auditees and their supervisors after the audit process. The assessment covered various aspects, including audit management, audit execution, reporting of audit findings and IAD recommendations, as well as the competency, professionalism, and communication of the audit team. The evaluation yielded an average score of 4.57 out of a maximum of 5.

Internal Audit Work Plan for 2026

To ensure the sustainable implementation of work programs and the achievement of optimal performance on an annual basis, the Internal Audit work plan for 2026 is outlined below. This plan is prepared based on the evaluation of performance in 2025 as well as directives from the Board of Directors, so that the planned programs are aligned with the Company's strategy and support the achievement of long-term targets. The details of the work programs to be implemented are as follows:

1. Intensifying risk-based assurance and advisory functions through the implementation of thematic audits, unit-based audits, and surprise audits to provide more focused and responsive monitoring of high-risk areas.
2. Strengthening strategic oversight of the resilience, security, and reliability of information technology systems, ensuring that infrastructure capabilities and technology controls adequately support the continuity of the Bank's operations.
3. Continuing the implementation of agile audit methodologies with a streamed cycle approach, enabling audit coverage across functions, segments/channels, and products in a more adaptive and relevant manner.
4. Optimizing the Early Warning System through enhanced data analytics capabilities, strengthened surveillance activities, and the implementation of Continuous Auditing and Continuous Monitoring (CACM) to proactively support the internal control system and risk detection.
5. Optimizing the Early Warning System through enhanced data analytics capabilities, strengthened surveillance activities, and the implementation of Continuous Auditing and Continuous Monitoring (CACM) to proactively support the internal control system and risk detection.
6. Developing auditor competencies on an ongoing basis through certification programs, structured training, and cross-functional assignments to broaden perspectives and improve the quality of audit execution.

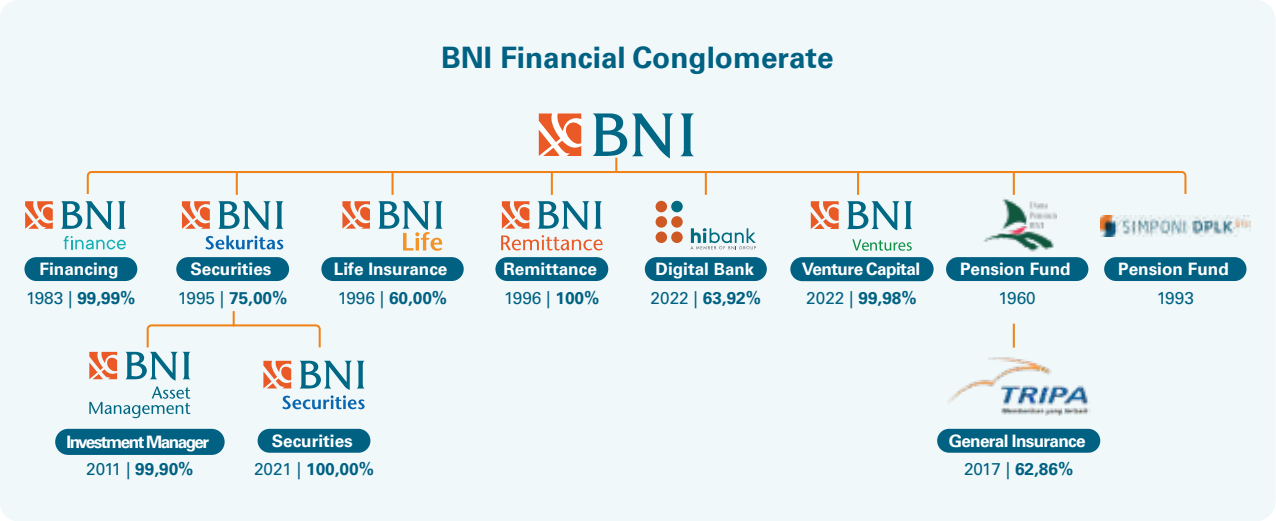
INTEGRATED INTERNAL AUDIT WORK UNIT (SKAIT)

To strengthen the comprehensive and effective implementation of Integrated Governance (TKT), BNI, as the Main Entity (in its capacity as the Financial Conglomeration Parent Entity or PIKK), has incorporated an integrated internal audit function into its Internal Audit Division's organizational structure. This function ensures consistent monitoring and oversight of internal audit work across all Financial Services Institutions (LJKs) within the BNI Financial Conglomeration. As a professional, independent, and objective business partner to Management, BNI's Internal Audit Division runs both assurance and advisory functions in collaboration with the Financial Conglomeration's Internal Audits.

The integrated internal audit's activities are carried out in accordance with Financial Services Authority Regulation (POJK) No. 30 of 2024 on Financial Conglomerations and Financial Conglomeration Parent Entities regarding the Implementation of Integrated Governance for Financial Conglomerations. In discharging its duties and responsibilities, the Integrated Internal Audit Unit at BNI Financial Conglomeration is guided by the Integrated Audit Implementation Procedures and the BNI Financial Conglomeration Integrated Governance Guidelines 2023. The written guidelines offer operational foundation for the Internal Audit Division, as the Main Entity (PIKK) and the Internal Audit Units of each Financial Services Institution within the BNI Financial Conglomeration, for implementing integrated monitoring and oversights. With the guidelines in place, the integrated internal audit function is expected to enhance consistency, improve control effectiveness, and promote the overall quality of governance implementation across the BNI Financial Conglomeration.

Organizational Structure of the Integrated Internal Audit Unit in BNI's Financial Conglomerate

The organizational structure of the Integrated Internal Audit Unit (SKAI) within the BNI Financial Conglomeration as of December 31, 2025, is as follows:



In performing its duties, the Internal Audit Unit of the Main Entity (PIKK) may give assurance and advices to members of the BNI Financial Conglomeration, either on an individual basis, through joint audits, buddy supervision, and/or by leveraging audit results from the Internal Audit Units of Financial Conglomeration members. In addition, the Internal Audit Unit of the Main Entity (PIKK) also monitors the follow up on audit findings and recommendations issued by the Main Entity's Internal Audit Unit, internal auditors, external auditors, as well as the results of supervision by the Financial Services Authority (OJK) and/or other regulatory authorities, to ensure that such findings and recommendations have been duly addressed by members of the BNI Financial Conglomeration.

Duties and Responsibilities of the Integrated Internal Audit Unit

The Internal Audit Unit of the Main Entity (PIKK) has the following duties and responsibilities, among others:

1. Evaluating and providing input on the adequacy of the audit methodology, policies, and procedures of the Internal Audit Units of Financial Services Institution members of the Financial Conglomeration, taking into account the size, characteristics, and complexity of each member institution, across all stages of the audit process, including audit planning, audit execution, audit reporting, and monitoring of follow up actions.
2. Submitting reports on key findings of integrated audit results to the President Director and the Board of Commissioners of the Main Entity (PIKK), with a copy to the Director overseeing the Compliance Function of the Main Entity (PIKK).
3. Monitoring the follow up of internal audit results on an integrated basis and reporting the outcomes to the President Director and the Board of Commissioners of the Main Entity (PIKK), with a copy to the Director overseeing the Compliance Function of the Main Entity (PIKK).
4. Submitting integrated internal audit reports to the President Director, the Director appointed to oversee the Financial Services Institution members of the Financial Conglomeration, the Board of Commissioners of the Main Entity (PIKK), and the Director overseeing the Compliance Function of the Main Entity (PIKK).
5. Monitoring and following up on the implementation of recommendations issued by the Integrated Governance Committee.
6. Acting as the Third Line of Defense, the Internal Audit Unit of the Main Entity (PIKK) ensures the effectiveness of internal controls across all lines within the BNI Financial Conglomeration through the conduct of audits and consultations for Financial Services Institution members of the Financial Conglomeration. In this capacity, the Internal Audit Unit of the Main Entity (PIKK) may conduct audits and consultations for Financial Services Institution members without requiring prior approval from the Boards of Commissioners of those institutions.
7. Conducting internal oversight of all areas, operational activities, and business activities, and coordinating with internal oversight functions at Financial Services Institution members of the Financial Conglomeration, as stipulated in the internal audit charter.
8. Promoting synergy in the development of auditors of the Internal Audit Units of Financial

Services Institution members together with BNI's parent Internal Audit Unit, in accordance with the Memorandum of Understanding on Integrated Audit Units concerning Audit Quality Development for the BNI Financial Conglomeration.

In addition to carrying out the above main responsibilities, SKAI Terintegrasi also conducts periodic reviews of the Integrated Governance Guidelines.

Scope of Integrated Internal Audit

The scope of the integrated internal audit extends to all entities within the BNI Financial Conglomeration. This audit covers all aspects and elements of the activities of Financial Services Institutions that are members of the Financial Conglomeration, whether conducted directly or indirectly. In practice, the integrated internal audit considers all applicable regulations and weighs the size, characteristics, and complexity of each Financial Services Institution within the conglomeration. To carry out these duties and responsibilities, including the enhancement of audit quality, the Internal Audit Division (IAD) and the Internal Audit Units of Financial Conglomeration members integrate their internal audit functions, with the scope covering the following areas:

1. Integrated Audit Methodology
   The Internal Audit Unit of the Main Entity (PIKK), together with the Internal Audit Units of Financial Conglomeration members, conducts alignment and evaluation covering audit methodologies, policies, and procedures of each Financial Conglomeration member, in accordance with their respective size, characteristics, and complexity, including through the following measures:
   a. The Internal Audit Unit of the Main Entity (PIKK) coordinates the alignment of the risk based audit methodology applied by the Internal Audit Units of Financial Conglomeration members;
   b. The Internal Audit Unit of the Main Entity (PIKK) provides input on the adequacy of audit policies and Standard Operating Procedures of Financial Conglomeration members.
2. Integrated Audit Planning
   The Internal Audit Unit of the Main Entity (PIKK), together with the Internal Audit Units of Financial Conglomeration members, prepares an Integrated Annual Audit Plan through the following mechanisms:
   a. The Internal Audit Unit of the Main Entity (PIKK) provides input on the annual audit plans prepared by the Internal Audit Units of Financial Conglomeration members based on the established audit focus;
   b. Information on audit results from the Internal Audit Units of Financial Conglomeration members is used by the Internal Audit Unit of the Main Entity (PIKK) as evaluation material in preparing the integrated audit plan;
   c. The Internal Audit Unit of the Main Entity (PIKK) consolidates the integrated annual audit plan and submits it to the President Director and the Board of Commissioners of the Main Entity (PIKK).
3. Implementation of Integrated Audit
   The implementation of integrated audits is carried out through the following approaches:
   a. Individual audits conducted by the Internal Audit Unit of the Main Entity (PIKK);
   b. Joint audits;
   c. Buddy supervision.
4. Development of Integrated Auditor Competency
   The Internal Audit Unit of the Main Entity (PIKK), together with the Internal Audit Units of Financial Conglomeration members, undertakes auditor competency development through the following mechanisms:
   a. The Internal Audit Unit of the Main Entity (PIKK) includes auditors from Financial Conglomeration members in joint training programs organized by BNI's Internal Audit Division, such as Auditor Refreshing programs;
   b. The Internal Audit Unit of the Main Entity (PIKK) and the Internal Audit Units of Financial Conglomeration members provide opportunities for auditor secondments or internships at Financial Conglomeration member institutions and at BNI's Internal Audit Division.
5. The Internal Audit Unit of the Main Entity (PIKK) may assign its auditors as Heads of Internal Audit Units or as auditors at Financial Services Institutions that are members of the Financial Conglomeration.
6. Authority of the Internal Audit Unit of the Main Entity (PIKK)
   The authority of the Internal Audit Unit of the Main Entity (PIKK), as the Integrated Internal Audit Unit (SKAIT), refers to BNI's Corporate Guidelines on the Procedures for the Implementation of Integrated Internal Audit and the BNI Corporate Charter.
7. Reporting of Integrated Audit Results
   a. The Internal Audit Units of Financial Conglomeration members submit reports on the implementation of their internal audit functions to the Internal Audit Unit of the Main Entity (PIKK) through an integrated internal audit communication forum on a quarterly basis. Such reports shall at a minimum include the following information:
      1) Annual and periodic audit plans of the Internal Audit Units of Financial Conglomeration members;
      2) Realization of audit implementation by the Internal Audit Units of Financial Conglomeration members;

3) Key audit findings from the Internal Audit Units of Financial Conglomeration members and external audits at Financial Conglomeration members;
4) Follow up on audit findings from the Internal Audit Units of Financial Conglomeration members, BNI's Internal Audit Division, and external auditors at Subsidiaries within the Financial Conglomeration;
5) Internal Audit Maturity Profile of Financial Conglomeration members.

b. The Internal Audit Unit of the Main Entity (PIKK) submits Integrated Internal Audit Reports, which include information on key integrated audit findings and the follow up on such findings, with the following reporting frequency:
1) Reports are submitted quarterly to the Director appointed to oversee Financial Conglomeration members and to the Director overseeing the Compliance function at the Main Entity (PIKK);
2) Reports are submitted semi annually to the Board of Commissioners of the Main Entity (PIKK).

Implementation of Integrated Audit Activities in 2025

Throughout 2025, the Integrated Internal Audit Unit monitored and reported the implementation of integrated internal audits and periodically submitted them to the Compliance Director of the Main Entity (PIKK) and the Board of Commissioners of the Main Entity (PIKK). To ensure the effectiveness and compliance of integrated internal audit implementation with OJK requirements, BNI's Internal Audit Division (IAD), as the Main Entity (PIKK), together with the Internal Audit Units of Financial Conglomeration members, undertook a number of strategic measures and strengthening initiatives across the BNI Financial Conglomeration. These activities included the following:

1. Conducting Working Meetings with the Internal Audit Units of Financial Conglomeration members and the Subsidiaries Management Division, with agendas covering:
   a. Alignment of Audit Work Plan implementation between the parent entity and Financial Conglomeration members for 2025;
   b. Implementation of combined assurance mechanisms across Financial Conglomeration members;
2. Conducting the Integrated Audit Unit communication forum, which is held regularly every quarter, namely Quarter I/2025 in April 2025, Quarter II/2025 in July 2025, Quarter III/2025 in October 2025, and Quarter IV/2025 in January 2026, among other things, to discuss:
   a. Audit plans of the Internal Audit Units of Financial Conglomeration members;
   b. Realization of audit work plans of the Internal Audit Units of Financial Conglomeration members;
   c. Key audit findings of the Internal Audit Units of Financial Conglomeration members;
   d. Progress on the follow up of audit findings from the Internal Audit Units of Financial Conglomeration members, BNI IAD, and external audits conducted by BPK, Bank Indonesia, OJK, and other authorities.
3. Developing an Internal Control System assessment methodology for Financial Conglomeration members, aligned with the organizational relevance of each member entity;
4. Preparing updates to the implementation guidelines for the Integrated Internal Control System, including updates and additions to sub parameters and revisions to scoring at the sub parameter level.
5. Conducting semi annual evaluations of the Integrated Internal Control System for each Financial Conglomeration member;
6. Monitoring the maturity profile of the Internal Audit Units of Financial Conglomeration members, covering organizational structure, fulfilment of auditor headcount, auditor capability including certification and training, completeness of enabling outputs, and development plans for the Internal Audit Units of Financial Conglomeration members;
7. Discussing the follow up on recommendations and advice from the BNI Board of Commissioners addressed to Financial Conglomeration members;
8. Conducting buddy supervision for audits of Project Management and Procurement at BNI Life, as well as joint audits with BNI Sekuritas auditors for the audit of BNI Asset Management.
9. Conducting knowledge sharing sessions on IT audit and Internal Control Over Financial Reporting for Hibank, and on Personal Data Protection for BNI Asset Management.
10. Providing assistance in reviewing the Internal Audit Charters of BNI Finance and BNI Asset Management.
11. Sharing audit programs with Hibank related to IT and non IT areas, as follows:

    Non IT
    - Information Security and Cyber Resilience audit program;
    - Consumer Complaint Services audit program;
    - SLIK audit program;
    - Goods and Services Procurement audit program;
    - Technical Guidelines for ICoFR.

IT
- Payment Service System audit program, including Mobile Banking and Internet Banking;
- ATM Management audit program;
- Implementation of APU, PPT, and PPPSPM audit program;
- Information Technology audit program
- Audit program on the implementation of Anti Fraud Strategy activities, including SIPELAKU;
- Audit program on Information Technology Service Providers;
- Application Programming Interface audit program.

12. Organizing training programs for all auditors of the Main Entity (PIKK) and Internal Audit Units of Financial Conglomeration members, covering topics such as corruption related crimes, banking crimes, Internal Control Over Financial Reporting, penetration and vulnerability testing, personal data protection and data security, digital forensic audit, design thinking, IT fundamentals batch 1, and data analytics.

COMPLIANCE FUNCTION

The Compliance Function at BNI is a key pillar for practicing sound corporate governance and a crucial part of maintaining business continuity with integrity, grounded in prudent principles. This function is tasked with ensuring that all BNI operational and business activities consistently comply with applicable laws and regulations, regulatory authorities, and internal policies, while also instilling a culture of compliance throughout the organization.

In its implementation, the BNI Compliance Function does not remain reactive; it keeps its priority on a preventive (ex-ante) approach to mitigating potential compliance risks across all business activities. This role aligns with one of BNI's sixth missions, "To Become a Reference for the Implementation of Compliance and Good Corporate Governance for the Industry," ensuring that the Compliance Function is a key driver in maintaining the consistent implementation of high-standard compliance and governance principles within BNI.

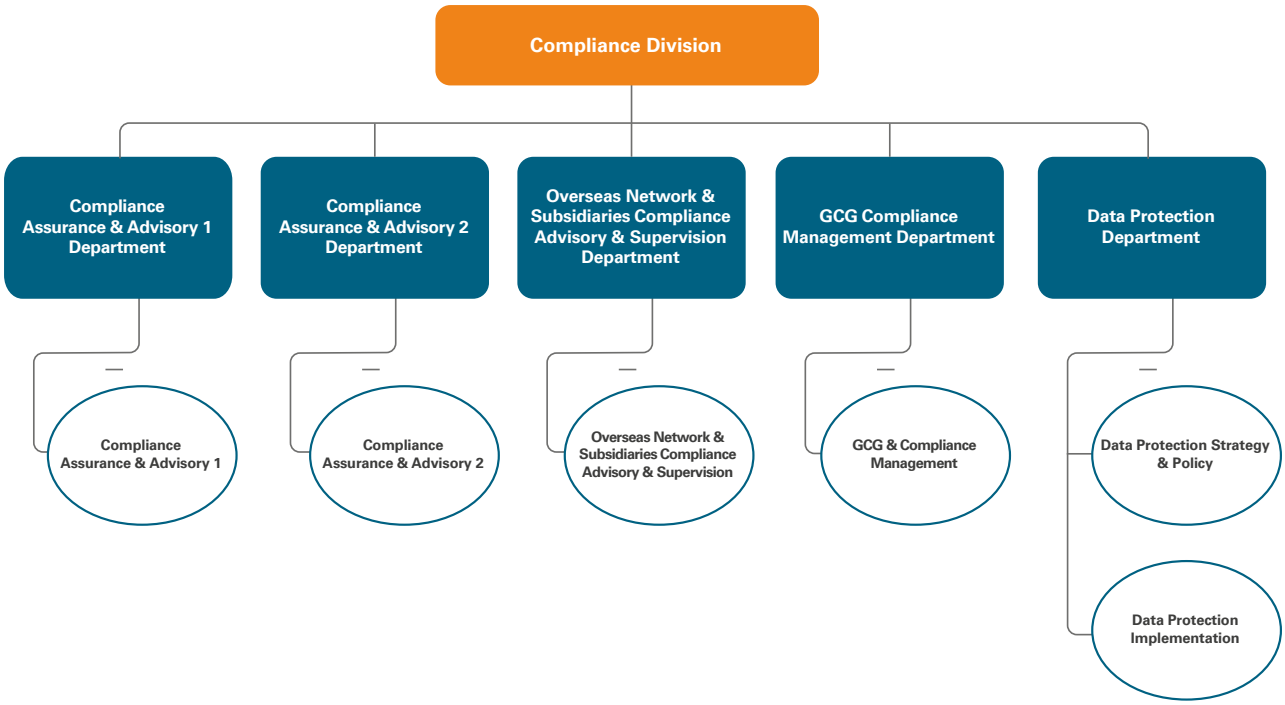
Legal Basis for the Compliance Function

The implementation of BNI's Compliance Function is guided by relevant regulations, including:
1. OJK Regulation No. 46/POJK.03/2017 concerning the Implementation of Compliance Functions for Commercial Bank;
2. OJK Regulation No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates.
3. OJK Regulation No. 17 of 2023 concerning the Implementation of Governance for Commercial Banks.

Organizational Structure of the Compliance Work Unit

BNI has a Director who oversees the Compliance Function and formed a Compliance Division to implement the compliance function.The Compliance Director is responsible for formulating compliance policies and strategies. The Compliance Division, as the spearhead of implementation, ensures that all business units and support functions at BNI carry out their activities in accordance with applicable regulations.

In 2025, there was a change in the organizational structure of the Compliance Division, namely that the implementation of the AML-CFT and PPPSPM programs became the responsibility of the AML-CFT Division. The organizational structure of the Compliance Division based on the Decree of the Board of Directors No. KP/440/DIR/R dated September 4, 2025 is described in the following chart:



Head of Compliance Work Unit Profile

Period January 1, 2025 – November 30, 2025



Ikhsan Azman
Head of Compliance Work Unit

Age
56 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Bachelor of Economics and Accounting from the Faculty of Economics, Department of Accounting, Andalas University (1993);
- Master of Agribusiness Management from the Postgraduate Program, Bogor Agricultural University (2004).

Legal Basis of Appointment
Appointed as Compliance Division Head based on the Board of Commissioners Decree No. KP/595/DIR/R dated July 14, 2023

Term of Office
July 20, 2023-November 30, 2025

Professional Certification and/orTraining
1. Risk Management Certification
2. Data Protection Officer Certification

Work Experience at BNI
At BNI
1. Vice President in Internal Audit Unit (2018-2022)
2. Divisi di Policy Governance Division Head (2022-2023)
3. Compliance Division Head (July 2023 - November 30, 2025).

Concurrent Position
Does not hold concurrent positions either internally or externally at BNI.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders

Period 1 December 2025 – present



Mochammad Irfan Maulana
Pemimpin Divisi Compliance

Age
46 years old as of December 31, 2025

Citizenship
Indonesian

Domicile
Jakarta, Indonesia

Educational Background
- Associate Degree in Telecommunications Engineering from Brawijaya University (2000)
- Bachelor of Engineering from the Faculty of Electrical Engineering, 10 Nopember University of Technology (2004)
- Master of Management from the Graduate School of Management, University of Indonesia (2009)
- Master of Business Administration, University of Birmingham (2016).

Legal Basis of Appointment
Appointed as Compliance Division Head based on Board of Directors Decree No. KP/767/DIR/R dated December 22, 2025.

Term of Office
December 31, 2025 - present

Professional Certification and/or Training
1. Risk Management Certification
2. Certified Information System Auditor

Work Experience at BNI
At BNI
1. IT Audit & Surveillance Department Head (Vice President) in Internal Audit (2024 – 2025)
2. Acting Compliance Division Head (December 1, 2025 – December 21, 2025)
3. Compliance Division Head (December 22, 2025 – Present)

Concurrent Position
Not holding concurrent positions either internally or externally at BNI.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders

Mechanism for Appointment and Dismissal of ComplianceWork Unit Leaders

The Head of the BNI Compliance Division is appointed and dismissed based on the decision of the Board of Directors and has been reported to the OJK, with attention to the following criteria and requirements:
1. Meet the independence requirements;
2. Master the banking provisions and applicable laws and regulations;
3. Not carrying out other duties outside the compliance function;
4. Have a high commitment to implementing and developing a compliance culture.

Duties and Responsibilities of the Compliance Work Unit

In general, the duties and responsibilities of the Compliance Division are divided into the following functions:
1. In charge of the Compliance Function;
2. In charge of the Integrated Compliance Function;
3. In charge of the Implementation of Good Corporate Governance;
4. In charge of the Gratification and Anti-Bribery Control; and
5. Personal Data Protection Function Implementer.

Director in Charge of Compliance Functions

The Director of Human Capital & Compliance at BNI is currently responsible for the compliance function at BNI, held by Mr. Munadi Herlambang. The appointment and implementation of the duties of the Director in charge of the compliance function are carried out in accordance with applicable regulations, including provisions regarding the Implementation of the Compliance Function, General Provisions, Fit and Proper Test, as well as regulations regarding the Utilization of Foreign Workers in the banking sector. These provisions regulate several things, including:
1. Must obtain approval from the Financial Services Authority (OJK) before carrying out the duties and functions of its position. Through Financial Services Authority Letter No. SR-491/PB.02/2025 dated November 26, 2025, the Financial Services Authority approved the appointment of Mr. Munadi Herlambang as Director of Human Capital & Compliance;
2. Must meet independence requirements, namely not having financial, management, share ownership, and/or familial relationships up to the second degree with members of the Board of Commissioners, the Board of Directors, and/or Controlling Shareholders or relationships with the Bank that could affect their ability to act independently;

3. Must have integrity and adequate knowledge regarding banking provisions and applicable laws and regulations;
4. It is prohibited to employ or utilize foreign workers;
5. Not concurrently serving as President Director and/or Deputy President Director;
6. Does not supervise the functions: operational business and risk management, which make decisions on bank activities, treasury, finance, accounting, logistics, procurement, information technology, and internal audit.

In the current BNI organizational structure, the implementation of the duties of the BNI Human Capital & Compliance Director is supported by the organs below, namely:
1. SEVP Legal & Governance;
2. SEVP Human Capital;
3. Compliance Division;
4. Legal Division;
5. Policy Governance Division;
6. AML-CFT Division;
7. Human Capital Strategy Division;
8. Human Capital Services Division;
9. BNI University;
10. Human Capital Business Partner.

Duties and Responsibilities of the Director in Charge of the Compliance Function

The following is a description of the duties and responsibilities of the Director of Human Capital & Compliance specifically regarding the implementation of the Bank's compliance function in general:
1. Formulate strategies to encourage the creation of a culture of Bank compliance;
2. Propose a compliance policy or compliance principles that will be determined by the Board of Directors;
3. Establish compliance systems and procedures that will be used to develop Bank internal regulations and guidelines;
4. Ensure that all policies, provisions, systems, and procedures, as well as business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority, Bank Indonesia, and applicable laws and regulations;
5. Minimize Bank Compliance Risk;
6. Take preventive measures so that policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority, BI, and applicable laws and regulations;
7. Carrying out other tasks related to the Compliance Function, such as monitoring and maintaining the Bank's compliance with commitments made by the Bank to the Financial Services Authority, BI, and other competent supervisory authorities;
8. In addition to the duties and responsibilities above, in the context of implementing the integrated compliance function, the Director in charge of the compliance function has the task of directing, monitoring, and evaluating the implementation of the Integrated Compliance function as well as following up on suggestions and advice from the Board of Commissioners of the Main Entity or the Integrated Governance Committee in order to improve the Integrated Compliance Function.

COMPLIANCE WORK UNIT

The work unit that carries out the Compliance Function within BNI is carried out by the Compliance Division. This division is an independent work unit and is directly responsible to the Director who is in charge of the compliance function. In addition, the Compliance Division is also assigned as an Integrated Compliance Work Unit and functions for the implementation of Personal Data Protection (Data Protection Officer/DPO).

Integrated ComplianceWork Unit (SKKT)

As an Integrated Compliance Work Unit (SKKT) in the BNI Financial Conglomerate, the Compliance Division is tasked with monitoring and evaluating the implementation of compliance functions in Subsidiary Companies in accordance with the provisions of POJK No. 18/POJK.03/2014 concerning the Implementation of Integrated Governance for Financial Conglomerates. The BNI Financial Conglomerate's Integrated Governance Guidelines have determined the division of monitoring and evaluation tasks carried out by SKKT, including:
1. Realizing the implementation of a culture of compliance at all levels of the organization in each Subsidiary Company;
2. Manage compliance risks faced by each Subsidiary Company;
3. Ensure that policies, provisions, systems, and procedures, as well as business activities carried out by each Subsidiary Company are in accordance with regulatory provisions (includingOJK, Bank Indonesia, Ministry of Finance, etc.) and applicable laws and regulations, including sharia principles for Subsidiary Companies that implement sharia principles.
4. Ensure compliance of each Subsidiary Company with the commitments made by the Subsidiary Company to OJK, Bank Indonesia, and/or other competent supervisory authorities; and
5. Ensure the implementation of compliance functions and the implementation of applicable APU PPT and PPPSPM in each Subsidiary Company.

Data Protection Officer (DPO)

The Data Protection Office (DPO) at BNI is a dedicated unit dedicated to ensuring compliance with applicable personal data protection regulations. The DPO plays a strategic role in ensuring that all personal data management activities within BNI are carried out securely, ethically, and in accordance with legal provisions, including Law No. 27 of 2022 concerning Personal Data Protection (PDP Law) and other relevant regulations issued by the authorities. As an implementation of the PDP Law, the Data Protection Officer's primary functions include:

1. Prepare, develop, and implement strategies, governance, policies, and procedures for personal data protection at BNI in accordance with applicable regulations.
2. Develop an awareness program on personal data protection for all lines of the BNI organization.
3. Provide advisory and consultation regarding the implementation of personal data protection, including but not limited to:
   a. Fulfillment of Personal Data Subject Rights, Prevention and/or failure of personal data protection;
   b. Development of Division/Unit/Functional Unit applications related to personal data processing;
   c. Record of Processing Activities (RoPA), Data Protection Impact Assessment (DPIA), consent management, and others.
4. Conduct reviews of new product and/or activity plans to comply with privacy by design.
5. Review draft policies, procedures, and technical guidelines for BNI units related to Personal Data Protection.
6. Monitor and ensure BNI's compliance with the Personal Data Protection Law and internal regulations related to Personal Data Protection.
7. Review and provide input on the adequacy of systems, policies, procedures, and tools in the implementation of Personal Data Protection in Subsidiaries.
8. Evaluate the implementation of Personal Data Protection in Subsidiaries.
9. Disseminate Personal Data Protection throughout the organization.
10. Act as a liaison to regulators.
11. Conduct monitoring and evaluation, including ensuring follow-up actions on audit results to improve the implementation of personal data protection.
12. Prepare a study on the development of Personal Data Protection tools to support BNI's business needs.
13. Manage the development of a support system for the implementation of Personal Data Protection.
14. Manage the recording of personal data processing activities and consent management.
15. Act as a coordinator for handling incidents of personal data protection violations.

Training and/or Competency Development for Compliance Unit Leaders in 2025

By 2025, BNI's Compliance Unit Leaders have participated in a series of educational and training activities to enhance their competency in monitoring and evaluating the Bank's compliance with applicable standards and regulations:

Type of Training and Competency Development/Training Materials	Date of Implementation	Organizer
Enhancement Skill for Compliance Officer (ESCO)	February 19-21, 2025	BNI
Digital Trends and Skills to Empower Digital Leadership series 1: Foundation of Digital Leadership – Adapting to Digital Transformation in Banking	May 20, 2025	BNI
Digital Trends and Skills to Empower Digital Leadership series 2: Strategic Digital Leadership – Mastering Digital Leadership: Digital Marketing & Business Growth Optimization	June 17, 2025	BNI
Digital Trends and Skills to Empower Digital Leadership series 3: Leading Team – Driving Digital Transformation	July 23,2025	BNI
Socialization of the Corruption Prevention and Governance Improvement Desk	July 24, 2025	Kemenko Polkam Coordinating Ministry for Politics and Security
Compliance Forum: Decision Making Based on the Business Judgement Rule Principle in the Context of Good Corporate Governance and Anti-Corruption	September 16, 2025	BNI and the Corruption Eradication Committee
Webinar Series Leadership Accelerator Essentials: Growing Your Business: "Elevating Business Performance Through Market Expansion"	December 19, 2025	BNI

Type of Training and Competency Development/Training Materials	Date of Implementation	Organizer
Focus Group Discussion (FGD) Mengenai Isu Implementasi Undang-Undang Pelindungan Data Pribadi di Sektor Jasa Keuangan Focus Group Discussion (FGD) on the Implementation of the Personal Data Protection Law in the Financial Services Sector	December 4, 2025	OJK
Webinar Series Leadership Accelerator Essentials: Operational Risk – Protecting The Organization Through Effective Risk Governance	December 22, 2025	BNI
Webinar Series Leadership Accelerator Essentials: Servant Leadership – Inspiring People Through Service & Authenticity	December 23, 2025	BNI

Composition of Human Resources and Professional Certifications in the Compliance Unit

In 2025, the number of employees in BNI's Compliance Unit (SKK) totaled 49 (forty-nine) personnel, including the Head of the Compliance Unit. SKK employees have obtained certifications in Compliance, Risk Management, and Governance, Risk & Compliance (GRC), as outlined below:

Certification Type	Resources
Risk Management Certification	46
Compliance Certification	39
Governance, Risk & Compliance (GRC) Certification	3
Data Protection Officer Certification	6
Certified Chief Compliance Officer	1

Training and/or Competency Development of the Compliance Unit in 2025

The Compliance Division is committed to continuously enhancing the competency and capability of each employee in the field of Compliance. In 2025, various competency development programs have been designed for Compliance Division employees, with the implementation details outlined in the following table:

Competency Development Material	Implementation Date	Organizer
Webinar with the theme: How to Achieve Peak Performance in 2025	January 2025	OJK
Webinar with the theme: Digital Transformation Technology Innovation Trends in the Financial Sector	January 2025	OJK
Webinar with the theme: Next Level Integrated Credit Tool in Wholesale Banking	January 2025	BNI
Webinar with the theme: The Role of GRC in Increasing Investor Confidence and Financial Sector Stability	February 2025	OJK
Enhancement Skill for Compliance Officer (ESCO)	February 19-21, 2025	BNI
World Privacy Day Conference – Strengthening Our Privacy Culture	February 25, 2025	PRIVASIMU
Training with the theme: Policy on Writing Off Bad Loans for MSMEs and Observing the Perception of the Banking Industry by LPPI	March 2025	LPPI
Webinar The DNA of The DPO	March 2025	Robere & Associates
Beyond Compliance in 2025: Navigate Regulatory Shifts and Gain a Competitive Edge	March 21, 2025	Deloitte
Workshop on Identification of Suspicious Financial Transactions (ITKM) and Determination of Indications of Predicate Crimes (TPA)	April 16-17, 2025 May 7-8, 2025	FKDKP
Management Risk in Fintech Partnership: Ensuring Secure and Sustainability Channeling	April 28-29, 2025	BNI
Digital Trends and Skills to Empower Digital Leadership series 1: Foundation of Digital Leadership – Adapting to Digital Transformation in Banking	May 20, 2025	BNI
Commercial Credit Brevet (CAP) Batch 2/2025	June 02-15, 2025 June 10 – July 8, 2025	BNI
Digital Trends and Skills to Empower Digital Leadership series 2: Strategic Digital Leadership – Mastering Digital Leadership: Digital Marketing & Business Growth Optimization	June 17, 2025	BNI
Webinar on the Implementation and Role of the Financial Industry in Business and Human Rights	July 17, 2025	BNI
Webinar Building The Global Sustainable Islamic Finance Ecosystem	July 24, 2025	BNI
Digital Trends and Skills to Empower Digital Leadership series 3: Leading Team – Driving Digital Transformation	July 23, 2025	BNI

Competency Development Material	Implementation Date	Organizer
Socialization of the Corruption Prevention and Governance Improvement Desk	July 24, 2025	Coordinating Ministry for Politics and Security
Cybersecurity Training Program - Cybersecurity for DPOs	July 26, 2025	BNI University & Cyber Foster Children
Evaluasi Kinerja Pasar dan Strategi Investasi Kedepan	August 7, 2025	BNI
Webinar Risk and Governance Summit 2025: Empowering The GRC Ecosystem to Drive Economic Growth and National Resilience	August 19, 2025	BNI
Learning Path BNI Cybersecurity Awareness	August 25 – September 25, 2025	BNI
FKDKP Seminar: Together, Eradicate Judol Practices for a Better Indonesia	August 29, 2025	FKDKP
Compliance Forum: Decision Making Based on the Business Judgement Rule Principle in the Context of Good Corporate Governance and Anti-Corruption	September 16, 2025	BNI and the Corruption Eradication Committee
Socialization of the Compliance Assessment Report (LHPK) of Bank Indonesia's Payment System and Financial Market Infrastructure and the National Blacklist Management Office (SP & FMI BI and KPDHN) in 2025	November 26, 2025	BI
Focus Group Discussion (FGD) on the Implementation of the Personal Data Protection Law in the Financial Services Sector	December 4, 2025	OJK
Refreshment Asset Liability Management + ILAAP	December 6-7, 2025	BNI
Risks & Frauds in International Trade & Mitigation of The Risks	December 9, 2025	BNI
Public Training on Regulatory Compliance & Fraud Risk in Corporate Actions	December 11-12, 2025	Ntrinsics
Webinar Series Leadership Accelerator Essentials: Growing Your Business: " Elevating Business Performance Through Market Expansion"	December 19, 2025	BNI
Webinar Series Leadership Accelerator Essentials: Operational Risk – Protecting The Organization Through Effective Risk Governance	December 22, 2025	BNI
Webinar Series Leadership Accelerator Essentials: Servant Leadership – Inspiring People Through Service & Authenticity	December 23, 2025	BNI
Personal Data Protection Refreshment – Privacy by Design & Privacy by Default Training	December 18, 2025	BNI
Personal Data Protection Refresher – Transfer Impact Assessment (TIA) & Legitimate Interest Assessment (LIA) Training	December 19, 2025	BNI

The Compliance Division also conducts internal sharing sessions for all employees.The topics covered in these sessions include the following:

Internal Sharing Material	Implementation Date
Socialization of tax fines and counterfeit money	January 2, 2025
Socialization of the PDP Law regarding the acceleration and adjustment of PKS to the PDP Law	• January 9, 2025 • January 13, 2025 • January 14, 2025 • February 27, 2025 • March 17, 2025 • April 23, 2025 • April 25, 2025 • May 22, 2025 • August 12, 2025 • August 28, 2025 • September 4, 2025
Sharing GRC and Compliance Index (CIX) materials at the W17 Business Meeting	January 9, 2025
Implementation of the PDP Law - Auditor Refreshment 2025	January 14-17, 2025
Sharing related to BNI advertising materials	January 30, 2025

Internal Sharing Material	Implementation Date
Socialization of Gratification and Anti-Bribery Control Systems	• January 31, 2025 • February 13, 2025 • February 14, 2025 • February 17, 2025 • March 5, 2025 • March 6, 2025 • March 10, 2025 • March 17, 2025 • March 24, 2025 • March 25, 2025 • April 14, 2025 • May 27, 2025 • July 2, 2025 • July 11, 2025 • September 20, 2025

Internal Sharing Material	Implementation Date
Socialization of APU PPT and PPPSPM	• January 31, 2025 • February 7, 2025 • February 17, 2025 • June 18, 2025 • July 11, 2025 • July 23, 2025 • July 24, 2025 • August 1, 2025 • August 11, 2025 • August 12, 2025 • August 27, 2025 • August 28, 2025 • September 8, 2025 • September 9, 2025
Data Cleansing Socialization	February 17, 2025 - June 9, 2025
Finalization of Record of Processing Activities (RoPA) and Data Protection Impact Assessment (DPIA) related to the Personal Data Protection Law	February 26, 2025
Socialization of Gratuity Control during Eid al-Fitr and reminder of tax reporting in Region 11	March 23, 2025
Socialization regarding the prohibition on sharing BNI ICONS application passwords in the Sharing Awareness, Operational & Services (SARAPAN) program	April 17, 2025
The sharing session discussed OJK's recurring findings and findings that could potentially result in SLIK fines and APU PPT findings.	April 20, 2025
Socialization with Bank Secrecy material	May 8, 2025
Socialization of the importance of reporting gratification and fraud awareness	May 20, 2025
Socialization of bank secrecy, PDP Law and bank obligations regarding check/BG transactions for LTKT reporting	May 21, 2025
Smart Forum Region 06 with the topic Compliance Index	July 16, 2025
Socialization of CDD and EDD Data Filling for PPATK's Temporary Suspension of Dormant Accounts and PPATK's Hensem Account Unblocking Mechanism	• July 25, 2025 • July 28, 2025 • August 4, 2025 • August 5, 2025
Implementation of the PDP Law during Division Quality Month WVC, COB3; CMP	• July 30, 2025 • May 9, 2025 • October 23, 2025
Delivery of Good Corporate Governance (GCG) material at BINA BNI training	• August 11, 2025 • September 9, 2025
Socialization of PDP core failure, bank secrets, lessons learned from PDP case	• August 14, 2025 • September 9, 2025
Data Quality Update Socialization	• August 11, 2025 • September 8, 2025

Implementation of the 2025 Compliance Work Unit Work Program

The work program of the Compliance Work Unit in 2025 was implemented in accordance with the principles of prudence, a culture of compliance, and risk mitigation to support the achievement of the Bank's strategic objectives. In its implementation, the Compliance Work Unit focuses on strengthening the functions of supervision, control, and fostering a culture of compliance across all work units. In accordance with POJK No. 46/POJK.03/2017 concerning the Implementation of the Compliance Function of Commercial Banks, an increase in the role and function of compliance is needed to ensure regulatory compliance and more effective risk management.

The compliance programs are as follows:

1. Realizing the implementation of a culture of compliance at all levels of the bank's organization and business activities:
   a. Training/Socialization to all employees, which includes material on Compliance Culture, Good Corporate Governance (GCG), Gratification Control and Anti-Bribery through digital and classical media, as well as implementing mandatory e-learning;
   b. Submission of Compliance Reminder (CORE) and implementation of the Daily Exercise Employee Program (DEEP46) with material related to the compliance function on a regular basis;
   c. Implementation of supervision both on-site and off-site related to the implementation of APU PPT and PPPSPM and the implementation of the GRC Forum (Governance, Risk, and Compliance);
   d. Gratification Control in the BNI work environment in collaboration with the Corruption Eradication Commission (KPK);
   e. Monitoring regarding the effectiveness of the implementation of Good Corporate Governance and Integrated Governance at BNI;
   f. Development of a system application in the form of a Compliance Information Management System (CIMS), which is an information system,database,and monitoring of the results of compliance reviews and implementation of APU PPT and PPPSPM online;
   g. Compliance Index (CIX) measurement as a reference for measuring and ensuring that the implementation of the compliance function is running well.

2. Manage compliance risks faced by the Bank. Several steps taken to minimize Compliance Risk include:
   a. Carrying out periodic identification monitoring, and socialization regarding the fulfillment of obligations and matters prohibited by regulations as a preventive measure;
   b. Remind organizational units that are in-charge units to fulfill obligations periodically;
   c. Create corrective actions based on the Compliance Risk database;
   d. Monitoring and supervising corrective actions taken by the responsible unit to reduce compliance risks;
   e. Including sanctions from regulators/ supervisors, which are one source of compliance risk, into the Compliance Index, as well as making the Compliance Index a Key Performance Indicator (KPI) unit.

3. Ensure that the policies, provisions, systems, procedures and business activities carried out by the Bank are in accordance with the provisions of the Financial Services Authority (OJK)/ Bank Indonesia (BI) and applicable laws and regulations.

   As a preventive measure to prevent Compliance Risk and support healthy and sustainable growth, the Compliance Division carries out preventive (ex-ante) efforts through compliance tests. This compliance test aims to ensure that all internal regulations and certain banking activities comply with applicable banking standards. The compliance testing activities include the following:
   a. Test compliance with new or updated draft policies, systems and procedures;
   b. Compliance test/review of existing policies, systems and procedures;
   c. Compliance testing of publishing plans or new product developments;
   d. Compliance checklist for assessing the ability and suitability of prospective Controlling Shareholders, members of the Board of Directors, and/or members of the Board of Commissioners;
   e. Compliance test/Credit Compliance Review (C2R) on the proposed Credit Application Tool (PAK);
   f. Compliance test/Procurement Compliance Review (PCR) on proposed Goods and/or Services Procurement Documents;
   g. Compliance testing/review of Bank Office network establishment and relocation planning (Regional Offices, Branch Offices, Sub-Branch Offices, and Functional Offices);
   h. Compliance test/review of Branch and Center operational activities.

4. Ensure that BNI complies with the commitments made with the Financial Services Authority (OJK), Bank Indonesia (BI), and other competent supervisory authorities. Monitoring of this commitment is carried out collaboratively with the Internal Audit Unit (IAD) to ensure that all Bank actions and policies are in line with the regulations and agreements set by the supervisory authority.

5. The implementation of compliance tests/ Credit Compliance Review (C2R) carried out by the Compliance Division aims to ensure the effectiveness of implementing compliance controls in all work units. Criteria for implementing C2R include the following aspects:
   a. Provision of new, additional, and restructuring funds with the authority of the Head Office Credit Committee (Corporate, Enterprise, and Commercial Segment) and Division Level Credit Committee (Commercial Segment); or
   b. Review of funding provision, where at least 1 (one) member of the Credit Committee is a Director;
   c. Modifications include, but are not limited to, changes in structure, release of collateral, and changes in conditions where at least 1 (one) member of the Credit Committee is a Director; or
   d. Proposals for providing funds must be reported with the Board of Commissioners or provision of funds to parties related to the Bank that must obtain approval from the Board of Commissioners.

6. Development of the BNI Anti Money Laundering (AML) system as an implementation of the Financial Services Authority Regulations (POJK) regarding the implementation of the APU PPT and PPPSPM programs.The development of this system includes the creation of a mechanism capable of automatically identifying, analyzing, and monitoring the characteristics of transactions carried out by customers. In addition, this system will also provide effective reports to support the monitoring and supervision of suspicious transactions, thereby reducing risks related to money laundering and terrorism financing.

Compliance Indicators for 2025

In 2025, BNI established a number of compliance indicators designed to monitor, evaluate, and improve compliance performance. The compliance indicators that will be applied are as follows:

1. Compliance Risk Profile
   Compliance risk profile assessment is carried out in a composite manner, which includes two main aspects: assessment of inherent risk and assessment of the quality of risk management implementation. The results of this assessment illustrate the effectiveness of the risk control system in ensuring compliance. In 2025, in composite terms, BNI's Compliance Risk Profile was at level 2, with the following details:
   a. BNI's Inherent Risk in 2025 was at level 2; (Low to Moderate);
   b. The Quality of Implementation of Risk Management (KPMR) was at level 2 (Satisfactory).

2. Compliance Index (CIX)
   Compliance Index is an assessment tool used to measure and ensure that the implementation of the compliance function in a unit is running well. In general, the CIX measurement results in 2025 were at the Moderate level.

Implementation of the Integrated ComplianceWork Unit Work Program in 2025

As a form of implementation of duties and functions to monitor and evaluate the implementation of compliance functions in each Financial Services Institution (LJK) in the BNI Financial Conglomerate (KK), during 2025 the BNI SKKT has carried out duties and functions including:

1. Analyzing the latest external provisions that have a significant impact and have major sanctions for LJKs in the BNI KK and submit them to the relevant LJKs for follow-up.
2. Aligning the internal policies of each LJK in the BNI KK and then provide the necessary input or recommendations while still paying attention to the business field, complexity, needs, size, conditions, and regulations that apply to each Member of BNI Financial Conglomerate.
3. Aligning the Compliance Risk management mechanism through monthly monitoring of the fulfillment of the Regulatory Business Conduct of each LJK in the BNI KK based on the regulations of each LJK using a Self-Assessment.
4. Conducting compliance reviews and provide compliance opinions on issues arising within the BNI Financial Conglomerate Members.
5. Implementing the Compliance Index (CIX) within the BNI Financial Conglomerate Members as a means of monitoring the implementation of the compliance function within the BNI Financial Conglomerate Members. This is achieved by using parameters such as fraud, violation cases, regulatory sanctions and fines, pending findings from external and internal auditors, customer data updates, and the Regulatory Business Conduct of each BNI Financial Conglomerate Member.

6. Conducting periodic reviews of the Compliance Function Implementation Reports of the BNI Financial Conglomerate Members.
7. Holding periodic meetings with each BNI Financial Conglomerate Member to discuss, among other things, compliance issues and follow-up on suggestions and advice from the BNI Board of Commissioners.
8. Making efforts to improve the competency of human resources in compliance units at BNI Financial Conglomerate Members through the holding of sharing sessions by BNI.
9. Conducting a Self Assessment of the implementation of Integrated Governance at the BNI Financial Conglomerate every semester to then be submitted to the OJK.
10. Compiling and reporting on the implementation of integrated compliance functions and responsibilities to the Director in charge of Compliance or the Director in charge of Financial Conglomerate Management.

Compliance Work Unit Work Plan for 2026

The Compliance Work Unit has developed a work plan based on an evaluation of the compliance function's effectiveness in 2025, the dynamics of applicable regulations, and the Board of Directors' strategic direction, to ensure the compliance function can contribute optimally to achieving business targets and mitigating risks.

The main focus of the 2026 work plan includes improving the internal control system, strengthening monitoring of operational compliance, and optimizing the reporting and handling processes for violations. In addition, the Compliance Work Unit will also strengthen its education and regulatory outreach programs for all employees to increase awareness and compliance with applicable provisions.

The work plan program details are as follows:
1. Enhancing compliance culture and human resource competency
2. Compliance risk management
3. Strengthening bank governance and integrated governance
4. Strengthening the compliance function infrastructure and systems
5. Managing gratification control and anti-bribery
6. Strengthening the implementation of the Data Protection Law.

Evaluation of the Effectiveness of the Compliance Function in 2025

In 2025, BNI conducted a comprehensive evaluation of the effectiveness of its compliance function to assess the extent to which the mechanisms, procedures, and oversight implemented supported the implementation of Good Corporate Governance (GCG) principles and mitigated compliance risks.

The evaluation process included a review of the internal control system, operational compliance monitoring, handling of violations, and the level of employee awareness and compliance with applicable regulations. The evaluation results indicated the extent to which the compliance function identified potential risks, provided recommendations for improvement, and ensured timely follow-up on compliance findings.

Furthermore, this evaluation assessed the compliance function's ability to support BNI's digital transformation, product innovation, and business expansion, ensuring compliance risks remain well managed despite dynamic changes in regulations and the business environment. The findings and recommendations from the 2025 evaluation serve as the basis for increasing the compliance function's capacity, refining procedures, and strengthening the organization's culture of compliance.

Based on the 2025 evaluation, the compliance function demonstrated strong performance in meeting regulatory requirements and internal regulations.



Internal Control System Objectives [ACGS D.3.17, D.3.18. D.3.19, D.3.20]

BNI has built a robust Internal Control System based on the COSO Internal Control – Integrated Framework, internationally recognized as one of the best frameworks for implementing internal control. This system serves as a compliance instrument and supports the sustainable achievement of the Bank's business objectives. The system's implementation is based on five main COSO components: control environment, risk assessment, control activities, information and communication, and monitoring activities.

The control environment is shaped by an organizational culture that emphasizes integrity, ethical values, and a commitment to good governance. Risk identification and assessment processes are conducted continuously to enable the Bank to anticipate changes in the business environment and regulations. Furthermore, control activities are designed to ensure that all policies and procedures are implemented consistently across all work units. The information and communication component plays a crucial role in ensuring the flow of appropriate, accurate, and relevant information to support decision-making. Meanwhile, monitoring activities are carried out continuously to assess the effectiveness of the system and ensure continuous improvement.

In addition to COSO, the implementation of the internal control system at BNI is also guided by the Financial Services Authority (SEOJK) Circular Letter No. 35/SEOJK.03/2017 concerning Guidelines for Internal Control System Standards for Commercial Banks (SEOJK 35/2017). This guideline aligns with the principles set out in the Committee of Sponsoring Organizations of the Treadway Commission's (COSO) Framework. [ACGS D.3.17]

As the Main Entity (dhi. PIKK) within the BNI Financial Conglomerate, the Bank runs an integrated control system with its subsidiaries to ensure the implementation of control functions is carried out in an integrated manner. The objective is to ensure that all operational activities within the BNI Financial Conglomerate run effectively, consistently, and in line with the principles of risk management and Good Corporate Governance (GCG). With this implementation, BNI not only meets the regulatory compliance aspect but also strengthens internal control as a foundation for operational resilience, accountability, and the creation of sustainable added value.

INTERNAL CONTROL SYSTEM OBJECTIVES

BNI's objectives for implementing an effective internal control system include, among other things, ensuring:

1. Compliance with statutory provisions and regulations (Compliance Objectives) is intended to ensure that all BNI business activitie are carried out in accordance with statutory provisions and regulations, both provisions issued by the government, the Financial Services Authority, and internal policies and procedures established by BNI; [ACGS C.2.6]
2. The availability of complete, accurate, appropriate, and timely financial and management information (Information Objectives) is intended to ensure the availability of complete, accurate, appropriate, and timely reports required for appropriate and accountable decision-making;
3. Effectiveness and efficiency in BNI's business activities (Operational Objectives) are intended to increase effectiveness and efficiency in the use of assets and other resources in order to protect BNI from the risk of loss; and
4. Increasing the effectiveness of risk culture in the BNI organization as a whole (Risk Culture Objective) is intended to identify weaknesses and assess deviations early and reassess the reasonableness of existing policies and procedures at BNI on an ongoing basis.

ACTIVE CONTROL AND SUPERVISION MECHANISM BY THE BANK'S MAIN ORGANS

BNI implements the Three Lines Model as an internal control framework integrated with risk management to strengthen reliable corporate governance. This model positions the first line (risk-taking unit) as the party primarily responsible for risk management and controlling daily operational activities. Furthermore, the second line (risk control unit) plays a role in formulating the risk management framework, policies, and methodology. Meanwhile, the third line (risk assurance unit) carries out independent assessment functions to ensure the effectiveness of internal control implementation throughout the organization. By implementing this model, BNI ensures clear coordination, strong accountability, and multi-layered oversight to support sustainable risk management and governance.

Active oversight by the Board of Directors and the Board of Commissioners is a crucial element in ensuring the adequacy and effectiveness of BNI's internal control system. The Board of Directors directly monitors the implementation of internal controls in daily operational activities, while the Board of Commissioners conducts periodic evaluations to ensure compliance with good governance principles. This oversight mechanism serves as the foundation for the implementation of integrated and sustainable controls.

As a follow-up to this oversight, and in accordance with the provisions of OJK Regulation No. 15 of 2024 concerning the Integrity of Bank Financial Reporting, BNI submits an internal control report as part of the financial reporting process. This report is included in the publication of the annual financial report and performance information, which is prepared in accordance with the provisions on transparency and publication of bank reports. Furthermore, the Board of Commissioners also submits the results of its oversight of the implementation of the bank's business plan through a business plan oversight report, in accordance with OJK regulations concerning bank business plans. Through this mechanism, BNI ensures accountability, transparency, and effective oversight in supporting corporate governance with integrity.

CONFORMITY OF BNI'S SPI WITH THE COSO FRAMEWORK [ACGS D.3.17]

In order to implement an effective Internal Control System (SPI), both for BNI individually and in a consolidated manner with its subsidiaries, BNI implements an internal control system that refers to the Internal Control – Integrated Framework developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO). This framework consists of five main components, namely:

1. Control Environment
2. Risk Assessment
3. Control Activities
4. Information and Communication
5. Monitoring Activities

These five components are integrated to ensure effective internal control, support good governance, and strengthen risk management across all BNI entities.

Throughout 2025, BNI consistently assessed the compliance of its internal control system implementation with the principles of the COSO Framework, as follows:

Components of Internal Control in Accordance with COSO Framework	Implementation of BNI's Internal Control System
1. Control Environment The commitment, behavior and steps taken by BNI's Board of Directors and Board of Commissioners have formed a solid control environment. This environment, in turn, becomes the basis for the implementation of effective operational control activities across all lines of management.	The main elements that make up BNI's control environment are: 1. Adequate organizational structure; 2. BNI leadership style and management philosophy; 3. Integrity and ethical values as well as employee competence; 4. Human resources policies and procedures; 5. Attention and direction from BNI Management and other committees, such as the Risk Management Committee; 6. External factors that influence BNI operations and the implementation of risk management.
2. Risk Assessment As an integral part of the internal control system, BNI carries out regular risk assessments. Several types of risks that have been identified are the main focus in this process. By measuring exposure to these risks, BNI can formulate appropriate mitigation strategies so that risks can be managed effectively and optimally.	Assessment of 8 (eight) types of risks that BNI must manage include: **1. Credit Risk Assessment** Credit Risk Assessment is conducted comprehensively, encompassing, among other things, the amount, quality, and composition of credit exposures on both the balance sheet and off-balance sheet accounts, the risk level of the debtor or counterparty, the characteristics of the credit portfolio, and the business and industry environment. Furthermore, the Credit Risk Assessment also considers the effectiveness of the Internal Rating System and Scoring System, the results of Credit Risk stress testing, and the use of internal ratings in determining asset quality and establishing allowances for impairment losses through the calculation of Expected Credit Loss (ECL). The ECL calculation is based on three main parameters: Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD), which serve as estimates of potential credit losses. **2. Market Risk Assessment** Market Risk Assessment is conducted across the entire trading book and banking book portfolios to ensure that market risk exposure is adequately managed. In the trading book, Market Risk assessment includes measuring market risk sensitivity using standard methods, risk aggregation using Value at Risk (VaR) based on internal models, conducting stress testing, monitoring budget losses, and backtesting to verify the reliability of the risk measurement model. Meanwhile, in the banking book, Market Risk assessment focuses on measuring interest rate risk and exchange rate risk, to assess the impact of changing market conditions on the Bank's overall financial position and performance.

Components of Internal Control in Accordance with COSO Framework	Implementation of BNI's Internal Control System
	3. Liquidity Risk Assessment Liquidity Risk Assessment is conducted to continuously measure and monitor net funding requirements to ensure the Bank's ability to meet its financial obligations. The Liquidity Risk Assessment includes an evaluation of key liquidity ratios, including the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR), asset and liability maturity profiles, and projected cash inflows and outflows. In addition, the Liquidity Risk Assessment also considers stress testing results, the availability of liquid assets such as cash and Secondary Reserves, and monitoring of other liquidity ratios to ensure the Bank's liquidity resilience in facing various market conditions. **4. Operational Risk Assessment** One of the methods used to assess operational risk at BNI is Risk Control Self-Assessment (RCSA), which is carried out periodically through a self-assessment process by work units, which aims to identify potential weaknesses in existing controls so that risks can be mitigated as early as possible. Operational risk assessment is also carried out through assessing the operational risk profile with indicators/parameters: a. Business Characteristics & Complexity b. Human Resources c. InformationTechnology and Supporting Infrastructure d. Fraud e. External Events **5. Legal Risk Assessment** Legal Risk Assessments are conducted to identify and quantify potential losses arising from legal aspects of the Bank's activities. Legal Risk Assessments include, among other things, potential losses from litigation, weaknesses in agreements or contracts, and risks arising from the absence or changes in regulations and legislation that form the basis for the Bank's products and services. **6. Strategic Risk Assessment** The Strategic Risk Assessment is conducted to assess the Bank's strategy's alignment with the dynamics of the business environment and BNI's competitive position. This assessment includes an evaluation of the level of risk of the implemented strategy, BNI's business position compared to competitors, and the achievement of the Bank's Business Plan (RBB). **7. Compliance Risk Assessment** Compliance Risk Assessments are conducted to measure the Bank's level of compliance with applicable laws and regulations. These assessments cover the type, significance, and frequency of regulatory violations, including violations of specific financial transactions, as well as BNI's compliance track record as an indicator of the quality of its Compliance Risk management. **8. Reputational Risk** A Reputational Risk Assessment is conducted to measure the potential for a decline in stakeholder trust due to negative perceptions of the Bank. This assessment includes the impact on the reputation of owners and related parties, compliance with business ethics, the complexity of products and business partnerships, and the frequency and materiality of negative press and customer complaints.
3. Control Activities Control activities are an important component to ensure the achievement of organizational goals through risk control. These control activities include implementing policies and procedures designed to reduce risks that could hinder the achievement of organizational goals.	To ensure effective business risk management, BNI implements control activities as part of an integrated Internal Control System. **1. General Control Activities** Control activities are carried out by all BNI employees, including the Board of Directors, to ensure consistent implementation of management policies and directives. Controls are outlined in clear policies and procedures to ensure operational effectiveness and anticipate risks inherent in all business activities. **2. Control Activities according to Organizational Functions** The Internal Control System is supported by a control structure that is aligned with the organizational structure, so that control is carried out according to the functions, authorities, and responsibilities of each work unit, and ensures that the separation of duties and supervisory mechanisms run adequately.

Components of Internal Control in Accordance with COSO Framework	Implementation of BNI's Internal Control System

a. **Management Reviews (Top Management Reviews)**
The Board of Directors actively conducts reviews through presentation materials and periodic performance reports to evaluate target achievement and early detection of potential problems, including control weaknesses, reporting inaccuracies, and indications of fraud. Target setting is carried out in accordance with established risk management policies, risk appetite, risk tolerance, and limits.

b. **Operational Performance Review (Functional Reviews)**
Operational performance reviews are conducted periodically by the Internal Audit Unit to ensure the effectiveness of control implementation and compliance with policies and procedures.

c. **Information Systems Control**
Information system controls are carried out to ensure the accuracy, completeness, and authorization of transactions, as well as the effectiveness of general controls and application controls.

d. **Control of Physical Assets**
Physical asset control includes securing assets and restricting access to systems, devices, and data to prevent misuse.

e. **Documentation**
BNI ensures the availability of adequate documentation on policies, procedures, systems, accounting standards, and audit processes as part of strengthening the Internal Control System.

3. **Control Activities according to RiskType**
BNI implements risk control activities outlined in policies and procedures to ensure effective and consistent risk management across all major risk types, including credit, market, liquidity, operational, legal, compliance, reputational, and strategic risks. Risk control is implemented as follows:

a. **Credit Risk Control**
Credit Risk Control is carried out through comprehensive supervision of all credit activities and the implementation of internal credit controls to ensure that asset quality is maintained.

b. **Market Risk Control**
Market Risk Control is carried out through a process of risk identification and measurement by a unit independent of the business function, namely the Risk Management Work Unit, to ensure the objectivity and accuracy of risk management.

Components of Internal Control in Accordance with COSO Framework	Implementation of BNI's Internal Control System
	c. Operational Risk Control BNI has comprehensive policies and procedures for all existing work units and products/activities to ensure operational activities can be carried out appropriately and consistently by the entire organization. BNI also has complete and trained organs to ensure that control activities can be carried out prudently through the application of the principles of segregation of duties, dual control, maker-checker, and other control principles. BNI has a comprehensive process in the process of launching new products/activities so as to ensure that the products/activities launched have an adequate control process foundation for their operationalization. With the development of technology, many control activities have also been automated so that operational risks can be minimized. Apart from the above, BNI has also implemented Risk Control Self-Assessment activities with a Control Testing approach/method, which is carried out periodically to ensure that the control activities that have been designed have been implemented well and are still adequate over time. BNI has several special work units that are independent from the process owner and will carry out Control Testing so that identification of potential control weaknesses can be carried out more focused and independently. Every potential gap found will be followed up and monitored to ensure operational risks can be minimized. Through strong governance, BNI ensures that there is an oversight process from the independent Risk Management Work Unit, Internal Audit as the third line, and also monitoring carried out by the Board of Directors and Board of Commissioners through various committees such as the Risk Management Committee, Risk Monitoring Committee, etc. This also ensures that the operational risk control process has been carried out according to what has been determined and potential problems have been handled appropriately. In addition, to anticipate crisis conditions or natural disasters, BNI has established a Business Continuity Management process that is equipped with the necessary policies, procedures, and organs to ensure that crisis or disaster conditions are handled properly so that business continuity is maintained. The necessary protocols have been built, and trials are carried out periodically to always ensure the readiness of the established plans. **d. Liquidity Risk Control** Liquidity Risk Control is carried out through monitoring the liquidity position and Secondary Reserve based on a traffic light system, as well as implementing funding strategies and managing assets and liabilities in accordance with global funding policies and Asset and Liability Management. **e. Legal Risk Control** Legal Risk Control is carried out by ensuring that agreements and contracts with third parties protect BNI's interests, through legal reviews of new products and activities, providing legal advice and assistance, and regular reviews of existing agreements. **f. Strategic Risk Control** Strategic Risk Control is carried out through periodic policy reviews and strategy implementation, including evaluation of the achievement of the Bank Business Plan (RBB) through management forums and testing of the management information system. **g. Compliance Risk Control** Compliance Risk Control is carried out preventively to ensure that all BNI policies, systems, procedures and business activities are in accordance with regulatory provisions and established commitments. **h. Reputation Risk Control** Reputational Risk Control is carried out through timely management and resolution of customer complaints and lawsuits, as well as strengthening control mechanisms to maintain stakeholder trust.

Components of Internal Control in Accordance with COSO Framework	Implementation of BNI's Internal Control System
4. **Information and Communication** Information and communication are critical elements that ensure the flow of relevant and high- quality information across all levels of the organization. Accurate and timely information must be available to stakeholders to support decision making and implementation of control activities. Through an effective information system and open communication channels, the Bank can ensure that risks can be identified and responded to appropriately, as well as facilitate the implementation of integrated controls.	In the Internal Control System, BNI's information system is designed to produce relevant and reliable reports regarding operational activities, financial condition, risk management implementation, and compliance with applicable regulations. This information supports the Board of Directors and Board of Commissioners in carrying out their management and supervisory functions effectively. The information presented includes internal and external data required by management to evaluate the achievement of the Bank's objectives and is delivered accurately and timely to support decision-making and the effective and efficient implementation of responsibilities. To maintain system reliability and continuity, BNI maintains a Management Information System, both electronic and non-electronic, equipped with a contingency recovery plan and backup system to minimize the risk of operational disruptions and maintain business continuity. To ensure all employees understand and comply with applicable policies and procedures, BNI provides effective internal communication channels to convey information and work guidelines. Through effective internal communication, each employee is expected to carry out their duties and responsibilities in accordance with established standards. Furthermore, BNI also manages external communication channels to convey relevant information to shareholders, regulators, customers, and other third parties in an accurate and transparent manner. In processing electronic information, BNI ensures that the systems used are equipped with an adequate audit trail. This audit trail serves to support oversight, transparency, and accountability, ensuring that every transaction or data change can be clearly and reliably traced.
5. **Monitoring Activities** Monitoring Activities Are components that aim to assess the effectiveness of internal control on an ongoing basis and perform adjustments if necessary. These activities ensure that internal controls remain effective in reducing risks and achieving organizational objectives.	Monitoring of BNI activities, both in business units and functional units, is carried out using a three-lines model approach.This approach ensures comprehensive and layered risk control.

FINANCIAL AND OPERATIONAL CONTROL AND COMPLIANCEWITH LEGISLATION [ACGS: D.3.19]

BNI Financial and Operational Control

BNI implements comprehensive control activities through the establishment of clear policies and procedures, as well as an early verification process to ensure consistent implementation across all levels of the organization. These control mechanisms are aligned with BNI's organizational structure, creating a comprehensive and integrated internal control framework.

BNI's internal controls encompass both financial and operational controls, including compliance with applicable laws and regulations. Financial controls focus on ensuring all transactions are executed in accordance with internal regulations and procedures, resulting in accurate, reliable, and transparent financial reports. Meanwhile, operational controls are aimed at improving the efficiency and effectiveness of business processes in supporting the achievement of the company's strategic objectives. These two aspects complement each other as the foundation for the implementation of good and sustainable corporate governance.

As part of internal control, BNI implements segregation of duties to minimize the risk of irregularities and conflicts of interest, supported by an integrated accounting and information system that enables timely financial recording and reporting. Routine monitoring of financial and operational activities is conducted to detect potential discrepancies, which are followed up with corrective measures to ensure control effectiveness is maintained.

Controlling Compliance with Other Laws and Regulations

To protect BNI from legal risks, the Compliance Function conducts comprehensive monitoring of the compliance of banking operations with internal policies, regulations, systems, and procedures, as well as applicable laws and regulations. In carrying out its duties, the Compliance Function reports directly to the Director in charge of compliance.

COMPLIANCE WITH OJK REGULATION NO.35/SEOJK.03/2017 CONCERNING INTERNAL CONTROL STANDARD GUIDELINES FOR COMMERCIAL BANKS

BNI ensures that all operational and financial activities are carried out in accordance with the internal control principles as stipulated in OJK Regulation No. 35/SEOJK.03/2017. These provisions serve as a reference in the design, implementation, and monitoring of the Internal Control System to maintain regulatory compliance, increase accountability, and mitigate operational and financial risks.

The implementation of internal control includes a clear organizational structure, segregation of duties, standard operating procedures, an integrated information system, and an accurate and transparent reporting mechanism. The effectiveness of internal control is evaluated periodically through internal audits, ongoing monitoring, and follow-up on findings and potential deviations, to ensure that internal control operates effectively and sustainably.

REVIEW OF THE EFFECTIVENESS OF THE INTERNAL CONTROL SYSTEM [ACGS D.3.18]

Throughout 2025, BNI consistently strengthened the implementation of its Internal Control System (ISC) as part of its efforts to maintain business continuity and improve the quality of corporate governance. The ISC was implemented comprehensively across all organizational lines, adhering to prudent principles and best practices in the banking industry.

The evaluation results indicate that BNI's ISC effectively supported the achievement of the Bank's objectives, from operational, financial, and compliance perspectives. This effectiveness is reflected in the maintained integrity of financial reports, increased operational efficiency and effectiveness, and the ISC's ability to mitigate compliance and legal risks, while strengthening the risk and control culture across all work units.

Internal monitoring and audits also indicated that any remaining control weaknesses were minor and have been addressed through measurable improvement plans. In line with technological advancements, BNI continues to refine its ISC through the use of digitalization, big data analytics, and an Audit Management System (AMS) to increase the speed, accuracy, and consistency of monitoring. Therefore, overall, BNI's ISC in 2025 is considered to provide sufficient assurance regarding the achievement of the Bank's objectives, regulatory compliance, and business sustainability.

STATEMENT OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS ON THE ADEQUACY OF THE INTERNAL CONTROL SYSTEM

[ACGS D.3.18, D.3.20]

The Board of Directors and Board of Commissioners of BNI are confident that the implementation of the Internal Control System (SPI) throughout 2025 has been adequate and effective, and in line with the complexity of the Bank's business activities and risk levels. The SPI is considered capable of providing sufficient assurance in maintaining the reliability of financial reports, ensuring compliance with applicable laws and regulations, and supporting effective and efficient operational implementation amidst the ever-evolving dynamics of the financial industry.

BNI's Internal Audit Unit (IAU) is supported by ongoing monitoring and evaluation mechanisms through internal oversight and external audit functions. Any identified control weaknesses are addressed in a timely manner through measurable improvement plans, ensuring they do not disrupt the achievement of the Bank's objectives and business continuity.

In line with the commitment to continuous improvement, the Board of Directors and Board of Commissioners ensure that the IAU continues to be refined to remain relevant, adaptive, and reliable, including through the utilization of technology and strengthening of a culture of control. Thus, the IAU is expected to support risk management and the achievement of BNI's strategic objectives sustainably going forward.

INTERNAL CONTROL IN THE FINANCIAL REPORTING PROCESS

The implementation of internal control over financial reporting at BNI is carried out to ensure the availability of reliable, accurate, complete, appropriate, and timely financial information and reports. The implementation of internal control over financial reporting refers to the following provisions:

1. Financial Services Authority Regulation Number 15 of 2024 concerning the Integrity of Bank Financial Reporting, which aims to strengthen the accuracy, reliability, and transparency of financial information and bank financial reports, while ensuring that the financial report preparation process is supported by effective internal controls.
2. Decree of the Deputy for Finance and Risk Management of the Ministry of State-Owned Enterprises Number SK-5/DKU.MBU/11/2024 concerning Technical Instructions for Internal Control Over Financial Reporting (ICOFR) of State-Owned Enterprises (SK-5 KBUMN) as a mandatory guideline for SOEs in ensuring the integrity and reliability of financial information and financial reports.

As a guideline for implementing ICOFR, BNI has established the following Policies and Procedures:

1. The Bank's Financial Reporting Integrity Policy, which is part of the General Policy on Internal Control Systems (KUSPI).
2. The Bank's Financial Reporting Integrity Procedure.

In addition, in accordance with POJK Number 15 of 2024, BNI has established a Second Line ICOFR Special Work Unit (UKK ICOFR) as part of the Operational Risk Management Division, responsible for coordinating the implementation of ICOFR at BNI.

To comply with POJK Number 15 of 2024 and SK-5 KBUMN, and in line with the principles of internal control over financial reporting, BNI implements an ICOFR framework consisting of the following five (5) stages:

1. Design
   The design stage defines the scope of the ICOFR, including:
   a. Determining materiality, including Overall Materiality and Performance Materiality.
   b. Determining significant accounts and significant financial statement disclosures.
   c. Determining significant locations/companies.
   d. Determining significant business processes.
   e. Determining significant applications.
   f. Preparing Business Process Mapping (BPM) and Risk Control Matrices (RCM):
      - Entity Level Control (ELC).
      - Transaction Level Control (TLC).
      - IT General Control (ITGC).

   The entire BPM and RCM are prepared by the First Line (Business Process Owner) together with the Senior Operational Risk Executive (SORX) and validated by the Second Line (UKK ICOFR).

2. Implementation and Continuous Monitoring
   The results of the Second Line (UKK ICOFR) validation of the BPM and RCM are then subjected to a Control Self-Assessment (CSA) by SORX together with the First Line, and the results are evaluated by the Second Line (UKK ICOFR).

3. Evaluation
   The Third Line, in this case, Internal Audit conducts an evaluation using the Test of Design (TOD) and Test of Operating Effectiveness (TOE) methods on the controls previously subjected to a Control Self-Assessment (CSA) by SORX together with the First Line, and the CSA evaluation by the Second Line (UKK ICOFR).

4. Remediation
   All ineffective controls during the design validation, Control Self-Assessment (CSA), and Evaluation processes are remediated by the First Line. Remediation is performed for operational and design deficiencies.

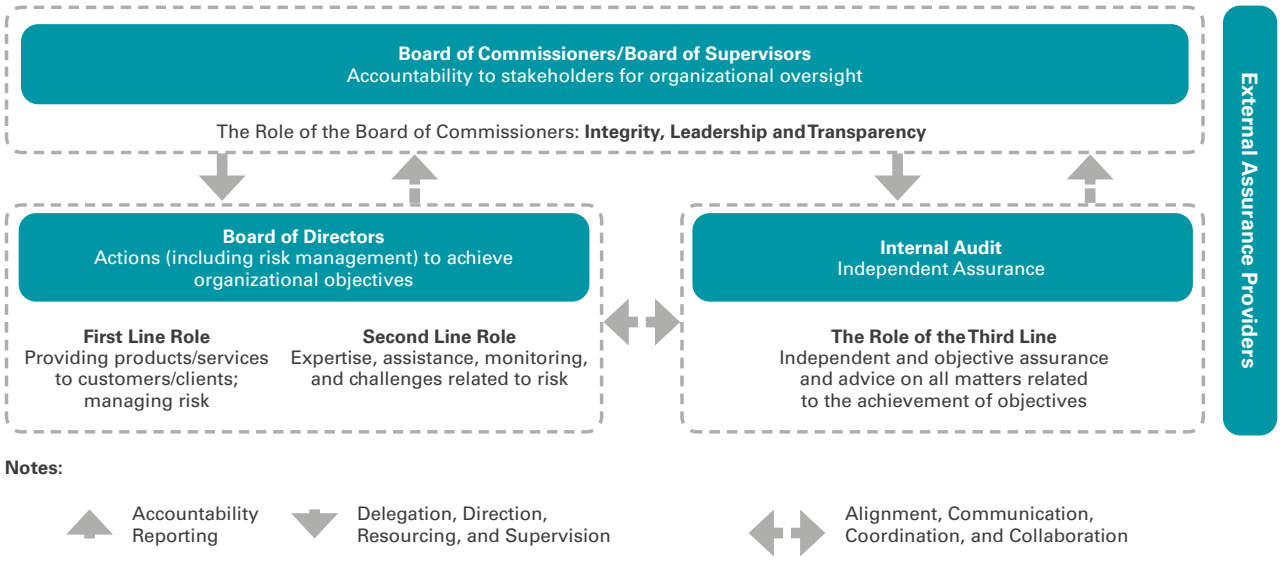
5. Reporting
   Reporting regarding Internal Control over Financial Reporting is submitted to the following parties:

Report Name	Report Recipient	Frequency	Regulations
Results of the Board of Commissioners' Supervision in the Business Plan Supervision Report	OJK	Semester	POJK Number 15 of 2024
Internal Control Report in Bank Financial Reporting Process	OJK (through Annual Report)	Annual	POJK Number 15 of 2024
Management Assessment Report	BP BUMN	Annual	SK-5/DKU.MBU/11/2024 BP BUMN
State-Owned Enterprises ICOFR Implementation Monitoring Report	BP BUMN	Quarterly	SK-5/DKU.MBU/11/2024 BP BUMN

If, at the end of the financial reporting period, ineffective controls remain, whether based on the CSA conducted by SORX in conjunction with the First Line, the CSA evaluation conducted by the Second Line (UKK ICOFR), or the evaluation conducted by the Third Line, BNI determines the level of deficiency in these ineffective controls. The impact of these ineffective controls on the financial statements is measured and categorized into 3 (three) categories:
a. Control Deficiency
b. Significant Deficiency
c. Material Weakness

In implementing the five stages mentioned above, BNI involves three lines in accordance with the Three Line Model, as follows:

The Three Lines Model



Source: The Institute of Internal Auditors Indonesia - IIA Three Lines Model 2020, Update to the Three Lines of Defense Model.

As a result of implementing the five stages mentioned above, BNI has achieved, among other things:
a. Identification of risks related to financial reporting and key controls in significant business processes to mitigate these risks.
b. Testing of all key controls.
c. Testing compliance with internal policies and procedures.
d. Review of the feasibility and effectiveness of information technology controls.

MANAGEMENT REPORT ON INTERNAL CONTROL IN THE FINANCIAL REPORTING PROCESS

The BNI Board of Directors is responsible for implementing adequate internal controls in the financial reporting process, which are supervised by the Board of Commissioners through the Audit Committee, and implemented by all levels of BNI management and employees to provide reasonable assurance regarding the integrity, reliability, accuracy, and consistency of the Bank's Financial Information and Financial Reports.

Internal controls in BNI's financial reporting process aim to:
1. Ensure the truthfulness, accuracy, and transparency of Financial Information and Financial Reports.
2. Improve operational efficiency and effectiveness in the financial reporting process.
3. Ensure compliance with laws and regulations in the financial reporting process.
4. Ensure that the Financial Reports have been prepared in accordance with financial accounting standards and the Financial Services Authority's regulations regarding the recording of financial transactions.

BNI's internal controls and financial reporting processes are periodically evaluated in accordance with Financial Services Authority Regulation No. 15 of 2024 concerning the Integrity of Bank Financial Reporting, and guided by Decree of the Deputy for Finance and Risk Management of the Ministry of State-Owned Enterprises No. SK-5/DKU.MBU/11/2024 concerning Technical Instructions for Internal Control over Financial Reporting (ICOFR), to ensure their effectiveness as part of the implementation of good bank governance.

Due to inherent limitations, internal controls over financial reporting are designed to provide reasonable assurance, not absolute assurance, and therefore cannot fully guarantee the prevention or detection of misstatements. Therefore, BNI's Board of Directors is committed to continuously strengthening its control culture, improving the quality of monitoring, and ensuring consistent follow-up on findings.

The BNI Board of Directors has completed an assessment of the effectiveness of internal control in BNI's financial reporting process for the year ending December 31, 2025. In conducting this assessment, BNI referred to the basic principles of the "Internal Control - Integrated Framework" issued by the Committee of Sponsoring Organizations of the Treadway Commission ("COSO").

Based on this assessment, the BNI Board of Directors concluded that internal control in the financial reporting process for the period ending December 31, 2025, was effective. Furthermore, based on management's assessment, the Company determined that there were no material weaknesses in internal control over financial reporting as of December 31, 2025.

Therefore, this report is prepared as a demonstration of the accountability and commitment of the BNI Board of Directors to maintaining the integrity of the Company's financial reporting process.

Risk Management System [ACGS D.3.17, D.3.18, D.3.19, D.3.20]

OVERVIEW OF BNI'S RISK MANAGEMENT SYSTEM

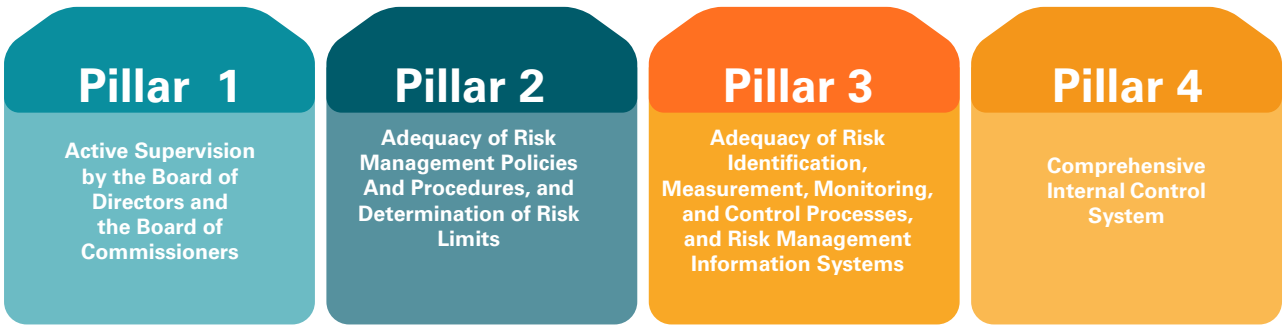
BNI implements a risk management system as a crucial component of maintaining business sustainability and ensuring the application of prudent principles across all business activities. The risk management framework is designed to offer guidelines for all work units and entities within the Financial Conglomerate to run consistent, proportionate risk management aligned with their respective business profiles and regulatory compliance. With this framework, BNI ensures that potential risks are adequately identified and evaluated, and that the Company can adapt to market dynamics, technological developments, regulatory changes, and evolving business strategies.

In practice, BNI continues to enhance its risk management capabilities through a more proactive and forward-looking approach. BNI exerts this effort by aligning risk appetite with business growth direction, strengthening its three lines of control, developing more comprehensive risk measurement and monitoring tools, and harmonizing risk management at both the Bank and subsidiary levels. These measures allow BNI to keep its risk profile within acceptable limits while helping deliver healthy performance, business sustainability, and resilience for the financial conglomerate amidst a dynamic environment.

SCOPE OF BNI'S RISK MANAGEMENT

As part of its commitment to preserving business continuity and upholding prudential principles, BNI implements comprehensive risk management through a structured and integrated framework. This approach is designed to ensure that every business activity operates in a controlled manner, aligned with corporate strategy and responsive to the constantly evolving dynamics of the banking industry. Supported by strong governance, a disciplined risk culture, and adequate infrastructure and methodologies, BNI is able to anticipate potential risks while capitalizing on emerging opportunities.

The Bank's risk management framework extends beyond risk measurement and monitoring, encompassing effective control and mitigation measures to minimize potential adverse impacts on corporate performance. All processes are implemented proactively and with a forward-looking orientation, leveraging technology, data analytics, and synergy across entities within the financial conglomerate. In doing so, BNI maintains an optimal balance between risk management and business target achievement, supports healthy and sustainable growth, and delivers long-term value to shareholders — all within the parameters of the established risk appetite and risk tolerance. This entire implementation is underpinned by four core pillars of risk management, which collectively form the foundation for a resilient and sustainable risk management system.



PILLAR 1. ACTIVE SUPERVISION BY THE BOARD OF DIRECTORS AND THE BOARD OF COMMISSIONERS

Board of Directors' Oversight [ACGS D.3.18]

The active oversight of BNI's risk management by the Board of Directors covers the following:

1. Preparing written, comprehensive risk management policies, strategies, and frameworks — including overall risk limits and limits by risk type — by taking into account the level of risk to be assumed (risk appetite) and risk tolerance, in line with economic conditions and BNI's circumstances, as well as the potential impact of risks on capital adequacy and the Bank's long-term business sustainability. Following approval from the Board of Commissioners, the Board of Directors formally establishes BNI's risk management policies, strategies, and framework.
2. Developing, approving, and updating procedures and tools to identify, measure, monitor, and control risks at BNI.
3. Preparing and establishing mechanisms for transaction approval, including approvals for transactions that exceed limits, and defining authorities across all organizational levels.
4. Evaluating and/or updating risk management policies and strategies at least once a year, or more frequently when there are significant changes in factors affecting BNI's business activities, risk exposure, and/or risk profile.
5. Determining BNI's organizational structure, including clear lines of authority and responsibility at every level related to risk management implementation.
6. Being accountable for the implementation of risk management policies, strategies, and frameworks approved by the Board of Commissioners, and evaluating and providing direction based on reports submitted by the Risk Management Unit, including BNI's Risk Profile Report.
7. Ensuring that all material risks faced by BNI, as well as the impacts arising from such risks, are addressed appropriately and periodically reporting accountability to the Board of Commissioners.
8. Ensuring that corrective actions are taken to address issues or irregularities in BNI's business activities identified by the Internal Audit Unit (SKAI).
9. Ensuring the adequacy, both in terms of quantity and quality, of human resources, including continuous competence enhancement, to support effective risk management implementation at BNI.
10. Developing a strong risk management culture across BNI, including risk awareness throughout all organizational levels.
11. Ensuring that the risk management function is implemented independently.

The authority and responsibilities of BNI's Board of Directors in integrated risk management include, at a minimum:

1. Preparing comprehensive written Integrated Risk Management policies that take into account risk appetite and risk tolerance.
2. Implementing established Integrated Risk Management policies, including:
   a. Ensuring the application of Integrated Risk Management within BNI's Financial Conglomerate.
   b. Ensuring that all significant risks and their resulting impacts are appropriately followed up.
   c. Submitting accountability reports periodically to the Board of Commissioners of the Main Entity.
   d. Effectively communicating Integrated Risk Management policies to all relevant organizational levels within BNI's Financial Conglomerate to ensure clear understanding.
3. Embedding a risk culture as an integral component of Integrated Risk Management within BNI's Financial Conglomerate.
4. Ensuring that Integrated Risk Management is implemented independently.
5. Ensuring effective human capital management — covering competence, qualifications, and adequacy of human resources — at BNI as the Main Entity to support execution of the Integrated Risk Management function.
6. Periodically evaluating the review results of the Integrated Risk Management Unit regarding Integrated Risk Management processes to ensure:

a. The accuracy of risk assessment methodologies;
   b. The adequacy of risk management information systems implementation;
   c. The appropriateness of risk management policies and procedures, as well as the determination of risk limits and thresholds.
7. Evaluating and adjusting Integrated Risk Management policies at least once a year, or at any time should there be significant changes in factors affecting BNI's Financial Conglomerate business activities.
8. Understanding risks inherent in all business activities within BNI's Financial Conglomerate and taking necessary actions in line with the Conglomerate's risk profile, including providing recommendations to Financial Services Institutions within the conglomerate regarding risk management implementation.

9. Ensuring the adequacy of infrastructure to manage and maintain control over all risks.

In essence, the Board of Directors is responsible for implementing sound corporate governance, risk management, and compliance in an integrated manner, aligned with current developments in the banking ecosystem and supported by digitalization and technological innovation. This mandate is based on the provisions set out in BNI's Board Charter, which guides the Board in carrying out its duties and responsibilities in managing the Company in accordance with the principles of Good Corporate Governance - transparency, accountability, responsibility, independence, and fairness — while ensuring compliance with applicable laws and regulations, as stipulated in Board of Directors Decree No. KP/377/DIR/R dated August 1, 2025.

In carrying out these duties and responsibilities, the Board of Directors is supported by the Risk Management Unit (SKMR), which also acts as the Integrated Risk Management Unit (SKMRT). Oversight of the Bank's risk management by the Board of Directors is conducted through various forums, including Board of Directors Meetings, the Risk Management & Anti-Fraud Committee (KRA) – Risk Management Sub-Committee (RMC), and the Integrated Risk Management Committee (KMRT).

In 2025, the agenda for the implementation of the Board of Directors' oversight functions, conducted through Board of Directors Meetings, as well as meetings of the Risk Management & Anti-Fraud Committee (KRA), the Risk Management Sub-Committee (RMC), and the Integrated Risk Management Committee (KMRT), is as follows:

No.	Date	Agenda
1	January 24, 2025	Discussion of the Integrated Risk Profile Self-Assessment Results as of December 31, 2024, and the Integrated Capital Adequacy Ratio (CAR) as of December 31, 2024
2	February 3, 2025	KRA-RMC 01/2025 BNI's Soundness Level as of December 31, 2024
3	March 10, 2025	KRA-RMC 02/2025 Review of BNI's Risk Appetite Statement (RAS) for 2025
4	April 16, 2025	KRA-RMC 03/2025 BNI's Individual Risk Profile as of March 31, 2025
5	July 11, 2025	KRA-RMC 04/2025 BNI's Soundness Level as of June 30, 2025
6	August 1, 2025	Discussion of the Integrated Risk Profile Self-Assessment Results as of June 30, 2025, the Integrated Capital Adequacy Ratio (CAR) as of June 30, 2025, and the Integrated Risk Appetite Statement Review Results for 2025 2025
7	October 10, 2025	KRA-RMC 05/2025 BNI Individual Risk Profile as of September 30, 2025
8	November 10, 2025	Board of Directors Meeting to Update BNI's Recovery Action Plan Document for 2025/2026

Board of Commissioners' Oversight [ACGS D.3.18]

The Board of Commissioners supervises the implementation of risk management at BNI through the following measures:

1. Approving BNI's risk management policies, including risk management strategies and frameworks, in accordance with the level of risk to be assumed (risk appetite) and risk tolerance — both quantitative and qualitative.
2. Evaluating risk management policies and strategies at least once a year, or whenever there are significant changes in factors that materially affect BNI's business activities.
3. Evaluating the accountability of the Board of Directors and providing guidance for improvement regarding the implementation of BNI's risk management policies on a regular basis.
4. Evaluating and deciding on proposals or requests submitted by the Board of Directors related to transactions or business activities that, in accordance with applicable provisions, require the consideration and approval of the Board of Commissioners.
5. Ensuring that risk management policies and processes are implemented effectively and are integrated into BNI's overall risk management framework.

In carrying out active supervisory duties over risk management — both on an individual and integrated basis — the Board of Commissioners is supported by the Risk Monitoring Committee, the Audit Committee, and the Integrated Governance Committee. The implementation of the Board of Commissioners' oversight function is conducted through joint Board of Directors and Board of Commissioners meetings, as well as meetings of the Risk Monitoring Committee, Integrated Governance Committee, and Audit Committee.

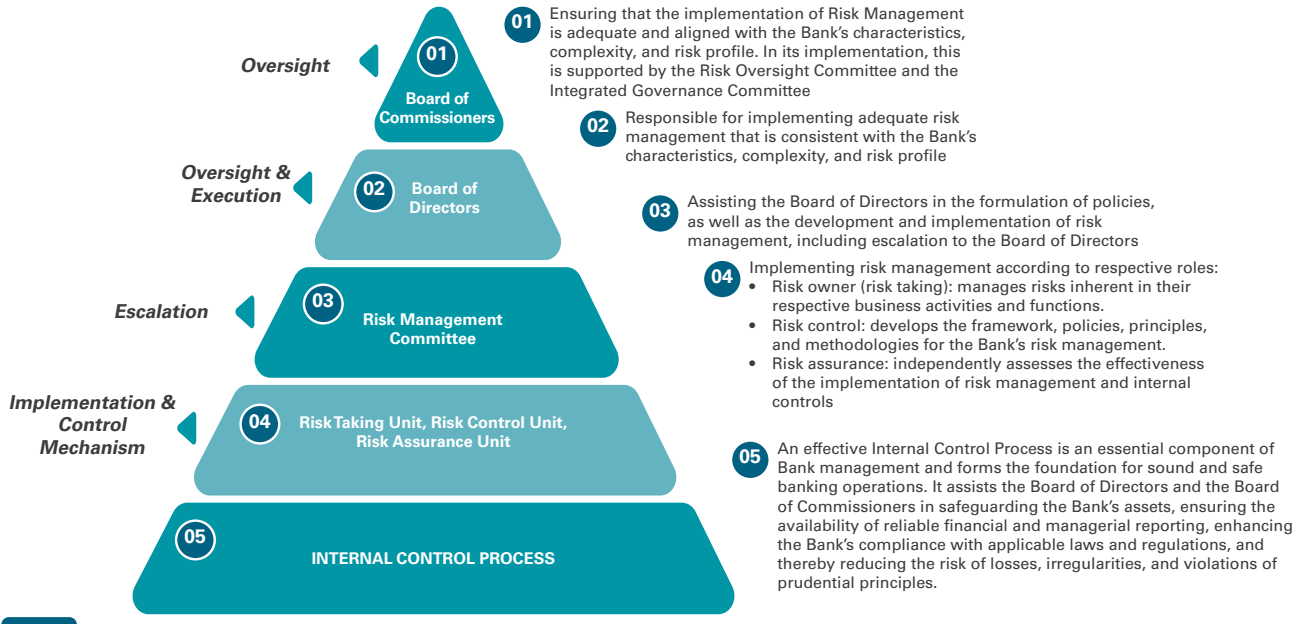
In 2025, the agenda for the implementation of the Board of Commissioners' oversight function — conducted through Board of Commissioners' meetings and meetings of the Risk Monitoring Committee, Integrated Governance Committee, and Audit Committee — is as follows:

No.	Date	Agenda
1	January 16, 2025	Board of Commissioners Meeting: BNI Individual Risk Profile, December 31, 2024
2	January 30, 2025	Board of Commissioners Meeting, Submission of BNI's Composite Risk Rating Results for the Fourth Quarter of 2024 Based on the Regulations of the Ministry of State-Owned Enterprises
3	February 11, 2025	TKT Committee Meeting: Discussion of the Evaluation of the Integrated Risk Profile and Integrated Minimum Capital Adequacy Requirement for the Second Semester of 2024
4	March 20, 2025	Board of Commissioners Meeting: Review of BNI's Risk Appetite Statement (RAS) for 2025
5	April 25, 2025	Board of Commissioners Meeting: BNI Individual Risk Profile, March 31, 2025
6	July 17, 2025	Board of Commissioners Meeting: BNI Individual Risk Profile, June 30, 2025
7	August 5, 2025	TKT Committee Meeting: Discussion of the Evaluation of the Integrated Risk Profile and Integrated Minimum Capital Adequacy Requirement for the First Semester of 2025, and the Results of the Review of the Integrated Risk Appetite Statement for 2025
8	September 25, 2025	Board of Commissioners Meeting: Discussion of the Results of the 2025 Risk Maturity Index (RMI) Assessment for 2024 Performance
9	October 7, 2025	Risk Monitoring Committee: Strategy for Managing the IDR 55 Trillion Government Fund Placement at BNI
10	October 8, 2025	Board of Commissioners Meeting: Strategy for Managing the IDR 55 Trillion Government Fund Placement at BNI
11	October 21, 2025	Board of Commissioners Meeting: BNI Individual Risk Profile as of September 30, 2025
12	November 4, 2025	Risk Monitoring Committee Meeting: Evaluation of BNI's Remedial & Recovery Performance and Legal Case Issues related to Remedial & Recovery Activities (both civil and criminal), along with an Update on the Progress of Legal Case Resolution and Legal Risk Mitigation at BNI
13	November 11, 2025	Board of Commissioners Meeting: Update of BNI's Recovery Action Plan Document for 2025/2026
14	December 11, 2025	Risk Monitoring Committee Meeting: Evaluation of the Implementation of BNI's Risk Management Function during 2025, and Discussion of the Work Plans of the Enterprise Risk Management Division and the Operational Risk Management Division (including SORX) for 2026

BNI runs risk management on its robust Risk Governance framework designed to ensure clarity of roles, decision-making processes, and inter-unit coordinations. This framework helps each function to understand its responsibilities, enabling them to conduct more consistent risk identification, measurement, monitoring, and control.

On this structured governance foundation, BNI can run more integrated risk management and adapt more effectively to changing industry conditions. This approach helps create healthier, more controlled, and more sustainable business processes.

BNI Risk Governance



BNI structures its Risk Governance in multiple layers to ensure risk management is effective and coordinated. The Board of Commissioners oversees risk management, while the Board of Directors ensures it aligns with the Bank's strategy and risk profile. The Risk Management Committee supports decision-making by evaluating and escalating risk issues. At the operational level, the Risk Taking, Risk Control, and Risk Assurance functions play their respective roles in managing, monitoring, and ensuring the effectiveness of risk control. All processes are supported by internal control mechanisms that lay the foundation for healthy, regulatory-compliant Bank operations.

PILLAR 2. ADEQUACY OF RISK MANAGEMENT POLICIES AND PROCEDURES, AND RISK LIMIT SETTING

BNI implements a comprehensive, integrated risk management policy framework as the basis for all work units to manage risk. This policy is formulated in a way that aligns with the Bank's vision, mission, and strategic direction and has been approved by the Board of Commissioners. This framework covers the General Risk Management Policy, the Integrated Risk Management and Integrated Capital Policy, and the Internal Control System Policy. These policies offer strategic guidelines for BNI and entities within the Financial Conglomerate, ensuring that all business activities are conducted with prudent principles and are oriented towards business sustainability.

This policy is further elaborated into risk management procedures to offer guidelines for the Risk Management Unit, as well as technical instructions at the product or specific activity level. These procedures and technical instructions are updated periodically to remain relevant to business, regulatory, and technological changes. As part of its risk control mechanism, BNI also sets risk limits for each risk type (credit, market, liquidity, operational), for each functional activity, and overall, which serve as thresholds for risk-taking and triggers for mitigation actions. Policy, procedure, and limit evaluations are conducted periodically by Management and the Board of Commissioners, in accordance with their respective authorities, with due consideration of the dynamics of the business environment, digitalization, conglomerate risks, and evolving risk exposures.

BNI also strengthens this policy framework by enhancing risk data and analytics capabilities, strengthening risk governance across all subsidiaries, and integrating sustainability risk management (ESG) and climate risk into an integrated risk management strategy. This approach ensures that policies and procedures not only comply with regulatory requirements but also support digital transformation, conglomerate governance, and sustainable business growth.

PILLAR 3. ADEQUACY OF RISK IDENTIFICATION, MEASUREMENT, MONITORING, AND CONTROL PROCESSES, AS WELL AS RISK MANAGEMENT INFORMATION SYSTEMS

BNI has in place a structured risk management process to ensure all business activities operate within acceptable risk limits and remain consistent with prudent principles. This process encompasses four main stages: identification, measurement, monitoring, and control, applied to all types of risks material to the Bank and entities within the BNI Financial Conglomerate. This approach enables BNI to respond appropriately and sustainably to market dynamics, technological developments, and changes in risk behavior.



1. **Risk Identification**
   Risk identification is carried out proactively to identify all potential risks that may arise from activities, products, processes, organizational changes, and external developments such as economic conditions, regulations, technology, and customer behavior.

   BNI's risk identification practices include:
   a. Regularly identifying all types of risks relevant to the Bank's business activities.
   b. Using identification methods and systems that cover all business lines, operational processes, and critical activities.
   c. Identifying specific risks for new products and activities before they are implemented or launched.
   d. Identifying emerging risks such as digital risks, cyber risks, climate risks, new compliance risks, and model risks, so they can be anticipated early.

2. **Risk Measurement**
   This stage is carried out to determine the magnitude of risk exposure, which will become the basis for implementing Capital Allocation and Control (CAR). Measurements are conducted both quantitatively and qualitatively, using methodologies set by regulators and internal methods.

   Risk measurement at BNI includes:
   a. Calculating sensitivity, volatility, and the tendency for changes in risk exposure, as well as correlations between risks.
   b. Measuring risk in aggregate and by risk type.
   c. Using internal models such as scoring, rating, behavioral analytics, and market risk measurement tools.
   d. Conducting backtesting and validating internal models in accordance with regulatory requirements.
   e. Conducting periodic stress testing, particularly for credit and market risks, to assess the Bank's resilience under extreme conditions such as liquidity pressures, economic slowdowns, or negative market sentiment.
   f. Measuring individual risk against eight risk types and Financial Conglomerate risk against ten risk types for consolidation and integrated capitalization purposes.

3. **Risk Monitoring**
   Risk monitoring is conducted continuously to ensure that risk levels remain within agreed limits and consistent with Bank policies and procedures.

   Risk monitoring activities include:
   a. Monitoring compliance with risk limits, risk tolerances, and early warning indicators.
   b. Monitoring exposure trends, portfolio quality, and risk behavior over time.
   c. Assessing the implementation of approved risk mitigation measures and the effectiveness of internal controls.
   d. Monitoring material risks such as non-performing loan risk, market sensitivity, daily liquidity, digital fraud, operational events, and IT risk.

e. Conducting independent monitoring by the Risk Control Unit and operational monitoring by the Risk Taking Unit.
f. Preparing periodic risk reports: Risk Profile, CAR, Operational Risk Loss (KRO) reports, market and liquidity risk reports, Business Continuity Management (BCM) reports, and other thematic reports.

4. **Risk Control**
Risk control aims to ensure risks remain within acceptable limits and do not disrupt the Bank's operational stability or business continuity. BNI's risk control strategy includes:
a. Risk Acceptance: accepting risks within limits that cannot be eliminated but still require strict control.
b. Risk Avoidance: avoiding activities with unacceptable risks or those whose benefits outweigh the potential losses.
c. Risk Transfer: transferring some risks to third parties, such as insurance or outsourcing.
d. Risk Mitigation: strengthening controls, refining processes, adding security barriers, or improving governance to reduce the likelihood or impact of risks.

Control is exercise through:
a. Establishing risk limits and thresholds for mitigation actions.
b. Strengthening SOPs, work procedures, and internal controls.
c. Multi-level approval mechanisms and segregation of duties (the four-eyes principle).
d. Use of hedging instruments for market risks.
e. Implementing a Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP) for operational and IT risks.
f. Implementation of specific mitigation for digital and cyber risks.

5. **Risk Management Information System**
BNI has developed a Risk Management Information System (SIMR) to ensure that all risk identification, measurement, monitoring, and control processes are supported by accurate, complete, and timely data and information. SIMR serves as the primary tool for management to comprehensively monitor risk conditions and make data-driven decisions.

Risk data management is structured to ensure the quality and integrity of information and to ensure that risk reporting meets the needs of management and regulators. The resulting reports cover risk exposure, limit compliance, material risks, risk change trends, and stress testing results as part of the control process.

To support its effectiveness, BNI utilizes various risk applications such as the Internal Rating System (IRS 2.0), RMTools, the Loan Management System (LMS), the SIMON Framework, a credit behavior system, the Central Limit System, Murex for market risk, RCSA/PRCM, the Loss Event Database (LED), Key Risk Indicators (KRI), and Business Continuity Management (BCM). All of these applications facilitate faster and more integrated data consolidation and risk oversight.

The Risk Management Information System (SIMR) is developed in accordance with the IT Strategic Plan, including the provision of a risk front-end application, increased data storage capacity, and enhanced analytics. Each new system undergoes testing and re-assessment to ensure the reliability of its output and its consistency with the Bank's risk management policies.

Through the Model Risk Management Framework (MRM), BNI's Risk Management sector conducts a comprehensive review and assessment of existing and/or future risk management information systems to ensure the accuracy and effectiveness of the models, systems, and processes used. As a follow-up to the development and implementation of the MRM, BNI has expanded the scope of its risk management model validation to include not only risk models but also other models developed and implemented within BNI, including artificial intelligence (AI)-based models.

PILLAR 4. COMPREHENSIVE INTERNAL CONTROL SYSTEM

BNI implements a comprehensive Internal Control System (SPI) to ensure that all Bank operational activities are carried out in accordance with regulations, effectively, and in line with prudential principles. This internal control framework includes management oversight, segregation of functions, adequate policies and procedures, clear authorization mechanisms, and a reporting system that enables early detection of potential irregularities. SPI is an integral part of the Bank's

governance, supporting the reliability of financial reporting, regulatory compliance, and the protection of assets and customer interests.

ISC implementation is strengthened through the roles of the three lines:

1. **The first line,** namely the operational units, is responsible for compliance with policies and procedures and the implementation of day-to-day controls;

2. **The second line,** namely the Risk Management, Compliance, and Internal Control function, ensures the effectiveness of the control framework through independent monitoring and process improvements;

3. **The third line,** namely the Internal Audit Unit (SKAI), gives an independent assessment of the adequacy and effectiveness of the SPI and recommendations for improvement.

SPI at BNI is also supported by systems and technology that enable effective monitoring, integrated risk data management, and control automation to minimize errors and the potential for fraud. SPI evaluations are conducted periodically, both through internal and external audits and through self-assessments by work units, to ensure controls remain relevant to business developments, digitalization, and the Bank's risk dynamics. With a robust internal control framework, BNI can maintain operational quality while strengthening the Bank's resilience in the face of changing business environments.

TYPES OF RISK PROFILE AND HOW THEY ARE MANAGED [ACGS: D.3.19]

BNI applies individual risk management to 8 (eight) types of risks — credit, market, liquidity, operational, legal, reputational, strategic, and compliance risk — in accordance with POJK No. 18/POJK.03/2016 on Risk Management Implementation for Commercial Banks. In addition, within the financial conglomerate framework, BNI also implements integrated risk management covering ten types of risks, as stipulated in POJK No. 17/POJK.03/2014 on Integrated Risk Management for Financial Conglomerates, reinforced by OJK Circular Letter No. 14/SEOJK.03/2015. This approach enables BNI to manage risk exposure both at the banking entity level and within the broader financial ecosystem, thereby supporting the Bank's stability and sustainability.

Further explanation regarding risk types and their management is presented in the subsection "Types of Risks and Their Management," Chapter 6: Capital and Risk Management Practices of this 2025 Annual Report.

REVIEW OF THE EFFECTIVENESS OF RISK MANAGEMENT IMPLEMENTATION [ACGS D.3.17]

BNI consistently conducts periodic evaluations of the adequacy of its risk identification, measurement, monitoring, and control processes across all work units. These evaluations cover not only policies and procedures, but also the systems and technologies that support effective risk management. This approach ensures that every stage of the risk management process adheres to prudential principles and anticipates potential risks that may affect business continuity.

Based on the 2025 self-assessment results, BNI's risk profile — both individually and on an integrated basis — fell under *"Low to Moderate"*. This rating reflects a combination of *Low to Moderate* Inherent Risk and *Satisfactory* Risk Management Quality. These results indicate that BNI's risk exposure remains within acceptable levels and is effectively managed in line with the established risk appetite.

This achievement demonstrates that risk management at BNI — individually and on an integrated basis with subsidiaries — remains manageable and consistently supports business objectives. The rating also highlights the solid performance of the Risk Management Unit (SKMR) and the Integrated Risk Management Unit (SKMRT) in ensuring that risk management is implemented effectively, efficiently, and prudently, thereby preserving operational stability and supporting sustainable growth.

STATEMENT OF THE BOARD OF DIRECTORS AND/OR BOARD OF COMMISSIONERS ON THE ADEQUACY OF RISK MANAGEMENT

[ACGS: D.3.18, D.3.20]

The Board of Directors and the Board of Commissioners affirm that the implementation of risk management within the Bank has been adequate, consistent, and aligned with regulatory requirements and industry best practices. Implementation is carried out through a framework encompassing policies, procedures, methodologies, and information systems that collectively support effective risk management. All risk management processes are implemented on an integrated basis with BNI's subsidiaries within the Financial Conglomerate, while adhering to prudential principles, Good Corporate Governance (GCG), and the established risk appetite and risk tolerance.

The Board of Directors and Board of Commissioners believe that BNI's current risk management system can help meet business objectives in a healthy, sustainable, and competitive manner. As it moves forward, BNI will remain committed to strengthening risk management on a stonger risk culture, enhancing HR capacity, leveraging technology and digitalization, and harmonizing integrated risk management across subsidiaries. These efforts should enhance the Bank's ability to respond to the dynamics of the business environment and evolving regulatory demands.

As part of this commitment, the Board of Directors also ensures that key risks potentially impacting business continuity have been identified and adequately managed. These risks include information technology risks, cybersecurity risks, unpreparedness of disaster recovery infrastructure, and external risks such as health crises, supply chain disruptions, and geopolitical tensions. BNI's risk management framework is designed to strengthen the Bank's resilience from two perspectives: prevention before a crisis occurs (ex ante) and response capabilities during a crisis (ex post). This approach strengthens BNI's position as an adaptive, resilient financial institution capable of creating long-term value for all stakeholders.

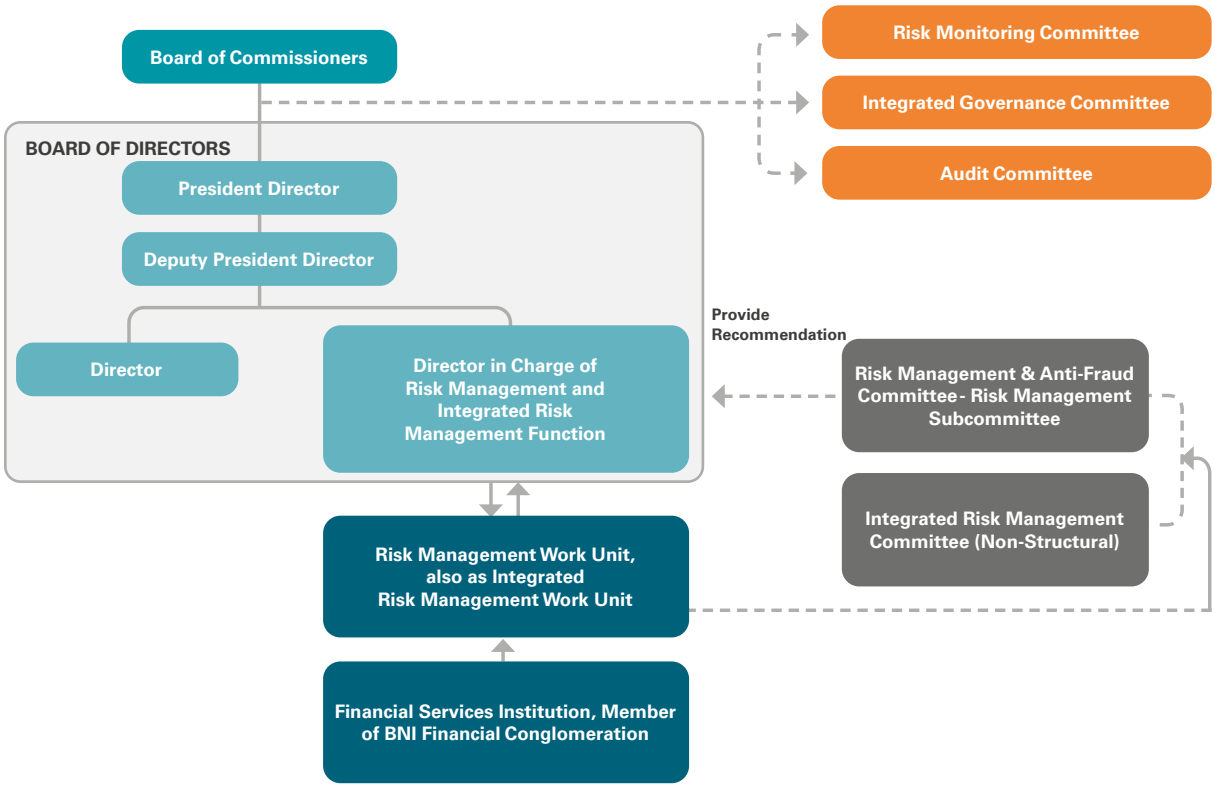
RISK MANAGEMENT UNIT

Structure of BNI's Risk Management Unit

BNI's Risk Management Unit functions are carried out by two primary units: the Enterprise Risk Management (ERM) Division and the Operational Risk Management (ORM) Division. Both divisions are under and directly report to the Director of Risk Management, who oversees the entire risk management function at BNI.

The Enterprise Risk Management (ERM) Division is responsible for enterprise-wide risk management, covering credit, market, and liquidity risks, as well as other strategic risks. Furthermore, ERM also performs the role of the Integrated Risk Management Unit (SKMRT), tasked with managing risks at the BNI Financial Conglomerate level.

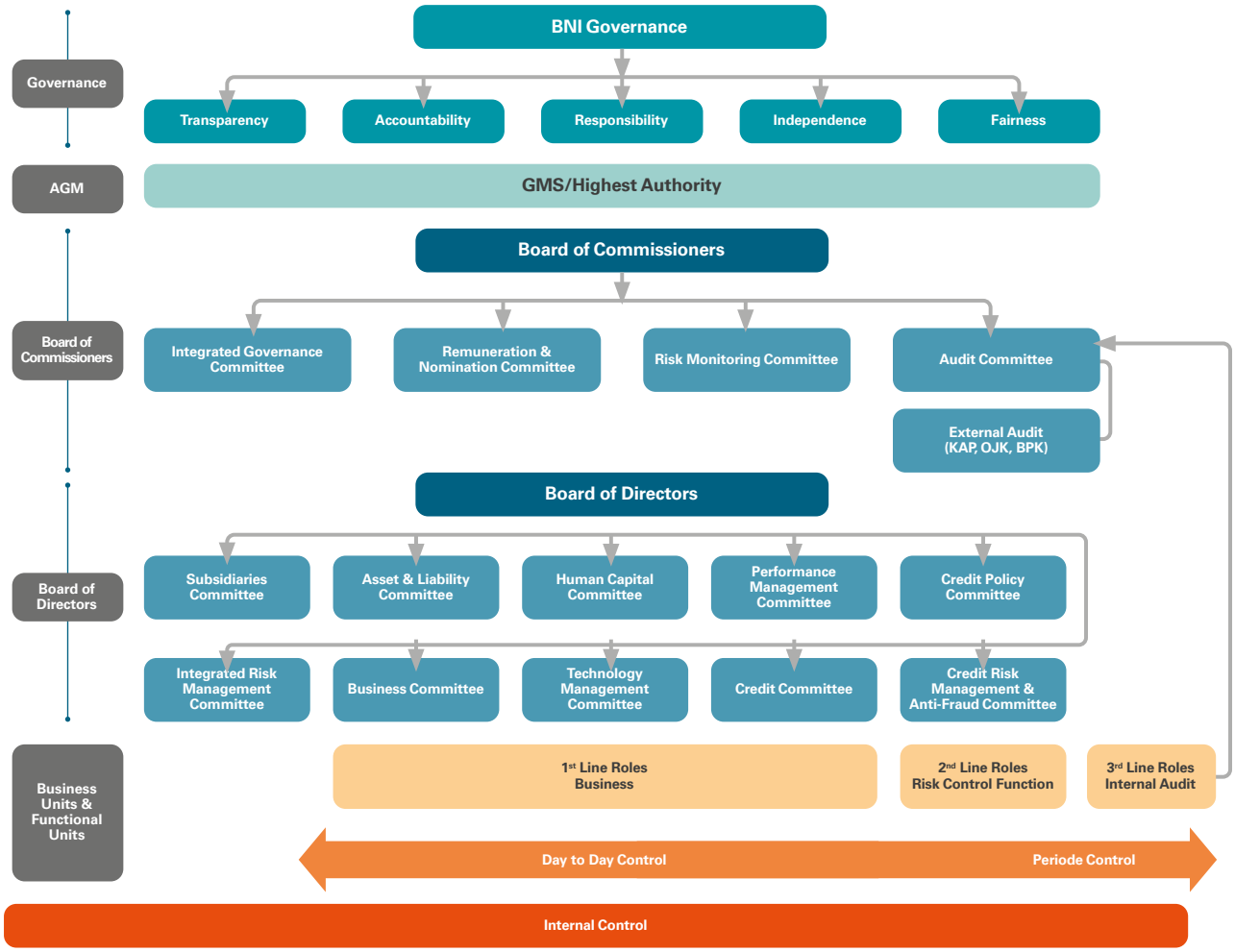
The organizational structure of BNI's Risk Management Unit as of December 31, 2025, is detailed in the following chart:



Notes:

1. The BNI Board of Directors and the Board of Commissioners are authorized and responsible for ensuring the implementation of Risk Management, both on an individual Bank basis and an Integrated basis within the BNI Financial Conglomerate.
2. In performing their supervisory role over the implementation of BNI's Risk Management and Integrated Risk Management, the Board of Commissioners is supported by the Risk Oversight Committee, Audit Committee, and Integrated Governance Committee.
3. The Director overseeing the Risk Management function is responsible for the implementation of both individual Risk Management for BNI and Integrated Risk Management at the Financial Conglomerate level.
4. The Board of Directors is supported by non-structural risk committees, namely:
   - KRA–RMC (Risk Management & Anti-Fraud Committee – Risk Management Sub-Committee) as a forum for escalation and discussion of risk issues at the Bank level;
   - KMRT (Integrated Risk Management Committee) for issues related to the integrated risk of the Financial Conglomerate.
5. If deemed necessary, the Director of Risk Management may address risk issues in other Board committee meetings or during Board of Directors' Meetings to ensure an appropriate and rapid response to risk dynamics.
6. The execution of BNI's risk management function is supported by the Risk Management Unit (SKMR) as an independent unit managing risks at the individual Bank level.
7. The implementation of Integrated Risk Management is supported by the Integrated Risk Management Unit (SKMRT), tasked with risk consolidation, preparing integrated risk profiles, evaluating integrated limits, and coordinating with Financial Services Institutions (LJK) within the BNI Financial Conglomerate.
8. SKMR and SKMRT facilitate and coordinate with risk management units within BNI and across all LJK members of the Financial Conglomerate to manage:
   - 8 (eight) types of individual Bank risks: credit, market, liquidity, operational, legal, strategic, compliance, and reputational risks;
   - 10 (ten) types of Financial Conglomerate risks, including intra-group transaction risk and insurance risk.
9. SKMR and SKMRT perform their duties independently of operational units (Risk Taking Units) and are not involved in business activities, ensuring that the objectivity of risk control is maintained.
10. SKMR has the authority to escalate risk issues to the KRA–RMC or the Director of Risk Management, while SKMRT has the authority to escalate to the KMRT or the Director overseeing Integrated Risk Management, in accordance with their respective scopes of responsibility.

BNI's risk management framework and governance are illustrated as follows:



BNI's risk management governance framework illustrates that the roles of oversight, decision-making, and control implementation operate in layers across the organization. The Board of Commissioners performs the oversight function through committees such as the Risk Oversight Committee, Audit Committee, and Integrated Governance Committee. The Board of Directors then directs the implementation of risk management through various executive committees, including the Integrated Risk Management Committee and the Risk Management & Anti-Fraud Committee.

At the operational level, business units as the first line conduct business activities while implementing daily controls. The risk management and compliance functions act as the second line, monitoring and controlling risks independently, while the Internal Audit Unit serves as the third line, providing an independent assessment of the effectiveness of internal controls.

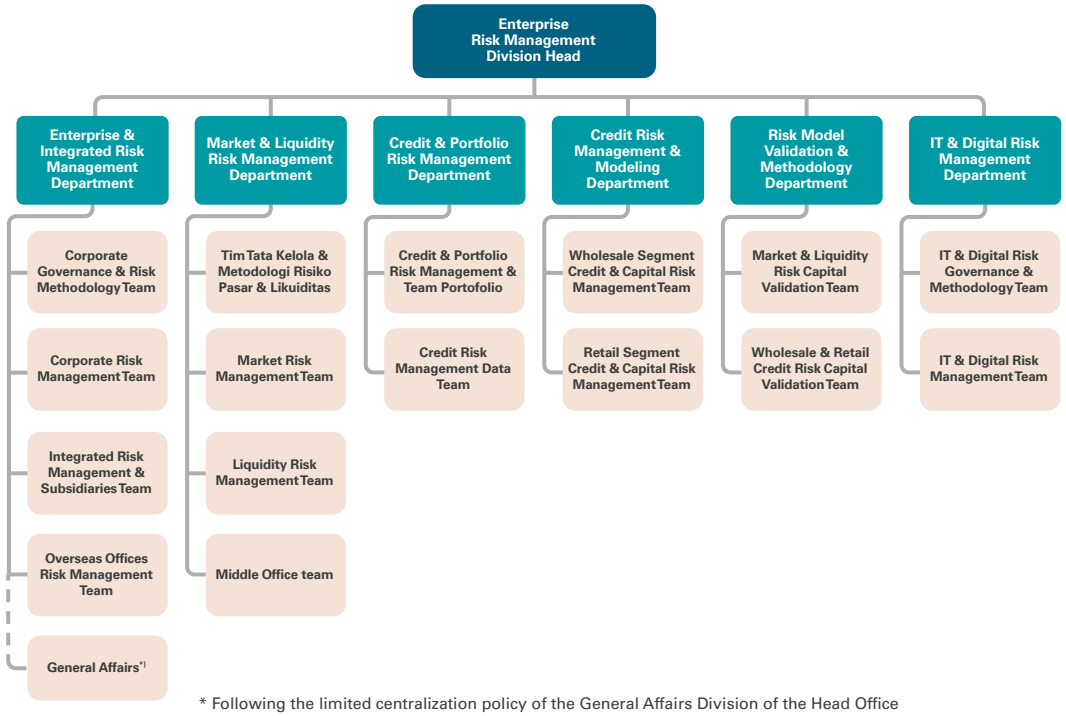
This framework is supported by clear policies and procedures, an adequate organizational structure, human resource competence, and the use of information technology in risk monitoring. Through this integrated governance, BNI ensures that risk management is conducted consistently, comprehensively, and aligned with business objectives and regulatory requirements.

ENTERPRISE RISK MANAGEMENT DIVISION

The Enterprise Risk Management Division serves as the Risk Management Unit (SKMR), managing risks at the Individual Bank level, while simultaneously performing the function of the Integrated Risk Management Unit (SKMRT) for risk consolidation at the BNI Financial Conglomerate level. This division is directly under the supervision of the Director in charge of Risk Management, who is responsible for the implementation of BNI's Risk Management, both on an individual and integrated basis.

Organizational Structure of the Enterprise Risk Management Division

The organizational structure of the Enterprise Risk Management Division as of December 31, 2025, is as follows:



* Following the limited centralization policy of the General Affairs Division of the Head Office

Enterprise Risk Management Division Head Profile



Rayendra Minarsa Goenawan, M.M, B.C.Sc.
Enterprise Risk Management Division Head

Age
41 years old as of December 31, 2025

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Master's degree in Management from Bina Nusantara University JWC

Legal Basis of Appointment
Board of Directors Decree No. KP/289/DIR/R dated June 16, 2023

Terms of Office
February 17, 2022 – present

Professional Certification and/or Training
- Risk Management Certification Level 6 (six);
- BSE Business Essential – Innovation & Digital Disruption Stream;
- Business Essentials Program Innovation and Digital Disruption Course;
- Innovation of Products and Services: Design Thinking;
- Certified Chief Information Security Officer (CCISO)
- Qualified Chief Risk Officer Certification (QCRO)

Work Experience
BNI:
Enterprise Risk Management Division Head - di PT Bank Negara Indonesia (Persero) Tbk (2022 - present)

Other Companies:
- IT Specialist - YLB - Wasiat (2005 - 2007).
- Overseas Branch Coordinator - Maybank Mauritius (Formerly known as PT Bank Internasional Indonesia) (2007 - 2012);
- Enterprise Policy and Portfolio Management Specialist - PT Bank OCBC NISP (2013 - 2016);
- Enterprise Risk Management Head - PT Bank OCBC NISP (2017 - 2022);

Concurrent Position
Has no concurrent position.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders.

Competency Development of Enterprise Risk Management Division Head in 2025

Competency Development Materials	Date of Implementation	Organizer
Knowledge Sharing and Benchmarking Human Capital, Enterprise Risk Management, and Operational Risk Management	January 17, 2025	PT Dirgantara Indonesia
Speakers on Governance Capacity Building for Regional Development Banks (BPD) throughout Kalimantan, with topics on Governance, Risk Management Implementation, and Corporate Credit Development	February 13, 2025	Otoritas Jasa Keuangan (OJK) Provinsi Kalimantan Timur dan Kalimantan Utara
Workshop on Risk Management Model (MRM) Implementation	February 18, 2025	PT Bank Negara Indonesia (Persero) Tbk.
ESG Communication Forum	February 28, 2025	PT Bank Negara Indonesia (Persero) Tbk.
High-Level Business Dialogue Themed "Vietnam and Indonesia: A Partnership for Progress and Prosperity"	March 10, 2025	Kementrian Perencanaan dan Investasi Vietnam
Refreshment TFT Facilitator Branch Management Course (BMC) 1 Year 2025	April 11, 2025	PT Bank Negara Indonesia (Persero) Tbk.
ESG Banker Club	April 16, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Speaker at the Level 6 and Level 7 Risk Management Certificate Maintenance (Refresher) Seminar	April 24–25, 2025	Bankers Association for Risk Management (BARa)
Strategic Competency Training for BUMN Leadership	April 25, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Textile and Textile Product Industry Consulting with the theme "Market Dynamics, Opportunities and Challenges for the Textile and Textile Production Industry in the Context of Strengthening Competitiveness and Economic Sustainability"	May 16, 2025	Otoritas Jasa Keuangan (OJK)
Facilitator for the Branch Management Course (BMC) 1 Batch 2 Training Program in 2025	May 21, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Resource Person for Stock Quest 2025 "Building a Sustainable for a Better Tomorrow"	May 23, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Executive Education Program for the 2025 BUMN School of Excellence (BSE) with the theme "Global Trade Tensions: Turning Crisis into Opportunity"	May 28, 2025	Badan Pengaturan BUMN
Analytical Hierarchy Process (AHP) Workshop in Remodeling Internal Rating Based (IRB) Corporate, Enterprise, and Commercial Segments	June 10–11, 2025 and June 16–17, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Live Streaming Agenda of Risk Management Forum related to ESG	June 11, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Executive Forum on Sustainability Transformation in Action	June 19, 2025	PT Para Mitra Karya
Knowledge Sharing and Benchmarking Human Capital, Enterprise Risk Management, and Operational Risk Management	July 9, 2025	Bank Indonesia (BI)
Speakers on Governance Capacity Building for Regional Development Banks (BPD) throughout Kalimantan, with topics on Governance, Risk Management Implementation, and Corporate Credit Development	July 24, 2025	PT Kuadran Satu Komunika
Joint Achievement Ceremony & Roundtable Discussion: GHG Emissions Reduction in Infrastructure (GERIN)	July 29, 2025	Kementerian Pekerjaan Umum
Speaker on Focus Group Discussion (FGD) on Implementation and Development of Country Risk and Transfer Risk Policies in Indonesian Banking	July 31, 2025	Otoritas Jasa Keuangan (OJK)
High-Level Business Dialogue Themed "Vietnam and Indonesia: A Partnership for Progress and Prosperity"	August 7, 2025	Kementerian Koordinator Bidang Pangan Republik Indonesia
Speakers on the Level 6 and Level 7 Risk Management Certificate Refresher Program Seminar	August 28, 2025	Bankers Association for Risk Management (BARa Risk Forum)
Speakers of the Focus Group Discussion (FGD) with the theme "Green Credit and Banking Credit Growth"	September 2, 2025	Bank Indonesia (BI)
Webinar GRI 102 & GRI 103 "Climate Change and Energy Topic Standard"	September 3, 2025	Indonesia Stock Exchange Bursa Efek Indonesia

Competency Development Materials	Date of Implementation	Organizer
Chief Risk Officer (CRO) Roundtable 2025	September 24, 2025	Bankers Association for Risk Management (BARa Risk Forum)
High-Level Dialogue at Indonesia International Sustainability Forum: Navigating Geopolitics, Policy Shifts, and Private Sector Leadership in ASEAN Green Financing	October 10, 2025	Green Investment Principles (GIP) ASEAN Chapter
ACMF-ISSB Joint Technical Training Workshop dan ACMF-ICAEW Joint Workshop for Corporate Preparers	November 4, 2025	ASEAN Capital Markets Forum (ACMF) dan International Financial Reporting Standards (IFRS) Foundation
Speaker on Seminar The 9th Indonesia Risk Management Outlook (IRMO) 2026: "Navigating Banking Business Amid The Economic Landscape Turmoil"	November 13, 2025	LPPI
BNI ESG Sustainability & Transition "BEST" Event Peluncuran Advisory Playbook Perkebunan Kelapa Sawit	November 19, 2025	PT Bank Negara Indonesia (Persero) Tbk.
Speaker on the Webinar "Green/ESG-Based MSME Financing Sources: Access, Instruments, and Best Practices"	November 28, 2025	Mata Garuda
GRC Function Strengthening Forum: Harmony in Collaboration for GRC Function Strengthening in the Financial Services Sector	December 8, 2025	Otoritas Jasa Keuangan (OJK)

Duties and Responsibilities of the Enterprise Risk Management Division

As the Risk Management Work Unit (SKMR) and Integrated Risk Management Work Unit (SKMRT), the Enterprise Risk Management Division performs the following functions:

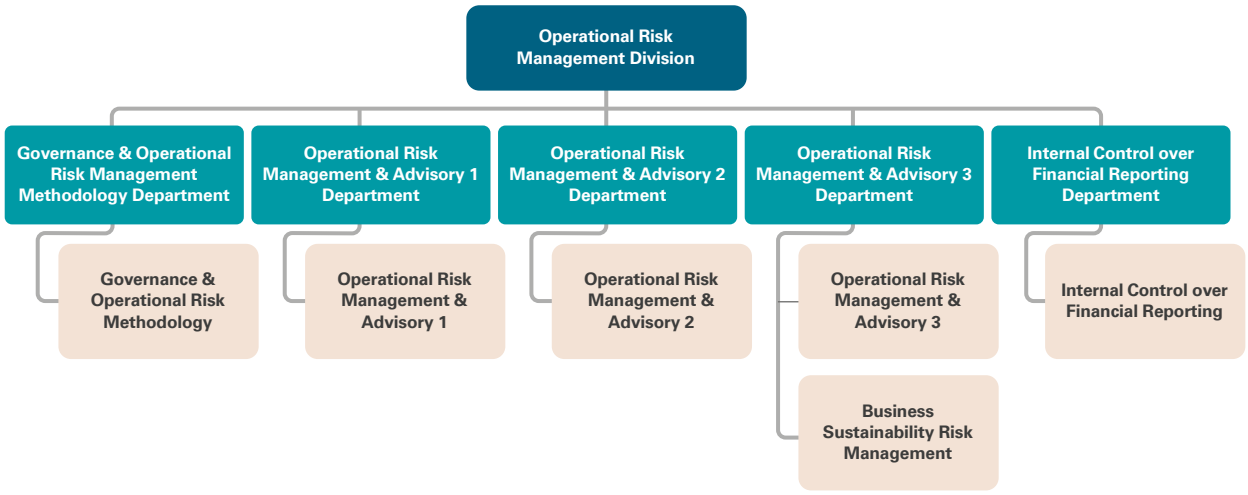
1. Formulating risk management strategies aligned with BNI's vision, mission, business direction, and risk appetite, ensuring that all risk management remains focused and supports the achievement of both the Bank's and the Financial Conglomerate's objectives.
2. Developing risk management frameworks through the preparation of policies, guidelines, SOPs, as well as risk appetite and risk tolerance, including conducting regular updates to remain relevant to business, technological, and regulatory dynamics.
3. Developing risk measurement methodologies, Bank risk limits, and integrated limits, as well as various risk models such as rating, scoring, early warning systems, stress testing, and scenario analysis to ensure accurate and consistent risk measurement.
4. Organizing comprehensive Bankwide risk management processes, including identification, measurement, monitoring, and control of risks, as well as the preparation of Risk Profiles, ICAAP, KPMM (Capital Adequacy Ratio), and other risk management reports.
5. Executing the Integrated Risk Management (SKMRT) function through the preparation of Integrated Risk Profiles, integrated capital adequacy, and coordinating the implementation of risk management policies and processes across all Financial Services Institutions (LJK) within the BNI Financial Conglomerate.
6. Conducting risk reviews of new products, activities, programs, models, and initiatives, providing mitigation recommendations, and offering risk advisory services to the Board of Directors, business units, and Subsidiaries to ensure prudent decision-making.
7. Managing the development and integration of Risk Management Information Systems, including the management of credit, market, liquidity, operational, and integrated risk data to provide accurate and timely risk information for management.
8. Promoting the strengthening of risk culture through socialization, education programs, competency development, and monitoring risk culture maturity to ensure that prudential principles are deeply rooted across all levels of the BNI Group organization.
9. Performing validation and independent reviews of risk models used by the Bank, such as credit, market, liquidity, scoring, rating, and EWS models, to ensure the models are reliable, accurate, compliant, and meet the Bank's risk management standards.
10. Developing and managing the Digital Risk and Cyber Risk Management framework, covering IT and cybersecurity risk reviews, cyber resiliency tests, 3rd party risk assessments, and the development of the Cyber Defense Roadmap to ensure the Bank's technological resilience and information security.

OPERATIONAL RISK MANAGEMENT DIVISION

In addition to the ERM Division, BNI has also established the Operational Risk Management (ORM) Division, which serves as the Risk Management Unit (SKMR) and the Integrated Risk Management Work Unit (SKMRT), which are directly under the supervision and responsible to the Risk Management Director. This Director oversees two main functions, namely the Risk Management function and the Integrated Risk Management function.

Organizational Structure of the Operational Risk Management Division

The structure of the Operational Risk Management Division as of February 07, 2025, is as follows:



Operational Risk Management Division Head Profile



Putu Bagus Kresna
Operational Risk Management Division Head

Age
53 years old as of December 31, 2025

Nationality
Indonesian citizen

Domicile
Jakarta, Indonesia

Education
Obtained a Master's degree in Banking & Finance Management from the University of Indonesia and a Bachelor's degree in Accounting from the Faculty of Economics and Business, University of Indonesia.

Legal Basis of Appointment
Board of Directors' Decree No. KP/832/DIR/R dated August 5, 2025.

Terms of Office
August 13, 2025 – Present

Professional Certification and/or Training
1. WPPE License (Securities Brokerage Representative), OJK
2. WPEE License (Underwriter Representative), OJK
3. WMI License (Investment Manager Representative), OJK
4. Risk Management Certification Level 6
5. Tax Brevet AB, IAI (Institute of Indonesia Chartered Accountants)
6. Tax Brevet C, IAI (Institute of Indonesia Chartered Accountants)

Work Experience
BNI
1. Deputy General Manager of BNI London Branch, UK (July 2008 - August 2010)
2. Corporate Secretary Division Head (August 2010 - August 2011)
3. Process Excellence Unit Head (August 2011 - December 2013)
4. Corporate University Division Head (December 2013 - April 2017)
5. Regional CEO of Regional Office 08 - Denpasar (April 2017 - May 2018)
6. Accounting & Budgeting Division Head (May 2018 - February 2020)
7. SEVP BNI Sekuritas (February 2020 - June 2020)
8. Operations Director of BNI Sekuritas (June 2020 - June 2023)
9. Head of SORX3, (July 2023 - August 2025)
10. Operational Risk Management Division Head (August 2025 - present)

Concurrent Position
Has no concurrent position.

Affiliation Relationship
Has no affiliation with members of the Board of Directors, Board of Commissioners, or Majority/Controlling Shareholders.

Training and/or Competency Development of Operational Risk Management Division Head in 2025

Competency Development Materials	Date of Implementation	Organizer
Seminar International Manajemen Resiko Bank Indonesia 2025	2025	Bank Indonesia
Seminar in UK The Cross Border Payment Landscape, Economic Outlook, Industry Development, Future Proofing Trade Operation, Compliance Overview and Best Practice, Cyber and Fraud Protection	2025	J. P Morgan Chase Bank, N. A.
Seminar The 3rd OJK International Research Forum (IRF 3)	2025	OJK

Duties and Responsibilities of the Operational Risk Management Division

The Operational Risk Management Division broadly undertakes the following duties and responsibilities:

1. Formulating and developing the Operational Risk Management, Business Continuity Management (BCM) frameworks and Third Party Risk Management (TPRM);
2. Managing and enhancing tools and methodologies for operational risk management, BCM and Third Party Risk Management (TPRM);
3. Preparing, evaluating, and presenting proposals for setting the Risk Appetite and Risk Tolerance to the Board of Directors.
4. Managing and refining the calculation of Operational Risk-Weighted Assets (ATMR) in accordance with regulatory requirements.
5. Monitoring the implementation of the Operational Risk Management, BCM frameworks and Third Party Risk Management (TPRM);
6. Managing and advancing programs to enhance Operational Risk Awareness.
7. Conducting studies and analyses of operational risks.
8. Providing advisory support to managed units in conducting assessments and offering recommendations for mitigating operational risks associated with the bank's products and/or activities.
9. Managing and developing policies for the implementation of internal control over financial reporting (ICoFR).

Development of Risk Management Competencies in 2025

Throughout 2025, the Enterprise Risk Management Division and the Operational Risk Management Division actively participated in various competency development programs. These initiatives aimed to enhance team capabilities and expertise through both internal and external training sessions. The following outlines the competency development activities undertaken in 2025:

Competency Development Materials	Date of Implementation	Organizer
Corporate Finance Batch I	April 21, 2025	KODIVA
Basic Asset & Liability Management (ALMA) with Simulation	June 9-12, 2025	Lembaga Pengembangan Perbankan Indonesia (LPPI)
Seminar on Banking Industry Readiness in Responding to Escalating Climate Risk & Cyber Risk	June 18, 2025	Indonesian Risk Professional Association
Market Risk (FRTB, IRRBB, Stress Test)	June 25-26, 2025	Golden Regency Consulting (GRC)
Data Analytics & Visualization Training	August 25-27, 2025	PT Dibimbing Digital Indonesia (dibimbing.id)
Awareness ISO 37001:2016 SMAP	September 15, 2025	ROBERE & ASSOCIATES
Enterprise Risk Management Associate Professional (ERMAP) Certification	October 28-29, 2025 November 4-5, 2025, and Desember 16-17, 2025	Enterprise Risk Management Academy (ERMA)
ALM (Asset Liability Management) & ILAAP (Internal Liquidity Adequacy Assessment Process) Training	December 6-7, 2025	FINRISK.EU
Refreshment Risks & Frauds in International Trade	December 9, 2025	Ikatan Bankir Indonesia
Certificate AI-Powered Case Teaching	December 14-20, 2025	ELI Global Virtual
Excel for Smart Analysis	December 16-17, 2025	Swadharma Sentra Solusi

Risk Management Certification

As of December 31, 2025, risk management certification has been conducted as part of efforts to enhance professionalism, performance, and individual potential in supporting the execution of risk management responsibilities. The certifications completed include:

Qualification Level	Mandatory Position	Total Employee
4	Non-Executive Officers in areas related to risk management, compliance, internal audit and key operations (taking and implementing decisions on credit/financing, treasury, information technology and financial risks).	10,686
5	Employees who meet the criteria of Executive Officers in areas related to risk management, compliance, internal audit and key operations (taking and implementing decisions on credit/financing, treasury, information technology and financial risks).	3,495
6	Board of Commissioners (BoC) dan SEVP	201
7	Board of Directors (BoD)	41

Board of Directors' Assessment of the Risk Management Unit's Performance

The Board of Directors assesses that the Risk Management Unit (SKMR) has performed its functions effectively and played a vital role in maintaining the quality of risk management across all of BNI's business activities. The SKMR is deemed capable of providing a comprehensive risk management framework of policies, methodologies, and procedures that are adaptive to business dynamics and regulatory developments.

The Board also evaluates that the SKMR has demonstrated strong performance in ensuring disciplined risk management implementation through intensive coordination with business units and support functions. This is reflected in the SKMR's consistency in performing model validations, refining risk measurement methodologies, strengthening risk management information systems, and enhancing the implementation of integrated risk management at the Financial Conglomerate level.

Furthermore, the Board of Directors expresses its appreciation for the SKMR's role in strengthening the effectiveness of the three lines model, ensuring that Risk Owners, Risk Control Units, and the Internal Audit Unit perform their duties in alignment and in accordance with good governance principles. The guidance and monitoring conducted by the SKMR have contributed to the improved quality of risk control across all organizational lines.

Overall, the Board of Directors views the SKMR's performance as solid and consistent, providing a significant contribution to maintaining BNI's risk profile at a manageable level in alignment with the established risk appetite. This performance reinforces the Board's confidence that the SKMR has become a strategic partner in supporting business processes that are prudent, resilient, and sustainable.

Integrated Risk Management Governance [ACGS C.2.6]

As the parent entity of a Financial Conglomerate, BNI is required to implement Integrated Governance (TKT) across all of its business activities, with the objective of enhancing performance, maintaining compliance with applicable laws and regulations, and promoting ethical values within the financial services industry.

To support an effective implementation of TKT, BNI implements an internal control system that is integrated and binding on all members of the BNI Financial Conglomerate, as part of strengthening integrated risk management. In this context, BNI as the Main Entity has also established a joint commitment between BNI's Internal Audit Unit and the Internal Audit Units of Financial Conglomerate members to carry out integrated internal audit functions and keep the quality of internal control functions consistently across management levels.

In implementing consolidated and integrated risk management, BNI as the Main Entity within KK BNI has developed the Integrated Risk Management General Policy (KUMRT) as part of the Bank's compliance with applicable Indonesian regulations and risk management framework for both BNI and its Financial Conglomerate members. As of 31 December 2025, BNI monitored and managed ten types of risks: credit, market, operational, liquidity, legal, reputational, strategic, compliance, intra-group transaction risk, and insurance risk.

In practice, implementation of TKT and integrated risk management within KK BNI refers to several key regulations, including:

1. POJK No.17/POJK.03/2014 on Integrated Risk Management Implementation for Financial Conglomerates;
2. POJK No.18/POJK.03/2014 on Integrated Governance Implementation for Financial Conglomerates;
3. POJK No. 30 of 2024 on Financial Conglomerates and Financial Conglomerate Parent Entities;
4. SEOJK No.15/SEOJK.03/2015 on Integrated Governance Implementation for Financial Conglomerates;
5. SEOJK No.14/SEOJK.03/2015 on Integrated Risk Management Implementation for Financial Conglomerates; and
6. Ministry of SOEs Regulation No. PER-2/MBU/03/2023 on Governance Guidelines and Significant Corporate Activities of State-Owned Enterprises.

Guided by these regulations and applicable internal provisions, BNI is committed to building a Financial Conglomerate that grows soundly, prudently, sustainably, and competitively. To this end, BNI has prepared TKT Guidelines, established a TKT Committee, and incorporated integrated compliance, integrated internal audit, and integrated risk management functions into its governance structure. The Controlling Shareholder has also appointed BNI — as the Main Entity — to act as coordinator for assessing the risk management processes of the BNI Financial Conglomerate.

SCOPE OF INTEGRATED RISK MANAGEMENT

BNI's Financial Conglomerate (KK) BNI has implemented Integrated Risk Management comprehensively and effectively in accordance with POJK No. 17/POJK.03/2014. Guided by this regulation, BNI manages and controls the risk exposure of the conglomerate based on four main pillars, summarized as follows:

1. Oversight by the Board of Directors and Board of Commissioners of the Main Entity
   The Board of Directors and Board of Commissioners of the Main Entity are responsible for ensuring the implementation of Integrated Risk Management within the Financial Conglomerate, involving understanding risk exposure, fostering a risk culture, and risk management implementation within each member of Financial Services Institutions (LJK) conglomerate.

2. Adequacy of Integrated Risk Management Policies, Procedures, and Limits
   Effective implementation of Integrated Risk Management must be supported by clearly defined policies that reflect the risk appetite and risk tolerance the Financial Conglomerate is willing to accept.

3. Adequacy of Integrated Risk Management System Processes for Risk
   The process of Identification, Measurement, Monitoring, and Control, is conducted in an manner on all material risk factors supported by an Integrated Risk Management Information System and reports on performance, financial condition, and risk exposure of all entities within the Financial Conglomerate.

4. Comprehensive Internal Control System
   The implementation of Integrated Risk Management is supported by a comprehensive internal control system to safeguard the conglomeration's assets, ensure the reliability of reporting, enhance compliance with applicable laws and regulations, and minimize the risk of losses and irregularities.

The implementation of Integrated Risk Management is complemented by a comprehensive internal control system to safeguard conglomerate assets, ensure reporting reliability, improve compliance with laws and regulations, and minimize the risk of loss and irregularities.The implementation of Integrated Risk Management within the BNI Financial Conglomerate (KK) serves as a critical foundation for understanding and managing risk exposure comprehensively at the group level. This implementation is carried out comprehensively under the oversight of the Board of Commissioners, supported by the Integrated Governance Committee. In its capacity as the Holding Company of the Financial Conglomerate, BNI has implemented Integrated Risk Management based on four main pillars, as follows:

Pillar I – Oversight by the Board of Directors and Board of Commissioners
BNI has set up an integrated risk governance structure through the establishment of a Financial Conglomerate Structure, the appointment of Integrated Risk Management Director, and the establishment of an Integrated Risk Management Committee and an Integrated Risk Management Work Unit. In addition, BNI has set an integrated risk appetite and risk tolerance, developed a Financial Conglomerate Corporate Charter, and held regular Integrated Risk Management Committee meetings. The General Integrated Risk Management Policy (KUMRT) and Integrated Capital Policy are developed by the Board of Directors and approved and periodically evaluated by the Board of Commissioners.

Pillar II – Adequacy of Integrated Risk Policies, Procedures, and Limits
BNI has developed and periodically reviewed Integrated Risk Management policies, procedures, and guidelines, including procedures for the Integrated Risk Profile, Integrated Capital Management, and the management of Intra-Group Transaction Risk. Integrated risk limits and escalation mechanisms for limit exceedances are implemented to ensure risks remain within established tolerance limits.

Pillar III – Integrated Risk Management Process and System
BNI has set a methodology and implements an Integrated Risk Profile assessment and the calculation of the Integrated Minimum Capital Adequacy Requirement (KPMM) on a semi-annual basis, reporting these to the Financial Services Authority. Risk appetite, risk limits, and Leading Risk Indicators (LRI) are monitored periodically, accompanied by integrated stress testing and the development of a technology-based Integrated Risk Management Information System.

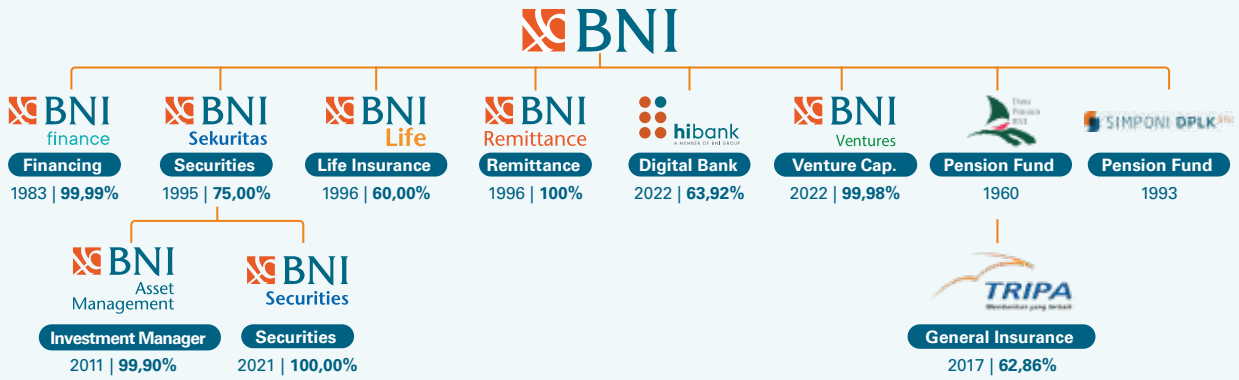
Pillar IV – Integrated Internal Control System
The implementation of Integrated Risk Management is strengthened through ongoing outreach to all Financial Services Institutions (FSIs) members of the Financial Conglomerate and consistent monitoring of Integrated Risk Management implementation to ensure the effectiveness of internal controls across all entities.

BNI'S FINANCIAL CONGLOMERATION STRUCTURE AND OWNERSHIP STRUCTURE

Based on POJK Number 17/2014 and POJK Number 30/2024, BNI stipulates that the scope of Integrated Risk Management implementation covers all Financial Services Institutions within the BNI Financial Conglomerate, including the business activities of banks, insurance companies, securities companies, finance companies, venture capital companies, and pension funds. The Financial Conglomerate structure is designed to ensure it runs comprehensive risk management in a harmonious and integrated manner across all conglomerate entities.

Referring to the Decree of the Members of the Board of Commissioners of the Financial Services Authority No. KEP-12/KS.1/2025 concerning the Approval of PT Bank Negara Indonesia as the Holding Company of the Operational Financial Conglomerate of the BNI Financial Conglomerate, the structure of the BNI Financial Conglomerate is as follows:

BNI Financial Conglomerate Structure



FULFILLMENT OF RISK MANAGEMENT ORGANS IN LINE WITH SOE REGULATORY CATEGORIES AND CLASSIFICATIONS

In accordance with the provisions set by the State-Owned Enterprise Regulatory Body, BNI — as a state-owned bank classified as Systemic A risk — bears additional responsibilities in implementing Integrated Risk Governance aligned with the characteristics of a financial conglomerate. In implementing consolidated and integrated risk management, BNI refers to Minister of SOEs Regulation No. 2/2023, which stipulates that the obligation to establish risk management organs must be adjusted to the category and classification of SOEs and SOE subsidiaries. The requirements are presented in the table below:

Risk Management Organs	Risk Classification Quadrant of State-Owned Enterprises (SOEs) and SOE Subsidiaries			
	Systemic A	Systemic B	Significant	Neutral
Board of Commissioners (Supervisory Board)	√	√	√	√
Board of Directors	√	√	√	√
Audit Committee	√	√	√	√
Risk Monitoring Committee (KPR)	√	√	√	Served concurrently by the Audit Committee
Integrated Governance Committee	√	Served concurrently by KPR	Served concurrently by KPR	
Board of Directors in Charge of Management	√	√	Concurrently held by the Director in charge of Financial Management	Concurrently held by the Director in charge of Financial Management
Board of Directors in Charge of Financial Management	√	√	√	√
SPI (Internal Audit Function)	√	√	√	√

BNI and its Subsidiaries within the Financial Conglomerate structure have fulfilled the requirements for establishing risk management organs in accordance with each company's Risk Classification, as stipulated in Minister of SOEs Regulation No. 2/2023.

KEY PRINCIPLES OF INTEGRATED RISK PROFILE ASSESSMENT

In assessing the Integrated Risk Profile, BNI adheres to key assessment principles that refer to SEOJK No. 14/2015, as follows:

1. **Risk Aggregation.** Risk assessment is conducted by aggregating all risks within the Financial Conglomerate in a comprehensive manner, with due consideration of their impact on the overall condition of the conglomerate along with current and future internal and external factors.
2. **Holistic.** Risk assessment is carried out by considering interrelationships among various risk factors (holistic approach), thereby producing conclusions that provide a comprehensive picture of the risks faced by the Financial Conglomerate.
3. **Significance and Proportionality**. Risk assessment is conducted by proportionally considering the significance or materiality of risks across the Financial Conglomerate as a whole, including each Financial Services Institution (LJK) within it.
4. **Comprehensive and Structured.** Risk assessment is conducted thoroughly and systematically, supported by relevant analysis and presented in a structured manner in a form of conclusions of the level of Financial Conglomerate risks.

RESULTS OF THE INTEGRATED RISK PROFILE ASSESSMENT

As of December 31, 2025 the assessment of ten risk types indicated that the Integrated Risk Profile was rated Level 2 (Low to Moderate), with Inherent Risk also assessed at Low to Moderate. The Quality of Integrated Risk Management Implementation (KPMR) at BNI was assessed as Satisfactory. Further details are presented in the discussion on the Integrated Risk Profile on page 557.

External Audit [ACGS: C.6]

To maintain independence and the quality of oversight over financial matters, BNI appoints a Public Accounting Firm (KAP) to audit both interim and annual financial statements, on an individual and consolidated basis with its Subsidiaries. The Public Accounting Firm is selected transparently through BNI's applicable goods and services procurement mechanisms, thereby ensuring accountability at every stage of the process.

To guarantee the objectivity of the audit results, BNI ensures that the appointed External Auditor has no conflict of interest with the Bank or its management. In addition, over the past two years, there have been no members of the Board of Directors, executive officers, or employees of BNI who originated from the Bank's external auditor, either as employees or as partners, including signing partners. This underscores BNI's commitment to the principles of independence and integrity in the audit process.

For the 2025 financial year, the external audit was conducted in accordance with Public Accounting Professional Standards, within the agreed scope, and was completed in a timely manner, thereby supporting the reliability of the Bank's financial information.

IMPLEMENTATION OF THE EXTERNAL AUDIT FUNCTION

The implementation of audit activities within BNI is not only carried out by internal auditors through IAD but also involves external auditors who have competence and expertise in the field of accounting and auditing, such as the Financial Services Authority (OJK), Bank Indonesia (BI), the Audit Board of Indonesia (BPK), and the Public Accounting Firm (KAP).

In 2025, BNI was audited by several external institutions, such as Bank Indonesia (BI), Financial Services Authority (OJK), Audit Board of Indonesia (BPK), Center for Financial Transaction Reports and Analysis (PPATK), and Public Accounting Firm (KAP).

PROCEDURES FOR APPOINTMENT OF PUBLIC ACCOUNTING FIRM (KAP) AND THE ROLE OF THE AUDIT COMMITTEE

In order to fulfill the implementation of the external audit function in accordance with the provisions of POJK Number 9 of 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities and SE OJK Number 18/SEOJK.03/2023 concerning Procedures for Using Public Accounting Services in Financial Services Activities, BNI has carried out an audit of the Bank's Financial Statement for the 2024 financial year, which was carried out by an independent, competent, professional and objective Public Accountant (AP) and Public Accounting Firm (KAP) in accordance with the Public Accountant Professional Standards, as well as the work agreement and audit scope that have been determined.

BNI determined selected APs and KAPs to examine the Bank's financial statements for the 2025 financial year through holding an Annual GMS held on March 26, 2025, by considering recommendations from the Board of Commissioners and Audit Committee. The selection process has also been carried out in accordance with POJK Number 9 of 2023, SE OJK Number 18/SEOJK.03/2023, and internal Bank regulations to guarantee the independence and quality of audit results from the appointed AP and KAP. Following up on the results of the 2025 AGMS resolution, the Board of Commissioners decided to reappoint KAP Rintis, Jumadi, Rianto & Partner (member firm of the PricewaterhouseCoopers network) as an external auditor to examine the Consolidated Financial Statement, Micro and Small Business Funding Program Financial Statement, and other reports for the 2025 Financial Year period. [ACGS: D.2.24]

The legal basis regarding the appointment and determination of KAP within the scope of BNI is as follows:

1. POJK No. 9 of 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities in Chapter III, Restrictions on the Use of Audit Services Article 7, paragraph 1, states that parties in the form of

commercial banks, issuers, and public companies are obliged to limit the use of audit services on annual historical financial information from the same AP for 7 (seven) cumulative years;
2. POJK No. 37/POJK.03/2019 concerning Transparency and Publication of Financial Statements and SEOJK No. 9/SEOJK.03/2020 concerning Transparency and Publication of Conventional Commercial Bank Reports.
3. The process of appointing KAP Rintis, Jumadi, Rianto & Partner (member firm of the PricewaterhouseCoopers network) as an external auditor is carried out through a "Tender" mechanism.

Throughout the appointment process of the KAP and AP, the Audit Committee plays an active role in providing recommendations to the Board of Commissioners regarding the appointment and or replacement of the KAP and AP to conduct audits of BNI's financial statements. These recommendations are formulated based on a comprehensive evaluation of independence, competence, scope of engagement, and the performance of the KAP in the previous period, to ensure that the audit process is carried out in a professional, objective, transparent manner and in compliance with applicable accounting standards and regulatory requirements.

COORDINATION OF EXTERNAL AUDITORS AND AUDIT COMMITTEE

To support the smooth and effective conduct of the audit, BNI's Audit Committee maintains active communication with the external auditor regarding the audit plan, methodology, and key issues that need to be brought to management's attention. Throughout the audit process, the Audit Committee, together with the Internal Audit Division (IAD), ensures that the audit is carried out in accordance with applicable requirements and evaluates its quality. As a follow up, the Audit Committee oversees the timely implementation of the external auditor's recommendations by management in line with governance standards, in order to mitigate risks and strengthen the Bank's compliance. All coordination outcomes and follow up actions are documented in the Audit Committee Report for 2025 and are reported to the Financial Services Authority (OJK) in accordance with prevailing regulations.

EFFECTIVENESS OF EXTERNAL AUDIT IMPLEMENTATION

In accordance with its role and authority, the BNI Audit Committee ensures that all stages of external audit implementation carried out by AP and/or KAP always run according to established standards. By continuing to maintain transparent and collaborative communication with the AP and/or KAP, the Audit Committee opens a discussion space to discuss matters of concern to the Audit Committee before the audit process begins and, of course, also evaluates the implementation of the audit by the AP and/or KAP after the audit process is completed, and then the results are submitted to the OJK.

In 2025, the Audit Committee has carried out an evaluation of the implementation of audit services for annual historical financial information by AP and/or KAP, which includes at least:
a. Conformity of Audit Implementation by AP and/or KAP with applicable Audit Standards;
b. Sufficiency of Field Work Time;
c. Assessment of the Scope of Services Provided and the Adequacy of Sampling Test; and
d. Recommendations for Improvements Provided by AP and/or KAP.

Oversight and monitoring over the performance of the Public Accountant (AP) and or Public Accounting Firm (KAP) were presented to and discussed with the Board of Directors through Audit Committee meetings, which were attended by the Internal Audit Division (IAD) and the relevant members of the Board of Directors. These meetings also addressed the follow up on audit findings issued by the AP and or KAP. Through such coordination, the audit process was able to deliver comprehensive and optimal audit results.

The Audit Committee's evaluation report was subsequently submitted by the Board of Directors of BNI using the form provided in the appendix to OJK Circular Letter No. 18/SEOJK.13/2023 on Procedures for the Use of Public Accountants and Public Accounting Firms in Financial Services Activities, and was signed by the Audit Committee on June 26, 2025.

BANK COMPLIANCE WITH PROVISIONS REGARDING THE RELATIONSHIP BETWEEN BANKS, PUBLIC ACCOUNTANTS, AND OJK

In carrying out the audit, BNI ensures that the Bank maintains compliance with the provisions regarding the relationship mechanism that exists between the Bank, Public Accountants, and the OJK. In addition, BNI also complies with applicable regulations regarding supervision and reporting to the OJK with the aim of improving the quality of corporate governance and maintaining financial system stability.

The Bank's efforts to increase the effectiveness of external audit implementation and BNI's compliance with provisions relating to the relationship between

banks, public accountants, and OJK are realized through the following steps:

1. POJK No. 9 of 2023 concerning the Use of Public Accounting Services and Public Accounting Firms in Financial Services Activities states that:
   a. Banks are required to use APs and KAPs that are registered and listed on the list of active APs and KAPs at the OJK;
   b. Banks are required to limit the use of audit services for annual historical financial information from the same AP for 7 (seven) cumulative years.
2. Through Board of Commissioners Letter No. DK/31/R dated March 13, 2025, BNI appointed KAP Rintis, Jumadi, Rianto & Rekan (member firm of the PricewaterhouseCoopers network) as external auditors to audit BNI's Financial Statements and other reports for the 2025 financial year.
3. The appointment of a Public Accountant and/or the same Public Accounting Firm by BNI must be based on a clear and transparent work agreement.
4. Public Accountants who carry out audits of Bank Annual Financial Statements are required to carry out audits in accordance with the Professional Standards for Public Accountants and the provisions of work agreements, as well as the established audit scope. In addition, Public Accountants and/or Public Accounting Firms are required to maintain the confidentiality of Bank information in accordance with Law No. 7 of 1992 concerning Banking as amended by Law Number 4 of 2023 concerning the Development and Strengthening of the Financial Sector.
5. For the preparation and implementation of an audit of annual historical financial information for the Bank, the KAP is required to communicate with the OJK in the event that the KAP may request information from the OJK regarding the Bank and/or the OJK can inform the KAP about matters that need to be paid attention to in preparing and carrying out audits.
6. KAP is obliged to submit information requested by the OJK even though the work agreement has ended.

PUBLIC ACCOUNTING FIRM COMPANY PROFILE

Rintis, Jumadi, Rianto & Partners Accounting Firm (member firm of PricewaterhouseCoopers)/KAP RJRR. WTC 3, Jl. Jend. Sudirman Kav. 29-31 Jakarta 12920 Indonesia

Phone.: +62 21 50992901/31192901
Fax: +62 21 52905555/52905050

PUBLIC ACCOUNTING FIRM, NAME OF PUBLIC ACCOUNTANT, FEES, AND AUDIT OPINION [ACGS C.6.1]

A complete explanation regarding the Public Accounting Firm, the name of the Public Accountant, fees, KAP permits, and audit opinions on BNI's Annual Financial Statements for the last 5 (five) years is presented in the following table:

Year	Public Accounting Firm	Name of Accountant (Partner in Charge)***	Period of Assignment	Audit Service Fee (Rupiah)*	KAP Permit	Audit Opinion***
2025	KAP Rintis, Jumadi, Rianto & Partner (member firm of the PricewaterhouseCoopers network)	Jimmy Pangestu S.E., CPA	1 year	34,643,991,599**	315/KM.1/2024	Unqualified
2024	KAP Rintis, Jumadi, Rianto & Partner (formerly KAP Tanudiredja, Wibisana, Rintis & Partner and is a member firm of the PricewaterhouseCoopers network)	Jimmy Pangestu S.E., CPA	1 year	22,800,000,000	315/KM.1/2024	Unqualified
2023	KAP Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network)	Drs. M. Jusuf Wibisana M.Ec,. CPA	1 year	20,672,000,000	241/KM.1/2015	Unqualified
2022	KAP Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network)	Drs. M. Jusuf Wibisana, M.Ec,. CPA	1 year and Interim	25,550,000,000	241/KM.1/2015	Unqualified
2021	KAP Tanudiredja, Wibisana, Rintis & Partner (member firm of the PricewaterhouseCoopers network)	Drs. M. Jusuf Wibisana, M.Ec,. CPA	1 year and Interim	22,175,000,000	241/KM.1/2015	Unqualified

*) Fees include OPE, VAT, and other taxes
**) The calculation of audit fees for 2025 represents the total audit fees between KAP Rintis, Jumadi, Rianto & Rekan and other member firms of the PricewaterhouseCoopers network in relation to the audit engagement of BNI's overseas offices, where details of each type of assignment can be found in the Company Profile Chapter, Sub-chapter Information on Public Accountants, Public Accounting Firms, and Networks/Associations/Alliances in this Annual Report.
***) Information on the name of the Public Accountant (Engagement Partner) and the audit opinion for each respective year pertains to the consolidated audit engagement of PT Bank Negara Indonesia (Persero) Tbk.

Legal Cases

NUMBER OF LEGAL CASES FACED BY THE BANK IN 2025

Throughout 2025, BNI faced several legal issues, including civil cases accompanied by claims for payment/compensation against BNI, criminal cases that have entered the trial process, and tax cases, both those that have been resolved with permanent legal force (inkracht) and those still in the process of settlement, as follows:

Case Settlement Status	Number of Cases		
	Civil	Criminal	Tax
The case is settled and has permanent legal force	112	5	0
Cases under settlement process	289	9	1
Total	401	14	1

SIGNIFICANT LEGAL CASES FACED BY THE BANK IN 2025

Civil Litigation

Based on the table above, there are several significant civil cases faced by BNI, with the following details:

No.	Case	Main Case	Case Status	Risks and Impacts Faced by the Bank	Bank Management Efforts	Sanctions Imposed by the Authority	Case Value
1.	No. 112/Pdt.G/2021/PN.Amb **Between:** **Plaintiffs:** 1. Johny Widjaya 2. Elya Puspita 3. Jovelin Jaguenetta Widjaja 4. Fajar Madya 5. Muhamad La Bawe 6. Dustin Fendi Earja 7. Edwin Dorsalam Against **Defendant:** BNI	Lawsuit for unlawful acts related to alleged negligence by BNI that resulted in the theft of customer funds by a BNI employee who has been found guilty of criminal acts based on a court ruling.	The case has been concluded at the level of Review at the Indonesian Supreme Court.	BNI was ordered to pay in accordance with the value of the Second Review Decision, namely IDR 115.3 million, but this did not have a significant impact on BNI.	BNI will implement the contents of the Second Review Decision.	None	Material: IDR 29,777,316,513 Inmaterial: -

No.	Case	Main Case	Case Status	Risks and Impacts Faced by the Bank	Bank Management Efforts	Sanctions Imposed by the Authority	Case Value
2.	No. 220/ Pdt.G/2023/ PN.Mnd **Between**: **Plaintiff:** John Hamenda Against **Defendants:** 1. BNI Kebayoran Baru Branch Office 2. BNI Head Office 3. North Sulawesi Provincial BPN 4. Head of the Manado City Land Office **Co-Defendants:** 1. Dirtipideksus Polri 2. Head of South Jakarta District Attorney's Office 3. Mrs. Malputongekel 4. Bank Danamon Manado Branch 5. Bank Danamon Jakarta Regional Office 6. Notary PPAT Thelma Andries, S.H.	Lawsuit against BNI for unlawful acts due to blocking and placing a sign on the disputed property located on Jalan 17 Agustus, Kelurahan Bumi Beringin, Kec. Wenang, Kota Manado, with proof of ownership in the form of SHM No. 206/Bumi Beringin, dated June 20, 1995, in the name of John Hamenda.	The case has been concluded at the Cassation level at the Supreme Court of the Republic of Indonesia.	There are no risks and impacts faced by BNI given that the Supreme Court Decision basically states that the Plaintiff's lawsuit is unacceptable and has the force of law (inkracht).	BNI was declared the winner in accordance with the Cassation Decision of the Supreme Court of the Republic of Indonesia. The Supreme Court of the Republic of Indonesia	None	Material: IDR572,500,000,000 Immaterial: IDR1,000,000,000,000
3.	No. 740/ Pdt.G/2023/ PN.Jkt.Pst **Between**: **Plaintiff:** PT Zeus Citra International Against **Defendant:** BNI **Co-Defendants:** 1. State Property and Auction Service Office (KPKNL) Jakarta III 2. PT Bali Auction House	Claim Action Against The law due to the rejection by BNI of the request for additional credit facilities submitted by the Plaintiff and the Plaintiff's objection to the auction conducted by BNI, which caused losses to the Plaintiff.	The case has been concluded at the Cassation level at the Supreme Court of the Republic of Indonesia.	There are no risks and impacts faced by BNI given that the Supreme Court Decision basically states that the Plaintiff's lawsuit is unacceptable and has the force of law (inkracht).	BNI was declared the winner in accordance with the Cassation Decision of the Supreme Court of the Republic of Indonesia. The Supreme Court of the Republic of Indonesia	None	Material: IDR1,392,731,803,391 Immaterial: IDR500,000,000,000

Throughout 2025, BNI did not face significant risks related to legal issues, and based on the 2025 legal risk profile assessment, it was ranked at level 1 (low).

Criminal Cases

Throughout 2025, BNI has fulfilled its reporting obligations regarding legal cases involving customers, employees, and third parties, covering alleged criminal acts of embezzlement, fraud, destruction of property, forgery, money laundering, cybercrimes (ITE), banking crimes, and corruption. All such reports have been handled in accordance with applicable legal procedures. Nevertheless, it is important to note that there were no criminal cases of a significant nature nor any that had a material impact on BNI's operations or reputation throughout the reporting period.

LEGAL CASES INVOLVING MEMBERS OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS

Throughout 2025, all currently serving members of the Board of Commissioners and the Board of Directors of BNI have never been involved or implicated in any legal cases or disputes, whether civil or criminal. This reflects the integrity, professionalism, and full commitment of BNI's management in maintaining stakeholder trust and ensuring sound corporate governance.

LEGAL CASES FACED BY SUBSIDIARIES IN 2025

In 2025, several of BNI's Subsidiaries were recorded as being involved in a number of legal cases, both civil and criminal, relating to operational activities or contractual relationships. Some cases have received final and binding court decisions (inkracht), while others are still in the process of settlement at various levels of the judiciary. The details of each legal issue are as follows:

Subsidiaries	Case Settlement Status	Number of Cases	
		Civil	Criminal
PT BNI Life Insurance	The case is settled and has permanent legal force	17	7
	Cases under settlement process	12	12
	Total Number of Cases	29	19
PT BNI Sekuritas	The case is settled and has permanent legal force	-	-
	Cases under settlement process	-	-
	Total Number of Cases	-	-
PT BNI Asset Management	The case is settled and has permanent legal force	-	-
	Cases under settlement process	1	-
	Total Number of Cases	1	-
PT BNI Multifinance	The case is settled and has permanent legal force	5	23
	Cases under settlement process	8	228*
	Total Number of Cases	13	251
PT Bank Hibank Indonesia	The case is settled and has permanent legal force	4	-
	Cases under settlement process	3	-
	Total Number of Cases	7	-
PT BNI Modal Ventura	The case is settled and has permanent legal force	-	-
	Cases under settlement process	-	-
	Total Number of Cases	-	-

Notes
*) For 228 criminal cases, there were 157 public complaints (DUMAS) and 67 police reports filed by each branch with recovery targets. In addition, there were four police reports related to internal fraud issues.

Of all ongoing and completed cases, there were no civil and/or criminal cases that were deemed to have the most significant impact on BNI and its Subsidiaries as the Main Entities.

LEGAL CASES FACED BY MEMBERS OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS OF BNI'S SUBSIDIARIES

All serving members of the Board of Commissioners and the Board of Directors of BNI's subsidiaries in 2025 have never been involved or implicated in any civil and/or criminal cases and/or disputes.

IMPACT OF LEGAL ISSUES ON THE BANK AND ITS SUBSIDIARIES

Throughout 2025, BNI faced several legal issues; however, none had a material impact on the status, position, or business continuity of BNI or its subsidiaries. BNI has been able to maintain operational stability and resolve every legal matter in accordance with applicable regulations without disrupting business activities. This condition reflects BNI's resilience and commitment to managing legal risks proactively and effectively, while simultaneously ensuring business sustainability and maintaining stakeholder trust

EFFORTS TO MINIMIZE LEGAL RISKS

BNI consistently strives to minimize legal risks that may arise from its business activities through several measures, including:

1. Strengthening procedures, policies, agreements, and legal issue management for optimal risk management, protecting the Bank's interests at the pre-transaction, transaction, and post-transaction stages of business activities.
2. Optimizing the legal function in providing legal reviews for credit submissions decided by the Credit Committee to ensure that credit transactions are conducted prudently from a legal perspective, improving credit quality, and supporting business target achievement.
3. Enhancing the role of the legal units at the Head Office and Regional Offices in supporting the smooth business and operational activities of the entire Bank organization.
4. Regularly updating standard legal documentation, such as credit agreements and accessory agreements, to anticipate legal risks resulting from contractual weaknesses and protect the Bank's legal interests.
5. Maximizing efforts to minimize legal risks within business units, including fraud prevention, through preventive measures such as increasing employee legal awareness through legal discussions, education, webinars, and sharing sessions on legal issues.
6. Collaborating with reputable external legal consultants, senior advisors, and State Attorney Lawyers (JPN) to optimize legal advice and assistance in protecting the Bank's legal interests.
7. Enhancing the competencies of legal staff at the Head Office and Regional Offices in providing legal advice and handling cases to create a professional, reliable legal team that supports the Bank's transformation.

LEGAL VIOLATIONS RELATED TO EMPLOYMENT, CONSUMERS, BANKRUPTCY, COMMERCIAL ISSUES, COMPETITION, AND/OR ENVIRONMENTAL MATTERS [ACGS: (P)B.1.1]

Throughout 2025, BNI has not committed any legal violations related to employment, consumers, bankruptcy, commercial matters, competition, and/or environmental issues.

Adminstrative Sanction

ADMINISTRATIVE SANCTIONS FROM THE FINANCIAL SERVICES AUTHORITY AND/OR OTHER REGULATORS

Throughout 2025, neither BNI nor its Board of Directors and Commissioners received any administrative sanctions, whether material or non-material, from the Financial Services Authority (OJK) or other regulators. This reflects BNI's consistent regulatory compliance, including provisions governing information disclosure and regulatory reporting. BNI also demonstrated strong discipline in fulfilling its obligations to disclose material events within the timelines stipulated by regulators, and accordingly did not incur any sanctions related to non-compliance with transparency requirements.

This achievement demonstrates that BNI's compliance framework and internal control system are operating effectively. All business activities and strategic decisions are consistently carried out within a prudent governance framework, aligned with the principles of transparency, accountability, responsibility, independence, and fairness. Accordingly, management is able to maintain an appropriate balance between business interests and regulatory obligations.

ADMINISTRATIVE SANCTIONS RECEIVED BY MEMBERS OF THE BOARD OF DIRECTORS AND MEMBERS OF THE BOARD OF COMMISSIONERS OF BNI

Throughout 2025, none of the incumbent members of BNI's Board of Directors or Board of Commissioners received any administrative sanctions from the regulator.

ADMINISTRATIVE SANCTIONS FROM THE FINANCIAL SERVICES AUTHORITY AND OR OTHER REGULATORS IMPOSED ON BNI SUBSIDIARIES

In 2025, there were no material administrative sanctions imposed by the Financial Services Authority (OJK) that could have affected the business continuity of the subsidiaries.

ADMINISTRATIVE SANCTIONS RECEIVED BY MEMBERS OF THE BOARD OF DIRECTORS AND MEMBERS OF THE BOARD OF COMMISSIONERS OF SUBSIDIARIES

Throughout 2025, none of the incumbent members of the Board of Directors or Board of Commissioners of BNI's subsidiaries received any administrative sanctions from the regulator.

TAX SANCTIONS

Throughout 2025, BNI was not subject to any tax audits, so there were no tax assessments that BNI had to settle.

SANCTIONS RELATED TO LISTING REGULATIONS

Throughout 2025, BNI did not receive any sanctions from regulators in relation to violations of listing regulations. BNI continues to strengthen the application of prudential principles through enhancements in the quality of reporting and record keeping systems, the reinforcement of the compliance function, and ongoing monitoring.

SANCTIONS FOR NON COMPLIANCE WITH LAWS OR REGULATIONS RELATED TO SIGNIFICANT OR MATERIAL RELATED PARTY TRANSACTIONS

Throughout 2025, there were no sanctions for non-compliance with laws or regulations relating to transactions with significant or material related parties associated with BNI.

BNI has policies and procedures in place to ensure that transactions with significant or material related parties are carried out in accordance with applicable laws and regulations .

REGULATORY SANCTIONS RELATED TO MATERIAL EVENTS

Throughout 2025, BNI did not receive any sanctions from regulators related to material events. BNI has fulfilled its obligations for information disclosure, publication, announcements, and notifications to both the public and regulators in accordance with the applicable provisions and prescribed timeframes for material events.

Access to Company Information and Data [ACGS C.7.1, C.7.2, C.7.3, C.7.4, C.10.1]

BNI consistently maintains effective communication with regulators, shareholders, customers, employees, business partners, and the wider community as part of its commitment to the principles of transparency and accountability. These stakeholder relations are conducted in accordance with BNI's Communication Policy.

To strengthen effective communication, BNI has established an Investor Relations unit that plays a key role in safeguarding the Bank's reputation through ongoing engagement with investors and analysts, while ensuring transparent disclosure of both financial and non financial performance. Information is delivered on a regular basis through various communication channels, including the corporate website in Indonesian and English, mass media, mailing lists, newsletters, analyst meetings, the website of the IDX, and the General Meeting of Shareholders. The presence of the Investor Relations function enables stakeholders to access information that is timely, accurate, and credible.

Access to company information and data related to BNI's corporate actions can be obtained through:

BNI Official Website	Telephone	Faximile	E-Mail
http://bni.co.id	021-5728387	021-5728053	ir@bni.co.id

PRESS RELEASE [ACGS C.7.4]

BNI recognizes that mass media plays a strategic role in disseminating information related to the Bank's journey, developments, and performance achievements. The media not only serves as a communication channel but also acts as a strategic partner in building reputation, strengthening brand image, and fostering public and investor confidence in BNI. Accordingly, BNI consistently maintains harmonious relationships with the media through various routine activities, including the distribution of press releases, press conferences, media gatherings, and management interviews on strategic issues as well as the Bank's performance achievements.

In its implementation, BNI ensures that all information conveyed to the media is accurate, transparent, and in compliance with regulatory requirements, and is able to reach a broad audience through print, electronic, and digital media, as well as BNI's official channels. These strong media relations represent one of the manifestations of good corporate governance (GCG) principles, particularly transparency and accountability, while supporting the sustainability of the Bank's business and strengthening BNI's position as one of Indonesia's leading financial institutions.

In 2025, BNI released a total of 308 press release articles, detailed as follows:

No.	Date	Title	Place
1.	January 2, 2025	Closing 2024, Here Are BNI's Achievements in Strengthening Consumer and Corporate Businesses to Support Economic Growth	Jakarta
2.	January 2, 2025	Five Key Strategies BNI Uses to Face the Challenges of 2025	Jakarta
3.	January 4, 2025	After 37 Years in Operation, an Indonesian Restaurant in Hong Kong Renovates with BNI Diaspora Loan	Jakarta
4.	January 7, 2025	BNI Digital Ambassadors Help Indonesian Migrant Workers in Hong Kong Become Financially Literate	Jakarta
5.	January 8, 2025	Palembang Entrepreneur Expands Culinary Business in Seoul Using BNI Diaspora Loan	Jakarta
6.	January 14, 2025	Supporting the Priority Program of 3 Million Homes, BNI Targets the Distribution of FLPP Mortgages for 10,750 Housing Units	Jakarta
7.	January 20, 2025	BNI Supports the Distribution of KUR for Indonesian Migrant Workers	Jakarta
8.	January 20, 2025	How BNI Empowers Indonesian Migrant Workers in Hong Kong Through Training Programs	Jakarta

No.	Date	Title	Place
9.	January 21, 2025	Supporting Prabowo's Asta Cita Through Human Capital Development, BNI Cultivates the Potential of Young Indonesian Badminton Athletes	Jakarta
10.	January 21, 2025	Supporting President Prabowo's Asta Cita, BNI Strengthens Corporate Governance and Anti-Corruption Efforts	Jakarta
11.	January 22, 2025	Digital Transformation Drives Growth in Savings, BNI Records IDR21.5 Trillion in Profit Throughout 2024	Jakarta
12.	January 23, 2025	Realizing Asta Cita by Strengthening Human Resources, BNI Promotes Gender Equality in the Workplace	Jakarta
13.	January 23, 2025	BNI Wins the Best Operational Bank Award for State Cash Management	Jakarta
14.	January 23, 2025	BNI BUMI Program Supports Prabowo's Asta Cita to Boost the Green Economy	Jakarta
15.	January 28, 2025	Create Your Own Luck! Lunar New Year 2025 Brings a Wave of Rewards from BNI	Jakarta
16.	January 30, 2025	Get Cashback, Tuition Payments Become More Practical with wondr by BNI	Jakarta
17.	February 4, 2025	BNI Invites Customers and Business Partners to Achieve Boundless Prosperity in the Year of the Wood Snake	Jakarta
18.	February 5, 2025	BNI Remittance Simplifies Migrant Workers' Access to Financial Services Overseas	Jakarta
19.	February 6, 2025	Strengthening ESG, BNI Accelerates the Growth of Sustainable Financing	Jakarta
20.	February 7, 2025	BNI Promotes Equitable Rural Economic Growth Through the BNI Dedikasi Program	Jakarta
21.	February 10, 2025	BNI Diaspora Heroes Awardee in South Korea Successfully Opens and Expands a Nusantara Food Stall	Jakarta
22.	February 11, 2025	Buy ORI027 Using wondr by BNI, More Practical with Attractive Cashback of Up to IDR27 Million	Jakarta
23.	February 11, 2025	BNI Jejak Kopi Khatulistiwa Supports Garut Coffee Toward Food Self-Sufficiency and Global Expansion	Jakarta
24.	February 12, 2025	Catering to the Refined Lifestyle of Japanese Enthusiasts, BNI Wins Two Awards from JCB	Jakarta
25.	February 12, 2025	Closing the Lunar New Year Customer Gathering Series, BNI Encourages Customers to Earn More in 2025	Jakarta
26.	February 13, 2025	Preventing Stunting, BNI Provides Nutritious Meals and Smart Parenting Programs in Tasikmalaya	Jakarta
27.	February 13, 2025	BNI Wins Two Alpha Southeast Asia 2024 Awards Through Trade Finance Solutions and Cross-Border Transactions	Jakarta
28.	February 16, 2025	BNI Enters the List of Asia Pacific's 500 Best Companies by TIME	Jakarta
29.	February 16, 2025	Making New History, BNI Appreciates Indonesia's Victory at the 2025 Badminton Asia Mixed Team Championship	Jakarta
30.	February 18, 2025	Strengthening Digitalization Synergy, BNI and ACC Establish Cooperation for Autopay Services	Jakarta
31.	February 18, 2025	BNI Disburses Supply Chain Financing for APP Group Partners	Jakarta
32.	February 19, 2025	Partnering with Halu Oleo University Kendari, BNI Strengthens Digital Services Through the Campus Financial Ecosystem Program	Jakarta
33.	February 22, 2025	Solid Fundamentals, BNI Is Ready to Compete and Continue Innovating	Jakarta
34.	February 25, 2025	BNI Preserves the Cultural Heritage of Weaving Through Support for the Cita Raya HIKAYAT Fashion Showcase	Jakarta
35.	February 25, 2025	Supporting the Expansion of Electric Vehicles in Indonesia, BNI Establishes Cooperation with Geely	Jakarta
36.	February 26, 2025	BNI Supports BUMN Bakti Volunteers in Pamekasan, Empowering MSMEs and Protecting the Environment	Jakarta
37.	February 27, 2025	Providing Financial Literacy, BNI Shares Investment Tips for Generation Z	Jakarta
38.	February 28, 2025	After 42 Years of Operation, BNI New York Relocates	Jakarta
39.	February 28, 2025	Solid Fundamentals at the Start of 2025, BNI's Net Profit Grows 9.7% Year on Year in January	Jakarta
40.	February 28, 2025	BNI Partners with Three Supermarkets to Hold Shopping Race 2025	Jakarta
41.	March 3, 2025	BNI Announces Changes to Operating Hours to Ensure Smooth Banking Transactions During Ramadan	Jakarta
42.	March 3, 2025	Welcoming Ramadan, wondr by BNI Offers 0% Credit Card Installments, KAI Ticket Cashback, and Promotions Across Various Merchants	Jakarta
43.	March 4, 2025	Encouraging Strategic Infrastructure Project Financing, BNI and SMI Establish a Repo Cooperation of IDR550M	Jakarta
44.	March 5, 2025	From Papua to Medan, BNI Holds Ramadan Safari 2025 in 14 Cities Across Indonesia	Jakarta
45.	March 5, 2025	Enhancing Healthcare Service Innovation, BNI and GE Healthcare Sign Cooperation on Financial Solutions	Jakarta

No.	Date	Title	Place
46.	March 6, 2025	30 Years Assisting Customers in Planning for Retirement, DPLK BNI Wins the Brand for Good Award	Jakarta
47.	March 7, 2025	BNI Holds a Lucky Draw for BNI JCB Ultimate and Precious Credit Cards with Prizes Including Flights and Universal Studios Japan	Jakarta
48.	March 7, 2025	BNI Becomes the Only Bank from Indonesia to Win the Asia Sustainability Reporting Awards 2024	Jakarta
49.	March 9, 2025	BNI Becomes the First and Only Indonesian Bank to Receive a Literacy Award from the Hong Kong Monetary Authority	Jakarta
50.	March 9, 2025	BNI Distributes Basic Necessities and Cleaning Equipment for Flood Victims in Bekasi	Jakarta
51.	March 10, 2025	BNI and VinFast Sign an MoU to Accelerate the Green Mobility Ecosystem in Indonesia	Jakarta
52.	March 11, 2025	BNI Prepares IDR21 Trillion in Cash for the 2025 Eid Period, Banking Services Remain Secure During the Holiday Season	Jakarta
53.	March 13, 2025	BNI Launches BNI Mitra10 Credit Card, Offering Rewards and Helping Customers Realize Their Dream Homes	Jakarta
54.	March 15, 2025	QRIS Tap Now Available via wondr by BNI, Making Public Transportation Even More Convenient	Jakarta
55.	March 18, 2025	BNI Invites Private Banking Customers to Watch the All England Badminton Championships Live in Birmingham	Jakarta
56.	March 18, 2025	Full Support from BNI Leads Indonesian Men's Doubles Pair to Reach the All England Final for the Eighth Consecutive Time	Jakarta
57.	March 20, 2025	Revealing Fraud Schemes Ahead of Eid, Sharing Tips to Prevent Financial Losses	Jakarta
58.	March 21, 2025	BNI Launches Wealth Management Services in Singapore, Partnering with Schroders and Fullerton	Jakarta
59.	March 22, 2025	Sobat Aksi Ramadan 2025, BNI Renovates Mosques and Provides Food Assistance	Jakarta
60.	March 22, 2025	BNI Turns Off Lights During Earth Hour 2025, Briefly Going Dark to Support Environmental Sustainability	Jakarta
61.	March 23, 2025	Limited BNI Operations During Nyepi Holiday and Eid al-Fitr 2025	Jakarta
	March 24, 2025	BNI Provides IDR20,000 Banknotes at 41 ATMs from Lampung to Papua	Jakarta
	March 26, 2025	BNI Annual General Meeting Approves Total Cash Dividends of IDR13.95 Trillion or IDR374 per Share	Jakarta
64.	March 27, 2025	Supporting the 2025 Free Homecoming Program, BNI Dispatches 121 Buses to Purwokerto and Padang	Jakarta
65.	March 27, 2025	Unique Design of wondr by BNI Goes Global, Wins the 2025 iF Design Award	Jakarta
	March 29, 2025	BNI Supports BUMN Homecoming Post at Tanjung Perak Port, Providing Free Meals and Medical Services	Jakarta
67.	March 29, 2025	BNI Operates BUMN Homecoming Post, Providing Comfort for Travelers at Balikpapan Port	Jakarta
68.	March 31, 2025	BNI Partners with Pelindo and Bulog Through the BUMN Homecoming Post at Parepare Port	Jakarta
	March 31, 2025	BNI Distributes 200 Free Iftar Meals and Health Services at the Malang Homecoming Post	Jakarta
70.	April 9, 2025	BNI's Strategies to Maintain Performance Amid Rupiah Depreciation	Jakarta
71.	April 10, 2025	With Support from BNI Xpora, IndoTropikal Ginger Candy Producer Penetrates Export Markets	Jakarta
72.	April 11, 2025	BNI Disburses IDR14.3 Trillion in KUR to the Food Sector, Supporting Food Self-Sufficiency and National Food Security	Jakarta
73.	April 15, 2025	Growing Strongly, BNI Premium Customer Savings Increase 16% in the First Quarter of 2025	Jakarta
74.	April 16, 2025	Top Up Balances and Increase Transactions, Rejeki wondr BNI Ready to Give Away Chery J6 and Mercedes-Benz	Jakarta
75.	April 18, 2025	BNI Indonesia's Horse Racing 2025 Combines Entertainment and Tourism to Drive National Economic Potential	Jakarta
76.	April 19, 2025	BNI Empowers Women with Disabilities Through Rumah BUMN Bekasi	Jakarta
77.	April 21, 2025	BNI Supports the Indonesian Badminton Team Competing in the 2025 Sudirman Cup	Jakarta
78.	April 22, 2025	BNI Promotes Environmentally Friendly MSMEs Through the 2025 BUMI Program	Jakarta
79.	April 25, 2025	BNI Strengthens Synergy with Customers and Business Players in Central Java to Face Global Economic Challenges	Jakarta
80.	April 25, 2025	BNI Wins Three Awards from The Digital Banker, Reinforcing the Strategic Role of BNIdirect	Jakarta
81.	April 25, 2025	BNI Leads idr1.84 Trillion Syndicated Loan to Build VinFast Electric Vehicle Plant in Indonesia	Jakarta
82.	April 26, 2025	BNI Partners with IKA ITS to Support the Advancement of Higher Education in Indonesia	Jakarta

No.	Date	Title	Place
83.	April 26, 2025	BNI Holds Shopping Race in 14 Cities, Driving Transaction Digitalization and Enhancing Customer Experience	Jakarta
84.	April 27, 2025	Rejeki wondr BNI Lottery Held at GIOI Wondrful Run, 500 Runners Enliven Sunday Morning CFD	Jakarta
85.	April 28, 2025	BNI Continues Solid Performance Growth, Loans and Savings Increase 10% in the First Quarter of 2025	Jakarta
86.	April 29, 2025	BNI Strengthens BUMN Digital Communication Through AI Optimization	Jakarta
86.	April 30, 2025	Maintaining Liquidity, BNI Balances Growth and Credit Risk Management Strategies	Jakarta
88.	May 1, 2025	BNI Xpora Brings Sumatra Coffee to the 2025 Specialty Coffee Expo in Houston	Jakarta
89.	May 2, 2025	Driving Transactions, the BNI–Emirates Travel Fair 2025 Returns with Various Attractive Offers	Jakarta
90.	May 4, 2025	Rejeki wondr BNI Event at Car Free Day, BNI Invites the Public to Stay Healthy While Winning Attractive Prizes	Jakarta
91.	May 4, 2025	BNI Records Increased Premium Customer Transactions at the BNI–Emirates Travel Fair 2025 Private Event	Jakarta
92.	May 5, 2025	Easier SMM PTN Barat Payments via the wondr by BNI App, Enjoy idr50 Thousand Cashback	Jakarta
93.	May 6, 2025	BNI Urges the Public to Be Alert to Fraud Disguised as Rejeki wondr BNI Prize Draws	Jakarta
94.	May 7, 2025	BNI Targets Young Investors to Manage Investments Through New BIONS	Jakarta
95.	May 8, 2025	BNI, the Ministry of Public Housing and Settlement Areas, KP2MI, and BPTapera Collaborate to Provide Affordable Mortgages for Migrant Workers	Jakarta
96.	May 15, 2025	BNI Migrant Worker Savings Increase 19.5% as of March 2025, Overseas Network Strengthens Access to Banking Services	Jakarta
97.	May 15, 2025	From Bekasi to Probolinggo, BNI Supports Infrastructure Improvements to Drive Rural Economic Growth	Jakarta
98.	May 16, 2025	BNI Provides Solutions to Help Businesses Accelerate Supply Chain Financing Through BNIdirect	Jakarta
99.	May 19, 2025	As the Main Partner for Indonesian Migrant Workers, BNI Records 13.15% Remittance Business Growth in the First Quarter of 2025	Jakarta
100.	May 20, 2025	BNI Holds a Golf Clinic to Strengthen Relationships with Next-Generation Private Banking Customers	Jakarta
101.	May 20, 2025	BNI Establishes Cooperation with Ismaya Group to Present Japanese Cuisine Directly with Chef Motokichi	Jakarta
102.	May 20, 2025	Realizing Food Security and Equitable Rural Economic Growth, BNI Forms Strategic Partnership with BUMDes Yogyakarta	Jakarta
103.	May 21, 2025	BNI Wins CIO of the Year Award at the 2025 ASEAN Fintech Awards, Strengthening Its Transformation Commitment	Jakarta
104.	May 22, 2025	Supporting Biodiversity, BNI GoGreen Conducts Mangrove Conservation to Boost the Local Economy in Banyuwangi	Jakarta
105.	May 23, 2025	Andien Enlivens BNI Java Jazz on The Move at Sarinah	Jakarta
106.	May 25, 2025	BNI and OJK Invite University Students to Improve Financial Literacy	Jakarta
107.	May 26, 2025	BNI's Strategies to Drive MSME Digitalization and Compete on the Global Stage	Jakarta
108.	May 26, 2025	BNI's Strategy to Maintain Liquidity and Drive Credit Growth Amid a Low Interest Rate Trend	Jakarta
109.	May 27, 2025	BNI Deposits Above idr5 Billion Increase 16%, Reflecting the Positive Contribution of Emerald Services	Jakarta
110	May 28, 2025	BNI and the Ministry of MSMEs Establish Cooperation to Strengthen Financial Services for Business Players	Jakarta
111	May 28, 2025	BNI Presents a Wondrful Experience to Celebrate 20 Years of Java Jazz	Jakarta
112	May 30, 2025	Collect Stamps in the wondr Treasure Hunt, an Exciting Rejeki wondr BNI Mission at the 2025 Java Jazz Festival	Jakarta
113	May 30, 2025	Enjoy 20% Discounts on BNI Java Jazz 2025 Merchandise with BNI Cards and QRIS	Jakarta
114	May 30, 2025	Andien and Jacob Collier Perform at the BNI Wondrhall Java Jazz Festival 2025	Jakarta
115	May 31, 2025	A Lineup of Top Musicians Headlines the BNI Java Jazz Festival 2025	Jakarta
116	May 31, 2025	Don't Forget to Buy Special Show Tickets with BNI Credit Cards at the BNI Java Jazz Festival 2025	Jakarta

No.	Date	Title	Place
117	May 31, 2025	A Variety of MSMEs Showcasing Archipelago Flavors Enliven the BNI Java Jazz Festival 2025	Jakarta
118	May 31, 2025	Saving While Enjoying Jazz, a Unique Way for BNI to Attract New Customers	Jakarta
119	May 31, 2025	Convenient Transactions with wondr by BNI at the BNI Java Jazz Festival 2025	Jakarta
120	June 1, 2025	The BNI Java Jazz Festival 2025 Generates Big Wins, BNI Customers Take Home Gold and Motorcycles	Jakarta
121	June 2, 2025	BNI-Assisted MSMEs Export 27 Tons of Ribbonfish to China	Jakarta
122	June 4, 2025	BNI Ensures Customer Financial Services Remain Safe and Comfortable Throughout the Eid al-Adha Holiday	Jakarta
123	June 4, 2025	BNI Achieves Zero Waste to Landfills, Realizing an Environmentally Friendly Office	Jakarta
124	June 5, 2025	BNI Strengthens Environmental Commitment on World Environment Day 2025	Jakarta
125	June 5, 2025	Make It Happen! Plan Your Hajj Pilgrimage Using wondr by BNI	Jakarta
126	June 5, 2025	Adnan-Indah Advance to the Quarterfinals of the 2025 Indonesia Open, Reflecting BNI-PBSI Collaboration to Advance Indonesian Badminton	Jakarta
127	June 7, 2025	Indonesian Men's Doubles Pair Advances to the Semifinals of the Indonesia Open, BNI-PBSI Continues to Support World-Class Athlete Achievements	Jakarta
128	June 8, 2025	Invest in Retail Sukuk SR022 via wondr by BNI and Enjoy Cashback of Up to idr15 Million	Jakarta
129	June 8, 2025	BNI Strengthens Its Strategic Role in Sustainable Financing for a Greener Future	Jakarta
130	June 8, 2025	Extraordinary Performance by Indonesian Men's Doubles in the Semifinals of the 2025 Indonesia Open	Jakarta
131	June 10, 2025	Commemorating Entrepreneurship Day, BNI Supports MSMEs to Scale Up Sustainably and Go Global	Jakarta
132	June 11, 2025	BNI's Tangible Contribution to the Infrastructure Sector, Supporting Connectivity and Equitable Economic Development	Jakarta
133	June 12, 2025	BNI Ready to Issue idr5 Trillion Sustainability Bonds to Strengthen Green and Social Financing	Jakarta
134	June 13, 2025	BNI Disburses IDR4.6 Trillion in KUR to More Than 20,000 MSMEs, Strengthening the Backbone of the National Economy	Jakarta
135	June 13, 2025	Cash Deposits at BNI CRM Are Now More Rewarding, Offering Cashback and a Chance to Win a Mercedes-Benz	Jakarta
136	June 14, 2025	BNI Brings Three Indonesian MSMEs to the Largest Food Exhibition in South Korea, Exploring Export Opportunities	Jakarta
137	June 14, 2025	BNI and Republikorp Establish Synergy to Promote National Defense Industry Self-Reliance	Jakarta
138	June 15, 2025	Synergy Between BNI and RANS Simba Bogor Produces Active and Financially Literate Young Generations	Jakarta
139	June 18, 2025	BNI Enters the 2025 Forbes Global 2000 List, Demonstrating Positive Performance Recognized Worldwide	Jakarta
140	June 18, 2025	BNI Strengthens the Campus Digital Financial Ecosystem While Disbursing CSR for UNSADA Students	Jakarta
141	June 22, 2025	BNI Receives International Recognition as One of the Best Companies to Work for in Asia	Jakarta
142	June 22, 2025	BNI Partners with BSP to Disburse KUR for 13,400 Plasma Farmers Across Three Provinces	Jakarta
143	June 25, 2025	Strengthening Funding Structure Through Digital Transformation, BNI's Digital Transactions Reach IDR764 Trillion	Jakarta
144	June 26, 2025	BNI Wins 16 Awards at the 2025 BSEA, Demonstrating Consistency in Service and Sustainable Innovation	Jakarta
145	June 26, 2025	BNI Xpora Drives Frinsa Coffee MSMEs to Penetrate Global Markets, Achieving Exports of US$1 Million	Jakarta
146	July 1, 2025	Contributing to the Digitalization of Public Services, BNI Wins Two Awards at the 2025 GovMedia Awards	Jakarta
147	July 3, 2025	MSCI Upgrades BNI's ESG Rating, Global Recognition of Green Commitment and Governance	Jakarta
148	July 4, 2025	79 Years of BNI, "Accompanying Every Step of Your Journey"	Jakarta
149	July 4, 2025	BNI Accelerates Green Financing, Portfolio Reaches idr13.37 Trillion	Jakarta
150	July 4, 2025	BNI Celebrates 79 Years of Service, From ORI Issuance to Digital Transformation for the Nation	Jakarta
151	July 5, 2025	BNI Introduces the New Face of BNI Private, Offering More Comprehensive and Personalized Wealth Management Services	Jakarta

No.	Date	Title	Place
152	July 6, 2025	BNI Comes Closer at Its 79th Anniversary, Greeting Customers to Celebrate the Journey of Growth Together	Jakarta
153	July 8, 2025	BNI Wins Best FX Bank Award for Retail and Corporate Segments in Southeast Asia	Jakarta
154	July 9, 2025	BNI Launches wondr Multicurrency Feature, Supporting Customers to Become Global Citizens	Jakarta
155	July 10, 2025	Shopping Gets More Exciting! BNI Shopping Race Takes Place in 14 Cities to Celebrate the 79th Anniversary	Jakarta
156	July 12, 2025	Celebrating the 79th Anniversary, BNI Offers Discounts from PIK to Bintaro	Jakarta
157	July 13, 2025	BNI Holds Collateral Asset Auctions, Opening Property Investment Opportunities Starting from IDR50 Million	Jakarta
158	July 16, 2025	BNI Ready to Assist MSMEs to Go Public Through the RISE To IPO Program	Jakarta
159	July 17, 2025	BNI Strengthens Funding Structure and Digitalization, Optimizing Opportunities from the Decline in Benchmark Interest Rates	Jakarta
160	July 20, 2025	BNI Supports the Red and White Village/Subdistrict Cooperative Program to Strengthen the People's Economy	Jakarta
161	July 21, 2025	BNI Disburses 25,000 FLPP Mortgage Units, Supporting the Government's 3 Million Homes Program	Jakarta
162	July 23, 2025	BNI Wins the 2025 BRAVO 500 Summit Awards for Digital Financial Inclusion Innovation	Jakarta
163	July 24, 2025	Liquidity Strengthening and Asset Quality Management Become the Foundation of BNI's Performance in the First Half of 2025	Jakarta
164	July 25, 2025	From Ecosystem to Economy, BNI Builds the Future Through Mangrove Forests	Jakarta
165	July 26, 2025	BNI Appreciates Fajar/Fikri's Victory at the 2025 China Open	Jakarta
166	July 27, 2025	BNI wondrX 2025 Presents an Integrated and Interactive Financial Experience for the Public	Jakarta
167	July 28, 2025	BNI Ensures the Security of Customer Funds and Data Related to PPATK's Dormant Account Blocking	Jakarta
168	July 29, 2025	BNI Holds wondr Futsal Series 2025 in Surabaya, Encouraging Young Talent and Digital Financial Inclusion	Jakarta
169	July 30, 2025	Beware of Digital Crime, BNI Reminds the Public to Protect Three Sensitive Data Points	Jakarta
170	August 3, 2025	BNI: Temporary Blocking of Dormant Accounts by PPATK Aims to Protect Customer Funds	Jakarta
171	August 4, 2025	BNI Encourages Indonesian Tennis Achievements on the Global Stage	Jakarta
172	August 6, 2025	BNI Simplifies Dormant Account Reactivation with No Fees Charged	Jakarta
173	August 7, 2025	BNI and SMF Integrate Digital Payment Services to Support the 3 Million Homes Program	Jakarta
174	August 7, 2025	BNI wondrX 2025 Presents Financial Service Innovations in One Integrated Expo	Jakarta
175	August 8, 2025	BNI Celebrates Its 79th Anniversary with Real Action to Green Tiris Beach	Jakarta
176	August 13, 2025	BNI Brings Global Financial Solutions for the Diaspora at the 2025 Diaspora Global Summit	Jakarta
177	August 13, 2025	BNI Announces the Winners of the First Phase of the Rejeki wondr Draw	Jakarta
178	August 15, 2025	BNI wondrX 2025 Officially Opens, Offering Attractive Mortgage, Auto Loan, and Travel Package Promotions	Jakarta
179	August 15, 2025	BNI and JCB Launch Premium Corporate Credit Cards for Japanese Companies in Indonesia	Jakarta
180	August 15, 2025	BNI Launches BNIdirect Bisnis, a Practical Digital Solution for MSMEs	Jakarta
181	August 16, 2025	On the Second Day of BNI wondrX 2025, BNI Ensures Easy and Free Access to ICE BSD	Jakarta
182	August 16, 2025	BNI Invites wondrX 2025 Visitors to Enjoy Japanese Culinary Experiences and Attractive Promotions	Jakarta
183	August 16, 2025	Affordable Flight Tickets and Shopping Promotions Become Top Attractions for BNI wondrX 2025 Visitors	Jakarta
184	August 16, 2025	BNI Distributes First-Phase Rejeki wondr BNI Prizes, Opportunities Remain Open Until February 2026	Jakarta
185	August 17, 2025	BNI Ensures Services Continue During the Collective Leave for the 80th Anniversary of the Republic of Indonesia	Jakarta
186	August 17, 2025	BNI Presents the Global Citizen Experience Through the wondr Multicurrency Feature at BNI wondrX 2025	Jakarta
187	August 17, 2025	BNI Presents wondrstage at Dukuh Atas, Enlivening the People's Celebration of the 80th Anniversary of the Republic of Indonesia	Jakarta
188	August 18, 2025	BNI wondrX 2025 Records Nearly 80 Thousand Visitors, Transactions Reach IDR 2.5 Trillion	Jakarta
189	August 19, 2025	BNI Supports the Utilization of AI to Strengthen BUMN Communications	Jakarta

No.	Date	Title	Place
190	August 24, 2025	BNI and ITB Hold a Community Run Ahead of the 2025 wondr ITB Ultra Marathon	Jakarta
191	August 24, 2025	BNI Strengthens Support for ITB and Alumni Through Inclusive Financial Innovations	Jakarta
192	August 25, 2025	BNI and ITB Hold the 180 KM wondr ITB Ultra Marathon, Promoting a Healthy and Inclusive Lifestyle	Jakarta
193	August 26, 2025	BNI Wins Two OJK Awards for Its Commitment to Financial Literacy	Jakarta
194	August 29, 2025	BNI Temporarily Closes Four Branch Offices in Jakarta Due to Demonstrations	Jakarta
195	August 29, 2025	BNI Disburses IDR5 Trillion in Facilities to Jamkrindo, Strengthening Support for MSME Financing and Strategic Projects	Jakarta
196	August 29, 2025	Viral Video Following Demonstrations at BNI Tower Pejompongan, BNI Ensures Customers and Employees Are Safe	Jakarta
197	September 1, 2025	BNI Strengthens Stunting Reduction Programs in NTT and Banten	Jakarta
198	September 3, 2025	BNI Strengthens Support for MSMEs Through Productive Credit and Digital Innovation	Jakarta
199	September 4, 2025	BNI Strengthens Green and Inclusive Commitments on National Customer Day	Jakarta
200	September 8, 2025	Digital Transformation and Credit Diversification Become Pillars of BNI's Performance in the First Half of 2025	Jakarta
201	September 8, 2025	Furniture MSMEs from Klaten Break into Export Markets with Support from BNI Xpora	Jakarta
202	September 10, 2025	BNI Strengthens Education Quality in NTB through Teacher Certification and Student Character Development	Jakarta
203	September 11, 2025	BNI Moves Swiftly to Distribute Emergency Aid for Flash Flood Victims in Bali and NTT	Jakarta
204	September 12, 2025	BNI Supports Government Policy to Withdraw idr200 Trillion to Strengthen Banking Liquidity	Jakarta
205	September 14, 2025	BNI Ready to Optimize idr55 Trillion to Support National Economic Growth	Jakarta
206	September 14, 2025	BNI and BNI Sekuritas Win Two International Euromoney Awards	Jakarta
207	September 14, 2025	BNI Appointed as Official Non-Cash Transaction Partner at IDW 2025	Jakarta
208	September 16, 2025	BNI Reminds the Public to Beware of Fake Job Vacancies	Jakarta
209	September 17, 2025	BNI Strengthens Integrity and GCG through a Compliance Forum with the KPK	Jakarta
210	September 17, 2025	BNI Achieves the Highest GCG Implementation Rating at the 16th IICD CG Conference & Award 2025	Jakarta
211	September 18, 2025	BNI Introduces the Simponi Feature on wondr by BNI to Simplify Pension Fund Management	Jakarta
212	September 18, 2025	BNI Ready to Accelerate Productive Lending Following BI's Interest Rate Cut	Jakarta
213	September 19, 2025	BNI and Pancasila University Launch Co-Branded Student Card	Jakarta
214	September 22, 2025	BNI Strengthens ESG Commitment through Orangutan Conservation and Forest Rehabilitation	Jakarta
215	September 24, 2025	BNI Adjusts USD Deposit Interest Rate to 4%, Offering Competitive Returns	Jakarta
215	September 25, 2025	BNI Inaugurates Emerald Center at PIM 1 to Strengthen Wealth Management Services	Jakarta
217	September 27, 2025	BNI Socializes Housing Credit Programs in Banten to Support the 3 Million Homes Target	Jakarta
218	September 27, 2025	5,000 Runners Enliven the 2025 wondr ITB Ultra Marathon, with 32 Professors Taking Part	Jakarta
219	September 28, 2025	BNI Supports the ITB Endowment Fund through the 2025 wondr ITB Ultra Marathon	Jakarta
220	September 28, 2025	BNI Promotes Transparency through Education on International Right to Know Day	Jakarta
221	September 28, 2025	wondr ITB Ultra Marathon Concludes Successfully, BNI–ITB Strengthen Collaboration in Education	Jakarta
222	October 2, 2025	BNI Strengthens the People's Economy and Environmental Sustainability in Ponggok Village	Jakarta
223	October 3, 2025	BNI Xpora Wins SME Development Program of the Year Award, Encouraging MSMEs to Enter Global Markets	Jakarta
224	October 3, 2025	BNI Encourages MSMEs to Move Up the Value Chain through AI Utilization Training	Jakarta
225	October 6, 2025	BNI Partners with Developers in Serang to Accelerate the 3 Million Homes Program	Jakarta
226	October 10, 2025	BNI Supports Cross-Border QRIS Expansion to Maintain Rupiah Stability	Jakarta
227	October 11, 2025	BNI Strengthens Digital Business Literacy through BNIdirect at the Investor Daily Summit 2025	Jakarta
228	October 14, 2025	BNI Dominates the 2025 Financial Services Basketball League: Men's Team Champions, Women's Team Runner-Up	Jakarta
229	October 14, 2025	BNI Supports BPJS Ketenagakerjaan in Enhancing Social Security Services through BNIdirect Cash	Jakarta

No.	Date	Title	Place
230	October 16, 2025	BNI Appreciates the Resilience of Indonesia's Young Squad at the 2025 BWF World Junior Mixed Team Championship	Jakarta
231	October 16, 2025	BNI Wins IDX Channel Anugerah Inovasi Indonesia 2025 for Sustainable Financial Innovation	Jakarta
232	October 17, 2025	BNI Supports the Development and Operation of a 500 MW Geothermal Power Plant Owned by PT Geo Dipa Energi	Jakarta
233	October 19, 2025	BNI Wins the Green Warrior Award at the ESG Now Awards 2025	Jakarta
234	October 20, 2025	BNI Presents Financial Literacy and Modern Transaction Experiences at TNI RUN 2025	Jakarta
235	October 21, 2025	232 Athletes from 15 Countries Ready to Compete at wondr by BNI Indonesia Masters 2025	Jakarta
236	October 22, 2025	BNI Successfully Facilitates National Mass Mortgage Signing, Driving MSME Financing and Job Creation	Jakarta
237	October 22, 2025	Malang-Based Animation Studio Breaks into Global Markets with BNI Financing Support	Jakarta
238	October 23, 2025	Local MSMEs Enliven wondr by BNI Indonesia Masters 2025 in Medan	Jakarta
239	October 23, 2025	BNI Records Solid Fundamental Performance in Q3 2025, with Digitalization and CASA as Growth Drivers	Jakarta
240	October 24, 2025	27,300 Runners Enliven the 2025 wondr Jakarta Running Festival, Demonstrating BNI Collaboration in Promoting National Sports Tourism	Jakarta
241	October 25, 2025	BNI and the Land Bank Agency Strengthen Strategic Collaboration to Accelerate National Development	Jakarta
242	October 26, 2025	wondr JRF 2025 Officially Kicks Off, BNI Invites 27,300 Runners to Drive the Economy and Protect the Environment	Jakarta
243	October 26, 2025	Synergy between BNI and Its Subsidiaries Strengthens MSME Competitiveness at the wondr JRF Expo 2025	Jakarta
244	October 28, 2025	BNI Makes wondr JRF 2025 an International-Class Sports Tourism Magnet	Jakarta
245	October 28, 2025	Supporting the 3 Million Homes Program, BNI Disburses 109 Thousand Subsidized Mortgages	Jakarta
246	October 29, 2025	Fajar/Fikri Finish as Runners-Up at the 2025 French Open, BNI Proudly Supports Indonesian Athletes on the Global Stage	Jakarta
247	October 31, 2025	BNI Strengthens Financial Inclusion and Digital Transactions through FinExpo 2025	Jakarta
248	October 31, 2025	BNI Supports the Expansion of Indonesian Diaspora Restaurants in the Netherlands through the Diaspora Loan Program	Jakarta
249	November 3, 2025	Indonesia Dominates wondr by BNI Indonesia Masters 2025, Demonstrating BNI's Commitment to Badminton Athlete Regeneration	Jakarta
250	November 3, 2025	BNI and ITS Promote Digital Education Philanthropy through the ITS Endowment Fund	Jakarta
251	November 5, 2025	3,000 Runners Enliven the 2025 wondr Surabaya ITS Run, BNI Drives the Local Economy and a Digital Healthy Lifestyle Culture	Jakarta
252	November 6, 2025	BNI Wins Award for Its Contribution to MSME Empowerment and Inclusive Village Finance	Jakarta
253	November 6, 2025	BNI Strengthens Productive and Inclusive Financing to Drive National MSME Growth	Jakarta
254	November 7, 2025	BNI Supports the National Film Industry through Collaboration with Iko Uwais in the Film TIMUR	Jakarta
255	November 9, 2025	BNI Proudly Supports Putri Kusuma Wardani's Achievement at the 2025 Hylo Open	Jakarta
256	November 10, 2025	BNI Supports National Food Security through Participation in Agrinex Expo 2025	Jakarta
257	November 10, 2025	BNI Encourages MSMEs to Move Up the Value Chain, Creating Economic Champions from Ngawi	Jakarta
258	November 12, 2025	wondr by BNI Indonesia International Challenge 2025 Becomes the Arena for 258 World-Class Athletes to Compete	Jakarta
259	November 13, 2025	BNI Disburses idr40.7 Billion in Housing Program Loans to Support MSMEs and the Real Sector	Jakarta
260	November 14, 2025	BNI Wins Leadership AA Award at the 2025 Indonesia ESG Leadership Awards	Jakarta
261	November 14, 2025	BNI Supports the Revival of the Creative Ecosystem through ICCF 2025 in Greater Malang	Jakarta
262	November 14, 2025	BNI Wins the Women in SDG's Action 2025 Award, Demonstrating a Strong Commitment to Poverty Alleviation	Jakarta
263	November 15, 2025	BNI Wins Two Awards at ICXA 2025 for Digital Innovation and Service Transformation	Jakarta
264	November 17, 2025	BNI Holds Phase 3 of the Shopping Race in 13 Major Cities, Driving Digital Literacy and Transactions	Jakarta

No.	Date	Title	Place
265	November 17, 2025	Gregoria Mariska Achieves a Hat-Trick at the Kumamoto Masters Japan, BNI Strengthens the Revival of Indonesian Badminton	Jakarta
266	November 19, 2025	BNI CorpU TV Knowledge Series: 9 Wondrs Webinar, Essential Soft Competencies for BNI Hi-Movers	Jakarta
267	November 24, 2025	BNI Launches Indonesia's First ESG Advisory Playbook, Accelerating the Green Transformation of the Palm Oil Industry	Jakarta
268	November 24, 2025	Young Indonesian Athletes Harvest Titles at the 2025 Australia Open International Tournament	Jakarta
269	November 24, 2025	Indonesia Dominates the Podium at the wondr by BNI International Challenge, Youth Athlete Development Bears Fruit	Jakarta
270	November 24, 2025	BNI Drives the Local Economy through MSMEs at an International Event in Yogyakarta	Jakarta
271	November 26, 2025	BNI Presents Exclusive Access to the 2025 wondr Bright Cup through Buy 1 Get 2 Offers on wondr by BNI	Jakarta
272	November 27, 2025	BNI Distributes Emergency Relief Aid for Flash Flood Victims in Padang and Sibolga	Jakarta
273	November 27, 2025	BI Appreciates BNI's Contribution to the Consumer Protection Education Movement	Jakarta
274	November 28, 2025	BNI Earns the Title of The Most Trusted Company at the 2025 CGPI Awards	Jakarta
275	November 28, 2025	BNI Receives the 2025 Digital Transformation Driver Award for Innovations through wondr by BNI	Jakarta
276	November 28, 2025	BNI and the Ministry of Manpower Strengthen Youth Talent Development, Engaging 4,103 Apprenticeship Program Participants	Jakarta
277	November 30, 2025	BNI Wins the Environment & Sustainability Award, Strengthening Its Position as a Driver of Sustainable Finance	Jakarta
278	November 30, 2025	BNI Xpora Strengthens the Capacity of Gorontalo MSMEs to Scale Up and Penetrate Export Markets	Jakarta
279	November 30, 2025	Raymond/Joaquin Make a Brilliant Debut at the BWF Super 500 Level	Jakarta
280	December 3, 2025	BNI Wins Two BI Awards 2025, Strengthening Its Role in National Financial System Stability	Jakarta
281	December 3, 2025	BNI Ensures Services in Sumatra Return to Normal Following Floods	Jakarta
282	December 3, 2025	BNI Distributes Emergency Relief Aid for Disaster Victims in West Sumatra, with Ongoing Monitoring and Support	Jakarta
283	December 5, 2025	TIMUR Officially Premieres, BNI Brings Fresh Energy to the National Action Film Industry with Iko Uwais	Jakarta
284	December 5, 2025	BNI Strengthens Disability Empowerment through Business Support and Inclusive MSME Programs	Jakarta
285	December 5, 2025	wondr Bright Cup 2025 Held, BNI Expands Support for the National Sports Ecosystem	Jakarta
286	December 6, 2025	BNI Encourages Financial Literacy and MSME Advancement through Participation in NFHE 2025	Jakarta
287	December 6, 2025	Jojo–Ginting Invites Audiences to Play Badminton Together at the 2025 wondr BrightUp Cup	Jakarta
288	December 9, 2025	BNI Expands Emergency Relief Assistance for Disaster Victims in Sumatra	Jakarta
289	December 10, 2025	BNI Reaffirms Its Anti-Corruption Commitment at the Peak of Hakordia 2025 in Yogyakarta	Jakarta
290	December 10, 2025	Commitment to Prevent Corruption: Munadi Herlambang Represents BNI and Wins The Most Trusted Company at the 2025 CGPI Awards	Jakarta
291	December 12, 2025	BNI Wins Two ARA 2024 Awards, Strengthening Its Commitment to Good Corporate Governance	Jakarta
292	December 13, 2025	BNI Drives Digitalization and Transparency in the FMCG Supply Chain	Jakarta
293	December 13, 2025	BNI Receives Appreciation from the Ministry of MSMEs for Encouraging Businesses to Enter Global Markets	Jakarta
294	December 14, 2025	BNI Supports Sean Gelael's Start of the 2026 Racing Season through the Le Mans Series	Jakarta
295	December 14, 2025	BNI Supports the Creative Industry, Nationwide Movie Screenings of TIMUR Welcomed Enthusiastically by Audiences	Jakarta
296	December 15, 2025	BNI Holds an Extraordinary General Meeting of Shareholders, Strengthening Transformation and Governance in Preparation for 2026	Jakarta
297	December 16, 2025	BNI Wins Two International Awards for Human Capital Development	Jakarta
298	December 19, 2025	BNI Volunteers Join the BUMN Peduli Initiative, Supporting the Recovery of Disaster-Affected Communities in Aceh	Jakarta
299	December 20, 2025	BNI and BUMN Peduli Rapidly Deliver Tangible Assistance to Disaster-Affected Communities in Sumatra	Jakarta

No.	Date	Title	Place
300	December 20, 2025	BNI Reaches Aceh, Distributing School Uniforms and Providing Trauma Healing Facilities	Jakarta
301	December 23, 2025	BNI Prepares IDR19.51 Trillion in Cash Ahead of the Christmas and New Year Holidays	Jakarta
302	December 23, 2025	BNI Reaffirms Its Status as an Informative Public Institution for Three Consecutive Years	Jakarta
303	December 24, 2025	BNI Provides Trauma Healing for Children Affected by Floods in Southeast Aceh	Jakarta
304	December 24, 2025	BNI Strengthens Its Role in the Housing Program, Ready to Disburse 17,356 FLPP Mortgages in 2026	Jakarta
305	December 24, 2025	Beware of Fake Christmas Greetings, BNI Urges Customers Not to Click Links Carelessly	Jakarta
306	December 29, 2025	BNI Named a Strategic Partner for Digital Campuses at the 2025 Diktisaintek Awards	Jakarta
307	December 29, 2025	BNI Prepares Credit Relaxation for Debtors Affected by Disasters in Sumatra	Jakarta
308	December 30, 2025	BNI Establishes Health Posts to Support the Recovery of Communities Affected by Flash Floods in Aceh	Jakarta

CORPORATE COMMUNICATION PRESS CONFERENCE

No.	Date	Titile	Venue
1.	January 22, 2025	BNI FY2024 Performance Overview	Jakarta
2.	April 16, 2025	Rejeki wondr by BNI Program	Menara BNI Pejompongan
3.	April 28, 2025	Earning Call Q1 2025	Grha BNI
4.	May 28, 2025	BNI Java Jazz Festival 2025,	Jakarta
5.	August 7, 2025	BNI wondrX 2025	Patio Venue, Wijaya
6.	August 24, 2025	wondr ITB Ultra Marathon 2025	Grha BNI
7.	September 8, 2025	Public *Expose*	Jakarta
8.	October 24, 2025	3Q2025 Performance Report	Grha BNI, Jakarta.
9.	October 23, 2025	wondr Jakarta Running Festival	Jakarta

SOCIAL MEDIA

BNI leverages social media as one of its primary communication channels to reach and engage with the broader public. Through various digital platforms, including Instagram (Quickpose), BNI consistently disseminates information regarding corporate activities and policies, introduces products and services, and educates the public on financial and banking literacy. BNI's presence on social media functions not only as a medium for information dissemination, but also as a two way interaction platform that enables the public to convey aspirations, inquiries, and needs in a timely and responsive manner.

Through focused digital communication, BNI is able to build closer relationships with stakeholders while fostering a positive corporate image in the public eye. The following is a list of BNI's social media postings, totaling 332 post.

No	Date	Title	Publication Links
1	January 1, 2025	Happy New Year 2025	https://www.instagram.com/p/DEQ5LRGBL3G/
2	January 2, 2025	Get a Head Start—Get Ready to Apply for Your 2025 Leave	https://www.instagram.com/p/DET5hGxheWS/?img_index=1
3	January 6, 2025	BNI's 2024 Achievements: The Result of Sustainable Transformation	https://www.instagram.com/p/DEeF8u-h1bo/?img_index=2
4	January 15, 2025	37 Years in Business, Indonesian Restaurant in Hong Kong Renovates with BNI Diaspora Loan	https://www.instagram.com/p/DE1RRZyhEuY/?img_index=2
5	January 15, 2025	BNI Investor Daily Round Table: Growing Stronger Amid Domestic Challenges and Global Pressures	https://www.instagram.com/p/DE1W_hnhzE3/
6	January 16, 2025	Economic Dialogue: Coordinating Minister for Economic Affairs and BNI President Director Discuss Challenges and Opportunities	https://www.instagram.com/p/DE4b1w1B3-I/?img_index=2
7	January 16, 2025	Inspiring News Maker 2024	https://www.instagram.com/p/DFCw12ChzvJ/?img_index=2
8	January 20, 2025	Supported by BNI Diaspora Loan, Dapur Van Java Ready to Expand Indonesian Culinary Business	https://www.instagram.com/p/DFC8wenhf4h/?img_index=

No	Date	Title	Publication Links
9	January 20, 2025	BNI for Indonesian Diaspora: Empowering Migrant Workers in Hong Kong Through Beauty Class Training	https://www.instagram.com/p/DFC8wenhf4h/?img_index=2
10	January 21, 2025	Igniting the Champion's Spirit – Indonesia Masters 2025	https://www.instagram.com/p/DFFGI5shg7L/
11	January 21, 2025	BNI's Commitment to the Successful Distribution of KUR for Migrant Workers	https://www.instagram.com/p/DFFI4dfhvCJ/
12	January 22, 2025	BNI's Support for the Development of Indonesian Badminton Achievements	https://www.instagram.com/p/DFIV5f1BFJb/?img_index=2
13	January 22, 2025	Supporting President Prabowo's Asta Cita, BNI Strengthens Corporate Governance and Anti-Corruption Efforts	https://www.instagram.com/p/DFIWWyQhF8K/
14	January 22, 2025	Digital Transformation Drives Savings Growth as BNI Records IDR21.5 trillion Profit in 2024	https://www.instagram.com/p/DFIZKPihW7-/
15	January 23, 2025	Realizing Asta Cita: Strengthening Human Capital Through Gender Equality in the Workplace	https://www.instagram.com/p/DFKL6mhBkn1/
16	January 23, 2025	Advancing the Green Economy, BNI BUMI Program Supports President Prabowo's Asta Cita	https://www.instagram.com/p/DFKujGvhDNN/
17	January 24, 2025	Receiving Ministry of Finance Award, BNI Named the Best Operational Bank for State Cash Management	https://www.instagram.com/p/DFM6_tiBM84/
18	January 26, 2025	Good Luck in the Match, Jonathan Christie, Fajar Alfian, and Muhammad Rian Ardianto	https://www.instagram.com/p/DFRjMXXB83x/
19	January 26, 2025	Achievements of Indonesian Badminton Athletes at the Indonesia Masters 2025	https://www.instagram.com/p/DFSrNjEhIVu/?img_index=1
20	January 27, 2025	Happy Isra Mi'raj 1446 H	https://www.instagram.com/p/DFT1AZtBeen/
21	January 29, 2025	Happy Chinese New Year 2025	https://www.instagram.com/p/DFY-pMQhuGN/
22	January 29, 2025	Create Your Own Luck	https://www.instagram.com/p/DFZFa6xBm3v/
23	January 29, 2025	Create Your Own Luck	https://www.instagram.com/p/DFbxL2Jh6Zb/
24	January 29, 2025	100 Days of Building the Nation with Strong Momentum	https://www.instagram.com/p/DFaUe7jBVCk/
25	February 2, 2025	The Nation's Future Lies in the Hands of the Young Generation, BNI Actively Supports the Golden Generation of Indonesia	https://www.instagram.com/p/DFj3HMahOrT/?img_index=1
26	February 2, 2025	Congratulations on the Achievements of Indonesian Athletes at the Princess Sirivannavari Thailand Masters 2025	https://www.instagram.com/p/DFkpauohGTe/?img_index=1
27	February 9, 2025	Happy National Press Day	https://www.instagram.com/p/DF1TYDxB_uO/
28	February 10, 2025	Ready to Ignite the Champion's Energy	https://www.instagram.com/p/DF44LbGB4jK/?img_index=1
29	February 12, 2025	Digital Transformation Drives Savings Growth as BNI Records IDR21.5 trillion Profit in 2024	https://www.instagram.com/p/DF8_sLcTvpw/
30	February 12, 2025	Enhancing a Premium Lifestyle for Japanese Enthusiasts, BNI Wins Two Awards from JCB	https://www.instagram.com/p/DF-DOWIBARe/?img_index=1
31	February 13, 2025	Concluding the Chinese New Year Customer Gathering Series, BNI Encourages Customers to Earn More in 2025	https://www.instagram.com/p/DGA1c-4Bk2m/?img_index=1
32	February 13, 2025	BNI Jejak Kopi Khatulistiwa Supports Garut Coffee for Food Self-Sufficiency and Global Expansion	https://www.instagram.com/p/DGAomWGBpL8/
33	February 15, 2025	Preventing Stunting, BNI Provides Nutritious Meals and Smart Parenting Programs in Tasikmalaya	https://www.instagram.com/p/DGGDKLKhwHa/
34	February 15, 2025	With Support from BNI Xpora, Bananania Banana Chips Create Jobs and Enter Global Markets	https://www.instagram.com/p/DGGHouPhbKr/
35	February 15, 2025	BNI Wins Two Alpha Southeast Asia 2024 Awards for Trade Finance Solutions and Cross-Border Transactions	https://www.instagram.com/p/DGGLIBvB-Sh/
36	February 16, 2025	Thank You for Your Service, BNI Hi-Movers Volunteers of Bakti BUMN	https://www.instagram.com/p/DGICVJeBrZJ/?img_index=1
37	February 17, 2025	Congratulations to the Indonesian Badminton Team, Champions of the 2025 Badminton Asia Mixed Team Championship	https://www.instagram.com/p/DGKnbvyh3CL/

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38	February 20, 2025	BNI Listed Among TIME's 500 Best Companies in Asia Pacific	https://www.instagram.com/p/DGRoCx6h_Rb/
39	February 21, 2025	BNI's Commitment to Driving MSMEs Go Global, BNI Xpora Sends Kultiva Tempe Chips to China	https://www.instagram.com/p/DGUQyYHByZS/?img_index=1
40	February 21, 2025	Easier Financing Access for Debtors, BNI Disburses Supply Chain Financing to APP Group Partners	https://www.instagram.com/p/DGUY609hRhm/
41	February 21, 2025	BNI and ACC Establish Cooperation for Autopay Services	https://www.instagram.com/p/DGUeDKyhRI6/
42	February 23, 2025	Visiting a Financial Bazaar for BNI Hi-Movers: From Smart Investment Education to Attractive Promotions	https://www.instagram.com/p/DGas6DyhfT_/?img_index=1
43	February 23, 2025	Partnering with Halu Oleo University Kendari, BNI Strengthens Digital Services Through the Campus Financial Ecosystem Program	https://www.instagram.com/p/DGa0TE9BubQ/
44	February 24, 2025	Hosting a Communication Workshop, BNI Optimizes the Role of SOEs in Building Indonesia's Global Image	https://www.instagram.com/p/DGcUCoghcL3/?img_index=1
45	February 24, 2025	hibank Launches the hi by hibank App—One Click, Endless Potential for MSMEs	https://www.instagram.com/p/DGcaNMPhuEh/?img_index=1
46	February 24, 2025	Congratulations on the Inauguration of Danantara Indonesia	https://www.instagram.com/p/DGcc8SWBduE/?img_index=1
47	February 26, 2025	Welcome a Month of Abundant Blessings with Various BNI Promotions	https://www.instagram.com/p/DGh_twyBjhm/
48	February 27, 2025	Supporting the Expansion of Electric Vehicles in Indonesia, BNI Partners with Geely	https://www.instagram.com/p/DGkJABqBqU_/
49	February 28, 2025	Solid Fundamentals to Open 2025, BNI's Net Profit Grows 9.7% YoY in January 2025	https://www.instagram.com/p/DGnKSD4hN_B/?img_index=1
50	March 1, 2025	Marhaban Ya Ramadan	https://www.instagram.com/p/DGnfcP9hym-/
51	March 1, 2025	What's New This Ramadan? A Month of Abundant Blessings with BNI	https://www.instagram.com/p/DGnnT-RBCoN/?img_index=1
52	March 1, 2025	Ramadan 1446 Hijri e-Imsakiyah Accessible Anytime	https://www.instagram.com/p/DGnno18BmKd/?img_index=1
53	March 3, 2025	After 42 Years of Operation, BNI New York Relocates	https://www.instagram.com/p/DGuKnVwBjDR/?igsh=MXU2cGg5d2czdWE1dw==
54	March 4, 2025	BNI Partners with Three Supermarkets to Hold the 2025 Shopping Race	https://www.instagram.com/p/DGuRfMrBHnX/?igsh=MTZzZnoyNG5renQyaw==
55	March 4, 2025	A Blessed Ramadan with wondr by BNI	https://www.instagram.com/p/DGxilm7hzNJ/
56	March 4, 2025	A Blessed Ramadan with BNI	https://www.instagram.com/p/DGxm65qB0JS/
57	March 5, 2025	Driving Strategic Infrastructure Project Financing, BNI and SMI Enter into IDR550 billion Repo Cooperation	https://www.instagram.com/p/DG0PjVUhRXo/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
58	March 6, 2025	Ramadan Safari 1446 H, Regional 01	https://www.instagram.com/reel/DG15pTjzjan/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
59	March 6, 2025	BNI Announces Changes to Operating Hours to Ensure Smooth Banking Transactions During Ramadan	https://www.instagram.com/p/DG2DvoLBRAI/?utm_source=ig_web_copy_link
60	March 7, 2025	30 Years of Supporting Retirement Planning, BNI Pension Fund Wins Brand for Good Award	https://www.instagram.com/p/DG5Asx4BbCb/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
61	March 7, 2025	Ramadan Spiritual Session: Kurma Kuliah Rohani	https://www.instagram.com/p/DG5G_GtBiJb/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
62	March 7, 2025	The Only Bank in Indonesia to Receive the Bronze Asia's Best Sustainability Report Award	https://www.instagram.com/p/DG5e5GnBlap/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
63	March 8, 2025	Ramadan Safari 1446 H, Regional Office 03, Lampung (March 4, 2025)	https://www.instagram.com/reel/DG7KYWwy_Cf/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
64	March 8, 2025	Ramadan Safari 1446 H, Regional Office 07, Ambon (March 4, 2025)	https://www.instagram.com/reel/DG7d-FXhUOG/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==

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65	March 9, 2025	Ramadan Safari 1446 H, Regional Office 06, Surabaya (March 7, 2025)	https://www.instagram.com/reel/DG9n8iUibZl/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
66	March 10, 2025	Ramadan Safari 1446 H, Regional Office 16, Sorong (March 7, 2025)	https://www.instagram.com/reel/DHAL9Yyh84K/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
67	March 10, 2025	Ramadan Safari 1446 H, Regional Office 04, Bandung (March 7, 2025)	https://www.instagram.com/reel/DHAUAqQvWnl/?utm_source=ig_web_copy_li6868nk&igsh=MzRlODBiNWFlZA==
68	March 10, 2025	Welcoming Ramadan, BNI Provides New Banknote Exchange Outlets	https://www.instagram.com/p/DHAhFluhWMh/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
69	March 10, 2025	BNI Distributes Basic Necessities and Cleaning Supplies to Flood Victims in Bekasi	https://www.instagram.com/p/DHAnICYh6AX/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
70	March 10, 2025	BNI Becomes the First and Only Indonesian Bank to Receive a Financial Literacy Award from the Hong Kong Monetary Authority	https://www.instagram.com/p/DHAuaR7hv0D/?utm_source=ig_web_copy_link
71	March 11, 2025	Make Your Investments More Meaningful This Ramadan with wondr—Everything Made Easier	https://www.instagram.com/p/DHDUskGBuvS/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
72	March 12, 2025	Ramadan Safari 1446 H, Regional Office 02, Pekanbaru (March 11, 2025)	https://www.instagram.com/reel/DHF8YKZpLMk/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
73	March 12, 2025	Ramadan Safari 1446 H, Regional Office 08, Mataram (March 11, 2025)	https://www.instagram.com/reel/DHF8Prez8mi/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
74	March 12, 2025	Ramadan Safari 1446 H, Regional Office 09, Pontianak (March 11, 2025)	https://www.instagram.com/reel/DHGcpgcz4wN/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
75	March 14, 2025	BNI Prepares IDR21 trillion in Cash for the 2025 Eid Period, Ensuring Secure Banking Services During the Holidays	https://www.instagram.com/p/DHLWN8ahBws/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
76	March 14, 2025	BNI Launches the BNI Mitra10 Credit Card—Earn Rewards and Build Your Dream Home	https://www.instagram.com/p/DHLdJ66h6o0/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
77	March 14, 2025	BNI Partners with Duluin to Expand Financial Inclusion and Enhance Employee Well-Being	https://www.instagram.com/p/DHLdJ66h6o0/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
78	March 15, 2025	Ramadan Safari 1446 H, Regional Office 05, Semarang (Friday, March 14, 2025)	https://www.instagram.com/reel/DHN0abCyZ-Z/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
79	March 15, 2025	Ramadan Safari 1446 H, Regional Office 11, Gorontalo (March 14, 2025)	https://www.instagram.com/reel/DHOBmFfzTo4/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
80	March 16, 2025	Ramadan Safari 1446 H, Regional Office 17, Surakarta (March 14, 2025)	https://www.instagram.com/reel/DHQPXY5R3cO/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
81	March 16, 2025	Ramadan Safari 1446 H, Regional Office 18, Banyuwangi (March 14, 2025)	https://www.instagram.com/reel/DHQbhrBJDSr/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
82	March 17, 2025	Congratulations to Leo Rolly Carnando and Bagas Maulana, Men's Doubles Runners-Up at the All England 2025	https://www.instagram.com/p/DHSVwfXhuR8/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
83	March 18, 2025	Commitment to the Implementation of Good Corporate Governance	https://www.instagram.com/p/DHVXy5dBsha/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
84	March 20, 2025	Wondrful Ramadan 1446 H, Jakarta (March 19, 2025)	https://www.instagram.com/reel/DHbBaJvhAp1/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
85	March 21, 2025	BNI Launches Wealth Management Services in Singapore in Collaboration with Schroders and Fullerton	https://www.instagram.com/p/DHdl4JmBSWg/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
86	March 22, 2025	Join the Movement: Earth Hour—A Moment Without Light for a Sustainable Planet	https://www.instagram.com/p/DHf1y-UhX5D/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==

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87	March 23, 2025	Sobat Aksi Ramadan 2025: BNI Renovates Mosques and Provides Food Assistance	https://www.instagram.com/p/DHiYiCxBC4K/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
88	March 25, 2025	Best Wishes on Your New Appointment, Robertus Billitea	https://www.instagram.com/p/DHnTZs6hTzG/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
89	March 25, 2025	Best Wishes on Your New Appointment, Mucharom	https://www.instagram.com/p/DHnUXNOhY0Y/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
90	March 25, 2025	Best Wishes on Your New Appointment, Novita Widya Anggraini	https://www.instagram.com/p/DHnpNTXB3Cr/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
91	March 26, 2025	Thank You for Your Service and Dedication, Board of Directors	https://www.instagram.com/p/DHp1AdVhlmT/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
92	March 26, 2025	Thank You for Your Service and Dedication, Board of Commissioners	https://www.instagram.com/p/DHp2hQFhG7R/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
93	March 26, 2025	BNI Declares Total Dividends of IDR13.95 trillion, RUPST 2025 Approves IDR374 per Share	https://www.instagram.com/p/DHp53RXhEdW/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
94	March 27, 2025	Best Wishes on Your Appointment, Board of Directors of PT Bank Negara Indonesia (Persero)	https://www.instagram.com/p/DHsPF3mBJ9u/?img_index=1&igsh=MWM1bWZuN29nMzBvbw==
95	March 27, 2025	Best Wishes on Your Appointment, Board of Commissioners of PT Bank Negara Indonesia (Persero)	https://www.instagram.com/p/DHsPQwrhTI-/?igsh=cDBnZmNicWx2aHQ5
96	March 27, 2025	Best Wishes on Your Appointment to the Board of Directors and Board of Commissioners of BNI	https://www.instagram.com/p/DHsPbCjhcnX/?igsh=cmdlYnYyNHJ2cWZr
97	March 27, 2025	BNI Successfully Organizes Free Homecoming Program 2025, Deploying 121 Buses to Purwokerto and Padang	https://www.instagram.com/p/DHsqh1YBSG2/?igsh=MXNzdTAxeDdpZXV5dA==
98	March 28, 2025	Happy Nyepi Day, Saka 1947	https://www.instagram.com/reel/DHvvmnVBgFt/?igsh=MTJhMXJnZ256d3Njbw==
99	March 30, 2025	BNI Hi-Movers Care: Report Transaction Issues and Potential Locations—Rewards Await	https://www.instagram.com/p/DH0KLwbhSA5/?igsh=NTg1bjMyenBvOG85
100	March 30, 2025	Beware of Scams—What Should Be a Joyful Eid Could Turn Risky Due to Fake Links	https://www.instagram.com/p/DH0OWCNBccj/?igsh=MXRobTkyOXdoazNtdg==
101	March 31, 2025	Happy Eid al-Fitr 1446 Hijri	https://www.instagram.com/reel/DH11ZMWBgkd/?igsh=bHJubGZuMm85OW50
102	April 9, 2025	BNI Hosts Halal Bihalal Gathering, Strengthening Ties and Introducing the New Board of Commissioners and Directors	https://www.instagram.com/reel/DH11ZMWBgkd/?igsh=bHJubGZuMm85OW50
103	April 10, 2025	Binnova Batch 5 – 2025 Is Calling! BNI Hi-Movers, Submit Your Best Ideas	https://www.instagram.com/p/DIOy74ZhUxY/?igsh=M2IxOWU5ajNrZjdp
104	April 11, 2025	With Support from BNI Xpora, Indo Tropikal Ginger Candy Producer Penetrates Export Markets	https://www.instagram.com/p/DITVacUBLNO/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
105	April 13, 2025	The Board of Commissioners, Board of Directors, and All Employees of PT Bank Negara Indonesia (Persero) Tbk Extend Happy 27th Anniversary Greetings to the Ministry of State-Owned Enterprises	https://www.instagram.com/p/DIX9z3Rhfe-/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
106	April 16, 2025	Rejeki wondr BNI: Increase Your Balance and Transactions on wondr—Prizes Await	https://www.instagram.com/p/DIfjIATBBm8/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
107	April 16, 2025	BNI Java Jazz Festival, March 19–April 30, 2025: Time to Grab Buy 1 Get 2 Tickets on wondr	https://www.instagram.com/p/DIfrTtmhyfC/?utm_source=ig_web_copy_link
108	April 16, 2025	Rejeki wondr BNI Ready to Award Prizes from Chery J6 to Mercedes-Benz	https://www.instagram.com/p/DIgW3BtBxhZ/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==

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109	April 17, 2025	Commemorating Good Friday: The Crucifixion of Jesus Christ	https://www.instagram.com/p/DIkLqttBDZL/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
110	April 17, 2025	BNI Hi-Movers, Ready to Take on the Challenge for Total Prizes of IDR7.5 million?	https://www.instagram.com/p/DIkvFJehZT4/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
111	April 20, 2025	Happy Easter	https://www.instagram.com/p/DIpVQJOhGvT/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
112	April 21, 2025	Happy Kartini Day	https://www.instagram.com/p/DIr6D3nBU1E/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
113	April 22, 2025	Find and Complete the Puzzle—Exciting Prizes Await	https://www.instagram.com/p/DIsVg-IBWoy/?utm_source=ig_web_copy_link
114	April 22, 2025	Happy International Earth Day	https://www.instagram.com/p/DIue5-FhMI1/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
115	April 23, 2025	Happy Galungan Day, April 23, 2025	https://www.instagram.com/p/DIxqRLDB4a4/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
116	April 23, 2025	BNI Java Jazz Festival, May 30–June 1, 2025	https://www.instagram.com/reel/DIxqW_aB7EQ/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
117	April 26, 2025	Good Luck to Team Indonesia at the 2025 Sudirman Cup	https://www.instagram.com/p/DI5bL1fBIWp/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
118	April 28, 2025	BNI Director of Consumer Banking Wins Top Financial Woman Leaders 2025	https://www.instagram.com/p/DI8Y0QphjhX/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
119	April 28, 2025	BNI Holds Shopping Race in 14 Cities, Driving Transaction Digitalization and Strengthening Customer Experience	https://www.instagram.com/p/DI8ZE3sBBtB/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
120	April 28, 2025	Rejeki wondr BNI Prize Draw at the GIOI Wondrful Run Event, 500 Runners Enliven Sunday Morning CFD	https://www.instagram.com/p/DI8iVahBqDi/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
121	April 29, 2025	BNI Continues Solid Performance Growth, Loans and Savings Increase 10% in Q1 2025	https://www.instagram.com/p/DI-vr9YBtT-/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
122	April 29, 2025	BNI Partners with IKA ITS to Support the Advancement of Higher Education in Indonesia	https://www.instagram.com/p/DJBCgfrhvH7/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
123	April 29, 2025	BNI Wins Three Awards from The Digital Banker, Reaffirming the Strategic Role of BNIdirect	https://www.instagram.com/p/DJBgtuHhGh-/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
124	May 1, 2025	Happy International Workers' Day 2025	https://www.instagram.com/p/DJFqB1whTHT/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
125	May 1, 2025	Rejeki wondr BNI Comes to Banten, Offering Fun Activities and Attractive Prizes	https://www.instagram.com/p/DJGBneZhgIO/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
126	May 2, 2025	Happy National Education Day, May 2, 2025	https://www.instagram.com/p/DJIOzlchq6o/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
127	May 2, 2025	Congratulations! You Have Been Selected as the Winner of the Wholesale Crosswords Puzzle	https://www.instagram.com/p/DJI-58aBluU/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
128	May 3, 2025	Happy Kuningan Day	https://www.instagram.com/p/DJKzpcXBA_q/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
129	May 3, 2025	Winning Four Awards at the 2025 Mastercard Forum, BNI Reaffirms Its Position as a Transactional Bank	https://www.instagram.com/p/DJLve4shIWB/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==
130	May 4, 2025	Thank You, Team Indonesia, for Your Efforts at the 2025 Sudirman Cup	https://www.instagram.com/p/DJO0dUSBfKo/?utm_source=ig_web_copy_link&igsh=MzRIODBiNWFIZA==

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131	May 4, 2025	Rejeki wondr BNI – CFD Takeover: BNI Invites the Public to Stay Healthy While Competing for Attractive Prizes	https://www.instagram.com/p/DJO1PE7BP3g/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
132	May 10, 2025	BNI Targets Young Investors to Manage Investments Through the New BIONS	https://www.instagram.com/p/DJbqzcDhSUY/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
133	May 10, 2025	BNI Urges the Public to Beware of Scams Disguised as Rejeki wondr BNI Prize Draws	https://www.instagram.com/p/DJbtKlihLbv/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
134	May 10, 2025	BNI Supports the 2025 Futsal Series, Engaging More Than 16,000 Student Athletes Nationwide	https://www.instagram.com/p/DJbweInB3DH/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
135	May 10, 2025	Providing Affordable Mortgages for Migrant Workers Through Collaboration with the Ministry of Public Works and Housing, KP2MI, and BP Tapera	https://www.instagram.com/p/DJcFamZBnzR/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
136	May 12, 2025	Happy Vesak Day	https://www.instagram.com/reel/DJh-wEUBfjR/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
137	May 16, 2025	BNI Provides Solutions to Accelerate Supply Chain Financing Through BNIdirect Supply Chain	https://www.instagram.com/p/DJtrI-uh909/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
138	May 16, 2025	From Bekasi to Probolinggo, BNI Supports Infrastructure Improvements to Drive Rural Economic Growth	https://www.instagram.com/p/DJtyAb0hb7l/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
139	May 20, 2025	Happy National Awakening Day, May 20, 2025	https://www.instagram.com/p/DJ2llydh5vs/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
140	May 21, 2025	Rejeki wondr BNI Podcast Series	https://www.instagram.com/p/DJ6Yiv_x4P_/?igsh=N3Vpamdxa2lwbngx
141	May 21, 2025	Realizing Food Security and Rural Economic Equity, BNI Forms a Strategic Partnership with BUMDes in Yogyakarta	https://www.instagram.com/p/DJ6cTZPxgCf/?igsh=aXJ4aXQxNnFtbnps
142	May 21, 2025	BNI Partners with Ismaya Group to Present Japanese Cuisine	https://www.instagram.com/p/DJ6cTZPxgCf/?igsh=aXJ4aXQxNnFtbnps
143	May 21, 2025	Strengthening Transformation Commitment, BNI Wins CIO of the Year at the ASEAN Fintech Awards 2025	https://www.instagram.com/p/DJ6jlHhxzHL/?igsh=MWR6czRod243MGlsNg==
144	May 29, 2025	Prepare Yourself to Be the #1 JavaJazz Fan—BNI Java Jazz Starter Pack	https://www.instagram.com/p/DKMS_04SCBZ/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
145	May 29, 2025	Don't Get Lost at the Biggest Java Jazz Festival—BNI Java Jazz Venue Map	https://www.instagram.com/p/DKMohv0yDo2/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
145	May 29, 2025	BNI Presents a Wondrful Experience, Celebrating 20 Years of the Java Jazz Festival	https://www.instagram.com/p/DKM_icuSkSU/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
146	May 29, 2025	Commemorating the Ascension of Jesus Christ	https://www.instagram.com/p/DKNwQK1h5U-/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
147	May 31, 2025	BNI Java Jazz Festival Day 1 Recap	https://www.instagram.com/reel/DKTwlXbR1cN/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
148	June 1, 2025	Happy Pancasila Day, June 1, 2025	https://www.instagram.com/p/DKVeqdZSE2N/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
149	June 1, 2025	BNI Java Jazz Festival Day 2 Recap	https://www.instagram.com/reel/DKWSnE7xhuc/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
150	June 2, 2025	BNI Java Jazz Festival Day 3 Recap	https://www.instagram.com/reel/DKZPoUgRWL1/?igsh=aHVscGRuZWJmdWpn
151	June 5, 2025	Happy World Environment Day 2025	https://www.instagram.com/p/DKfx2lWykYw/?igsh=MWV3a25neDV4aXdxYg==
152	June 5, 2025	The Roar of Istora Will Bring a New Story	https://www.instagram.com/p/DKguSZuSbQR/?igsh=OWMzdjAycnNiOXo0

No	Date	Title	Publication Links
153	June 5, 2025	Supporting World Environment Day, BNI GoGreen Conducts Mangrove Conservation to Boost the Banyuwangi Community Economy	https://www.instagram.com/p/DKgzCydyUa_/?igsh=MXZnZDFkb2JmNHFqOA==
154	June 5, 2025	BNI Strengthens Its Environmental Commitment on World Environment Day 2025	https://www.instagram.com/p/DKg2c5Oy1Qi/?igsh=MWp3dXpsaGY0c2VvNg==
155	June 5, 2025	BNI Achieves Zero Waste to Landfill, Realizing an Environmentally Friendly Office	https://www.instagram.com/p/DKg589ayrFL/?igsh=NDJ2MG1jazk2b3E=
156	June 5, 2025	BNI Ensures Customer Financial Services Remain Comfortable Throughout the Eid al-Adha Holiday	https://www.instagram.com/p/DKg9UGuyhSe/?igsh=MzYzdDFteXBjamFr
157	June 6, 2025	Happy Eid al-Adha 1446 H	https://www.instagram.com/reel/DKiWrUcSE78/?igsh=MXMyenhsbGUzODV5OA==
158	June 7, 2025	Congratulations to Sabar Karyaman and M. Reza, Men's Doubles Runners-Up at the Indonesia Open 2025	https://www.instagram.com/p/DKpMSQsybtg/?igsh=MTBoemtibDdhbTVjbg==
159	June 11, 2025	BNI Listed Among the 20 Most Influential Companies in the National Economy	https://www.instagram.com/p/DKwvS7cyZF0/?igsh=MWI5OHBmaGdoYWdycQ==
160	June 12, 2025	Commemorating Entrepreneurship Day, BNI Supports MSMEs to Scale Up, Be Sustainable, and Go Global	https://www.instagram.com/p/DKwyz0ayPr7/?igsh=OXk2bW16MG9ya2sw
161	June 14, 2025	BNI's Tangible Contribution to the Infrastructure Sector, Supporting Connectivity and Economic Equity	https://www.instagram.com/p/DK2HC5mS-JX/?igsh=MTVmcmJwNWJsemxxag==
162	June 14, 2025	Strengthening Green and Social Financing, BNI Is Ready to Issue an IDR5 trillion Sustainability Bond	https://www.instagram.com/p/DK2KASeyeEk/?igsh=bWN1NGZxeGg4OTg5
163	June 14, 2025	Strengthening the Backbone of the National Economy, BNI Disburses IDR4.6 trillion in KUR to More Than 20,000 MSMEs	https://www.instagram.com/p/DK3Rl6wSXmF/?igsh=MW94dWxlbmhienU1bA==
164	June 14, 2025	Cash Deposits at BNI CRM Are Now More Rewarding, with Cashback and a Chance to Win a Mercedes-Benz	https://www.instagram.com/p/DK3YclryGZo/?igsh=cGJ6eXQ4dG93OGll
165	June 16, 2025	BNI Brings Three Indonesian MSMEs to South Korea's Largest Food Exhibition	https://www.instagram.com/p/DK9RhCcySkV/?igsh=Z2k3aDlteHJtbG1q
166	June 21, 2025	BNI Strengthens the Campus Digital Financial Ecosystem	https://www.instagram.com/p/DLJigANSyJE/?utm_source=ig_web_copy_link&igsh=YmRpZXJiNHhtZ3ox
167	June 22, 2025	Happy 498th Anniversary of Jakarta	https://www.instagram.com/p/DLLjTSUzXvv/?utm_source=ig_web_copy_link&igsh=MTY5OGM5b28wMWVyMw==
168	June 23, 2025	BNI Receives International Recognition as One of the Best Companies to Work for in Asia	https://www.instagram.com/p/DLPuz_2Syne/?utm_source=ig_web_copy_link&igsh=dnFxd2kzajY0cGF6
169	June 26, 2025	BNI Sweeps 16 Awards at the 2025 BSEA	https://www.instagram.com/p/DLW741kyhka/?utm_source=ig_web_copy_link&igsh=MTlweHducjlhczFlMA==
170	June 26, 2025	BNI Holds the BNIdirect Capabilities Event in Makassar	https://www.instagram.com/p/DLXAyHISSP7/?utm_source=ig_web_copy_link&igsh=MW9ndmtydmliNmR2Yw==
171	June 27, 2025	Happy Islamic New Year, 1 Muharram 1447 H	https://www.instagram.com/p/DLYbR0dSBmg/?utm_source=ig_web_copy_link&igsh=aXVpdG9mNXNiMHE5
172	June 28, 2025	Get Ready for July 5 & 6	https://www.instagram.com/p/DLmoK8Yyw8x/?utm_source=ig_web_copy_link&igsh=Y3o5a25oNHU4N21p
173	July 2, 2025	BNI Brings Home the Excellence GCG Award 2025	https://www.instagram.com/p/DLmkeYpSdFg/?utm_source=ig_web_copy_link&igsh=MWJ2bDk1c2NhNWs0Zg==
174	July 2, 2025	BNI Wins the Best Digital Banking Innovation Adoption 2025 Award	https://www.instagram.com/p/DLmmTWeSHC1/?utm_source=ig_web_copy_link&igsh=MXRrOHo2YTJ0bDd6Ng==
175	July 2, 2025	BNI Wins Two GovMedia Awards 2025	https://www.instagram.com/p/DLmoK8Yyw8x/?utm_source=ig_web_copy_link&igsh=Y3o5a25oNHU4N21p
176	July 2, 2025	BNI Hi-Movers, Let's Show the Excitement of BNI's 79th Anniversary	https://www.instagram.com/p/DLmtHADhU4g/?utm_source=ig_web_copy_link&igsh=dWo1YnNodDVsaDI5

No	Date	Title	Publication Links
177	July 2, 2025	Flash Sale—Only Valid for 2 Hours. Mark the Time	https://www.instagram.com/reel/DLmzDAuSfZh/?utm_source=ig_web_copy_link&igsh=eHdxaTF2cHB1bmJ4
178	July 2, 2025	A Collection of Attractive Promotions—Check Them Out	https://www.instagram.com/reel/DLm1vEhS1xa/?utm_source=ig_web_copy_link&igsh=OXo1cjl5OXMxdDg1
179	July 3, 2025	Use the Feature and Get the Promo—Find Out Here	https://www.instagram.com/reel/DLovE6iyPNw/?utm_source=ig_web_copy_link&igsh=ZzdjZnFoY2t4azdl
180	July 4, 2025	BNI's 79th Anniversary Is Just Around the Corner	https://www.instagram.com/p/DLq4Z7EhL0c/?utm_source=ig_web_copy_link&igsh=cWY0dmg2Nmw3bGtl
181	July 5, 2025	79th BNI, Accompanying Every Step	https://www.instagram.com/p/DLtjot6h4su/?utm_source=ig_web_copy_link&igsh=MTJoZDQ4aWwxOWt4bw==
182	July 5, 2025	Who Says the Beginning of the Month Means Cutting Back on Spending?	https://www.instagram.com/p/DLtn057STY3/?utm_source=ig_web_copy_link&igsh=d2xqcGZzbXN1aXFz
183	July 6, 2025	BNI Employee Excellence (BEE) Award 2025	https://www.instagram.com/p/DLw3BrEhbzC/?utm_source=ig_web_copy_link&igsh=MW9vdDZxajRibWQ0cA==
184	July 6, 2025	For 79 Years, BNI Has Not Only Been Present as a Financial Institution	https://www.instagram.com/p/DLxMQUNSwBQ/?utm_source=ig_web_copy_link&igsh=YmczcjhjemdhMGlkk
185	July 7, 2025	Thanksgiving Ceremony for BNI's 79th Anniversary	https://www.instagram.com/p/DLzstWAhjQZ/?igsh=MWFnOWNtcjB3ODk0NQ==
186	July 7, 2025	Swadharma Bakti Negara	https://www.instagram.com/reel/DLz53RdxJkn/?utm_source=ig_web_copy_link&igsh=OHV5bnN6ZHo3YjZk
187	July 7, 2025	BNI Board of Directors Visit Branch Offices	https://www.instagram.com/p/DL17g-rx5eC/?utm_source=ig_web_copy_link&igsh=MTdueWN0cG16OTN6Ng==
188	July 8, 2025	Ready to Go Global	https://www.instagram.com/reel/DL7CnXwSG2J/?utm_source=ig_web_copy_link&igsh=M3YxNW8wcmMxeTkz
189	July 10, 2025	BNI Is Ready to Support MSMEs Going Public Through the RISE to IPO Program	https://www.instagram.com/p/DMMoahoSNA0/?utm_source=ig_web_copy_link&igsh=MWNmcjNwbnIla3hicg==
190	July 17, 2025	The Most Recommended Bank with a Creative Mortgage Program	https://www.instagram.com/p/DMMuoQxSV3g/?utm_source=ig_web_copy_link&igsh=dHhoZGZ5N3lucm81
191	July 17, 2025	Grave Visitation and Flower-Laying Ceremony Commemorating BNI's 79th Anniversary	https://www.instagram.com/p/DMNAjPxhzs4/?utm_source=ig_web_copy_link&igsh=MWprZ3ZvM3MwOXh5OQ==
192	July 17, 2025	Tribute to the Pioneer R.M. Margono Djojohadikoesoemo	https://www.instagram.com/p/DMWiiN_h-dZ/?utm_source=ig_web_copy_link&igsh=aXUzdHJ4ZTRmbjJ1
193	July 21, 2025	BNI Supports the Red-and-White Village/Urban Cooperative Program	https://www.instagram.com/p/DMaIX90yGJt/?utm_source=ig_web_copy_link&igsh=enhzcDN0bm5xNnpw
194	July 22, 2025	Happy National Children's Day 2025	https://www.instagram.com/p/DMbu2yASr5E/?utm_source=ig_web_copy_link&igsh=MWFvbDhudmQ5YXBncw==
195	July 23, 2025	BNI wondrX 2025: More Than Just an Expo	https://www.instagram.com/reel/DMb2rjwScHk/?utm_source=ig_web_copy_link&igsh=MmNsMmpnYTh4ZnB0
196	July 23, 2025	BNI Disburses 25,000 FLPP Mortgage Units	https://www.instagram.com/p/DMe1s9SSgYG/?utm_source=ig_web_copy_link&igsh=MTh6endjajR0ZHcwcQ==
197	July 24, 2025	Get to Know BNI wondrX 2025: More Than Just an Expo	https://www.instagram.com/p/DMe1s9SSgYG/?utm_source=ig_web_copy_link&igsh=MTh6endjajR0ZHcwcQ==

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198	July 24, 2025	BNI Wins the BRAVO 500 Summit Awards 2025	https://www.instagram.com/p/DMfXq4dSpJ3/?utm_source=ig_web_copy_link&igsh=MTd3OWVuMzRieWFiaw==
199	July 24, 2025	BNI Products and Services Win the Top Brand Award 2025	https://www.instagram.com/p/DMhm5u9S1Jm/?utm_source=ig_web_copy_link&igsh=azZsdndvNzh3MDBx
200	July 25, 2025	Strengthening Liquidity and Asset Quality Management	https://www.instagram.com/p/DMhyG7WS3wo/?utm_source=ig_web_copy_link&igsh=MWdhNHo0eWx1NmNleg==
201	July 25, 2025	Happy World Mangrove Day	https://www.instagram.com/p/DMjcOVCBRxu/?utm_source=ig_web_copy_link&igsh=Nmp3b3BmcjZmZnZz
202	July 26, 2025	Congratulations on the Achievements of Indonesian Badminton Athletes	https://www.instagram.com/p/DMm-_ypSXms/?utm_source=ig_web_copy_link&igsh=MjM1c2V0Y2prMnYw
203	July 27, 2025	The Excitement of BNI's 79th Anniversary Series	https://www.instagram.com/reel/DMr44PwhGUe/?utm_source=ig_web_copy_link&igsh=MTV1YTk0NnYwejZmbw==
204	July 29, 2025	Holding a Blood Donation Drive, BNI Demonstrates Care for Others	https://www.instagram.com/p/DMw-8bchI23/?utm_source=ig_web_copy_link&igsh=MWZvcWE2MjBocDFtcA==
205	August 1, 2025	Still in the Spirit of BNI's 79th Anniversary	https://www.instagram.com/reel/DMzHFi6yka7/?utm_source=ig_web_copy_link&igsh=MTBxeWY0ZnV6MmhsOQ==
206	August 6, 2025	BNI Hi-Movers, Let's Join the Poetry Reading Competition	https://www.instagram.com/p/DNA5K3FhCUk/?utm_source=ig_web_copy_link&igsh=MWV2MGM4MHhubmFqeA==
207	August 7, 2025	Planting 79,000 Coastal Pine Seedlings	https://www.instagram.com/p/DNCntSLhesc/?utm_source=ig_web_copy_link&igsh=MWRhNmtuM2pkMG9mNw==
208	August 7, 2025	BNI and SMF Integrate Digital Payment Services	https://www.instagram.com/p/DNDDBL5yPns/?utm_source=ig_web_copy_link&igsh=MWtwMWxqMXgwdmVzMA==
209	August 8, 2025	More Than Just an Expo	https://www.instagram.com/p/DNFP1tnSbDz/?utm_source=ig_web_copy_link&igsh=MWRpczkwNDlrYXowNw==
210	August 9, 2025	Planting 79,000 Coastal Pine Trees at Tiris Beach, Indramayu	https://www.instagram.com/p/DNIbEc7Bc32/?utm_source=ig_web_copy_link&igsh=YzNIdHhpbGphOGps
211	August 12, 2025	Happy Independence Day of the Republic of Indonesia	https://www.instagram.com/reel/DNQVx95yYSd/?utm_source=ig_web_copy_link&igsh=MWZ2enM1Zmd4c25hOA==
212	August 14, 2025	Let's Show the Excitement of Indonesia's 80th Independence Anniversary	https://www.instagram.com/p/DNUWGicyQuE/?utm_source=ig_web_copy_link&igsh=MXJlcXFkazRhaTFyaA==
213	August 14, 2025	Congratulations to the Winners of Rejeki wondr BNI	https://www.instagram.com/p/DNUXxOjyDe9/?utm_source=ig_web_copy_link&igsh=ZWxwbGRidWp1M2Nn
214	August 15, 2025	Let's Experience the Excitement of BNI wondrX 2025	https://www.instagram.com/p/DNXS1dRhAc5/?utm_source=ig_web_copy_link&igsh=NmVnZXA0bThrMWlo
215	August 16, 2025	Show Your Creativity at the BNIdirect Video Competition 2025	https://www.instagram.com/p/DNYDpq5xZNe/?utm_source=ig_web_copy_link&igsh=eWpkNjRrbTV4bGpw
216	August 16, 2025	BNI WONDRX 2025 Officially Opens	https://www.instagram.com/p/DNZdVB2Be1E/?utm_source=ig_web_copy_link&igsh=enRxZzNydXJ5MDhp
217	August 16, 2025	Thank You for Your Service! BNI Hi-Movers Volunteers of Bakti BUMN	https://www.instagram.com/p/DNZoHhxy9aC/?utm_source=ig_web_copy_link&igsh=YzQwYnplb3ZlZG45
218	August 16, 2025	Happy Independence Day of the Republic of Indonesia	https://www.instagram.com/reel/DNb9jadBvOS/?utm_source=ig_web_copy_link&igsh=enpzYXg5dGd1bHZz

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219	August 17, 2025	Day 2 of BNI wondrX 2025	https://www.instagram.com/p/DNcg83phk7e/?utm_source=ig_web_copy_link&igsh=MTB6N3FmdG5vaDExdw==
220	August 18, 2025	Watching the Carnival While Taking Selfies—This Year's Independence Day Celebration Is So Much Fun	https://www.instagram.com/p/DNc619WSGhR/?utm_source=ig_web_copy_link&igsh=MTF0M3NtNDd2cXh4dw==
221	August 18, 2025	Commemoration of the 80th Anniversary of the Republic of Indonesia	https://www.instagram.com/p/DNdP6XzBSfo/?utm_source=ig_web_copy_link&igsh=MTFmeGRuZXlwdWlpag==
222	August 18, 2025	Even More Festive on the Final Day of BNI WONDRX 2025	https://www.instagram.com/p/DNfCWfehu_l/?utm_source=ig_web_copy_link&igsh=Y2h2a2h4ZGF6eG53
223	August 18, 2025	BNI Presents WONDRSTAGE at Dukuh Atas	https://www.instagram.com/p/DNf0lGdhMTC/?utm_source=ig_web_copy_link&igsh=MWdqMWFqc2RvdjZjMA==
224	August 19, 2025	People's Festival for the 80th Independence Anniversary	https://www.instagram.com/reel/DNkE2LbS8Xg/?utm_source=ig_web_copy_link&igsh=NHh3dmgzbWFyeXVh
225	August 20, 2025	BNI and ITB Hold a Community Run	https://www.instagram.com/p/DNvKt6nwiJq/?utm_source=ig_web_copy_link&igsh=d3B4NjJiaTExNTJm
226	August 24, 2025	BNI Wins Two Awards from OJK	https://www.instagram.com/p/DN5ieSUAZBS/?utm_source=ig_web_copy_link&igsh=Zjd3NnE4MG5hc3d6
227	August 28, 2025	BNI Disburses IDR5 trillion in Facilities to Jamkrindo	https://www.instagram.com/p/DN8JQXgAQ-Z/?utm_source=ig_web_copy_link&igsh=ZGlmcWVzdjF6dm82
228	September 2, 2025	Let's Use Social Media Wisely	https://www.instagram.com/p/DOF5jRHgc6y/?utm_source=ig_web_copy_link&igsh=MXI0ZHB4cHM3ajNyaA==
229	September 3, 2025	Celebrating National Customer Day 2025	https://www.instagram.com/p/DOlzmZ7AcJT/?utm_source=ig_web_copy_link&igsh=aThubWJ3NWo3eG04
230	September 3, 2025	BNI's Commitment to Reducing Stunting	https://www.instagram.com/p/DOJFyrPASIA/?utm_source=ig_web_copy_link&igsh=N2RhYWFjbWY3OW4=
231	September 4, 2025	Happy National Customer Day	https://www.instagram.com/p/DOKGKIYgXol/?utm_source=ig_web_copy_link&igsh=MTRmZXlncWlrdHB5Ng==
232	September 4, 2025	Happy National Customer Day 2025	https://www.instagram.com/reel/DOKa69bgcod/?utm_source=ig_web_copy_link&igsh=bmtjcjl1b2FnbDFz
233	September 4, 2025	Happy National Customer Day 2025	https://www.instagram.com/reel/DOKbYz6gbfX/?utm_source=ig_web_copy_link&igsh=MWV1c2hiOWJmcWM4dA==
234	September 5, 2025	Commemorating the Birth of Prophet Muhammad (Maulid Nabi Muhammad SAW)	https://www.instagram.com/p/DOMrAPygfeN/?utm_source=ig_web_copy_link&igsh=ajVhZ2xrcHl3cTRj
235	September 5, 2025	Management Outreach on National Customer Day 2025	https://www.instagram.com/p/DONF8fGEUOx/?utm_source=ig_web_copy_link&igsh=MWpkanZreWxwb2o0ZA==
236	September 5, 2025	From Western to Eastern Indonesia, BNI Branch Offices Join the Celebration of National Customer Day 2025	https://www.instagram.com/p/DONGQv4ETMv/?utm_source=ig_web_copy_link&igsh=MTk3aG9yMTFxa3AzOQ==
237	September 6, 2025	Behind the Scenes of Excellent BNI	https://www.instagram.com/p/DOORMqtEau_/?utm_source=ig_web_copy_link&igsh=ZDU1eXg4eTdiam01
238	September 7, 2025	Public Expose Live 2025	https://www.instagram.com/p/DOS3V_FAdqY/?utm_source=ig_web_copy_link&igsh=MTE0aXozM2cybHhzZg==
239	September 9, 2025	Happy National Sports Day	https://www.instagram.com/p/DOXlq8igYZF/?utm_source=ig_web_copy_link&igsh=MWE5YWhpY2NoMjI0Nw==
240	September 13, 2025	Furniture MSMEs from Klaten Penetrate Export Markets with Support from BNI Xpora	https://www.instagram.com/p/DOhfCcegWFr/?utm_source=ig_web_copy_link&igsh=MjluczF0a2l5bGYw

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241	September 15, 2025	BNI Moves Quickly to Disburse Emergency Aid	https://www.instagram.com/p/DOnv0huAbfa/?utm_source=ig_web_copy_link&igsh=MThjZzRhZDhydmJicQ==
242	September 18, 2025	BNI Drives Sustainability and the People's Economy	https://www.instagram.com/p/DOvsMZegVxN/?utm_source=ig_web_copy_link&igsh=Ynl0aXV6MzFxbno3
243	September 19, 2025	BNI Strengthens Integrity and GCG	https://www.instagram.com/p/DOxrCy5Abvk/?utm_source=ig_web_copy_link&igsh=MXhlcDdsY3lxMTJubg==
244	September 25, 2025	BNI Achieves the Highest Rating in GCG Implementation	https://www.instagram.com/p/DPBoqNIgW-P/?utm_source=ig_web_copy_link&igsh=aHdpNHdjYWszM3F1
245	September 26, 2025	BNI Strengthens Its ESG Commitment	https://www.instagram.com/p/DPDEstkgfoF/?utm_source=ig_web_copy_link&igsh=MTU1YnZsbnFtcjRsMg==
246	September 28, 2025	Happy International Right to Know Day	https://www.instagram.com/p/DPH5PRWAaax/?utm_source=ig_web_copy_link&igsh=MjY4aXB3cTYxMm15
247	September 28, 2025	BNI Socializes the Housing Credit Program in Banten	https://www.instagram.com/p/DPlacXWgVri/?utm_source=ig_web_copy_link&igsh=MWgwZWVvZ2hncGQyNg==
248	September 28, 2025	Congratulations on the Achievements of Indonesian Badminton Athletes	https://www.instagram.com/p/DPJDd3ggYTj/?utm_source=ig_web_copy_link&igsh=MTkwYzQxZjgwNzZmaQ==
249	September 29, 2025	BNI Encourages a Culture of Transparency	https://www.instagram.com/p/DPLpmHzgbD2/?utm_source=ig_web_copy_link&igsh=MWNoaDVjbm1ndjRiYQ==
250	September 30, 2025	BNIdirect Video Competition 2025	https://www.instagram.com/p/DPNsSq_Ac__/?utm_source=ig_web_copy_link&igsh=MTlsMjF4c293ZnkwZg==
251	October 5, 2025	BNI Strengthens the People's Economy and Environmental Sustainability in Ponggok Village	https://www.instagram.com/p/DPlO8cmAcrM/?utm_source=ig_web_copy_link&igsh=bW85Znk2bzQ5amY4
252	October 10, 2025	Board of Commissioners, Board of Directors, and All Employees of PT Bank Negara Indonesia (Persero) Tbk	https://www.instagram.com/p/DPlO8cmAcrM/?utm_source=ig_web_copy_link&igsh=bW85Znk2bzQ5amY4
253	October 11, 2025	BNI Encourages MSMEs to Scale Up	https://www.instagram.com/p/DPoIcl8ARoh/?utm_source=ig_web_copy_link&igsh=MXJxMzAzYmsyYjU0Mw==
254	October 12, 2025	Congratulations to the Indonesian Badminton Team, Men's Team Runners-Up	https://www.instagram.com/p/DPqsc5cAf_E/?utm_source=ig_web_copy_link&igsh=MXNncXZpOWl0cjNmNg==
255	October 13, 2025	BNI Dominates the 2025 Financial Services Basketball League	https://www.instagram.com/p/DPvo7LsgVGB/?utm_source=ig_web_copy_link&igsh=MTNsdnppZG5pamE0cg==
256	October 17, 2025	Happy 74th Birthday to the President of the Republic of Indonesia	https://www.instagram.com/p/DP6v98zgd5b/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
257	October 17, 2025	BNI Wins the IDX Channel Anugerah Inovasi Indonesia 2025	https://www.instagram.com/p/DP5CGe_AYOw/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
258	October 17, 2025	From Indonesia to the World: Time to Take the Global Stage at the Denmark Open	https://www.instagram.com/p/DP51s7cAZM5/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
259	October 17, 2025	BNI Supports the Development and Operation of a 500 MW Geothermal Energy Project with PT Geo Dipa Energi (Persero)	https://www.instagram.com/p/DP6E7xTgd2V/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
260	October 20, 2025	Proud! Indonesian Badminton Athletes Prove World-Class Achievements	https://www.instagram.com/p/DQA507VgXub/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
261	October 24, 2025	BNI Records Solid Fundamental Performance in Q3 2025	https://www.instagram.com/p/DQLafwhgbCs/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==

No	Date	Title	Publication Links
262	October 24, 2025	The wondr Jakarta Running Festival 2025 Is Just Around the Corner	https://www.instagram.com/p/DQMMNpfAVhm/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
263	October 25, 2025	Let's Go to the wondr Jakarta Running Festival Expo	https://www.instagram.com/p/DQNkHZpgcPj/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
264	October 26, 2025	BNI Invites 27,300 Runners to Drive the Economy and Protect the Earth	https://www.instagram.com/p/DQRl7KGge9-/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
265	October 26, 2025	Congratulations to Fajar Alfian & M. Shohibul Fikri, Men's Doubles Runners-Up at the Yonex French Open 2025	https://www.instagram.com/p/DQRyqp7gaX3/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
266	October 28, 2025	Happy Youth Pledge Day, October 28, 2025	https://www.instagram.com/p/DQVJI8DAbXv/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
267	November 1, 2025	From Pekanbaru to Medan, BNI and PBSI Bring the Spirit of Champions to Indonesia	https://www.instagram.com/p/DQeAX6jAeUv/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
268	November 2, 2025	BNI Supports the Expansion of Indonesian Diaspora Restaurants in the Netherlands Through the Diaspora Loan Program	https://www.instagram.com/p/DQiQx__AQ3I/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
269	November 3, 2025	Congratulations to the Winners of the BNIdirect Video Competition 2025	https://www.instagram.com/p/DQlZcqUgYEp/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
270	November 4, 2025	BNI–ITS Synergy Through the wondr Surabaya ITS Run 2025	https://www.instagram.com/p/DQnuA5wgeL0/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
271	November 6, 2025	Putri Kusuma Wardani	https://www.instagram.com/p/DQrNnSjgRYp/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
272	November 6, 2025	BNI Demonstrates the Role of Collaboration in Driving Digital Innovation	https://www.instagram.com/p/DQs6_T1gc_O/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
273	November 8, 2025	Supporting the Creativity of Local Filmmakers	https://www.instagram.com/p/DQwOzdAgU9H/?img_index=1
274	November 9, 2025	BNI Wins an Award for Its Contribution to MSME Empowerment and Village Finance	https://www.instagram.com/p/DQyGImkgReU/?img_index=1
275	November 10, 2025	Happy National Heroes Day	https://www.instagram.com/p/DQ2nY5qAV5c/
276	November 11, 2025	Indonesia International Challenge	https://www.instagram.com/p/DQ6f8pLgXO_/?img_index=1
277	November 12, 2025	BNI Encourages MSMEs to Scale Up	https://www.instagram.com/p/DRMc44TgWKl/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
278	November 18, 2025	Public Information Disclosure Public Test 2025	https://www.instagram.com/p/DRNyjibgZYv/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
279	November 19, 2025	Happy Galungan Day	https://www.instagram.com/p/DRQr_q-gbMa/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
280	November 20, 2025	BNI Wins the Women in SDGs Action Award 2025	https://www.instagram.com/p/DRQr_q-gbMa/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
281	November 20, 2025	BNI Wins Two Awards at ICXA 2025	https://www.instagram.com/p/DRReHPfAe_U/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
282	November 21, 2025	BNI Launches Indonesia's First ESG Advisory Playbook	https://www.instagram.com/quickpose/p/DRWSDEVAT9s/
283	November 22, 2025	wondr Bright Up Cup 2025	https://www.instagram.com/quickpose/p/DRV1o6WAa3S/
284	November 23, 2025	BNI Conducts a Public Test Presentation	https://www.instagram.com/quickpose/p/DRZa-tLAQS3/
285	November 24, 2025	Indonesian Young Athletes Reap Titles	https://www.instagram.com/quickpose/p/DRa1HArAbDp/

No	Date	Title	Publication Links
286	November 26, 2025	wondr Bright Up Cup Jakarta 2025—Buy 1 Get 2 Tickets	https://www.instagram.com/p/DReBKJPgf2l/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
287	November 27, 2025	Ready to Bright Up the Court?	https://www.instagram.com/p/DRhFfn3AdbY/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
288	November 29, 2025	Happy Kuningan Day	https://www.instagram.com/p/DRnif9oE4ct/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
289	November 29, 2025	Indonesia Dominates the Podium	https://www.instagram.com/p/DRn5dgFgY7E/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
290	November 30, 2025	Support and Empathy for Aceh Province, North Sumatra, and West Sumatra	https://www.instagram.com/p/DRoEnAigSog/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
291	December 1, 2025	BNI and the Ministry of Manpower Strengthen the Development of Young Talent	https://www.instagram.com/p/DRs52OAAfSQ/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
292	December 1, 2025	BNI Earns the "The Most Trusted Companies" Title	https://www.instagram.com/p/DRtArUvAX34/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
293	December 4, 2025	wondr Bright Up Cup Jakarta 2025 Giveaway	https://www.instagram.com/p/DRytS5XAby6/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
294	December 4, 2025	Use Social Media Wisely	https://www.instagram.com/p/DRy0RvygRN_/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
295	December 6, 2025	BNI Acts Swiftly to Support Sumatra's Recovery After Disasters	https://www.instagram.com/p/DR37zyXAcjp/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
299	December 6, 2025	BNI Is Present to Support Employees Affected by Disasters	https://www.instagram.com/p/DR39blzAY-E/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
300	December 6, 2025	International Anti-Corruption Day 2025	https://www.instagram.com/p/DR5x4JjgbHA/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
301	December 9, 2025	Commemorating International Anti-Corruption Day	https://www.instagram.com/p/DSBu2m1AZ9V/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
302	December 9, 2025	"Timur" Premieres, BNI Strengthens Its Support for the National Film Industry	https://www.instagram.com/p/DSB67m6AYII/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
303	December 9, 2025	wondr Bright Up Cup Jakarta 2025, New Energy for Indonesian Sports	https://www.instagram.com/p/DSB7pkrgRPz/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
304	December 14, 2025	BNI Wins the Environment & Sustainability Award at the ESG Achievement Awards 2025	https://www.instagram.com/p/DSORusmk0D5/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
305	December 14, 2025	BI Appreciates BNI's Contribution	https://www.instagram.com/p/DSMEUmQgZiX/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
306	December 14, 2025	BNI Wins the Digital Transformation Driver Award 2025	https://www.instagram.com/p/DSMH99Xgb6G/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
307	December 14, 2025	BNI Wins Two Prestigious Awards at the BI Awards 2025	https://www.instagram.com/p/DSMMKtYAXp9/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
308	December 14, 2025	BNI Demonstrates Governance Consistency, Sweeping Two Annual Report Awards 2024	https://www.instagram.com/p/DSNK616gZZC/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
309	December 14, 2025	Driving Gorontalo MSMEs to Penetrate Global Markets	https://www.instagram.com/p/DSORusmk0D5/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==

No	Date	Title	Publication Links
310	December 15, 2025	BNI Expands Emergency Aid Distribution for Communities Affected by Floods and Landslides Across Sumatra	https://www.instagram.com/reel/DSOmVF1gWn1/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
311	December 15, 2025	BNI Holds an Extraordinary General Meeting of Shareholders	https://www.instagram.com/p/DSSQhDuAaId/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
312	December 15, 2025	Thank You for Your Service and Dedication, Mr. Suminto	https://www.instagram.com/p/DSSVmarATT6/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
313	December 15, 2025	Congratulations on Your Appointment, Mr. Febrio Nathan Kacaribu	https://www.instagram.com/p/DSSawG8gaHB/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
314	December 15, 2025	#ServingWholeheartedly	https://www.instagram.com/reel/DSRUYbPAQrg/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
315	December 16, 2025	BNI Supports the Film "Timur"	https://www.instagram.com/p/DSU2m4_gQg4/?utm_source=ig_web_copy_link
316	December 16, 2025	BNI Supports Sean Gelael as He Begins the 2026 Racing Season	https://www.instagram.com/p/DSU6bdkAVnT/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
317	December 16, 2025	BNI Receives Appreciation from the Ministry of MSMEs	https://www.instagram.com/p/DSVBCLDAb-v/?utm_source=ig_web_copy_link
318	December 16, 2025	BNI Drives the Digitalization and Transparency of FMCG Supply Chains	https://www.instagram.com/p/DSbQJPDAeV4/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
319	December 19, 2025	Volunteers for Solidarity	https://www.instagram.com/p/DScrItmAUhy/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
320	December 20, 2025	In Sumatra, We Witnessed How Days That Had Been Interrupted Began Again	https://www.instagram.com/reel/DSfBb48ATmA/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
321	December 20, 2025	BNI's Commitment to Disaster Response in Sumatra	https://www.instagram.com/p/DSgnrFogcFJ/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
322	December 21, 2025	Happy National Mother's Day	https://www.instagram.com/p/DSiznKPEyJm/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
324	December 22, 2025	Commitment to the Implementation of Good Corporate Governance	https://www.instagram.com/p/DSjPCrGgS6S/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
325	December 22, 2025	BNI–BUMN Peduli Post Is Present to Strengthen Hope	https://www.instagram.com/p/DSm1P9-AbTC/?utm_source=ig_web_copy_link
326	December 25, 2025	Celebrate Your Moment, Make Your Wishes Come True with Exciting Promotions	https://www.instagram.com/reel/DSojxX1Aacn/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
327	December 25, 2025	BNI Continues to Serve Wholeheartedly Throughout the Year-End Holidays	https://www.instagram.com/p/DSpF40lgchg/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
328	December 25, 2025	BNI Provides Post-Disaster Trauma Healing	https://www.instagram.com/p/DSpd-lCgfLf/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
329	December 25, 2025	Merry Christmas	https://www.instagram.com/p/DSqfOuck_BA/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
330	December 29, 2025	BNI Once Again Becomes an Informative Public Institution	https://www.instagram.com/p/DS1KeFdgRai/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
331	December 29, 2025	BNI Srikandi: Strengthening the Role of Women for BNI's Future	https://www.instagram.com/p/DS1TV4agW4z/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==
332	December 29, 2025	BNI Strengthens Its Role in the Housing Program	https://www.instagram.com/p/DS1aGb-AeXX/?utm_source=ig_web_copy_link&igsh=MzRlODBiNWFlZA==

INTERNAL COMMUNICATION MEDIA

The use of technology in internal communication is crucial to support the effectiveness of information delivery at BNI. Therefore, BNI utilizes various internal communication tools, such as WhatsApp, email, and BNI Menyapa SMS, to disseminate information to all employees. These communication tools cover several types of information, including:

1. Newsletter, which contains bank-wide corporate information and high-level content conveyed by the Board of Directors;
2. Corporate Info, which includes more technical, bank-wide corporate information conveyed by the Corporate Secretary (CSE) Division;
3. Human Capital Information, which is technical and needs to be delivered promptly by the Human Capital Strategy (HCS) and Human Capital Services (HCE) Divisions; and
4. Other Information, which is bank-wide but not related to marketing, products, or services.

Throughout 2025, BNI Menyapa e-mails were recorded at 267. Below is a list of topics covered in the BNI Menyapa e-mail:

No	Date	Subject E-mail
1	January 3, 2025	BNI Menyapa – Royke Tumilaar Establishes an Innovation Hub at Sarinah, the Birthplace of wondr by BNI
2	January 3, 2025	BNI Menyapa – RACE Talk Series: "Next-Level Integrated Credit Tool in Wholesale Banking"
3	January 6, 2025	BNI Menyapa – Celebrating 37 Years, Indonesian Restaurant in Hong Kong Renovates through BNI Diaspora Loan
4	January 6, 2025	BNI Menyapa – Closing 2024, BNI Strengthens Consumer and Corporate Businesses to Support Economic Growth
5	January 13, 2025	BNI Menyapa – 2025: Creating for Indonesia, Stepping Forward for the World, Strengthening BNI's Role as a Symbol of National Pride on the Global Stage
6	January 14, 2025	BNI Menyapa – Palembang Entrepreneur Expands Culinary Business in Seoul Using BNI Diaspora Loan
7	January 15, 2025	BNI Menyapa – BNI Supports KUR Distribution for Indonesian Migrant Workers
8	January 15, 2025	BNI Menyapa – Announcement on the Transition from JIBOR to IndONIA
9	January 16, 2025	BNI Menyapa – Javanese Couple Succeeds in Culinary Business in Perth, Australia through BNI Diaspora Loan
10	January 20, 2025	BNI Menyapa – Every Purchase Feels Lighter with Low-Interest Installments Using BNI Credit Cards
11	January 21, 2025	BNI Menyapa – Supporting President Prabowo's Asta Cita in Human Capital Development, BNI Nurtures Young Indonesian Badminton Athletes
12	January 22, 2025	BNI Menyapa – Digital Transformation Drives Savings Growth, BNI Records IDR21.5 Trillion Profit in 2024
13	January 23, 2025	BNI Menyapa – Supporting President Prabowo's Asta Cita, BNI Strengthens Corporate Governance and Anti-Corruption Efforts
14	January 24, 2025	BNI Menyapa – BNI BUMI Program Supports President Prabowo's Asta Cita to Enhance the Green Economy
15	January 30, 2025	BNI Menyapa – BNI Wins Award as the Best Operational Bank for State Treasury Management
16	January 31, 2025	BNI Menyapa – Employee Savings at BNI Increase by 12.9%, Supporting Low-Cost Fund Achievement in 2024
17	February 3, 2025	BNI Menyapa – The Nation's Future Lies in the Hands of the Young Generation, BNI Actively Develops Indonesia's Golden Generation
18	February 4, 2025	BNI Menyapa – IDR21.5 Trillion Profit in 2024, BNI's Outstanding Performance Praised by the House of Representatives
19	February 5, 2025	BNI Menyapa – Every Purchase Feels Lighter with Low-Interest Installments Using BNI Credit Cards
20	February 5, 2025	BNI Menyapa – WDC Newsletter December Wrap-Up – Volume 11, January Issue
21	February 6, 2025	BNI Menyapa – BNI Invites Customers and Business Partners to Achieve Unlimited Prosperity in the Year of the Wood Snake
22	February 10, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Building an Anti-Corruption Culture within Business Partnership Networks
23	February 11, 2025	BNI Menyapa – BNI Encourages Equitable Rural Economic Growth through the BNI Dedikasi Program
24	February 11, 2025	BNI Menyapa – BNI Football League 2025: A Collaborative Platform to Promote Employee Work-Life Balance
25	February 11, 2025	BNI Menyapa – Purchase ORI027 via wondr by BNI: More Practical with Attractive Cashback up to IDR27 Million
26	February 14, 2025	BNI Menyapa – BNI Jejak Kopi Khatulistiwa Supports Garut Coffee Self-Sufficiency and Global Expansion

No	Date	Subject E-mail
27	February 17, 2025	BNI Menyapa – Preventing Stunting, BNI Provides Nutritious Meals and Smart Parenting Programs in Tasikmalaya
28	February 13, 2025	BNI Menyapa – Healthy and High-Performing, BNI Wins Badminton Tournament at the Infobank Sport Competition 2025
29	February 12, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Smart Strategies for Managing Bonuses and THR
30	February 17, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: BNI Road to Zero Waste "Let's Sort, Recycle, and Reuse!"
31	February 17, 2025	BNI Menyapa – Purchase ORI027 via wondr by BNI: More Practical with Attractive Cashback up to IDR27 Million
32	February 17, 2025	BNI Menyapa – Making History, BNI Appreciates Indonesia's Victory at the Badminton Asia Mixed Team Championship 2025
33	February 17, 2025	BNI Menyapa – Appreciation of 2023 Performance Achievements
34	February 18, 2025	BNI Menyapa – BNI Listed among TIME's 500 Best Companies in Asia-Pacific
35	February 18, 2025	BNI Menyapa – BNI Football League 2025: A Collaborative Platform to Promote Employee Work-Life Balance
36	February 20, 2025	BNI Menyapa – BNI Disburses Supply Chain Financing for APP Group Partners
37	February 20, 2025	BNI Menyapa – Grand Final Pitching BINNOVA Batch 4–2024: Data Quality Innovation
38	February 21, 2025	BNI Menyapa – Communication Workshop: BNI Optimizes the Role of SOEs in Building Indonesia's Global Image
39	February 21, 2025	BNI Menyapa – Strengthening Digitalization Synergy, BNI and ACC Establish Autopay Service Cooperation
40	February 21, 2025	BNI Menyapa – Manage Your Bonus Smartly for a Higher-Quality Future
41	February 21, 2025	BNI Menyapa – Appreciation of 2024 Performance Achievements
42	February 25, 2025	BNI Menyapa – Happy Payday, BNI Hi-Movers!
43	February 26, 2025	BNI Menyapa – Supporting Electric Vehicle Expansion in Indonesia, BNI Partners with Geely
44	February 26, 2026	BNI Menyapa – BNI CorpU TV Knowledge Supplement: "Elevating Transactions with BNIdirect Cash – Operating Account"
45	February 26, 2025	BNI Menyapa – Manage Your Bonus Smartly for a Higher-Quality Future
46	February 26, 2025	BNI Menyapa – Strengthening Digitalization Synergy, BNI and ACC Establish Autopay Service Cooperation
47	February 27, 2025	BNI Menyapa – BNI Supports Bakti BUMN Volunteers in Pamekasan, Empowering MSMEs and Protecting the Environment
48	February 27, 2025	BNI Menyapa – Appreciation of 2024 Performance Achievements
49	February 27, 2025	BNI Menyapa – Providing Financial Literacy, BNI Shares Investment Tips for Gen Z
50	February 28, 2025	BNI Menyapa – Happy Payday, BNI Hi-Movers!
51	February 28, 2025	BNI Menyapa – Preserving the Cultural Heritage of Weaving through Support for the Cita Raya HIKAYAT Fashion Show
52	February 28, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: "Strengthening Anti-Fraud Awareness through the Implementation of POJK No. 12 of 2024 for Financial Services Institutions"
53	March 3, 2025	BNI Menyapa – WDC Newsletter January Wrap-Up – Volume 12, February Issue
54	March 4, 2025	BNI Menyapa – Notification of BNI's Positive Performance Achievement for January 2025
55	March 4, 2025	BNI Menyapa – Short, Simple, and Fun: Convert 0% Credit Card Installments with wondr by BNI
56	March 6, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: "Ramadan Spiritual Lecture: Enhancing Spiritual and Social Piety"
57	March 10, 2025	BNI Menyapa – Special Promotions at Samsung EPP with BNI Credit Cards
58	March 10, 2025	BNI Menyapa – Wholesale Corner Level Up – Check It Out Now!
59	March 11, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: "Ramadan Spiritual Lecture: Zakat—Caring Is Cool"
60	March 17, 2025	BNI Menyapa – BNI and VinFast Sign MoU to Accelerate the Green Mobility Ecosystem in Indonesia
61	March 18, 2025	Financial Tips – Managing THR with BNI Asset Management
62	March 19, 2025	BNI CorpU TV Knowledge Supplement: Socialization of the Jawara Transaksi Program 2025
63	March 19, 2025	Commitment to the Implementation of Good Corporate Governance
64	March 20, 2025	BNI Menyapa – Wondrful Ramadan 2025: BNI Strengthens Bonds and Spreads Joy During the Holy Month

No	Date	Subject E-mail
65	March 20, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: "Productive in This World, Blessed in the Hereafter: An Islamic Approach to Time Management"
66	March 21, 2025	BNI Menyapa – Wondrful Ramadan: The Beauty of Sharing in Celebrating the Night of the Qur'an's Revelation
67	March 24, 2025	BNI Menyapa – Limited BNI Operations during Nyepi Holiday and Idul Fitri 2025
68	March 25, 2025	BNI Menyapa – BNI Provides IDR20,000 Banknotes at 41 ATMs from Lampung to Papua
69	March 27, 2025	BNI Menyapa – BNI AGM Approves Total Cash Dividend of IDR13.95 Trillion or IDR374 per Share
70	March 28, 2025	BNI Menyapa – Exclusive for Employees: Enjoy Discounts of Up to 10% at Optik Melawai
71	March 30, 2025	BNI Menyapa – Unique Design of wondr by BNI Goes Global, Wins the iF Design Award 2025
72	March 30, 2025	BNI Menyapa – BNI Successfully Organizes Free Homecoming 2025, Dispatches 121 Buses to Purwokerto and Padang
73	April 9, 2025	BNI Menyapa – BNI Holds Halalbihalal, Introduces New Board of Directors and Commissioners to Hundreds of Employees
74	April 9, 2025	BNI Menyapa – BNI Supports the Music Industry through the Celebration of Two Decades of the Java Jazz Festival
75	April 11, 2025	BNI Menyapa – BINNOVA Batch 5–2025 Is Open! Hi-Movers, It's Time to Submit Your Brilliant Ideas
76	April 11, 2025	BNI Menyapa – BNI's Strategy to Maintain Performance amid Rupiah Weakening
77	April 11, 2025	BNI Menyapa – Get the iPhone 16 Series Using BNI Credit Cards with 0% Installments for 1 Month
78	April 14, 2025	BNI Menyapa – With Support from BNI Xpora, Indo Tropikal Ginger Candy Producer Breaks into Export Markets
79	April 14, 2025	BNI Menyapa – BNI e-Learning Festival 2025 Officially Kicks Off
80	April 15, 2025	BNI Menyapa – BINNOVA Batch 5–2025 Is Open! Hi-Movers, It's Time to Submit Your Brilliant Ideas
81	April 15, 2025	BNI Menyapa – BINNOVA Batch 5–2025 Is Open! Hi-Movers, It's Time to Submit Your Brilliant Ideas
82	April 16, 2025	BNI Menyapa – BNI e-Learning Festival Roadshow Vol. 1
83	April 17, 2025	BNI Menyapa – Increase Your Balance and Transactions: Rejeki wondr BNI to Give Away Chery J6 up to Mercedes-Benz
84	April 17, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: BNIdirect Supply Chain Financing Solution "Redefining Efficiency, Agility, and Innovation"
85	April 21, 2025	BNI Menyapa – Every Purchase Becomes More Exciting with BNI Credit Cards
86	April 24, 2025	BNI Menyapa – Rejeki wondr BNI Is Back!
87	April 25, 2025	BNI Menyapa – BNI Supports the Indonesian Badminton Team Competing at the Sudirman Cup 2025
88	April 25, 2025	BNI Menyapa – BNI Leads an IDR1.84 Trillion Syndicated Loan to Build VinFast Electric Vehicle Plant in Indonesia
89	April 27, 2025	BNI Menyapa – BNI Partners with IKA ITS to Support the Advancement of Higher Education in Indonesia
90	April 28, 2025	BNI Menyapa – BNI Continues Solid Performance Growth, Loans and Savings Increase by 10% in Q1 2025
91	April 28, 2025	BNI Menyapa – Rejeki wondr BNI Raffle at the GIOI Wondrful Run, 500 Runners Enliven Sunday Morning CFD
92	April 29, 2025	BNI Menyapa – BNI Wins Three Awards from The Digital Banker, Reinforcing the Strategic Role of BNIdirect
93	April 29, 2025	BNI Menyapa – BNI e-Learning Festival Roadshow Vol. 2
94	April 30, 2025	BNI Menyapa – WDC Newsletter March Wrap-Up – Volume 14, April Issue
95	May 5, 2025	BNI Menyapa – Rejeki wondr BNI Event "Serbu CFD": Encouraging a Healthy Lifestyle with Chances to Win Attractive Prizes
96	May 5, 2025	BNI Menyapa – BNI and Emirates Reintroduce the 2025 Travel Fair with Special Prices and Cashback up to IDR6 Million
97	May 5, 2025	BNI Menyapa – Information on the Closure of BNI Mobile Banking
98	May 5, 2025	BNI Menyapa – BNI Records an Increase in Premium Customer Transactions at the BNI–Emirates Travel Fair 2025 Private Event
99	May 5, 2025	BNI Menyapa – Gradual Closure of BNI Mobile Banking for All Employees
100	May 6, 2025	BNI Menyapa – BNI Simplifies SMM PTN Barat Payments via wondr by BNI App with IDR50,000 Cashback

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101	May 6, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Health Webinar Series "Basic Life Support – Mastering CPR Techniques"
102	May 7, 2025	BNI Menyapa – BNI Targets Young Investors to Manage Investments through the New BIONS
103	May 9, 2025	BNI Menyapa – Get 50% Cashback When Using BNI Credit Cards
104	May 14, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Sales Excellence Webinar Series "Customer First – Becoming a Relevant and Needed Marketer"
105	May 16, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Sales Excellence Webinar Series "Customer First – Becoming a Relevant and Needed Marketer"
106	May 19, 2025	BNI Menyapa – BNI Provides Solutions to Accelerate Supply Chain Financing through BNIdirect
107	May 19, 2025	BNI Menyapa – From Bekasi to Probolinggo, BNI Supports Infrastructure Improvements to Drive Rural Economic Growth
108	May 21, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: ThickTalk Podcast Series Rejeki wondr BNI
109	May 22, 2025	BNI Menyapa – BNI Wins CIO of the Year Award at the ASEAN Fintech Awards 2025, Strengthening Its Transformation Commitment
110	May 22, 2025	BNI Menyapa – BNI Holds a Golf Clinic to Strengthen Relationships with the Next Generation of Private Banking Customers
111	May 22, 2025	BNI Menyapa – USS Wave-1 2025
112	May 23, 2025	BNI Menyapa – Andien Enlivens BNI Java Jazz on The Move at Sarinah
113	May 23, 2025	BNI Menyapa – WDC Newsletter April Wrap-Up – Volume 15, May Issue
114	May 26, 2025	BNI Menyapa – BNI and OJK Encourage Financial Literacy among University Students
115	May 26, 2025	BNI Menyapa – BNI Wins Three Triple A Awards 2025 for BNIdirect Innovation and Its Role in Government Programs
116	May 26, 2025	BNI Menyapa – BNI and OJK Encourage Financial Literacy among University Students
117	May 27, 2025	BNI Menyapa – BNI's Strategy to Accelerate MSME Digitalization to Compete Globally
118	May 27, 2025	BNI Menyapa – BNI's Strategy to Maintain Liquidity and Drive Credit Growth amid a Low Interest Rate Environment
119	May 29, 2025	BNI Menyapa – BNI Presents a Wondrful Experience to Celebrate 20 Years of Java Jazz
120	May 31, 2025	BNI Menyapa – Activate wondr by BNI and Enjoy Various Benefits at the BNI Java Jazz Festival 2025
121	May 31, 2025	BNI Menyapa – Andien and Jacob Collier Perform at BNI Wondrhall, Java Jazz Festival 2025
122	June 1, 2025	BNI Menyapa – Collect Stamps at the wondr Treasure Hunt: An Exciting Rejeki wondr BNI Mission at Java Jazz Festival 2025
123	June 1, 2025	BNI Menyapa – A Lineup of Top Musicians at the BNI Java Jazz Festival 2025
124	June 1, 2025	BNI Menyapa – A Variety of MSMEs Featuring Indonesian Flavors Enliven the BNI Java Jazz Festival 2025
125	June 1, 2025	BNI Menyapa – Saving While Enjoying Jazz: BNI's Unique Way to Attract New Customers
126	June 3, 2025	BNI Menyapa – USS Wave-1 2025
127	June 4, 2025	BNI Menyapa – BNI-Assisted MSMEs Export 27 Tons of Hairtail Fish to China
128	June 5, 2025	BNI Menyapa – Extraordinary Efforts of Indonesia's Men's Doubles Sector in the Semifinals of the Indonesia Open 2025
129	June 8, 2025	BNI Menyapa – Extraordinary Efforts of Indonesia's Men's Doubles Sector in the Semifinals of the Indonesia Open 2025
130	June 11, 2025	BNI Menyapa – Installment Conversion Program for June 2025
131	June 11, 2025	BNI Menyapa – Risk Management Webinar: "Dive into Sustainability Disclosure"
132	June 12, 2025	BNI Menyapa – Commemorating Entrepreneurship Day, BNI Supports MSMEs to Scale Up, Be Sustainable, and Go Global
133	June 12, 2025	BNI Menyapa – BNI's Tangible Contribution to the Infrastructure Sector, Supporting Connectivity and Economic Equity
134	June 13, 2025	BNI Menyapa – BNI Disburses IDR4.6 Trillion in KUR to More Than 20,000 MSMEs, Strengthening the Backbone of the National Economy
135	June 16, 2025	BNI Menyapa – BNI and Republikorp Establish Synergy to Support the Independence of the National Defense Industry
136	June 17, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Digital Trends and Skills to Empower Digital Leadership Series #2 "Strategic Digital Leadership: Mastering Digital Leadership—Digital Marketing & Business Growth Optimization"

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137	June 19, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Healthy Talk Series "Preventing and Managing Diabetes for the Future"
138	June 20, 2025	BNI Menyapa – BNI Strengthens Campus Digital Financial Ecosystems and Disburses CSR for UNSADA Students
139	June 20, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Healthy Talk Series "Preventing and Managing Diabetes for the Future"
140	June 23, 2025	BNI Menyapa – BNI Receives International Recognition as One of the Best Companies to Work for in Asia
141	July 1, 2025	BNI Menyapa – BNI Wins 16 Awards at BSEA 2025, Demonstrating Consistent Service Excellence and Sustainable Innovation
142	July 3, 2025	BNI Menyapa – Consistently Upholding Corporate Governance, BNI Wins the Excellence GCG Award 2025
143	July 3, 2025	BNI Menyapa – BNI Helps Rumah Tempe Azaki Penetrate Export Markets through BNIdirect
144	July 3, 2025	BNI Menyapa – Consistently Upholding Corporate Governance, BNI Wins the Excellence GCG Award 2025
145	July 3, 2025	BNI Menyapa – Reinforcing Digital Commitment, BNI Wins Best Digital Banking Innovation Adoption 2025
146	July 4, 2025	BNI Menyapa – Contributing to Public Digitalization, BNI Wins Two GovMedia Awards 2025
147	July 4, 2025	BNI Menyapa – Watch the Grand Night of the BEE Award 2025 Appreciation "Ignite Your Wondr"!
148	July 5, 2025	BNI Menyapa – 79 Years of BNI "Accompanying Every Step of Your Journey"
149	July 5, 2025	BNI Menyapa – Message from the President Director of BNI on the Occasion of BNI's 79th Anniversary
150	July 6, 2025	BNI Menyapa – Thanksgiving Ceremony for the 79th Anniversary of PT Bank Negara Indonesia (Persero) Tbk
151	July 7, 2025	BNI Menyapa – Welcoming the 79th Anniversary, BNI Treats Customers with "Serba 79" Promotions and a Spectacular Raffle
152	July 8, 2025	BNI Menyapa – Outstanding Performance: 60 BNI Employees Recognized at the BEE Award 2025
153	July 10, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Awareness and Prudential Principles in Credit Granting for Higher-Quality Loans
154	July 10, 2025	BNI Menyapa – Samsung Galaxy Z Fold7
155	July 10, 2025	BNI Menyapa – Installment Conversion Program for July 2025
156	July 11, 2025	BNI Menyapa – BNI Launches wondr Multicurrency Feature, Supporting Customers to Become Global Citizens
157	July 14, 2025	BNI Menyapa – Shopping Gets More Exciting! BNI Shopping Race in 14 Cities to Celebrate the 79th Anniversary
158	July 15, 2025	BNI Menyapa – Celebrating the 79th Anniversary, BNI Offers Discounts from PIK to Bintaro
159	July 16, 2025	BNI Menyapa – BNI Holds a Collateral Asset Auction, Opening Property Investment Opportunities Starting from IDR50 Million
160	July 17, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Webinar "79 Years of BNI Accompanying Every Step of Your Journey"
161	July 17, 2025	BNI Menyapa – Exclusive for BNI Employees! Don't Miss Special Culinary Discounts in Bali
162	July 18, 2025	BNI Menyapa – Preserving Heritage and Moving Forward, BNI Commemorates Its 79th Anniversary with a Flower-Laying Ceremony
163	July 21, 2025	BNI Menyapa – Emulating the Founders' Spirit, BNI Holds a Flower-Laying Ceremony at the Grave of R.M. Margono Djojohadikoesoemo
164	July 22, 2025	BNI Menyapa – BNI Accompanies Every Step through wondrfest x senada seirama fest in Region 06
165	July 24, 2025	BNI Menyapa – From Region 16, Papua Land, BNI Showcases the Spirit of Struggle through wondrfest Papua
166	July 25, 2025	BNI Menyapa – BNI Wins the BRAVO 500 Summit Awards 2025 for Digital Financial Inclusion Innovation
167	July 25, 2025	BNI Menyapa – Strengthening Liquidity and Asset Quality Management as the Foundation of BNI's Performance in 1H 2025
168	July 26, 2025	BNI Menyapa – BNI wondrX 2025: Discover Homes, Cars, Vacations, and More Surprises
169	July 28, 2025	BNI Menyapa – BNI Appreciates Fajar/Fikri's Victory at the China Open 2025
170	July 30, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Empowering SMEs with BNIdirect Business
171	July 31, 2025	BNI Menyapa – Beware of Digital Crimes, BNI Reminds the Public to Safeguard Three Sensitive Data
172	August 5, 2025	BNI Menyapa – BNI Encourages Indonesian Tennis Achievements on the Global Stage
173	August 6, 2025	BNI Menyapa – Time to Look More Glowing! Enjoy Exclusive Promotions from BNI
174	August 7, 2025	BNI Menyapa – BNI: Temporary Blocking of Dormant Accounts by PPATK to Protect Customer Funds

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175	August 7, 2025	BNI Menyapa – BNI wondrX 2025 Presents Financial Service Innovations in an Integrated Expo
176	August 9, 2025	BNI Menyapa – BNI and SMF Integrate Digital Payment Services to Support the 3 Million Homes Program
177	August 11, 2025	BNI Menyapa – BNI Celebrates Its 79th Anniversary with Real Action by Greening Tiris Beach
178	August 11, 2025	BNI Menyapa – WDC Newsletter July Wrap-Up – Volume 17, August Issue
179	August 11, 2025	BNI Menyapa – Installment Conversion Program Period August 5–September 4, 2025
180	August 12, 2025	BNI Menyapa – BNI Announces Winners of the First Phase of the Rejeki wondr Draw
181	August 12, 2025	BNI Menyapa – Logo of the 80th Anniversary of the Republic of Indonesia
182	August 13, 2025	BNI Menyapa – BNI Brings Global Financial Solutions for the Diaspora at the Diaspora Global Summit 2025
183	August 14, 2025	BNI Menyapa – Watch the Live Broadcast of the President of the Republic of Indonesia's Address
184	August 15, 2025	BNI Menyapa – Explore a Variety of Exciting Experiences at BNI wondrX 2025
185	August 15, 2025	BNI Menyapa – BNI wondrX 2025 Officially Opens, Offering Attractive Mortgage, Auto Loan, and Holiday Package Promotions
186	August 15, 2025	BNI Menyapa – BNI and JCB Launch a Premium Corporate Credit Card for Japanese Companies in Indonesia
187	August 15, 2025	BNI Menyapa – BNI Launches a New Digital Platform for MSMEs during the 79th Anniversary
188	August 15, 2025	BNI Menyapa – 80th Independence Day People's Festival "Make Independence Even More Fun"
189	August 16, 2025	BNI Menyapa – Day Two of BNI wondrX 2025, BNI Ensures Easy and Free Access to ICE BSD
190	August 16, 2025	BNI Menyapa – BNI Invites wondrX 2025 Visitors to Enjoy Japanese Culinary Experiences and Attractive Promotions
191	August 16, 2025	BNI Menyapa – BNI Distributes the First Phase of Rejeki wondr Prizes, Opportunities Remain Until February 2026
192	August 17, 2025	BNI Menyapa – Independence Carnival, 80th Independence Day People's Festival "Make Independence Even More Fun"
193	August 17, 2025	BNI Menyapa – Commemoration Ceremony of the 80th Anniversary of the Proclamation of Indonesian Independence
194	August 19, 2025	BNI Menyapa – BNI wondrX 2025 Records 80,000 Visitors with Transactions Reaching IDR2.5 Trillion
195	August 25, 2025	BNI Menyapa – BNI and ITB Hold a Community Run Ahead of the wondr ITB Ultra Marathon 2025
196	August 25, 2025	BNI Menyapa – BNI Strengthens Support for ITB and Alumni through Inclusive Financial Innovation
197	August 31, 2025	BNI Menyapa – Adjustment of Work Arrangements in Anticipation of Public Demonstrations and Reminder on Wise Use of Social Media
198	September 2, 2025	BNI Menyapa – WDC Newsletter July Wrap-Up – Volume 18, August Issue
199	September 2, 2025	BNI Menyapa – Let's Use the National Customer Day 2025 Twibbon
200	September 9, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: LinkGoals Series "Build Your Brand, Boost Your Career"
201	September 9, 2025	BNI Menyapa – "Enjoy Smart Shopping with Easy Installments via wondr by BNI!"
202	September 15, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: "Decision-Making Based on the Business Judgment Rule in the Context of Good Corporate Governance and Anti-Corruption"
203	September 18, 2025	BNI Menyapa – Watch the Grand Final Pitching BINNOVA Batch 5–2024 "Operations Excellence"
204	September 18, 2025	BNI Menyapa – BNI Strengthens Integrity and GCG through a Compliance Forum with KPK
205	September 23, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Smart Parent, Smart Future with BNI Life Smart Solutions
206	September 25, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Strategies for Addressing International Trade Remedies
207	September 26, 2025	BNI Menyapa – BNI Strengthens ESG Commitment through Orangutan Conservation and Forest Rehabilitation
208	September 29, 2025	BNI Menyapa – Let's Optimize BNI Publications through Internal Communication Channels
209	October 3, 2025	BNI Menyapa – BNI Promotes Transparency through Education on the International Right to Know Day
210	October 7, 2025	BNI Menyapa – WDC Newsletter August Wrap-Up – Volume 19, September Issue
211	October 7, 2025	BNI Menyapa – BNI Partners with Developers in Serang to Accelerate the Realization of the 3 Million Homes Program
212	October 8, 2025	BNI Menyapa – USS Wave 2 2025
213	October 11, 2025	BNI Menyapa – Optimizing BNI's Internal Communication Channels

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214	October 15, 2025	BNI Menyapa – BNI Dominates the Financial Services Basketball League 2025: Men's Team Champions, Women's Team Runners-Up
215	October 16, 2025	BNI Menyapa – BNI CorpUTV Knowledge Supplement: Webinar "Leading Business: The Future of Banking – Artificial Intelligence & Blockchain Innovation"
216	October 17, 2025	BNI Menyapa – Happy Birthday to the President of the Republic of Indonesia
217	October 20, 2025	BNI Menyapa – BNI CorpUTV Knowledge Supplement: Sales Excellence Webinar Series "From Seller to Trusted Advisor: Building Long-Term Customer Relationships"
218	October 24, 2025	BNI Menyapa – BNI Successfully Organizes a National Mass Contract Signing, Driving MSME Financing and Job Creation
219	October 24, 2025	BNI Menyapa – BNI Records Solid Fundamental Performance in Q3 2025, with Digitalization and CASA as Growth Drivers
220	October 24, 2025	BNI Menyapa – BNI Successfully Organizes a National Mass Contract Signing, Driving MSME Financing and Job Creation
221	October 25, 2025	BNI Menyapa – wondr JRF 2025 Officially Kicks Off, BNI Invites 27,300 Runners to Drive the Economy and Protect the Environment
222	October 30, 2025	BNI Menyapa – BNI Strengthens Financial Inclusion and Digital Transactions through FinExpo 2025
223	October 31, 2025	BNI Menyapa – Indonesia Dominates the wondr by BNI Indonesia Masters 2025, Demonstrating BNI's Commitment to Athlete Regeneration
224	November 3, 2025	BNI Menyapa – BNI and ITS Promote Digital Education Philanthropy through the ITS Endowment Fund
225	November 4, 2025	BNI Menyapa – BNI CorpUTV Knowledge Supplement: Sales Excellence Webinar Series "Active Acquisition: Effective Strategies to Capture New Customer Potential"
226	November 5, 2025	BNI Menyapa – WDC Newsletter September Wrap-Up – Volume 20, October Issue
227	November 6, 2025	BNI Menyapa – BNI Launches BRAVE Transformation to Strengthen Competitiveness and Market Share
228	November 7, 2025	BNI Menyapa – BNI Wins Award for Its Contribution to MSME Empowerment and Inclusive Village Finance
229	November 11, 2025	BNI Menyapa – BNI Supports the National Film Industry through Collaboration with Iko Uwais in the Film "TIMUR"
230	November 12, 2025	BNI Menyapa – Worry-Free Transactions: Installments via wondr by BNI Make Life Happier
231	November 12, 2025	BNI Menyapa – BNI Supports National Food Security through Participation in Agrinex Expo 2025
232	November 12, 2025	BNI Menyapa – BNI Supports the National Film Industry through Collaboration with Iko Uwais in the Film "TIMUR"
233	November 13, 2025	BNI Menyapa – BNI Wins Award for Its Contribution to MSME Empowerment and Inclusive Village Finance
234	November 13, 2025	BNI Menyapa – BNI CorpUTV Knowledge Supplement: Wholesale Webinar Series "Socialization of Standard Pricing, Sales Cue Cards, and Standard Product Decks"
235	November 14, 2025	BNI Menyapa – BNI Wins the Leadership AA Award at the Indonesia ESG Leadership Awards 2025
236	November 14, 2025	BNI Menyapa – BNI Supports the Revival of the Creative Ecosystem through ICCF 2025 in Greater Malang
237	November 14, 2025	BNI Menyapa – BNI Wins the Women in SDGs Action Award 2025, Demonstrating a Strong Commitment to Poverty Alleviation
238	November 17, 2025	BNI Menyapa – BNI Holds Phase 3 of the Shopping Race in 13 Major Cities, Promoting Digital Literacy and Transactions
239	November 17, 2025	BNI Menyapa – Gregoria's Hat-Trick Podium Finish at the Kumamoto Masters Japan, BNI Supports Indonesian Athletes on the Global Stage
240	November 19, 2025	BNI Menyapa – BNI Holds Phase 3 of the Shopping Race in 13 Major Cities, Promoting Digital Literacy and Transactions
241	November 20, 2025	BNI Menyapa – SP BNI National Working Meeting Formulates a Strategic Agenda for Sustainable Performance
242	November 20, 2025	BNI Menyapa – BNI Launches Indonesia's First ESG Advisory Playbook, Accelerating the Green Transformation of the Palm Oil Industry
243	November 24, 2025	BNI Menyapa – BNI Supports Global Achievement, Indonesia Hosts Two All-Indonesian Finals at the Australia Open 2025
244	November 26, 2025	BNI Menyapa – Brilliant Debut of Raymond/Joaquin at the BWF Super 500 Level
245	November 26, 2025	BNI Menyapa – BNI Drives Local Economic Growth through MSMEs at an International Event in Yogyakarta
246	November 26, 2025	BNI Menyapa – Indonesia Dominates the Podium at the wondr by BNI International Challenge, Youth Athlete Development Bears Fruit
247	November 26, 2025	BNI Menyapa – BNI Provides Exclusive Access to the wondr BrightUp Cup 2025 through Buy 1 Get 2 Offers on wondr by BNI
248	November 26, 2025	BNI Menyapa – SP BNI National Working Meeting Formulates a Strategic Agenda for Sustainable Performance

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250	November 27, 2025	BNI Menyapa – BNI Launches BRAVE Transformation to Strengthen Competitiveness and Market Share
251	November 28, 2025	BNI Menyapa – BNI Supports the Revival of the Creative Ecosystem through ICCF 2025 in Greater Malang
252	November 28, 2025	BNI Menyapa – Time to Hunt for Promotions at the wondrful Dwidayatour Fest 2025
253	December 3, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Part 1 BNI Inspiring Talk BOC/BOD Series "Roots, Values, and the Life Journey of the Guardian of Integrity"
254	December 3, 2025	BNI Menyapa – Make Your Bills Lighter with Installments via wondr by BNI!
255	December 5, 2025	BNI Menyapa – Strengthening BNI's Integrity in the Momentum of Anti-Corruption Day (HAKORDIA) 2025
256	December 5, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Part 2 BNI Inspiring Talk BOC/BOD Series "This Is How to Read People! The Rarely Known Art of Verification"
257	December 12, 2025	BNI Menyapa – WDC Newsletter – Volume 21, November 2025 Issue
258	December 16, 2025	BNI Menyapa – Srikandi BNI Talkshow, Women in Celebration Week 2025
259	December 17, 2025	BNI Menyapa – BNI CorpU TV Knowledge Supplement: Leadership Accelerator Essentials Webinar "Growing Your Business: Elevating Business Performance Through Market Expansion"
260	December 22, 2025	BNI Menyapa – Upholding Integrity, Realizing Good Corporate Governance
261	December 22, 2025	BNI Menyapa – National Mother's Day Reflection: Serving Wholeheartedly with BNI
262	December 22, 2025	BNI Menyapa – National Mother's Day Reflection: Serving Wholeheartedly with BNI
263	December 23, 2025	BNI Menyapa – Upholding Integrity, Realizing Good Corporate Governance
264	December 24, 2025	BNI Menyapa – Shopping Feels Lighter, Bigger Rewards with wondr by BNI!
265	December 25, 2025	BNI Menyapa – A Meaningful Christmas, Welcoming the New Year with Shared Hope
266	December 25, 2025	BNI Menyapa – Srikandi BNI Affirms the Strategic Role of Women in BNI's Transformation and Competitiveness
267	December 25, 2025	BNI Menyapa – Comfortable Holidays, Secure Transactions: Avoid Cyber Attacks

E-SINERGI 46

In building effective internal communication and to foster a sense of pride as part of the BNI family, the Bank provides an internal communication platform in the form of the E-Sinergi 46 application which can only be accessed by BNI Hi-Movers personnel in the form of mobile apps and web-based, which can be downloaded on the Google Play Store and App Store. This application presents content in various formats, including text, photos, and videos, thus providing variation in the delivery of information.

To be able to attract more downloaders on the e-sinergi46 Application, BNI continues to innovate in presenting interesting content, including by presenting a gamification program that offers reward points. With the implementation of this program, every activity carried out through the application will generate points that can be exchanged for various useful purposes, such as purchasing credit, data packages, vouchers, paying PLN bills, and top ups for Link Aja, GoPay, and OVO. In addition, the E-Sinergi 46 manager also provides incentives to employees who contribute to sending news from each work unit. In this way, E-Sinergi 46 not only functions as a means of sharing information, but also encourages employees to be more active in participating, creating a community that is interconnected and shares knowledge.

Throughout 2025, E-Sinergi 46 has published 438 news articles, as follows:

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3	January 6, 2025	Celebrating 37 Years, Indonesian Restaurant in Hong Kong Renovates with BNI Diaspora Loan	528
4	January 9, 2025	BNI Supports KUR Distribution for Indonesian Migrant Workers	225
5	January 14, 2025	Palembang Entrepreneur Expands Culinary Business in Seoul Using BNI Diaspora Loan	235
6	January 16, 2025	Hosting Economic Dialogue, Coordinating Minister Airlangga and BNI President Director Discuss Challenges and Growth Opportunities for 2025	209
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12	January 21, 2025	Supporting President Prabowo's Asta Cita, BNI Strengthens Corporate Governance and Anti-Corruption Efforts	250
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259	July 24, 2025	BNI Wins the BRAVO 500 Summit Awards 2025 for Digital Financial Inclusion Innovation	120
260	July 25, 2025	Strengthening Liquidity and Asset Quality Management as the Foundation of BNI's Performance in H1 2025	117
261	July 25, 2025	BNI wondrX 2025 – Discover Homes, Cars, Vacations, and More Surprises	128
262	July 25, 2025	BNI Appreciates Fajar/Fikri's Victory at the 2025 China Open	—
263	July 28, 2025	From Ecosystems to the Economy, BNI Builds the Future Through Mangrove Forests	100
264	July 29, 2025	BNI wondrX 2025 Presents an Integrated and Interactive Financial Experience for the Public	102
265	July 30, 2025	BNI CorpU TV Knowledge Supplement: Empowering SMEs with BNIdirect Business	109
267	July 30, 2025	BNI Gets Closer to Customers Through the BGA Tournament 2025 with Wondrful BNIdirect at the 79th Anniversary	185
268	July 31, 2025	BNI Holds the wondr Futsal Series 2025 in Surabaya, Driving Young Talent and Digital Financial Inclusion	103
269	July 31, 2025	Beware of Digital Crime, BNI Reminds the Public to Protect Three Sensitive Data Points	167
270	August 2, 2025	UPZ BAZNAS BNI Provides Access to Clean Water for Madrasah Tahfidz Al-Qur'an Albayaan Lil Banaat, Cikarang	146
271	August 5, 2025	BNI Encourages Indonesian Tennis Achievements on the Global Stage	102
272	August 5, 2025	BNI: Temporary Blocking of Dormant Accounts by PPATK to Protect Customer Funds	141
273	August 6, 2025	Time to Look More Glowing! Enjoy Exclusive Promotions from BNI	107
274	August 7, 2025	BNI wondrX 2025 Presents Financial Service Innovations in One Integrated Expo	138
275	August 7, 2025	BNI and SMF Integrate Digital Payment Services to Support the 3 Million Homes Program	118
276	August 9, 2025	BNI Celebrates Its 79th Anniversary with Real Action by Greening Tiris Beach	140
277	August 9, 2025	Newsletter WDC July Wrap-Up – Volume 17 Issue: August	122
278	August 12, 2025	Logo of the 80th Anniversary of the Republic of Indonesia	417
279	August 13, 2025	BNI Brings Global Financial Solutions for the Diaspora at the Diaspora Global Summit 2025	77
280	August 13, 2025	BNI Shares the Festivities of Its 79th Anniversary in Makassar Through A Festival Experience by Persuasif	134

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281	August 14, 2025	Watch the Live Broadcast of the President of the Republic of Indonesia's Address	115
282	August 15, 2025	BNI wondrX 2025 Officially Opens, Offering Attractive Mortgage, Auto Loan, and Travel Package Promotions	125
283	August 15, 2025	BNI and JCB Launch Premium Corporate Credit Cards for Japanese Companies in Indonesia	102
284	August 15, 2025	BNI Launches a New Digital Platform for MSMEs on the Occasion of Its 79th Anniversary	116
285	August 16, 2025	BNI Distributes the First Phase of Rejeki wondr BNI Prizes, Opportunities Remain Open Until February 2026	119
286	August 16, 2025	Day Two of BNI wondrX 2025, BNI Ensures Easy and Free Access to ICE BSD	111
287	August 16, 2025	BNI Invites wondrX 2025 Visitors to Enjoy Japanese Culinary Experiences and Attractive Promotions	137
288	August 16, 2025	Cheap Air Tickets and Shopping Promotions Become Highlights for Visitors at BNI wondrX 2025	138
289	August 17, 2025	BNI Presents wondrstage at Dukuh Atas to Enliven the 80th Independence Day People's Festival	97
290	August 17, 2025	BNI Offers a Global Citizen Experience Through the wondr Multicurrency Feature at BNI wondrX 2025	135
291	August 19, 2025	BNI wondrX 2025 Records 80,000 Visitors with Transactions Reaching IDR2.5 Trillion	119
292	August 19, 2025	BNI Supports the Use of AI to Strengthen State-Owned Enterprise Communications	127
293	August 22, 2025	BNI CorpU TV Knowledge Supplement: Retirement Readiness Checkpoint Webinar Series "Second Career Inspiration"	172
294	August 25, 2025	BNI and ITB Hold a Community Run Ahead of the wondr ITB Ultra Marathon 2025	81
295	August 25, 2025	BNI Strengthens Support for ITB and Alumni Through Inclusive Financial Innovation	106
296	August 25, 2025	BNI and ITB Hold the wondr ITB Ultra Marathon 180 KM, Promoting a Healthy and Inclusive Lifestyle	127
297	August 26, 2025	BNI Wins Two OJK Awards for Its Commitment to Financial Literacy	103
298	August 28, 2025	House of Representatives Commission XI Appreciates the wondr Multicurrency Feature, Encouraging Global Transaction Efficiency	104
299	August 29, 2025	BNI Welcomes BI Interest Rate Cuts, Calling Them a Stimulus for the Economy	106
300	September 1, 2025	Adjustment of Work Arrangements as an Anticipation of Demonstrations and a Reminder on Wise Use of Social Media	94
301	September 2, 2025	BNI Strengthens Stunting Reduction Programs in NTT and Banten	107
302	September 3, 2025	BNI Strengthens Support for MSMEs Through Productive Credit and Digital Innovation	106
303	September 4, 2025	BNI Strengthens Green and Inclusive Commitment on National Customer Day	76
304	September 4, 2025	Happy National Customer Day 2025	111
305	September 8, 2025	Watch the Live Broadcast of BNI Public Expose 2025	88
306	September 8, 2025	"Enjoy Smart Shopping with Light Installments via wondr by BNI!"	81
307	September 8, 2025	BNI CorpU TV Knowledge Supplement: LinkGoals Series "Build Your Brand, Boost Your Career"	99
308	September 8, 2025	Digital Transformation and Credit Diversification Become Pillars of BNI's Performance in H1 2025	104
309	September 9, 2025	Furniture MSMEs from Klaten Penetrate Export Markets with Support from BNI Xpora	102
310	September 10, 2025	BNI Strengthens Education Quality in NTB Through Teacher Certification and Student Character Development	88
311	September 12, 2025	BNI Swiftly Distributes Emergency Aid for Flash Flood Victims in Bali and NTT	71
312	September 12, 2025	BNI Supports Government Policy to Withdraw IDR200 Trillion to Strengthen Banking Liquidity	89
313	September 14, 2025	BNI and BBNI Sekuritas Win Two International Euromoney Awards	51
314	September 14, 2025	BNI Becomes the Official Non-Cash Transaction Partner at IDW 2025	94
315	September 15, 2025	BNI CorpU TV Knowledge Supplement: "Decision-Making Based on the Business Judgment Rule in Good Corporate Governance and Anti-Corruption"	106
316	September 16, 2025	BNI Promotes Sustainability and the People's Economy Through Eco-Friendly Batik Mentoring	82

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317	September 17, 2025	UPZ BAZNAS BNI Wins Five Awards from BAZNAS RI	76
318	September 17, 2025	BAZNAS RI Awards Lifetime Achievement to the Late Andan Kesuma	76
319	September 17, 2025	BNI Reminds the Public to Beware of Fake Job Vacancies	80
320	September 18, 2025	BNI Strengthens Integrity and GCG Through a Compliance Forum with the KPK	89
321	September 18, 2025	Watch the Grand Final Pitching of BINNOVA Batch 5 – 2024 "Operations Excellence"	91
323	September 18, 2025	BNI Receives the Highest Rating for GCG Implementation at "The 16th IICD CG Conference & Award 2025"	131
324	September 19, 2025	BNI Introduces the Simponi Feature in wondr by BNI to Simplify Pension Fund Management	147
325	September 23, 2025	BNI CorpU TV Knowledge Supplement: Smart Parent, Smart Future, with BNI Life Smart Solutions	115
326	September 25, 2025	BNI CorpU TV Knowledge Supplement: Strategies to Address International Trade Remedies	100
327	September 27, 2025	BNI Strengthens ESG Commitment Through Orangutan Conservation and Forest Rehabilitation	91
328	September 27, 2025	BNI Opens the Emerald Center at PIM 1, Strengthening Wealth Management Services	91
329	September 29, 2025	5,000 Runners Enliven the wondr ITB Ultra Marathon 2025, with 32 Professors Participating	65
330	September 29, 2025	BNI Promotes Transparency Through Education on the International Right to Know Day	68
331	September 29, 2025	wondr ITB Ultra Marathon Closes Festively, BNI–ITB Strengthen Collaboration for Education	82
332	September 30, 2025	BNI Socializes Housing Credit Programs in Banten to Support the 3 Million Homes Target	75
333	September 30, 2025	wondr ITB Ultra Marathon Closes Festively, BNI–ITB Strengthen Collaboration for Education	103
334	October 3, 2025	BNI Strengthens the People's Economy and Environmental Sustainability in Ponggok Village	75
335	October 5, 2025	BNI Xpora Wins SME Development Program of the Year Award, Driving MSMEs to Enter International Markets	68
336	October 6, 2025	BNI CorpU TV Knowledge Supplement: Sales Excellence Webinar Series "Consultative Selling: The Art of Selling Without Appearing to Sell"	63
337	October 6, 2025	BNI Partners with Developers in Serang to Accelerate the 3 Million Homes Program	119
338	October 11, 2025	BNI Supports Expansion of Cross-Border QRIS to Maintain Rupiah Stability	42
339	October 11, 2025	BNI Strengthens Digital Business Literacy Through BNIdirect at the Investor Daily Summit 2025	82
340	October 14, 2025	BNI Dominates the Financial Services Basketball League 2025: Men's Team Champions, Women's Team Runner-Up	31
341	October 14, 2025	BNI Supports BPJS Ketenagakerjaan to Enhance Social Security Services via BNIdirect Cash	44
342	October 16, 2025	BNI CorpU TV Knowledge Supplement: Webinar "Leading Business: The Future of Banking – Artificial Intelligence & Blockchain Innovation"	55
343	October 17, 2025	Happy Birthday to the President of the Republic of Indonesia	50
344	October 17, 2025	BNI Supports the Development and Operation of a 500 MW Geothermal Power Plant Owned by PT Geo Dipa Energi (Persero)	44
345	October 17, 2025	BNI Wins the IDX Channel Anugerah Inovasi Indonesia 2025 for Sustainable Financial Innovation	75
346	October 20, 2025	BNI Wins the Green Warrior Award at the ESG Now Awards 2025	28
347	October 20, 2025	BNI Delivers Literacy and Modern Transaction Experiences at TNI RUN 2025	28
348	October 20, 2025	BNI CorpU TV Knowledge Supplement: Sales Excellence Webinar Series "From Seller to Trusted Advisor: Building Long-Term Customer Relationships"	48
349	October 22, 2025	Malang Animation Studio Penetrates Global Markets with Financing Support from BNI	47
350	October 22, 2025	BNI Successfully Conducts the National Mass Signing, Driving MSME Financing and Job Creation	46
351	October 23, 2025	Local MSMEs Enliven wondr by BNI Indonesia Masters 2025 in Medan	46
352	October 24, 2025	27,300 Runners Enliven the wondr Jakarta Running Festival 2025, Showcasing BNI's Collaboration to Drive National Sports Tourism	47
353	October 24, 2025	BNI Records Solid Fundamental Performance in Q3 2025, Digitalization and CASA Become Growth Engines	42

No.	Date	Headline	Number of Accesses/ Downloads
354	October 24, 2025	BNI and the National Land Bank Agency Strengthen Strategic Collaboration to Accelerate National Development	40
355	October 25, 2025	wondr JRF 2025 Officially Kicks Off, BNI Invites 27,300 Runners to Drive the Economy and Protect the Environment	47
356	October 27, 2025	Synergy Between BNI and Subsidiaries Strengthens MSME Competitiveness at the wondr JRF Expo 2025	53
357	October 28, 2025	BNI CorpU TV Knowledge Supplement: SPECIAL AGEN46 WEBINAR "Buy BNI Life Pandai+ Insurance at Agen46: Affordable Premiums, Powerful Benefits"	45
358	October 29, 2025	Fajar/Fikri Finish Runner-Up at the 2025 French Open, BNI Proud to Support Indonesian Athletes on the Global Stage	60
359	October 29, 2025	Supporting the 3 Million Homes Program, BNI Disburses 109,000 Subsidized Home Loans	67
360	October 30, 2025	BNI Strengthens Financial Inclusion and Digital Transactions Through FinExpo 2025	85
361	October 31, 2025	Indonesia Dominates the wondr by BNI Indonesia Masters 2025, Reinforcing BNI's Commitment to Supporting Badminton Athlete Regeneration	54
362	October 31, 2025	BNI Supports the Expansion of Indonesian Diaspora Restaurants in the Netherlands Through the Diaspora Loan Program	105
363	November 3, 2025	BNI and ITS Promote Digital Education Philanthropy Through the ITS Endowment Fund	82
364	November 11, 2025	BNI CorpU TV Knowledge Supplement: Sales Excellence Webinar Series "Active Acquisition: Winning Strategies to Capture New Customer Potential"	75
365	November 5, 2025	BNI Wins an Award for Its Contribution to MSME Empowerment and Inclusive Village Finance	59
366	November 6, 2025	BNI Hi-Movers Spread Kindness: 20,000 Beneficiaries Experience the Impact of BAMUIS and UPZ BAZNAS BNI Synergy	59
367	November 7, 2025	3,000 Runners Enliven the wondr Surabaya ITS Run 2025, BNI Drives Local Economy and a Digitally Healthy Lifestyle	58
368	November 7, 2025	BNI Supports the National Film Industry Through Collaboration with Iko Uwais in the Film TIMUR	72
369	November 10, 2025	BNI Proudly Supports Putri Kusuma Wardani's Achievement at the 2025 Hylo Open	68
370	November 12, 2025	BNI Supports National Food Security Through Participation in Agrinex Expo 2025	41
371	November 12, 2025	BNI Encourages MSMEs to Move Up the Value Chain, Creating Economic Heroes from Ngawi	41
372	November 12, 2025	BNI CorpU TV Knowledge Supplement: Wholesale Webinar Series "Socialization of Standard Pricing, Sales Cue Cards, and Standard Product Decks"	59
373	November 13, 2025	BNI Disburses IDR40.7 Billion in Housing Program Loans to Support MSMEs and the Real Sector	46
374	November 14, 2025	BNI Wins the Leadership AA Award at the Indonesia ESG Leadership Awards 2025	43
375	November 14, 2025	BNI Supports the Revival of the Creative Ecosystem Through ICCF 2025 in Greater Malang	46
376	November 14, 2025	BNI Wins the Women in SDG's Action 2025 Award, Demonstrating a Strong Commitment to Poverty Alleviation	48
377	November 14, 2025	BNI Wins Two Awards at ICXA 2025 for Digital Innovation and Service Transformation	96
378	November 17, 2025	BNI Holds Shopping Race Phase 3 in 13 Major Cities, Driving Digital Literacy and Transactions	55
379	November 18, 2025	Gregoria Secures a Hat-Trick Podium Finish at the Kumamoto Masters Japan, BNI Supports Indonesian Athletes on the Global Stage	42
380	November 18, 2025	BNI Strengthens Public Housing Financing, Driving a Modern Housing Ecosystem in Central Java	54
381	November 18, 2025	BNI CorpU TV Knowledge Supplement: Sales Excellence Webinar Series "Sales Execution Mastery: Discipline, Militancy, and Completion in Selling"	40
382	November 18, 2025	SP BNI National Working Meeting Formulates a Strategic Agenda for Sustainable Performance	46
383	November 19, 2025	BNI CorpU TV Knowledge Supplement: Webinar & Zoominar Xpora Series "Unlocking Opportunities: Expanding Export Reach to Saudi Arabia with Xpora & ITPC Jeddah"	30
384	November 20, 2025	BNI Launches Indonesia's First ESG Advisory Playbook, Accelerating Green Transformation in the Palm Oil Industry	20
385	November 20, 2025	BNI Supports the Revival of the Creative Ecosystem Through ICCF 2025 in Greater Malang	18

No.	Date	Headline	Number of Accesses/ Downloads
386	November 20, 2025	BNI CorpU TV Knowledge Supplement: Webinar "9 Wondrs – Essential Soft Competencies for BNI Hi-Movers"	76
387	November 24, 2025	BNI Drives World-Class Achievement as Indonesia Hosts Two All-Indonesian Finals at the 2025 Australian Open	18
388	November 24, 2025	Indonesia's Young Athletes Harvest Titles at the 2025 Australian Open International Tournament	21
389	November 25, 2025	BNI CorpU TV Knowledge Supplement: Mandatory Taxation Program Webinar Series "Preparation and Guidance for Filing Individual Annual Tax Returns for Fiscal Year 2025 via DJP Coretax"	40
390	November 25, 2025	Raymond/Joaquin Make a Brilliant Debut at the BWF Super 500 Level	44
391	November 26, 2025	Strengthening the Local Economy, BNI Champions MSMEs at the Yogyakarta International Tournament	45
392	November 26, 2025	BNI CorpU TV Knowledge Supplement: LinkGoals Episode 2 "LinkedIn Deep Dive"	32
393	November 26, 2025	BNI Provides Exclusive Access to the wondr BrightUp Cup 2025 Through Buy 1 Get 2 Offers	52
394	November 27, 2025	29 Years of YKP BNI: From Service to Sustainable Transformation	23
395	November 28, 2025	BNI Wins the Digital Transformation Driver Award 2025 for Innovation with wondr by BNI	60
396	December 1, 2025	BNI Wins the Environment & Sustainability Award, Strengthening Its Position as a Driver of Sustainable Finance	55
397	December 1, 2025	BNI Xpora Strengthens the Capacity of Gorontalo MSMEs to Move Up the Value Chain and Penetrate Export Markets	58
398	December 2, 2025	Time to Hunt for Deals at the wondrful Dwidayatour Fest 2025	56
399	December 3, 2025	BNI CorpU TV Knowledge Supplement: BNI INSPIRING TALK BOC/BOD SERIES "Roots, Values, and the Life Journey of a Guardian of Integrity"	62
400	December 4, 2025	BNI Disburses Emergency Relief for Disaster Victims in West Sumatra, Monitoring and Support Continue	37
401	December 4, 2025	BNI Hi-Movers, Use Social Media Wisely	31
402	December 4, 2025	BNI Wins Two BI Awards 2025, Strengthening Its Role in National Financial System Stability	38
403	December 5, 2025	BNI CorpU TV Knowledge Supplement: Part 2 — BNI INSPIRING TALK BOC/BOD SERIES "So This Is How to Read People! The Rarely Known Art of Verification"	33
404	December 5, 2025	TIMUR Officially Premieres, BNI Brings a Fresh Boost to the National Action Film Industry with Iko Uwais	45
405	December 8, 2025	"Symphony of Integrity: Collaboration, Innovation, and Expression to Prevent Corruption"	76
406	December 8, 2025	Jojo–Ginting Invite Audiences to Enjoy Badminton Together at the wondr BrightUp Cup 2025	66
407	December 8, 2025	Jojo–Ginting Invite Audiences to Enjoy Badminton Together at the wondr BrightUp Cup 2025	61
408	December 9, 2025	BNI CorpU TV Knowledge Supplement: Part 3 — BNI INSPIRING TALK BOC/BOD SERIES "Key Lessons: Empathy, Leadership, and Transformation"	49
409	December 9, 2025	BNI Expands Emergency Relief Assistance for Disaster Victims in Sumatra	45
410	December 10, 2025	BNI Promotes Financial Literacy and MSME Advancement Through Participation in NFHE 2025	99
411	December 10, 2025	BNI Wins Two ARA 2024 Awards, Reinforcing Its Commitment to Governance	86
412	December 12, 2025	Commitment to Preventing Corruption: Munadi Herlambang Represents BNI and Wins The Most Trusted Company at the CGPI Award 2025	71
413	December 12, 2025	Newsletter WDC — Volume 21 Issue: November 2025	56
414	December 15, 2025	BNI Hi-Movers, Let's Show the Spirit of Serving with All Our Heart!	62
415	December 15, 2025	BNI Supports the Creative Industry, Community Screenings of TIMUR Film Enthusiastically Welcomed Across Cities	80
416	December 15, 2025	BNI Supports Sean Gelael at the Start of the 2026 Racing Season Through the Asian Le Mans Series	77
417	December 16, 2025	BNI Holds an Extraordinary General Meeting of Shareholders (EGMS), Strengthening Transformation and Governance Ahead of 2026	65
418	December 17, 2025	Srikandi BNI Talkshow — Women in Celebration Week 2025	80

No.	Date	Headline	Number of Accesses/ Downloads
419	December 18, 2025	BNI Wins Two International Awards for Human Capital Development	75
420	December 18, 2025	BNI CorpU TV Knowledge Supplement: Leadership Accelerator Essentials Webinar — "Elevating Business Performance Through Market Expansion"	40
421	December 19, 2025	BNI Volunteers Join the BUMN Peduli Action, Supporting Recovery for Disaster-Affected Communities in Aceh	28
422	December 20, 2025	BNI Strengthens Social Care Through the Christmas 2025 Program, Driving Tangible Impact for Communities	39
423	December 22, 2025	BNI Reaches Aceh, Distributing School Uniforms and Providing Trauma Healing Facilities	32
424	December 22, 2025	BNI Together with BUMN Peduli Provides Rapid, Tangible Assistance for Disaster-Affected Communities in Sumatra	49
425	December 22, 2025	Reflection on National Mother's Day: Serving with All Our Heart Together with BNI	44
426	December 22, 2025	Upholding Integrity and Realizing Good Corporate Governance	63
427	December 23, 2025	Shopping Gets Lighter, Rewards Get Bigger with wondr by BNI!	62
428	December 24, 2025	BNI Provides Trauma Healing for Children Affected by Floods in Southeast Aceh	57
429	December 24, 2025	BNI Prepares IDR19.51 Trillion in Cash Ahead of the Christmas and New Year Holidays	44
430	December 24, 2025	BNI Reaffirms Its Status as an Informative Public Institution for Three Consecutive Years	55
431	December 24, 2025	Srikandi BNI Emphasizes the Strategic Role of Women in BNI's Transformation and Competitiveness	50
432	December 25, 2025	A Meaningful Christmas, Welcoming the New Year with Shared Hope	65
433	December 25, 2025	Comfortable Holidays, Secure Transactions: Avoid Cyber Attacks	69
434	December 29, 2025	BNI Namaed a Strategic Partner for Digital Campuses at the Diktisaintek Awards 2025	77
435	December 29, 2025	Beware of Fake Christmas Greetings: BNI Urges Customers Not to Click Links Carelessly	45
436	December 30, 2025	BNI Prepares Credit Relaxation for Debtors Affected by Disasters in Sumatra	34
437	December 30, 2025	BNI Establishes Health Posts to Support Recovery for Flash Flood Victims in Aceh	29
438	December 31, 2025	BNI Hi-Movers, Let's Watch the CNBC Power Talk Lunch with Director of Operations, Mr. Ronny Vennir	40

PUBLIC INFORMATION DISCLOSURE

BNI consistently ensures that stakeholders have access to relevant, easily accessible, and transparent information. BNI provides accurate information through its official website, the development of standardized operating procedures, and the integration of digital service features that further facilitate customer access. These efforts are complemented by enhancements to offline services to ensure equal access to information for communities across various regions.

In line with its role in advancing national financial literacy, BNI also empowers Agen46 as a strategic partner in disseminating information more broadly, enabling outreach to communities in remote areas. In every aspect of information disclosure, BNI upholds the principles of transparency and accountability through the role of the Information and Documentation Management Officer (PPID), who serves public information needs optimally. This approach further underscores BNI's consistency in implementing good corporate governance practices and in building public trust in the Bank.

Governance Framework, Management, and Control of Tax Aspects

BNI recognizes that compliance with tax regulations is a critical aspect of the implementation of good corporate governance. Tax compliance represents BNI's responsibility and contribution in supporting the sustainability of state finances. In its implementation, BNI consistently fulfills its tax obligations, both as a corporate taxpayer and as a withholding agent, in accordance with applicable laws and regulations. BNI also ensures that all documents related to tax obligations, including annual and monthly tax returns (SPT), are submitted accurately and in a timely manner to the relevant authorities.

In order to maintain the quality of implementing good tax governance, BNI has an adequate governance framework, starting from implementing clear tax policies and procedures and including guidelines regarding tax reporting, fulfilling tax obligations, and managing tax risks. In implementing the management of tax obligations and monitoring and controlling taxes, BNI has established a comprehensive and structured process, such as:

1. Instilling a tax approach in the Bank through Tax Company Guidelines and collaboration with tax application service providers for deposit and reporting systems that are directly connected to the tax authorities. BNI also increases tax awareness through training and socialization.
2. Identify, manage, and monitor tax risks by carrying out continuous monitoring and reconciliation.

BNI leverages an integrated tax information technology system to enhance the efficiency and accuracy of financial information management. Through this system, tax recording and reporting processes are carried out consistently in accordance with applicable regulations. The utilization of digitalization also enables the Bank to ensure compliance with tax regulations and to minimize the risk of administrative sanctions, such as fines, interest, or criminal penalties, arising from errors or delays in reporting.

In addition to complying with Indonesian tax laws and regulations, the fulfillment of BNI's tax obligations is also conducted in accordance with the tax jurisdictions applicable to each of its overseas network offices, including Overseas Branches in Singapore, Hong Kong, Tokyo, London, New York, and Seoul, the Osaka Sub Branch and the Singapore Remittance Center, as well as Representative Offices in Amsterdam and Sydney.

Further discussion regarding the fulfillment of BNI's tax obligations is presented in detail in the chapter on BNI's Contribution to National Development.

Anti-Money Laundering Program, Counter Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction (APU, PPT, and PPPSPM)

Money Laundering (TPPU), Terrorism Financing (TPPT), and the Prevention and Eradication of Terrorism Financing (PPSPM) are international crimes that pose serious threats to state stability, including in Indonesia. Globalization and advances in information technology have enabled perpetrators to develop increasingly diverse and cross-jurisdictional modi operandi. These illegal activities not only exploit the Financial Services System (SJK) but have also expanded to institutions outside the financial system.

To prevent the misuse of the banking system by irresponsible parties, and in compliance with Article 4 of POJK Number 8 of 2023 concerning the Implementation of Anti-Money Laundering Programs, Counter Terrorism Financing, and Prevention of Funding for the Proliferation of Weapons of Mass Destruction in the Financial Services Sector (POJK APU, PPT, and PPPSPM), BNI, as a Financial Services Provider (PJK), is required to identify, assess, and understand the risks of TPPU/TPPT/PPSPM regarding customers, countries or geographical areas, products, services, transactions, or distribution networks at its institution on an individual basis. This process considers all relevant risk factors and adequate risk mitigation levels to ensure that existing risks are effectively mitigated. It serves as a guide for refining provisions, improving program implementation, and setting priorities for resource allocation in areas with higher TPPU/TPPT/PPSPM risk levels.

Furthermore, oversight of the APU, PPT, and PPPSPM programs has been expanded through the presence of Regional AML-CFT Officers (RAMLO) in all regional offices. RAMLO is responsible for conducting training, socialization, and implementing APU, PPT, and PPPSPM policies across all Regional Offices/ Branches/Centers under their management. They also monitor and analyze indications of suspicious financial transactions, serve as a point of contact for compliance consultation/advice/reviews, and act as a liaison with regulators.

APU, PPT, and PPPSPM Policies and Procedures

To strengthen the risk culture through the implementation of the APU, PPT, and PPPSPM Programs, BNI has specifically designed policies and procedures stipulated through the Approval of the Board of Directors and the Board of Commissioners. The preparation of these internal guidelines and policies considers both the Bank's business needs and alignment with relevant laws and regulations. Broadly, BNI's APU, PPT, and PPPSPM implementation policies are based on the 5 (five) main pillars mandated by POJK No. 8 of 2023:

1. Active supervision of the Board of Directors and Board of Commissioners;
2. Policies and Procedures;
3. Internal Control;
4. Management Information System; and
5. Human Resources and Training.

APU, PPT, and PPPSPM Organizational Structure

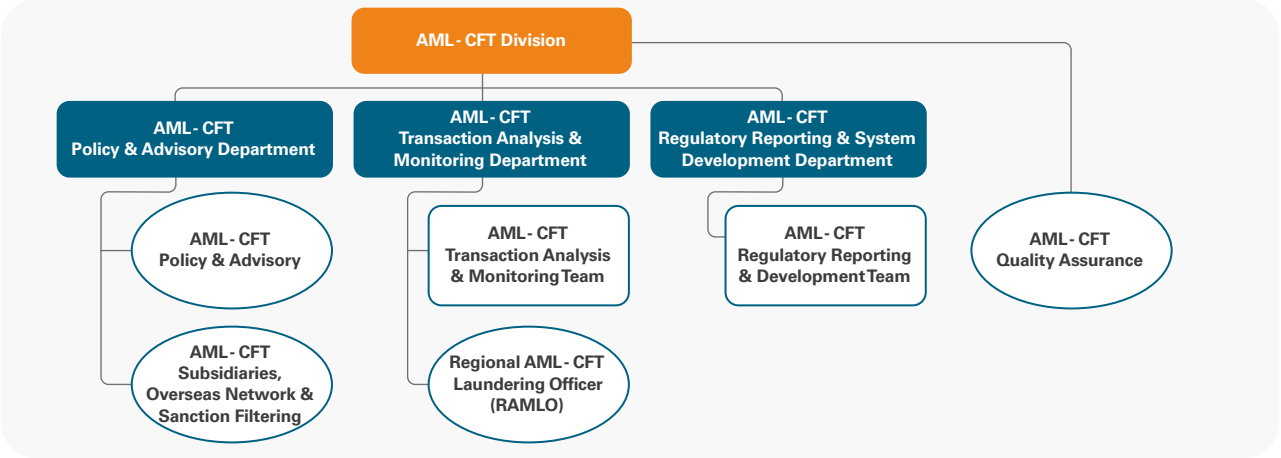
As part of the compliance management framework for the implementation of the APU, PPT, and PPPSPM programs, BNI has designated the AML-CFT Division as the Special Work Unit (UKK), responsible for formulating strategies and periodically monitoring the implementation of the APU, PPT, and PPPSPM programs.

Based on the BNI Board of Directors' Organizational Restructuring stipulated in the Board of Directors' Decree No. KP/377/DIR/R dated August 1, 2025, concerning the BNI Board of Directors' Organizational Restructuring, one of the decisions was the restructuring of the Anti-Money Laundering – Counter Financing of Terrorism management function into a standalone unit at the Division level.

Effective September 15, 2025, the management of APU, PPT, and PPPSPM implementation, which was originally under the Compliance Division, will become the responsibility of the AML-CFT Division as a unit under the direct supervision of the Director of Human Capital & Compliance. consisting of the Policy & Advisory Department, which manages policies, strategic advice, and compliance supervision across all organizational lines and subsidiaries. Furthermore, the Analysis &Transaction Monitoring Department focuses on identifying and analyzing suspicious transactions, while the Regulatory Reporting & System Development Department ensures the accuracy of regular reporting and the effectiveness of monitoring systems, and the Quality Assurance function acts in conducting reviews of APU, PPT, and PPPSPM advisory, spot checks, and reporting evaluations, providing recommendations for process improvements, and preparing Quality Assurance reports for management.

To strengthen program oversight, the Bank assigns Regional Anti-Money Laundering Officers (RAMLO) at each Regional Office. In practice, RAMLO under the direct supervision of the Analysis & Transaction Monitoring Department is required to submit periodic reports regarding the implementation of APU, PPT, and PPPSPM.

The Organizational Structure of the AML-CFT Division according to the Board of Directors' Decree No. KP/441/DIR/R dated September 4, 2025, and Memo No. CDV/2/756/R dated October 16, 2025 is as follows:



APU, PPT, and PPPSPM Profile



Rahmawati
Pemimpin Divisi AML- CFT

Age
55 years old as of December 31, 2025

Nationality
Indonesian Citizen

Domicile
Jakarta, Indonesia

Riwayat Pendidikan
- Sarjana Hukum dari Fakultas Hukum, Universitas Indonesia (1993)
- Magister Hukum dari Pasca Sarjana, Universitas Indonesia (2003)

Legal Basis for Appointment
Appointed as Head of AML-CFT Division based on Board of Directors Decree No. KP/382/DIR/R dated August 5, 2025.

Term of Office
September 15, 2025 - present

Professional Certification and/or Training
- Certified Anti Money Laundering Specialist (CAMS)
- Bank Staff & Management School (Sespibank)
- Certified Bank Manager (CBM) from the Indonesian Bankers Association
- Senior Managers and Certification Regime (SMCR)
- Risk Management Certification (SMR) Level 6
- Developer of APU PPT & PPPSPM Competency Certification Level 6
- General Banking Certification Level 3
- Professional Advocate Training Program (PERADI/PKPA)
- Integrity Builder Expert Certification (API)

Work Experience
- Anti-Money Laundering Group Leader in the Compliance Division (2008-2014)
- Vice President in Compliance Division (2014-2023)
- Head of AML & Counter Terrorism Financing Department in Compliance Division (2023–2025)
- Head of AML-CFT Division (2025 - Present)

Concurrent Positions
No concurrent positions at BNI or other companies/institutions.

Affiliations
Has no affiliations with members of the Board of Directors, Board of Commissioners, or Major/Controlling Shareholders.

Duties and Responsibilities of APU, PPT, and PPPSPM

Duties and responsibilities of the BNI UKK Head Office, cq. The AML-CFT Division regarding the implementation of the APU, PPT, and PPPSPM Programs are:

1. Develop and manage policies and guidelines for implementing the Principles of Recognizing Service Users (PMPJ)/Know Your Customer (KYC), Anti-Money Laundering (APU) Programs, Counter Terrorism Financing (PPT), and PPPSPM at BNI.
2. Provide compliance opinions/advice regarding the implementation of PMPJ and APU, PPT, and PPPSPM.
3. Develop and ensure the adequacy of systems and mechanisms that support PMPJ and APU, PPT, and PPPSPM.
4. Conduct socialization regarding PMPJ and APU, PPT, and PPPSPM provisions.
5. Building awareness of understanding of APU, PPT, and PPPSPM to all lines of the BNI organization.
6. Identify and analyze transactions that meet suspicious criteria based on financial transaction analysis reports from related work units and/or based on the results of monitoring carried out based on the system.
7. Manage the preparation and submission of Suspicious Financial Transaction Reports (LTKM), Cash Financial Transaction Reports (LTKT), Transaction Reports to and from Overseas (LTKL), SIPESAT Reports, Information System Reports for Suspected Terrorism Financing (SIPENDAR), and other reports in accordance with the criteria set out in the provisions applicable to PPATK.
8. Monitor and supervise the implementation of APU, PPT, and PPPSPM in all domestic branches, Overseas Offices, and related Units/Divisions.
9. Carry out the integrated governance function (integrated APU, PPT, and PPPSPM).

Implementation of the APU, PPT, and PPPSPM Programs in 2025

In 2025, BNI has implemented various sustainable initiatives and improvement efforts to strengthen the realization of the APU, PPT, and PPPSPM programs, including the following:

1. Bank Risk assessment of TPPU, TPPT and/or PPSPM using a regular risk-based approach (RBA) that is periodically reviewed;
2. Active Supervision of the Board of Directors and the Board of Commissioners through:
   a. Approval of the designation of the AML-CFT Division as a Special Work Unit (UKK);
   b. Approval and evaluation of the APU, PPT, and PPPSPM Policies, Procedures, and Programs;
   c. Periodic reports regarding the implementation of the APU, PPT, and PPPSPM Programs;
   d. Board of Directors approval of the Plan and Realization Report on Updating Customer Data; and
   e. Discussion in Board of Directors and Board of Commissioners meetings regarding the APU, PPT, and PPPSPM Program.
3. Policies and Procedures prepared by the AML-CFT Division are periodically reviewed/updated/improved in accordance with applicable regulations. To strengthen the implementation of the APU, PPT, and PPPSPM programs, procedures for each banking product and activity are also regulated in procedures for implementing APU, PPT, and PPPSPM, in order to identify and assess the risk of money laundering crimes and/or terrorist financing crimes for each product and activity.
4. To ensure that the implementation of the APU, PPT, and PPPSPM programs is running as it should, supervision is carried out by the AML-CFT Division.
5. Effective and independent internal control in the implementation of APU, PPT, and PPPSPM is carried out by: having adequate APU, PPT, and PPPSPM policies and procedures as well as internal monitoring (supervision), clear limits of authority and responsibility through the Three Lines of Defense, independent inspections by the Internal Audit Unit to ensure the effectiveness of program implementation, following up on all internal and external audit results, and improving the quality of customer data and reporting analysis to regulators in accordance with regulations.
6. Information Management System to optimize transaction monitoring in the implementation of the APU, PPT, and PPPSPM Program, BNI has been continuously developing information system technology.
7. From the Human Capital and Training aspect, BNI conducts training, socialization, and reminders regarding the implementation of the APU, PPT, and PPPSPM Programs to officials and/or for all employees continuously to increase awareness and competency.
8. Implementing programs to improve the quality of customer data by applying the Completeness, Consistency, and Composite methods to strengthen the Single Source of Truth (SSOT) aspect.

9. Establish and foster active cooperation and coordination with regulators and Law Enforcement Officials, especially in fulfilling requests for customer data and/or information as well as providing information in efforts to prevent and eradicate the crime of money laundering, preventing the financing of terrorism and preventing the financing of the proliferation of weapons of mass destruction.
10. Implementation of evaluation and monitoring of the APU, PPT, and PPPSPM program implementation in Subsidiaries and Overseas Offices. This is a form of responsibility for the Bank, which has office networks both at home and abroad as well as within the framework of the BNI Financial Conglomeration to ensure effective implementation.
11. Playing an active role in work programs or activities organized by regulators, as follows:
    a. Developing joint training programs with the Human Capital & Compliance Director Communication Forum (FKDKP) related to APU, PPT, and PPPSPM for the banking industry to ensure a same playing field/common understanding in the implementation of provisions.
    b. Coordinating in the implementation of the 23rd Anniversary of the National Movement of APU PPT Indonesia ("Gernas 23") with the theme: "Real Commitment, Strong Synergy for Golden Indonesia 2045."
    c. Involved in PPATK's Public Private Partnership (PPP) for investment fraud typologies and acting as a co-leader in the PPP team for Green Financial Crime (GFC) typologies.
    d. Conducting education and providing financial literacy to internal and external parties regarding awareness of account buying and selling practices in order to contribute to the eradication of online gambling.
    e. Conducting monitoring (cyber patrol) of online gambling websites that use BNI accounts.
    f. Participating in the preparation of the APU, PPT, and PPPSPM Certification Module based on OJK's SKKNI, together with FKDKP.
    g. Playing an active role in conducting thematic transaction monitoring in accordance with parameters set by PPATK.
    h. Playing an active role in the 2025 National Risk Assessment (NRA) survey activity organized by PPATK, as a form of support for efforts to strengthen money laundering and terrorism financing risk mapping at the national level.

Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF)

The Financial Integrity Rating on Money Laundering and Terrorist Financing (FIR on ML/TF) is an assessment by the Indonesian Financial Transaction Reports and Analysis Center (PPATK) on the integrity and effectiveness of reporting parties in implementing the APU, PPT, and PPPSPM programs, covering aspects of commitment, implementation, and compliance. In 2025, BNI successfully achieved an FIR on ML/TF score of 9.43 with a "Very Good" category.

APU, PPT, & PPPSPM Work Plan for 2026

In 2026, BNI has established a work plan to support the implementation of the APU, PPT, and PPPSPM Programs with the following strategic priorities:

1. Improving Stakeholder satisfaction survey results by enhancing the quality of outputs.
2. Increasing employee awareness regarding compliance with the implementation of the APU, PPT, and PPPSPM program.
3. Refining systems and applications that support the implementation of the APU, PPT, and PPPSPM program.
4. Playing an active role in refining the APU, PPT, and PPPSPM systems in Overseas Offices and Subsidiaries.
5. Developing AML Index tools and refining the AML Index for Branch Offices and Subsidiaries.
6. Developing Human Resources capabilities related to the implementation of the APU, PPT, and PPPSPM program for all BNI employees, including those related to International Regulations through training, socialization, webinars, and other initiatives.

Anti-Corruption Policy

BNI has established an Anti-Corruption Policy that serves as a fundamental framework for maintaining integrity across all business activities. This policy is designed to prevent, detect, and take action against any violations related to corruption, collusion, and nepotism (KKN) within the Bank, whether committed by employees, business partners, or third parties associated with BNI.

In its implementation, BNI is committed to instilling a culture of anti-corruption and anti-bribery by ensuring that all BNI employees understand and comply with business ethics and the company's code of conduct. The bank also strengthens internal supervision through a secure and independent reporting mechanism (whistleblowing system), so that any indications of violations can be followed up objectively and transparently.

Programs and Procedures to Address Corruption, Fraud, Bribery, Gratification, and/or Kickbacks [ACGS B.4.5]

To prevent corruption, fraud, bribery, and gratification practices within the Bank, BNI has developed several programs, including:

1. Establishment of a Gratification Control Unit (UPG) and implementation of an Anti-Bribery Management System (SMAP) as the driving force for anti-corruption initiatives at BNI. Policies related to gratification and bribery are further elaborated in the Anti-Gratification and Anti-Bribery Policy sections.
2. Strict sanctions, including termination of employment, are imposed for violations involving gratification, bribery, or fraud, as a deterrent and to uphold corporate integrity.
3. To enhance anti-fraud awareness, BNI regularly conducts Anti-Fraud Awareness Programs for all BNI employees and subsidiaries through webinars, outreach activities, and campaigns across BNI's official social media channels.
4. BNI also provides appreciation to employees who contribute to fraud-prevention efforts, as acknowledgement of their role in maintaining a clean and ethical work environment.

These initiatives reinforce BNI's commitment to fostering a workplace free from corruption, fraud, bribery, and gratification.

Anti-Corruption Training and Awareness for Employees

BNI ensures that the work culture embedded within BNI is free from corruption, gratification, and bribery. BNI consistently involves all employees in various training programs to strengthen their understanding and commitment to anti-corruption programs.

In addition, BNI successfully increased employee participation in the following initiatives during 2025:

1. Mandatory e-Learning program on Gratification Control and SMAP through BNI Smarter, which has been attended by 30,013 employees.
2. Socialization and awareness raising on anti-fraud and anti-gratification to all employees, both new and existing, as well as other stakeholders.
3. Appeal to all employees not to accept or request rewards from third parties, and to sign an Integrity Pact that informs BNI's commitment to gratification control.
4. Dissemination of information through posters, videos, digital banners, videotrons, the BNI website, national mass media, digiHC, and the BNI Forum related to anti-gratification and SMAP, as well as guidelines for preventing corruption.
5. Holding a Compliance Forum with the theme "Decision Making based on the Business Judgment Rule in the Context of Good Corporate Governance and Anti-Corruption," which invited speakers from the Corruption Eradication Commission (KPK) and was attended by the entire Board of Directors, Board of Commissioners, SEVP, Directors and Board of Commissioners of Subsidiary Companies, Division and Regional Leaders, Anti-Corruption Counselors (PAKSI), Integrity Builders (API), and all BNI employees.
6. Participating in the Integrity Assessment Survey (Survei Penilaian Integritas/SPI) organized by the Corruption Eradication Commission (Komisi Pemberantasan Korupsi/KPK), involving a wide range of internal and external respondents, including employees, business partners, service users, and other Company stakeholders.

Anti-Gratification & Anti-Bribery Policy

Any form of fraudulent practice has the potential to cause a negative impact on the Bank's business ecosystem and damage the Bank's integrity. Therefore, BNI takes firm action against any violations related to fraudulent acts and continues to strengthen preventive measures through the implementation of a Gratification Control Policy that must be complied with by all employees. Every acceptance or rejection of gratification must be reported via the Gratification Online (GOL) application transparently and in accordance with the procedures.

Through the comprehensive and continuous implementation of this policy, BNI is committed to maintaining the trust of shareholders, stakeholders, and the wider community in the Bank's integrity, credibility, and reputation as a professional financial institution committed to the principles of Good Corporate Governance (GCG).

In addition to having adequate control policy tools, the Bank also strives to build a healthy and clean work culture through obtaining SNI ISO 37001:2016 certification - Anti-Bribery Management System (SMAP) in the scope of Procurement of Goods and Services, which is then expanded to cover the scope of the Corporate Credit Segment and BNI Pension Fund Activities. In 2025, the second surveillance audit was conducted, which demonstrated that the implementation of the Anti-Bribery Management System (SMAP) at BNI was assessed as consistent, with no material deviations identified.

ANTI-GRATIFICATION AND ANTI-BRIBERY POLICY PROGRAMS AND PROCEDURES

In order to overcome corrupt practices, kickbacks, fraud, bribery, and/or gratification, all BNI levels are required to implement anti-bribery and anti-gratification programs and procedures as stated in the Gratification Control Guidelines No. IN/726/KPN/002 dated September 24, 2021 and the Anti-Bribery Management System (SMAP) Company Guidelines No. IN/118/CMP/006 dated December 27, 2024. The preparation of these policies and guidelines has been aligned with the provisions of Law No. 20 of 2001, which is an amendment to Law No. 31 of 1999 concerning the Eradication of Corruption Crimes, and OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions.

BNI takes various strategic steps through the implementation of a number of written guidelines and provisions related to preventing corruption and controlling gratification. This step reflects BNI's commitment to instilling values of integrity across all levels of the organization, while ensuring that every employee understands and implements the principles of ethics, transparency, and accountability in every Bank operational activity. The following are several policies related to corruption prevention and gratification control:

A. Gratification Control Policy

Gratification Control Policy stipulates, among other things, that:

1. Gratification control is the duty and responsibility of all BNI personnel.
2. Prohibition of accepting or giving gratuities that are indicated as bribery, namely:
   a. All BNI personnel are prohibited from accepting gratuities that are indicated as bribery, whether in the form of money and/or goods and/or gifts, and are required to refuse the gift at the first opportunity by informing them of the gratification control provisions at BNI. Receipt of gratuities includes those received directly or those transferred via account or other means.
   b. Upon receipt of gratuities that are forced to be accepted, all BNI personnel must immediately report at the first opportunity to the Corruption Eradication Commission through the Gratification Control Unit (UPG).
   c. All BNI personnel are prohibited from giving money and/or gratuities and/or gifts related to their position and contrary to their obligations or duties to civil servants and state administrators.
3. Obligation to submit gratification reports:
   a. All BNI personnel are required to make a report regarding rejection or acceptance of gratification.

b. Recipients who have submitted a gratification report are free from the threat of criminal acts of bribery as regulated in Law No. 31 of 1999 as amended by Law No. 20 of 2001 concerning the Eradication of Corruption Crimes.

B. Bribery Control Policy

BNI's Anti-Bribery Control Policy stipulates, among other things, that:

1. Maintain Integrity, Professionalism, Banker Ethics, Transparency, Honesty, Consistency and always adhere to the Law and all applicable regulations as well as the Work Culture Values of companies and State-Owned Enterprises.
2. Must refuse giving and receiving bribes in order to uphold the principles of Good Corporate Governance and be free from all forms of Corruption, Collusion and Nepotism.
3. All BNI and Subsidiary Company personnel must play an active role in ensuring the implementation of the Anti-Bribery Management System and must report and take firm action against all forms of violations of the Anti-Bribery Policy.
4. Support the independent Anti-Bribery Compliance Function to develop and encourage continuous improvement of the Anti-Bribery Management System and provide strict supervision in the implementation phase.

C. Anti-Corruption Policy

The Anti-Corruption Policy at BNI stipulates, among other things, that:

1. Maintain Integrity, Professionalism, Banker Ethics, Transparency, Honesty, Consistency and always adhere to the Law and all applicable regulations as well as the corporate culture.
2. Must refuse giving and receiving bribes in order to uphold the principles of Good Corporate Governance and be free from all forms of Corruption, Collusion and Nepotism.

The policies mentioned above are binding and must be understood and implemented seriously by all levels of BNI personnel as part of the Code of Ethics and in order to support the implementation of GCG principles. If there is a violation or non-compliance with this policy, the violating party may be subject to sanctions according to the level of the violation and will be reported to the relevant parties in accordance with applicable law.

MONITORING AND ASSESSMENT OF GRATIFICATION CONTROL BY THE CORRUPTION ERADICATION COMMISSION

In order to increase the effectiveness of gratification control and prevent the occurrence of bribery practices or other acts of fraud/financial crimes that violate legislation, BNI established a Gratification Control Unit (UPG), which is placed in the Compliance Division to monitor and ensure that anti-bribery and gratification control policies and procedures are works as they should. In accordance with applicable internal regulations, BNI UPG is responsible for carrying out the following tasks:

1. Prepare rules, technical instructions, and other similar requirements to support the implementation of gratification control;
2. Receive, analyze, and administer reports of receipt and rejection of gratification. If necessary, UPG can ask the recipient of the gratification for information regarding the completeness of the gratification report.
3. Forward reports on receipt of gratuities to the Corruption Eradication Committee in accordance with applicable regulations.
4. Submit the results of the management of gratification reports and proposed gratification control policies to management/Board of Directors.
5. Map the vulnerable points for receiving and giving gratuities
6. Monitoring and evaluating the implementation of gratification control at BNI.
7. Carrying out advisory and socialization functions related to gratification control within BNI.
8. Coordinate with related units at BNI to carry out their duties and responsibilities as a gratification control unit at BNI.
9. Store gratification items and/or gratuity gifts and forward them to the Corruption Eradication Commission or convey them back to the reporter in accordance with the decision issued by the Corruption Eradication Commission and/or UPG.

As part of its main duties, UPG BNI submitted a report on the implementation of the Bank's Gratification Control Program to the Corruption Eradication Commission (KPK). Thanks to the consistency and commitment of all BNI employees, in 2025, UPG BNI achieved an Excellent rating for the Implementation of the Gratification Control Program (PPG).

In addition to assessing the implementation of the gratuity control program, the KPK conducted the Integrity Assessment Survey (SPI), a survey designed to measure integrity levels, corruption risks, and the effectiveness of corruption prevention efforts across Ministries, Institutions, Regional Governments, and SOEs (BUMN/BUMD).

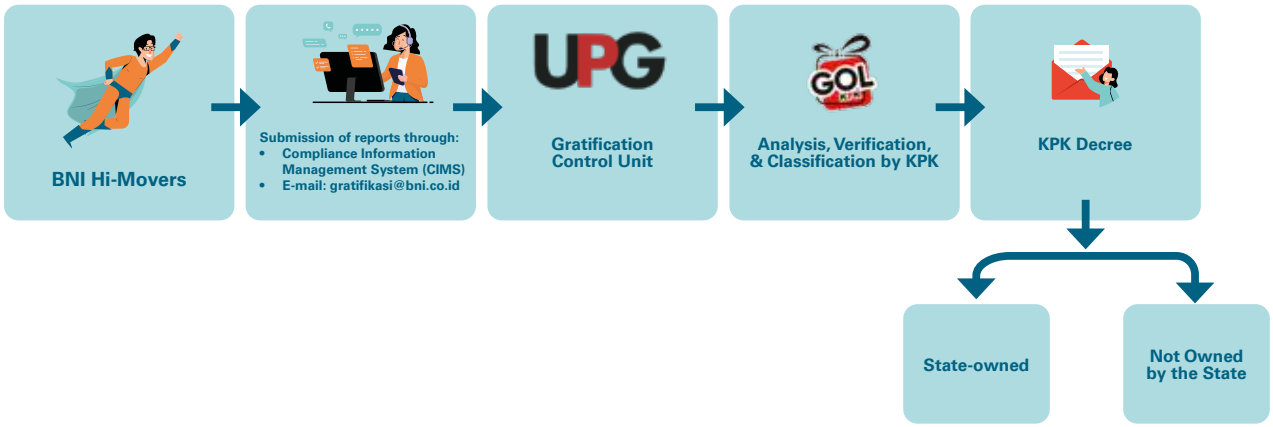
The implementation of the SPI involved a broad range of internal and external respondents, including employees, business partners, service users, and other Company stakeholders. In 2025, BNI received an assessment rating of "Maintained" (Terjaga).

The SPI results serve as a strategic evaluation used to formulate follow-up action plans and continuous improvement programs. Follow-up actions based on the survey results are integrated into policies, procedures, and integrity-strengthening programs, in line with the implementation of Good Corporate Governance (GCG) and the Anti-Bribery Management System.

GRATIFICATION REPORTING MECHANISM

To improve the effectiveness and transparency of gratification reporting, all BNI employees are required to report every acceptance or rejection of gratification to the BNI Gratification Control Unit (UPG) via the Compliance Information Management System (CIMS) portal, which can be accessed at cims.bni.co.id. or via email at gratifikasi@bni.co.id.

The explanation of the gratification reporting mechanism is as follows:



DECLARATION OF INTEGRITY PACT, CODE OF ETHICS, AND ANTI-BRIBERY AND ANTICORRUPTION COMMITMENT

In 2025, BNI reaffirmed its commitment to the implementation of integrity principles and work ethics through the declaration of the Integrity Pact, Code of Ethics, and anti-bribery and anti-corruption commitments across all organizational levels. This declaration was signed by the Board of Commissioners, the Board of Directors, and all BNI employees as a stance to uphold honesty, responsibility, and compliance with applicable laws and regulations.

This initiative not only strengthens the culture of compliance and ethics within the Bank but also solidifies BNI's reputation as a highly integrated and trusted financial institution.

2025 GRATIFICATION REPORT

In 2025, there were 237 reports of gratification submitted by BNI employees to BNI UPG. A total of 39 reports were forwarded to the Corruption Eradication Commission as gratification reports that must be reported, while the other 198 reports were included in gratuities that did not have to be reported.

ANTI-BRIBERY MANAGEMENT SYSTEM (SMAP)

In addition to gratification control efforts, BNI also appointed the Compliance Division as the manager of the Anti-Bribery Management System (SMAP). Thus, this effort is in line with BNI's commitment to improve integrity and transparency in every aspect of its operations.

On August 11, 2020, BNI achieving ISO 37001:2016 certification for the scope of Procurement of Goods and Services. Subsequently, on February 9, 2022, the scope of this certification was expanded to cover the Corporate Credit Segment, and in 2023, the certification was again expanded to cover Pension Fund

Activities. In 2025, the second surveillance audit was conducted, which indicated that the implementation of SMAP at BNI was consistent and free from material deviations. The achievement of this certification demonstrates that BNI has successfully managed its gratuity control, anti-bribery, and whistleblowing systems in accordance with ISO standards and internationally recognized best practices.

SOCIALIZATION OF ANTI-GRATIFICATION POLICY, GRATIFICATION REPORTING, AND ANTI-BRIBERY

BNI continuously raises employee awareness through various training and socialization activities on gratuities and anti-bribery. These activities are carried out regularly through various communication channels such as webinars, the official BNI website, BNI Forum, BNI DigiHC, BNI Menyapa, Instagram Quickpose, and the official BNI46 Instagram account.

Some of the activities, educational programs, and socialization efforts carried out by UPG BNI during 2025 include:

1. Submission of Gratuity Acceptance and Rejection Reports on BNI Forum.
2. Signing of the Gratuity & Anti-Bribery Declaration through the DigiHC application
3. Socialization of SMAP and World Anti-Corruption Day (HAKORDIA) to internal and external parties through videos, digital banners, and videotrons at BNI offices.
4. Appeal to the Board of Directors, Board of Commissioners, and all Divisions/Units/ Units not to give/accept gratuities related to religious holidays (Chinese New Year, Eid al-Fitr and Christmas) and New Year, which is also broadcast through internal communication media accessible to all employees, such as BNI Forum, DigiHC, and Instagram Quickpose, as well as to BNI stakeholders through posters, the BNI website, and national mass media.
5. Implementation of the 2025 Second Year Surveillance Audit with audit results showing no major or minor findings, demonstrating BNI's commitment and consistency in implementing SMAP.
6. Socialization by the Gratification Control Unit regarding gratification control and SMAP in Divisions, Regional Offices, and Branch Offices.
7. Anti-Corruption Technical Guidance for the Business Sector conducted by the Corruption Eradication Commission (KPK) for BNI's consultants, vendors, and business partners on 21 August 2025.
8. Organization of a Compliance Forum on 16 September 2025, themed "Decision-Making Based on the Business Judgment Rule in Support of Good Corporate Governance and Anti-Corruption," featuring speakers from the KPK and attended by all members of the Board of Directors, Board of Commissioners, Senior Executive Vice Presidents (SEVP), Boards of Directors and Boards of Commissioners of Subsidiaries, Division and Regional Heads, Anti-Corruption Counselors (PAKSI), Certified Integrity Builders (API), and all BNI employees.
9. Participation in the Integrity Assessment Survey (SPI) organized by the Corruption Eradication Commission (KPK) during the period of August–October 2025.

Policy for Procurement of Goods and/or Services

To support seamless business and banking operations, BNI carries out the procurement of goods and/or services based on operational needs, with reference to the Regulation of the Minister of State-Owned Enterprises No. PER 02 MBU 03 2023 on Corporate Governance Guidelines and Significant Corporate Actions of State-Owned Enterprises, which has been institutionalized through BNI's internal Procurement Corporate Guidelines.

Each procurement process for goods and/or services is implemented by applying the principles of efficiency, effectiveness, competitiveness, transparency, fairness and reasonableness, openness, and accountability, in line with the principles of Good Corporate Governance, from the planning stage through to the handover of work results. Through the consistent application of these principles, BNI ensures that every procurement activity delivers optimal value to the Bank and all stakeholders.

As a tangible manifestation of BNI's commitment to environmental, social, and governance aspects, BNI prioritizes responsible procurement practices and seeks to reduce environmental impacts by encouraging suppliers to comply with sustainability principles. BNI also supports the use of domestic products by requiring the possession of Domestic Component Level certification, and empowers micro, small, and medium enterprises as suppliers of goods and/or services.

To safeguard the quality and integrity of the procurement process, BNI conducts regular compliance audits and has implemented ISO 37001:2016 Anti Bribery Management System and ISO 9001:2015 Quality Management System certifications. These implementations reflect BNI's commitment to conducting procurement processes that are clean, professional, and aligned with international standards.

Core Principles of procurement of Goods and/or Services [ACGS B.4.2]

The procurement of goods and/or services at BNI is conducted in accordance with the principles of efficiency, effectiveness, competitiveness, transparency, fairness and reasonableness, openness, and accountability. The application of these principles is intended to ensure that every procurement activity delivers the best value for the Company through optimal use of resources, appropriate fulfillment of needs, and the creation of a healthy and balanced competitive environment. BNI is committed to building a reliable and transparent procurement system in order to optimize value for money, minimize the risk of irregularities, and maximize benefits for all stakeholders involved in the process, while consistently upholding high ethical standards and sound corporate governance.

The core procurement of goods and/or services principles at BNI are articulated as follows:

1. Efficient
   The procurement of goods and/or services shall be carried out to achieve optimal and best results within a reasonable timeframe, utilizing available funds as efficiently and reasonably as possible, and shall not be based solely on the lowest price. For the procurement of strategic goods and/or services with significant value, a total cost of ownership approach may be applied
2. Effective
   The procurement of goods and/or services shall be aligned with the defined needs and deliver the greatest possible benefits in accordance with the established objectives.
3. Competitive
   The procurement of goods and/or services shall be open to qualified providers and conducted through fair competition among providers that are equal and meet the specified requirements or criteria, based on clear and transparent provisions and procedures.
4. Transparent
   All provisions and information related to the procurement of goods and/or services, including administrative and technical requirements, evaluation methods, evaluation results, and the determination of prospective providers, shall be disclosed to interested participating providers.
5. Fair and Reasonable
   In the implementation of the procurement of goods and/or services, BNI provides equal treatment to all prospective providers that meet the requirements.

6. Open
   The procurement of goods and/or services may be participated in by all prospective providers that meet the specified requirements.
7. Accountable
   Procurement activities shall achieve their intended objectives and be accountable, thereby minimizing the potential for misuse or irregularities.

Ethics in Procurement of Procurement of Goods and/Services [ACGS: B.4.2]

BNI firmly establishes procurement ethics for goods and/or services that apply to all parties involved in the procurement process. These procurement ethics are intended to promote sound procurement practices, enhance the efficiency of budget utilization, prevent budget leakage, and ensure the implementation of a clean and integrity driven procurement process.

The ethics of procurement of goods and/or services at BNI are explained as foll:

1. Performing tasks diligently and responsibly to achieve procurement objectives and ensure smooth and timely execution.
2. Working professionally and independently while safeguarding confidential information to prevent procurement irregularities.
3. Avoiding any direct or indirect influence that may lead to unhealthy business competition.
4. Accepting and being accountable for all decisions made based on written agreements with relevant parties.
5. Preventing and avoiding conflicts of interest with any related parties that may result in unhealthy business competition.
6. Preventing and avoiding financial wastage and leakage.
7. Avoiding and preventing abuse of authority and/or collusion.
8. Refraining from offering, promising, or accepting gifts, rewards, commissions, rebates, or any other compensation from and for anyone related to procurement activities.

Methods and Mechanisms of Procurement of Goods and/Services [ACGS: B.4.2]

To ensure an efficient and on-target procurement process, BNI applies various methods for the procurement of goods and/or services, tailored to the characteristics and requirements of each project. The procurement of goods and/or services is carried out through the following methods: Open Tender or Open Selection, Limited Tender or Limited Selection, Direct Appointment, Direct Procurement, and Self-Management. Each method is governed by specific provisions and criteria designed to ensure that the process is conducted in accordance with the principles of effectiveness, transparency, and accountability.

The mechanisms for each of these procurement methods are as follows:

Procurement Method for Goods and/or Services	Implementation Mechanism
Open Tender or Open Selection	Procurement of goods and/or services that is publicly announced through mass media to provide equal opportunity for qualified providers of goods and/or services to participate in the procurement process.
Limited Tender or Limited Selection	Procurement of goods and/or services offered to a limited number of parties, with at least two invited bidders.
Direct Appointment	Procurement of goods and/or services conducted by directly appointing one provider of goods and/or services, or through appointment via a beauty contest, in accordance with the requirements for Direct Appointment.
Direct Procurement	Procurement of goods and/or services conducted through direct purchase of goods available in the market at market prices, including through electronic purchasing.
Self Management	Implementation of work carried out and/or supervised directly by BNI.

Overview of Procedures for Procurement of Goods and/or Services [ACGS: B.4.2]

Terms	Procurement of Goods and/or Services Refers to External and Internal Regulations (Procurement Corporate Guidelines)
Centralization of Goods and/or Services Procurement	In principle, the procurement of goods and/or services applies a centralized system, taking into account considerations of efficiency, effectiveness, and security. However, in certain circumstances, decentralization may be implemented by delegating part or all of the authority for procurement to designated units, while providing opportunities for internal participation in the procurement of goods and/or services.
Goods and/or Services Procurement Strategy	1. Improving the quality of procurement management. 2. Implementing procurement of goods and/or services through open contract systems and framework contracts to obtain the best prices. 3. Accelerating the procurement process for goods and/or services based on the nature of the work or type of goods and/or services. 4. Improving vendor management provisions related to vendor classification based on class or tier. 5. Digitalizing the procurement process for goods and/or services.
Separation of Functions	The separation of functions among units involved in the procurement of goods and/or services is as follows: 1. The requesting unit. 2. The procurement implementing unit that carries out the procurement process. 3. The vendor management unit that conducts selection of prospective vendors and recommends participating vendors for the procurement of goods and/or services. 4. The unit that analyzes and prepares cost estimates or Owner's Estimate. 5. The unit that prepares contracts. 6. The unit that reviews the completeness of payment document requirements. 7. The unit that performs project supervision and control in accordance with the contract documents until project handover.
Leveling of Deciding Authority	The authority to make decisions in the procurement of goods and/or services is exercised in stages, taking into account the level of risk and the value of the procurement, through decision making mechanisms within the Procurement Committee.

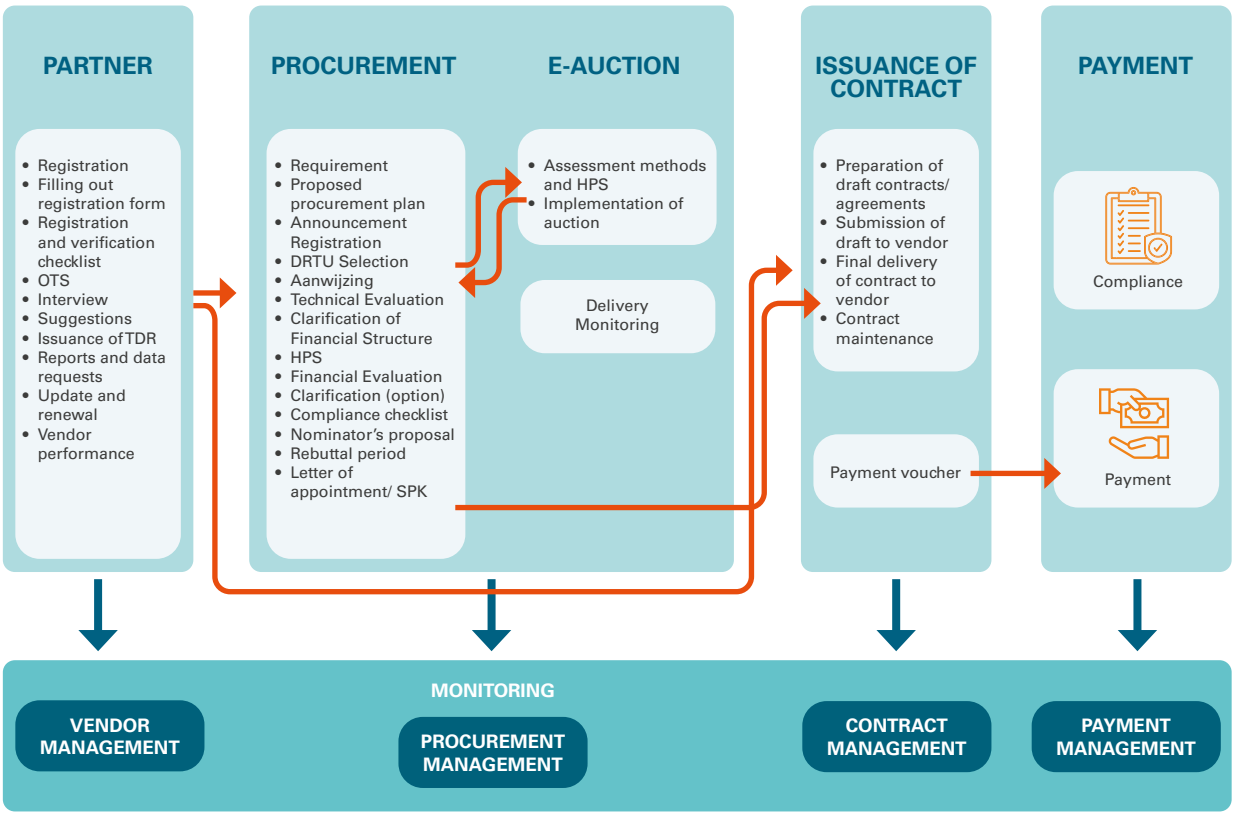
PROCUREMENT THROUGH THE ELECTRONIC PROCUREMENT SYSTEM (E-PROC)

In line with technological advancements and its commitment to enhancing efficiency and transparency, BNI has implemented a digital based procurement system for goods and/or services, known as electronic procurement (e Proc). Through this web based platform, all parties involved, including vendors or prospective business partners, procurement committees, and internal BNI units, are able to interact online within a single integrated system. The procurement process is conducted on an end to end basis, covering vendor registration, the execution of procurement stages, compliance testing, contract signing, and payment processing. This approach enables BNI to carry out procurement activities that are more efficient, accountable, and easier to monitor.

BNI's electronic procurement system (e Proc) can be accessed through BNI's corporate website or directly via https://e-proc.bni.co.id. The development of the e Proc system and related policies forms part of BNI's digital transformation strategy to strengthen its competitiveness in an increasingly digitalized banking industry. Through e Proc, BNI delivers a fully digitalized procurement process supported by key modules such as Procurement Management, Vendor Management, and Contract Management, which are designed to enhance efficiency, transparency, and integration across all stages of the procurement of goods and/or services.

Since 2018, e-Procurement has been implemented at the Head Office, with the objective of integrating and effectively monitoring all procurement processes for goods and/or services at the Head Office.

FLOW OF PROCUREMENT PROCESS THROUGH ELECTRONIC PROCUREMENT (E-PROC) APPLICATION



CERTIFICATION RELATED TO THE MANAGEMENT OF GOODS AND/OR SERVICES PROCUREMENT

ISO 37001:2016 Anti-bribery Management System	In an effort to enhance integrity and transparency, BNI successfully obtained the SNI ISO 37001:2016 certification for its Anti-Bribery Management System on August 11, 2020, specifically covering the scope of Goods and Services Procurement. This certification was renewed on January 1, 2024, and is valid for three years, encompassing the Goods and Services Procurement Process, Corporate Credit Segment, and Pension Funds. BNI is committed to conducting all its activities based on principles of accountability and responsibility, implementing the AKHLAK values as the foundation of corporate governance, adhering to Principle 46, and complying with BNI's Code of Ethics and applicable regulations. As a tangible manifestation of this commitment, BNI strives to: 1. Uphold honest, sincere, and disciplined behavior, and act with consistency and responsibility; 2. Implement statutory and internal regulations related to the Anti-Bribery Management System in every action and decision-making process; 3. Take a firm stance against all forms of bribery to establish good corporate governance and eliminate Corruption, Collusion, and Nepotism (CCN); 4. Actively ensure the implementation of the Anti-Bribery Management System, including reporting suspected violations of anti-bribery policies in accordance with the mechanisms in place at PT Bank Negara Indonesia (Persero) Tbk; 5. Accept the sanctions determined by the company if found in violation of the anti-bribery policy. To combat CCN (Corruption, Collusion, and Nepotism) practices and bribery, BNI has designated the Compliance Division as an independent function responsible for developing and overseeing the implementation of the Anti-Bribery Management System. This unit is also authorized to take decisive actions against any violations. To ensure the Anti-Bribery Management System policy is well-received by all internal and external stakeholders, socialization efforts targeting the BNI environment and other stakeholders remain crucial. In 2025, BNI successfully maintained its Anti-Bribery Management System Certification after undergoing a re-certification audit of goods and/or services procurement in 2023.

ISO 9001:2015 Quality Management System for Own Estimate Price Section (HPS)	To improve the quality of the management of Own Estimate Price (HPS) in accordance with international standards, BNI has successfully obtained ISO 9001:2015 certification in the field of Quality Management System for the management of Own Estimate Price. This certification reflects BNI's commitment to being a reliable service provider for customers, by offering fair and timely prices, and complying with all applicable laws and regulations. BNI also continues to make continuous improvements to improve service quality in accordance with international standards and practices. In 2025, BNI successfully maintained the second Surveillance Audit for ISO 9001:2015 Quality Management System Certification in the Self Estimate Price (HPS) function.
ISO 9001:2015 Quality Management System in the Vendor Management Section	BNI's commitment to improving the quality of vendor management in accordance with international standards is demonstrated through its ISO 9001:2015 certification for Quality Management Systems in Vendor Management.This certification serves as tangible evidence of BNI's dedication to providing reliable and professional vendor services to ensure the smooth execution of goods and/or services procurement processes. With this certification, BNI not only highlights its ability to recommend high-quality vendors that meet specifications but also affirms that its vendor management processes comply with global quality standards. This instills greater confidence among BNI's business partners and customers that all procurement processes are managed with transparency and high professionalism. Moreover, BNI consistently conducts evaluations and continuous improvements to enhance the quality of its vendor management services. In 2025, BNI successfully maintained its Surveillance Audit, reaffirming its commitment to upholding high-quality standards in all aspects of vendor management. This achievement further solidifies BNI's position as a bank that implements best practices in vendor management, ensuring that all procurement processes adhere to international standards and practices to achieve sustainable operational excellence.

PARTNER EVALUATION (DUE DILIGENCE) IN 2025

BNI consistently conducts comprehensive due diligence evaluations of its business partners to ensure that all partners engaged meet the quality, compliance, and integrity standards established by the Bank.

This evaluation process encompasses a review of various key aspects, including legal standing, operational capability, financial condition, experience, as well as corporate track record and reputation. In addition, BNI assesses the extent to which its partners apply Good Corporate Governance principles, comply with applicable regulations, and give due consideration to sustainability aspects in their operations.

Through the implementation of a rigorous and well-structured due diligence process, BNI seeks to minimize potential legal, operational, and reputational risks, while ensuring that each partner is able to effectively support the achievement of BNI's strategic objectives and the long term sustainability of its business.

Company Code of Ethics [ACGS D.2.1, D.2.2, D.2.3]

BNI has established and implemented aCode of Conduct as the primary guideline for maintaining integrity, professionalism, and accountability among all employees in carrying out business activities. The Code of Ethics clearly regulates fundamental values, business ethics, work ethics, and commitment to corporate regulations, ensuring that all business activities are conducted in accordance with principles of honesty, compliance, and good corporate governance.

The Code also provides clear direction regarding behavioral boundaries and appropriate forms of interaction — including those that are prohibited — between employees and customers, business partners, and other stakeholders, in order to foster ethical and constructive relationships. The BNI Code of Ethics was developed based on the Bank's vision, mission, and core values, while also aligning with internal policies and evolving market dynamics.

Key Principles of The Code of Ethics [ACGS D.2.1]

All BNI Hi-Movers are required to comply with the following fourteen (14) key provisions of the BNI Code of Ethics:

1. Acting professionally, upholding the Beliefs work culture and AKHLAK Core Values.
2. Serving as role models and reminding subordinates, supervisors, colleagues, and business partners to implement the BNI Code of Ethics.
3. Maintaining good relationships among fellow BNI Hi-Movers.
4. Safeguarding bank confidentiality and confidentiality of position.
5. Ensuring workplace safety and security.
6. Protecting health, natural resources, and the environment.
7. Recording, reporting, and administering work accurately, honestly, and properly.
8. Preventing conflicts of interest that may harm BNI.
9. Refraining from giving or receiving gifts of any form — directly or indirectly — from any party related to job duties and responsibilities.
10. Acting as a spokesperson only in the best interest of BNI.
11. Not becoming members or donors of political parties.
12. Not disseminating false information regarding BNI.
13. Not using BNI assets for personal interests.
14. Not misusing BNI corporate identity for personal gain.

Applicability of The Code of Ethics Across The Organization [ACGS D.2.1 D.2.2]

The BNI Code of Ethics applies to all personnel at every organizational level — both permanent and non-permanent employees — including the Board of Directors and the Board of Commissioners. Compliance with the Code reflects the commitment of all BNI Hi-Movers to perform their duties and responsibilities with integrity and the highest ethical standards.

This commitment is demonstrated through the signing of an Integrity Pact by every employee, affirming their pledge to uphold ethics, transparency, and professionalism in daily work activities.

Code of Ethics Related to Anti-Corruption

[ACGS B.4.5, D.2.1, D.2.2]

BNI consistently promotes an anti-corruption culture across the organization by fostering an integrity-based, transparent, and KKN-free work environment. A key milestone was the establishment of the Gratification Control Unit (UPG), initiated through the signing of the Anti-Gratification Commitment between BNI's President Director and the Corruption Eradication Commission (KPK) on 17 October 2016.

This initiative strengthens BNI's compliance with anti-corruption regulations and ensures that business operations are conducted prudently and in line with good governance principles. Under the Code of Ethics, every employee is strictly prohibited from giving or receiving gifts, rewards, or any form of gratification — directly or indirectly — from any party related to their duties and responsibilities.

Code of Ethics Related to Vendors [ACGS D.2.1]

BNI frequently collaborates with third parties to support the smooth operation of the Bank's operations. To implement an anti-corruption culture, BNI ensures that every employee understands and adheres to good business ethics, as outlined in the BNI Code of Ethics, particularly regarding professional relationships with vendors. The anti-corruption policies regarding vendors contained in the BNI Code of Ethics include:

1. Working professionally and independently while maintaining confidentiality to prevent irregularities in procurement.
2. Avoiding direct or indirect influence that may result in unhealthy business competition.
3. Accepting and being accountable for decisions made in accordance with written agreements.
4. Preventing and avoiding conflicts of interest with related parties that could affect fair business competition.
5. Striving to prevent waste and financial leakage of public or corporate funds.
6. Preventing the misuse of authority and collusion practices that could harm the procurement process.
7. Avoiding offering, promising, or accepting gifts, rewards, commissions, rebates, or other forms of compensation related to goods and/or services procurement.

Signing of The Integrity Pact [ACGS D.2.1]

As a commitment to an ethical work environment and adherence to the Code of Ethics, all BNI Hi-Movers across organizational levels sign the Employee Integrity Pact as a declaration to uphold integrity, transparency, and professionalism.

Through this signing, every employee is expected to fully understand the content and meaning of the Integrity Pact and reaffirm their personal commitment to reject all forms of corruption, gratification, bribery, and other ethical violations.

Throughout 2025, implementation of the Integrity Pact achieved 100% compliance, reflecting the strong commitment of BNI employees to building an ethical, disciplined, and highly-integrity work culture.

Dissemination and Socialization of The Code of Ethics [ACGS D.2.1]

To cultivate a governance-driven corporate culture, BNI consistently communicates and internalizes the principles of the Code of Ethics to all BNI Hi-Movers employees, both those working at the Head Office and Regional Offices, as well as branch offices. The means used to disseminate the BNI Code of Ethics are as follows:

1. Pocket-book versions of the BNI Code of Ethics distributed to all employees.
2. E-learning modules accessible to all employees.
3. Sharing sessions within divisions/work units.
4. Internal digital communication platforms (DigiHC, BNI Smarter, BNI CorpuTV, BNI Menyapa, Sinergi Magazine, BNI Forum), internal displays, and internal social media channels such as Instagram @quickpose.

Internalization is also reinforced through regular GCG and ethics training for all BNI Hi-Movers — both new hires and experienced employees — complemented by coaching from direct supervisors. To ensure effective implementation, BNI applies rigorous oversight mechanisms and enforces firm sanctions for violations as part of discipline and corrective learning, thereby ensuring that all employees consistently uphold ethical conduct and integrity in their work.

Implementation and Enforcement through Multiple Channels [ACGS D.2.1, D.2.3]

The implementation and enforcement of the Code of Ethics form an integral component of Good Corporate Governance (GCG) across all levels of BNI. The Code of Ethics functions as a guiding framework for the Board of Commissioners, the Board of Directors, and all employees in carrying out the Bank's vision and mission. BNI consistently monitors adherence and provides a Whistleblowing System (WBS) as a secure channel for reporting violations, with full assurance of reporter confidentiality. Each report must be supported by valid evidence to be processed, and any breach of the Code of Ethics is subject to firm, non-discriminatory sanctions — underscoring BNI's commitment to integrity and sound governance.

In addition to the WBS, BNI also provides several internal communication channels to facilitate reporting and identification of potential Code of Ethics violations, including:
Reporting channels include:
1. Website: http://bni-transparan.tipoffs.info
2. E-mail: bni-transparan@tipoffs.com.sg
3. Phone: 021-57853377
4. SMS & WhatsApp: 0811-970-1946
5. Mail: BNI Transparan, P.O. BOX 2646, JKP 10026

Types and Forms of Sanctions for Code of Ethics Violations [ACGS D.2.1]

Any employee proven to have violated the Code of Ethics is subject to strict sanctions in accordance with the severity of the violation. Details of violations and sanctions are presented in the following table:

Principal Sanctions	Types of Code of Ethics Violations
Preliminary Guidance Letter	Violations of critical activities are defined as those that have not yet resulted in a loss to BNI.
Letter of Guidance (SP)	Violations of rules, policies, procedures, and obligations that do not result in losses.
Letter of Reprimand (STE)	Violations of rules, policies, procedures, and obligations that result in non-material losses.
Letter of Strong Reprimand (STK)	Violations of policies, procedures, and obligations that result in both material and non-material losses.
Demotion	Violations of policies, procedures, and obligations that result in material losses, but without fraud, deceit, fictitious acts, fabrications, and/or gratification.
Termination of Employment (PHK)	Violations of policies, procedures, and obligations that result in intentional material losses and contain elements of fabrication, fraud, and/or fictitious transactions.

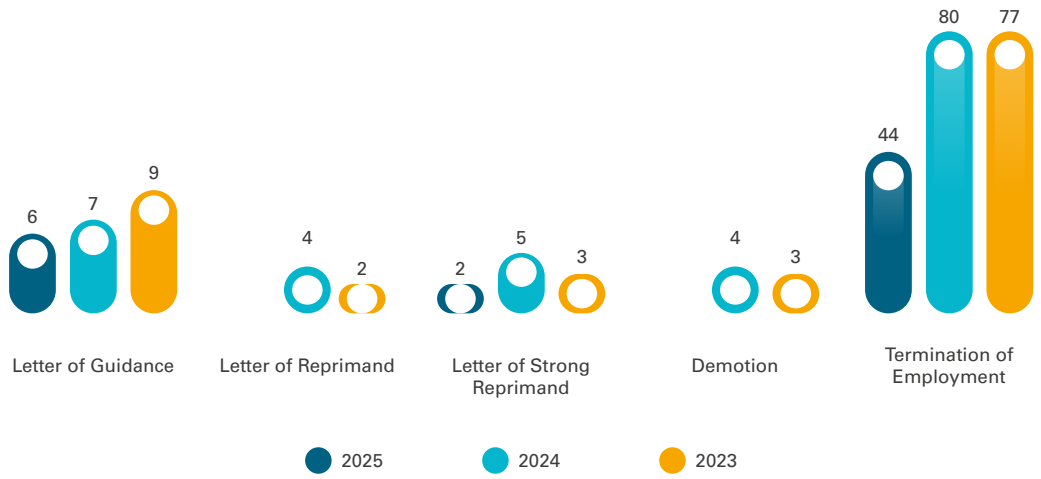
Code of Ethics Violations and Handling in 2025 [ACGS D.2.1]

Throughout 2025, there were 44 Code of Ethics violations at BNI — a significant decrease from the previous year, which recorded 80 violations. This decline demonstrates meaningful progress resulting from BNI's efforts to consistently enforce the Code of Ethics.

BNI has taken firm and appropriate corrective actions by imposing sanctions, as outlined in the following table:

Principal Sanctions	2025	2024	2023
Letter of Guidance	6	7	9
Letter of Reprimand	0	4	2
Letter of Strong Reprimand	2	5	3
Demotion	0	4	3
Termination of Employment	36	60	60
Total	**44**	**80**	**77**

Trends in Sanctions for Code of Ethics Violations 2023-2025



Corporate Values and Culture

As part of a State-Owned Enterprise (BUMN), BNI adopts the AKHLAK core values — Amanah (Trustworthy), Kompeten (Competent), Harmonis (Harmonious), Loyal (Loyal), Adaptif (Adaptive), and Kolaboratif (Collaborative) — as the primary foundation for building its corporate culture. These values serve as moral and ethical guidelines for all BNI Hi-Movers in carrying out their duties, interacting with others, and making decisions. Through the consistent application of AKHLAK across all organizational levels, BNI is committed to fostering a work environment that is ethical, professional, and collaborative, while simultaneously strengthening the Company's competitiveness and reputation both nationally and globally.

Nilai Utama

Amanah | **Kompeten** | **Harmonis** | **Loyal** | **Adaptif** | **Kolaboratif**

Code of Conduct [ACGS D.2.1]

BNI has established 18 behavioral guidelines, as follows:

1. Fulfilling commitments and promises that have been made.
2. Taking responsibility for every task, decision, and action taken.
3. Upholding moral and ethical values.
4. Continuously improving competencies to respond to evolving challenges.
5. Supporting others in learning and developing.
6. Completing assignments with the highest quality.
7. Respecting every individual regardless of background.
8. Demonstrating a willingness to help others.
9. Creating a harmonious and conducive work environment.
10. Safeguarding the reputation of colleagues, leaders, State-Owned Enterprises, and the nation.
11. Willingly making sacrifices to achieve greater goals.
12. Complying with superiors' directions, as long as they do not conflict with law and ethics.
13. Adapting quickly in order to improve.
14. Continuously striving for ongoing improvement.
15. Acting proactively.
16. Providing opportunities for everyone to contribute.
17. Being open to collaboration in order to create added value.
18. Mobilizing the use of available resources to achieve shared objectives.

Allocation of Funds for Social and Political Activities

BNI is committed to providing a real contribution to improving community welfare and environmental preservation through the implementation of the Social and Environmental Responsibility (TJSL) Program. This program is strategically and sustainably designed to be on target and capable of meeting community needs, particularly for those living around the Bank's operational areas. Every year, BNI consistently allocates TJSL funds as a form of social responsibility and a manifestation of the Company's concern for balanced economic, social, and environmental development. In 2025, the total realized TJSL budget reached IDR116.82 billion, an increase/decrease from the previous year of IDR129.9 billion, reflecting BNI's commitment to creating a sustainable positive impact.

Furthermore, BNI also emphasizes its policy on political neutrality by prohibiting all BNI Hi-Movers from becoming members, donors, or being involved in political party activities. Throughout 2024 and 2025, BNI ensured that no funds or support of any kind were provided for political activities, as part of the Company's commitment to maintaining integrity, independence, and professionalism in conducting all business activities.

Provision of Funds for Related Parties and Provision of Large Exposure [ACGS C.4]

BNI has established a comprehensive set of policies and procedures that govern the Legal Lending Limit (BMPK) and credit distribution to related parties, including those governing credit limits for industry sectors and the mechanisms for monitoring and resolution. To ensure effective implementation in line with prudential principles, BNI regularly convenes meetings of the Credit Procedures Committee, the Credit Policy Committee, and the Board of Directors to discuss evaluations, policy enhancements, and operational implementation in lending. These measures are undertaken to mitigate credit risk and maintain the quality of the Bank's financing portfolio.

Pursuant to OJK regulations on good governance implementation for commercial banks, BNI applies the principles of prudential banking in all funding activities, particularly on related parties and large exposures. This principle is reflected through portfolio diversification to avoid excessive risk concentration. Policy funding provided to related parties, including members of the Board of Directors, the Board of Commissioners, Executive Officers, and large exposures, is also implemented in compliance with OJK Circular Letter No. 14/SEOJK.03/2025 on the Implementation of Good Governance for Commercial Banks, especially on the Governance Transparency section.

To ensure that funding to related parties and large exposures is conducted in accordance with prudential principles, BNI manages the following risk management aspects:

1. Establishing clear policies and procedures covering the entire credit process, from credit origination through approval, monitoring, and recovery.
2. Requiring that the provision of funds to related parties obtain prior approval from the Board of Commissioners.
3. Reporting the provision of funds above a specified threshold to the Board of Commissioners, which may request explanations from the Board of Directors where deemed necessary.
4. Conducting audits by the Internal Audit Unit based on risk assessments to ensure the adequacy of risk management and internal control, including within the credit approval process.

In providing funds to related parties and in large exposures, BNI applies a Credit Risk Appetite grounded in prudential principles, as follows:

1. The implementation of an Internal Rating System and Loan Portfolio Management, supported by an early warning system to prevent breaches of the Legal Lending Limit (BMPK), including the application of House Limits and Country Exposure Limits.
2. Periodic reporting of capital position and the Capital Adequacy Ratio (CAR) to management and regulators, which serves as a key reference in conducting business activities, particularly in the provision of funds.

POLICY ON THE PROVISION OF FUNDS TO RELATED PARTIES [ACGS C.4.1]

In providing funds to related parties, BNI consistently applies prudential banking principles and ensures full compliance with internal policies, regulatory requirements, and applicable laws and regulations. All funding decisions are subject to a tiered review process with transparent evaluation mechanisms, ensuring that decisions are made prudently and in line with the principles of good corporate governance.

Furthermore, in managing material transactions with related parties or transactions that may give rise to conflicts of interest, BNI has established robust internal control procedures. Thresholds have been defined for such transactions to obtain approval from the Board of Commissioners or the General Meeting of Shareholders, upon recommendation from the Audit Committee, and to be reported to regulators and disclosed to the public as part of BNI's commitment to transparency, in accordance

with OJK Regulation No.42/POJK.04/2020 on Affiliated Transactions and Conflicts of Interest and OJK Regulation No.17/POJK.04/2020 on Material Transactions and Changes in Business Activities.

In 2025, BNI did not conduct any material transactions with affiliated parties that involved conflicts of interest. [ACGS A.8.1]

POLICY ON LARGE EXPOSURES

Large exposure refers to the provision of funds to a single borrower or a single group of borrowers, other than related parties, amounting to 10 percent or more of the Bank's core capital (Tier 1). In distributing such funding, BNI consistently applies a comprehensive and highly prudent creditworthiness assessment process, using the same standards applied to general borrowers, in line with prudential banking principles, transparency, and good corporate governance.

In 2025, there were no violations or exceedances of the Legal Lending Limit (BMPK) in relation to large exposures. Detailed information on funding provided to related parties, including the nature of the relationship, the nature of the transactions, and the transaction values during 2025, has been disclosed in the Notes to the Consolidated Financial Statements, which form an integral part of this Annual Report.

REPORTING AND DISCLOSURE

BNI submits Legal Lending Limit (BMPK) reports in accordance with the requirements stipulated by the regulator, namely the Financial Services Authority (OJK). Information relating to the provision of funds to Related Parties and to the 20 (twenty) largest non related borrowers, both on an individual and group basis, at BNI during 2025, is presented as follows:

Provision of Funds	2025		2024	
	Number of Debtors	Nominal Amount (IDR million)	Number of Debtors	Nominal Amount (IDR million)
To Related Parties	315	2,112,555	341	2,191,892
To Debtors:	20	284,927,533	20	237,908,427
a) Individuals	1	20,839,756	2	27,407,091
b) Group	19	264,087,777	18	210,501,336

Credit Granting for Related Party

As a manifestation of its commitment to implementing responsible and prudent banking practices, BN has set a clear and measurable policy for the provision of credit to related parties. This policy refers to the provisions of POJK No. 32/POJK.03/2018 concerning the Maximum Limit for Credit Provision and Large Fund Provision for Commercial Banks, as updated through POJK No. 38/POJK.03/2019.

Pursuant to Article 5 of POJK 32/2018, the total portfolio of funds provided to related parties shall be set at a maximum of 10% (ten percent) of the Bank's capital. This limit's setting is to ensure controlled risk exposure management and maintain the Bank's financial stability and health.

The provision of funds encompasses various forms of Bank investment, such as credit, securities, placements, receivables on securities purchased with agreements to resell (reverse repos), and other forms of fund provision that meet regulatory requirements.

The policy for the Provision of Credit to Related Parties at BNI is outlined in the Company Guidelines. This policy stipulates that the Bank is prohibited from providing Provision of Funds (hereinafter referred to as "Provision of Credit") to Related Parties without the approval of the Board of Commissioners and without violating general procedures for Provision of Funds. Furthermore, the provision of credit to prospective debtors/debtors who are related to each other or who have a conflict of interest with the credit processor and/or decision-maker is also regulated in the Company Guidelines. Related Parties, as stipulated in POJK No. 32/POJK.03/2018 as later amended by POJK No. 38/POJK.03/2019, include:

a. Individuals or companies under whom the Bank is under control of.
b. Legal entities, in cases where the Bank acts as the -controller.
c. Companies, in certain cases where the individuals or companies referred to in letter a act as the controller.
d. Members of the Board of Directors, Members of the Board of Commissioners, and Executive Officers of the Bank; Referred to as Executive Officers are officials who report directly to the Board of Directors or have significant influence over the Bank's policies and/or operations, including division heads, regional office heads, branch office heads, functional office heads whose positions are at least equivalent to branch office heads, heads of risk management units, heads of compliance units, and heads of internal audit units, and/or other equivalent officials.
e. Parties with horizontal or vertical familial relationships:
   1) From individuals who control the Bank as referred to in letter a; and
   2) From members of the Board of Directors and/or members of the Board of Commissioners at the Bank as referred to in letter d.
   Horizontal or vertical familial relationships include:
   - biological/step/adoptive parents;
   - biological/step/adoptive siblings;
   - biological/step/adoptive children;
   - biological/step/adoptive grandparents;
   - biological/step/adoptive grandchildren;
   - biological/step/adoptive siblings of parents;
   - husband or wife;
   - in-laws;
   - husband or wife of biological/step/adoptive children;
   - the grandfather or grandmother of a husband or wife;
   - the husband or wife of a biological/step/adoptive grandchild; or
   - the biological/step/adoptive sibling of a husband or wife and the husband or wife of the sibling concerned.
   f. Members of the Board of Directors and/or members of the Board of Commissioners, in companies referred to in letters a, b, and/or c.
   g. Companies whose members of their Board of Directors and/or members of the Board of Commissioners are also members of the Board of Commissioners of the Bank.

h. Companies/entities where 50% (fifty percent) or more of their members of the Board of Directors and/or members of the Board of Commissioners are also members of the Board of Directors and/or Commissioners of a company referred to in letters a, b, and/or c.
i. Companies/entities where:
   1) Members of the Board of Directors, members of the Board of Commissioners, and/or Executive Officers of the Bank as referred to in letter d. act as controllers; and
   2) Members of the Board of Directors and/or members of the Board of Commissioners of the parties referred to in letters a, b, and/or c, act as controllers.
j. Collective investment contracts where the Bank and/or parties referred to in letters a to i. owns 10% (ten percent) or more of the shares in the Investment Manager of the collective investment contract.
k. Companies that have financial relationships with the Bank and/or parties as referred to in letters a. to i. Financial relationships are analyzed based on several factors, namely:
   1) there is financial assistance from the Bank and/or Related Parties or financial assistance to Banks and/or other Related Parties with terms that give the party providing the financial assistance the ability to determine (controlling influence) the strategic policies of the company receiving the financial assistance;
   2) There is a significant business chain relationship in the Bank's or Related Party's business operations with other companies, resulting in dependency between one party and another, resulting in:
      - One party being unable to easily transfer business transactions to another party; and
      - The inability to easily transfer business transactions causes significant disruption to one party's cash flow, making it difficult to meet obligations; and/or
   3) There is a transfer of credit risk through a guarantee, where the party providing the guarantee will assume some or all of the financial risk from the guaranteed party.
l. The borrower is an individual or non-bank company that has a financial relationship through the provision of a guarantee to the party referred to in letters a through k.
m. m. The borrower has a financial relationship through a guarantee provided by the party referred to in letters a through k.
n. Another bank that has a financial relationship through the provision of a guarantee to the party referred to in letters a through k, in the event of a counter guarantee from the Bank and/or the party referred to in letters a through k to the other bank.
o. Other companies in which a party, individually or jointly, has an interest in the form of a 10% (ten percent) or more share ownership, either from the parties referred to in letter e.

Credit provided to debtors who are not Related Parties, but ones that benefit from its privileges, is categorized as Credit Provided to Related Parties. Here, BNI remains committed to managing credit extended to related parties in accordance with the principle of prudence and ensuring that the fund provision ratio remains regulatory-compliant. Furthermore, BNI implements strict internal supervision at every stage of the credit-granting process for Related Parties. This step is taken to ensure that the entire process is transparent, measurable, and in accordance with established regulations. This policy should prevent potential conflicts of interest and maintain the Bank's financial integrity.

Protection of Creditors' Rights [ACGS B.4.6]

BNI is firmly committed to safeguarding the rights of its creditors through transparent, accurate, and equitable disclosure of information. Guided by the principle of equal treatment, BNI ensures that all creditors and business partners have access to relevant information, enabling objective and well-considered decision-making. Beyond transparency, BNI is committed to fulfilling all obligations to creditors punctually and in accordance with applicable provisions and contractual agreements. The Bank consistently seeks to avoid delays or negligence that could create potential losses for any party. These practices reflect BNI's alignment with the principles of the ASEAN Corporate Governance Scorecard, which emphasize transparency, accountability, and the protection of creditors' rights as an integral part of corporate responsibility. [ACGS B.4.6]

Transparency of the Bank's Financial and Non-Financial Conditions

BNI is committed to strengthening consistency in the implementation of good corporate governance, particularly with respect to the application of the principle of information transparency. This commitment is demonstrated through full compliance with all transparency requirements, both in the disclosure of financial and non financial information to stakeholders.

BNI ensures that all published information is accurate, timely, and easily accessible, as a manifestation of responsibility and accountability to the public. Information disclosure is carried out through various official channels, including print media and BNI's official website at https://www.bni.co.id/id-id/, enabling all stakeholders to obtain up to date information regarding the Bank's performance and activities in a transparent manner.

In this regard, BNI has established policies and procedures governing the implementation of transparency for financial and non financial conditions, with reference to Financial Services Authority Regulation No. 37/POJK.03/2019 concerning Transparency and Publication of Bank Reports, FSA Regulation No. 29/POJK.04/2016 concerning Annual Reports of Issuers or Public Companies, and FSA Circular Letter No. 16/SEOJK.04/2021 concerning the Form and Content of Annual Reports of Issuers or Public Companies.

TRANSPARENCY OF FINANCIAL CONDITION

Throughout 2025, BNI consistently fulfilled its financial reporting obligations to regulators, including the Financial Services Authority (OJK), the Indonesia Stock Exchange (IDX), and the State Owned Enterprises Supervisory Agency (BP BUMN), in a timely, complete, and accurate manner. The reports prepared comprised monthly, quarterly, and annual financial statements, all of which were presented in accordance with Bank Indonesia regulations on the Transparency of Banks' Financial Conditions.

In addition to financial statements, BNI also submitted its Annual Report to regulators, rating agencies, research institutions, and other relevant parties, including periodic and incidental reports to comply with capital market regulations. All information related to the transparency of the Bank's financial condition is published through the OJK reporting system, BNI's official website, and the Indonesia Stock Exchange website, as a manifestation of BNI's commitment to maintaining transparency and accountability to all stakeholders.

TRANSPARENCY OF NON-FINANCIAL CONDITION

BNI also ensures the openness of information regarding the Bank's non-financial conditions, which includes developments in corporate governance, vision, mission, and the composition and profile of the management team.This information is published through the Annual Report, the Bank's official website, and various other media that can be easily accessed by customers and the general public.

In 2025, BNI has compiled and presented reports related to the transparency of the Bank's nonfinancial conditions, taking into account the procedures, types, and scope as regulated by applicable POJK regulations, and has provided and published additional information concerning nonfinancial conditions, including the following:

1. Disclosure of Corporate Governance Information, including the Corporate Governance Annual Report, Vision, Mission, Company Values, Code of Ethics, Composition and Profile of the Board of Commissioners and Board of Directors, as well as internal governance regulations from the Articles of Association to the Corporate Charter, which are also published through BNI's website;
2. Information on the Company's Products and Services, including its branch network, published through the Annual Report and BNI's website, to enable customers, investors, and the general public to easily access information on BNI's products and services;
3. Information on Complaint Submission Procedures, Safe Banking Tips for Customers to maintain data privacy while using banking services, published through BNI's website to comply with consumer protection regulations; and
4. Other Information aimed at supporting information transparency, financial education, and services to the community.

Transparency in Customer Complaint Handling and Dispute Resolution

BNI is committed to delivering transparent, responsive, and customer-oriented services, particularly in handling complaints and resolving disputes. To ensure ease of access, BNI provides multiple complaint channels that customers can reach both online and offline, including the official website, banking applications, the Customer Experience Center, and all BNI branch offices.

Every complaint received becomes a shared responsibility of the relevant units and is handled professionally and transparently, guided by a Service Level Agreement (SLA) to ensure resolution that is prompt, fair, and compliant with established procedures. For disputes requiring further handling, BNI prioritizes internal mediation mechanisms to achieve the best solution for both parties, while also allowing for the involvement of independent third parties as permitted by applicable laws and regulations.

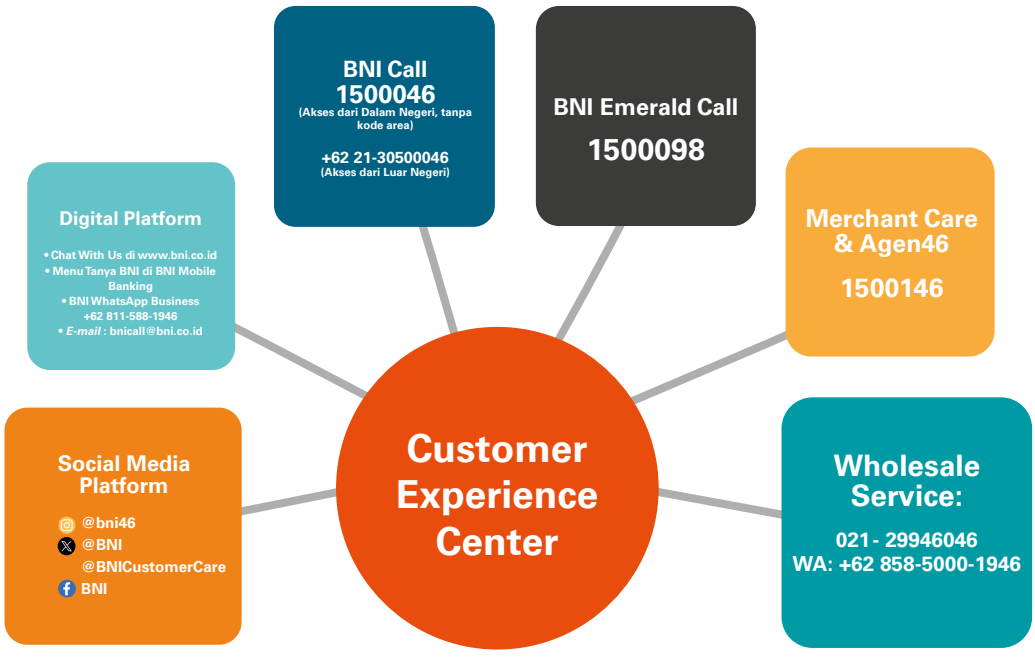
Through the implementation of an integrated complaint-management system, BNI continues to strengthen customer trust and loyalty, using every piece of feedback as input to improve and enhance service quality going forward.

EASE OF ACCESS TO SERVICES

Customer Experience Center as a BNI Touch Point

In an effort to maintain transparency and improve service quality, BNI welcomes every complaint, suggestion, and input from customers. Through the Customer Experience Center as one of BNI's primary touch points, the Bank provides 24-hour service every day, offering speed and convenience for customers in obtaining information, conducting transactions, and receiving solutions to any issues they may encounter.

All BNI customers may submit complaints through:



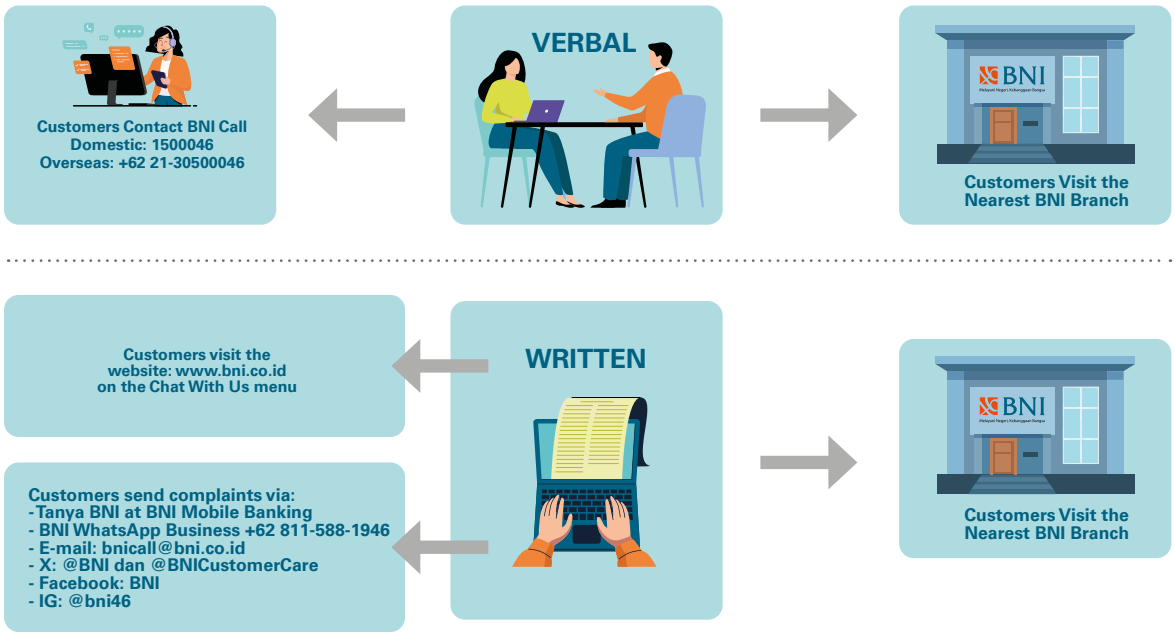
In addition, customers may lodge complaints through any BNI branch office throughout Indonesia.

PROCEDURES FOR HANDLING AND RESOLVING CUSTOMER COMPLAINTS

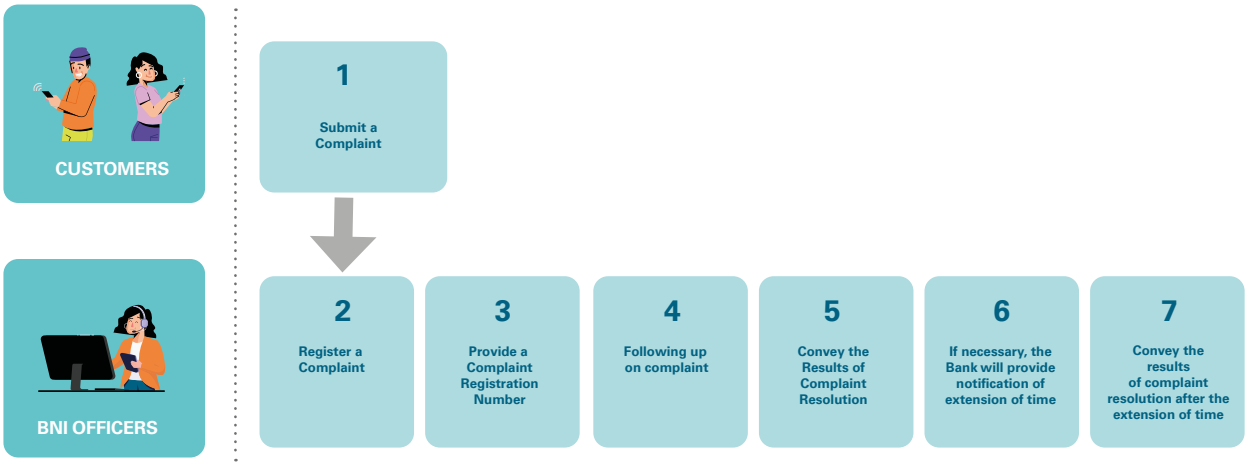
BNI's Customer Experience Center serves as the primary manager of customer complaints, prioritizing prompt responses, empathy, and appropriate resolution in accordance with service-level agreements (SLA). Every complaint received is followed up professionally to ensure sustained customer satisfaction and trust. The complaint-handling service covers a wide range of products and customer segments — including banking services, credit cards, merchants, trade and remittance, and wholesale services. BNI also provides various easily accessible complaint channels, both verbal and written, through multiple communication platforms so customers can submit complaints quickly, conveniently, and efficiently.

Mechanism for Submitting Customer Complaints

BNI is committed to finding the best solution for every customer complaint as part of its effort to maintain an optimal customer experience. In line with OJK Regulation No. 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, the Customer Experience Center is committed to providing resolutions for complaints submitted verbally within a maximum of five (5) business days from the date the complaint is received. For written complaints, resolution is provided within a maximum of ten (10) business days from the date the complete documentation is received, and may be extended for an additional ten (10) business days. Customers are notified of any extension via SMS, telephone, email, letter, or WhatsApp.



Complaint Submission and Resolution Flow



If customers are dissatisfied with the response or solution provided by BNI, they may proceed with dispute resolution through an Alternative Dispute Resolution Institution (LAPS) listed in the Register of LAPS for the Financial Services Sector as determined by the Financial Services Authority (OJK). LAPS functions as an independent institution that facilitates fair and efficient dispute resolution between customers and the Bank outside the court process. This mechanism is in line with Article 82 of OJK Regulation No. 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, which emphasizes the importance of transparent dispute resolution that prioritizes customer interests.

Integrity of Reporting and Information Technology Systems

Integrity in reporting and information technology systems serves as a fundamental pillar for BNI in ensuring transparency of both financial and non-financial information for all stakeholders. BNI consistently prepares reports in accordance with the requirements of the Financial Services Authority (OJK), ensuring that all disclosed information is accurate, comprehensive, and reliable.

Throughout 2025, BNI strengthened reporting integration through the Enterprise Data Platform, implementing a Big Data–based single source of truth concept. For Non-Regulatory report (NRR), all management reports are available on dashboard platforms connected to the Data Governance Framework and Data Quality Monitoring, utilizing Big Data as the single source of truth. Meanwhile, Regulatory Report (RR) is supported by Big Data and enhanced Master Data Management (MDM) to ensure consistency, validity, and regulatory compliance.

As part of its commitment to transparency, BNI safeguards transparency of products and the use of customer data in accordance with applicable regulations. Financial and sustainability reports are prepared in an integrated manner, encompassing historical performance, risk analysis, opportunities, and future outlook. Robust IT systems ensure data security, availability, and efficient access, while protecting information integrity from potential threats.

In line with POJK No. 17 Tahun 2023, BNI ensures reliable internal reporting governance through the implementation of transparency, accountability, independence, and fairness principles, while supporting effective governance oversight by the Board of Directors and the Board of Commissioners. In parallel, consistent with POJK No. 11/POJK.03/2022, BNI implements IT governance that covers IT strategy, risk management, data security, and monitoring of information-system performance. The Board of Directors also actively promotes the development of technological infrastructure and digital innovation to support effective decision-making and oversight, strengthen competitiveness, ensure regulatory compliance, and continuously enhance corporate governance.

Insider Trading and Conflict of Interest Policy [ACGS C.5.1, B.A.6]

BNI maintains a firm stance and has in place strict policies to prevent insider trading and conflicts of interest, ensuring integrity and transparency in all banking activities. This policy is designed to prevent the misuse of internal information and decision-making influenced by personal interests. All BNI Hi-Movers, including employees, the Board of Directors, and the Board of Commissioners, are strictly prohibited from using material, unpublished information for personal gain in any form. Until 2025, there will be no insider trading involving the Company's directors/commissioners, management, or employees. Furthermore, every individual is required to publicly report any situation that could give rise to a conflict of interest, to ensure that all business decisions remain objective and grounded in professional ethics.

Guidelines related to insider trading are stipulated in the Company Guidelines for Prohibited and Non-Prohibited Securities Transactions for Insiders No. IN/500/KMP/001 dated September 23, 2019, which specifically regulates the prohibition on the direct or indirect use of inside information for personal gain, based on information that is not or has not yet been made available in the market. Meanwhile, policies for handling conflicts of interest are regulated in the Company Guidelines for Handling Conflicts of Interest No. IN/013/CMP/004 dated May 9, 2025. These two guidelines are designed to ensure that all business actions and decisions are free from personal influence or conflicts of interest that could be detrimental to the Bank. Furthermore, the Bank regularly reminds all relevant Divisions and Units of the Bank's obligations as a Public Company regarding Disclosure of Material Information or Facts, Affiliated Transactions, and Conflict of Interest Transactions. [ACGS C.5.1, B.A.6]

To prevent conflicts of interest, all BNI Hi-Movers are required to do the following:

1. Prioritize the Bank's Interests.
    a. Serve all Bank stakeholders in accordance with their respective duties and responsibilities;
    b. Carry out duties in accordance with applicable regulations and policies, without prioritizing personal interests or those of affiliated parties, including religion, profession, political party, or ethnicity, and avoid anything that could give rise to a conflict of interest;
    c. Prohibit personal interests from being included in decision-making or actions that could affect the quality of those decisions or actions;
    d. Not to provide preferential treatment to certain parties by ignoring applicable procedures or provisions;
    e. Not to seek or accept improper benefits that could influence the performance of duties;
    f. If a conflict of interest occurs, BNI Hi-Movers must prioritize the Bank's economic interests and prevent the Bank from suffering losses or potential reductions in profits;
2. Creating Transparency in Handling Conflicts of Interest
    a. Transparency is necessary so that conflicts of interest can be controlled and handled appropriately;
    b. BNI Hi-Movers facing a conflict of interest situation are required to disclose any personal interests or affiliated relationships that could potentially give rise to a conflict of interest;

3. Encouraging Personal Responsibility and Exemplary Behavior
   a. BNI Hi-Movers must maintain credibility and integrity to serve as role models for others;
   b. Separating personal matters from Bank matters to avoid conflicts of interest that could harm or reduce the Bank's profits;
   c. BNI Hi-Movers are required to prepare an annual statement regarding conflicts of interest and strive to avoid all forms of potential conflicts of interest in carrying out their duties.
4. Creating an Anti-Conflict of Interest Culture
   a. The Bank is required to issue an annual public statement prohibiting BNI Hi-Movers from accepting gifts or presents from customers, business partners, vendors, and other parties;
   b. Conducting continuous outreach regarding conflicts of interest must be conducted to raise awareness and build an anti-conflict of interest culture, as well as to encourage BNI Hi-Movers to proactively report any indications of conflicts of interest through internal complaint channels.
5. Enforcing the Conflict of Interest Policy
   BNI Hi-Movers found to have violated provisions related to conflicts of interest will be subject to sanctions in accordance with applicable Bank regulations.

Policies and procedures related to conflicts of interest have been consistently implemented and serve as guidelines for all levels of the Board of Directors, Board of Commissioners, management, employees, and other related parties. Over the past three years, BNI has confirmed that there have been no cases of insider trading involving the Board of Directors, Board of Commissioners, management, or employees. This statement reflects BNI's commitment to implementing GCG practices, ensuring transparency, and maintaining the integrity of the capital market and the trust of stakeholders.

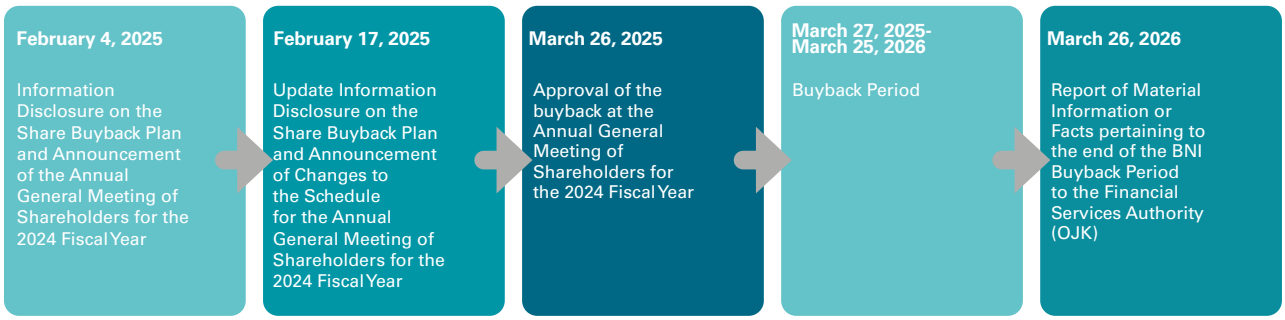
Buyback of Shares and Bonds

From March 2025 to December 31, 2025, BNI did not conduct any share buybacks.

This program is in accordance with Financial Services Authority Regulation No. 29 of 2023 (POJK 29/2023) concerning Share Buybacks by Public Companies.

In accordance with Article 9 of POJK 29/2023, the buyback must be completed no later than 12 (twelve) months after the date on which the GMS approves the buyback. Therefore, in this case, BNI can implement the Share Buyback within 12 (twelve) months from the date of the resolution of the Annual GMS for the 2024 Financial Year, which will be held on March 26, 2025, or must be completed no later than March 25, 2026.

Timeline Buyback



Based on the resolutions of the Annual General Meeting of Shareholders (AGMS) held on 26 March 2025, shareholders approved the buyback of the Company's outstanding shares listed on the Indonesia Stock Exchange, with a maximum value of IDR1,500,000,000,000 (one trillion five hundred billion rupiah), inclusive of all costs related to the buyback. The buyback will be conducted in accordance with applicable licensing requirements and prevailing laws and regulations.

Shares purchased through the buyback will be allocated to the share ownership program for employees, members of the Board of Directors, and members of the Board of Commissioners, as part of the implementation of long-term, performance- and risk-based compensation. This policy is aligned with Financial Services Authority Regulation No. 45/POJK.03/2015 concerning Governance in Remuneration for Commercial Banks, and Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.

The buyback program is also intended to help stabilize the Company's share price in the market — particularly during periods of selling pressure driven by fluctuations in the stock price index — while providing a positive signal to investors that BNI's share price does not yet fully reflect the Company's underlying performance fundamentals.

Internal Fraud [ACGS C.5.1]

With the continued growth of the organization, there is an increased potential exposure to fraud risk, including fraud originating from within the Bank. Internal fraud at BNI is defined as intentional actions, either through direct acts or omission, aimed at deceiving, manipulating, or harming the Bank, customers, or other parties, carried out by utilizing the Bank's facilities, systems, or resources. Such actions may cause financial losses to the Bank or related parties while providing unlawful benefits to perpetrators or other parties.

Fraud may occur in various forms, including data manipulation, asset misappropriation, abuse of authority, information leakage, and manipulation within business and operational processes. BNI views fraud as a serious threat to integrity and business sustainability; therefore, fraud prevention and control represent an integral part of governance and risk-management implementation across the organization.

Anti-Fraud Policy

To foster a culture of compliance and strengthen awareness of fraud risk at every organizational level, BNI applies an Anti-Fraud Framework as part of the Bank's internal control system. BNI's Anti-Fraud Policy refers to OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions, serving as the main guideline for preventing, detecting, and handling fraud incidents.

BNI Management reiterates its commitment to firmly enforce consequences for every violation without exception, including legal processes for internal perpetrators. This commitment is aligned with the "Tone from the Top" principle and BNI's "Zero Tolerance to Fraud" policy, reflecting the Bank's strong stance against all forms of fraudulent activity.

To strengthen understanding and awareness, BNI continuously implements education, socialization, and competency-development programs to ensure that employees fully understand the implementation of the Anti-Fraud Strategy.

Categories of Fraud

Referring to OJK Regulation 12/2024, BNI classifies acts of fraud as follows:

1. Corruption, including:
   a. Conflicts of interest resulting in losses to the Bank and/or customers;
   b. Bribery;
   c. Unlawful receipt of benefits; and/or
   d. Extortion.
2. Asset misappropriation, including:
   a. Misuse of cash;
   b. Misuse of inventory; and/or
   c. Misuse of other assets.
3. Financial statement fraud, including:
   a. Overstating net assets and/or income; or
   b. Understating net assets and/or income.
4. Fraudulent acts;
5. Disclosure of confidential information; and/or
6. Other actions deemed equivalent to fraud in accordance with laws and regulations.

Active Management Oversight Against Fraud

BNI Management plays an active role in overseeing the implementation of the Anti-Fraud Policy across the organization through consistent and measurable supervision. Throughout 2025, oversight included periodic evaluations of systems and procedures, intensive internal audits, and the use of analytics technology to monitor transactions and detect potential fraud in real time. In addition, BNI implemented training programs for management and employees to ensure all parties understand the importance of compliance with anti-fraud policies.

As a form of commitment to the implementation of GCG, all BNI personnel — from the Board of Directors and Board of Commissioners to all employees — have signed the Integrity Pact in compliance with OJK Regulation No. 12 of 2024. Through this pact, all parties are committed to upholding integrity, rejecting all forms of fraud, and complying with BNI's Code of Ethics and Code of Conduct.

Furthermore, BNI emphasizes to its business partners the importance of anti-fraud principles, integrity culture, and reporting mechanisms through the Whistleblowing System. Fraud prevention efforts are also implemented by urging all business partners and associates to refrain from accepting bribes. This measure is taken to minimize the risk of fraud, bribery, and corruption, and to ensure business partners' trust in BNI is maintained.

Implementation of the Anti-Fraud Strategy

BNI has implemented the Anti-Fraud Strategy in accordance with OJK Regulation No. 12 of 2024 on the Implementation of Anti-Fraud Strategies across all levels of the organization. The implementation of this strategy also reflects BNI's commitment to upholding sound governance principles. Successful execution of the Anti-Fraud Strategy is supported by the development of a comprehensive internal control system, the strengthening of integrity culture, and the enhancement of mechanisms for fraud prevention, detection, investigation, and reporting — all aimed at maintaining stakeholder trust and ensuring the Bank's business sustainability.

The strategy is implemented through four pillars using a three-lines model framework. so that each line has its own role in each pillar.

1. **Pillar 1 – Prevention**
   Activities /tools designed to prevent and reduce potential fraud risks in banking business activities, through:
   a. Strengthening an anti-fraud culture to raise awareness of the importance of fraud prevention for all levels of the bank organization and various parties connected to the bank through the signing of an integrity pact as a form of anti-fraud commitment, socialization of the anti-fraud culture by the leadership, strengthening integrity through work culture transformation and the establishment of BNI Habits, enhancing capabilities through training and learning, as well as facilitating access to regulations, and providing financial literacy to customers/ debtors/third parties through the bank's facilities/media.
   b. Identifying vulnerabilities through assessing potential operational risks, including the risk of fraud in new products or activities, and implementing risk assessments through the implementation of Process-Risk-Control-Monitoring (PRCM) by the first line of defense.
   c. Strengthening the implementation of KYE, supported by background checks during recruitment, monitoring employee profiles through the Employee Watchlist application, and ongoing oversight of irregularities.

2. **Pillar 2 – Detection**
   Measures to identify and uncover fraud more quickly so that the level of loss can be reduced, through:
   a) Complaint handling policies and mechanisms through the Whistleblowing System (WBS). This WBS program guarantees protection of the confidentiality of whistleblower data.
   b) Transaction activity monitoring through the Fraud Detection System (FDS), which has the ability to effectively detect and prevent various types of fraud.
   c) Surprise audits
   d) Surveillance system
   e) Data/information security monitoring system

3. **Pillar 3 – Investigation, Reporting, and Sanctions**
   These are steps for investigation, reporting, and witnessing fraud incidents, through:
   a) Collecting relevant evidence related to incidents suspected of being fraudulent.
   b) An effective reporting mechanism for fraud investigations to internal parties and regulators.
   c) Providing a deterrent effect on fraud incidents through a single sanction for fraud perpetrators and a legal assessment mechanism for fraud incidents.

4. **Pillar 4- Monitoring, Evaluation, and Follow-up**
   These are steps for monitoring, evaluating, and following up on fraud incidents. Monitoring, evaluating, and following up on fraud incidents, whether in terms of systems, procedures, or people, is part of the active oversight activities of the Board of Directors and Commissioners through Board of Commissioners Meetings, Board of Directors Meetings, or Committees under the Board of Commissioners or Board of Directors.

In 2025, BNI's Anti-Fraud Strategy focuses on strengthening the four Anti-Fraud Strategy Pillars, with particular emphasis on continuous reinforcement of the Prevention and Detection Pillars, including the following initiatives:

1. Strengthening an anti-fraud culture to maintain employee integrity, by promoting an anti-fraud culture directly from management, enhancing capabilities through training/learning, and providing financial literacy to customers/debtors/third parties through the Bank's facilities/media.
2. Strengthening the implementation of KYE, supported by background checks during recruitment, monitoring employee profiles through the Employee Watchlist application, and continuous monitoring of irregularities.
3. Strengthening outlet detection through enhanced supervision supported by detection tools, conducting periodic cash and securities inspections, and sending anomaly data to support the review process.
4. Monitoring transaction detection through the Fraud Detection System (FDS).

Anti-Fraud Socialization Programs

BNI continuously implements mitigation measures to prevent employees from engaging in violations or fraud. These efforts are carried out through ongoing socialization and awareness programs targeted at all BNI Hi-Movers, customers, debtors, business partners, and counterparties. Anti-fraud communication is delivered using various methods and channels, including in-person sessions, virtual sessions, e-Learning, as well as internal communication media such as email blasts, internal bulletins, desktop wallpapers, and posters. This approach is designed to reach all layers of the organization — as well as customers, debtors, partners, and counterparties — to ensure that every individual clearly understands their responsibility in preventing fraudulent acts.

In 2025, BNI conducted anti-fraud socialization and campaign programs targeting not only BNI Hi-Movers, but also customers, debtors, business partners, and counterparties. These programs are intended to ensure that all stakeholders understand their respective roles and responsibilities in fostering an environment of integrity and a zero-tolerance stance toward fraud.

Internal Fraud Data 2023–2025

The following table summarizes internal fraud incidents at BNI for 2023–2025

Internal Fraud	Number of Cases Committed by								
	Members of the Board of Directors and Board of Commissioners			Permanent Employees			Non-Permanent Employees and Outsourced Workers		
	2025	2024	2023	2025	2024	2023	2025	2024	2023
Resolved	0	0	0	11	14	11	2	2	0
In Process of Internal Bank Resolution	0	0	0	1	0	0	0	0	0
Resolution Not Yet Attempted	0	0	0	0	0	0	0	0	0
Legally Followed Up	0	0	0	1	5	3	0	0	0
Total Fraud	0	0	0	12	14	11	2	2	0

Note:
* The number of cases as of December 2025, with potential losses > 100 million;
** The number of fraud cases that have been followed up through legal proceedings is not included in the total fraud.

For internal fraud incidents that occurred and were reported during 2025, BNI imposed firm sanctions, including termination of employment for employees proven to have committed fraud, as well as administrative sanctions imposed on relevant personnel in accordance with the severity of the violation.

Long-Term Performance-Based Compensation Policy [ACGS: B.6.3]

BNI implements a long-term, performance-based compensation policy as a form of appreciation for the contributions of management and employees, while also ensuring the company's sustainable performance. This program is implemented through a stock ownership scheme, namely the Management Stock Ownership Program (MSOP) and Employee Stock Allocation. Independent Commissioners receive cash compensation. This policy aims to encourage sustainable performance and align employee interests with the Bank's objectives. [ACGS B.6.3]

Share Ownership Program Policy by the Board of Directors and Non-Independent Commissioners

The Long-Term Compensation Policy for Non-Independent Directors and Board of Commissioners through Management Ownership Program is guided by POJK No. 45/2015 and SOE Ministerial Regulation No. 3/2023. In accordance with POJK No. 45/2015 Articles 17 and 18, variable remuneration for members of the Board of Directors and Non-Independent Board of Commissioners who have gone public status is given in the form of shares or stock-based instruments of BNI (BBNI), while Independent Commissioners can receive conversion in cash.

Variable remuneration in the form of bonuses is deferred and provided in the form of shares. Article 107 of the Minister of State-Owned Enterprises Regulation No. 3/2023 requires a minimum payment deferral of 10% for a minimum of three years, provided on a pro rata basis. SOEs may defer part or all of the bonus payments (malus) or withdraw the cash bonuses already paid (clawback) under certain conditions determined by the Minister.

The long-term compensation policy for members of the Board of Directors and Independent Commissioners is designed to prioritize prudence in managing the bank. This policy aims to reduce the risk of excessive risk-taking by decision-makers and supports the implementation of a performance-based remuneration system.

The implementation of the stock ownership program policy for the Board of Directors and Board of Commissioners will be carried out based on policies and determinations from Danantara.

Eligibility Requirements for the Board of Directors and the Board of Commissioners

BNI may provide bonuses or performance incentives to members of the Board of Directors and Board of Commissioners based on the General Meeting of Shareholders› approval of the annual report if:

1. The auditor's opinion is Unqualified (WTP);
2. The realized health level is at least BBB without considering losses/profits due to the prior actions of BNI's Board of Directors and/or outside their control;
3. The KPI achievement is at least 80%, excluding factors outside the control of BNI's Board of Directors; and
4. BNI is not in a worse financial condition than the previous year if BNI is in a loss, or BNI does not turn from profit to loss, excluding factors outside the control of BNI's Board of Directors.

These requirements are consistent with the provisions set forth in Ministry of SOE Regulation No. 3/2023, article 102.

Provision of Deferred Bonuses in the Form of Shares

The following table presents detailed information regarding the Deferred Tantiem in the Form of Shares to Non-Independent Members of the Board of Directors and Board of Commissioners of BNI:

Date of GMS	Date of Provision of Deferred Bonuses	Total Number of Shares*	Duration Exercise	Price (average price per share)	Vesting Period	Policy
March 20, 2018	June 28, 2019	1,444,546	3 year	IDR8,275	June 5, 2019 June 5, 2020 June 5, 2021	Malus
May 13, 2019	November 9, 2020	950,377	3 year	IDR8,400	June 5, 2020 June 5, 2021 June 5, 2022	Malus
February 20, 2020	December 22, 2020	5,071,900	3 year	IDR6,630	June 5, 2021 June 5, 2022 June 5, 2023	Malus
March 29, 2021	December 30, 2021	5,724,673	4 year	IDR4,057	June 5, 2022 June 5, 2023 June 5, 2024 June 5, 2025	Malus
March 15, 2022	July 29, 2022	3,001,097	3 year	IDR5,187	June 5, 2023 June 5, 2024 June 5, 2025	Malus and Clawback
March 15, 2023	August 14, 2023	1,816,099	3 year	IDR9,037	June 5, 2024 June 5, 2025 June 5, 2026	Malus and Clawback
March 4, 2024	May 13, 2024	12,778,954	3 year	IDR4,826.33*	June 5, 2025 June 5, 2026 June 5, 2027	Malus and Clawback

*) Notes: price and total shares after the implementation of 1:2 stock split effective on October 6, 2023.
Throughout 2025 there was no Malus and Clawback exercise

Long Term Incentives (LTI)

According to the regulations, Long Term Incentives (LTI) are granted for the following reasons and purposes:

1. Aligning the interests of the SOE's management between the Board of Directors, the Board of Commissioners/Supervisory Board, and shareholders/capital owners;
2. Providing motivation to further improve future performance;
3. Providing rewards for efforts to maintain and/or increase share value in the long term, even under unfavorable conditions for the SOE; or
4. Encouraging SOEs to become world-class companies.

If a SOE has achieved its performance targets or threshold, the Board of Directors and the Board of Commissioners/Supervisory Board of the SOE will receive LTI.

The LTI becomes vested, with the amount corresponding to the LTI Final Award.

The LTI Final Award is awarded based on the total average achievement of the SOE's performance targets multiplied by the Initial Award and can be awarded immediately after the completion of the financial report audit and the Annual General Meeting of Shareholders in the following year.

Final Award and Holding Period [ACGS D.3.13]

1. The final award is the final amount of LTI in the form of a number of the company's shares or cash from awards given to members of the Board of Directors and Board of Commissioners, based on the total achievement of the agreed SOE performance targets during a certain time period.
2. LTI vested after the performance measurement period will be subject to a holding period of 2 years for members of the Board of Directors and Non-Independent Board of Commissioners who serve during that period, with the following conditions:

Keterangan	Holding Period		Setelah Holding Period
	Tahun I	Tahun II	
Total number of shares available for sale	Max. 25%	Max. 50%	Max. 100%

3. The holding period is not imposed on the Board of Directors and Non-Independent members of the Board of Commissioners whose term of office has ended.
4. For members of the Board of Directors and Board of Commissioners whose term of office ends before 3 (three) years, LTI will be calculated proportionally based on the length of service in the performance period (calendar days) and the average performance achievement over 3 (three) years.

The following table presents detailed information regarding the Allocation of Long-Term Incentives (LTI) in the form of Shares to Non-Independent Members of the Board of Directors and Board of Commissioners of BNI:

Date of GMS	Tanggal Penetapan Alokasi Long Term Incentives	Total Shares	Time Period	Determination Price*	Vesting Period	Policy
March 15, 2023	December 15, 2023	15,637,000	3 Year	IDR 4,704	2027 2028 2029	Malus and Clawback
March 4, 2024	November 5, 2024	27,581,400	3 Year	IDR 4,593	2028 2029 2030	Malus and Clawback

*) The determination price is the Fair Value price of the Independent Consultant.

The implementation of the stock ownership program policy for the Board of Directors and Board of Commissioners will be carried out based on policies and determinations from Danantara.

Employee Stock Ownership Program

The Employee Stock Ownership Program at BNI, known as the Employee Stock Allocation (ESA) program, is a stock allocation program for employees who meet certain criteria and requirements as outlined in the Program Implementation Guidelines.

The objectives of the ESA program are:
1. A long-term employee retention strategy;
2. An effort to motivate employees to consistently deliver their best performance, thereby improving BNI's performance and ultimately enhancing BNI's stock price;
3. Enhancing employees' sense of ownership toward BNI;
4. As part of the enhancement of employees' risk awareness, reflected in eligibility and the lock-up period.

The resolutions of the General Meeting of Shareholders (GMS) on March 15, 2022, approved the delegation of authority for the implementation of the Employee Stock Ownership Program, both from treasury stock and other sources, to the Board of Directors, while adhering to applicable laws and regulations.

Eligible Employee Requirements

Employees who are entitled to receive vesting allocations and opening lock-up periods in the Employee Stock Allocation (ESA) Program must meet the following requirements:
1. Have status as a permanent employee as of December 31, 2021, and still be active at the time of vesting allocation and opening of the ESA Program lock-up period;
2. Have a minimum term of office of 1 (one) year at the time of granting the ESA Program vesting allocation;
3. Have a performance assessment and employee classification in accordance with the provisions when granting vesting allocations and opening the lock-up period of the ESA Program;
4. Not currently undergoing administrative sanctions.

Participants who are eligible for allocation, vesting, or opening of the lock-up period will receive notification via email or other communication media. The notification will contain confirmation regarding the shares the participant is entitled to at the time of allocation, vesting, and opening of the lock-up period. In the third stage of opening the lock-up period in 2025, all shares allocated through the Employee Stock Allocation (ESA) Program will be fully distributed to participants.

Mechanism for Distribution of Shares in the Employee Stock Allocation Program (ESA)

The allocation and vesting of shares in the Employee Stock Allocation (ESA) Program began on June 2, 2022, with the application of the lock-up period based on job level:

- Assistant Vice President (AVP) and above: lock-up period of 3 (three) years. (final lock up opening in 2025).
- Manager (MGR) and below: lock-up period of 1 (one) year.

During the lock-up period, participants in the ESA Program are not permitted to engage in any activity with the shares that have become their entitlement. This policy is implemented as part of a long-term retention strategy and to motivate employees to continuously improve performance.

The unlocking of the lock-up period occurs annually, when participants are allowed to use or trade shares that have become their entitlement. However, participants must meet the criteria and requirements outlined in the ESA Program Implementation Guidelines.

The lock-up period for Manager (MGR) and below will be opened all at once on June 2, 2023, while for Assistant Vice President (AVP) and above, the lock-up period will be opened in stages over three periods on June 2, 2023, 2024, and 2025.

Details of the Employee Stock Allocation Program (ESA) Grant

The details of the Employee Stock Allocation (ESA) grant to employees are outlined in the following table:

Date of GMS	Allocation andVesting Dates	Total Shares	Price per Share	Opening of Lockup Period
March 15, 2022	June 2, 2022	53,839,984*	IDR 8,850*	June 2, 2023
		23,147,202	IDR 4,400*	June 2, 2023
		25,475,142	IDR 4,370*	June 2, 2023

*) Price and total number of shares at the opening of the lock up period on June 2, 2023 above, before the implementation of the 1:2 stock split which will only be effective on October 6, 2023

Distribution of Shares for Employees Who Are Material Risk Takers (MRT)

In implementing the provision of Remuneration, BNI is obliged to determine parties who are Material Risk Takers (MRT) who at least meet the following criteria:

a. The Board of Directors and/or other employees who, due to their duties and responsibilities, make decisions that have a significant impact on BNI's risk profile; or
b. The Board of Directors, Board of Commissioners, and/or Employees who receive Variable Remuneration with a large value.

Based on the Resolution of the Board of Directors Meeting, on December 20, 2016, BNI has implemented Governancein providing remuneration by determining employees who meet the criteria for MRT, namely employees at the Senior Executive Vice President (SEVP) level. BNI is also obliged to defer the payment of variable remuneration to SEVP-level employees as parties who are MRT, namely at a certain percentage in accordance with the percentage for the Board of Directors.

In the 2023 annual performance bonus payment for SEVP-level employees, which is paid in 2024, 20% of the annual bonus is given in the form of deferred company shares (Malus). These shares come from direct purchases on the market, with the purchase period starting from May 3, 2024, to May 17, 2024.

All provisions relating to Material RiskTakers (MRT) are in accordance with the provisions stipulated in POJK No. 45/2015.

Distribution of Shares of Performance Stock Bonus Program

In order to improve savings performance, Management will provide rewards as a performance booster to increase savings growth in 2024 in the form of a share ownership program for managerial- level employees and the smallest Unit Manager (Sub Branch Manager) who meet the specified criteria, with the share allocation given to increase savings performance called the Performance Stock Bonus.

Eligible Employee Requirements

Employees who are entitled to receive vesting allocations and opening lock-up periods in the Performance Stock Bonus Program must meet the following requirements:

1. Permanent employees as of February 29, 2024; and
2. Have a 2023 performance assessment of at least Tier 3; and
3. Not currently in the process of a case/undergoing the impact period of Administrative Sanctions; and
4. Not currently undergoing a retirement preparation period/sick leave/non-dependent leave; and
5. The definitive position levels and definitive positions are as follows:
   a. MGR and above in all positions, except Staff positions/Staff Waiting for Placement/ Employees Placed in other Companies outside the BNI Group; or
   b. AMGR in the positions of Branch Business Manager (BBM), Branch Service Manager (BSM), and Sub Branch Manager Head.

Participants who are eligible for allocation, vesting, or opening of the lock-up period will receive notification via email or other communication media. The notification will contain confirmation of the shares the participant is entitled to at the time of allocation, vesting, and opening of the lock-up period.

Share Distribution Mechanism for Performance Stock Bonus Program

The allocation and vesting of shares under the Performance Stock Bonus Program will take place on April 25, 2024. During the lock-up period, Program participants are not permitted to conduct any transactions or activities on their vested shares. This policy is implemented to encourage the active participation of all employees, particularly those at the managerial level and Sub-Branch Managers, in supporting BNI's 2025 performance targets, including savings and other performance targets. This program aims to ensure sustainable performance and motivate employees to consistently increase their contributions.

Details of the Performance Stock Bonus Program Provision

Details of the provision of the Performance Stock Bonus Program to employees are described in the following table:

Date of GMS	Allocation andVesting Dates	Total Shares	Price per Share	Opening of Lockup Period
March 25, 2023	April 25, 2024	24,877,600	IDR 4,442	To support performance culture and motivate performance, particularly Savings performance, the lock-up period can be opened sooner, provided the Savings target is achieved, or no later than one year after the allocation and vesting date. The Performance Stock Bonus Program lock-up period was opened on April 14-17, 2025.

Policy for Disclosure of Information on Share Ownership of the Board of Commissioners and the Board of Directors and its Implementation

POLICY FOR DISCLOSURE OF INFORMATION ON SHARE OWNERSHIP OF THE BOARD OF COMMISSIONERS AND THE BOARD OF DIRECTORS [ACGS C.1.3]

Transparency in share ownership by members of the Board of Directors and the Board of Commissioners is crucial to maintaining public trust while ensuring compliance with capital market regulations. As a company listed on the Indonesia Stock Exchange, BNI is subject to Financial Services Authority Regulation No. 4 of 2024 concerning Reports on Share Ownership or Changes in Share Ownership of Public Companies, as well as Reports on Pledging Activities of Public Company Shares.

Article 2 of the POJK states that members of the Board of Directors or members of the Board of Commissioners who own shares with voting rights either directly or indirectly are required to submit a report on ownership of voting rights over shares and any changes in ownership of voting rights over Public Company shares to the OJK. The report must be submitted immediately no later than 5 (five) working days from the occurrence of ownership of voting rights on shares or any change in ownership of voting rights on shares of a Public Company. [ACGS C.1.3]

In addition to reporting obligations to the Financial Services Authority (OJK), members of the Board of Directors and Board of Commissioners are also required to report ownership and any changes in shareownership of public companies to BNI. Submission of this information must be made no later than 3 (three) working days after the ownership or change in ownership of the shares occurs. Members of the Board of Directors and Board of Commissioners are required to submit the report to the Corporate Secretary. This reporting obligation is stipulated in the Board of Commissioners' Decree No.KEP/ 017/DK/2025 dated September 19, 2025 concerning the Charter of the Board of Commissioners of PT Bank Negara Indonesia (Persero) Tbk, as well as the Board of Directors' Decree No. KP/339/DIR dated August 6, 2024 concerning the Charter of the Board of Directors of PT Bank Negara Indonesia (Persero) Tbk, which was last updated on January 28, 2026 and can be accessed through the official BNI website. [ACGS A.7.1]

POLICY IMPLEMENTATION IN 2025

Throughout 2025, there have been changes in BNI share ownership by non-independent members of the Board of Directors and Board of Commissioners, all of which have been reported to the OJK using procedures and mechanisms in accordance with applicable regulations.

SHARE OWNERSHIP OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS AT BNI [ACGS C.5.1]

The detailed report on changes in share ownership by the Board of Commissioners and Directors in 2025 is presented in the following table:

Share Ownership						
Name	Position	As of January 1, 2025	As of December 31, 2025	Transaction Description	Number of Shares	
BOARD OF COMMISSIONERS						
Omar Sjawaldy Anwar	General Insurance	-	0 Shares (0 %)	-	-	
Tedi Bharata	Vice President Commissioner	-	0 Shares (0 %)	-	-	
Suminto	Commissioner	-	0 Shares (0 %)	-	-	
Donny Hutabarat	Commissioner	-	200 Shares (0.000005 %)	Purchase of Shares (Prior to serving at BNI, already owned 4,300,200 shares (0.0115295%))	- 200,000 shares - 300,000 shares - 200,000 shares Total purchase of 700,000 shares	
				Stock Purchase	- 350,000 shares - 900,000 shares - 500,000 shares - 950,000 shares - 2,102,700 shares - 197,300 shares Total sales of 5,000,000 shares	
Vera Febyanthy	Independent Commissioner	-	0 Shares (0 %)		-	
Didik Junaidi Rachbini	Independent Commissioner	-	0 Shares (0 %)	-	-	
BOARD OF DIRECTORS						
Putrama Wahju Setyawan	President Director	5,997,426 (0.0160800%)	5,997,426 (0.0160800%)	-	-	
Alexandra Askandar*	Deputy Chief Executive Officer	-	0 Shares (0 %)		-	
David Pirzada	Deputy President Director	4,866,684 (0.0130484%)	4,866,684 (0.0130484%)	-	-	
Abu Santosa Sudradjat	Risk Management Director	-	0 Shares (0 %)	-	-	
Muhammad Iqbal*	Treasury & International Banking Director	-	3,064,085 Shares (0.0082153%)	No transactions. Ownership of shares prior to taking office.	-	
Munadi Herlambang	Commercial Banking Director	0 Shares (0 %)	0 Shares (0 %)	-	-	
Corina Leyla Karnalies	Human Capital & Compliance Director	5,513,174 shares (0.0147817%)	5,513,174 shares (0.0147817%)	-	-	
Hussein Paolo Kartadjoemena	Consumer Banking Director	2,807,611 shares (0.0075276%)	3,075,911 shares (0.0082470%)	Stock Purchase	- 243,900 shares - 24,400 shares Total purchase of 268,300 shares	
Ronny Venir	Finance & Strategy Director	5,546,296 shares (0.0148705%)	5,546,296 shares (0.0148705%)	-	-	
Agung Prabowo	Operations Director	1,990,356 shares (0.0053365%)	1,915,356 shares (0.0051354%)	Stock Purchase	75,000 shares	
Eko Setyo Nugroho	Corporate Banking Director	-	311,797 shares (0.0008360 %)	No transactions. Ownership of shares prior to taking office.	-	
Toto Prasetio	Institutional Director	4,170,396 shares (0.0111815%)	4,222,896 shares (0.0113223%)	Stock Purchase	52,500 shares	
Rian Eriana Kaslan	Information Technology Director	-	802,397 shares (0.0021514 %)	No transactions. Ownership of shares prior to taking office.	-	

Description:
* Appointed through the Annual General Meeting of Shareholders for the 2024 Fiscal Year on March 26, 2025, so there is no data or information regarding share ownership as of January 1, 2025.
** Appointed through the 2025 Extraordinary General Meeting of Shareholders on December 15, 2025, so there is no data or information regarding share ownership as of January 1, 2025.

	Perubahan Kepemilikan Saham					
	Tujuan Transaksi	Harga	Tanggal Transaksi	Tanggal Pelaporan kepada BNI	Tanggal Pelaporan kepada OJK	Status Kepemilikan Saham
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	Investment	- IDR4,130 - IDR4,030 - IDR4,210	March 26, 2025	April 11, 2025	April 11, 2025	Directly
	Investment	- IDR4,200 - IDR4,210 - IDR4,230 - IDR4,240 - IDR4,190 - IDR4,200	March 27, 2025	April 11, 2025	April 11, 2025	Directly
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	Investment	- IDR4,100 - IDR4,110	February 28, 2025	March 6, 2025	March 6, 2025	Directly
	-	-	-	-	-	-
	Stock Purchase	- IDR4,160,-	July 29, 2025	July 30, 2025	July 30, 2025	Directly
	-	-	-	-	-	-
	Investment	- IDR3,970,-	March 25, 2025	April 10, 2025	April 10, 2025	Directly
	-	-	-	-	-	-

SHARES OWNERSHIP OF THE BOARD OF COMMISSIONERS AND BOARD OF DIRECTORS IN BANK OR OTHER COMPANIES [ACGS C.1.3]

BNI places the implementation of Good Corporate Governance (GCG) and regulatory compliance as top priorities in safeguarding the Company's integrity and transparency. In support of this commitment, BNI consistently discloses information on share ownership held by members of the Board of Commissioners and the Board of Directors, both in BNI and in other banks, companies, and non bank financial institutions, domestically and internationally. This transparency is intended to ensure that each member of the Board of Commissioners and the Board of Directors continues to carry out their duties and responsibilities independently.

As of December 31, 2025, it is recorded that no member of BNI's Board of Commissioners and Board of Directors owns shares in other banks, non-bank financial institutions, or other companies domiciled at home or abroad. Detailed information is presented in the following table:

Name	Position	Shareholding as of December 31, 2025			
		BNI	Other Banks	Non-Bank Financial Institutions	Other Companies
BOARD OF COMMISSIONERS					
Omar Sjawaldy Anwar	President Commissioner/ Independent Commissioner	0 Share (0%)	-	-	-
Tedi Bharata	Vice President Commissioner	0 Share (0%)	-	-	-
Febrio Nathan Kacaribu*	Commissioner	0 Share (0%)	-	-	-
Donny Hutabarat	Commissioner	200 Shares (0.000005 %)	-	-	-
Vera Febyanthy	Independent Commissioner	0 Share (0%)	-	-	-
Didik Junaidi Rachbini	Independent Commissioner	0 Share (0%)	-	-	-
BOARD OF DIRECTORS				-	-
Putrama Wahju Setyawan	President Director	5,997,426 (0.0160800%)	-	-	-
Alexandra Askandar	Deputy Chief Executive Officer	0 Share (0%)	-	-	-
David Pirzada	Director of Risk Management	4,866,684 (0.0130484%)	-	-	-
Abu Santosa Sudradjat	Direktur Treasury & International Banking	0 Shares (0 %)	-	-	-
Muhammad Iqbal	Director of Commercial Banking	3,064,085 Shares (0.0082153%)	-	-	-
Munadi Herlambang	Director of Human Capital & Compliance	0 Shares (0 %)	-	-	-
Corina Leyla Karnalies	Direktur Consumer Banking	5,513,174 Shares (0.0147817%)	-	-	-
Hussein Paolo Kartadjoemena	Director of Consumer Banking	3,075,911 Shares (0,0082470%)	-	-	-
Ronny Venir	Director of Operations	5,546,296 Shares (0.0148705%)	-	-	-
Agung Prabowo	Director of Corporate Banking	1,915,356 Shares (0.0051354%)	-	-	-
Eko Setyo Nugroho	Director of Institutional Affairs	311,797 Shares (0.0008360 %)	-	-	-
Toto Prasetio	Director of Information Technology	4,222,896 Shares (0.0113223%)	-	-	-
Rian Eriana Kaslan	Director of Network & Retail Funding	802,397 Shares (0.0021514 %)	-	-	-

* Able to carry out actions, duties, and functions after obtaining approval from the OJK's Fit and Proper Test.

Whistleblowing System

EXISTENCE AND PURPOSE OF THE WHISTLEBLOWING SYSTEM (WBS) [ACGS B.7.1]

BNI is committed to implementing Good Corporate Governance principles across all of its activities, one of which is through the WBS. The WBS enables BNI personnel, business partners, and external parties to report suspected violations of laws, the Code of Ethics, or internal policies, including fraud, corruption, conflicts of interest, gratification or bribery, and unethical conduct.

This system is designed to prevent and detect misconduct at an early stage, protect whistleblowers from retaliation, and maintain the trust of stakeholders, including customers, debtors, business partners, employees, and regulators. Through the WBS, BNI strengthens a culture of honesty, transparency, and high integrity, while fostering a conducive and accountable working environment.

COMMITMENT TO THE WHISTLEBLOWING SYSTEM (WBS) [ACGS B.7.1]

BNI is committed to maintaining operational transparency and accountability, strengthening its oversight system, and fostering a productive working environment through the implementation of the WBS known as "WBS to CEO". All WBS reports submitted with relevant data and evidence are followed up in a professional and transparent manner under the supervision of the President Director. To ensure independence, the management of the WBS reporting channels is handled by an external party, Deloitte, while also ensuring the confidentiality of whistleblowers and the proper handling of reported violation.

Since March 2, 2021, BNI has further strengthened its efforts to combat corruption through cooperation with the Corruption Eradication Commission (KPK). Under this collaboration, complaints related to corruption cases submitted through the WBS are reported periodically to the KPK to ensure rigorous oversight and accountability at every stage. This initiative reinforces transparency, integrity, and public trust in BNI's commitment to preventing corrupt practices.

WBS MANAGEMENT

The responsibility for managing the WBS remains under the control of the President Director, with support from the Director of Human Capital & Compliance. Deloitte, as an external independent party, plays a role in providing technical support to ensure that the WBS operates according to the highest standards, while strategic decisions regarding the WBS are made internally by BNI. [ACGS (B).B.1.7]

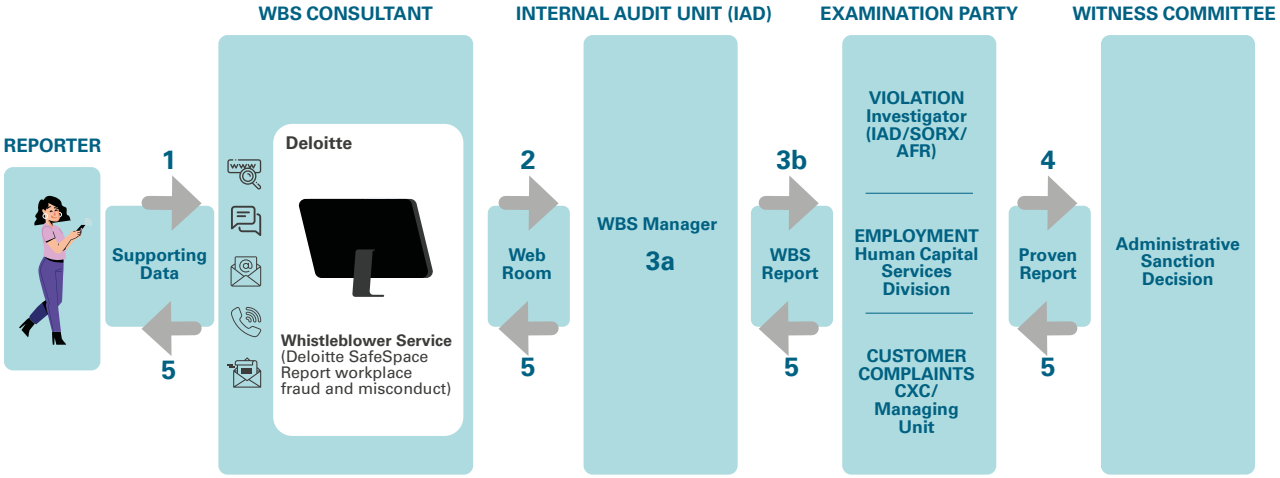
Internally, the management mechanism of the WBS involves the appointment of the Head of Internal Audit by the President Director. The Head of Internal Audit is responsible for managing the entire WBS operational process, from receiving to handling reports. The Head of Internal Audit reports the management outcomes and progress of reports to the President Director on a regular basis, ensuring that each WBS report is handled properly and transparently according to established procedures.

SUBMISSION OF WBS REPORTS [ACGS B.5.1]

To facilitate the reporting process, BNI, through Deloitte, has provided several reporting channels that can be utilized by whistleblowers, as follows:



COMPLAINT REPORTING MECHANISM THROUGH WBS CHANNEL [ACGS B.7.1]



1. Whistleblowers may submit WBS reports via phone, e-mail, letter, website, or SMS/WhatsApp to the WBS Consultant from Deloitte.
   a. Deloitte will screen the WBS report. If the report does not meet the 4W1H criteria (What, Who, Where, When, How), Deloitte will request additional supporting data from the Whistleblower.
   b. The Whistleblower will then provide the requested supporting data to Deloitte.
2. Subsequently, Deloitte will forward the WBS report to the WBS Manager, which is the Internal Audit.
3. Internal Audit will analyze the WBS report and conduct a direct investigation. If necessary, the report will be forwarded to the Senior Operational Risk Executive (SORX), Anti-Fraud Unit (AFR), or the relevant Division/Unit/Unit according to the nature of the report, as follows:
   a. Reports related to violations will be forwarded to the Investigator Unit.
   b. Employee-related issues will be forwarded to the Human Capital Division.
   c. Customer complaints will be forwarded to the Customer Experience Center Division or the Managing Unit.
4. The results of the follow-up actions for WBS reports that are proven to involve violations will result in administrative sanctions in accordance with applicable regulations.
5. Each unit/Division that follows up on a WBS report must submit the results of their actions to Internal Audit, which will then forward the information to Deloitte for communication with the Whistleblower.

PROTECTION FOR WHISTLEBLOWERS [ACGS: B.7.2]

BNI is committed to providing maximum protection and safeguarding every report received. Protection for the Whistleblower is fundamentally a right afforded to them. This aims to ensure the safety of the Whistleblower against any threats or actions that may arise as a consequence of submitting a violation report.

To protect confidentiality and provide maximum protection for Whistleblowers, BNI offers several options for disclosing identity when reporting via the WBS, as follows:

1. The Whistleblower may choose to fully disclose their identity to the WBS Consultant Team and BNI (Full Disclosure).
2. The Whistleblower may disclose their identity only to the WBS Consultant Team without forwarding it to BNI (Partial Anonymity).
3. The Whistleblower has the option to remain completely anonymous, where their identity is unknown both to the WBS Consultant Team and BNI (Full Anonymity).

Nevertheless, in order to safeguard the integrity and accountability of the reporting process, BNI may impose sanctions in accordance with applicable regulations on whistleblowers if it is proven that the report submitted constitutes defamation and is intended for purposes that deviate from the intent and objectives of the Whistleblowing System Policy. Such sanctions are imposed in accordance with the prevailing provisions.

TYPES OF VIOLATIONS THAT CAN BE REPORTED

In accordance with applicable regulations, the types of violations that can be reported through BNI's WBS mechanism include:

1. Fraud
   Fraud refers to dishonest acts or deceitful practices, including, but not limited to, fraud, extortion, forgery, concealment or destruction of documents/reports, and the use of counterfeit documents. These actions may be carried out by individuals or groups and have the potential to cause actual harm or loss to the Bank.
2. Violation of Regulations/Laws
   Acts or deeds that violate the law and are subject to penalties in accordance with applicable legal provisions, whether internal or external.
3. Conflict of Interest
   A situation where members of the Board of Directors, Board of Commissioners, committee members, permanent/non-permanent employees/outsourcing (BNI Hi-Movers) have personal interests that could influence the objective performance of duties entrusted by the Bank. This may result in a conflict between personal, group, or family interests and the Bank's economic interests.
4. Bribery/Gratification/Extortion (Illegal Levies)
   Receiving anything of value, in any form or amount, from a third party related to a position, authority, or responsibility at the Bank.
5. Violation of Code of Conduct/Unethical Behavior
   Acts or conduct performed by BNI Hi-Movers that are ethically unjustifiable, including violations of the Code of Conduct.

In addition, during 2025, BNI's Whistleblowing System also received reports that fell outside the categories of violations described above, including the following:

1. Confidential or Personal Employee Complaints
   Acts or actions committed by BNI personnel, including but not limited to operational activities, such as violations of employee rules and discipline as stipulated in applicable regulations and procedures.
2. Customer Complaints
   Acts or expressions of dissatisfaction or complaints, or notifications accompanied by requests submitted by BNI customers or vendors, as well as other stakeholders, regarding matters requiring attention, unmet rights, or products and service quality that do not meet expectations.

ROLES OF THE BOARD OF DIRECTORS AND BOARD OF COMMISSIONERS IN BNI'S WBS

The Board of Directors and the Board of Commissioners play a strategic role in the implementation and oversight of the operational effectiveness of the Whistleblowing System (WBS) at BNI. The Board of Directors is responsible for formulating, reviewing, and approving WBS policies and procedures, as well as ensuring that the system operates in accordance with the objectives of good corporate governance. In addition, the Board of Directors periodically receives WBS reports covering the number of complaints, handling status, and recommended follow up actions. Based on these reports, the Board of Directors provides direction, input, and strategic decisions to enhance the effectiveness of the system and to ensure that each complaint is handled appropriately and professionally.

Meanwhile, the Board of Commissioners performs its oversight function by regularly reviewing WBS reports submitted through the Audit Committee. Through this process, the Board of Commissioners provides strategic guidance and supervisory direction to ensure that the WBS operates in line with GCG principles, supports corporate integrity, accountability, and transparency, and fosters an ethical and high integrity work culture throughout BNI. Through the synergy between the Board of Directors and the Board of Commissioners, BNI ensures that the WBS serves not only as a reporting mechanism but also as an effective means for the consistent prevention, detection, and handling of violations.

SOCIALIZATION OF WBS IMPLEMENTATION

The socialization of WBS implementation at BNI is carried out comprehensively to ensure that all BNI Hi-Movers understand the importance of this system and the reporting procedures. Various activities such as surveys, training sessions, and distribution of informational materials are employed.

In 2025, the socialization of WBS at BNI was successfully executed, utilizing a more innovative and integrated approach. Various communication platforms were leveraged to deliver clear and comprehensive information regarding the WBS, including its roles, benefits, and reporting procedures. As such, all employees are expected to gain a deeper understanding of the importance of the WBS in fostering a transparent and accountable work environment. This effort also aims to encourage active participation from employees in reporting potential violations, thereby strengthening the culture of integrity at BNI.

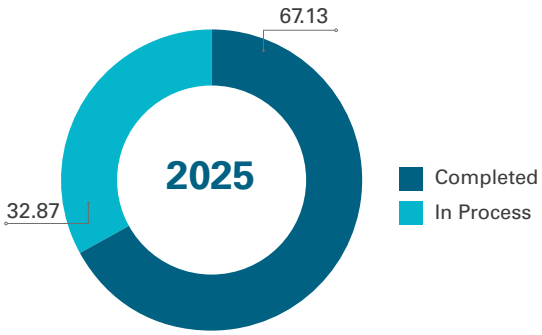
RESULTS OF COMPLAINT HANDLING

Number of Complaints in 2025

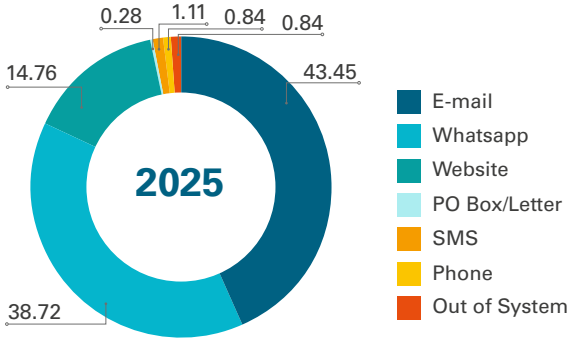
Throughout 2025, a total of 359 reports of alleged violations were received through the Whistleblowing System mechanism. The WBS reports were predominantly comprised of 137 Confidential Employee Complaints, representing 38.16 percent, and 126 Customer Complaints, accounting for 35.09 percent. The most frequently used reporting channel was email, which accounted for 43.45 percent of total reports. The second most utilized channel was WhatsApp, representing 38.72 percent, followed by the website, which contributed 14.76 percent of the total reports.

Of the total complaints received, 67.13 percent or 241 reports were followed up during 2025. Of these, 99 reports were substantiated, while 142 reports were determined to be unsubstantiated.

Report Status
(%)



Complaint Channel
(%)



FOLLOW-UP ON COMPLAINTS IN 2025

Each report received through the Whistleblowing System undergoes a thorough investigation process. If a violation of applicable provisions is substantiated, the reported party is subject to sanctions in accordance with BNI's policies. In 2025, BNI took disciplinary action against 50 employees, including 9 employees who received sanctions ranging from written guidance letters to demotion.

The imposition of these sanctions is intended to enforce compliance with the Bank's ethical and integrity standards, while safeguarding BNI's reputation among all stakeholders. This approach demonstrates BNI's commitment to preventing misconduct, strengthening a transparent and accountable work culture, and fostering a professional environment with high integrity.

Bank Strategic Plan

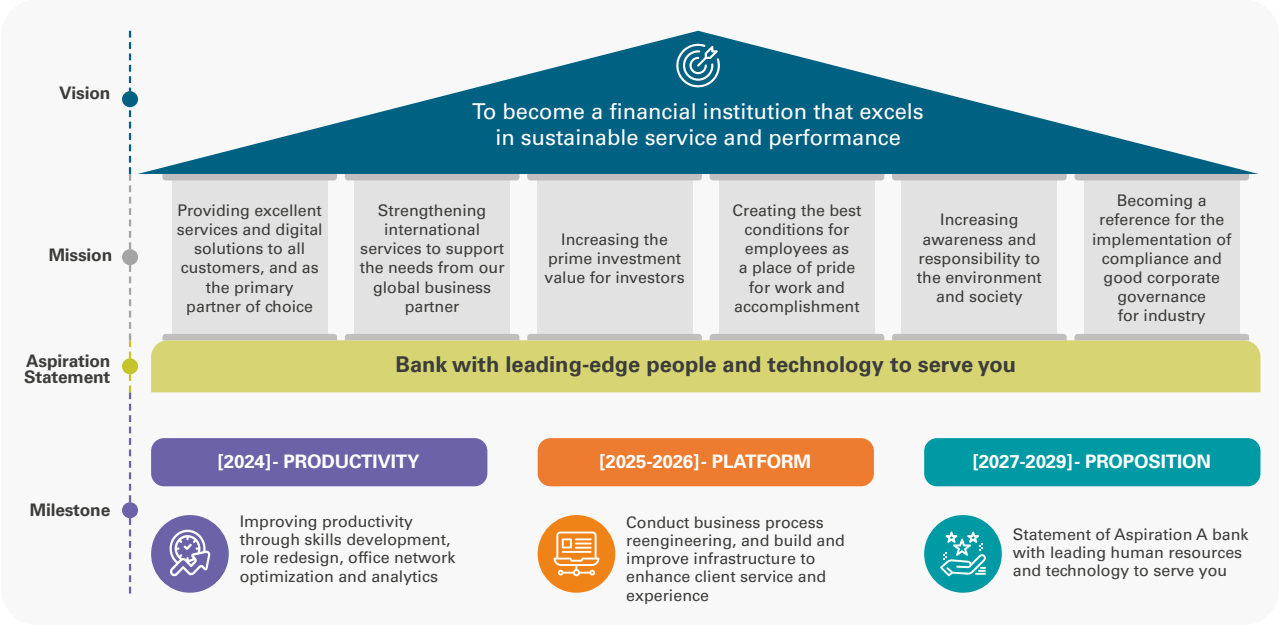
BNI CORPORATE PLAN 2024-2028

The BNI Corporate Plan 2024–2028 was designed holistically with due consideration of growing trends in global and national macroeconomic conditions, the development of the banking industry, and the policy direction of the government and regulators in maintaining financial system stability and promoting sustainable economic growth. This strategic plan offers BNI guidelines for realizing its vision as a leading financial institution in sustainable service and performance, relying on strengthened governance, human resource capabilities, and the integrated use of digital technology.

In 2025, the national economy was projected to grow steadily amidst global uncertainty. Bank Indonesia estimated economic growth in 2025 would be around 4.7%–5.5%, driven by sustained household consumption, government spending, and investment recovery. Relatively stable inflation and a manageable exchange rate contributed to public purchasing power and healthy business climate. That sustained trend should improve through strengthening the productive sector, industrial downstreaming, MSME development, and accelerating digital transformation.

In line with moderate economic growth, the national banking industry faced numerous challenges in 2025, such as an increasingly competitive industry, the need to improve operational efficiency, and market demands for dynamic banking services. Nevertheless, growth opportunities remained open, driven by growing need for financing for the productive sector and MSMEs, the strengthening of the digital financial ecosystem, and the strategic, supportive role of banks in sustainable financing. Such optimism towards the banking industry's prospects was also buoyed ed by the policy direction of the Government and regulators, which have driven banks to strengthen their intermediation function, increase financial inclusion and literacy, accelerate digital transformation, and consistently apply prudential principles and good governance in all business activities.

Responding to these dynamics and in line with the 2024–2028 Corporate Plan, BNI is currently at the right strategic stage to keep the recent trends mitigated through the Platform phase, with a laid focus on structuring business processes and developing supporting infrastructure. In this phase, BNI is continuing the Business Process Reengineering initiative initiated in the previous phase, with an emphasis on simplifying and standardizing business processes, strengthening system integration, and optimizing the use of digital technology.



In this phase, BNI continued the Business Process Reengineering initiative it commenced in the previous phase, with an emphasis on simplifying and standardizing business processes, improving integration between processes, and strengthening system integration. Process standardization and automation were implemented comprehensively, particularly in the credit process, through end-to-end workflow improvements to enhance consistency, speed, and service quality. In parallel, BNI was also strengthening the use of digital technology and analytical capabilities to support decision-making, optimize business potential, and increase productivity.

The key outcomes expected from the Platform phase include transformation in the SME and Commercial segments, strengthening identity through branding updates and implementing more integrated communication programs and campaigns, and integrating all BNI service platforms. This integration was intended to deliver a more seamless customer experience and strengthen synergies between products and segments.

In Wholesale Transaction Banking, BNI worked to enhance its value proposition by developing an integrated platform that includes cash management, trade finance, foreign exchange, and custody services. This platform enhancement was aimed at providing more comprehensive transaction solutions tailored to the needs of corporate customers, while also supporting increased efficiency and service quality.

Meanwhile, in terms of portfolio strategy, BNI aspires to drive sustainable growth by laying its focus on how to deliver a healthy growth in the Corporate segment, both private and state-owned enterprises, as well as the Consumer segment as the second growth pillar after Corporate. Improvements in the small and medium-sized segments continue to be pursued to increase productivity and asset quality, with growth oriented towards the wholesale business value chain.

BNI also recognizes that the Bank's progress and success have a lot to do with the environmental and social impacts arising from its activities. That's why BNI is delivering on its commitment to supporting Net Zero Emissions (NZE) and climate resilience through environmental management, both within its internal operations and external ecosystem. The Company has an ESG roadmap whose target is to reduce GHG emissions and support NZE, with the NZE target in 2028 for operations while 2060 for financing.

BNI'S STRATEGIC POLICY FOR 2025

Amidst macroeconomic dynamics throughout 2025 that impacted the banking business landscape, the Company was proactive in monitoring how situations developed and taking mitigating measures to minimize the impacts on its strategic policy execution. This approach ensured that the 2025 business targets were achieved while maintaining sustainable growth in accordance with

the Company's long-term plan. Based on BNI's Long-Term Plan, outlined in the BNI Corporate Plan 2024-2028 document, BNI is implementing its 2025 strategic policy to achieve the previously established targets, as outlined below:

1. Increasing business productivity and market share in
2. Increasing Retail Savings and Deposits, as well as Transaction-Based Current Accounts.
3. Healthy and sustainable growth across all segments, with a primary focus on the corporate and derivative segments, as well as quality consumer and wealth.
4. Maintaining asset quality to drive a reduction in Loan at Risk (LaR).
5. Continuous development of wondr by BNI, BNIdirect, FSCM, and platforms that support the customer journey.
6. Strengthening enablers that result in increased productivity and operational efficiency

BNI TRANSFORMATION

Based on the 2024-2028 Corporate Plan, the Transformation continues to be implemented sustainably, focusing on BNI's Long-Term Strategy. In 2025, BNI's strategic policy focuses on ensuring the achievement of predetermined targets, while sharpening strategy execution in regions aligned with superior economic potential and strengthening collaboration in developing and cultivating an integrated business ecosystem. The following are the Transformations implemented by BNI throughout 2025:

1. **New Region, Area & Branch Model (BRAVE)** - Sharpening the organization, business processes, network development, and sales model to execute the strategy to capture market share.
2. **Branch Transformation Project - Intelligent Branch** - Integrating digital/e-channel services with branch services to provide the best customer experience.
3. **Loan Management System Wholesale (lendix)** - An end-to-end credit process system for the wholesale segment integrated with core banking and surrounding areas.
4. **Wholesale Transaction Banking Transformation (New BNIdirect)** - A one-stop digital financial service solution for wholesale customers.
5. **SME Banking Revamp-** End-to-end credit process improvements in the SME business segment to increase SME productivity.
6. **Sanur Special Economic Zone (SEZ) -** Optimizing BNI's support in the construction and development of the Sanur SEZ, identifying business potential and orchestrating its execution.
7. **RM Tool (connect) & Customer Profitable Report (CPR) -** The RM tool serves as a pipeline management and database. The CPR tool calculates the profit/loss of customers/debtors, both group and non-group, on a BNI-wide basis.
8. HC Roadmap - An integral part of BNI's human resource development strategy that supports BNI's business strategy.

These initiatives are in line with BNI's strategy to support the achievement of BNI's performance in 2025.

Transformation Acceleration: Strengthening BNI Towards Strategic Policy Directions.

1. **Increasing business productivity and market share across regions through outlet transformation with the New Region, Area & Branch Model & Branch Transformation Project – Intelligent Branch implementation.**

   BNI implements the New Region, Area & Branch Model, known as BRAVE (Branch, Region, Area, Value and Empowerment), by improving its organizational structure, business workflows, network development, and sales strategy. This initiative aims to strengthen BNI's ability to capture market share and business productivity. By transforming its outlets, BNI has sought to improve operational efficiency and expand market dominance in various regions. BNI has taken it a step further by implementing the Branch Transformation Project. One manifestation of this transformation is the Intelligent Branch concept, which integrates digital services with conventional services at branch offices to provide an optimal customer experience.

2. **Increasing Retail Savings and Deposits, and Transaction-Based Current Accounts through the Sanur Special Economic Zone (SEZ) Development Strategy.**

   To encourage sustainable and comprehensive growth, BNI is not only strengthening its funding base by increasing its Savings, Retail Deposits, andTransaction-Driven Current Accounts through Business as Usual (BaU) business development. Furthermore, BNI is also active in contributing to national strategic development projects, such as optimizing support for the development of the Special Economic Zone (SEZ) in Sanur, Bali. BNI's commitment to the Sanur SEZ is providing integrated digital financial solutions to build a sustainable economic ecosystem and create added value for stakeholders.

3. **Healthy and sustainable growth across all segments by maintaining asset quality to drive a reduction in Loan at Risk (LaR) in the corporate and derivative segments, as well as in the quality consumer and wealth segments as a main focus.**

   BNI is committed to achieving healthy and sustainable growth across all segments, with a top priority on maintaining asset quality to reduce Loan at Risk (LaR), particularly in the corporate and derivative segments, as well as consumer and wealth management. This strategy was implemented through the digitization of supporting processes, such as the implementation of the Loan Management System Wholesale (Iendix), which digitizes and integrates end-to-end credit processes with core banking, and the SME Banking Revamp to optimize RM productivity. Furthermore, data management is optimized through the use of the RM Tool (Connect) as a pipeline management system and the Customer Profitable Report (CPR) to comprehensively analyze debtor profitability across the BNI network.

   Furthermore, in line with the corporate plan and to provide transaction solutions across the customer's business value chain, the Value Chain Task Force (TFVC) plays a crucial role in orchestrating customer business needs with banking solutions across each segment. TFVC focuses on developing value chain potential at L0 (30 corporate companies and 13 institutional institutions) and L1 (suppliers and buyers from L0) by synergizing with various units (Divisions, Regions, and Subsidiaries). Since April 2025, TFFC has taken the initiative to explore pain points (through focus group discussions with the CMC Division, RCC, and Branch Offices), identify value chain potential, support the development of Supply Chain Financing (SCF) solutions for the customer ecosystem, distribute lead data, develop enablers that facilitate RMs in offering solutions (SCF libraries, SCF desks, offering letters, etc.), prepare monitoring dashboards, periodically monitor performance achievements, and implement corrective actions for continuous improvement.

4. **Continuous development of platforms that support the customer journey.**

   BNI is progressively accelerating the transformation of its digital ecosystem through the development of flagship platforms such as wondr by BNI and BNIdirect to create a comprehensive, seamless customer journey. As a key pillar in the transformation of Wholesale Transaction Banking, the launch of BNIdirect's new face positions itself as a one-stop solution that integrates all the complexities of corporate financial services into one intuitive platform. This initiative represents BNI's concrete step in building innovative and adaptive digital banking capabilities, which not only improve customer operational efficiency but also reinforce new standards in digital financial inclusion across all business segments.

5. **Strengthening enablers that result in increased productivity and operational efficiency**

   BNI integrated human resource development into the HC Roadmap framework as a key instrument for improving organizational efficiency and output. By focusing on aligning talent capabilities with business policy directions, BNI sought to build a solid and adaptive operational foundation. The collaboration between competent human resources and efficient support systems ensures the company continues to deliver top-notch performance to support sustainable business growth.

INNOVATION AS A STRATEGIC ENABLER OF BNI'S TRANSFORMATION

In the era of digital disruption and intensifying competition in the banking industry, innovation is no longer merely a strategic choice, but a business imperative that determines the company's sustainability and competitiveness. BNI positions innovation as a fundamental enabler in its Strategic Plan, focusing on creating measurable added value through increased operational efficiency, accelerated business growth, and enhanced customer experience.

BNI's commitment to innovation is reflected in its ongoing investment in building an inclusive innovation ecosystem, involving not only Hi-Movers as internal innovators but also various external stakeholders through collaborations with universities and the startup ecosystem. This collaboration between innovation stakeholders is realized through the holding of various innovation events, encompassing both internal and external innovation, as a forum for collaboration, idea exchange, and the development of innovative solutions aligned with the company's strategic direction.

Innovation Timeline and Key Milestones 2025

Q1
- Implementasi ide inovasi BINNOVA 2024 yaitu Fitur Investasi di wondr by BNI
- Grand Final BINNOVA Batch 4 2024
- Idea Submission BINNOVA Batch 5 2025

Q2
- Pelaksanaan Inkubasi BINNOVA Batch 5 2025
- Launching Innovation Corner di Blok M, Jakarta Selatan

Q3
- Implementasi ide inovasi BINNOVA 2024 yaitu Fitur Dana Pensiun di wondr by BNI
- Pelaksanaan Grand Final BINNOVA Batch 5 2025.
- Kolaborasi dengan BNI Ventures dan ekosistem start up dalam penyelenggaraan SparkArc Ideathon 2025
- Kolaborasi dengan ekosistem universitas dalam program Gadjah Mada Business Case Competition
- Kolaborasi dengan ekosistem universitas dalam penyelenggaraan Univesitas Indonesia (UI) Innovation War
- Kolaborasi dengan ekosistem universitas dalam penyelenggaraan International Student Development Competition, Universitas Airlangga
- Idea Submission BINNOVA Batch 6 & 7 2025

Q4
- Kolaborasi BNI & BNI Ventures dalam penyelenggaraan BNV Arcade 2025 Penyelenggaraan BNI Innovation Forum 2025
- Pelaksanaan Inkubasi BINNOVA Batch 6 & 7 2025

Bni Innovation (Binnova): Hi-Movers' Place to Innovate

BINNOVA is a regular innovation event held internally within BNI. The goal of BINNOVA is to seek the best ideas from Hi-Movers, which can be implemented to have a positive impact, both in increasing revenue and cost efficiency, as well as improving the effectiveness of business processes.

1. BINNOVA 2024: Foundation for Transformation
   The BINNOVA 2024 program has generated a solid innovation pipeline, with several innovation ideas implemented in 2025. The implementation of BINNOVA 2024 results has made a tangible contribution to achieving BNI's strategic targets, particularly in digital banking enhancement. Several innovation ideas from the BINNOVA 2024 program have been implemented in 2025, namely:
   a. Digital Investment Features on wondr by BNI
      The digital investment features on wondr by BNI include access to various instruments such as Mutual Funds and Government Securities (SBN), offering the convenience of automated investment with reminders and scheduled deposits, and providing financial insights and an integrated transaction experience. This application aims to make it easier for BNI customers to invest consistently to achieve their financial goals.

   b. Pension Fund Features on wondr by BNI
      The Pension Fund feature on the wondr by BNI application was developed as part of the digital transformation of Financial Institution Pension Fund (DPLK) services. This innovation enables customers to manage and plan their retirement funds more easily, informatively, and securely. With a fresh and interactive interface, the Pension Fund feature makes it easy for customers to monitor products, services, and pension fund developments transparently and accurately. Since its launch in October 2025, this feature has contributed to the growth in the number of accounts (NOA) by 81.27% as of December 2025 compared to the year-to-date (YTD) NOA as of September 2025.

2. BINNOVA 2025: Sustainable Growth Momentum
   a. BINNOVA Batch 5: Operations Excellence
      The theme for BINNOVA Batch 5 is "Realizing Operations Excellence through Fast, Lean, and Accurate Processes." This idea was chosen because it aligns with one of BNI's 2025 strategies, namely "Strengthening enablers that result in increased productivity and operational efficiency." Furthermore, this theme was chosen because there is still room for improvement in Banking Operations, Digital Operations, and Credit Operations to maximize existing end-to-end operational business processes.

      The BINNOVA Batch 5 idea submission process was conducted from February 20, 2025, to April 27, 2025. During the idea submission period, 98 innovation ideas were submitted through BNI's Ideabox. After a curation process by innovation management, 14 innovation ideas were selected to advance to the customer validation (CV) and product validation (PV) incubation processes. These processes aim to validate the innovation idea and develop a high-fidelity prototype and Minimum Viable Product (MVP) to generate added value for customers, which are then presented to business owners for implementation. Following the curation and incubation stages, six innovation teams were selected to advance to the Grand Final Pitching stage, which will be held on September 18, 2025.

   b. BINNOVA Batches 6 & 7: Attract More, Engage Daily, Retain Strongly
      BINNOVA Batches 6 & 7 carried the theme "Attract more, Engage daily, Retain strongly" to support the sustainable increase in low-cost funds (CASA) acquisition and retention. The idea submission period ran from August 5, 2025, to September 30, 2025. BINNOVA Batch 6 was specifically for Hi-Movers from Regional/Branch/Central Offices, focusing on improving relationship-based business execution, services, and product activities for BNI's business retention and growth. Meanwhile, BINNOVA Batch 7 focused on strengthening strategies and initiatives to develop BNI's customer acquisition and retention. BINNOVA Batch 7 was specifically for Hi-Movers from the Head Office.

      A total of 62 innovation ideas were submitted to BINNOVA Batch 6, compared to 112 innovation ideas submitted to BINNOVA Batch 7 last year. Based on curation conducted by innovation management, seven innovation ideas were selected for BINNOVA Batch 6. and 11 innovation ideas from BINNOVA Batch 7 were declared successful in the incubation process, which includes customer and product validation. The grand final pitching stage for BINNOVA Batches 6 and 7 will be held in 2026.

External Innovation: Strengthening Collaboration Among Stakeholders

In addition to accelerating internal innovation, BNI is strategically building an external innovation ecosystem through sustainable multi-stakeholder collaboration. Through this approach, BNI opens up broader collaboration opportunities from the perspectives of academia, industry, and society. This initiative is realized through various strategic programs, including the Campus Innovation Challenge, Open Innovation, and the Innovation Forum, which are designed as open ecosystems to gather innovative ideas from various parties.

The Campus Innovation Challenge is a collaborative program between the BNI Group and several leading universities in Indonesia. This program provides a space for students to play an active role in providing creative ideas and solutions to real-world problems faced by the BNI Group. Furthermore, winners of the Campus Innovation Challenge will have the opportunity to participate in the BNI Group employee selection process. This program is expected to serve as concrete evidence of BNI Group's commitment to fostering the actualization of young people in developing innovative, analytical, and applicable thinking that aligns with industry needs, while also creating job opportunities for them. In addition to encouraging innovative ideas, this program also has a positive impact on strengthening BNI's retail business, particularly Wonder by BNI and the use of QRIS as a payment method during activities. This program is also expected to strengthen the strategic relationship between the BNI Group and universities.

Meanwhile, Open Innovation is implemented as an inclusive collaboration platform involving various external stakeholders, including students, startups, and communities. Through a synergy with BNI Ventures, BNI will organize various open innovation programs throughout 2025, one of which is BNV Arcade, a collaborative platform between the BNI Group and startups and industry players. This program is designed to identify and accelerate innovative solutions to BNI Group pain points, with results that have high potential for implementation across the BNI Group to support performance improvement and business transformation.

In addition, BNI, in collaboration with BNI Ventures, has also held the BNI Innovation Forum 2025, where this forum serves as a forum for sharing knowledge and experience between state-owned enterprises, private companies, start-ups, and the public in identifying innovation trends, studying success stories and failures, and discussing the direction of innovation development to strengthen synergies and broaden perspectives between industries in facing future business challenges. This forum is expected to strengthen BNI's position as a bank with a strong commitment to innovation.

Transparency in Report Submission

TRANSPARENCY IN REPORT SUBMISSION

BNI is committed to fulfilling the principle of information disclosure, which is very important for the public in making investment decisions. For this reason, BNI routinely submits Disclosure of Information or Material Facts reports to the Financial Services Authority (OJK) and also announces this information to the public.

In 2025, the Corporate Secretary conveyed various information related to BNI to the public through mass media, the IDX website, and the BNI website using Indonesian and English. The Corporate Secretary has also submitted regular and incidental reports to IDX and OJK with the following details:

PERIODIC REPORTS

The following table presents detailed information regarding the Transparency of Report Submission carried out by BNI in 2025:

Report	Number of Report	Intended for	Period
BBNI Securities Holder Registration Monthly Report	12	OJK & IDX	Monthly
Consolidated Financial Statements of the Bank and Subsidiaries (UnAudited)	3	OJK & IDX	Quarterly
Annual Financial Report (Audited)	1	OJK & IDX	Annually
Annual Report (including Corporate Governance Report, Corporate Governance Report of Sharia Business Unit, and Integrated Governance Report of BNI Financial Conglomeration)	1	OJK & IDX	Annually
Sustainability Report	1	OJK & IDX	Annually
Annual Rating Report	1	OJK & IDX	Annually
Annual Report of Parent and Subsidiary Banks (Report	1	OJK	Annually
of Banks that are part of a business group)	2	OJK	Semi-annual
Related Party List Report	1	IDX	Annually
Annual Public Expose Report	4	OJK & IDX	Quarterly
List of 10 Largest Shareholders Report	4	OJK & IDX	Quarterly
Company Performance Report (Earning Call)	1	OJK & IDX	Annually
Annual General Meeting of Shareholders Invitation Report	1	OJK & IDX	Annually
Report on the Implementation of the Annual General Meeting of Shareholders	1	OJK & IDX	Annually
Cash Dividend Payment Implementation Report	1	OJK & IDX	Annually

INCIDENTAL REPORT

Throughout 2025, BNI has made 51 information disclosures in the form of incidental reports to regulators (OJK and/or IDX).

Detailed information regarding the periodic reports and incidental reports above can be viewed and accessed via the BNI website at https://www.bni.co.id/id-id/investor/berita-investor/keterbukaan informasi

Management of State Officials' Wealth Reports (LHKPN)

As a manifestation of BNI's commitment to increasing transparency and building a work culture free from Corruption, Collusion, and Nepotism (KKN), all members of the Board of Commissioners, Directors, and Structural Officials are required to submit a Wealth Report (LHK). This reporting is carried out in accordance with internal provisions stipulated in the Company's Industrial Relations Guidelines, Instruction No. IN/002/HCE/001 dated January 22, 2025.This obligation is an integral part of the implementation of Good Corporate Governance (GCG) principles at BNI, while ensuring compliance with applicable regulations and strengthening the integrity and accountability of all levels of management.

LHKPN POLICY

The development of BNI's internal policy regarding the LHKPN submission and reporting mechanism required for Bank officials with certain positions embodies the following laws and regulations:

1. Law No. Law No. 28 of 1999 concerning State Administrators Who Are Clean and Free from Corruption, Collusion, and Nepotism, as amended by Law No. 30 of 2002 concerning the Corruption Eradication Commission;
2. Regulation of the Corruption Eradication Commission of the Republic of Indonesia Number 7 of 2016 concerning Procedures for Registration, Announcement, and Examination of the Assets of State Officials, as last amended by Regulation of the Corruption Eradication Commission of the Republic of Indonesia Number 3 of 2024 concerning the Second Amendment to Regulation of the Corruption Eradication Commission Number 07 of 2016 concerning Procedures for Registration, Announcement, and Examination of the Assets of State Officials.
3. Regulation of the Minister of State-Owned Enterprises No. PER-01/MBU/01/2018 on the Reporting of Assets of State Officials within the Ministry of State-Owned Enterprises, as amended by Regulation of the Minister of State-Owned Enterprises No. PER-10/MBU/06/2021 concerning the Amendment to Regulation of the Minister of State-Owned Enterprises No. PER-01/MBU/01/2018 on the Reporting of Assets of State Officials within the Ministry of State-Owned Enterprises.
4. Law No. 19 of 2003 on State-Owned Enterprises, as amended several times, most recently by Law No. 16 of 2025 on the Fourth Amendment to Law No. 19 of 2003 on State-Owned Enterprises.

BNI has written policies and procedures regarding the LHKPN submission procedure, the appointment of work units in charge for managing and administering the LHKPN, and the establishment of a sanction-giving mechanism for Bank officials who neglect or fail to fulfill their reporting obligations. This is done to ensure compliance with regulations and maintain the integrity of all BNI personnel in accordance with GCG principles.

LHKPN REQUIRED REPORT

In accordance with applicable regulations, BNI Structural Officials who are required to report LHKPN are:

1. Commissioners;
2. Directors;
3. Senior Executive Vice Presidents (SEVPs);
4. Division/Unit/Functional Unit Heads
   If there is no Head in a Functional Unit, then the State Officials who are required to submit LHKPN in that Functional Unit are those with a minimum position level of Senior Vice President;
5. Regional Leaders;
6. General Managers (GMs) of Overseas Branches; and
7. Commissioners/Directors of Subsidiaries/ Consolidated Affiliated Companies.

LHKPN MANAGEMENT

The LHKPN reporting of BNI Structural Officials is managed by the LHKPN Management Coordinator, Application Administrator, and LHKPN Work Unit Administrator, with the following description:

1. The LHKPN Management Coordinator is the Division Head overseeing the Human Capital Services function with the following scope of duties:
   a. Monitoring the completion and submission of LHKPN and disseminating LHKPN obligations.
   b. Coordinating with the Ministry of State-Owned Enterprises and the Corruption Eradication Commission (KPK) regarding LHKPN management at BNI.
   c. Compiling a list of State Officials within BNI who are required to submit LHKPN.
   d. Reminding State Officials within BNI who are required to submit LHKPN to comply with the LHKPN submission and announcement obligations.
2. The LHKPN Application Administrator is an official at the Department Head level in the Division overseeing the Human Capital Services function, who handles industrial relations functions with the following scope of duties:
   a. Updating data on State Officials within BNI who are required to submit LHKPN (State Officials' Reports) on the e-LHKPN application.
   b. Submitting data regarding changes in State Officials' positions to the Corruption Eradication Commission (KPK).
   c. Acting as a contact person or liaison between the KPK and BNI in LHKPN management.
3. The LHKPN Work Unit Admin is an official at the Department Head level who oversees the management function of State Officials and monitors and coordinates with the LHKPN Application Admin. There are three Work Unit Admins at BNI:
   a. Corporate Secretary Division;
   b. Subsidiaries Management Division;
   c. International & Financial Institutions Division.

2025 LHKPN REPORTING

In 2025, all BNI officials who fell under those required to submit LHKPN Report already submitted the State Officials' Wealth Report (LHKPN) to the Corruption Eradication Commission (KPK) via the e-LHKPN website.

Bad Corporate Governance Practices

Bad corporate governance practices refer to a series of actions or policies that diverge from the principles of sound corporate governance. Throughout 2025, BNI is recorded as having neither taken actions nor established policies related to bad corporate governance practices, as detailed in the following table:

Description	Practised in 2025
Reports indicating the company as an environmental polluter	None
Legal cases currently faced by the Bank, subsidiaries, members of the Board of Directors, and/or members of the Board of Commissioners who are currently in office, not disclosed in the Annual Report	None
Non-compliance in fulfilling tax obligations	None
Inconsistencies in the presentation of the Annual Report and Financial Statements with applicable regulations and Financial Accounting Standards	None
Legal cases or disputes involving labor and employees	None
Lack of disclosure of operating segments in the listed company	None
Discrepancies between the hardcopy and softcopy versions of the Annual Report	None

Implementation of Integrated Governance

Integrated Governance for the Financial Conglomeration at BNI is implemented in accordance with OJK Regulation No. 18/POJK.03/2014 on the Implementation of Integrated Governance for Financial Conglomerations, OJK Regulation No. 30 of 2024 on Financial Conglomerations and Financial Conglomeration Parent Entities, and OJK Circular Letter No. 15/SEOJK.03/2015 on the Implementation of Integrated Governance for Financial Conglomerations.

As the Main Entity (PIKK) within the Financial Conglomerate, BNI implements Integrated Governance to ensure transparency and compliance with regulations. In 2025, the implementation of Integrated Governance encompassed the following aspects:

a. Self-Assessment Reports on the Implementation of Integrated Governance.
b. Structure of BNI Financial Conglomerate.
c. Shareholding Structure within the BNI Financial Conglomerate.
d. Management Structure of the BNI Financial Conglomerate.
e. Core Principles of Integrated Governance for BNI Financial Conglomerate
f. Intra-Group Transaction Policy within BNI Financial Conglomerate.

SELF-ASSESSMENT REPORT ON THE IMPLEMENTATION OF INTEGRATED GOVERNANCE IN 2025

In accordance with applicable regulations, Financial Conglomerates are required to periodically prepare Self-Assessment Reports on Integrated Governance, specifically in June and December. These reports must be submitted to OJK no later than the 15th of the second month following the end of the reporting period, i.e., August 15 and February 15, respectively.

The Self-Assessment of the implementation of Integrated Governance principles in BNI's Financial Conglomerate focuses on three main aspects, namely: Structure, Process, and Outcome. The evaluation centers on seven key assessment factors, which serve as benchmarks for the implementation of Integrated Governance:

1. Execution of the Duties and Responsibilities of the Board of Directors of the Main Entity. (in its capacity as the Financial Conglomeration Parent Entity/PIKK).
2. Execution of the Duties and Responsibilities of the Board of Commissioners of the Main Entity. (PIKK).
3. Duties and Responsibilities of the Integrated Governance Committee.
4. Duties and Responsibilities of the Integrated Compliance Unit.
5. Duties and Responsibilities of the Integrated Internal Audit Unit.
6. Implementation of Integrated Risk Management.
7. Development and Implementation of Integrated Governance Guidelines.

BNI has compiled a self-assessment report on the implementation of Integrated Governance in the BNI Financial Conglomerate for the 2025 period, which is described in detail below:

Integrated Governance Self-Assessment Results

Rating		Rating Definition
Semester I 2025	Semester II 2025	
2	2	The Financial Conglomerate is deemed to have implemented Integrated Governance effectively overall. This assessment is evident from the satisfactory application of Integrated Governance principles. Any shortcomings in the implementation of Integrated Governance can be resolved through routine corrective actions carried out by the Main Entity (PIKK) and/or Financial Services Institutions.

Results of Self-Assessment on the seven assessment factors for Integrated Governance Implementation in 2025 is as follow:

1. Board of Directors of the Main Entity (PIKK)
   Under the Integrated Governance structure, all members of BNI's Board of Directors have met the qualifications stipulated by applicable laws and regulations. The implementation of duties and responsibilities of the BNI Board of Directors related to the Integrated Governance process has been carried out and followed up in accordance with the advice and counsel of the BNI Board of Commissioners.

2. Board of Commissioners of the Main Entity (PIKK)
   Within the Integrated Governance structure, all members of BNI's Board of Commissioners meet the qualifications required by prevailing regulations. The Board of Commissioners has fulfilled their oversight duties by holding regular meetings and supervising the implementation of the Board of Directors' responsibilities as the Main Entity. They have also provided recommendations for enhancing the Integrated Governance Guidelines.

3. Integrated Governance Committee
   The Integrated Governance Committee has been established in compliance with applicable regulations. In order to improve the TKT Guidelines, the TKT Committee has provided recommendations to the BNI Board of Commissioners for the improvement of the TKT Guidelines. The evaluation results and outcomes of the TKT Committee Meeting were submitted to the Board of Commissioners through the TKT Committee Task Implementation Report periodically.

4. Integrated Compliance Working Unit
   The Integrated Compliance Working Unit (SKKT) is independent and separate from the Operational Working Unit (risk taking unit), and is directly responsible to the Director in charge of the compliance function. SKKT has submitted the results of monitoring, evaluation and suggestions for improvement in the implementation of the compliance function in each Financial Services Institution of the BNI Financial Group periodically.

5. Integrated Internal Audit Unit
   The Integrated Internal Audit Unit (SKAIT) operates independently from BNI's operational units and reports directly to the President Director of the Main Entity (in its capacity as PIKK) and, on a dotted line basis, to the Board of Commissioners of the Main Entity (PIKK). The Integrated Internal Audit Unit has monitored the implementation of internal audits across the BNI Financial Conglomeration through the conduct of integrated audits at each member of the BNI Financial Conglomeration.

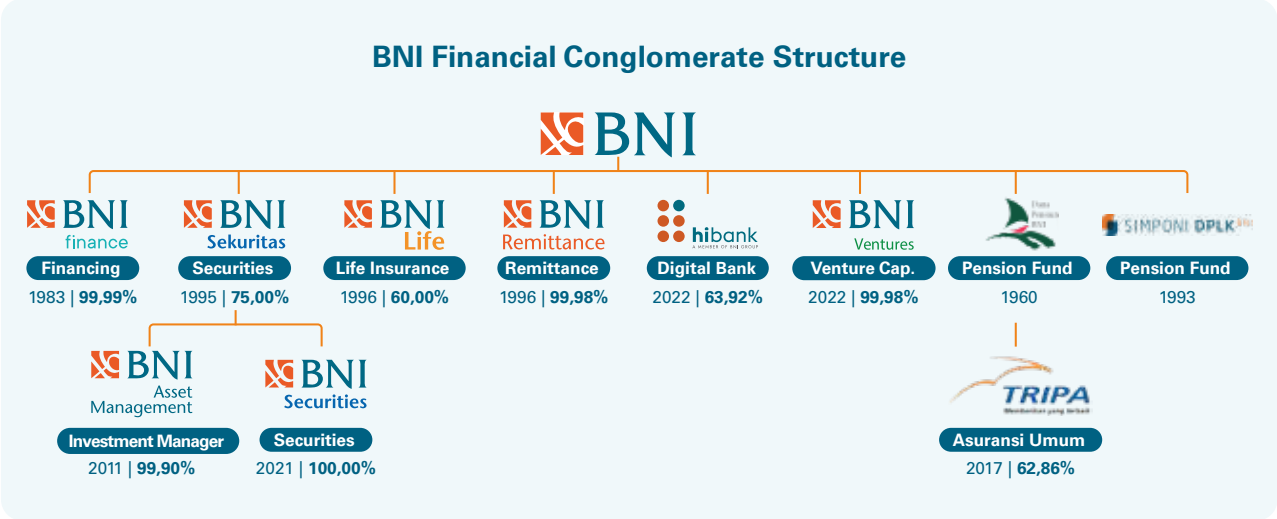
6. Implementation of Integrated Risk Management
   The Risk Management Director of BNI, who directs the Integrated Risk Management function, supervises the Integrated Risk Management Unit (SKMRT). Each member of the Financial Conglomeration has a Director responsible for the risk management function and a dedicated Risk Management Unit. The implementation of Integrated Risk Management across the BNI Financial Conglomeration has been carried out in accordance with the characteristics and complexity of each business.

7. Integrated Governance Guidelines
   The Integrated Governance Guidelines of the BNI Financial Conglomeration have been developed, reviewed, and implemented in compliance with applicable laws and regulations. These guidelines, among others, set out the requirements as well as the duties and responsibilities of the Board of Directors and the Board of Commissioners of the Main Entity (PIKK), the Integrated Governance Committee, the Integrated Compliance Unit, the Integrated Internal Audit Unit, the implementation of integrated risk management, and the coordination mechanisms among integrated units.

FINANCIAL CONGLOMERATE STRUCTURE AND OWNERSHIP STRUCTURE OF THE BNI FINANCIAL CONGLOMERATE

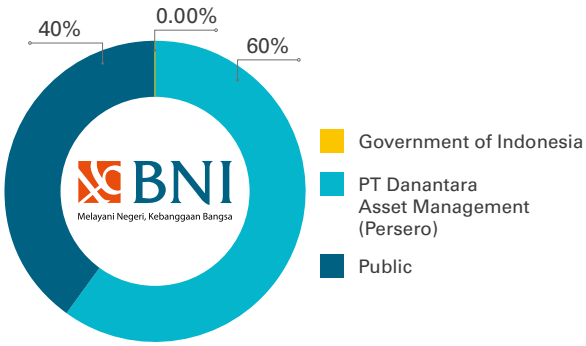
BNI Financial Conglomerate Structure

As of December 31, 2025, struktur Konglomerasi Keuangan dan struktur kepemilikan Konglomerasi Keuangan BNI adalah sebagai berikut:



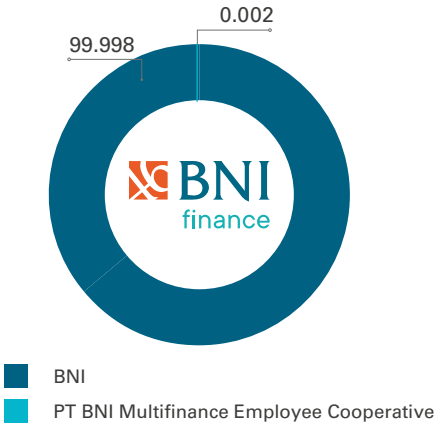
Share ownership structure in the BNI Financial Conglomerate

As of December 31, 2025, the share ownership structure of the BNI Financial Conglomerate is as follows:



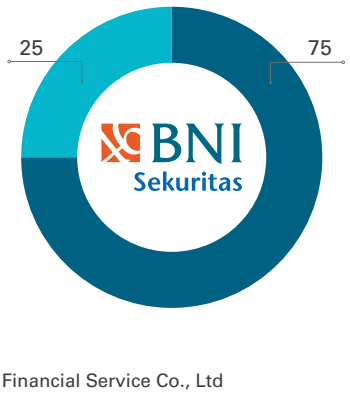
BNI Finance Share Ownership Structure

(%)

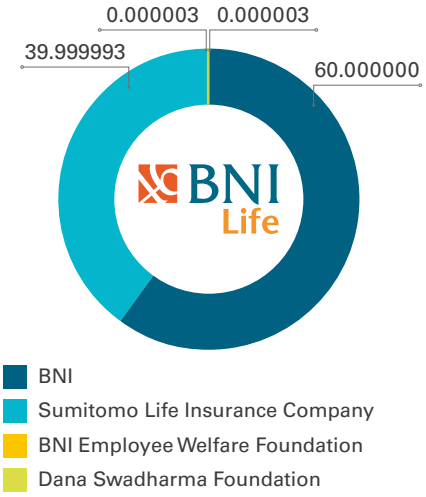


BNI Sekuritas Share Ownership Structure

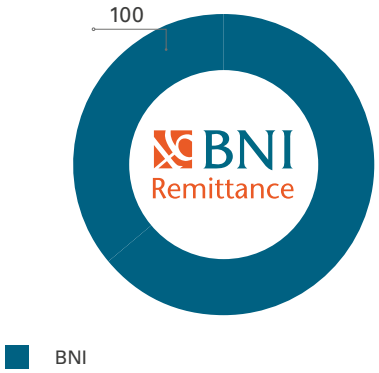
(%)



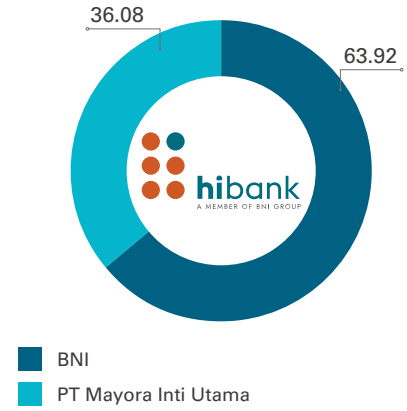
BNI Life Share Ownership Structure
(%)



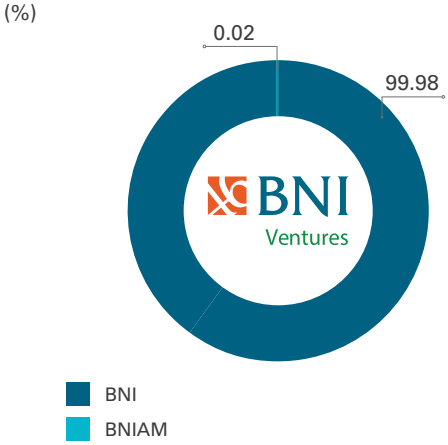
BNI Remittance Share Ownership Structure
(%)



Hibank Share Ownership Structure
(%)



BNI Ventures Share Ownership Structure
(%)

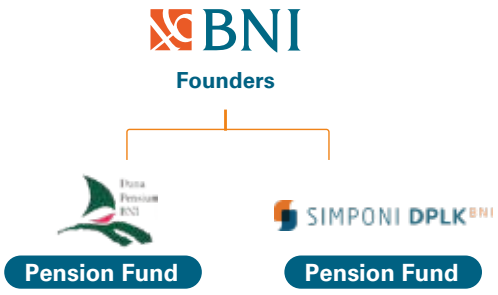


BNI Asset Management Share Ownership Structure
(%)



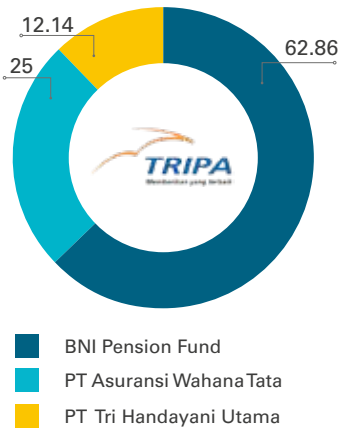
BNI Securities Share Ownership Structure
(%)





Share Ownership Structure of PT Asuransi Tri Pakarta

(%)



MANAGEMENT STRUCTURE OF BNI FINANCIAL CONGLOMERATE

Management Structure of the Main Entity (dhi. PIKK)

The management structure of the Main Entity's Board of Directors (PIKK) can be found in the BNI Board of Directors Profile section on page 742 and the BNI Board of Commissioners Profile section on page 699.

Management Structure of Financial Conglomerate Members

PT BNI Multifinance

Board of Commissioners	Board of Directors
President Commissioner/Independent Commissioner: Suhartono[1)]	President Director: Yenanto Siem[1)]
Commissioner: Hari Satriyono	Director: Albertus Henditrianto
Commissioner: Ita Tetralastwati	Director: Legendariah

[1)] Effective after the reappointment process is complete.

PT BNI Sekuritas

Board of Commissioners	Board of Directors
President Commissioner/Independent Commissioner: Rudy Tandjung Commissioner: Kenji Nakanishi	Acting President Director: Vera Ongyono Director: Yoga Mulya
	Director: Teddy Wishadi

PT BNI Life Insurance

Board of Commissioners	Direksi	Dewan Pengawas Syariah
Independent Commissioner: Alwi Abdurrahman Shihab	Finance Director (Acting President Director): Agung Turanto Sutarno	Chairman: Agus Haryadi
Independent Commissioner: Eko Yuliantoro	Director: Motoharu Niijima	Member: Utang Ranuwijaya
Commissioner: Beby Lolita Indriani	Director: Masaaki Fuse	Member: Siti Haniatunnisa
Commissioner: Takafumi Igarashi		

PT Bank Hibank Indonesia

Board of Commissioners	Board of Directors
Independent Commissioner: Rufina Tinawati Marianto	President Director: Jenny Wiriyanto
Independent Commissioner: Joys Djajanto	Director: Ricky Budiono
	Director: Adi Syaf Putra
	Director: Prihadiyanto
	Director: Andi M. Andries

PT BNI Modal Ventura

Board of Commissioners	Board of Directors
President Commissioner: Victor Erico Korompis	President Director: Mardianto E Danusaputro[1)]
Independent Commissioner: Kartika Hendrawan	Director: Lugas Prancafitri

[1)] Effective after the reappointment process is complete.

BNI Remittance Ltd

Board of Directors	
Director: Indra Kusuma	

PT BNI Asset Management

Board of Commissioners	Board of Directors
President Commissioner/Independent Commissioner: Eko Priyo Pratomo	President Director: Mungki Ariwibowo Adil
Commissioner: Henny Eugenia	Director: Putut Endro Andanawarih
	Director: Ade Yusriansyah

BNI Securities Pte, Ltd

Board of Directors
Executive Director: Edwin Chew
Non Executive Director: Rudy Sihombing

BNI Financial Institution Pension Fund (DPLK BNI)

Board of Supervisors	Sharia Supervisory Board	Management
Chairman: Rini Yuniar	Chairman: Dawud Arif Khan	Chairman: Ikhwani Fauzana
Member: Rayendra Minarsa Goenawan	Member: Muhammad Fahri Farid	Member: Endhy Maryantono
Independent Supervisor: Suhardi Petrus		Member: YB Eko Wardoyo
		Member: Edwin Hendrawan
		Member: Estu Prabowo
		Member: I Wayan Sridana

Dana Pensiun BNI (DP BNI)

Board of Supervisors	Board of Directors
Chairman: Dandy Perwandi Sjamsudin	President Director: Asmorohadi
Deputy Chairman: Yaman Bafiroes	Investment Director: Bedie Roesnadi
Member: Alfri Hamonangan	Director of General Affairs, Membership & Finance: Arief Surarso
Member: Rini Yuniar	

PT Asuransi Tri Pakarta

Board of Commissioners	Board of Directors	Sharia Supervisory Board
President Commissioner/Independent Commissioner: Endang Hidayatullah	President Director: G.C. Koen Yulianto	Sharia Supervisor: Aminuddin Yakub
Independent Commissioner: Bambang Siswanto	Vice President Director: Rafael Bao Aman	Sharia Supervisor: Mursyidah Thahir
Commissioner: Tri Wahono	Finance & IT Director: Indomora Harahap	
	Technical Director: Teguh Pambudi	

Authorities, Duties, and Responsibilities in the Implementation of Integrated Governance within BNI Financial Conglomeration Financial Institutions

Here is how the authorities, duties, and responsibilities in the process and outcomes of the implementation of Integrated Governance within BNI Financial Conglomeration Financial Institutions is implemented:

a. Board of Directors of BNI

1. Ensure the implementation of Integrated Governance within the Financial Conglomeration.
2. Formulate the Integrated Governance Policy.
3. Direct, monitor, and evaluate the implementation of the Integrated Governance Policy.
4. Follow up on recommendations and advice from the Board of Commissioners in order to enhance the Integrated Governance Policy.
5. Ensure that audit findings and recommendations from the Integrated Internal Audit Unit, external auditors, supervisory results from the Financial Services Authority, and or other supervisory authorities have been properly followed up by members of the BNI Financial Conglomeration.
6. Convey the Integrated Governance Policy to the Boards of Directors of members of the BNI Financial Conglomeration.

b. Board of Commissioners of BNI

1. Conduct oversight of the implementation of Integrated Governance within the Financial Conglomeration.
2. Supervise the implementation of Integrated Governance in each member of the Financial Conglomeration to ensure alignment with the Integrated Governance Policy and consistency with the Integrated Risk Management Policy of the Financial Conglomeration Holding Company.
3. Oversee the exercise of authorities, duties, and responsibilities of the Board of Directors of the Financial Conglomeration Holding Company and provide recommendations and advice regarding the implementation of the Integrated Governance Policy.
4. Approve the Integrated Governance Policy prepared by the Board of Directors of the Financial Conglomeration Holding Company.
5. Evaluate the Integrated Governance Policy and provide direction for its enhancement based on recommendations from the Integrated Governance Committee.
6. Carry out supervisory duties in the interest of the Financial Conglomeration Holding Company over policies and management actions undertaken by the Board of Directors and provide advice to the Board of Directors, and be accountable for such supervision.

c. Boards of Directors of Members of the BNI Financial Conglomeration

1. Implement good governance practices in each member of the Financial Conglomeration in accordance with the Integrated Governance Policy and prevailing regulations.
2. Follow up on audit results and recommendations from internal audits, the Integrated Internal Audit Unit, external audits, supervisory results from the Financial Services Authority, and or other authorities and institutions in accordance with applicable laws and regulations.
3. Establish the Rules of Procedure of the Board of Directors of members of the Financial Conglomeration.
4. Conduct meetings of the Board of Directors of members of the Financial Conglomeration as further stipulated in the Articles of Association of each Financial Conglomeration member.
5. Ensure that all policies, provisions, systems, procedures, and business activities carried out by members of the Financial Conglomeration comply with applicable laws and regulations, including provisions issued by the Financial Services Authority and or other relevant authorities;

d. Boards of Commissioners of Members of the BNI Financial Conglomeration

1. Supervise the implementation of governance as well as the authorities, duties, and responsibilities of the Boards of Directors of Financial Conglomeration members, including follow up on audit or examination findings and recommendations from Internal Audit, External Audit, and or supervisory results from authorities and other institutions in accordance with prevailing laws and regulations.
2. Establish committees or appoint parties to perform functions supporting the authorities, duties, and responsibilities of the Boards of Commissioners of Financial Conglomeration members, at a minimum including an audit monitoring committee or function.
3. Conduct meetings of the Boards of Commissioners of Financial Conglomeration members as further stipulated in the Articles of Association of each Financial Conglomeration member.
4. Establish the Rules of Procedure of the Boards of Commissioners of Financial Conglomeration members.

e. Sharia Supervisory Board

1. The Sharia Supervisory Board is responsible for providing advice and recommendations to the Boards of Directors of Financial Conglomeration members and supervising business activities to ensure compliance with Sharia principles;
2. Establish the Rules of Procedure of the Sharia Supervisory Board.

f. Integrated Governance Committee

The duties, authorities, and responsibilities of the Integrated Governance Committee, as well as the implementation of the duties of the Integrated Governance Committee, can be found in the Committees under the Board of Commissioners chapter, Integrated Governance Committee subchapter, page 881.

g. Integrated Compliance Unit

The authority, duties, and responsibilities of BNI's Integrated Compliance Work Unit in the context of implementing integrated compliance within the BNI Financial Conglomerate can be found in the chapter on Supporting Bodies of the Board of Directors, subchapter on Compliance Functions, page 984.

h. Integrated Internal Audit Unit

The authority, duties, and responsibilities of BNI's Integrated Internal Audit Unit in the context of implementing integrated audits at BNI Financial Conglomerate can be found in Chapter Supporting Bodies of the Board of Directors, Sub-chapter Internal Audit Unit on page 962.

i. Integrated Risk Management Unit

The authority, duties, and responsibilities of BNI's Integrated Risk Management Work Unit in the context of implementing integrated risk management at BNI Financial Conglomerate can be found in the Integrated Risk Management Governance chapter on page 1024.

INTRA-GROUP TRANSACTION POLICY WITHIN THE BNI FINANCIAL CONGLOMERATE

Definition of Intra-Group Transaction Risk

The Financial Services Authority requires financial conglomerations in the financial services industry to implement integrated risk management, including the management of intra group transaction risks. Ownership and control relationships among entities within a conglomeration may affect the sustainability of financial institutions as a result of risk exposures, whether direct or indirect.

Intra group transaction risk arises from an entity's dependence on other entities within the same conglomeration, either through written or unwritten arrangements, which may involve the transfer of funds or other forms of obligations. A sound understanding of these risks enables financial conglomerations to manage and mitigate potential impacts arising from inter entity interactions more effectively.

Objectives of Intra-Group Transaction Risk Management

Management The objectives of Intra-Group Transaction Risk Management within the BNI Financial Conglomerate are as follows:

1. To regulate and monitor the risks of intra group transactions within the Financial Conglomerate based on prudential principles;
2. To ensure that the integrated risk management process minimizes the potential negative impacts caused by one LJK's direct or indirect dependency on another LJK within the Financial Conglomerate, and the negative impacts on the overall business condition of the BNI Financial Conglomerate.

Principles of Intra-Group Transaction Risk Management

BNI, as the main entity in the application of intra-group transaction risk management within the BNI Financial Conglomerate, must adhere to the following principles:

1. Having sufficient risk management processes for intra-group transactions within the entire Financial Conglomerate;
2. Monitoring intra-group transactions within the Financial Conglomerate and preparing regular reports;
3. Encouraging public disclosure of intra-group transactions;
4. Considering the impact of intra-group transactions on the performance of LJK members within the Financial Conglomerate, both directly and on the overall BNI Financial Conglomerate.

Types of Transactions That May Lead to Intra-Group Transaction Risks

Within the BNI Financial Conglomerate, various types of transactions may pose intra-group transaction risks. Some examples of such transactions include:

1. Cross-ownership between LJKs in the Financial Conglomerate;
2. Centralization of short-term liquidity management within the Financial Conglomerate;
3. Guarantees, loans, and commitments provided or obtained by one LJK from another LJK in the Financial Conglomerate;
4. Exposure to controlling shareholders, including loan exposure and off-balance sheet items such as guarantees and commitments;
5. Purchase or sale of assets between one LJK and another within the Financial Conglomerate;
6. Risk transfer through reinsurance; and
7. Transactions to shift third-party risk exposures among LJKs within the financial conglomerate.

Adequacy of Processes for Identifying, Measuring, Monitoring, and Controlling Risks, and the Risk Management Information System for Intra-Group Transactions

In managing intra-group transaction risks, BNI as the Main Entity (PIKK) implements processes for identifying, measuring, monitoring, and controlling risks associated with all material risk factors in an integrated manner. This process is supported by an adequate intra-group transaction risk management information system, which includes:

1. Intra-Group Transaction Risk Identification
   The identification of intra-group transaction risks is carried out by analyzing the types of products and/or transactions between LJKs within the BNI Financial Conglomerate that could give rise to risks within the conglomerate.
2. Intra-Group Transaction Risk Measurement
   The measurement of intra-group transaction risks aims to determine the risk rating of intra-group transactions within the Financial Conglomerate. BNI, as the main entity (PIKK), must establish a methodology for measuring intra-group transaction risks and assess the appropriateness of assumptions, data sources, and procedures used.
3. Intra-Group Transaction Risk Monitoring
   Monitoring of intra-group transaction risks involves evaluating exposure to material intra-group transaction risks that may affect the capital condition of the Financial Conglomerate, as well as improving reporting processes when business activities, products, transactions, and material risk factors change. To assess the intra-group material financial relationship between FSIs in the BNI Financial Conglomeration, it is measured based on the value of BNI's financial transactions with FSIs that are members of the BNI Financial Conglomeration, as well as between fellow FSIs within the BNI Financial Conglomeration.
4. Intra-Group Transaction Risk Control
   To implement risk control, BNI, as the Main Entity (PIKK), ensures that the BNI Financial Conglomerate has control methods in place for intra-group transaction risks that could jeopardize the business continuity of the conglomerate. Intra- group transaction risk controls are implemented by considering:
   a. The composition of inherent risk parameters for intra-group transactions in the integrated risk profile assessment;
   b. Adherence to the arm's length principle (fair transaction terms) for intra-group transactions;
   c. Availability and completeness of intra-group transaction documentation; and
   d. Compliance with legal/regulatory provisions for each intra-group transaction.

5. Intra-Group Transaction Risk Management Information System includes:
   a. Intra-group transaction risk profile reports, which are part of the integrated risk profile report;
   b. Intra-group transaction reports, which include:
      i) Recap of transactions with related parties;
      ii) Important agreements with related parties.

BNI, as the Main Entity (PIKK), prepares and submits intra-group transaction risk profile reports to OJK semi-annually, as part of the integrated risk profile and intra-group transaction reports for the June and December reporting periods. As of December 31, 2025, all intra-group transactions have been conducted fairly and in compliance with the arm's length principle.

Implementation of Aspects and Principles of Corporate Governance in Accordance with Financial Services Authority Regulations [ACGS C.2.6]

Referring to POJK No. 21/POJK.04/2015 on the Implementation of Corporate Governance Guidelines for Public Companies and SEOJK No. 32/SEOJK.04/2015 on the Corporate Governance Guidelines for Public Companies, BNI adopts five aspects, eight principles, and twenty-five recommendations for good corporate governance practices. The following table provides a more detailed explanation of these aspects and their implementation at BNI in 2025:

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
A.	**Aspect A: Relationship of Public Companies with Shareholders in Guaranteeing Shareholder Right**				
1.	Principle 1: Increasing the Value of Holding General Meetings of Shareholders (GMS).				
1.1.	Public Companies have technical methods or procedures for collecting votes, both openly and secretly, which prioritize independence and the interests of shareholders.	At the 2025 Annual GMS held on March 26, 2025, to discuss the Bank's performance in 2024, and the 2025 Extraordinary GMS held on December 15, 2025, voting was conducted using both physical ballots and an electronic voting system provided by eASY.KSEI. The vote counting process as the basis for decision making was carried out by PT Datindo Entrycom as the Securities Administration Bureau, and the results were validated by Ashoya Ratam, S.H., M.Kn., a notary in Jakarta. The voting procedure, both openly and secretly, was carried out in accordance with the GMS rules of procedure. In addition, the procedure for calculating the quorum, questions and answers, and the mechanism for making decisions at the meeting have been regulated in the GMS Rules of Procedure and implemented in accordance with OJK Regulation No. 15/POJK.04/2020 concerning the Planning and Implementation of General Meetings of Shareholders of Public Banks, and OJK Regulation No. 16/POJK.04/2020 concerning the Implementation of General Meetings of Shareholders of Public Banks Electronically.	√		Chapter 7. Corporate Governance, Sub-chapter General Meeting of Shareholders, Page 673-698.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
1.2.	All members of the Board of Directors and members of the Board of Commissioners of the Public Company were present at the Annual GMS.	All members of the Board of Directors and the Board of Commissioners of BNI attended the 2025 Annual GMS and the 2025 Extraordinary GMS. BNI has submitted a Summary Report of the Minutes of the 2025 Annual GMS for the 2024 Fiscal Year and the 2025 Extraordinary GMS to the Financial Services Authority (OJK) through Letters No. CSE/7/2206 dated March 27, 2025 and No. CSE/7/9256 dated December 16, 2025.	√		Chapter 7. Corporate Governance, Sub-chapter General Meeting of Shareholders, Page 673-698.
1.3.	The summary of the minutes of the GMS is available on the Public Company Website for at least 1 (one) year.	The Summary of the Minutes of the 2025 Annual GMS has been published on the official BNI website, which can be accessed via the following link: https://www.bni.co.id/id-id/perseroan/tata-kelola/rups The Summary of the Minutes of the previous year's GMS is also still published on the official BNI website.	√		
2.	Principle 2: Improving the Quality of Communication of Public Companies with Shareholders or Investors.				
2.1.	Public Companies have a communication policy with shareholders or investors.	The communication policy with Shareholders or investors is stated in the Investor Relations Guidelines. These guidelines include policies related to investor relations activities, such as analyst meetings, preparation of annual reports, investor meetings, public exposes, and roadshows. The policy also includes strategies, programs, communication implementation times, and guidelines that allow Shareholders or investors to actively participate in communication. The existence of this policy demonstrates the Bank's commitment as a Public Company to implementing transparent and open communication with Shareholders and investors. In 2025, as a form of implementing this policy, the Bank has held analyst meetings, annual reports, and public exposes, and published them on the PT Bursa Efek Indonesia website and the official BNI website.	√		Chapter 7. Corporate Governance, Sub-chapter Investor Relations, Page 958-961.
2.2.	Public Companies disclose the Public Company's communication policy with shareholders or investors on the Website.				
B.	**Aspect B:** **Functions and Roles of the Board of Commissioners**				
3.	Principle 3: Strengthening the Membership and Composition of the Board of Commissioners.				
3.1.	Determination of the number of members of the Board of Commissioners takes into account the conditions of the Public Company.	As of December 31, 2025, the number of members of the BNI Board of Commissioners is 6 (six) people. Determination of the number and composition of the Board of Commissioners has taken into account the conditions, organizational needs and complexity of BNI's business as a Public Company and meets the criteria in accordance with OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 Implementation of Governance for Commercial Banks.	√		Chapter 7. Corporate Governance, Sub-chapter Diversity of the Board of Commissioners and Board of Directors, Page 673-698.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
3.2.	The determination of the composition of the Board of Commissioners members takes into account the diversity of expertise, knowledge, and experience required.	The current composition of the Board of Commissioners has reflected adequate diversity, with a combination of various important aspects such as independence, expertise and educational background, diverse work experience, and varying age ranges. This diversity is expected to support more comprehensive and balanced decision-making, and ensure that the Board of Commissioners can carry out its functions effectively in overseeing the Bank's operations. This is in accordance with the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.	√		Chapter 3. Company Profile, Sub-chapter Board of Commissioners Profile, Page 110-115. Chapter 7. Corporate Governance, Sub-chapter Diversity of the Board of Commissioners and Board of Directors, Page 673-698.
4.	Principle 4: Improving the Quality of Implementation of the Duties and Responsibilities of the Board of Commissioners.				
4.1.	The Board of Commissioners has a self-assessment policy to assess the performance of the Board of Commissioners.	The self-assessment policy is used to assess the performance of the Board of Commissioners based on the achievement of the work program listed in the Board of Commissioners' Work Plan and Budget (RKA). This assessment includes indicators related to the duties and responsibilities of the Board of Commissioners, which are also included in the GCG Self Assessment. The performance assessment of the Board of Commissioners is described through three main indicators, namely advisory on performance, strengthening executive functions, and monitoring compliance. The GCG Self Assessment consists of three main benchmarks: Governance Structure, Governance Process, and Governance Outcome. Governance Structure includes 18 indicators, Governance Process consists of 23 indicators, and Governance Outcome has 5 indicators.	√		Chapter 7. Corporate Governance, Sub-chapter Performance Assessment of the Board of Directors and Board of Commissioners, Page 806-826.
4.2.	The self-assessment policy to assess the performance of the Board of Commissioners is disclosed through the Annual Report of the Public Company.	Disclosure of the Self-Assessment policy on the performance of the Board of Commissioners listed in the RKA has been described in the 2025 Annual Report. In addition, BNI has also submitted a report on the results of the GCG Self Assessment related to the duties and responsibilities of the Board of Commissioners to the regulator.	√		Chapter 7. Corporate Governance, Sub-chapter Performance Assessment of the Board of Directors and Board of Commissioners, Page 806-826.
4.3.	The Board of Commissioners has a policy regarding the resignation of members of the Board of Commissioners if they are involved in financial crimes.	The policy regarding the resignation of the Board of Commissioners is regulated in the Board of Commissioners Charter. In order to maintain the integrity of the Bank and ensure compliance with the law and GCG principles, BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of involvement of members of the Board of Commissioners in financial crimes.	√		Chapter 7. Corporate Governance, Sub-Chapter Board of Commissioners, Page 699-810. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration, Page 811-826. Chapter 7. Corporate Governance, Sub-Chapter Anti-Money Laundering Program, Prevention of Terrorism Financing, and Prevention of Proliferation Financing of Weapons of Mass Destruction (APU, PPT, and PPPSPM), Page 1083-1086.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
4.4.	The Board of Commissioners or the Committee that carries out the Nomination and Remuneration function prepares a succession policy in the Nomination process for members of the Board of Directors.	One of the organs of the Board of Commissioners is the Nomination and Remuneration Committee, which functions to carry out nomination duties. This committee assists 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 set as evaluation materials. This assessment is carried out by referring to BUMN regulation No. PER-3/MBU/03/2023 of 2023.	√		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Page 855-868.
C.	**Aspect C: Functions and Roles of the Board of Directors**				
5.	Principle 5: Strengthening the Membership and Composition of the Board of Directors.				
5.1.	Determination of the number of members of the Board of Directors takes into account the conditions of the Public Company and the effectiveness of decision-making.	As of December 31, 2025, the number of members of the BNI Board of Directors is 13 (thirteen) people. Determination of the number and composition of the Board of Directors has taken into account the conditions, organizational needs and complexity of BNI's business as a Public Company and meets the criteria in accordance with OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 Implementation of Governance for Commercial Banks.	√		Chapter 7. Corporate Governance, Sub-chapter Diversity of the Board of Commissioners and Board of Directors, Page 673-698.
5.2.	The determination of the composition of the Board of Directors members takes into account the diversity of expertise, knowledge, and experience required.	The current composition of the Board of Directors has reflected adequate diversity, with a combination of various important aspects such as independence, background expertise and education, diverse work experience, and varying age ranges. This diversity is expected to support more comprehensive and balanced decision-making, and ensure that the Board of Commissioners can carry out its functions effectively in overseeing the running of the company. This is in accordance with the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.	√		Chapter 3. Company Profile Sub-Chapter Director Profile, Page 120-132. Chapter 7. Corporate Governance, Sub-chapter Diversity of the Board of Commissioners and Board of Directors, Page 673-698.
5.3.	Members of the Board of Directors who oversee the accounting or finance sector have expertise and/or knowledge in the field of accounting.	The Director of Finance, Hussein Paolo Kartadjoemena, has an educational background in accounting economics and throughout 2025 has improved his competence in this field.	√		
6.	Principle 6: Improving the Quality of Implementation of Duties and Responsibilities of the Board of Directors				
6.1.	The Board of Directors has its own self-assessment policy to assess the performance of the Board of Directors.	The Board of Directors' performance assessment policy is regulated in the Guiding Principle Key Performance Indicator (KPI) of the Board of Directors. This performance measurement includes several KPIs that are assessed collegially for all Directors, both in quantitative and qualitative forms. The assessment involves several factors, such as market capitalization, profit, market share, and leadership. The Nomination and Remuneration Committee has conducted an evaluation and provided recommendations to the Board of Commissioners regarding the nomination and remuneration system or policy for Commissioners, Directors, executive officers, and employees as a whole.	√		Chapter 7. Corporate Governance, Sub-Chapter Performance Assessment of the Board of Directors and Board of Commissioners, Page 806-810.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
6.2.	The selfassessment policy for assessing the performance of the Board of Directors is disclosed through the annual report of the Public Company.	In 2025, the performance assessment of the Board of Directors has been disclosed in the Annual Report, which can be accessed by Shareholders, investors, and other stakeholders through the official BNI website. This information is very useful for providing assurance to Shareholders and investors that the management of the company continues to be carried out in a better direction.	√		Chapter 7. Corporate Governance, Sub-Chapter Performance Assessment of the Board of Directors and Board of Commissioners, Page 806-810.
6.3.	The Board of Directors has a policy regarding the resignation of members of the Board of Directors if they are involved in financial crimes	BNI has a clear policy regarding the resignation of members of the Board of Directors and will take firm action if financial crimes occur. This policy is regulated in the Articles of Association and the Board of Directors Charter. In order to maintain the integrity of the Bank and ensure compliance with the law and GCG principles, BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of involvement of members of the Board of Directors in financial crimes.	√		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Page 742-804. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration, Page 811-826. Chapter 7. Corporate Governance, Sub-Chapter Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (APU, PPT, and PPPSPM) Programs, Page 1083-1086.
D.	**Aspect D: Stakeholder Participation**				
7.	Principle 7: Enhancing Corporate Governance Aspects through Stakeholder Participation.				
7.1.	Public Companies have policies to prevent insider trading.	BNI has a comprehensive policy to prevent insider trading, which is outlined in the Company Guidelines (e-PP). This policy provides clear guidance to all employees, including members of the Board of Directors and Board of Commissioners, regarding the use and disclosure of unpublished insider information. In an effort to prevent insider trading practices, BNI also establishes reporting procedures for employees who suspect violations related to such information. To support the implementation of this policy, BNI periodically holds training so that employees understand and comply with applicable provisions. With these steps, BNI aims to create a culture of transparency and accountability, as well as increase public trust in the integrity of financial institutions in managing sensitive information.	√		Chapter 7. Corporate Governance, Sub-Chapter Insider Trading and Conflict of Interest Policy, Page 1112-1113.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
7.2.	Public Company has an anticorruption and anti-fraud policy.	In its operational activities, BNI always complies with OJK Regulation No. 12 of 2024 concerning the Implementation of Anti-Fraud Strategies for Financial Services Institutions. BNI is committed to fostering anti-fraud culture and awareness throughout all levels of the organization. The implementation of anti-fraud policies and strategies is carried out through the application of the Zero Tolerance Fraud principle. To ensure that business activities are free from corruption, bribery, and fraud, BNI has formed several organizations, such as the Gratification Control Unit (UPG), the Anti-Fraud Unit, and the Anti-Fraud Committee. In addition, BNI also implements strict policies and procedures to enforce the principles of anti-corruption, antibribery, and anti-fraud, including the signing of an integrity pact by employees, the Board of Directors, and the Board of Commissioners every year, the Declaration of Gratification and Anti-Bribery periodically, and ISO 37001:2016 Certification on the Anti-Bribery Management System (SMAP).	√		Chapter 7. Corporate Governance, Sub-Chapter Internal Fraud, Page 1115-1117. Chapter 7. Corporate Governance, Sub-Chapter Anti-Corruption Policy, Page 1087.
7.3.	Public Companies have policies on supplier or vendor selection and capacity building.	BNI has a supplier or vendor selection and capacity building policy outlined in the Company Guidelines (e-PP). This policy covers procurement procedures, including methods and process flows, and is applied consistently in every procurement of goods and/or services.This policy serves as a guideline for all employees in carrying out the procurement process. BNI requires that providers of goods and/or services required have been registered in the manual system or e-Procurement application. In addition, the procurement winner notification process is carried out transparently to ensure accountability.	√		Chapter 7. Corporate Governance, Sub-Chapter Goods and/or Services Procurement Policy, Page 1092-1096.
7.4.	Public Companies have policies regarding the fulfillment of creditor rights.	Policies related to creditor rights at BNI are regulated through an agreement agreed between BNI and creditors. This agreement clearly states the rights and obligations of each party, including BNI's obligation to fulfill creditor rights. BNI is committed to providing transparent, accurate, and timely information, both regarding requests and use of loans. In addition, BNI is also obliged to maintain financial ratios, such as Current Ratio, Debt to Equity Ratio (DER), and Debt Service Ratio, in accordance with the agreed provisions. Annual audited financial reports are also submitted to creditors within a specified time period.	√		Chapter 7. Corporate Governance, Sub-Chapter Protection of Creditors' Rights, Page 1106.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
7.5.	Public Companies have a whistleblowing system policy.	The management of the Whistleblowing System (WBS) at BNI, known as "WBS to CEO," is a manifestation of the Bank's commitment to creating a clean and integrity-based work environment. This system encourages the active participation of BNI Hi-Movers to report any violations that occur within the Bank. Violation reports through WBS can be submitted through various channels, such as telephone, email, letter, or website, thus facilitating access and ensuring the confidentiality of the reporter.	√		Chapter 7. Corporate Governance, Sub-Chapter Whistleblowing System, Page 1127-1130.
7.6.	Public Companies have a policy of providing long-term incentives to Directors and employees.	BNI implements a policy of providing long-term performance-based compensation as a form of appreciation to management and employees who make significant contributions. This policy is realized through a stock ownership scheme, namely the Management Stock Ownership Program (MSOP) and the Employee Stock Ownership Program (ESOP). This policy is expected to encourage sustainable performance improvements and align employee interests with the Bank's goals. The provision of long-term compensation for members of the Board of Directors and Independent Board of Commissioners in the form of MSOP is guided by OJK Regulation No. 45/POJK.03/2015 concerning Remuneration Governance for Commercial Banks, as well as Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises. In addition, the Employee Stock Allocation (ESA) Program provides an opportunity for employees who meet certain criteria to own shares, in accordance with the provisions stated in the Program Implementation Instructions.	√		Chapter 7. Corporate Governance, Sub-Chapter Performance-Based Long-Term Compensation Policy, Page 1018-1122.
E.	**Aspect E: Information Disclosure**				
8.	Principle 8: Improve the Implementation of Information Disclosure				
8.1.	Public Companies utilize information technology more widely in addition to Websites as a medium for information disclosure.	In addition to the website, BNI also utilizes various information technologies and social media, such as email, BNI Menyapa, X, Instagram, and TikTok as a means of communication and information dissemination. This information disclosure effort includes not only that required by laws and regulations, but also other information that is considered useful for Shareholders and investors related to BNI's status as a Public Company.	√		Chapter 7. Corporate Governance, Sub-Chapter Access to Company Information and Data, Page 1037-1081.

No.	OJK Recommendation	Implementation at BNI	BNI Compliance with OJK Regulations		Disclosure in the 2025 Annual Report
			Complied	Not Yet Complied	
8.2.	The Public Company Annual Report discloses the ultimate beneficial owner in the Public Company's share ownership of at least 5% (five percent), in addition to the disclosure of the ultimate beneficial owner in the Public Company's share ownership through major and controlling shareholders.	In the 2025 Annual Report, BNI discloses information regarding the ultimate beneficial owner in share ownership, including individuals or entities that own at least 5% (five percent) of the total shares. This disclosure includes major and controlling shareholders, as well as share ownership by the Board of Directors and Board of Commissioners.	√		Chapter 3. Company Profile Sub-Chapter Structure and Composition of Shareholders, Page 180-186. Chapter 3. Company Profile Sub-Chapter Information on Major Shareholders and Controlling Parties of the Company, Page 187. Chapter 7. Corporate Governance, Sub-Chapter Policy for Disclosure of Information on Share Ownership of the Board of Commissioners and the Board of Directors and Its Implementation, Page 1123-1126.

Implementation of the Indonesian Corporate Governance Guidelines (PUGKI) [ACGS C.2.6]

BNI has implemented the principles and recommendations outlined in the Indonesian Corporate Governance Guidelines (PUGKI) issued by the National Committee on Governance Policy (KNKG. In line with BNI's commitment to realize the 4 (four) pillars of corporate governance, namely ethical behavior, accountability, transparency and sustainability, BNI also continues to strive to implement 8 (eight) principles of Indonesian corporate governance. More detailed information on this implementation can be found in the following table:

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.	**Principle 1: Roles and Responsibilities of the Board of Directors and Board of Commissioners**				
1.1	**Roles and Responsibilities of the Board of Directors**				
1.1.1	To achieve the creation of sustainable value, the Board of Directors carries out its leadership role and strives to achieve the following governance outcomes: a. competitive and focused on long-term performance; b. ethical and responsible in conducting business; c. contributes positively to society and the environment; and d. capable of resilience and growth (corporate resilience).	In carrying out its duties and functions, the Board of Directors focuses on long-term performance, upholds business ethics, takes responsibility for the environment and society, and consistently makes improvements for sustainable growth.	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Directors, Pages 742-806.
1.1.2	The Board of Directors must ensure that the mission, vision, goals, objectives, strategies, and annual and medium-term corporate plans are consistent with long-term objectives, by effectively utilizing innovation and technology.	The Board of Directors ensures that the corporate vision and mission align with the Bank's strategic plan and long-term objectives, by effectively utilizing innovation and technology. A strong commitment to developing technology infrastructure and digital innovation is a key step in supporting the achievement of these goals. By considering stakeholder expectations, innovation is placed at the core of strategy and operational oversight. The Board of Directors also encourages continuous innovation, including the development of business models, new products, new services, and collaboration with strategic partners.	√		Chapter 3. Company Profile, Sub-Chapter: Vision, Mission, and Corporate Culture, Pages 94-98. Chapter 7. Corporate Governance, Sub-Chapter: Bank's Strategic Plan, Pages 1131-1137. Chapter 7. Corporate Governance, Sub-Chapter: Reporting Integrity and Information Technology Systems, Pages 1111.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.1.3	The Board of Directors ensures that the corporation implements appropriate and effective risk management and internal control systems that align with the corporate vision, mission, goals, objectives, and strategies, and comply with applicable laws and standards.	The Board of Directors has ensured that the corporation applies appropriate and effective risk management and internal control systems, aligned with the vision, mission, and strategic plan. The implementation of risk management and internal control systems is carried out effectively, proactively, and with a forward-looking approach, in accordance with applicable laws and standards. This step aims to support the achievement of sustainable performance and enhance competitiveness.			Chapter 7. Corporate Governance, Sub-Chapter: Internal Control System, Pages 996-1006. Chapter 7. Corporate Governance, Sub-Chapter: Risk Management System, Pages 1007-1024.
1.1.4	The Board of Directors ensures the integrity of the corporation's accounting and financial reporting systems and the timely and accurate disclosure of all material information regarding the corporation.	The Board guarantees the integrity of the corporation's accounting and financial reporting systems and ensures the timely and accurate disclosure of all material information regarding the Bank as part of the Bank's risk management implementation. The Board also ensures that each individual involved in the preparation and disclosure of information possesses relevant knowledge, skills, and experience, as reflected in certifications from reputable institutions, and ensures the availability of adequate resources. In approving information disclosure, including periodic financial reports, the Board considers the effectiveness of the internal control system, the opinion of the external auditor, and the opinions of the Audit Committee, as well as consistency with the Bank's goals and strategies. The results of the review of the Quarterly Financial Statements are published along with the report, providing valuable information for investors and analysts to assess the Bank's financial performance.	√		Chapter 7. Corporate Governance, Sub-Chapter: Internal Control System, Pages 996-1006. Chapter 7. Corporate Governance, Sub-chapter: Transparency in Reporting, page 1138.
1.1.5	The Board of Directors ensures that the sustainability report has been properly prepared.	The Board ensures the implementation of sustainability principles and the preparation of the sustainability report in accordance with applicable laws and regulations and standards. This report is prepared based on a reporting framework that takes into account the size and complexity of the corporation, and meets national and/or global standards. Therefore, the sustainability report reflects the corporation's practices that support the creation of sustainable value.	√		Chapter 9. ESG Commitment, Sub-chapter: ESG Index: Summary of BNI Sustainability Practices, pages 1240-1244.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.1.6	The Board of Directors establishes a framework for corporate information technology (IT) governance that aligns with the corporation's business needs and priorities, drives business opportunities and performance, strengthens risk management, and supports the corporation's goals and strategies.	The Board consistently develops and updates the IT governance framework to align with the Bank's business needs and priorities. IT resource allocation policies are implemented to ensure that investments and resource allocations are optimal and adequate. The implementation of IT governance is realized through aligning the IT Strategic Plan with the Bank's business strategy, optimizing resources, effective use of IT, performance measurement, and applying risk management in compliance with applicable regulations. Furthermore, the Board ensures that the Bank's risk management covers IT risks, and IT security policies and procedures are implemented to safeguard the security and confidentiality of data.	√		Chapter 5. Business Support Functions, Sub-chapter: Information Technology Governance, pages 487-493. Chapter 7. Corporate Governance, Sub-chapter: Reporting Integrity and Information Technology Systems, pages 1111.
1.1.7	For corporations operating based on Sharia principles, the Board of Directors must ensure the authority and availability of adequate supporting devices so that the Sharia Supervisory Board can perform its role effectively.	As of the end of 2024, BNI does not conduct business activities based on Sharia principles. Therefore, this provision is not relevant to BNI.	√		
1.1.8	The Board of Directors' Charter is periodically reviewed. The Charter includes, among other things, the division of roles for each Director, which can be arranged in the Board of Directors' Charter or by a Board of Directors' decision letter.	The Board of Directors' Charter is reviewed regularly to ensure its relevance and alignment with the latest developments in governance practices. This review process includes an evaluation of the duties and authority of each Director, as well as necessary adjustments to improve the Bank's operational effectiveness and efficiency. Additionally, this guideline serves as a reference for Board members in carrying out their responsibilities, thereby promoting transparent and accountable decision-making practices.	√		Chapter 7. Corporate Governance, Sub-chapter: Board of Directors, pages 742-805.
1.1.9	The Board of Directors has a policy regarding the resignation of Board members if they are involved in financial crimes and are proven to have committed wrongdoing.	BNI has a clear policy regarding the resignation of Board members. This policy is written and outlined in the Articles of Association and the Board of Directors' Charter. To maintain integrity and ensure compliance with the law and principles of GCG, BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of Board members' involvement in financial crimes. BNI has also implemented POJK No. 8 of 2023 regarding the Implementation of the APU PPT and PPPSPM Programs in the Financial Services Sector. This commitment is reflected in all operational activities, including the identification, monitoring, and reporting of suspicious transactions.	√		Chapter 7. Corporate Governance, Sub-chapter: Board of Directors, pages 742-805. Chapter 7. Corporate Governance, Sub-Chapter: Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation of Weapons of Mass Destruction (AML, CFT, and PPPSPM) Programs, pages 1083-1086.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.2	**Role and Responsibilities of the Board of Commissioners**				
1.2.1	The Board of Commissioners conducts an objective and independent annual formal evaluation to determine the effectiveness of the Board of Directors and each individual Director.	The performance assessment of the Board of Directors, including the President Director of the Bank, is conducted periodically based on the parameters set in the Board of Directors' Key Performance Indicators (KPIs), both collectively and individually. The calculation of the achievement of the Board of Directors' KPIs will be reviewed by the Public Accounting Firm (KAP) that audits the Bank's financial statements. The results of this review are then evaluated by the Board of Commissioners, taking into account recommendations from the Nomination and Remuneration Committee. Subsequently, the Board of Commissioners' evaluation results of the Board of Directors' performance are reported to the Ministry of State-Owned Enterprises as the controlling shareholder of the Bank.	√		Chapter 7. Corporate Governance, Sub-Chapter: Performance Assessment of the Board of Directors and the Board of Commissioners, pages 806-810.
1.2.2	The Board of Commissioners, by taking into account the consideration of the Nomination and Remuneration Committee, is responsible for determining the performance evaluation criteria and assessing the performance of the President Director and other Board members.		√		
1.3	**Role and Responsibilities of the Board of Commissioners**				
1.3.1	The Board of Commissioners reviews the corporate strategy at least annually and approves the mission, vision, and strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves the corporation's business plan, long-term financial plan, and short-term financial plan. The Board of Commissioners provides advice and monitors the Board of Directors' management of its implementation. The Board of Directors and the Board of Commissioners are involved in decisions that are critical to the corporation, as outlined in the corporation's articles of association.	The Board of Commissioners reviews the corporate strategy annually by approving the Bank's Business Plan (RBB), the Corporate Work Plan and Budget (RKAP), as well as revisions to the RBB and RKAP. Additionally, the Board of Commissioners provides advice and counsel and monitors the implementation of policies, their implementation, and the performance of the Bank, which is the responsibility of the Board of Directors. The supervisory function of the Board of Commissioners is carried out regularly through Board of Commissioners' meetings, which invite the Board of Directors every four months. Furthermore, the Board of Commissioners also prepares the RBB Supervision Report, which is submitted to the relevant authorities every semester.	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, pages 699-738.
1.3.2	The types of decisions that require the approval of the Board of Commissioners must be disclosed in the annual report.	BNI's Articles of Association stipulate that the Board of Commissioners has the obligation to provide written approval for legal actions taken by the Board of Directors. This approval must be made in accordance with the provisions set out in BNI's Articles of Association, with due observance of the prevailing laws and regulations as well as provisions in the Capital Market.	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, in the discussion titled "Decisions of the Board of Directors Requiring the Approval of the Board of Commissioners," pages 733-734.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
		Disclosure of the type of decision requiring Board of Commissioners' approval has also been disclosed in the Annual Report, which among others states that the Board of Commissioners is authorized to approve matters requiring Board of Commissioners' approval based on the prevailing laws and regulations and the Company's Articles of Association, including the Bank's Business Plan, Corporate Budget Work Plan, Corporate Plan, Recovery Plan, Internal Audit Annual Audit Plan, and Sustainable Finance Action Plan. Information related to this matter has been disclosed in the 2024 Annual Report.			
1.3.3	Taking into account the recommendations of the Nomination and Remuneration Committee, the Board of Commissioners proposes to, and for decision by, the GMS the appointment and/or dismissal of members of the Board of Directors and the Board of Commissioners. In making the proposal, the Board of Commissioners considers diversity, non-discriminatory elements, and provides equal opportunities without distinguishing between ethnicity, religion, race, inter-group relations, and gender. The Board of Commissioners ensures that the process of nominating and selecting members of the Board of Directors and the Board of Commissioners is formal and transparent.	The Board of Commissioners ensures that the process of nominating and selecting members of the Board of Directors and the Board of Commissioners is formal and transparent. The nomination and selection procedures follow the applicable regulatory provisions. The procedure begins with a meeting of the Nomination and Remuneration Committee to provide recommendations to the Board of Commissioners regarding the appointment and/or dismissal of members of the Board of Directors and the Board of Commissioners. After that, the Board of Commissioners proposes it to the shareholders for decision at the GMS. The Board of Commissioners has considered diversity, non-discriminatory elements, and provides equal opportunities without distinction based on ethnicity, religion, race, inter-group relations, and gender.	√		Chapter 7. Corporate Governance, Sub-Chapter: Nomination and Remuneration, pages 811-826.
1.3.4	The Board of Commissioners or the committee performing the nomination function develops a succession policy in the nomination process for members of the Board of Directors. Each year, the Board of Commissioners reviews the implementation report of the development and succession plan submitted by the President Director.	The Nomination and Remuneration Committee develops the Succession Policy in the nomination process for members of the Board of Directors, which is then recommended to the Board of Commissioners. Each year, the Board of Commissioners reviews the implementation report of the development and succession plan.	√		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration, in the discussion entitled Director Succession Policy, Page 815.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.3.5	The Board of Commissioners: a) Proposes to the GMS, which may be preceded by a proposal from the committee performing the remuneration function, the amount of remuneration for members of the Board of Directors and the Board of Commissioners that aligns with the sustainable development of the corporation and the long-term interests of the corporation and shareholders; b) Periodically reviews the remuneration system for the Board of Directors and the Board of Commissioners.	The Nomination and Remuneration Committee, responsible for the remuneration function, proposes the remuneration amount for members of the Board of Directors and the Board of Commissioners. This proposal is made considering the sustainable development as well as the long-term interests of the Bank and shareholders. The Board of Commissioners periodically reviews the remuneration policy and procedures to ensure their alignment with current conditions and applicable regulations.	√		Chapter 7. Corporate Governance, Sub-Chapter: Nomination and Remuneration, pages 811-826.
1.3.6	The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation, and proposes changes if necessary.	The Board of Commissioners is responsible for overseeing the effectiveness of corporate governance policies and their implementation across all levels of the organization, ensuring that the policies applied align with the principles of good governance and applicable regulations. With the support of all the Committees of the Board of Commissioners, the Board of Commissioners performs its oversight function through coordination with the Board of Directors to review and evaluate the implementation of policies. If necessary, the Board of Commissioners proposes changes or adjustments to improve the quality of governance, including the implementation of governance at the Bank and Subsidiaries within the BNI Financial Conglomerate, in accordance with the Integrated Governance concept mandated by OJK Regulations.	√		Chapter 7. Corporate Governance, Sub-Chapter: Integrated Governance Committee, Pages 881-904.
1.3.7	The Board of Commissioners monitors and directs the corporation to implement appropriate and effective risk management and internal control systems that align with the corporation's goals, objectives, and strategies, and comply with applicable regulations, code of conduct, and standards.	The Board of Commissioners, through the Risk Monitoring Committee, has carried out monitoring and oversight, which includes providing advice and guidance to the Board of Directors on the implementation of Risk Management and Internal Control Systems at BNI. The Board of Commissioners periodically reviews and approves the applicable risk appetite. Through the Risk Monitoring Committee, the Board of Commissioners monitors and provides input to ensure that key risks are identified, considering both internal and external factors. Additionally, the Board of Commissioners ensures that the impact and likelihood of risks have been assessed and that appropriate mitigation strategies and plans are in place. Periodically, the Board of Commissioners also monitors the effectiveness of risk management and internal control systems.	√		Chapter 7. Corporate Governance, Sub-Chapter: Risk Oversight Committee, Pages 868-881.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.3.8	The Board of Commissioners supervises and directs the achievement of integrity in the corporation's accounting and financial reporting systems, as well as the independence of internal and external audit functions.	The Board of Commissioners has discussed with the Board of Directors the appointment of the Public Accounting Firm that will function as the External Auditor to audit BNI's 2024 Annual Financial Statements and other reports. This discussion also covers the audit plan for the following year and annual consultations, with the aim of achieving integrity in accounting and financial reporting systems, as well as ensuring the independence of both internal and external audit functions. Before approving the financial statements, the Board of Commissioners receives a statement from the President Director and Finance Director that the entity's financial records have been properly managed. The financial statements have also been prepared in accordance with applicable accounting standards and fairly present the corporation's financial position and performance.	√		Chapter 7. Corporate Governance, Sub-Chapter: Audit Committee, Pages 833-854.
1.3.9	The Board of Commissioners monitors, reviews, and approves the corporation's annual report and sustainability report, ensuring their integrity, and supervises the corporation's disclosure and communication processes.	The Board of Commissioners has monitored, reviewed, and approved BNI's 2024 Annual Report and Sustainability Report, ensuring their integrity. Additionally, the Board of Commissioners supervises the corporation's disclosure and communication processes, including ensuring that information related to the Board of Commissioners is included in the Annual Report. Thus, the disclosure of governance practices in the Annual Report is ensured to have been properly implemented during the 2024 fiscal year.	√		Chapter 2. Management Report, Sub-Chapter Board of Commissioners Report, Pages 48-60. Chapter 2. Management Report, Sub-Chapter Statement Letter from Board of Commissioners Members regarding Responsibility for the 2025 Annual Report, Pages 84-85.
1.3.10	The Board of Commissioners' Charter is periodically reviewed.	The Board of Commissioners has a Charter that includes various provisions such as the Code of Conduct for Board of Commissioners meetings and joint meetings with the Board of Directors, and servesasthe primaryreference forcarrying out the Board's duties and functions. Additionally, the supporting committees of the Board of Commissioners each have their own Committee Charter, which guides them in performing their duties and responsibilities. All of these guidelines are reviewed periodically and adjusted to comply with applicable laws and regulations before being approved by the Board of Commissioners. In 2024, the Board of Commissioners conducted a review and ensured that these guidelines comply with the relevant legal provisions.	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, Pages 699-738. Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Pages 833-854. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Pages 855-868. Chapter 7. Corporate Governance, Sub-Chapter Risk Monitoring Committee, Pages 868-881. Chapter 7. Corporate Governance, Sub-Chapter Integrated Governance Committee, Pages 881-904

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.3.11	The Board of Commissioners has a policy regarding the resignation of Board members if they are involved in financial crimes and proven to have committed wrongdoing.	The policy on the resignation of the Board of Commissioners is regulated in the Articles of Association and the Board of Commissioners' Charter. To maintain the integrity of the Bank and ensure compliance with the law as well as the principles of Good Corporate Governance (GCG), BNI will take firm action and will not hesitate to enforce appropriate sanctions if there is evidence of a Board member's involvement in financial crimes. As part of the law enforcement efforts, BNI has implemented OJK Regulation No. 8 of 2023 concerning the Application of Anti- Money Laundering (APU) and Prevention of Terrorism Financing (PPT) Programs, and the Prevention of Financial Services Sector Money Laundering (PPPSPM).	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, Pages 699-738. Chapter 7. Corporate Governance, Sub-Chapter: Nomination and Remuneration, Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter: Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation of Weapons of Mass Destruction (AML, CFT, and PPPSPM) Programs, Pages 1083-1086.
1.3.12	Independent Commissioners are highly expected to contribute to honest, objective, active, and constructive discussions in Board of Commissioners meetings.	BNI ensures that all Independent Commissioners serving in 2024 have no financial, managerial, ownership, and/or family relationships with members of the Board of Directors, other members of the Board of Commissioners, controlling shareholders, or the Bank. This independence condition reflects the objectivity of Independent Commissioners in carrying out their duties, as well as their active, objective, and constructive roles in executing their functions. The appointment and dismissal of BNI's Independent Commissioners have met the criteria and followed the procedures set forth in the applicable laws and regulations. As such, Independent Commissioners are ensured to perform their duties independently.	√		Chapter 7. Corporate Governance, Sub-Chapter: Independent Commissioners, Pages 739-741

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
1.3.13	The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner fosters a culture of openness and constructive dialogue that allows various viewpoints to be expressed, including coordinating the setting of appropriate board meeting agendas and ensuring sufficient time is available to discuss all items. Additionally, there must be opportunities for the Board of Commissioners to meet with the Board of Directors and senior management.	The President Commissioner has optimally performed his role, both as the coordinator of the Board of Commissioners in ensuring the effectiveness of its duties and responsibilities, and in fulfilling his role as the Chair of the Integrated Governance Committee and the Nomination and Remuneration Committee. The active role of the President Commissioner is evident in leading the Board of Commissioners' meetings according to the agenda that must be discussed, including in the decision-making process in a collegial manner. Furthermore, the President Commissioner coordinates the division of supervisory roles among the members of the Board of Commissioners, leads meetings, and represents the Board of Commissioners in dealings with external parties.	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, Pages 699-738.
1.4	**Establisment of the Committee**				
1.4.1	The corporation has committees under the Board of Commissioners, at a minimum consisting of: the Audit Committee, the Nomination and Remuneration Committee, and the Risk Management Monitoring Committee.	To support the implementation of supervisory duties and functions, the Board of Commissioners has established committees under the Board of Commissioners, consisting of the Nomination and Remuneration Committee, the Integrated Governance Committee, the Risk Monitoring Committee, and the Audit Committee.	√		Chapter 7. Corporate Governance, Sub-Chapter: Committees Under the Board of Commissioners, Pages 833-904.
1.4.2	The Board of Commissioners ensures that all members of the Audit Committee are independent, and that other committees established by the Board of Commissioners are predominantly composed of independent members. Furthermore, all committee members possess the necessary competence, commitment, and authority to perform their roles effectively and independently.	The Board of Commissioners ensures that all members of the Audit Committee, consisting of Independent Commissioners and Independent Parties (Non-Commissioners), carry out their duties and responsibilities independently. All members of the Audit Committee are confirmed to have the required competence and capabilities to meet the needs of the Audit Committee's tasks. The Audit Committee has a Committee Charter that serves as a guideline for carrying out its duties. The Audit Committee Charter outlines various provisions, including: Independence Criteria, Duties and Responsibilities, and the Authority of the Audit Committee. The Audit Committee has several authorities, including the right to obtain information, meet with relevant parties in connection with its duties (with or without the presence of management), and seek advice from independent external consultants/ experts if necessary.	√		Chapter 7. Corporate Governance, Sub-Chapter: Audit Committee, Pages 833-854.

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			Comply	Not yet	
1.4.3	To ensure that the monitoring of the Audit Committee's duties is carried out objectively and independently, the President Commissioner shall not serve as the Chairman of the Audit Committee, except in extraordinary circumstances that must be explained in the annual report.	The Board of Commissioners ensures that the President Commissioner does not hold the position of Chairman of the Audit Committee, in order to maintain independence and objectivity in the execution of the supervisory function. In 2024, the position of Chairman of the Audit Committee was held by an Independent Commissioner with adequate competence and experience, enabling them to carry out the oversight duties effectively and in accordance with GCG principles.	√		Chapter 7. Corporate Governance, Sub-Chapter: Audit Committee, Pages 833-854.
1.5	**Performance Assessment – Board of Commissioners and its Members**				
1.5.1	The Board of Commissioners conducts an objective annual formal evaluation to determine the effectiveness of the Board, its committees, and each individual commissioner.	A self-assessment policy is used to evaluate the performance of the Board of Commissioners based on the achievement of work programs outlined in the Work Plan and Budget (RKA) of the Board of Commissioners. This evaluation includes indicators related to the duties and responsibilities of the Board of Commissioners, which are also part of the GCG Self-Assessment. The performance evaluation of the Board of Commissioners is reflected through three main indicators: advisory on performance, strengthening the executive function, and monitoring compliance. The GCG Self-Assessment consists of three main benchmarks: Governance Structure, Governance Process, and Governance Outcome. Periodically, the Board of Commissioners also evaluates the committees under its authority, including the Audit Committee, Risk Monitoring Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and the Integrated Governance Committee.	√		Chapter 7. Corporate Governance, Sub-Chapter: Performance Assessment of the Board of Directors and Commissioners, Pages 806-810.
1.6	**Conflict of Interest**				
1.6.1	Board members who hold concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A commissioner must notify the Board of Commissioners and the chair of the committee performing the nomination function before accepting a new appointment as a director or commissioner of a public corporation, another directorship, or a position with a significant time commitment.	In the 2025 fiscal year, no members of the Board of Directors held concurrent positions outside of BNI. This is in accordance with the provisions set out in the Minister of State-Owned Enterprises Regulation No. PER-3/MBU/03/2023 on the Organization and Human Resources of State-Owned Enterprises and OJK Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks.	√		Chapter 3. Company Profile, Sub-Chapter: Directors Profile, Pages 120-132. Chapter 7. Corporate Governance, Sub-Chapter: Diversity of the Board of Commissioners and Directors, Pages 827-829.

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1.6.2	The Board of Commissioners monitors and manages potential conflicts of interest among management, members of the Board of Directors, the Board of Commissioners, and shareholders, including the misuse of corporate assets and abuse in related party transactions. Commissioners with conflicts of interest do not participate in monitoring or decision-making regarding potential conflicts of interest involving themselves or their affiliates.	BNI has a policy that prohibits members of the Board of Directors and the Board of Commissioners with conflicts of interest from participating in decision-making (abstaining) related to such conflicts. Each member of the Board of Commissioners must inform the Board of Directors and the Board of Commissioners if there is a potential conflict of interest, including if it arises from their position as a consultant or official at another company. Members of the Board of Directors must also immediately disclose their potential conflicts of interest to the Board of Commissioners and other Board members, and not participate in decision-making if there is a conflict of interest. In its report, the Board of Commissioners informs the General Meeting of Shareholders (GMS) of any material conflicts of interest that have occurred, along with their resolution.	√		Chapter 7. Corporate Governance, Sub-Chapter: Insider Trading and Conflict of Interest Policy, Pages 1112-1113.
1.7	**Competence Improvemenr of Members of the Board of Directors and Board of Commissioners**				
1.7.1	The Board of Commissioners ensures that members of the Board of Directors and the Board of Commissioners understand their roles and responsibilities, the characteristics and operations of the corporation, relevant laws and regulations, applicable standards, and other obligations. The Board of Directors, through the corporate secretary, supports all members of the Board of Directors and the Board of Commissioners in updating and refreshing the skills and knowledge necessary to perform their roles on the Board.	Newly appointed members of the Board of Directors and the Board of Commissioners are required to undergo an adequate Orientation and Introduction Program to understand their roles and responsibilities. Periodically, members of the Board of Directors and the Board of Commissioners participate in relevant, adequate, and ongoing Training and/or Competency Development programs. Additionally, members of the Board of Directors and the Board of Commissioners regularly receive accurate, timely, and clear information regarding the latest developments in laws and regulations, relevant standards, applicable obligations, as well as risk factors and the business environment.	√		Chapter 7. Corporate Governance, Sub-Chapter: Board of Directors, Pages 742-806. Chapter 7. Corporate Governance, Sub-Chapter on the Board of Commissioners, Pages 699-738
2.	**Principle 2:** **Composition and Remuneration of the Board of Directors and Board of Commissioners**				
2.1	**Composition of the Board of Directors**				
2.1.1	In determining candidate directors, 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.	The Board of Commissioners in determining candidate directors does not only rely on recommendations from BNI's internal organs, but also considers the results of assessments from independent external parties. This step is taken to ensure that the process of selecting candidate directors is carried out comprehensively and objectively, so that accountability is maintained.	√		Chapter 7. Corporate Governance, Sub-Chapter on Nomination and Remuneration, Pages 811-826.

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			Comply	Not yet	
2.1.2	The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the knowledge, skills, and expertise needed to properly fulfill the role of the Board of Directors and pay attention to the fulfillment of diversity in the Board of Directors.	The Board of Commissioners ensures that the composition of the Board of Directors reflects the diversity in terms of skills, skills, knowledge, experience, age, cultural background, and gender needed to carry out the duties of the Board of Directors effectively. The number of members of the Board of Directors is determined by considering the conditions of the Bank, in order to ensure a more effective decision-making process. In this composition, there are Directors who have experience in finance, banking, IT, or other expertise needed to serve as members of the Board of Directors.	√		Chapter 3. Company Profile, Sub-Chapter on Directors' Profile, Pages 120-132. Chapter 7. Corporate Governance, Sub-Chapter on Nomination and Remuneration, Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter on Diversity of the Board of Commissioners and Directors, Pages 827-829.
2.1.3	The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.	Diversity in the composition of the Board of Directors and Board of Commissioners is guided by the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 on the Implementation of Governance for Commercial Banks. The Diversity Policy of the Board of Directors and Board of Commissioners is disclosed in the 2025 Annual Report.	√		Chapter 7. Corporate Governance, Sub-Chapter on Diversity of the Board of Commissioners and Directors, Pages 827-829.
2.1.4	The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent so that they can produce the desired composition of the Board. The Board of Commissioners uses independent sources to determine qualified candidates.	The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are carried out clearly and transparently. In the nomination process, the Board of Commissioners may use the services of independent external consultants, and relevant information regarding such consultants is disclosed in the annual report, including information regarding independence and potential conflicts of interest.	√		Chapter 7. Corporate Governance, Sub-Chapter on Nomination and Remuneration, Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter on Diversity of the Board of Commissioners and Directors, Pages 827-829.
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's profile meets the requirements set out in the expertise matrix and nomination criteria.	The Board of Commissioners through the Nomination and Remuneration Committee is responsible for establishing nomination procedures and criteria that are guided by applicable laws and regulations.	√		Chapter 7. Corporate Governance, Sub-Chapter on Nomination and Remuneration, Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Pages 855-868.

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			Comply	Not yet	
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 needed to properly fulfill the role of the Board of Commissioners.	BNI ensures that the composition of the Board of Commissioners reflects the diversity in terms of ability, expertise, knowledge, experience, age, cultural background, and gender needed to carry out the duties and functions of the Board of Commissioners effectively. In the composition of the Board of Commissioners, there are members who have experience in the financial and banking sectors. The number of members of the Board of Commissioners is determined in accordance with the provisions of applicable regulations, and takes into account the conditions of the Bank. Diversity in the composition of the Board of Directors and Board of Commissioners is guided by the Regulation of the Minister of SOEs No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises, OJK Regulation No. 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies, and OJK Regulation No. 17 of 2023 Implementation of Governance for Commercial Banks.	√		Chapter 3. Company Profile, Sub-Chapter Profile of the Board of Commissioners, Pages 110-115. Chapter 7. Corporate Governance, Sub-Chapter Diversity of the Board of Commissioners and Directors, Pages 827-829.
2.1.7	To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles that have the potential for conflict of interest, the Board of Commissioners consists 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.	The number of Independent Commissioners in the composition of the BNI Board of Commissioners has BNI has met the criteria required in POJK No. 17 of 2023, which is a minimum of 50% of the total members of the Board of Commissioners. The number of Independent Commissioners in BNI has also met the minimum number of Independent Commissioners regulated in the ASEAN Corporate Governance Scorecard which requires the number of Independent Commissioners to be 50% (fifty percent) of the total members of the Board of Commissioners.	√		Chapter 7. Corporate Governance, Sub-Chapter Independent Commissioners, Pages 739-741
2.1.8	To facilitate the effective functioning of the Board of Directors and Board of Commissioners and to enhance investor and stakeholder confidence, the Nomination and Remuneration Committee ensures that there is a formal, rigorous and transparent process for the appointment and promotion of members of the Board of Directors and Board of Commissioners.	The Nomination and Remuneration Committee is responsible for establishing nomination procedures and criteria that are guided by applicable laws and regulations.	√		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration, Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration, Pages 855-868.

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			Comply	Not yet	
2.2	**Remuneration of the Board of Directors and Board of Commissioners**				
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 corporate performance.	BNI's remuneration policy is prepared fairly and reasonably, both in structure and amount, by considering the Bank's values, internal provisions, and remaining competitive and in line with stakeholder expectations and community norms. This policy is applied to the Board of Directors based on performance that supports the achievement of BNI's long-term goals, with indicators such as stock ownership options, deferred bonuses, and a policy of returning part or all of the bonuses/incentives that have been paid (clawback). Remuneration for the Board of Commissioners is fixed, and if there is performance-based remuneration, it must be based on the Bank's long-term development and is different from the policy for the Board of Directors. Independent Commissioners are prohibited from receiving stock options, performance-based shares, or bonuses.	√		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration, Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Pages 855-868.
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 corporate performance. In addition, their positions as President Commissioner and chairman and membership in committees must also be considered.	The Nomination and Remuneration Committee is responsible for ensuring that this policy is implemented fairly and transparently. The Committee provides recommendations to the Board of Commissioners regarding the structure, policies, and amount of remuneration, in accordance with the Committee Charter published on BNI's official website. The Board of Directors only receives facilities that have been approved by the BNI General Meeting of Shareholders (GMS), with a remuneration structure that takes into account the principle of prudence in taking risks to maintain business continuity. At the Annual GMS on March 4, 2025, shareholders determined the remuneration, including salary/honorarium, facilities, allowances for 2025, and bonuses for the Board of Directors and Board of Commissioners for the 2024 Financial Year.	√		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Pages 742-806. Chapter 7. Corporate Governance, Sub-Chapter on the Board of Commissioners, Pages 699-738. Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Pages 951-958.
2.2.3	To ensure that the remuneration package is determined based on the achievements, qualifications and competencies of directors and commissioners by taking into account the corporate operational performance, 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 Board of Commissioners.		√		Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Pages 811-826. Chapter 7. Corporate Governance, Sub-Chapter Nomination and Remuneration Committee, Pages 855-868.

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3.	**Principle 3:** **Employment Relationship between the Board of Directors and the Board of Commissioners**				
3.1	**Nature of the Employment Relationship**				
3.1.1	There is an open discussion between the Board of Directors and the Board of Commissioners as well as 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.	The Board of Directors and the Board of Commissioners work together synergistically in formulating the Bank's vision, mission, and strategy through various forums, such as the Board of Commissioners Meeting with the Board of Directors, joint meetings, and other meetings. The members of the Board of Directors and the members of the Board of Commissioners hold open discussions, but it is still important to maintain the confidentiality of information to prevent leakage of confidential data. The Corporate Secretary, held by Okki Rushartomo, plays a strategic role in strengthening the working relationship between the Board of Directors and the Board of Commissioners, as well as encouraging good governance practices, including maintaining effective communication with Shareholders and other stakeholders.	√		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Pages 742-806. Chapter 7. Corporate Governance, Sub-Chapter on the Board of Commissioners, Pages 699-738.
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 corporate mission, vision and strategy and regularly discusses its implementation.		√		Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Pages 951-958.
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.	In addition, the Corporate Secretary is also responsible for: a. Ensuring a smooth flow of information between the Board of Commissioners, the Board of Directors, and related committees; b. Monitoring the development of governance, ensuring full implementation of the charter of the Board of Commissioners, the Board of Directors, and committees, and providing advice to the Board of Directors and the Board of Commissioners to meet stakeholder expectations; c. Managing meeting needs, including recording meeting minutes and ensuring effective communication between the Board of Directors and the Board of Commissioners, as well as accurately recording meeting discussions and decisions; d. Organizing orientation and professional development for new members of the Board of Directors, Board of Commissioners, and committees; e. Managing investor relations to maintain and improve communication with shareholders and investors, both local and international.	√		

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			Comply	Not yet	
3.2	**Access to Board of Commissioners information**				
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 issues relevant to the corporation. The Board of Commissioners may request the Board of Directors to provide additional information at any time.	The Board of Directors ensures that the Board of Commissioners has access to accurate, relevant and timely information to support the effectiveness of the supervisory function. The Articles of Association and BNI's internal policies guarantee the availability of this information and authorize the Board of Commissioners to request additional information from the Board of Directors whenever necessary. The President Director, with the support of the Corporate Secretary, proactively informs the Board of Commissioners of any major material and important events regarding the condition, performance and management of the Bank. If necessary, a Board of Commissioners meeting can be held immediately to discuss the current condition of the Bank. Between these meetings, the Board of Commissioners also communicates regularly with the Board of Directors to always receive updates on corporate developments that require attention, so that it can carry out its supervisory duties more effectively.	√		Chapter 7. Corporate Governance, Sub-Chapter on the Board of Commissioners, Pages 699-738. Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Pages 742-806. Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Pages 951-958.
3.3	**Responsibility of the Board of Directors and Board of Commissioners for the Impact of Ownership Structure on the Corporation**				
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 shareholding structure and shareholder relationships that may impact the management and operations of the corporation.	The Board of Directors and the Board of Commissioners have a thorough understanding of the Bank's ownership structure and shareholder relationships and their impact on operational control. Both ensure that the shareholder structure and relationships do not interfere with the implementation of their functions, roles, and responsibilities in managing and supervising the Bank. The Board of Commissioners supervises, while the Board of Directors ensures accurate disclosure of information in the event of conditions that may impact the Bank's control.	√		Chapter 7. Corporate Governance, Sub-Chapter Board of Directors, Pages 742-806. Chapter 7. Corporate Governance, Sub-Chapter on the Board of Commissioners, Pages 699-738.
4.	**Principle 4: Ethical and Responsible Behavior**				
4.1	**Guidelines for Ethics and Behavior**				
4.1.1	This statement is outlined 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: a. Act in the best interests of the corporation; b. Act honestly and with high standards of integrity;	BNI has and implemented a Code of Conduct that strictly regulates matters related to value systems, business ethics, work ethics, commitments, and enforcement of company regulations in conducting business and other activities. This guideline also clearly describes the rules of attitudes or interactions that are permitted or not permitted between employees and customers and other stakeholders.	√		Chapter 7. Corporate Governance, Sub-Chapter on the Code of Ethics, Pages 1097-1100.

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	c. Be independent and act based on complete information, in good faith, with due diligence and prudence; d. Comply with laws and regulations applicable to the corporation and its operations; e. Avoid actions that violate laws and regulations or actions that are unethical based on the corporate ethics guidelines; 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; 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; h. Not take advantage of his position or opportunities generated by his position for personal gain; i. Avoiding the act of requesting or receiving from third parties payments, gratuities or other benefits for themselves or for others that cause a conflict of interest/provide benefits to third parties in violation of laws and regulations; j. Respecting differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees; k. Ensuring complete, fair, accurate, timely and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.	The preparation of the BNI Code of Ethics is always based on principles that are in line with BNI's vision, mission, and core values while still paying attention to internal provisions and applicable developments. The BNI Code of Ethics is prepared as a reference for all BNI Hi-Movers in acting and making decisions so that they always work professionally and based on the highest ethical standards. The Code of Ethics is binding and must be adhered to by all BNI employees, both permanent and non-permanent, at all levels of the organization, including the Board of Directors and the Board of Commissioners. The commitment of all BNI Hi-Movers personnel to comply with the Code of Ethics in every activity and implementation of daily tasks and responsibilities is stated in the Integrity Pact which must be signed by every BNI employee. With the written guidelines of the Code of Ethics, it is hoped that every employee has the awareness to implement the highest ethical standards so that later it can increase positive views and strengthen the Bank's reputation in the eyes of stakeholders.			

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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 regarding anti-money laundering, anti-bribery, anti-corruption, anti-fraud or other related standards.	To prevent misuse of the banking system by irresponsible parties as a means to commit money laundering and terrorism financing, BNI always carries out banking operations by prioritizing the principle of prudence, where one of the efforts to implement this principle is by implementing the Anti-Money Laundering, Prevention of Terrorism Financing, and Prevention of Proliferation of Weapons of Mass Destruction (APU PPT and PPPSPM) Program adequately. More than just carrying out obligations, the APU PPT and PPPSPM Programs implemented in BNI's environment also demonstrate BNI's firm stance as a Financial Services Institution (LJK) in building a healthy and sustainable financial industry ecosystem that is free from all forms of money laundering, terrorism financing, and proliferation financing. To prevent the practice of Money Laundering (TPPU) andTerrorism Financing (TPPT) which are categorized as transnational crimes that require extraordinary efforts in handling them, BNI is very careful in measuring APU PPT & PPPSPM risks at the customer level (customer risk rating) and bank-wide (Bank AML risk rating). To ensure that business activities are free from corruption, bribery, and fraud, BNI has formed several organizations, such as the Gratification Control Unit (UPG), Anti-Fraud Unit, and Anti-Fraud Committee. In addition, BNI also implements strict policies and procedures to enforce the principles of anti-corruption, anti-bribery, and anti-fraud, including the signing of an integrity pact by employees, Directors, and Board of Commissioners every year, periodic Gratification and Anti-Bribery Declarations, and ISO 37001:2016 Certification on the Anti-Bribery Management System (SMAP).	√		Chapter 7. Corporate Governance, Sub-Chapter on Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation of Weapons of Mass Destruction Programs (AML, CFT, and PPPSPM), Pages 1083-1086.

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			Comply	Not yet	
4.2	**Corporate Values and Culture**				
4.2.1	The corporation articulates, fosters and expresses corporate culture and values.	BNI establishes the core values "AKHLAK"—Trusted, Competent, Harmonious, Loyal, Adaptive, and Collaborative—as a guideline for all BNI Hi-Movers in carrying out their daily tasks. The implementation of AKHLAK is strengthened through the transformation of work culture and PRINCIPLE 46 which emphasizes integrity and good governance. Some manifestations of this commitment include the signing of the Integrity Pact by all employees, the procurement of pacts in the work process, and the implementation of the prohibition of gratification. Efforts to internalize these values are continuously carried out to ensure compliance with ethical standards and transparency.	√		Chapter 7. Corporate Governance, Sub-Chapter on the Code of Ethics, in the discussion titled Corporate Values and Culture, Page 1100.
4.3	**Communication and Enforcement of Ethical Guidelines, Values and Culture**				
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 corporate strategy and operations including the risk management system and remuneration structure, and enforced.	The Board of Directors consistently internalizes the corporate culture to shape the attitude and character of each BNI Hi-Movers. This internalization process is integrated into the Bank's operational strategy, including the risk management system and remuneration structure built with a prudent risk-taking approach. This step strengthens the values upheld by BNI and supports employee development so that they can face challenges in a dynamic banking environment.	√		Chapter 7. Corporate Governance, Sub-Chapter on the Code of Ethics, Pages 1097-1100.
5.	**Principle 5: Risk Management, Internal Control and Compliance**				
5.1	**Internal Control and Compliance**				
5.1.1	The Board of Directors conducts regular reviews of the appropriateness of the design and operational effectiveness of the corporate governance, risk management, internal control and compliance systems and reports the implementation and results of the reviews to shareholders through the Corporation's annual report.	The Board of Directors implements, reviews, and updates the Bank's governance, including risk management, internal control, and compliance. The results of these activities are reported in the Annual Report as a form of accountability to shareholders and stakeholders. Furthermore, this report will be submitted at the General Meeting of Shareholders (GMS).	√		Chapter 7. Corporate Governance, Sub-Chapter on the Internal Control System, Pages 996-1006.
5.2	**Risk Management**				
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.	Strategic planning and risk management at BNI are the joint responsibility of the Board of Directors and the Board of Commissioners, expressed transparently in accordance with their respective functions and roles. The risk management system is an important agenda in meetings between the Board of Commissioners and the Board of Directors, ensuring effective and responsive strategy integration to market conditions.	√		Chapter 7. Corporate Governance, Sub-Chapter Risk Management System, Pages 1007-1024.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
		Meanwhile, the Risk Monitoring Committee, in accordance with the established Charter, has the task of providing recommendations to the Board of Commissioners. This committee is responsible for monitoring and evaluating the implementation of the duties of the risk management committee under the Board of Directors and related work units.			
5.2.2	The Risk Management Monitoring Committee assists the Board of Commissioners in carrying out its duties by creating a transparent, focused, and independent mechanism for supervising corporate risk management.	The Risk Monitoring Committee, as an integral part of the Board of Commissioners, plays an important role in supervising corporate risk management at BNI. With a transparent, focused, and independent approach, this committee carries out its duties in accordance with the guidelines in the Risk Monitoring Committee Charter. Through solid cooperation between the Board of Directors and the Board of Commissioners, this committee ensures that risk management practices are in line with the Bank's transformation strategy, including in facing current economic dynamics. The committee is also active in providing recommendations and suggestions to strengthen risk governance, so that BNI can continue to grow healthily and sustainably in a competitive market.	√		Chapter 7. Corporate Governance, Sub-Chapter: Risk Oversight Committee, Pages 868-881.
5.3.	**Integration of Governance, Risk Management and Compliance**				
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.	BNI's Board of Directors is committed to strengthening the integration of governance, risk management, and compliance systems as a whole. This effort aims to manage uncertainty and business risks with an integrated approach, ensuring that the Bank remains on the right track in achieving its strategic goals. One important step is to ensure that the compliance function runs independently, without overlapping with other functions that have the potential to create a conflict of interest. In addition, coordination through the implementation of the Governance, Risk and Compliance (GRC) forum continues to be improved, which includes governance, strategy management, performance, and internal audit. This allows BNI to operate with high integrity and ensure decision-making that is in line with best practices in the banking industry.	√		Chapter 7. Corporate Governance, Sub-Chapter: Integrated Risk Management Governance, Pages 1024-1027.
5.3.2	The Board of Directors ensures that the part in charge of the compliance function does not concurrently carry out functions that have the potential to cause a conflict of interest.		√		

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
5.4.	**Internal Audit**				
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.	The Board of Commissioners through the Audit Committee continues to monitor the implementation of BNI's internal audit function to be in line with operational demands and current developments. This monitoring is carried out by ensuring that the audit is carried out objectively, measurably, and oriented towards achieving the Bank's strategic objectives. This step is in line with BNI's efforts to strengthen the integrity and effectiveness of internal control, as well as ensuring that risk management is carried out to the highest standards. Thus, the Board of Commissioners supports the achievement of optimal performance and compliance with applicable regulations in the banking sector	√		Chapter 7. Corporate Governance, Sub-Chapter: Audit Committee, Pages 833-854.
6.	**Principle: 6 Disclosure and Transparency**				
6.1.	**Disclosure Policy**				
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.	BNI has established policies and procedures for the disclosure of material information and protection of corporate confidentiality, in order to guarantee the rights of shareholders to obtain important information routinely and in a timely manner. The Corporate Secretary Division is responsible for managing this disclosure in accordance with the standards set out in the Company Guidelines No. IN/511/REN/001, which came into effect on June 27, 2023.	√		Chapter 7. Corporate Governance, Sub-Chapter: Transparency in Report Submission, Page 1138.
6.1.2	The right of shareholders to receive timely and regular information about the corporation that is relevant to the corporation must be respected.		√		
6.2	**Financial Reporting and Sustainability**				
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, complete, and provide investors with appropriate information to make informed investment decisions.	BNI has an internal policy that regulates the review of financial information to be published, such as financial statements, projections, and other related reports. This review is conducted by the Audit Committee to ensure accuracy and compliance with applicable regulations. The Audit Committee also evaluates the provision of audit services for annual historical financial information by Public Accountants or Public Accounting Firms. The BNI Sustainability Report published on the official website is prepared based on accurate data disclosure and in accordance with domestic and international regulations and best practices. This Annual Report provides an overview of BNI's historical performance in the context of risks, opportunities, and future prospects, thereby helping shareholders and stakeholders understand the Bank's strategic objectives and the progress achieved in creating sustainable value	√		Chapter 7. Corporate Governance, Sub-Chapter Audit Committee, Pages 833-854. Chapter 7. Corporate Governance, Sub-Chapter Transparency in Reporting, Page 1138.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
6.2.2	The Audit Committee ensures the quality of the financial statement audits performed by external auditors. This activity includes recommending the appointment, reappointment and, if necessary, the dismissal and remuneration of external auditors.	The 2025 BNI Sustainability Report is published in a separate book but is integrated with the 2024 BNI Annual Report.	√		
6.2.3	Sustainability reports must be prepared and disclosed accurately and in accordance with a national or international sustainability reporting framework.		√		
6.2.4	The Corporation publish an integrated annual report that places historical performance in context and describes the corporation's risks, opportunities and future prospects, helping shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value.		√		
6.3	**Dissemination of Information**				
6.3.1	Information dissemination channels must provide equal, timely, and relatively inexpensive access to relevant information for users.	BNI utilizes information technology effectively to ensure broad and secure information disclosure. In addition to the official website, BNI uses various other platforms, such as social media (X, Facebook, YouTube, Instagram, TikTok), print media, and electronic media to provide equal, timely, and relevant access to information for shareholders and other stakeholders. Information can also be accessed through the GMS (General Meeting of Shareholders), BNI's official website, and the IDX and KSEI platforms, thus facilitating communication with investors. As part of efforts to maintain transparent communication, BNI regularly holds meetings with financial analysts. These meetings are intended to provide updates on the Bank's performance, prospects, and policy direction. This BNI 2024 Annual Report has detailed the implementation of laws and regulations or generally applicable governance guidelines, namely the Asean Corporate Governance Scorecard (ACGS) and the General Guidelines for Indonesian Corporate Governance (PUGKI) in the Bank's operational activities during 2025.	√		Corporate Governance, Sub-Chapter Transparency in Reporting, Page 1138. Chapter 7. Corporate Governance, Sub-Chapter Application of the Indonesian Corporate Governance Guidelines (PUGKI), Pages 1160-1184.
6.3.2	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	For corporations listed on the capital market in jurisdictions other than the home jurisdiction, the applicable laws and regulations on corporate governance must be clearly disclosed. In the case of cross-listing, the criteria and procedures for cross-listing, the criteria and procedures for recognizing listing requirements for the primary listing must be transparent and documented.		√		

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
7.	**Principle 7: Protection of Shareholder Rights**				
7.1	**Shareholder Rights**				
7.1.1	The corporation has a communication policy that facilitates and encourages shareholder or investor participation.	BNI has a communication policy that encourages shareholder and investor participation with the aim of ensuring that shareholders and investors have access to relevant and accurate information regarding BNI's performance and policies. As the main entity, BNI also ensures that corporate governance policies are implemented comprehensively in the BNI financial conglomerate, creating alignment in governance practices across all business units.	√		Chapter 7: Corporate Governance, Sub-Chapter: General Meeting of Shareholders, Pages 673-698.
7.1.2	The corporation that is the parent entity ensures that its corporate governance policies apply to subsidiaries and entities under common control in which the corporation has significant investments.		√		
7.1.3	The corporation has rules and procedures governing acquisitions, takeovers, and extraordinary transactions such as mergers and sales of substantial corporate assets to ensure that the transactions occur transparently and on fair terms and protect the rights of all shareholders according to their class.		√		
7.2	**Fair Treatment of Shareholders**				
7.2.1	The Corporation has rules and procedures that ensure: a. All shareholders of the same series in one class of shares must be treated equally, 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 shareholdings.	All shareholders, whether minority or majority, domestic or non-domestic, are treated equally by the Bank. Information relevant to shareholders is published through easily accessible media, such as the Bank's website, IDX, and KSEI, in both Indonesian and English.	√		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, in the discussion titled "General Shareholder Rights," page 674, and the discussion titled "Fair Treatment of Shareholders," page 675.
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 managed appropriately, and protect the interests of the corporation and its shareholders.	The Bank ensures that related party transactions are conducted in accordance with applicable laws and regulations, and that conflicts of interest are managed appropriately to protect the interests of the Bank and its shareholders.	√		Chapter 4. Management's Analysis and Discussion of the Bank's Performance, Sub-Chapter Information on Material Transactions Containing Conflicts of Interest and/or Affiliated Transactions with Affiliated Parties/ Related Parties, pages 414-421.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
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 one can directly or indirectly benefit from information that is not/not yet available in the market.	The bank has established a policy to prevent insider trading through its Corporate Guidelines on Prohibited and Non-Prohibited Securities Transactions for Insiders.	√		Chapter 7. Corporate Governance, Sub-Chapter Insider Trading and Conflict of Interest Policy, pages 1112-1113.
7.3	**General Meeting of Shareholders**				
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.	On March 4, 2025, BNI issued a summons for BNI Shareholders to attend the Annual General Meeting of Shareholders for the 2024 Fiscal Year, held on March 26, 2025, from 10:26 a.m. Western Indonesian Time (WIB). On November 21, 2025, BNI issued a summons for BNI Shareholders to attend the 2025 Extraordinary General Meeting of Shareholders, held on December 15, 2025, at 3:30 p.m. Western Indonesian Time (WIB). The summons for the 2025 Annual GMS and Extraordinary GMS listed the agenda and were published on the websites of BNI, the IDX, and the Indonesian Central Securities Depository (KSEI). The summons for the 2025 Annual GMS and Extraordinary GMS were submitted to the Financial Services Authority (OJK) through Letter No. CSE/7/1503 dated March 4, 2025, and CSE/7/9236 dated November 21, 2025. In addition, the Notice for the Annual GMS and Extraordinary GMS has been published on the KSE, IDX, and BNI websites.	√		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, pages 673-698.
7.3.2	The corporation has and discloses rules and procedures that facilitate shareholders in participating and voting effectively at the GMS.	BNI has rules and procedures that facilitate shareholders in participating and voting effectively at the GMS. For its 2025 Annual GMS and Extraordinary GMS, BNI has published Meeting Rules of Conduct, which include information about the facilities for shareholders to participate and vote effectively in both.	√		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, pages 673-698.
7.3.3	Shareholders participate effectively in determining the appointment of members of the Board of Directors and Board of Commissioners.	At the 2025 Annual GMS and Extraordinary GMS, Shareholders were given the opportunity to raise questions and/or provide feedback, as well as to voice their opinions in the discussion of the Agenda Item concerning Changes to the Company's Management Composition.	√		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, pages 673-698.

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
7.3.4	The corporation ensures transparency and accountability of external auditors at the GMS.	At the 2025 Annual GMS, in the Agenda Item on Determination of Public Accounting Firms (KAP) and/or Public Accountants (AP), BNI provided an explanation on the KAP and/or AP proposed for the Meeting.	√		Chapter 7. Corporate Governance, Sub-Chapter General Meeting of Shareholders, pages 673-698.
7.3.5	The complete voting results and summary of the minutes of the GMS were announced to the public on the following business day.	The voting results and summary of the minutes of the 2025 Annual GMS and Extraordinary GMS have been announced in full to the public on the following working day. The Summary of the Minutes of the Meeting has been reported to the regulators, namely the OJK and BEI. The Summary of the Minutes of the Meeting has also been published on the regulator's website and BNI.	√		Bab 7.Tata Kelola Perusahaan, Sub-Bab Rapat Umum Pemegang Saham, Halaman 673-698.
8.	**Principle 8: Other Stakeholders**				
8.1	**Key Stakeholder Engagement**				
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.	The BNI Corporate Secretary is responsible for carrying out regular, transparent and effective communication with key stakeholders, and ensuring stakeholder involvement in BNI's business development. In addition, the Corporate Secretary seeks to understand stakeholder expectations and complaints, by considering the impact of the Bank's strategic decisions on these parties.	√		Chapter 7. Corporate Governance, Sub-Chapter Corporate Secretary, Pages 951-958.
8.2	**Integrating Sustainability into Business Models**				
8.2.1	The Board of Commissioners together with the Board of Directors are responsible, accountable and transparent for sustainability governance, including setting corporate sustainability strategies, priorities and targets. The Board of Directors and the Board of Commissioners include sustainability considerations when carrying out their roles, including among others in the development and implementation of corporate strategies, business plans, main action plans and risk management.	The Board of Commissioners and the Board of Directors of BNI have a joint responsibility to ensure good sustainability governance, with the principles of accountability and transparency. This responsibility includes setting strategies, determining priorities and achieving sustainability targets that are in line with the Bank's vision. In carrying out their duties, the Board of Commissioners and the Board of Directors always consider sustainability aspects in every operational aspect, including the development and implementation of business strategies, long-term planning, implementation of main action plans, and risk management to support the Bank's overall sustainability.	√		BNI 2025 Annual Report, Chapter 7: Corporate Governance. BNI 2025 Sustainability Report
8.3	**Protection of Stakeholders**				

No.	KNKG Recommendation	No. KNKG Recommendation Implementation at BNI	BNI Compliance with KNKG Recommendations		Disclosures in the 2025 Annual Report
			Comply	Not yet	
8.3.1	The Board of Directors ensures and discloses that the corporation's operations reflect the implementation of high ethical standards, social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are implemented to respect and comply with stakeholder rights.	The Board of Directors ensures that all BNI operations reflect the implementation of high ethical standards, social responsibility, and compliance with environmental principles throughout the Bank. The Board of Directors also ensures that appropriate policies and procedures are implemented to respect and comply with stakeholder rights. In addition, the Board of Directors consistently communicates BNI's vision, which focuses on sustainable performance, to employees to ensure understanding and implementation in line with the Bank's sustainability objectives.	√		Chapter 7: Corporate Governance, Sub-Chapter: Corporate Code of Ethics, Pages 1097-1100. Chapter 8: Corporate Social and Environmental Responsibility, Pages 1194-1213.
8.3.2	The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritize sustainability.		√		

Implementation of the ASEAN Corporate Governance Scorecard [ACGS C.2.6]

The implementation of ACGS at BNI is presented in greater detail on BNI's official website at the following link: https://www.bni.co.id/id-id/perseroan/tata-kelola/acgs.

Implementation of Corporate Governance Principles for Banks in Accordance with Basel Committee on Banking Supervision Standard [ACGS: C.26]

BNI has implemented the principles of bank governance in accordance with the Basel Committee on Banking Supervision Standards, which encompass 12 principles. In 2025, the implementation of these principles at BNI is outlined in the following table:

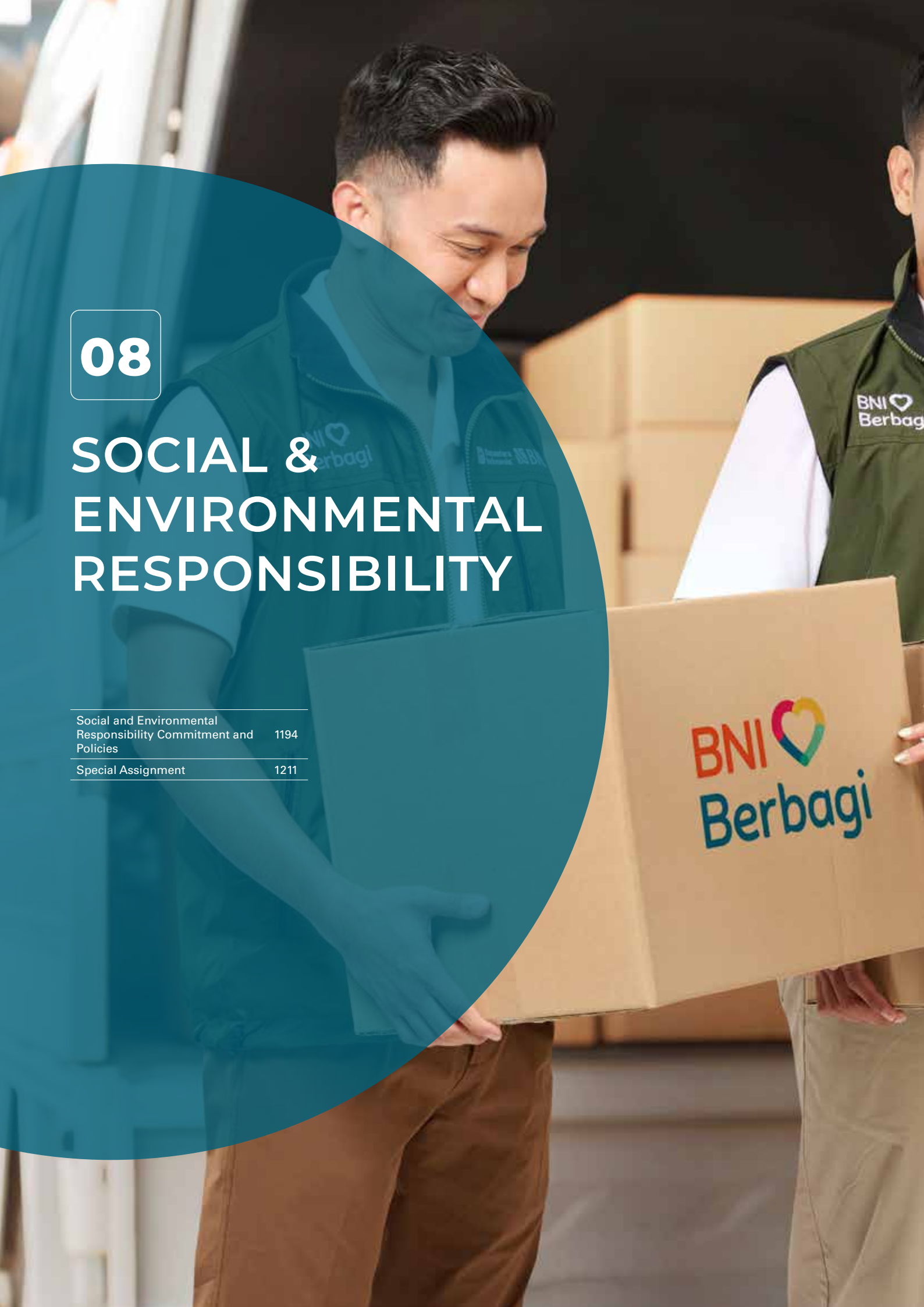
Explanation of Basel Committee on Banking Supervision Standard Principes	Implementation at BNI	Disclosure in Annual Report 2025
Principle 1: **Responsibilities of the Board of Commissioners**		
The Board of Commissioners has responsibilities that include: approval and supervision of the implementation of business strategies, governance structure and mechanisms, and corporate culture.	The Board of Commissioners has duties, responsibilities, and authority as outlined in the BNI Board of Commissioners Charter. This provision was ratified through the Board of Commissioners Decree No. KEP/017/DK/2025 dated September 19, 2025, regarding the Board of Commissioners Charter.	Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, Pages 699-738.
Principle 2: **Qualifications and Composition of the Board of Commissioners**		
Members of the Board of Commissioners must have the qualities appropriate to their duties and responsibilities, both individually and collectively. The Board of Commissioners must understand its role in supervision and the implementation of corporate governance, as well as being able to make decisions in a sound and objective manner.	The Board of Commissioners has duties and responsibilities both individually and collectively. All members of the Board of Commissioners must understand their role in supervision and the implementation of corporate governance, and be able to make decisions in a sound and objective manner. The appointment of members of the Board of Commissioners is carried out in accordance with applicable regulations. Each member has met the criteria and qualities required to perform their respective duties.	Chapter 7. Corporate Governance, Sub-Chapter: Board of Commissioners, Pages 699-738; Sub-Chapter: Nomination and Remuneration, Pages 811-826.
Principle 3: **Structure and Mechanism of the Board of Commissioners**		
The Board of Commissioners must establish the appropriate governance structure and practices in carrying out its duties and periodically review their effectiveness.	In BNI's Governance Structure, the Board of Commissioners is supported by Supporting Organs, which include the Board of Commissioners Secretary, Audit Committee, Nomination and Remuneration Committee, Risk Monitoring Committee, and Integrated Governance Committee. These Supporting Organs report directly to the Board of Commissioners and are appointed to ensure effective oversight. In 2025, the Board of Commissioners periodically assessed the effectiveness of the Supporting Organs to ensure that each committee maximizes its contribution to the implementation of good governance at BNI.	Chapter 7. Corporate Governance: Sub-Chapter: Board of Commissioners, Pages 699-738; Sub-Chapter: Secretary to the Board of Commissioners, Pages 907-910; Sub-Chapter: Audit Committee, Pages 833-854; Sub-Chapter: Remuneration and Nomination Committee, Pages 855-868; Sub-Chapter: Risk Oversight Committee, Pages 868-881; Sub-Chapter: Integrated Governance Committee, Pages 881-904.

Explanation of Basel Committee on Banking Supervision Standard Principes	Implementation at BNI	Disclosure in Annual Report 2025
Principle 4: Board of Directors		
Under the direction and supervision of the Board of Commissioners, the Board of Directors is able to manage the Bank's activities in accordance with the business strategy, risk appetite, remuneration policy, and other policies approved by the Board of Commissioners.	The corporate governance mechanism at BNI has been effectively implemented in compliance with laws and regulations as well as national and global best standards. The Board of Commissioners oversees the management of the company by the Board of Directors, which is tasked with implementing good governance principles. Every policy underpinning BNI's operational activities requires approval from the Board of Commissioners.The effectiveness of this governance positively impacts the achievement of targets and the improvement of the Bank's performance.	Chapter 7. Corporate Governance: Sub-Chapter: Commitment to Implementation of Governance, Pages 651-654; Sub-Chapter: Continuous Improvement of the Quality of GCG Implementation, Pages 660-672; Sub-Chapter: Board of Directors, Pages 742-804.
Principle 5: Business Group Governance Structure		
In a business group, the Board of Commissioners of the parent company has overarching responsibility for the group and must ensure the establishment and implementation of sound governance practices concerning the group's structure, business, and risks. The Board of Commissioners and the Board of Directors must understand the organizational structure of the group and the risks it faces.	As the primary entity in the Financial Conglomerate (PIKK), BNI has 11 (eleven) members of the Financial Conglomerate. To support effective management, BNI has implemented Integrated Governance, Integrated Risk Management, and Integrated Minimum Capital Adequacy Requirements. The Board of Commissioners of BNI has also established an Integrated Governance Committee comprising representatives from all entities within the financial conglomerate. As the main entity, BNI has developed an Integrated Governance Guideline, Integrated Risk Management Policy and Framework, and Integrated Compliance and Internal Audit Guidelines. These policies are implemented by all subsidiaries within the BNI Financial Conglomerate, provided their application does not conflict with more specific regulations applicable to each subsidiary.	Chapter 7. Corporate Governance: Sub-Chapter: Integrated Governance Committee, Pages 881-904; Sub-Chapter: Integrated Internal Audit Unit (SKAIT), Pages 980-984; Sub-Chapter: Integrated Risk Management Governance, Pages 1024-1027; Sub-Chapter: Implementation of Integrated Governance, Pages 1142-1151.
Principle 6: Risk Management Function		
The Bank must have a high-quality, independent risk management function with competent resources and access to the Board of Commissioners.	BNI's risk management strategy is implemented in an integrated manner with its business strategy, using a proactive and forward-looking approach. The goal is to maximize value for shareholders, manage capital comprehensively, and ensure sustainable profitability and business growth. The Enterprise Risk Management (ERM) Division serves as both the Risk Management Work Unit (SKMR) and the Integrated Risk Management Work Unit (SKMRT). In BNI's organizational structure, the ERM Division reports directly to the Director of Risk Management, overseeing the Risk Management and Integrated Risk Management functions. In carrying out its duties, the Risk Management Work Unit has the authority to escalate issues to the Risk Management Committee & AntiFraud Sub Risk Management Committee (KRARMC) or to the Director responsible for the Risk Management function. Meanwhile, the Integrated Risk Management Work Unit escalates issues to the Integrated Risk Management Committee or the Director overseeing the Integrated Risk Management function.	Chapter 7. Corporate Governance: Sub-Chapter: Risk Management System, Pages 1007-1023; Integrated Risk Management Governance Sub-Chapter, Pages 1024-1027.

Explanation of Basel Committee on Banking Supervision Standard Principes	Implementation at BNI	Disclosure in Annual Report 2025
	Meanwhile, supervision of the risk management function is carried out by the Risk Monitoring Committee and the Integrated Governance Committee. The organizational structure of BNI's Risk Management can be found in the 2025 Annual Report in the sub-chapter related to Risk Management.	
Principle 7: **Identification, Monitoring and Control of Risks**		
Risks must be identified, monitored, and controlled across all of the Bank's activities. The quality of risk management infrastructure and internal controls must be able to adapt to changes in the Bank's risk profile, external risk conditions, and industry practices.	BNI implements a comprehensive and continuous risk management process, encompassing risk identification, measurement, monitoring, and control across all material risk factors. This implementation is supported by a reliable Risk Management Information System. The risk identification process at BNI is carried out proactively to analyze the sources, likelihood of risk occurrence, and its impact on the company. Key aspects of this process include: 1. Periodic risk identification; 2. Utilizing methods or systems to identify risks in all products and business activities; 3. Conducting specific risk identification for new products and activities before they are introduced or executed. Risk measurement aims to determine the magnitude of risk exposure as a basis for control and to ensure capital adequacy. Measurement is conducted quantitatively and/or qualitatively in accordance with methods set by the regulator or internal methods if no specific regulations exist. Risk measurement at BNI also includes stress testing for credit, market, and liquidity risks to anticipate extreme conditions. Risk monitoring ensures that risks are being properly managed, including monitoring risk mitigation and established risk limits. Monitoring is conducted by the Operational Work Unit as the risk owner and the Risk Management Work Unit as the Risk Control Unit. Risk control at BNI aims to manage risks that could disrupt the company's business sustainability. The strategies applied include risk mitigation, risk acceptance, risk avoidance, and risk transfer. Additionally, BNI continues to develop its Risk Management Information System to support the processes of risk identification, measurement, monitoring, and control. This system ensures the availability of accurate, complete, timely, and reliable information, thereby supporting Management in decision-making to respond to changes in risk profiles, industry practices, and external risk conditions.	Chapter 7. Corporate Governance: Risk Management System Sub-Chapter, Pages 1007-1023; Integrated Risk Management Governance Sub-Chapter, Pages 1024-1027.

Explanation of Basel Committee on Banking Supervision Standard Principes	Implementation at BNI	Disclosure in Annual Report 2025
Principle 8: Risk Communication		
Effective implementation of risk governance requires accurate risk communication within the Bank's environment, both across organizational units and through reporting to the Board of Commissioners and the Board of Directors	In implementing risk management, BNI emphasizes the importance of aligning business strategies and objectives with risk management strategies and risk appetite. The risk management strategy consists of four main components: 1. Acceptable risk levels (risk appetite) and risk tolerance; 2. Risk management principles and policies; 3. Risk governance; 4. Types of risk exposures and market conditions. The establishment of the risk management strategy is regulated through governance, which includes: 1. Risk management strategy as the foundation for determining business strategy, outlined in BNI's Annual Business Plan (RBB) submitted annually to the Regulator; 2. The risk management strategy is developed by the Risk Management Work Unit, decided by the Board of Directors through the Risk Management & Anti-Fraud Committee Meetings in the field of Risk Management, and approved by the Board of Commissioners. The Board of Directors plays a role in communicating the risk management strategy to all Divisions/Work Units and conducting periodic reviews to adjust to changes in business strategy. This process also considers developments in economic conditions, banking business trends, regulatory changes, and their impact on the Bank's financial performance.	Chapter 7. Corporate Governance: Risk Management System Sub-Chapter, Pages 1007-1023; Integrated Risk Management Governance Sub-Chapter, Pages 1024-1027.
Principle 9: Compliance		
The Board of Commissioners is responsible for overseeing management concerning the Bank's compliance risk. The Board of Commissioners must establish the compliance function and approve policies and processes for identifying, assessing, monitoring, reporting, and advising on compliance risks.	The supervisory function of the Board of Commissioners over the Bank's compliance risk is carried out through the Audit Committee to ensure the strict application of prudential principles. Through this oversight, the Board of Commissioners ensures that all Bank activities and policies align with applicable laws and regulations, including those issued by financial and banking authorities. The Board of Commissioners conducts periodic reviews and assessments of the compliance function to identify potential risks and ensure that compliance risk mitigation measures are adequately implemented. This process also involves monitoring the implementation of recommendations provided by relevant work units and reviewing compliance reports to detect potential violations early. Furthermore, the Board of Commissioners evaluates the effectiveness of the compliance function in supporting compliance targets, which are expected to minimize legal risks and maintain the Bank's reputation.	Chapter 7. Corporate Governance: Board of Commissioners Sub-Chapter, Pages 699-738; Risk Oversight Committee Sub-Chapter, Pages 868-881; Compliance Function Sub-Chapter, Pages 984-994; Risk Management System Sub-Chapter, Pages 1007-1023; Integrated Risk Management Governance Sub-Chapter, Pages 1024-1027.

Explanation of Basel Committee on Banking Supervision Standard Principes	Implementation at BNI	Disclosure in Annual Report 2025
Principle 10: Internal Audit		
The internal audit function must report independent assurance activities to the Board of Commissioners and support both the Board of Commissioners and the Board of Directors in promoting effective governance processes and the Bank's long-term health.	BNI has established an Internal Audit Work Unit operated by the Internal Audit Unit, whose primary responsibilities are to perform assurance and consulting functions. The objective of this function is to provide added value and encourage improvements in the quality of controls, risk management, and corporate governance independently and objectively. Through assurance activities, the Internal Audit Unit evaluates the reliability of internal control processes and compliance with established policies. Additionally, the consulting function provides guidance to work units in formulating effective steps to enhance risk management and strengthen corporate governance. This process is carried out in accordance with the principles of independence and objectivity, as outlined in the Annual Report, which details the roles and contributions of the Internal Audit Unit in supporting BNI's strategic objectives.	Chapter 7. Corporate Governance: Sub-Chapter on Internal Audit Unit, pages 962-980; Sub-Chapter on Integrated Internal Audit Work Unit (SKAIT), pages 981-984; Sub-Chapter on Internal Control System, pages 996-1006.
Principle 11: Compensation		
The Bank's remuneration structure must support the implementation of corporate governance and risk management.	BNI has a Nomination and Remuneration Committee established and functioning in accordance with applicable laws and regulations. This committee is responsible for establishing remuneration policies and mechanisms aligned with the principles of good corporate governance (GCG) and risk management. With the support of the Nomination and Remuneration Committee, BNI ensures that remuneration policies not only support sustainable performance achievement but also strengthen risk management aspects. The committee also ensures that remuneration policies are aligned with the company's longterm objectives, balancing rewards and risks while considering the interests of shareholders, employees, and other stakeholders.	Chapter 7. Corporate Governance: Sub-Chapter on Nomination and Remuneration, pages 811-826; Sub-Chapter on Nomination and Remuneration Committee, pages 855-868.
Principle 12: Disclosure and Transparency		
The governance implementation of the Bank must be carried out transparently to Shareholders, Depositors, other relevant Stakeholders, and Market Participants.	BNI is committed to applying the principles of good corporate governance, particularly transparency. By prioritizing open information disclosure, BNI ensures that all company-related information is conveyed to shareholders and other stakeholders accurately and in a timely manner, in compliance with applicable laws and regulations.	Chapter 7. Corporate Governance: Sub-Chapter on Transparency of the Company's Financial and Non-Financial Condition, page 1107; Sub-Chapter on Transparency of Report Submission, page 1138.



08

SOCIAL & ENVIRONMENTAL RESPONSIBILITY

Social and Environmental Responsibility Commitment and Policies	1194
Special Assignment	1211


BNI
Berbagi
BNI
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Danantara Indonesia
BNI
Berbagi

Commitment and Policy for Implementing Social and Environmental Responsibility Programs [ACGS B.4.4]

COMMITMENT AND POLICY

PT Bank Negara Indonesia (Persero) Tbk (BNI) consistently affirms its commitment to making meaningful contributions to the economy, society, and the environment through the integrated and targeted application of sustainability principles. Each initiative is implemented with long-term impacts in mind and is supported by accountable governance, ensuring that the resulting benefits are accountable and provide sustainable added value for all stakeholders. This commitment is part of BNI's sustainable business strategy to ensure business sustainability while creating long-term value for all stakeholders.

As a State-Owned Enterprise (SOE), BNI participates in driving national economic growth while accelerating the achievement of the Sustainable Development Goals (SDGs), which are both a global agenda and a priority of the Indonesian Government. Aware of this strategic role, BNI consistently implements Social and Environmental Responsibility (TJSL) programs and activities integrated with its business activities, thereby providing a sustainable positive impact on the economy, the banking industry, and society at large.

The implementation of BNI's TJSL program is based on the recognition that success in maintaining sustainable performance is not solely determined by the company's management and operations, but also by social support from the community and environmental sustainability. This principle aligns with the spirit of the SDGs (Standard Development Goals), namely development that sustainably improves economic welfare, maintains social sustainability, preserves environmental quality, and ensures justice and good governance for the sake of improving the quality of life across generations.



The BNI TJSL program is a concrete manifestation of the SOE's commitment and dedication to supporting sustainable development, which aligns with Minister of SOE Regulation No. PER-1/MBU/03/2023 concerning Special Assignments and SOE Social and Environmental Responsibility Programs. In its implementation, the BNI TJSL program is designed with reference to the Bank's Mission and Environmental, Social, and Governance (ESG) aspects, as well as being guided by applicable laws and regulations, namely:

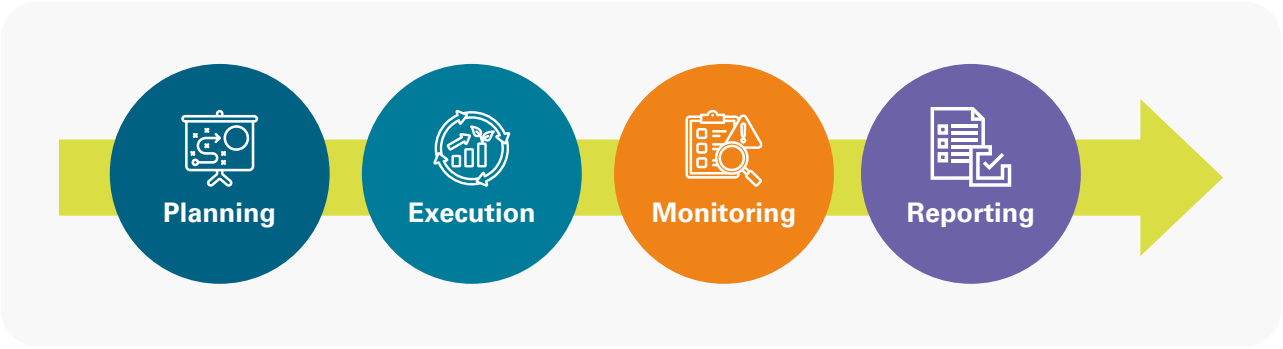
1. Law No. 40 of 2007 concerning Limited Liability Companies as last amended by Law No. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation;
2. Government Regulation No.47of2012 concerning Social and Environmental Responsibility of Limited Liability Companies;
3. Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-1/MBU/03/2023 dated March 3, 2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises
4. Regulation of the Financial Services Authority No. 51/POJK.03/2017 dated July 18, 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies. Issuers, and Public Companies.

BNI has established a policy as the primary foundation for implementing information transparency regarding the impact of business decisions and activities on society and the environment. This policy reflects BNI's commitment to conducting business transparently, ethically, and responsibly, and to ensuring that sustainability principles are integrated into decision-making processes across the organization. BNI's TJSL program implementation policy includes, among other things:

1. Corporate Guideline No. IN/002/CSE/0002 dated February 1, 2024, related to the Social and Environmental Responsibility (TJSL) program;
2. Corporate Guideline for Community Development Management No. IN/341/KMP/001 dated July 17, 2017;
3. Corporate Guideline for Environmentally Friendly Lifestyle No. IN/418/KMP/001 dated September 12, 2017.

Furthermore, BNI has implemented its TJSL program systematically and in an integrated manner to ensure its implementation, success, and impact management in accordance with program priorities and/or objectives. The management and implementation of BNI's TJSL program are carried out in several stages, as follows:

1. Planning;
2. Execution;
3. Monitoring; and
4. Reporting



TJSL PROGRAM OBJECTIVES

The objectives of the TJSL program align with the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-1/MBU/03/2023 dated March 3, 2023, regarding Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises, which are:

1. To provide benefits for economic development, social development, environmental development, as well as legal and governance development for the company;
2. To contribute to creating added value for the company with integrated, targeted, measurable, and accountable impacts;
3. To support micro and small businesses to become more resilient and independent, as well as the surrounding communities.

TJSL PROGRAM PRINCIPLES

The TJSL program is implemented based on the following principles:

1. Integrated, based on risk analysis and business processes that are connected to stakeholders;
2. Targeted, with a clear direction to achieve company goals;
3. Measurable impact, having a contribution that provides benefits and creates change or added value for stakeholders and the company; and
4. Accountability, ensuring responsibility to avoid misuse or deviations.

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MAIN TJSL PILLARS

BNI melaksanakan program TJSL berdasarkan pada 4 (empat) pilar utama, yaitu:

1. Social, to achieve the fulfillment of basic human rights in a fair and equal manner to improve the welfare of all people;
2. Environmental, for the sustainable management of natural resources and the environment as a support for all life;
3. Economic, to achieve quality economic growth through sustainable job and business opportunities, innovation, inclusive industries, adequate infrastructure, affordable clean energy, and supported partnerships; and
4. Law and Governance, to ensure legal certainty and effective, transparent, accountable, and participatory governance to create security stability and establish the rule of law.

These four main pillar sencompass the17Sustainable Development Goals (SDGs), which are: (1) No Poverty; (2) Zero Hunger; (3) Good Health and Well-being; (4) Quality Education; (5) Gender Equality; (6) Clean Water and Sanitation; (7) Affordable and Clean Energy; (8) Decent Work and Economic Growth; (9) Industry, Innovation and Infrastructure; (10) Reduced Inequalities; (11) Sustainable Cities and Communities; (12) Responsible Consumption and Production; (13) Climate Action; (14) Life Below Water; (15) Life on Land; (16) Peace, Justice and Strong Institutions; (17) Partnerships for the Goals.



MAIN FOCUS OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS AND COMPANY SUPPORT TOWARDS SUSTAINABLE DEVELOPMENT GOALS

BNI implements various Social and Environmental Responsibility (TJSL) programs to achieve the Sustainable Development Goals (SDGs). The implementation of these TJSL programs also serves as a concrete manifestation of the Company's commitment and accountability to all stakeholders. Through various TJSL program activities, the Company affirms its commitment to meeting current needs without sacrificing future needs. The implementation of these TJSL programs reflects that the Company's business development is consistently carried out with an emphasis on aligning performance across economic, social, and environmental aspects.

BNI's TJSL program is implemented with selective targeting of beneficiaries including the communities surrounding the Company's operational areas and the wider community. In 2025, BNI will continue to adhere to the directives of the Ministry of State-Owned Enterprises, where TJSL program implementation will be carried out through the provision of assistance and/or other activities, with a primary focus on education, environmental conservation, and the development of Micro and Small Enterprises (MSMEs).

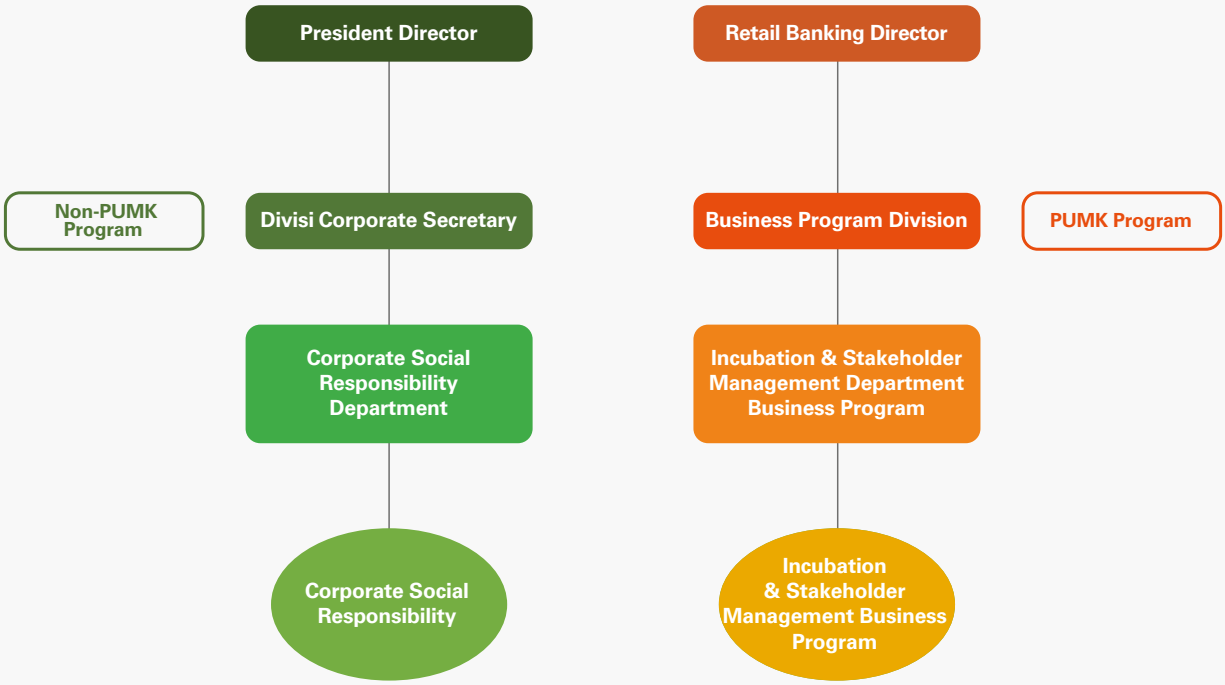
SCOPE OF BNI TJSL

The BNI TJSL Program supports BNI's Sustainability Pillars, especially BNI for Society and BNI for the Environment as well as the Achievement of Sustainable Development Goals (SDG).

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAM MANAGEMENT

The implementation of the BNI TJSL program is divided into several Divisions with responsibilities that are in accordance with the program category. Currently, the management of the BNI TJSL program is in the Corporate Secretary Division (CSE) which is directly responsible to the President Director and the Business Program Division (SBP) which is responsible to the Director of Retail Banking, with the organizational structure attached below.

Organization Structure of TJSL Program Management



STRATEGIES AND PROGRAMS OF ACTIVITIES FOR IMPLEMENTING SOCIAL AND ENVIRONMENTAL RESPONSIBILITY BASED ON THE CONCEPT OF SUSTAINABLE FINANCE

BNI is committed to continuously making a positive impact on improving the social conditions of communities and societies connected to the Company, through the implementation of targeted and sustainable TJSL programs. BNI's TJSL strategies and program implementation are designed with reference to sustainable finance concepts, taking into account stakeholder expectations, complying with applicable legal provisions, and aligning with international norms and practices.

BNI avoids implementing TJSL programs solely for enhancing its public image or business environment reputation. The primary reference for BNI is to understand the objectives and positive impacts of the TJSL programs, ensuring that their implementation is ideal, objective, targeted, and sustainable, in line with the principles of sustainable finance and the achievement of the Sustainable Development Goals.

Furthermore, BNI views the TJSL program as a vital element that goes beyond merely fulfilling POJK 51/2017. It is also aligned with BNI's Three Pillars of Sustainability, fostering harmonious and mutually beneficial relationships with the environment, communities, and stakeholders locally, nationally, and globally, while creating a positive impact on the mindset and quality of life in the surrounding environment.

Information regarding BNI's TJSL implementation program activities is as follows:

1. Micro and Small Business Funding Program (PUMK)
   a. Focus on distributing in clustering by establishing synergistic cooperation with BUMN/BUMD/Pemda that manage fostered partners or MSME actors;
   b. Cooperate with Community Empowerment Institutions (LPM) that foster MSME actors.
2. Social and Environmental Responsibility Program (Non PUMK)
   a. Distribute TJSL Program funds in accordance with the provisions;
   b. Collaborate with professional and competent partners to organize community empowerment programs;
   c. Collaborate with community groups to improve program quality;
   d. Increase the capacity and capabilities of fostered partners through the provision of education, training, internships, marketing, and other forms of assistance;
   e. Implementation of the Social and Environmental Responsibility Program prioritizes the fields of Education, Environment and Development of Micro and Small Enterprises (UMK).

BUDGET AND FINANCING REALIZATION FOR SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS IN 2025

BNI determines the amount of the TJSL program implementation budget by referring to the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. PER-1/MBU/3/2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State- Owned Enterprises.

TJSL PUMK PROGRAM

Based on the Letter of the Minister of SOEs No. S-721/MBU/11/2022 dated November 10, 2022, there are directions regarding the optimization of PUMK funds, namely the appointment of PT Bank Rakyat funds, namely the appointment of PT Bank Rakyat PUMK Program Cooperation. Understanding this, BNI has signed a Cooperation Agreement between BNI and BRI as the manager of the PUMK Program Cooperation, namely PKS No. B.21/MBD/12/2022 and No. SBP/1/018 dated December 13, 2022 with a PKS period of 5 (five) years from 2022 to 2027. In accordance with the direction of the Minister of SOEs, the distribution of PUMK will be focused by BRI as the manager of the PUMK Program Cooperation. When the validity period of the cooperation agreement has ended, BRI will return the balance of the PUMK Program funds owned (cash funds) and deposit the PUMK return funds in stages to BNI.

NON-PUMK TJSL PROGRAM

BNI also implements a TJSL program divided into 4 (four) main pillars, namely Social, Environmental, Economic and Legal and Governance. In 2025, the achievement of budget absorption through the BNI TJSL program reached IDR116,82 billion. The realization of the BNI TJSL Program based on the Main Pillars and Sustainable Development Goals (SDGs) is:

Budget Realization of The TJSL Program Based on the 4 (Four) Main Pillars and Sustainable Development Goals (SDGs) as of December 31, 2025

No	Sustainable Development Goals (SDG)	Realization (IDR Billion)
SOCIAL PILLAR		
1	SDG 1 (No Poverty)	5.27
2	SDG 2 (Zero Hunger)	39.90
3	SDG 3 (Healthy & Well-Being)	12.59
4	SDG 4 (Quality Education)	22.78
5	SDG 5 (Gender Equality)	0.37
	Sub Total	80.90
ECONOMIC PILLAR		
1	SDG 7 (Affordable & Clean Energy)	0.31
2	SDG 8 (Decent Work & Economic Growth)	5.72
3	SDG 9 (Industry, Innovation & Infrastructure)	4.93
4	SDG 10 (Reduced Inequality)	1.02
5	SDG 17 (Partnerships for the Goals)	0.05
	Sub Total	12.02
ENVIRONMENTAL PILLAR		
1	SDG 6 (Clean Water & Sanitation)	1.68
2	SDG 11 (Sustainable Cities & Human Settlements)	16.83
3	SDG 12 (Consumption & Responsible Production)	0.55
4	SDG 13 (Climate Action)	0.52
5	SDG 14 (Life Below Water)	0.60
6	SDG 15 (Life on Land)	3.72
	Sub Total	23.89
GRAND TOTAL		**116.82**

ACTIVITIES, INVESTMENTS OR DONATIONS TO COMMUNITIES OR REGISTERED NON-PROFIT ORGANIZATIONS

As a manifestation of its commitment to implementing TJSL, BNI continues to implement various programs and investments focused on community empowerment and support for registered non-profit organizations. Through sustainable programs across various sectors, BNI strives to create a tangible positive impact on society. Furthermore, BNI also distributes aid and donations to non-profit organizations that contribute to improving social welfare.

PERFORMANCE OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS

BNI consistently applies sustainable finance principles while increasing support for the achievement of the Sustainable Development Goals (SDGs) through the implementation of CSR programs. This effort is part of BNI's contribution to supporting the achievement of the 17 globally established SDGs. As a financial institution, BNI's vision aligns with the principles of sustainable development to create a better future for society, the environment, and the economy.

Information regarding the achievements of BNI's contributions or support to the SDGs that are appropriate and relevant to BNI's activities and business areas is as follows:

Achievements of BNI's TJSL Program Support to The Sustainable Development Goals (SDGs)

No	Sustainable Development Goals (SDG)	(SDG) BNI Achievement
1	SDG 1 (No Poverty)	Natural disaster emergency response assistance, including floods, earthquakes, and volcanic eruptions throughout Indonesia.
2	SDG 2 (Zero Hunger)	Food security assistance for people in need throughout Indonesia.
3	SDG 3 (Healthy & Well-Being)	Health assistance, including ambulances and health infrastructure.
4	SDG 4 (Quality Education)	Educational assistance includes scholarships and educational infrastructure.
5	SDG 5 (Gender Equality)	A community development program that is predominantly female in order to improve the economic level of the community
6	SDG 6 (Clean Water & Sanitation)	Clean water and sanitation assistance, including the provision of clean water boreholes.
7	SDG 7 (Affordable & Clean Energy)	Renewable energy assistance, including street lighting using solar panels.
8	SDG 8 (Decent Work & Economic Growth)	Infrastructure assistance in supporting MSMEs, including MSME equipment infrastructure.
9	SDG 9 (Industry, Innovation & Infrastructure)	Infrastructure assistance, including roads and bridges.
10	SDG 10 (Reduced Inequality)	Assistance in supporting the reduction of inequality, including assistance to persons with disabilities.
11	SDG 11 (Sustainable Cities & Human Settlements)	Assistance for worship infrastructure for all religious communities.
12	SDG 12(Consumption & Responsible Production)	Assistance for responsible consumption, including the use of goods that are no longer used through the textile waste management programme.
13	SDG 13 (Climate Action)	Assistance related to the impact of climate change, including waste management programmes.
14	SDG 14 (Life Below Water)	Assistance related to marine ecosystems, including mangrove seedling planting.
15	SDG 15 (Life on Land)	Assistance related to land ecosystems, including rhino and orangutan conservation.
16	SDG 17 (Partnerships for the Goals)	Collaboration program with competent parties in order to achieve goals

IMPLEMENTATION OF BNI'S TJSL PROGRAM

BNI implements its Social and Environmental Responsibility (TJSL) program, adhering to ISO 26000 principles through the Creating Shared Value (CSV) approach, which emphasizes the creation of shared benefits and value for the company and society. The implementation of TJSL is also aligned with Minister of State-Owned Enterprises Regulation No. PER-1/MBU/03/2023.

Through this approach, BNI's TJSL program, under the umbrella of the BNI Berbagi program, is not only directed at fulfilling the company's social obligations but is also expected to provide optimal benefits for social development and environmental preservation. Furthermore, BNI's TJSL program contributes to creating added value for the Company and encourages the strengthening of micro and small businesses to grow more resilient, competitive, and independent.

Supported by work units across Indonesia, BNI consistently implements community development and environmental conservation programs as part of its contribution to achieving the Sustainable Development Goals (SDGs). This commitment is realized through the BNI Berbagi initiative, designed as a strategic social investment platform to deliver tangible, measurable, and sustainable benefits to the surrounding community and environment.

As of December 31, 2025, BNI has implemented various TJSL programs using a creating shared value approach, the implementation of which encompasses economic, social, and environmental aspects, as detailed below:

SOCIAL PILLAR

1. DISASTER EMERGENCY RESPONSE

Meeting Basic Needs in Disaster-Related Areas

BNI assisted disaster victims throughout Indonesia, including flash floods in Sumatra, the eruption of Mount Lewatobi Laki-Laki in East Flores (NTT), flash floods in Nagekeo and Bali, and the fire in the Yaro Wora tourist village, West Sumba (NTT). This assistance included distributing 22,600 food packages and hygiene kits. This support focused on meeting the basic needs of affected communities through the distribution of food packages, hygiene kits, and other emergency needs to maintain survival and health, and accelerate post-disaster stabilization.

Fulfilling Basic Needs in the Sumatra Disaster

BNI provided emergency relief assistance to victims of flash floods and landslides that struck various regions in Aceh, West Sumatra, and North Sumatra. The assistance provided included food and daily necessities such as rice, instant noodles, eggs, ready-to-eat rice, as well as baby and elderly supplies such as diapers, baby formula, and baby porridge. Distribution was prioritized in the worst-affected areas that had declared a disaster emergency. Specifically for Aceh, BNI, in collaboration with the State-Owned Enterprises (SOEs) Family through the BUMN Peduli (One Heart for Sumatra) program, coordinated by Danantara, distributed emergency relief assistance to disaster-affected residents in Aceh. This aid distribution is part of BNI's rapid response and concrete actions in supporting the emergency response phase and early recovery of affected communities, with a focus on meeting basic needs and supporting vulnerable groups, particularly children.

Emergency Infrastructure Response

BNI's aid distribution in Aceh included 30 tents, consisting of five 3x4 tents, five 3x6 tents, and 20 6x14 platoon tents. In the education sector, BNI distributed 400 elementary school uniforms, 700 junior high school uniforms, and 100 high school uniforms. To support children's trauma healing activities, BNI also distributed 200 dolls, 200 children's storybooks, 100 play sets, and a 24-square-meter puzzle mat. In addition, BNI distributed other supporting aid, including 1,000 blankets, hygiene supplies such as soap, brushes, cleaning fluid, and brooms, four water tanks, 10 rechargeable flashlights, and 10 boxes of masks.

Trauma Healing for Children in Disaster Areas

BNI is assisting with the psychosocial recovery of children affected by flash floods in Leuser Village, Southeast Aceh Regency. This effort underscores BNI's commitment to post-disaster recovery, which focuses not only on physical and logistical assistance but also on the mental recovery and psychological well-being of vulnerable groups, particularly children. The trauma healing services provided are part of the company's Social and Environmental Responsibility (TJSL) policy, which focuses on sustainable recovery. Together with the State-Owned Enterprises (SOEs) Family, through the BUMN Peduli (One Heart for Sumatra) program, coordinated by Danantara, BNI provides psychosocial support for child disaster victims. This trauma healing activity is one of the quick impact programs from the BNI Berbagi (Sharing) program implemented at the BUMN Volunteer Post in Leuser Village. By involving experienced facilitators who assist children in disaster areas, this activity is designed to provide a safe space for children to return to play, interact, and express their feelings positively.

2. POST-DISASTERS

Basic Facility Recovery Home Renovation for Affected Residents

BNI is providing housing recovery support by repairing the homes of residents affected by the eruption of Mount Lewatobi Laki-Laki in East Flores (NTT). This program aims to restore decent, safe, and healthy housing, while also supporting the recovery of the community's quality of life during the post-disaster rehabilitation phase.

Danantara Housing (HUNTARA) in Aceh

BNI expressed its support for the government's target, through the Daya Anagata Nusantara Investment Management Agency (BPI) Danantara Indonesia, to provide 15,000 Danantara Housing (Huntara) units for disaster-affected communities in Aceh, West Sumatra, and North Sumatra. This effort aligns with the government's commitment to providing decent and dignified housing for

disaster victims as a tangible manifestation of the state's presence. One form of this support is demonstrated through BNI's participation in the construction of temporary shelters in Aceh Tamiang Regency. In the first phase, of the 600 temporary shelters built in the area, BNI contributed approximately 20 percent, or 120 units. In addition to the residential units, the Danantara Housing area also features various supporting facilities, including a playground, Wi-Fi, a prayer room, public facilities, and restrooms and sanitation.

Food Security Program

BNI is committed to contributing to strengthening food security and alleviating hunger in the community as part of social protection efforts and improving public welfare. This commitment is demonstrated, among other things, through the implementation of food security programs integrated into a series of religious holiday celebrations, including Ramadan and Eid al-Fitr, as well as Christmas and New Year. This program aims to meet basic needs, alleviate the economic burden on vulnerable communities, and strengthen social solidarity and a sense of togetherness within the community.

In 2025, BNI distributed 291,850 food packages containing 1,459 tons of rice as part of efforts to strengthen food security and social protection for vulnerable communities throughout Indonesia. The food security program, integrated with religious holiday celebrations throughout 2025, included the distribution of 113,050 food packages, consisting of 79,050 packages during the Ramadan 1446 H program and 34,000 packages during other religious holiday celebrations.

In its implementation, BNI applies the principle of prudence by ensuring that aid distribution does not overlap with government-provided basic food aid. Distribution of food packages is carried out through coordination with relevant agencies and institutions, as well as local governments, particularly in the process of identifying underprivileged and eligible recipients. This approach aims to maintain accountability, increase distribution effectiveness, and ensure that BNI's food security program is aligned with and complements national social protection policies.

3. HEALTH

Stunting Reduction Program

BNI is committed to supporting efforts to accelerate stunting reduction in Indonesia through the implementation of two complementary strategic programs oriented towards sustainable impact.

First, through the KAWAN BNI Program in Nagekeo Regency, NTT, BNI is directly addressing vulnerable groups by providing nutritional interventions to 50 children experiencing stunting, wasting, and underweight, as well as 25 mothers with Chronic Energy Deficiency (CED). The interventions include Supplementary Feeding (PMT) for 90 consecutive days, accompanied by capacity building for families and local cadres through parenting education, balanced nutrition, and basic health practices. This approach is designed not only to meet short-term nutritional needs but also to build sustainable behavioral change and family health resilience.

Second, through BNI Berbagi in Tangerang Regency, Banten, BNI supports improvements in basic health determinants by providing nutritious food to 200 beneficiaries for six months, along with repairs to uninhabitable houses and the construction of toilet facilities. This intervention is designed to improve quality of life and environmental sanitation, as crucial factors in long-term stunting prevention.

Third, through BNI Berbagi in Tasikmalaya Regency, West Java, BNI is implementing an integrated intervention to prevent and manage stunting. This program includes distributing nutritious supplementary food to 47 stunted children for two months, providing basic food assistance to parents of stunted children, and holding nutrition seminars for pregnant women as an early prevention effort. In addition, BNI is strengthening parenting and mental health through smart parenting and mental health training, increasing the capacity of basic health services through training midwives and Sigap Stunting cadres, and distributing educational game equipment (APE) to eight integrated health service posts (Posyandu) to support child growth and development and the sustainability of Posyandu services.

Cataract Surgery Program

Cataracts are the leading cause of blindness worldwide, yet they are preventable. The estimated incidence of cataracts is 0.1% per year, meaning one in every 1,000 people develops cataracts annually. Given the data on the prevalence of cataracts, Given the data on the prevalence of cataracts, including the Government, to work together to prevent blindness caused by this condition.

BNI recognizes that cataracts are an eye disorder that can impact people's lives. Although surgically treatable, not everyone has access to adequate healthcare. While surgery can remedy the condition, not everyone has access to quality healthcare facilities.Therefore, a free cataract surgery program is being held in areas with high cataract populations, limited ophthalmologists, limited surgical equipment, and areas with limited economic resources. This program demonstrates BNI's commitment to supporting government programs to reduce blindness due to cataracts and the World Health Organization's (WHO) Right to Sight initiative.

In 2025, BNI, in collaboration with the Pundi Amal Peduli Kasih Foundation (YPP) and the Indonesian Ophthalmologist Association (Perdami), held a cataract surgery community service at Komodo Regional Hospital in Labuan Bajo, West Nusa Tenggara (NTB), to help the community prevent vision impairment and enable them to resume normal activities. This program helped 100 cataract patients, enabling beneficiaries to return to normal and productive activities, while simultaneously improving their quality of life and increasing their independence.

Mass Circumcision Program

BNI is implementing the Mass Circumcision Program as part of the Company's commitment to improving access to basic healthcare services for the community, particularly children from underprivileged families. This program aims to help alleviate the economic burden on families while supporting the healthy growth and development of children through safe and standardized preventive healthcare services.

In 2025, BNI facilitated mass circumcisions for 910 children across Indonesia. The program is implemented in collaboration with healthcare facilities and professional medical personnel, prioritizing the principles of safety, hygiene, and participant comfort.

Retiree Health Check-Up Program

BNI provides Medical Check-Ups (MCU) for retirees as an effort to detect diseases early and maintain health in the elderly. This program aims to raise awareness of the importance of regular health check-ups and support a healthier and more productive quality of life in retirement.

In 2025, BNI provided MCU services to 4,386 retirees. Through this program, BNI contributes to promotional and preventive health efforts, while also helping to reduce the risk of non-communicable diseases through early detection and treatment.

Health Infrastructure

In 2025, BNI distributed 50 ambulances across Indonesia. This assistance was distributed in collaboration with licensed and competent agencies in the social and health sectors, ensuring that the ambulances are managed and utilized effectively and professionally.

BNI-supported ambulances are used to provide free emergency healthcare services, particularly to the underprivileged. This improves access to healthcare, expedites medical treatment, and supports lifesaving efforts in areas with limited healthcare facilities.

4. EDUCATION

Children's Character Education Program and Teacher Certification

As part of BNI's commitment to supporting the improvement of education quality and strengthening human resources, in 2025 BNI implemented the Children's Character Education and Teacher Certification Program in West Nusa Tenggara Province. This program reached 10 schools in Lombok, involving 3,400 students, 150 teachers, and 390 parents through strengthening character education that emphasized synergy between schools and families. In addition, BNI supported TOEIC international certification for 100 English teachers throughout NTB to increase the capacity of educators to provide competitive teaching aligned with international standards. This initiative is expected to contribute to producing a generation that excels academically and possesses strong character in the future.

Scholarships

As part of BNI's commitment to supporting increased access to and sustainability of education, throughout 2025 BNI distributed scholarships to 786 recipients. This program aims to encourage the sustainability of education and the development of the potential of the younger generation, as a long-term social investment in building superior and competitive human resources.

Educational Facilities and Infrastructure

By 2025, BNI will contribute to improving the quality of education by distributing assistance to 127 schools and educational institutions across its operational areas. This includes the construction and renovation of school buildings, classrooms, and laboratories, as well as the provision of learning support facilities and infrastructure, educational aids, and reading gardens. This support is spread across several regions in Indonesia, including West Java, Central Java, East Java, Bali, Riau, North Sumatra, and Maluku, with the goal of improving the comfort and quality of the teaching and learning process for students and educators. Through this initiative, BNI strives to support the creation of a superior generation that is competitive and contributes to future development.

Employee Volunteering Program

In implementing its CSR activities, BNI encourages its employees to volunteer their time and ideas. This program aims to foster togetherness among employees in helping the community, increase employee loyalty to the company, and create a better work environment.

First, the State-Owned Enterprises (BUMN) Volunteer Service (RBB) Batch VII

BNI actively participated in the State-Owned Enterprises (BUMN) Volunteer Service (RBB) Batch VII, organized by the Ministry of State-Owned Enterprises in Pamekasan Regency, East Java, on February 17–19, 2025, as part of a simultaneous program across 10 locations involving 150 SOE employees. As host, BNI deployed five volunteers who collaborated with 10 volunteers from across SOEs to carry out various cross-sector social activities, including financial education and student motivation at SDN 1 Jungcangcang, distribution of nutritious food, improvement of school facilities, environmental preservation through mangrove planting and improvement of regional infrastructure, financial literacy and digital marketing training for 30 MSMEs, support for salt farming, and preservation of local Madurese culture through introduction and mentoring of keris production and exploring village potential for cultural tourism development.

Second, Volunteer Involvement in Sumatra Disaster Response

BNI deployed volunteers to directly participate in disaster response and early recovery efforts for affected communities in Aceh. The involvement of BNI volunteers is part of a joint action by the State-Owned Enterprises (SOEs) family through the BUMN Peduli (One Heart for Sumatra) program, coordinated by Danantara Indonesia. BNI volunteers were dispatched along with hundreds of volunteers from 11 SOEs and focused on strengthening humanitarian activities in the affected areas, particularly North Aceh and Southeast Aceh, which served as the main disaster response posts. As a form of operational support, BNI also distributed logistical assistance via three trucks carrying cleaning supplies, sanitation materials, and supporting equipment such as water tanks, water pumps, generators, and volunteer safety equipment. This assistance was prepared to support the immediate needs of the community and volunteer activities in the field. The BNI volunteers deployed came from various work units at the Regional Office 01, demonstrating the spirit of mutual cooperation and solidarity among BNI employees.

Third, BNI Hi Movers' Involvement in Social and Environmental Programs

Through the BNI Hi Movers community, BNI employees are actively involved in supporting the implementation of CSR programs, particularly in food security programs and religious holiday celebrations. This includes cleaning and revitalizing places of worship. Furthermore, BNI Hi Movers volunteers participate in critical land reforestation programs and other environmental activities, demonstrating a tangible contribution to environmental sustainability and strengthening sustainability awareness within the company.

By 2025, the level of employee involvement through the BNI Hi Movers community in the Employee Volunteering Program will reach 96% of BNI's total employees, reflecting high levels of participation, social awareness, and the internalization of sustainability values as part of the company's culture.

5. GENDER EQUALITY

BNI initiated the "Mengayam Kebaikan untuk Indonesia" (Weaving Goodness for Indonesia) Program on Solor Island, East Flores, NTT. This program aims to improve the lives of 400 women and conserve culture through weaving on Solor Island. This mentoring program focuses on the Du Anyam assisted area on Solor Island, East Flores Regency, NTT Province. Participants are spread across three sub-districts on Solor Island, East Flores Regency. To achieve this goal, several activities will be carried out, namely:

1. Construction of weaving houses as supporting infrastructure for productive community activities;
2. Establishment of cooperatives and institutional strengthening to encourage the sustainability of community businesses;
3. Construction of a pipeline for clean water access for mothers and children;
4. Provision of supplementary feeding (PMT) and nutrition education for 100 children and toddlers;
5. Training to improve the quality and production capacity of 400 weavers;
6. Implementation of joint weaving activities with weavers;
7. Basic financial management training, business finance, and introduction to financial services.

ECONOMIC PILLARS

1. SUPPORT FOR CLEAN ENERGY

BNI supports the development of New and Renewable Energy (NRE) as part of its commitment to driving the transition to a green economy and strengthening national energy security. Through the use of solar energy, BNI provides 34 solar-powered street lighting locations in Sleman and Gunung Kidul (DIY Yogyakarta), as well as Tulungagung and Blitar (East Java).

This initiative contributes to providing reliable and efficient energy access for the community, while supporting social and economic activities in the target areas. Furthermore, the use of solar energy contributes to reducing greenhouse gas emissions and reducing dependence on fossil fuels, thereby encouraging the development of an inclusive and sustainable green economy.

2. SUPPORT FOR COMMUNITY ECONOMIC GROWTH

Rumah BUMN

The Rumah BUMN serves as a platform for the collaboration of State-Owned Enterprises (BUMNs) in shaping the digital economy ecosystem by nurturing micro, small, and medium enterprises (MSMEs) to enhance their capacity and capabilities. MSMEs supported by Rumah BUMN receive empowerment tailored to their respective levels of entrepreneurship. The presence of Rumah BUMN entrepreneurship. The presence of Rumah BUMN level, guiding them towards Go Modern (a shift in entrepreneurial mindset), Go Digital (utilizing social media), Go Online (embracing e-commerce), and Go Global (preparing for exports). Currently, BNI operates 23 Rumah BUMN locations, which serve as hubs for business development for over 6.908 MSME practitioners, providing more than 507 training sessions and facilitating the acquisition of 5.512 legal permits (including PIRT, NIB, Halal Certification, and BPOM).

KAWAN BNI Program

The KAWAN BNI Program is a village community empowerment initiative designed as a sustainable mentoring platform to strengthen local economic capacity. Through a collaborative approach, KAWAN BNI develops the potential of villages by integrating business mentoring, community capacity building, and expanding access to markets and financial services. The KAWAN BNI Program focuses on community mentoring in tourist destinations—such as cultural and ecotourism villages—and empowering vulnerable groups, particularly women and local communities. This program is aimed at promoting village economic independence, creating inclusive growth, and building sustainable social and economic resilience.

KAWAN BNI Activities	
Location: Wringin Putih Village, Muncar District, Banyuwangi Regency, East Java **Potential development**: mangrove ecotourism, mangrove nurseries, soft-shell crab cultivation **Number of beneficiaries**: 5,037 stakeholders	**Location**: Ponggok Tourism Village, Polanharjo District, Klaten Regency, Central Java **Potential development**: Spring-based water tourism (umbul), tourism village **Number of beneficiaries**: 877 stakeholders
Location: Laweyan Batik Village (Surakarta City, Central Java) and Giriloyo Batik Village (Imogiri District, Yogyakarta Special Region) **Potential Development**: Community Economy Through Environmentally Friendly Batik Assistance **Number of Beneficiaries**: 100 stakeholders	**Location**: Lembung Village, Galis District, Pamekasan Regency, Madura, East Java **Potential development**: Mangrove Ecotourism **Number of beneficiaries**: 40 stakeholders
Location: Solor Island, East Flores Regency, East Nusa Tenggara Province. **Potential development**: creative economy (palm weaving and derivative products), culture (preservation and strengthening of traditional ikat weaving). **Number of beneficiaries**: 420 stakeholders	**Location**: Yaro Wora Traditional Village, Patiala Bawa Village, Lamboya District, West Sumba Regency, East Nusa Tenggara Province. **Potential development**: Cultural-based tourism village **Number of beneficiaries**: 200 stakeholders
Location: Jawapogo Village, Mauponggo Subdistrict, Nagekeo Regency, NTT **Problems addressed**: High prevalence of stunting and child malnutrition, vulnerable maternal nutritional status, low family nutritional knowledge and practices, and limited capacity of Posyandu cadres **Number of beneficiaries**: 90 stakeholders	**Location**: Lembah Asri Serang Tourism Village, Purbalingga, Central Java **Potential development**: Tourism village with significant potential in the agrotourism and horticulture sectors **Number of beneficiaries**: 55 stakeholders

3. SUPPORT FOR PUBLIC INFRASTRUCTURE

BNI supports the construction and improvement of public infrastructure, particularly roads, as part of the company's commitment to improving the quality of life and promoting equitable development. By 2025, BNI had provided support for road construction and repairs in 26 locations across Indonesia, including the provinces of West Java, Central Java, East Java, and Yogyakarta. Adequate road infrastructure serves as a key link for social and economic activities, facilitating access to basic services, reducing transportation costs, and increasing productivity and distribution of business results. Through this initiative, BNI contributes to strengthening the local economy, reducing disparities between regions, and supporting sustainable community welfare.

4. SUPPORT FOR REDUCING INEQUALITY

Through the BNI Berbagi program, BNI affirms its commitment to supporting the reduction of social inequality through the empowerment of people with disabilities, with a focus on strengthening business capacity, increasing productivity, and economic independence. This effort is part of BNI's ongoing commitment to ensuring that vulnerable groups have equal access to decent and sustainable livelihood opportunities.

In 2025, BNI provided various forms of empowerment support to people with disabilities. One such intervention was the provision of briquette production machinery to the Independent Disabled Community (Komunitas Difabel Mandiri) located in Banjardowo Market, Genuk District, Semarang City. This production facility support is aimed at increasing production capacity and efficiency, while strengthening the sustainability of the community's businesses, which are the primary source of livelihood for its members. Previously, limited equipment hampered production scale and income. With BNI's support, the community is encouraged to increase productivity, expand business opportunities, and sustainably improve the economic well-being of its members and their families.

In addition, BNI also supports the empowerment of women, including women with disabilities, through the BNI Bekasi BUMN House. Since its establishment in 2017, the BNI Bekasi BUMN House has become a development platform for more than 400 MSMEs, through training, business mentoring, and production facility support. One beneficiary is Paini, a disabled woman who runs the culinary business Bumbu Pecel Yuk Ni, who significantly increased her production capacity after receiving production equipment support from BNI.

BNI also collaborates with the Indonesian Ministry of Social Affairs to provide support to 10 MSMEs with disabilities, in the form of business equipment assistance, business development assistance, social media management assistance, and the provision of disability-assisted devices. This program aims to encourage increased business capacity, expand market access, create a more inclusive MSME ecosystem, and strengthen the economic independence of people with disabilities.

ENVIRONMENTAL PILLAR

1. Support For Clean Water And Sanitation

Clean water and sanitation are basic human needs that are crucial for health, quality of life, and community resilience. The impacts of climate change are increasingly eroding the availability of clean water in a number of areas, making access to clean water and adequate sanitation facilities an urgent need for the community.

As a commitment to meeting basic needs and improving the community's quality of life, BNI supports the provision of clean water and sanitation facilities in 78 locations throughout Indonesia. This support aims to increase community access to safe clean water, improve sanitation conditions, and encourage sustainable clean and healthy living behaviors.

2. Support For Cities And Settlements

Places of Worship

BNI supports the strengthening of inclusive cities and settlements by providing and improving places of worship, demonstrating the company's commitment to supporting spiritual life and strengthening the values of togetherness in society. Adequate places of worship not only serve as places for religious activities but also serve as centers for moral development, social interaction, and strengthening tolerance and harmony between religious communities.

By 2025, BNI had distributed assistance to 142 places of worship representing various religions across its operational areas. This support contributes to creating a harmonious, safe, and sustainable community life, while strengthening social cohesion at the community level.

3. Support For The Ecosystem

Waste Management Program

Waste management, particularly household waste and waste in tourist areas, remains an environmental challenge that requires serious attention due to its impact on public health, environmental quality, and the sustainability of tourist destinations.

As a commitment to sustainable environmental management, BNI supports the waste management program by providing 16 garbage trucks in various areas to improve the effectiveness of waste collection and transportation at the community level. In addition, BNI also implements a waste management program in three schools in Bali Province by providing waste shredders, composters, and segregated waste bins, as well as implementing waste recycling education programs complemented by financial literacy.

This support aims to strengthen community-based waste management and education systems, encourage changes in waste management behavior from an early age, and create a clean, healthy, and sustainable environment.

Critical Land Reforestation Program

As part of the implementation of the Environmental Pillar through the BNI GoGreen program, specifically focusing on the Green and Blue Ecosystem, BNI is implementing a Critical Land Reforestation Program as an effort to maintain environmental carrying capacity and strengthen ecosystem resilience in a sustainable manner.

Critical Land Rehabilitation Program in Pangpang Bay, Banyuwangi

To support the preservation of mangrove forests and all their benefits, BNI planted approximately 165,000 mangrove seedlings on a 50-hectare (ha) area in Pangpang Bay, Wringin Putih Village, Banyuwangi. These mangrove seedlings not only improve the marine ecosystem but also provide economic benefits to the village community, most of whom depend on marine resources for their livelihoods. In addition to planting, BNI has been actively caring for the mangrove trees, working with local residents for three years.

Critical Land Rehabilitation Program in Indramayu

BNI also planted 79,000 sea pine seedlings on Tiris Beach, Indramayu, in commemoration of BNI's 79th anniversary. This initiative was designed to support coastal ecosystem conservation by increasing vegetation cover, which plays a role in carbon sequestration, protecting coastal areas from abrasion, and strengthening environmental resilience. This activity involved local communities, students, and BNI employees as a form of collaborative participation in environmental conservation and creating a sustainable positive impact on coastal ecosystems.

Pamekasan Critical Land Reforestation Program

As part of the BNI GoGreen program's Blue Ecosystem focus, BNI restored critical land in Lembung Village, specifically the Lembung Ecotourism area, through mangrove planting on a 10-hectare area and year-long plant maintenance. This activity was carried out in collaboration with the BUMN Bakti Volunteer Program and the Lembung Ecotourism management. It also included community education on the importance of mangrove ecosystems and improvements to supporting facilities, such as a wooden walkway leading to the mangrove forest area. This initiative supports coastal conservation, increasing environmental awareness, and strengthening the potential for sustainable community-based ecotourism.

Tree Planting Program

Throughout 2025, BNI will implement a tree planting program to plant 179,650 trees across Indonesia as part of the company's commitment to supporting environmental conservation and climate change mitigation.

This program aims to increase green cover, improve environmental quality, and strengthen ecosystem function, particularly in areas prone to degradation and impacted by climate change.

Endangered Animal Conservation Program

Although BNI's banking operations do not directly impact environmental sustainability and biodiversity, it remains committed to supporting endangered fauna conservation efforts in Indonesia. Biodiversity conservation plays a vital role in maintaining ecosystem balance and contributing to emissions reduction.

Orangutans, along with many other tropical forest species on the island of Borneo, are now facing extinction. The challenges they face are complex, and the causes of deforestation are numerous. The survival of the Bornean orangutan faces numerous challenges. Its dwindling population threatens the balance of the forest ecosystem. Recognizing this, BNI continues to support orangutan conservation efforts in Indonesia. In collaboration with the Ministry of Environment and Forestry (KLHK), BNI and the Borneo Orangutan Survival Foundation (BOSF) are working together to preserve the Bornean orangutan (Pongo pygmaeus) at the Samboja Lestari Orangutan Rehabilitation Center in Kutai Kartanegara Regency, East Kalimantan. The five-year critical land rehabilitation and maintenance program is expected to support BNI's Net Zero Emission plan.

AWARDS FOR SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAM IN 2025

During 2025, BNI successfully won several awards for the implementation of the TJSL program as follows:

Name of Award	Date	Organized by
Impact Excellence	October 2025	Investortrust CSR Awards (by Investortrust.id)
Green Warrior Award-ESG Now Awards 2025	October 2025	ESG Now Awards 2025
Platinum Alignment - Top 100 Indonesia 2025	November 2025	2025 La Tofi ESG Rating & Sustainibility Communication Awards 2025 (by La Tofi)
Best Economic in Local Community	November 2025	Indonesia Corporate Sustainability Award 2025 (by Olahkarsa & ACEXI)
Leadership AA – Excellence Leader in ESG Transparency	November 2025	Indonesia ESG Leadership Awards 2025 (by Bumi Global Karbon)
Best Social Impact	December 2025	Investing on Climate Editors Choice Awards 2025 (by Investing on Climate)
Best Innovative Conservation	December 2025	Investing on Climate Editors Choice Awards 2025 (by Investing on Climate)

IMPLEMENTATION OF IMPACT MEASUREMENT OF SOCIAL AND ENVIRONMENTAL RESPONSIBILITY PROGRAMS IN 2025

To measure the social impact and evaluate the effectiveness of the BNI Berbagi Program, the Company calculated the Social Return on Investment (SROI) and Community Satisfaction Index (CSI) for its TJSL programs. In 2025, BNI conducted impact measurements on several programs/projects, namely:

Program Name	SROI*) value	SME	
		Value of SMEs	Satisfaction Category
Village Tour Program to Lembah Asri Serang, Purbalingga , Central Java	2.43	87.20%	Good
Village Tour Program To Ponggok , Klaten , Central Java	2.52	82.25%	Good
Ngawi State-Owned Enterprises Housing Program	5.35	92.56%	Very Good

*) For example, an SROI value of 2.43 means that every IDR1 investment spent by BNI generates a social benefit value of IDR2.43 for stakeholders.

Micro and Small Business Funding and Guidance Program

Micro and Small Business Funding Program

The PUMK program is an initiative within BNI's TJSL activities, designed to improve the quality of life in local communities by fostering the growth of micro and small businesses in partnership with the community. This program is implemented in accordance with the Regulation of the Minister of SOEs No. PER-05/MBU/04/2021, dated April 20, 2021, regarding the Social and Environmental Responsibility Program of State-Owned Enterprises, as well as its subsequent amendment, the Regulation of the Minister of SOEs No. PER-6/MBU/09/2022, dated September 15, 2022. Since its inception in 2017, the BNI PUMK program has been overseen by the Business Program Division.

The implementation of the PUMK program seeks to provide micro and small businesses with easy access to capital, while also offering guidance to strengthen their resilience and promote long-term independence. BNI distributes the PUMK Program through soft loans to current fostered partners, with an administration fee of 3% per effective year of the loan limit.The loans are distributed in the following forms:

1. Loans to finance working capital and/or purchase of fixed assets in order to increase production and sales;
2. Special loans to finance the funding needs for implementing fostered partner business activities which are additional and short-term loans in order to fulfill orders from fostered partner business partners;

3. Development Expenses:
   a. To finance education, training, internships, marketing, promotions, and other matters relating to increasing the productivity of fostered partners as well as for studies/ research related to the Small and Micro Business Funding Program (PUMK);
   b. Development expenses are in the form of grants and the maximum amount is 20% of the Partnership Program funds distributed in the current year;
   c. Development Expenses can only be given to or for the benefit of fostered partners

Based on the Letter of the Minister of State-Owned Enterprises No. S-721/MBU/11/2022 dated November 10, 2022, there are directions related to the optimization of PUMK funds, namely the appointment of PT Bank Rakyat Indonesia (Persero) Tbk (BRI) as the manager of the PUMK Program Cooperation. On this basis, BNI has signed a cooperation agreement with BRI as the manager of the PUMK Program Cooperation, namely Cooperation Agreement No. B.21/MBD/12/2022 and No. SBP/1/018 dated December 13, 2022, with a term of 5 (five) years from 2022 to 2027. In accordance with the direction of the Minister of State-Owned Enterprises, the distribution of PUMK will be focused on BRI as the manager of the PUMK Program Cooperation.

Micro and Small Business Guidance Program

BNI's fostered partners are micro and small business owners who lack technical familiarity with banking due to limited access to loans. These businesses operate across various formal and informal sectors, playing a crucial role in the real economy. It has been proven that the micro and small business segments are more resilient to economic crises. BNI aims to help these fostered partners enhance their business activities, capital, entrepreneurial mindset, access to banking services, business administration, product quality, and market reach.

BNI consistently provides guidance to its fostered partners, who are micro and small business owners, to help them improve their business governance and achieve better operational standards. By doing so, these partners are expected to become key drivers of economic growth in their local communities.

Based on the Regulation of the Minister of SOEs No. PER-05/MBU/04/2021 dated April 20, 2021 concerning the Social and Environmental Responsibility Program of State-Owned Enterprises, and its amendments, namely the Regulation of the Minister of SOEs No. PER-6/MBU/09/2022 dated September 15, 2022, the fostering fund for fostered partners is part of theTJSL fund distribution program that is being implemented. The distribution of this fostering fund is directed to increase the capacity of fostered partners.

Information on The Financial Report of The Micro and Small Business Funding Program (PUMK)

In accordance with Article 33, Paragraph 2 of the Regulation of the Minister of State-Owned Enterprises of the Republic of Indonesia No. Per-1/MBU/03/2023 concerning Special Assignments and the Social and Environmental Responsibility Program, the annual financial report of the UMK Funding Program must undergo an audit by a public accounting firm. For the fiscal year ending December 31, 2025, the audit of the PUMK Program Financial Report was conducted by the Public Accounting Firm Rintis, Jumadi, Rianto & Partner (formerly KAPTanudiredja, Wibisana, Rintis & Partner and a member firm of the Price water house Coopers network).

IMPLEMENTATION OF SROI FOR BNI BERBAGI PROGRAM

To assess the social impact and evaluate the implementation of the BNI BERBAGI Program, BNI has calculated the Social Return on Investment (SROI) for its TJSL Program. In 2024, BNI measured the impact of various programs and projects, including:

1. Borehole in Gunung Kidul (DIY), Score 3.54
2. BUMN House Bekasi (West Java), Score 2.62
3. Waste Management Program in Bogor (West Java), Score 2.20

Special Assignment

As SOE, BNI may receive Special Assignments from the Central Government to carry out public benefit functions as well as national research and innovation, in line with the Regulation of the Minister of SOE of the Republic of Indonesia No. PER-1/MBU/03/2023 dated March 3, 2023 concerning Special Assignments and Social and Environmental Responsibility Programs of State-Owned Enterprises.

BANKING SERVICES (FINANCING, TRANSACTIONS, AND AGENCIES) IN THE COFFEE PLANTATION ECOSYSTEM IN THE PMO KOPI NUSANTARA ECOSYSTEM

Indonesia ranks as the world's fourth largest coffee producing country. The potential for Indonesia to become a leading global coffee producer remains highly promising; however, it is challenged by several factors, including relatively low productivity, suboptimal processing quality, limited value added, and inefficient land utilization.

In response to these challenges, BNI introduced Jejak Kopi Khatulistiwa (BNI JKK), a social forestry development initiative focused on empowering local communities by establishing a green financing ecosystem for farmers and stakeholders within the coffee sector. BNI JKK builds a closed loop financial ecosystem that involves all stakeholders across the coffee value chain through three main stages, namely:

1. Digitalization of on-farm, off-farm and online market processes to realize UMKM Go Digital;
2. On-farm and off-farm coaching so that an environmentally friendly process occurs to realize Go ESG;
3. Grading to connect with the international market to realize UMKM Go Global, an assessment of coffee specifications is carried out including aroma, flavor, after taste, acidity and other characteristics with the following results:
   a. Garut Regency: Final Score 84,25 (Excellent)
   b. Rejang Lebong Regency: Final Score 81,5 (Excellent)
   c. Temanggung Regency: Final Score 84,13 (Excellent)
   d. Jember Regency: Final Score 78,5 (Very Good)

BNI Jejak Kopi Khatulistiwa has been running in 5 locations, namely Garut Regency (West Java Province), Rejang Lebong Regency (Bengkulu Province), Temanggung Regency (Central Java Province), Jember Regency (East Java Province) and Humbang Hasundutan Regency (North Sumatra Province).

Referring to the letter DPS/X/1566/2023 dated May 23, 2023, BNI is part of the Nusantara Coffee PMO together with SOE and related stakeholders in the Nusantara coffee & cocoa commodities. This program is an extension of the Social Forestry Program initiated by BNI since 2017. The Jejak Kopi Khatulistiwa program is considered aligned with environmental aspects, the proper use of forest land, financial inclusion, and through its coffee products and unique flavors, it has the potential to open up opportunities for MSMEs to go global. Through the synergy of this program, BNI aims to increase coffee productivity, which in turn will have an impact on the welfare of the stakeholders in Indonesia's coffee ecosystem.

By the end of 2025, the total distribution of People's Business Credit (KUR) in the Jejak Kopi Khatulistiwa program is IDR52.1 billion for 379 farmers. The distribution of Jejak Kopi Khatulistiwa KUR is part of BNI's Social Forestry KUR acquisition.

FINANCING FOR MSMES THROUGH LOW-INTEREST LOANS

In collaboration with the Indonesian government, BNI distributes People's Business Credit (KUR) to support the growth of MSMEs. For the 2025 fiscal year, BNI aims to allocate IDR11.79 trillion for KUR distribution, as outlined in the Letter from the Coordinating Ministry for Economic Affairs of the Republic of Indonesia No. B/KUR/282/D.I.M.EKON/12/2025 dated December 12, 2025.

To optimize the absorption of the National KUR ceiling and ensure the achievement of BNI's KUR distribution targets, it was determined that BNI's KUR distribution target for 2025 would be IDR11.79 trillion, as confirmed by the Letter from the Coordinating Ministry for Economic Affairs of the Republic of Indonesia No. B/ PK.KUR/282/D.I.M.EKON/09/2023 dated December 12, 2025.

The goal of KUR distribution is to assist small entrepreneurs by providing access to capital and fostering business development. By the end of 2025, BNI has provided KUR financing totalling IDR11.70 trillion, achieving 99.25% of the contribution target set by the Indonesian Government.

Distribution of KUR per Type of KUR as of December 31, 2025

Type of KUR	Number of Debtors	Maximum Credit (IDR Billion)	Target (IDR Billion)	Achievements (%)
Supermicro	18	0.18	5	3.50
Micro	6,634	534.11	535	99.83
Small	43,672	11,111.26	11,150	99.65
PMI	1,630	45.41	50	90.82
Specific	29	10.97	50	21.93
Total	**51,983**	**11,701.92**	**11,790**	**99.25**

KUR Distribution Based on Economic Sector as of December 31, 2024

Economic Sector	Number of Debtors	Maximum Credit (IDR Billion)
Manufacturing Industry	2,774	621.67
Services	8,749	1,847.89
Trade	32,440	7,528.15
Fisheries	322	69.89
Agriculture	7,698	1,634.33
Total	**51,983**	**11,701.92**

HOUSING PROGRAM CREDIT DISTRIBUTION

BNI supports the policy of the Government of the Republic of Indonesia through the distribution of Housing Program Credit (Kredit Program Perumahan or KPP) as part of the implementation of priority programs in the housing sector. In 2025, BNI was assigned a KPP distribution target of IDR500 billion on the supply side and IDR210 billion on the demand side, in accordance with the Letter of the Coordinating Ministry for Economic Affairs of the Republic of Indonesia No. B/PK.KUR/277/D.I.M.EKON/12/2025.

As of the end of 2025, BNI had disbursed KPP financing on the supply side amounting to Rp498.55 billion, achieving 99.71 percent of the assigned target, and on the demand side amounting to IDR209.83 billion, achieving 99.82 percent of the established target.

LABOR INTENSIVE INDUSTRY CREDIT DISTRIBUTION

BNI supports the policy of the Government of the Republic of Indonesia through the distribution of Labor Intensive Industry Credit (Kredit Industri Padat Karya or KIPK) as part of a financing program to enhance competitiveness, productivity, and business expansion in industrial sectors that absorb a large workforce. KIPK is distributed in the form of investment credit and working capital loans with subsidized interest rates.

For 2025, BNI was allocated a KIPK distribution target of IDR300 billion, in accordance with the Letter of the Coordinating Ministry for Economic Affairs of the Republic of Indonesia No. B/PK.PL/97/D.I.M.EKON/07/2025. As of the end of 2025, BNI had disbursed KIPK financing amounting to IDR5.53 billion, achieving a contribution level of 5.5 percent of the established target.

AGRICULTURAL MACHINERY AND EQUIPMENT BUSINESS CREDIT DISTRIBUTION

BNI supports the policy of the Government of the Republic of Indonesia through the distribution of Agricultural Machinery and Equipment Business Credit as part of efforts to enhance productivity and efficiency in the agricultural sector and to support the modernization of national agriculture. In 2025, BNI was allocated an Alsintan Credit distribution target of IDR25 billion.

As of the end of 2025, BNI had disbursed Alsintan financing amounting to IDR4.7 billion, achieving 18.96 percent of the established target.

MSME ACCELERATION WORKING GROUP

Based on the Decree of the Director General of Strengthening the Competitiveness of Marine and Fishery Products Number 51 of 2024 concerning the Working Group for Acceleration of Empowerment of Micro, Small, and Medium Enterprises (MSME) in the Marine and Fishery Sector, the establishment of the MSME Acceleration Working Group aims to expand access and increase the effectiveness of program credit distribution in the marine and fishery sector.

COFFEE AND COCOA COMMODITY BUSINESS DEVELOPMENT TEAM

Under the Decree of the Minister of State-Owned Enterprises (SOEs) Number SK-272/MBU/11/2024, a Coffee and Cocoa Commodity Business Development Team has been established with a mission is to foster an inclusive and sustainable coffee and cocoa commodity business by facilitating collaboration among various stakeholders in the supply chain. This collaborative effort aims to secure support for implementing advanced technologies to enhance productivity, availability, and quality within the sector.

KPR GRIYA FLPP (SUBSIDIZED MORTGAGE)

As part of its support for the national housing financing program, BNI has established cooperation with the Ministry of Public Housing of the Republic of Indonesia, as stipulated in a Memorandum of Understanding and an Operational Cooperation Agreement signed on October 25, 2010. This cooperation serves as the basis for the distribution of the Housing Financing Liquidity Facility (FLPP), under which BNI is mandated to channel Home Ownership Loans to Low Income Communities (MBR). Government funding support under the FLPP scheme is realized through the BNI Griya FLPP mortgage product, reflecting BNI's commitment to expanding access to affordable and sustainable home ownership.

BNI Griya FLPP represents a tangible manifestation of BNI's commitment to supporting government programs in providing housing financing for Low Income Communities (MBR). As of the end of 2025, BNI had realized the disbursement of BNI Griya FLPP financing amounting to IDR13,490 billion. In order to encourage broader financing distribution and ensure the achievement of targets by the end of 2025, BNI implemented several development strategies for BNI Griya FLPP, including the following:

1. To promote the absorption of BNI Griya FLPP, BNI cooperates with developer associations and subsidized housing developers, and conducts outreach activities in various regions by involving both external and internal stakeholders.
2. BNI optimizes the marketing of FLPP to payroll customers who meet the criteria for FLPP debtors.
3. BNI provides appreciation or rewards to subsidized housing developers as well as Payroll Customer Persons in Charge.
4. BNI offers fee relief or discounts on FLPP mortgage costs, including provision and administrative fees.

09

ESG COMMITMENT

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BNI agen46

BNI Environmental, Social, and Governance (ESG) Performance Highlights 2025

RATING ESG

01 MSCI

(A)

02 Sustainalytics

21,3
(Medium Risk)

03 Corporate Governance Perception Index (CGPI)

92.6/100

04 IDX ESG Leaders

Constituent Index
IDX ESG Leaders

05 IDX KEHATI

Constituent Index
ESG Sector Leaders

06 IDX KEHATI

ESG Quality
45 Index

07 IDX KEHATI

Constituent Index
SRI-KEHATI

* Rating Effective Period: December 2025 – May 2026

AWARDS



Silver Award

Asia Sustainability Reporting Awards (ASRA)



Finance Bank Sector: Governance Winner

Katadata ESG Index Awards 2025



Appreciated Diversity Inclusivity ESG Report

Investor Daily Indonesia



Appreciated Circular Economy ESG Report

Investor Daily Indonesia



Most Appreciated ESG Report

Investor Daily Indonesia



Best Literacy for Climate Resilience
Best Social Impact Category
BEST Innovative Conservation Category

Investing on Climate Editors Choice Award 2025 Investing on Climate



Sustainability Reporting: Governance Category
Republika



ESG Awards 2025
Platinum Category
Star Awards - Big Cap

Datatrust | Investortrust



ESG Awards 2025
Platinum Category Star Awards - Green Bond Issuer

Datatrust | Investortrust

OTHER AWARDS

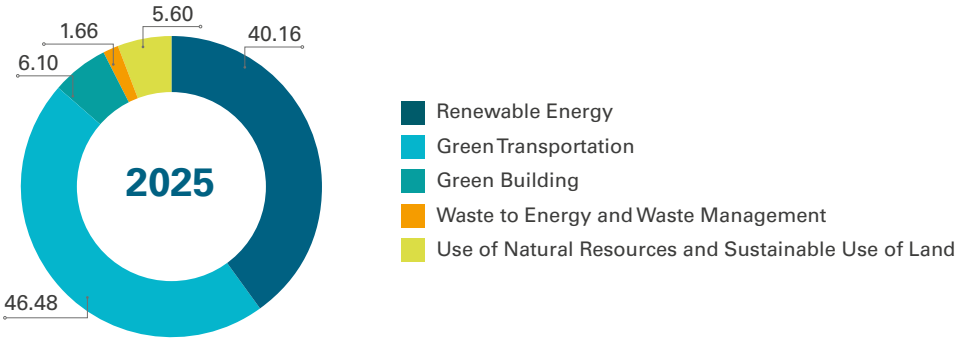
Awards	Organizer
1. Best Greenship Performance Award Category - New Building Platinum Rating for the BNI Plaza Building	Greenship Award 2025, Green Building Council Indonesia
2. Impact Excellence Awards Category	Datatrust | Investortrust
3. Platinum Alignment - Top 100 Indonesia 2025	La Tofi ESG Rating & Sustainability Communication Awards 2025, La Tofi School of Social Responsibility
4. Best Economic in Local Community	Indonesia Corporate Sustainability Award 2025, Olahkarsa & ACEXI
5. Leadership AA – Excellence Leader in ESG Transparency	Indonesia ESG Leadership Awards 2025, Bumi Global Karbon (BGK) Foundation
6. Best Social Impact Category, Investing on Climate Editors Choice Awards 2025	Investing on Climate
7. BEST Innovative Conservation, Investing on Climate Category Editors Choice Awards 2025	Investing on Climate

Progress in BNI's ESG Implementation 2025

ENVIRONMENTAL ASPECTS

a. **Financing:**
   1. BNI's green financing distribution (KUBL) reached IDR78.0 trillion, or 8.8% of total credit (bank only), a growth of 6.3% (YoY).
   2. Sustainability Linked Loans (SLL) distribution reached IDR6.6 trillion.
   3. BNI has allocated 100% of the proceeds from its Environmentally Conscious Bonds issued in 2022. The funds were allocated to green projects that meet the eligibility criteria for financing and have been validated by an Environmental Expert through a Second Party Opinion (SPO). This opinion confirms the positive environmental contributions of these projects. The allocation details for these green bonds are as follows:

Portion of Allocation
(%)



The following are impacts Green Bonds distribution:

Environmental and Social Impacts

Renewable Energy	1,626,666	(tCO_2eq/year)	Avoided GHG Emission per year
	1,771,833	(MWh/year)	Energy produced per year
Sustainable Transportation	23,741	(tCO_2eq/year)	Avoided GHG Emission per year
	341,019	Gj	Energy saving per year
Green Buildings	7,869	(tCO_2eq/year)	Avoided GHG Emission per year
Waste to Energy and Waste Management	249,976	(tCO_2eq/year)	Avoided GHG Emission per year
	1,543,090	(Tonne/year)	Total waste recycled
Sustainable Natural Resources & Land Use	626,342	(tCO_2eq/year)	Avoided GHG Emission per year
	55,899	(Trees)	Total trees planted in reforestation projects
	314,387	(Ha)	Total hectares protected and/or certified

Further details on the projects financed through BNI Green Bonds and their reported environmental impacts are available in the BNI Green Bond Report 2025. This report can be accessed on the BNI website under the Environment, Social, and Governance (ESG) https://www.bni.co.id/en-us/company/bniesg.

4. Issuance of Sustainable Bonds Phase I of 2025 with a value of IDR5 trillion as part of a Sustainable Public Offering (PUB) with a target fund of up to IDR15 trillion.
5. Determination of the NZE Financing Roadmap for 2060.
6. Calculation of financing emissions using the PCAF methodology for credit portfolios in the Corporate, Enterprise, Commercial, and Small Medium Enterprise (SME) segments.
7. Implementation of the Indonesian Sustainable FinanceTaxonomy (TKBI) version 2, in accordance with OJK directives, in four main sectors: Energy, Construction & Real Estate (CRE), Transportation & Storage (T&S), and parts of Agriculture, Forestry, and Other Land Uses (AFOLU), specifically the forestry and oil palm plantation sectors. The implementation of TKBI version 2 comes with Technical Assistant for borrowers in these four sectors.
8. Launch of the first Advisory Playbook for the palm oil sector in Indonesia that offers guidance for borrowers on the sustainability transition.
9. Calculation of the Climate Risk Stress Test (CRST) covering 100% of BNI's portfolio. By 2025, BNI's CRST has covered its entire credit portfolio. The stress test was conducted in accordance with the CRMS guidelines issued by the Financial Services Authority (OJK), which had adopted the Network for Greening the Financial System (NGFS) scenario. Transition risk analysis was conducted over three time horizons: short-term (2025, 2026, 2027), medium-term (until 2030), and long-term (until 2050). The stress test covered credit, market, operational, and liquidity risks. Meanwhile, physical risk analysis was conducted through stress tests on productive loans in the agriculture, forestry, and fisheries sectors under a forest fire scenario, and on property loans under a flood scenario over a one-year time horizon.
10. Strengthening the Risk Acceptance Criteria (RAC) for 23 industrial sectors for the Corporate and Enterprise segments, 18 industrial sectors for the Commercial segment, and 10 industrial sectors for the Small and Medium Enterprise (SME) segment, with ESG aspects.
11. Supporting Energy Transition and Eco Friendly Transportation Projects:
    a. Financing for the IDR5.4 trillion 4 x 87.5 Megawatt (MW) hydroelectric power plants (PLTA) in Kerinci, Jambi.
    b. Financing for the IDR3.6 trillion Jakarta-Bogor-Depok-Bekasi Integrated Rail Transit (LRT) mass transportation system.
    c. Financing for the IDR1.5 trillion a 515 Megawatt (MW) hydroelectric power plant in Poso, Central Sulawesi.
    d. Financing for the IDR1.0 trillion renewable energy power plant, a Wind Power Plant (PLTB) with a capacity of 75 Megawatt peak (MWp), in Sidrap, South Sulawesi.
    e. Financing for the IDR184 billion renewable energy power plant, a Solar Power Plant (PLTS) with a capacity of 25 Megawatt (MW), in Karangasem, Bali.

b. Operations:

1. Establishment of the 2028 Operational NZE Roadmap.
2. Development of an Emissions Management Platform to Automate Real-Time Operational Emission Calculations.
3. Carbon Emission Calculations Cover Scope 1, Scope 2, and Scope 3 (Operational).
4. Two BNI Headquarters Buildings have received Green Building Certification: Menara Pejompongan BNI with Gold Certification and Plaza BNI with Platinum Certification.
5. Installation of 2,200-watt solar panels for lighting at emergency stairs at Plaza BNI, BSD.
6. Electricity efficiency through reduced lighting usage at Grha BNI, Plaza BNI, Gedoeng BNI, and Menara BNI.
7. BNI became the first bank in Indonesia to utilize the Investor-Own-Investor-Operate (IO2) Partnership Public Electric Vehicle Charging Station (SPKLU) cooperation scheme from PLN.
8. Implementation of BNI Waste Management with a Zero Waste to Landfill Concept in five BNI Headquarter buildings. This program will be gradually expanded to Regional and Branch Offices in 2026, starting with pilot activities at the Bandung Regional Office.
9. Development of waste management for electronic waste, which would initially be implemented at the Head Office.

c. Supply Chain

As a manifestation of its commitment to the environment and responsible business practices, BNI ensures that every vendor/supplier it collaborates with has committed to environmental concerns. In the evaluation process for potential new suppliers, BNI applies environmentally-based criteria that include compliance with environmental permits, the

company's location adjacent to protected areas, and the management of greenhouse gas (GHG) emissions and waste.

SOCIAL ASPECTS

a. Human Resources (HR):

1. The Employee Engagement Score (EES) indicates that BNI's employee satisfaction level reached 35% in 2025. This employee engagement score fell under "Good," category. indicating employee engagement with BNI.
2. Development and Approval of the Respectful Workplace Policy.

b. Access to Finance:

1. BNI had 217,013 BNI Agen46, with 28,177 agents, or approximately 13%, located in underdeveloped, frontier, and outermost (3T) areas.
2. The Ayo Menabung dengan Sampah Program.
3. MSME empowerment programs through the BNI Environmentally Friendly MSME (BUMI) program, Jejak Kopi Khatulistiwa (JKK), the Fishery Cultivation Village, and others.

c. Privacy & Data Security

1. BNI had a CISO Division tasked with safeguarding information and enhancing cybersecurity, integrating people through training programs, processes through policy development, and technology aspects.
2. BNI has a Supporting Staff Group (SSG) that supports the coordination, monitoring, and consolidation of the implementation of privacy, cybersecurity, and data protection policies across all BNI work units, as well as committees supporting cybersecurity, such as the Risk Management Committee, the Technology Management Committee, and the Personal Data Protection Steering Committee.
3. Implementation of a Data Loss Prevention (DLP) mechanism as perimeter security to prevent credential theft and unauthorized access to confidential information.
4. Implementation of Threat Hunting by identifying suspicious activity, cyber-attacks, and shutting down fake websites that misuses BNI's name.
5. BNI operates a Fraud Detection System (FDS) that monitors suspicious transactions on debit cards, credit cards, and other e-channels.
6. Adopting international security frameworks and standards, such as ISO 27001 and the National Institute of Standards andTechnology (NIST), BNI's foundation for ensuring the continuity of secure digital banking services for customers.
7. BNI has established a personal data protection management framework in accordance with Law No. 27 of 2022 concerning Personal Data Protection, POJK No. 22 of 2023 concerning Consumer and Community Protection in the Financial Services Sector, and PBI No. 3 of 2023 concerning Bank Indonesia Consumer Protection.
8. Implementing a masking process for sensitive data to protect customer privacy. BNI uses encryption technology to protect internal and customer data, both stored and transmitted, to maintain the confidentiality of information from unauthorized parties.
9. BNI conducts regular security audits to assess the effectiveness of its information security system controls.
10. BNI implements Endpoint Detection and Response (EDR) to monitor endpoint activity in real time and respond quickly to security incidents and potential threats.
11. Network Access Control (NAC) is implemented to strengthen network access control and management, prevent unauthorized access, and ensure connected devices meet BNI security standards.
12. Every new product, application, or service development at BNI has gone through a Software Development Life Cycle (SDLC) process that encompasses comprehensive security controls, including risk assessments, design reviews, code reviews, configuration reviews, and penetration testing.
13. BNI regularly conducts security assessments to identify potential application gaps or vulnerabilities through Penetration Testing, Vulnerability Assessment, and Application Security Testing, including Static Application Security Testing (SAST) and Dynamic Application Security Testing (DAST).
14. BNI requires a Non-Disclosure Agreement (NDA) for third parties in any collaboration involving customer data, and only transfers customer data with the customer's consent.

15. Implementing regular security awareness sessions to educate employees and customers about the importance of maintaining the confidentiality and security of personal data.
16. BNI operates a Security Operation Center (SOC) that conducts 24/7 security monitoring.

d. Consumer Financial Protection

1. The Customer Satisfaction Survey (CSS) score in 2025 was 4.43 (on a scale of 1 to 5).
2. The customer complaint resolution rate in 2025 was 99.9%, with a total of 768,989 complaints resolved.
3. Providing training on consumer financial protection.

e. Supply Chain

As part of its serious commitment to social and responsible business practices, BNI ensures that vendors/suppliers are committed to social aspects when evaluating potential new suppliers using social criteria, including information on the absence of child labor, forced labor, freedom from racial and intergroup discrimination, and equality in employee promotion and remuneration.

BNI ensures that its data security management system encompasses the protection of supplier and business partner data, including individual personal data, corporate data, and transaction data through an e-procurement system equipped with information technology security. Personal data protection is also applied to suppliers or partners who hold accounts with BNI in accordance with applicable regulations.

GOVERNANCE ASPECTS

1. BNI has an ESG Subcommittee under the Risk Management & Anti-Fraud Committee, comprised of all members of the Board of Directors and chaired by the Deputy President Director. ESG aspects are overseen by the Board of Commissioners.
2. BNI has a dedicated work unit, the Environment, Social & Governance (ESG) Division operating under the oversight of the Deputy President Director.
3. BNI ESG Policy:
   a. The ESG sustainability pillar, which is an extension of the ESG framework by integrating the Sustainable Development Goals and BNI's five pillars of sustainability.
   b. The BNI ESG Roadmap, which is a long-term work plan (more than 10 years) for implementing sustainability practices at BNI. This ESG Roadmap will be developed into an ESG blueprint with a more comprehensive scope.
   c. As many as 26,143 BNI employees have participated in the sustainable finance competency development program, which is included in the Sustainable Finance Action Plan (RAKB).
   d. Determination of the strategy to achieve Net Zero Emissions operations by 2028.
   e. Technical Guidelines for Emissions Data.
   f. Technical Guidelines for Environmentally Conscious Business Activities (KUBL).
   g. SOP for Sustainability Linked Loans (SLL).
   h. SOP for Solid Waste Management for Head Office and Regional Offices.
4. The Board of Directors has established KPIs for ESG performance, which are distributed to Work Units (Green Loans and ESG Ratings).

For more complete information on sustainable finance, please see BNI's 2025 Sustainability Report.

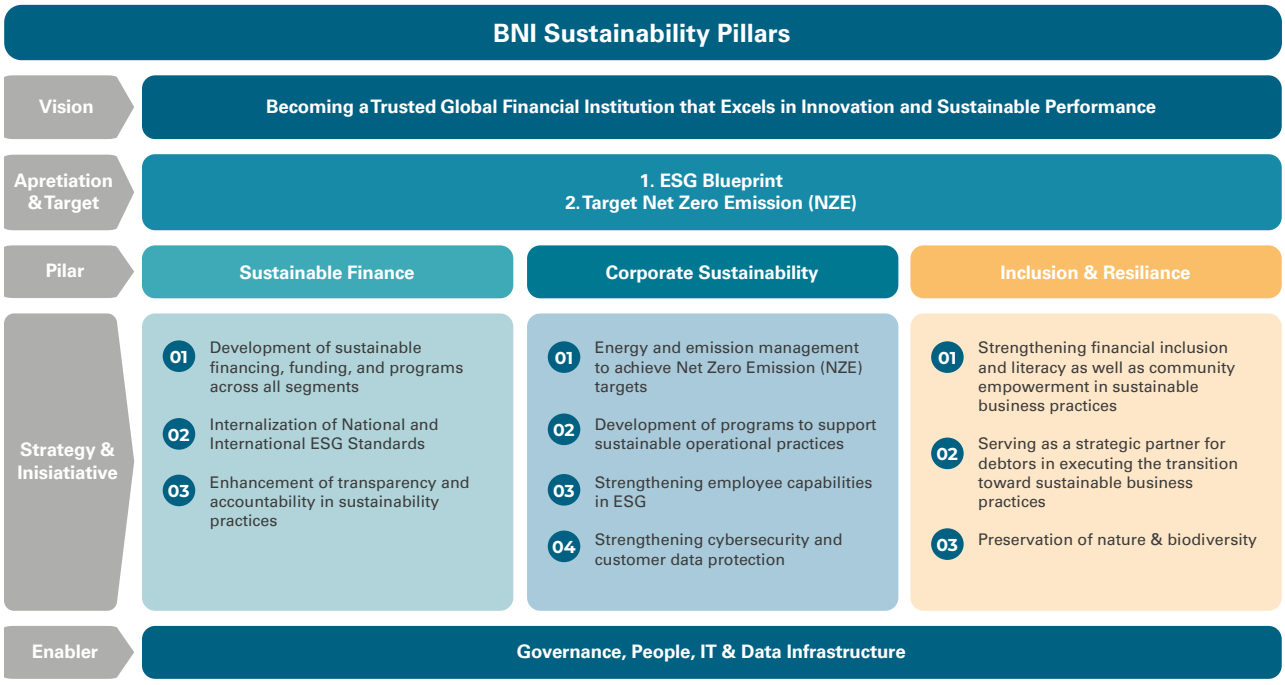
Commitment to Implementing ESG

ELEVATING IMPACT, EMPOWERING SUSTAINABILITY

BNI prioritizes the implementation of sustainability principles encompassing Environment, Social, and Governance (ESG) aspects across all areas of its business. This commitment has been further realized through measureable efforts to fulfill the achievement of the Sustainable Development Goals (SDGs). BNI believes that sustainability must deliver a positive impact for all stakeholders while simultaneously leaving a beneficial legacy for future generations. As a business entity primarily owned by the state, BNI continues to move forward as a leading agent of transformation.

BNI ESG PILLARS & ROADMAP

In 2025, BNI adjusted its ESG Framework into the BNI Sustainability Pillars. The BNI Sustainability Pillars are built upon three main focuses: Sustainable Finance, Corporate Sustainability, and Inclusion & Resilience, which encompass the management of economic, social, and environmental risks, including climate change risks. These Sustainability Pillars are the result of formulating the essence of BNI's five sustainability pillars and illustrate BNI's three primary focuses in sustainability management.



Three Main Focuses of BNI's ESG Pillars include:

1. **Sustainable Finance**: How BNI internalizes ESG aspects into its business processes, including credit, funding, and services.
2. **Corporate Sustainability**: How BNI internalizes ESG aspects into all of its operations. This strategy includes the implementation of sustainability practices in daily activities and the bank's internal governance. From an environmental perspective, the bank manages its operational carbon footprint through energy efficiency, process digitalization, waste management, and the responsible use of resources.
3. **Inclusion & Resilience:** Emphasizing BNI's role in supporting a just economic transition through the preparation of an ESG Advisory Playbook for debtors in high-emission sectors, and the alignment of CSR programs to support the achievement of the SDGs. These three pillars form an integrated strategic framework in strengthening BNI's contribution to a sustainable economy and long-term resilience.

Short-Term Focus (2024):	Medium-Term Focus (2025-2026):	Long-Term Focus (≥2027):
• Strengthening infrastructure • Setting NZE and Carbon Budget	• Strengthening Risk Acceptance Criteria (RAC) for debtors • Strengthening climate change risk management infrastructure • Strengthening the Board's involvement in LST • Optimizing data loss prevention	Implementation of climate change risk management in bank operations

TARGET NET ZERO EMISSION (NZE) BNI

BNI is committed to achieving Net Zero Emission (NZE) Operations by 2028 and NZE Financing by 2060. The strategies implemented to achieve these targets are as follows:

1. Sustainable product development, such as:
   a. Launching Sustainability Linked Loans to encourage debtors to implement ESG and have a transition map towards green.
   b. Distribution of Green Bonds for Green Projects currently being carried out in 5 sectors, namely Renewable Energy, Environmentally Friendly Transportation, Environmentally Friendly Buildings, Waste Management into Energy and Waste Management, and Sustainable Use of Natural Resources and Land Use.
   c. Issuance of a five trillion Phase I Sustainability Bond of 2025 as part of a Shelf-Registered Public Offering (PUB) with a target fund of up to Rp15 trillion. Further information regarding BNI's Sustainability Bond can be accessed in the BNI 2025 Sustainability Report.
   d. Development of financing schemes to support and develop environmentally oriented MSME ecosystems, such as the Equator Coffee Trail - Social Forestry and the BNI Environmentally Friendly MSME (BUMI) program.
   e. Financing in the energy transition sector to encourage the transition to clean energy.
   f. Collaborating with strategic partners to issue sustainability products for individuals, such as issuing environmentally friendly credit cards in collaboration with WWF and issuing credit cards with recyclable raw materials in collaboration with AMEX.
   g. Optimizing the savings program with waste to increase student awareness in managing plastic waste.

2. Energy Efficiency
   a. Use of energy-saving technology.
   b. Arrangement and optimization of the use of AC and lights in office buildings.
   c. Use of renewable energy in the BNI Plaza Building.
   d. Having a green building certified building, namely BNI Plaza Building and BNI Tower.
   e. Optimization of online media for meetings.
   f. Development of digitalization in BNI's operations and services.

3. Implementation of Net Zero Emission in Subsidiaries
   BNI recognizes that the achievement of Net Zero Emissions must be implemented across the entire business group. To this end, in 2025, BNI will align its Net Zero Emission efforts with those of its subsidiaries. This initiative began by mandating subsidiaries to conduct emission inventories and calculate Scope 1 and 2 emissions. These steps are also in preparation for the upcoming implementation of IFRS S1 & S2 in Indonesia.

4. Increasing Engagement and Awareness with Debtors and Customers for the Green Transition
   a. BNI is the first bank in Indonesia to issue an Advisory Playbook for the palm oil plantation sector. Subsequently, BNI is developing these Advisory Playbooks for 5 other high-emission sectors. These Advisory Playbooks serve as comprehensive guides to assist debtors in undergoing a green transition that is well-directed, measurable, and in accordance with global standards.
   b. BNI also conducts TKBI (Indonesian Green Taxonomy) Technical Assistance Workshops for debtors in the energy, AFOLU (Agriculture, Forestry, and Other Land Use), construction & real estate, and transport & logistics sectors. These focus on providing assistance to debtors' PICs in completing TKBI questionnaires as a form of refreshment regarding the TKBI framework. The goal is to enhance the understanding of debtors' PICs concerning the concepts and objectives of TKBI, provide technical guidance for accurate questionnaire completion, and provide an interactive forum for discussion, Q&A, and the resolution of technical constraints faced by debtors' PICs.
   c. BNI organizes BEST Events specifically for high-emission sectors such as energy, palm oil plantations, mining, and others. This forum is intended as an educational and experience-sharing platform to encourage debtors to develop transition roadmaps aligned with government policies and Indonesia's NZE targets.

5. Waste management
   In its waste management practices, BNI adopts the Zero-Waste to Landfill (ZWTL) concept, utilizing the 3R method (Reduce, Reuse, & Recycle). This approach reflects BNI's commitment to reducing operational emissions and optimizing its recycling program for waste generated by BNI buildings. Additionally, it aims to minimize and eventually eliminate direct waste disposal to the Final Disposal Site (TPA). Currently, waste management practices have been implemented at five BNI Head Office locations: Grha BNI, Menara BNI Pejompongan, Gedoeng BNI Kota, Plaza BNI BSD and DC Slipi.

   The expansion of program implementation to Regional Offices and Branch Offices is planned gradually in line with the results of the implementation evaluation. The first phase of expansion was setting Standard Operating Procedures (SOP) for Solid Waste Management at Regional and Branch Offices through cooperation with Waste Banks, MSMEs, or waste management vendors..

BNI ESG Risk Management

The Bank implements integrated Environmental, Social, and Governance (ESG) risk management as part of its comprehensive risk management framework to support business sustainability and long-term resilience. ESG risk management includes the identification, measurement, monitoring, and control of risks that could potentially affect the Bank's financial performance, reputation, and compliance, including climate risks that are becoming increasingly material as the impact of climate change on the financial sector grows.

The identification and measurement of ESG risks are conducted, in part, through the implementation of the Climate Risk Stress Test (CRST). BNI has conducted the CRST on 100% of its loan portfolio by referring to the Climate Risk Management System (CRMS) issued by the OJK, which adopts the Network for Greening the Financial System (NGFS) scenarios. Through the CRST, BNI can identify the potential impact of climate risks on debtor performance, including decreased cash flow, increased probability of default, and the implications for asset quality.

In the CRST, transition risk analysis is conducted across three time horizons: short-term (2025, 2026, 2027), medium-term (up to 2030), and long-term (up to 2050). The stress test covers credit, market, operational, and liquidity risks. Meanwhile, physical risk analysis is conducted through stress tests on productive loans in the agriculture, forestry, and fisheries sectors under forest fire scenarios, as well as on property ownership loans under flood scenarios within a one-year horizon.

At the control stage, the Bank implements ESG risk mitigation measures integrated into policies, procedures, and business processes. Control is exercised through the application of ESG due diligence in the financing process, the determination of sustainability requirements and clauses, exposure limits on high-risk sectors, and the strengthening of coordination between the risk management function and business units.

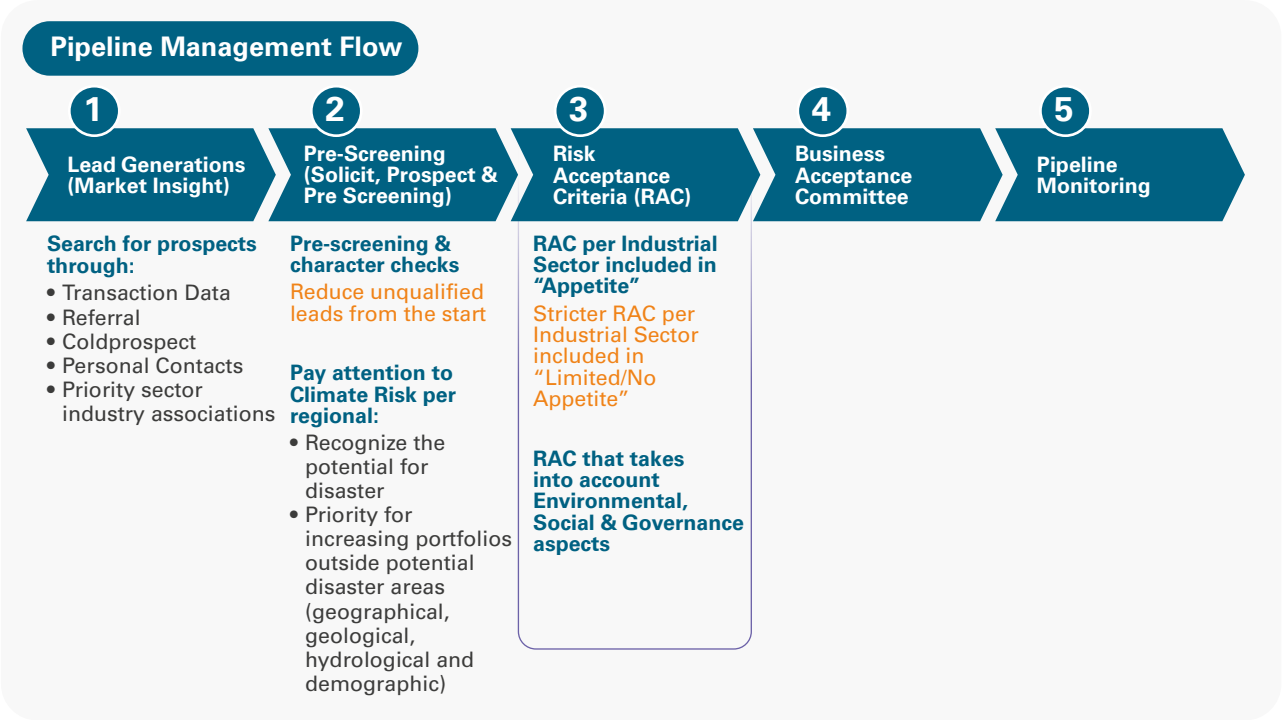
ESG risk management in credit is implemented throughout the end-to-end credit process. This process begins with the determination and evaluation of Risk Acceptance Criteria (RAC), which cover climate change mitigation and adaptation, Human Rights, and Occupational Health and Safety (OHS/K3) as part of pipeline management. Furthermore, the results of the risk analysis and mitigation of ESG aspects serve as the basis for determining credit terms and conditions, followed by continuous credit monitoring, including the fulfillment and realization of required ESG aspects. Additionally, ESG risk management is also conducted through financing exposure arrangements by applying Loan Exposure Limits (LEL), particularly for high-emission sectors. This policy serves as an anticipatory measure and a means to manage potential credit concentration risks.

ESG risk monitoring is performed through periodic evaluations of the financing portfolio, including monitoring debtor performance in sectors with high ESG risk levels. Any indication of an ESG violation will undergo further evaluation to assess the cause, materiality level, and potential impact on credit quality and the bank's risk exposure.

Based on these monitoring results, BNI can implement proportional corrective actions, ranging from providing improvement deadlines, adjusting financing terms, temporary suspension of credit facilities, and postponement of new financing processes, to requests for loan repayment. This mechanism ensures that ESG risks are managed systematically, documented, and aligned with credit policies, prevailing regulations, and good governance principles.

PIPELINE MANAGEMENT CONSIDERING ESG

BNI's Risk Management Flow can be explained through the following chart:



PIPELINE MANAGEMENT MECHANISM THAT CONSIDERS LST ASPECTS

1. The initial screening process focuses on identifying potential prospects that meet BNI's sustainability criteria, such as climate risks and the likelihood of natural disasters in specific regions. Additionally, this process ensures that businesses are not involved in activities prohibited by the government, including violations of local community rights, forced labor, child exploitation, human rights abuses, and other regulatory breaches.
2. Moreover, BNI aims to select businesses operating in sectors that have embraced sustainable financial principles or have prioritized ESG factors in their operations, even though this implementation is still a work in progress and being gradually improved. Based on these factors, BNI classifies industrial sectors into three categories: Appetite, Limited Appetite, and No Appetite.
3. In an effort to support pipeline management, BNI has strengthened the Risk Acceptance Criteria (RAC) to 23 (twenty-three) industrial sectors for the corporate segment, 18 (eighteen) industrial sectors for the commercial segment and 10 (ten) industrial sectors for the retail productive segment.
4. The credit committee will analyze the debtor/potential debtor, including all risks and risk mitigation, before deciding to approve or reject credit, including issues related to LST. The Credit Committee is structured in a hierarchical manner according to the authority to make decisions, up to the Board of Directors.
5. Pipeline Monitoring:
   Periodically, the Business Unit will monitor through a watchlist system and assess the debtor's rating. If violations of the LST aspects are found, BNI will verify with the relevant parties and can adjust the debtor's rating if it is proven that the debtor does not meet the established LST aspects. In the event that evidence of a violation is found, BNI may implement proportional corrective actions, ranging from providing improvement deadlines, adjusting financing terms, temporary suspension of credit facilities, and postponement of new financing processes, to requests for loan repayment. This mechanism ensures that ESG risks are managed systematically, documented, and aligned with credit policies, prevailing regulations, and good governance principles.

IMPROVEMENTS IN ESG RISK MANAGEMENT

In 2025, BNI continued to make improvements and refinements to Risk Management regarding ESG aspects, including:

a. BNI has identified high-emission sectors within the credit portfolios of the Corporate, Enterprise, Commercial, and Small Medium Enterprise segments. For these high-emission sectors, BNI manages the portfolio through Loan Exposure Limits (LEL) in each respective industry.
b. Strengthening the Risk Acceptance Criteria to cover 23 sectors for the Corporate & Enterprise segment, 18 sectors for the Commercial segment, and 10 sectors for the Small Medium Enterprise (SME).
c. Strengthening the methodology for calculating BNI's financed emissions using the PCAF (Partnership for Carbon Accounting Financials) methodology for the Corporate, Enterprise, Commercial, and Small Medium Enterprise credit portfolios.
d. Implementing debtor classification based on the Indonesian Sustainable Finance Taxonomy (TKBI) Version 2 in accordance with OJK directives, conducted across 4 main sectors: Energy, Construction & Real Estate (CRE), Transportation & Storage (T&S), and parts of Agriculture, Forestry and Other Land Uses (AFOLU)—specifically the forestry and palm oil plantation sectors.
e. Expanding the scope of the CRST implementation; whereas in 2024 the CRST only covered 50% of the credit portfolio, by 2025 the CRST covered BNI's entire credit portfolio.
f. Conducting the identification of climate-related risks and opportunities as part of the preparation for the implementation of PSPK 1 and 2.

Person in Charge of LST Implementation at BNI

BNI has a dedicated body responsible for the implementation of ESG aspects: the Environment, Social, and Governance (ESG) Subcommittee. This subcommittee was formed by the Board of Directors through its Decree No. KP/484/DIR/R dated October 26, 2021 and was later updated based on Decree No. KP/454/DIR/R dated September 10, 2025. The ESG Subcommittee operates under a Board-level Committee, specifically the Risk Management & Anti-Fraud Committee. The membership structure of the ESG Subcommittee is as follows:

Chairman	Deputy President Director
Vice Chairman	Risk Management Director
Secretary	Enterprise Risk Management Division Head (concurrently as permanent non-voting member)
Permanent Members at the Director Level and SEVP (Voting Member)	1. Finance & Strategy Director 2. Corporate Banking Director 3. Treasury & International Banking Director 4. Institutional Director 5. Commercial Banking Director 6. Consumer Banking Director 7. Network & Retail Banking Director 8. Operations Director 9. Information Technology Director
Permanent Members at the Director Level (Non-Voting Member)	Human Capital & Compliance Director
Permanent Members at the Division/ Unit Level (Non-Voting Member)	1. Enterprise Risk Management Division Head 2. Operational Risk Management Division Head 3. Corporate Credit Risk Division Head 4. Enterprise Credit Risk Division Head 5. Commercial Credit Risk Division Head 6. Corporate Planning & Performance Management Division Head 7. Investor Relations Division Head 8. Subsidiaries Management Division 9. Procurement & Fixed Assets Division 10. Corporate Banking 1 Division Head 11. Corporate Banking 2 Division Head 12. Corporate Banking 3 Division Head 13. Corporate Banking 4 Division Head 14. Syndication & Structured Finance Division Head 15. Enterprise Banking Division 1 Division Head 16. Enterprise Banking 2 Division Head 17. Commercial Banking 1 Division Head 18. Commercial Banking 2 Division Head 19. SME Business Division Head 20. Business Program Division Head 21. International & Financial Institutions Division Head 22. Treasury Division Head 23. Consumer Product Division Head 24. Card Business Division Head 25. Agen46 Division Head 26. Compliance Division Head 27. Policy Governance Division Head 28. Human Capital Strategy Division Head 29. Human Capital Services Division Head 30. BNI University Division Head 31. Corporate Secretary Division Head
Non-permanent Members (Non-Voting Member)	Director/SEVP/Division/Unit Head related to the discussion topic

The ESG Subcommittee has the following duties and responsibilities:

1. Prepare Environmental, Social & Governance management policies and strategies and their changes;
2. Identify potential LST risks that have an impact on both BNI and BNI stakeholders;
3. Monitor the implementation of sustainable financial strategies;
4. Monitor, evaluate, and provide recommendations on the results of BNI's LST assessment;
5. Evaluate the implementation of LST strategies in all BNI business lines.
6. Coordinate between units to formulate objectives and implementation guidelines for the TJSL Program;
7. Conduct mapping and development of the BNI TJSL Program;
8. Perform evaluations of the implementation of the BNI TJSL Program.

Meanwhile, the management of sustainability aspects, including climate risk, is part of the responsibility of all work units under the supervision of the Board of Commissioners and the Board of Directors. To ensure the implementation of sustainability governance and the oversight of sustainable finance implementation, BNI has a specialized work unit, namely the Environmental, Social & Governance Division. The Environmental, Social & Governance Division has the following primary duties:

1. Implement all development, creation, and execution activities for strategies, frameworks, and policies related to BNI's ESG blueprint and roadmap, including its alignment with the BNI Group to achieve the goals set by BNI Management;
2. Develop strategies and communication management to support ESG implementation across all units in BNI and the BNI Group;
3. Prepare ESG-related reports for both internal and external parties in accordance with applicable regulations;
4. Manage the BNI-wide ESG portfolio and provide advisory and consultancy activities related to the implementation of sustainability, ESG, and/or energy transition to debtors, in coordination with relevant business units;
5. Establish cooperation and maintain good relations with government/non-government institutions, educational bodies, rating agencies, associations, and other organizations to support the achievement of BNI's ESG targets and development.

Supervision and Evaluation of BNI's LST Implementation

LST risk management in BNI's environment can be seen in the following image:



The monitoring and evaluation of BNI's ESG implementation are conducted by the Board of Directors and the Board of Commissioners to ensure the implementation of good governance, encourage responsible business practices, and prioritize prudence in risk management across all work units.In terms of ESG risk oversight, the Board of Commissioners monitors the progress of business strategies aligned with climate management. The Board of Directors, through the Deputy President Director and the ESG Subcommittee, plays a role in formulating, implementing, and monitoring sustainability policies and practices at BNI.

In the ESG management process, sustainability practices are executed across various divisions, including the ESG Division, Operations Management Division, Risk Management Division, and Business Management Division. The internal control function for sustainability practices is carried out by Internal Audit.

IMPLEMENTATION OF SUSTAINABLE FINANCE IN SUBSIDIARIES

The implementation of sustainable finance in BNI's subsidiaries has been carried out by preparing and submitting a Sustainable Finance Action Plan (RAKB) to the Financial Services Authority (OJK).

PT BNI Multifinance

In 2025, PT BNI Multifinance has planned and begun implementing sustainable finance activities as outlined below:

A. **Environment**

From an environmental perspective, the Company has implemented the following initiatives:

1. Financing eco-friendly motor vehicles in the form of battery-powered electric vehicles.

Booking Realization

Tipe Kendaraan Listrik	2024 Unit	2025 Unit
Electric Vehicle (EV)	469	472
Hybrid	768	690
Total	**1,237**	**1,162**

Realized financing (bookings) for electric vehicles in 2025 reached 40.6% of total new bookings, an increase from 37.9% in 2024.

2. Use of electric vehicles as operational vehicles in companies.
3. Energy-saving initiatives in the office environment, such as turning off air conditioners (AC), efficient electricity use, efficient paper use (paperless office), and minimizing the use of bottled water in the office environment.
4. In line with the Financial Services Authority (OJK) directive that the multifinance industry support real sector growth, the portion of financing to the productive sector increased from 21% (2024) to 27% of the total financing portfolio in 2025.

B. **Sosial**

From a social perspective, the company has implemented the following:

1. Developing internal company capacity through RAKB socialization
   Participation in training and socialization in 2025 includes:

Training Name	Type	Date	Organizer
Sustainability Accounting and Reporting in the Financial Services	Webinar	March 6, 2025	OJK
Dissemination and Socialization of the Guidelines for Access to Financial Services for Empowered Persons with Disabilities (SETARA Guidelines)	On line	April 22, 2025	OJK
Training Program for Preparing Sustainable Financial Plans (RAKB)	Offline	April 23-24, 2025	LPPI
Socialization of Whistle Blowing System (WBS) Procedures.	On line	May 21, 2025	BNI Finance
Socialization of Self-Assessment on Compliance with Consumer and Community Protection Provisions in the Financial Services Sector.	On line	July 17, 2025	OJK
Discussion of the Study on Sustainable Finance Product Development.	On line	September 17, 2025	OJK
Risk Appetite and Risk Culture: Key Pillars in Strengthening Risk Management in the Financial Sector.	Webinar	October 9, 2025	OJK
Policies and Procedures on Gratification Control	On line	October 30, 2025	OJK

2. Improving employee competence through Financing Professional Certification

Certification Status	Total	Percentage (%)
Uncertified	21	7.1%
Certified	273	92.9%
Total	**294**	**100.0%**

Number of Certifications	Certification Status		Total
	Uncertified	Certified	
Audit	5	16	21
Managerial	14	102	116
Collection	2	155	157
Total	**21**	**273**	**294**

3. Social activities for the environment and community:
   The company continuously carries out social activities, including providing assistance to orphans and the underprivileged around its Headquarters in the Karet Kuningan area of South Jakarta. In addition, the company regularly donates sacrificial animals through the MNC Peduli program.
4. The company is committed to protecting customer and company personal data in accordance with legal requirements. In this context, the company obtained ISO 270001:2022 certification in 2024. It successfully maintained this ISO 270001:2022 certification in 2025.
5. To increase public understanding of financial products, the company actively participates in financial literacy activities, collaborating with universities, and through various events held by its partners and parent company.

C. Governance

To support the implementation of the RAKB, the company has strengthened and refined the existing framework throughout 2025, including:

1. Strengthening the role of the Board of Commissioners in overseeing the Board of Directors' policies, GCG implementation, risk management, and compliance through committees and directly through regular Board of Commissioners meetings.
2. Adjusting the organizational structure to strengthen the control function, including:
   a. Establishing a Risk Management Directorate led by the SEVP of Risk and a Collection Directorate led by the SEVP of Collection.
   b. Establishing an Enterprise Risk Management (ERM) Division overseeing the ERM and ORM Departments.
   c. Establishing an Operational Risk Management (ORM) Department. During 2025, the ORM Department conducted RCSA (Risk Control Self-Assessment) activities in 52 branches, covering branch activities from application entry to portfolio entry (Go Live) as well as collection activities.
3. Updating and improving the governance policies of the Committees under the Board of Directors

PT BNI Sekuritas

BNI Sekuritas has developed a Sustainable Finance Plan with three main focuses: the development of sustainable financial products and services, capacity building related to internal awareness of sustainable finance, and the integration of ESG aspects through organizational adjustments, risk management, governance, and standard operating procedures.

BNI Sekuritas has implemented a number of sustainable finance activities planned for 2025, including:

1. Sustainable Participation in IDX Carbon
   As a manifestation of its commitment to the transition to a low-carbon economy, BNI Sekuritas strengthened its participation in the Indonesian Carbon Exchange (IDX Carbon) by adding 6,250 carbon units on January 12, 2025, bringing its total ownership to 46,250 carbon units. This step reflects the Company's consistent support for the national policy of reducing greenhouse gas emissions, achieving the NZE target, as well as the national and BNI Group emission reduction targets. This active participation also strengthens BNI Sekuritas' position as a sustainability-

oriented capital market player and supports the development of a transparent, credible, and integrated domestic carbon trading ecosystem.

2. NZE Contribution and Community Empowerment Through Mangrove Conservation
   BNI Sekuritas implemented an environmental initiative in the form of a mangrove forest conservation and rehabilitation program in Cilacap, Central Java, on March 20, 2025, as an effort to mitigate climate change and preserve the ecosystem. In collaboration with Fairatmos and the Jaga Wana Segara Cooperative, this program included the planting of 3,000 mangrove seedlings, which not only function as ecosystem restoration but also have carbon economic value. This initiative prioritizes local community empowerment through active involvement in the nursery, planting, and monitoring processes, thereby creating a sense of ownership and sustainable economic opportunities. Through this program, BNI Sekuritas affirms its strategic role in supporting the transition to a low-carbon economy and contributing to the achievement of the national target of reducing greenhouse gas emissions and the Sustainable Development Goals (SDGs).

3. Participation in the BNI Group's Earth Hour 2025 Program
   As part of the BNI Group, BNI Sekuritas participated in the Earth Hour 2025 Program, which was held on March 21, 2025, involving its Head Office (Indofood Tower and IDX Tower) and several outlets. This participation reflects the Company's commitment to energy efficiency and environmental preservation, in line with its sustainability strategy and implementation of ESG principles. This initiative also supports increasing awareness among BNI Sekuritas employees and stakeholders regarding greener and more responsible operations, and is part of the implementation of the RAKB (Sustainable Finance and ESG) and supports the BNI Group's NZE targets.

4. Sustainable Finance and ESG-Based Investment Assistance
   Through its Investment Banking Business Sector, BNI Sekuritas plays an active role in the development of a sustainable capital market as an underwriter and strategic partner for the issuance of sustainable finance and ESG-based investment instruments. Throughout 2025, the Company will be involved in issuing various green, social, and sustainable investment products to support the financing of projects with positive impacts on the environment and society and to strengthen its position in the sustainable investment sector, with a total issuance value of IDR25.7 trillion. In line with BNI Group policy, BNI Sekuritas is committed to being a catalyst for the development of a green ecosystem in the Indonesian capital market by connecting business actors to green funding sources, while simultaneously strengthening the Company's reputation as an adaptive, responsible, and long-term sustainability-oriented financial institution.

5. Sustainable Finance Training
   As a manifestation of its ongoing commitment to strengthening internal capacity and employee understanding of sustainable finance principles, BNI Sekuritas held an internal training program titled "BNI Sekuritas Sustainable Finance 2025 – Empowering Business Towards a Greener Future" online on September 4, 2025, in collaboration with the Center for Environmental, Social, and Governance Studies (CESGS) at Airlangga University. This training was attended by 225 employees from the Head Office and all BNI Sekuritas outlets and was designed to improve literacy and capacity in the integrated application of ESG principles across all business lines and operations. The training material covered global and regional sustainable finance trends, the increasing market demand for green financial products, the role of product innovation and sustainable investment, and areas for improvement in integrating sustainability into BNI Sekuritas' business strategy.

6. #SiPalingHijau Internal Program
   BNI Sekuritas launched an environmentally friendly human resources (HR) program aimed at encouraging and rewarding all BNI Sekuritas employees to actively use low-emission public transportation. This program aims to foster more sustainable transportation habits, both for daily commuting and attending meetings. This initiative will be implemented from October 6–17, 2025, as a concrete step by the company to support climate change mitigation efforts. Furthermore, to increase participation and enthusiasm among all BNI Sekuritas employees, the company is providing special recognition to participants with the highest points, who will receive prizes for their contributions to supporting sustainable mobility.

7. Energy and Emissions Management
   As an ongoing commitment to supporting the BNI Group's NZE directive, BNI Sekuritas has resumed its implementation of energy consumption monitoring across a number of the Company's operational activities. This ongoing effort includes recording energy consumption at the BNI Sekuritas Head Office, including

electricity usage, operational vehicle fuel usage, and paper usage. This effort aims to obtain accurate baseline data as a basis for planning energy efficiency programs and reducing carbon emissions.

In addition, the company has begun documenting data on air travel by the Board of Commissioners, Directors, and employees.This information will be used to calculate the carbon footprint of air travel activities. Through this initiative, BNI Sekuritas affirms its commitment to sustainable finance principles and environmental responsibility, in line with the company's vision to become a financial institution that significantly contributes to achieving national sustainability targets.

8. Implementation of Corporate Social Responsibility (CSR) Programs
   BNI Sekuritas is committed to supporting sustainable development through collaboration with strategic partners. Together with Karya Salemba Empat ("KSE"), the Company runs a social responsibility program in the form of scholarships, financial literacy, and internship opportunities for students to increase the capacity of the younger generation and promote educational inclusion and financial literacy. Furthermore, BNI Sekuritas collaborates with Cemara Paper in a recycling program for used paper, which is processed into valuable products for people with disabilities, as a manifestation of environmentally friendly practices and sustainable social empowerment.

9. Improving Governance and Management Systems
   BNI Sekuritas consistently strengthens its commitment to implementing GCG principles, including through the implementation of the Personal Data Protection Law ("PDP Law") and enhancing cybersecurity throughout the company. The company also conducts surveillance audits of several internationally certified management systems, including those certified by the International Organization for Standardization ("ISO"):
   - ISO 37001:2016 Anti-Bribery Management System ("ABMS");
   - SO 27001:2013 Information Security Management System ("ISMS"); and
   - ISO 22301:2019 Business Continuity Management System ("BCMS").

   These achievements demonstrate the company's consistent commitment to strengthening governance and operational integrity, which was recognized through its award as a Trusted Company at the 2024 Corporate Governance Perception Index ("CGPI").

PT BNI Life Insurance

BNI Life Insurance has implemented a number of sustainable finance activities planned for 2025, including:

1. Improving operational efficiency by accelerating the digitalization of business processes and customer services (e-policy, bPOS, Mobile DigiClaim), supported by integrated risk management and the implementation of sustainable investments;
2. Continuously developing employee capabilities through structured development programs and strengthening the implementation of a superior and performance-oriented corporate culture;
3. Implementing a sustainable finance training program with a total of 859 employees;
4. Implementing sustainable social, environmental, and literacy programs through natural disaster relief initiatives, supporting the construction and improvement of religious facilities, social and health assistance, improving access to education, and environmental preservation;
5. Expanding the penetration of productive credit life insurance in the MSME segment through targeted and collaborative marketing programs to support financial inclusion and sustainable business growth;
6. Conducting regular organizational evaluations and improvements through comprehensive business process reviews and strengthening digitalization to support operational effectiveness and the management of sustainable finance activities;
7. Consistently implement Good Corporate Governance by strengthening the principles of transparency, accountability, and compliance with all applicable provisions and regulations;
8. Implement the Road to Zero Emissions program by increasing efficiency and controlling carbon emissions in Scope 1 (operational use of freon and fuel) and Scope 2 (electricity consumption), along with reducing plastic and paper waste, and optimizing water use efficiency.

Description	Usage	
	2024	2025
Electricity:		
Centennial Tower	1,160,892 kWh	867,673 kWh
BNI Life Building, KS. Tubun	713,809 kWh	767,791 kWh
Total Electricity	1,874,701 kWh	1,635,464 kWh
Water:		
Centennial Tower	500 m^3	263 m^3
BNI Life Building, KS. Tubun	5,080 m^3	7,286 m^3
Total Water	5,580 m3	7,549 m^3
Paper	1,832,789 Sheets	1,532,459 Sheets
Plastic	Already implemented for 30 rooms.	Already implemented for 30 rooms.

PT Bank Hibank Indonesia

In 2025, in line with the RAKB implementation strategy, hibank Indonesia focused on increasing its financing portfolio, investments, or placements in financial instruments or projects aligned with the implementation of Sustainable Finance, supported by activities such as:

1. Advanced human resource development;
2. Increasing the portfolio of credit disbursement to KUB (Small Business Units), placement in sustainable bonds, and sales of Sri-Kehati index mutual funds;
3. Supervision and reporting in accordance with regulatory requirements;
4. Developing a business management system that integrates social, environmental, and governance components into risk management; and
5. Piloting debtor mapping based on TKBI criteria.

As part of its sustainable finance implementation, hibank consistently strengthens the integration of environmental, social, and governance aspects into its business activities. These efforts are carried out through the development and implementation of internal policies and guidelines that serve as references for managing sustainability risks, particularly in credit, financing, and sustainable financial products and services. This integration aims to ensure that hibank's business processes are aligned with prudent principles and support long-term value creation.

Environmental Aspect

hibank continues to encourage the continuous improvement of its financing portfolio for Sustainable Business Activities (KKUB). The KKUB portfolio mapping is conducted using a methodology established by the regulator, using a sampling approach to existing borrowers. The results of this mapping serve as the basis for hibank to monitor the development of its sustainable portfolio while strengthening its financing disbursement strategy that supports the transition to a sustainable economy.

In addition to financing disbursement, hibank also optimizes fund management by investing in investment instruments based on sustainability principles, including green bonds and mutual funds with sustainability criteria. This step reflects hibank's commitment to supporting green financing while expanding its contribution to the development of sustainable financial markets.

The following are initiatives in the sustainable finance aspect that have an environmental impact:

- hibank is committed to continuously increasing its financing portfolio for Sustainable Business Activities (KKUB). The loan portfolio for KKUB has increased compared to the previous year.
- The KKUB portfolio mapping is conducted using a methodology that adheres to regulatory requirements through a sampling approach of existing debtors.
- hibank continuously develops fund placements in sustainability-based investment instruments, including sustainable bonds and the Sri-Kehati Index mutual fund.
- Funding support is provided through credit facilities for the Sustainable Business Activity Category (KKUB), which consists of eight categories of Sustainable Business Activities, including MSMEs.

As part of strengthening environmental impact management, hibank is gradually measuring and managing greenhouse gas emissions. hibank has calculated and inventoried Scope 1 and Scope 2 emissions data from operational activities, referring to the Intergovernmental Panel on Climate Change 2006 (IPCC-2006) standards and using national emission factors sourced from Bank Indonesia's Green Calculator for 2025.

Furthermore, hibank has developed a methodology and calculated Scope 3 emissions, referring to the BUKU 3 Carbon Emission Calculation Method for Climate Risk Management and Scenario Analysis (CRMS) for 2024, provided by the Financial Services Authority (OJK). Emission calculations, in accordance with the BUKU 3 Carbon Emission Calculation Method for CRMS for 2024, use the methodology developed by the United Nations Framework Convention on Climate Change (UNFCCC).

Scope 3 emissions are emissions not directly generated by company activities. Currently, the Scope 3 emissions calculated by hibank include financed and non-financed emissions. Financed emissions are emissions arising indirectly from financing activities or the provision of credit by hibank to debtors. Non-financed emissions, currently calculated only include business travel and employee commuting.

Scope 3 emissions, in the form of financed emissions, are used as the basis for calculating the Climate Risk Stress Test (CRST), which was submitted to the Financial Services Authority (OJK) in August 2025 to assess the potential impact of climate risk on the hibank's portfolio. In line with this effort, the calculation of non-financed emissions from business travel and employee commuting activities is expected to complement the scope of the hibank's emission measurement in a more comprehensive manner and support the strengthening of risk management strategies and the implementation of sustainable finance.

In addition, hibank also makes calculations on electricity, water and paper resources, as shown in the following table:

Electricity, Water, and Paper Usage at the Head Office (formerly KP Tomang and New KP Rajawali Place)

Component	Unit	2023	2024	2025	YoY Growth
Electricity	kWh	1,204,620	551,435	792,679	
Water	Cubic	7,096	3,573	4,959	
Paper	Rim	2,410	1,896	1,535	
- Size A4	Rim	2,327	1,864	1,530	
- Folio Size	Rim	83	32	5	

In 2025, the use of electricity, paper, and water resources at the hibank Head Office was recorded as follows:
1. Electricity usage in January-December 2025 averaged 792,679 kWh, a 44% increase from 551,435 kWh in January-December 2024;
2. Clean water usage in January-December 2025 averaged 4,959 cubic meters, a 39% increase from 3,573 cubic meters in January-December 2024;
3. Paper usage in January-December 2025 was 1,535 reams, a 19% decrease from 1,896 reams in January-December 2024.

Social Aspect

In terms of social aspects, hibank consistently implements a series of sustainable actions, including:
1. hibank supports the empowerment of the MSME ecosystem by collaborating with several parties to organize MSME digital markets, including:
   - hibank Digital Market MSME Xtra Ordinary Food Festival at Blok M Square, DKI Jakarta, April 4-13, 2025;
   - hibank Digital Market MSME Bantul, held at Sultan Agung Stadium, Bantul, Yogyakarta, April 15-20, 2025; and
   - Bazaar MSME Semarak Merdeka, held at the South Jakarta Mayor's Office, DKI Jakarta, August 5-7, 2025.

2. hibank has consistently distributed funding to the MSME community through a channeling scheme through fintech platforms focused on MSMEs.
   - hibank organized "Jumpreneur," which is intended to provide employees with the opportunity to gain experience as MSME entrepreneurs and provides space for MSMEs by opening food and beverage stalls every weekday at the Head Office. This activity involved 53 MSMEs and successfully recorded a total sales turnover of IDR336,189,199 from January to December 2025.

3. hibank consistently maintains a positive work culture through the application of the principles of Diversity, Equity, Inclusivity, and Belonging (DEIB) throughout its people lifecycle management, encompassing HR management from recruitment and development to performance and talent management. As part of its sustainable people lifecycle management, hibank actively listens to employees through an Employee Engagement Survey, which serves as a strategic feedback moment. The survey results serve as the basis for hibank to take targeted improvement measures, particularly in terms of employee development.

4. hibank has provided competency development to employees through training totaling 25,916.97 hours of training, or an average of 48 hours per employee.

Governance Aspect

In terms of Sustainability Governance, hibank has undertaken various initiatives related to sustainability, including:

- hibank has issued Company Guidelines No. 2.2.0.0/R.00/PP/VIII/2024 concerning the Environmental, Social, and Governance (ESG) Policy, which serves as the primary reference for developing more detailed procedures and technical guidelines to integrate social, environmental, and governance risks into hibank's business and operational activities.

- In line with internal provisions related to the Environmental, Social & Governance (ESG) Policy, where one of the environmental aspects of the framework is related to climate change management, hibank is committed to identifying and mapping transition and physical risks, as well as calculating and reporting emissions data. To implement this commitment, hibank has issued internal provisions in Company Guidelines No. 2.2.1.0/R.00/PP/XII/2025 dated December 29, 2025, concerning Emission Calculation Procedures.

- In 2025, hibank issued Directors' Decree Number: 27.03/S.Kep.Dir-EOR/III/2025 concerning the Environmental, Social and Governance (ESG) Sub-Committee of PT Bank Hibank Indonesia on March 27, 2025. The objectives of establishing the ESG Sub-Committee include strengthening the quality of infrastructure projects supported or financed by the bank, maximizing environmental, social, and governance benefits and preventing negative impacts on society and the environment, and strengthening hibank's capacity to manage ESG and providing guidance for the development of ESG procedures.

- hibank has developed a Climate Risk Management & Scenario Analysis (CRMS) to build an understanding of climate risks, data, governance, and scenarios. Furthermore, the Bank calculated the impact of climate risk through Climate Risk Stress Testing (CRST) with 100% portfolio coverage and submitted the CRST results to the Financial Services Authority (OJK) by the end of August 2025. Through this initiative, hibank mapped various climate scenarios, both physical and transitional, to assess how extreme conditions, regulatory changes, or shifts in market preferences could impact portfolio quality, risk profiles, and operational continuity.

PT BNI Modal Ventura

BNI Ventures has implemented a number of sustainable finance activities planned for 2025, including:

1. Improving human resource capabilities, particularly related to sustainable finance, through seminars, workshops, and/or training related to sustainable finance, both offline and online, for 18 employees throughout 2025. BNI Ventures has also collaborated with BNI Corporate University and LinkedIn Learning to provide training for employees.

No	Success Indicators	2025 Realization
1	Training Program to improve HR capabilities, especially related to sustainable finance, with an attendance percentage of 50% of its total headcount.	• One employee is currently participating in the Sustainable Investing Certificate program organized by the CFA Institute, with a focus on integrating ESG aspects into the investment decision-making process. • 1 employee is currently participating in the Environmental Social Governance Certificate program organized by Bloomberg for Education, with a focus on investment strategies and trends in ESG. • 6 employees have participated in the Risk Management Certification Body (BSMR) Level 4 and 5 training to hone risk management competencies relevant to industry practices, regulations and good corporate governance. • 8 employees have completed the online training module containing materials on AKHLAK, Anti Fraud, APU PP, Gratification, Risk Culture and GCG.

2. To improve the quality of the work environment and human resources, BNI Ventures implements a series of programs that include aspects of strengthening employee engagement, comfort and suitability of the work environment, and maintaining employee health.

No	Success Indicators	2025 Realization
1	Better workspace air quality compared to outdoor air 30% of total BNI Ventures workdays	In partnership with Nafas, we subscribed to office air purifiers. By September 2025, BNI Ventures' indoor air quality was 71% better than the air outside.
2	30% of the total number of employees do sports once a week.	30% of BNI Ventures employees was enrolled in the fitness membership program attend more than four times a month. The program includes access to daily classes, a fitness room, and Fitness Assessment & Consultation services. Employees who are not enrolled remain active through external activities such as basketball, padel, tennis, yoga, and similar activities.
3	Team building activities must be conducted at least twice a year.	Three team-building activities were held to improve collaboration, engagement, and work-life balance within BNV. These activities included group exercise and communal meals.

3. Participate in social/environmental/ religious/educational activities and implement programs to improve public financial literacy, including those related to sustainable finance, as part of efforts to build corporate awareness.

No	Success Indicators	2025 Realization
1	Natural disaster relief, religious/social/health & education.	Providing assistance to orphans and holding religious studies and breaking the fast together.
2	Participate in activities to improve and preserve the environment	Collaborating with Paperpods, we're donating office paper waste. The paper waste is collected in designated boxes located in the Grha BNI lobby and the BNI Ventures Hall.
3	Implementation of socialization activities, both offline and online, to the community regarding financial literacy, including sustainable finance, at least once a year.	Conducting financial literacy both online and offline, both independently and in collaboration with other parties.

By the end of December 2025, BNI Ventures has implemented resource-saving policies, including:

I. Implementing a paperless policy for a number of internal administrative needs, by optimizing information technology for digital document circulation and signing.
II. Utilizing paper files, taking into account the sensitivity of document content, using both sides of the paper when printing documents, and maximizing the use of laptops for note-taking.
III. Using tumblers and glasses for drinking water in the work environment, using washable and reusable plates and cutlery, and using used shopping bags or cardboard for shopping, thus reducing plastic waste.
IV. Utilizing a paper waste collection program in collaboration with Paperpods, by placing two drop boxes at the Grha BNI Building and Menara BNI, to recycle used paper into plantable paper (recycled paper that can be planted), thus supporting resource savings by reducing the use of new paper and sustainable waste management in the work environment.

V. Energy management is a priority for BNI Ventures in its operational activities, including:
   - Using more energy-efficient LED lighting in the work environment.
   - Layout of the office space with an open office concept to maximize the use of natural sunlight for office lighting from morning to evening, thereby reducing energy consumption.
   - Use of laptops as work devices for all BNI Ventures employees, resulting in greater energy efficiency.
   - Optimization and efficiency in water and electricity use in the work environment.
   - Use of electric and hybrid vehicles for company vehicles and operational vehicles, efficient travel routes and employee mobility, refueling according to the type of fuel required for the vehicle, and driving at standard speeds to minimize fuel use and energy consumption.

BNI Ventures has developed an investment assessment process as part of its strategy to encourage the implementation of sustainable finance. This process includes steps that BNI Ventures will take to integrate sustainable finance as a key evaluation parameter. In addition, BNI Ventures has also analyzed existing Business Partners to assess their contribution to the implementation of sustainable finance principles.

No	Success Indicators	2025 Realization
1	Conduct a review of the Investment, Synergy, and Risk Management SOPs related to the development of the investment assessment process, especially indicators related to Sustainable Finance.	BNV has reviewed the ISMR SOP in Semester I 2025, including adjustments to investment authority tiering and investment, reinvestment, divestment, venture fund management mechanisms, and assessments of asset quality and environmental maintenance aspects by business partners.
2	Strengthening internal processes, including optimizing the investment committee and risk management committee.	The investment documentation and monitoring process has been carried out in accordance with the ISMR SOP and discussion and evaluation of investment risk exposure has been carried out through the BOD level Risk Management Committee twice.

PT BNI Asset Management

BNI Asset Management has implemented a number of sustainable finance activity plans, which were completely implemented by 2025, including:
1. Conducting outreach to all BNI-AM employees through workshops related to the Concept of Sustainable Finance (KKB) and Environmental, Social, and Governance (ESG).
2. Conducting training and certification related to KKB and ESG, including the CertSF (Certification Sustainability for Finance) certification from ACCA.
3. Encouraging BNI-AM employees and clients to invest in ESG-based products through the Champion program related to KKB and ESG. BNI-AM currently has an ESG-based mutual fund product, the BNI AM Sri Kehati Index RD.
4. Reviewing external regulations related to KKB and ESG, including the issuance of IFRS S1 and S2, and participating in training related to S1 and S2 standards from the Indonesian Institute of Accountants.
5. Form a task force team to prepare SOPs and organizations related to KKB and LST.

BNI Securities Pte Ltd

BNI Securities Pte., Ltd. has implemented a number of sustainable finance activities planned for 2025, including:
1. Increasing discussions with customers regarding the issuance of green bonds and other initiatives in the primary market;
2. Increasing the efficiency of non-renewable resources to reduce plastic waste, paper use, and electricity and water consumption; and
3. Internal dissemination of sustainable finance activities, as well as environmental, social, and governance aspects.

ESG Index: BNI Sustainability Practice Summary

ENVIRONMENTAL

COMPANY PRACTICE	PAGE
Environmental Impact Financing	
Scope of management systems to assess ESG risks in financing activities	
• BNI has implemented a management system to assess ESG risk for all loan and investment banking operations. • BNI integrates Environmental, Social, and Governance (ESG) considerations into structured sustainable credit monitoring through the Credit Company Guidelines (PP), which apply to the Corporate, Enterprise, Commercial, Small Medium Enterprise (SME), and Consumer segments in 2025.	Annual Report Page 1225-1227; Sustainability Report Page 73-84
Environmental loan policy	
BNI has developed Risk Acceptance Criteria (RAC) in 23 (twenty-three) industrial sectors for the Corporate and Enterprise segments, 18 (eighteen) industrial sectors for the Commercial segment and 10 (ten) industrial sectors for the Small Medium Enterprise (SME) segment.	Annual Report Page 1227; Sustainability Report Page 73 - 82
BNI participates in the development of a social forestry program, namely the Equator Coffee Trail (BNI JKK), which aims to achieve economic equality, improve the welfare of communities around forests, and prevent illegal logging through the development of coffee commodity agriculture and MSMEs.	Annual Report Page. 1211; Sustainability Report Page 66,69
BNI has established credit policies that define Risk Acceptance Criteria (RAC) as a prerequisite for extending credit to certain industrial sectors. These general credit policies are determined by the Credit Policy Committee, while environmental and social risk assessments are conducted by the Risk and Capital Management Committee. Additionally, evaluations are carried out by the Audit Committee.	Annual Report Page 1225, 1227; Sustainability Report Page 73-82
Integration of ESG Risk Management	
To strengthen oversight of Environmental, Social & Governance (ESG) policymaking and management, BNI established an ESG subcommittee under the Risk Management & Anti-Fraud Committee, chaired by the Deputy President Director and the Director of Risk Management as vice-chair. The Head of the Environmental, Social & Governance Division serves as secretary of the committee (and also serves as a non-voting permanent member).	Annual Report Page 1228; Sustainability Report Page 31-34
BNI has implemented the Climate Risk Stress Test (CRST) as part of its Climate Risk Management System (CRMS), as mandated by the Financial Services Authority (OJK). The CRST will be implemented on 100% of BNI's credit portfolio by 2025. Furthermore, BNI is gradually integrating the TKBI (Indonesian Banking Standards) as a tool to identify the level of alignment of borrower activities with climate change mitigation and adaptation goals.	Annual Report Page. 1225, 1227, 1236; Sustainability Report Page 72,84-87
All BNI staff undergo training on ESG risks and procedures, with legitimate evidence of the ESG training program provided as part of the bank's commitment to capacity building in this critical area.	Annual Report Page 1233; Sustainability Report Page 107-110
ESG Risk Management Supervision	
• Active supervision by the Board of Commissioners and Board of Directors in the implementation of risk management, including the determination of the risk appetite and risk tolerance framework, risk control tools, and the framework and implementation of integrated risk management. • To strengthen supervision in terms of determining Environmental, Social & Governance (ESG) policies and management, BNI has formed an ESG subcommittee in the Risk Management & Anti-Fraud Committee chaired by the Deputy President Director and the Director of Risk Management as deputy chair.	Annual Report Page 1228, 1230; Sustainability Report Page 31-3

COMPANY PRACTICE	PAGE
Through the ESG subcommittee under the Risk Management and Anti-Fraud Committee, the Board of Directors is actively involved in ESG risk management including: • Preparing Environmental, Social, & Governance (ESG) management policies and strategies and their changes; • Identifying potential ESG risks that have an impact on both BNI and BNI stakeholders; • Monitor the implementation of the Sustainable Finance strategy; • Monitor, evaluate, and provide recommendations based on the results of BNI's ESG Assessment; • Evaluate the implementation of the ESG strategy across all BNI business lines; • Coordinate between units to formulate objectives and guidelines for implementing the CSR program; • Mapping and developing BNI's CSR program; • Evaluate the implementation of BNI's CSR program.	Annual Report Page 1229; Sustainability Report Page 33
ESG Risk Management System	
BNI has developed a robust management system to assess ESG risks in financing activities, which are outlined in the form of: • Prospective Sectors • Portfolio Management through Loan Exposure Limits (LEL) • Risk Acceptance Criteria • Implementation of Climate Risk Stress Testing (CRST) • Assessment based on the Indonesian Sustainable Finance Taxonomy (TKBI)	Annual Report Page 1227; Sustainability Report Page 73-84
Sustainable Finance Opportunities	
• As part of its strategic steps to support the green economy, BNI initiated a number of sustainable finance initiatives including Environmentally Aware Business Credit, BNI Environmentally Friendly MSMEs (BUMI), BNI Khatulistiwa Coffee Trail (JKK), BNI Fishery Cultivation Village, Sustainability Linked Loan, and financing to support the energy transition. • Total SLL realization by the end of 2025 reached IDR 6.6 trillion, with nine borrowers representing companies that have experienced changes in sustainability performance according to the indicators set out in this facility. BNI has disbursed SLL financing to borrowers from various business sectors, including agrifood, cement, steel, coal products, and packaging.	Annual Report Page 1228, 1220; Sustainability Report Page 64-69
BNI has a financing portfolio under the Sustainable Business Activities (KKUB) category totaling Rp196.7 trillion (22.3% of the total loan portfolio), primarily in the form of financing for the MSME segment, sustainable natural resource management, energy efficiency, and renewable energy. KUBL financing disbursed in 2025 amounted to Rp78.0 trillion, with a growth target of 101.2% achieved in the RAKB.	Annual Report Page 1218; Sustainability Report Page 62-63

SOCIAL

COMPANY PRACTICE	PAGE
Consumer Financial Protection	
Practice	
BNI always strives to ensure the implementation of fair operational practice policies and in accordance with Bank policies and applicable regulations. In operational practices, BNI guarantees the following: a. Preventing conflicts of interest b. Prohibition on giving & receiving gifts or souvenirs c. Provisions and prohibitions on abuse of office and gratification d. In order to realize Good Corporate Governance, BNI implements a Whistleblowing System (WBS) e. Customer protection policy and provision of Information/Data/Documents to external parties f. Policy on fulfilling creditor rights g. Anti-corruption and anti-fraud policies	-Annual Report Page 1083; Sustainability Report Page 155 (APUPPT) -Annual Report Page 1106; Sustainability Report Page 141 (Protection of Creditors' Rights) -Annual Report Page 1087; Sustainability Report Page 46-48 (Anti-Corruption Policy) -Annual Report Page 1088; Sustainability Report Page 46-48 (Anti-Gratification and Anti-Bribery Policy) -Annual Report Page 1127; Sustainability Report Page 49 (Whistleblowing System) -Annual Report Page 1112; Sustainability Report Page 46 (Conflict of Interest) -Annual Report Page 989; Sustainability Report Page 131(Customer Data Protection Policy)

COMPANY PRACTICE	PAGE
The Board of Directors has high involvement in product supervision through the Product Committee, with duties and responsibilities including: 1. Determining the size and business development strategy through BNI products/activities; 2. Conducting comprehensive testing and deciding on the "feasibility" of new products/ activities, especially related to cross-sectoral/segment alliances and strategic alliances with subsidiaries/other companies outside BNI by inviting the relevant Sector Directors; 3. Monitoring products/activities implemented at BNI and making decisions on their continuation based on recommendations from the working group/product owner; 4. Acting as an arbitration body for cross-sectoral issues related to the performance management system (PMS) in the implementation of new products/activities.	Annual Report Page 929; Sustainability Report Page 146
BNI carries out transparent marketing communications in accordance with OJK provisions and in accordance with the Company's Internal policies.	Annual Report Page 395; Sustainability Report Page 144-145
BNI has an independent settlement system that can provide protection for reporting parties and special training on internal and external protection programs.	Annual Report Page 1128-1129; Sustainability Report Page 49-50
Regarding Debt Collection Policy, BNI has well-defined loan modification options that include income-based considerations and customer access to escalation options.	Annual Report Page 368-370; Sustainability Report Page 142-143
BNI runs BNICorpu TV on YouTube channel to educate the public about financial literacy and current trends in society by presenting speakers from BNI and professional institutions. Education is also carried out through social media and cooperation with various government/ private agencies. In addition, BNI also held a BNI financial literacy campaign offline and online with 44 social campaign contents.	Annual Report Page 1037-1081; Sustainability Report Page 167-170
The BNI Board-level Committee supervises complaints.	Annual Report Page 1128-1129; Sustainability Report Page 139
Human Resource Development	
Practice	
• BNI provides training and competency development across all aspects of the Company's operations in a planned and sustainable manner, upholding equal opportunities for all levels of the organization and across genders. Throughout 2025, BNI held various education and training programs attended by 26,937 employees, equivalent to 99.96% of the total BNI employees. The average training hours per employee were recorded at 146.7 hours/employee. • BNI has a program that covers all employees (including part-time and contract). • Since 2018, BNI has had a mandatory learning program for all employees through Sustainable Finance e-learning to increase awareness and capabilities regarding the practice of integrating environmental, social, and governance (ESG) criteria into financial services to realize sustainable development outcomes, including mitigation and adaptation to the negative impacts of climate change.	Annual Report Page 168-179; Sustainability Report Page 100-110
Strategy	
BNI has a Whistleblowing System (WBS) called "WBS to CEO", which is one of the early detection mechanisms for violations in BNI that can cause financial losses including things that can damage BNI's image. WBS management is carried out through collaboration with external parties, namely Deloitte.	Annual Report Page 1127; Sustainability Report Page 49
BNI conducted an employee satisfaction survey alongside employee engagement. BNI recorded an employee engagement score of 35% in 2025, categorized as "Good," indicating employee engagement with BNI	Annual Report Page 1220; Sustainability Report Page 120

COMPANY PRACTICE	PAGE
Talent Development Strategy	
The workforce planning strategy is aimed at ensuring the availability of employees in functions that are aligned with BNI's strategy. Recruitment is carried out through various programs including the Officer Development Program, Assistant Development Program and Experience Hire. In addition to the Bina internship program, BNI also offers internship programs for university students, including the Talented Generation Internship (MAGENTA) program run by the Ministry of State-Owned Enterprises and the MagangHub program in collaboration with the Ministry of Manpower. BNI organizes the Bina BNI Internship Program which aims to provide training and job guidance to the inexperienced workforce by providing the knowledge, skills, and abilities needed to be able to compete in the world of work. Bina BNI internship participants in 2025 will be spread across all BNI operational areas. In order to provide learning solutions for employees, BNI Corporate University has provided various learning facilities and infrastructure that are arranged both in-house and in partnership with educational institutions.	Annual Report Page 441, 446; Sustainability Report Page 95-97
Programs & Initiatives	
BNI has designed a stock ownership program for employees and management of the Company. BNI has an Employee Stock Allocation (ESA) program, a stock-ownership-based incentive program that will run in stages from 2022 to 2025. It will cover 90% of BNI employees who meet certain criteria and requirements as stipulated in the Program Implementation Guidelines. Additionally, other programs include the Performance Stock Bonus Program and the Management Stock Ownership Program (MSOP).	Annual Report Page 1118-1122; Sustainability Report Page 116
The remuneration strategy covers all employees, which is determined based on the principles of supply and demand, BNI's remuneration position compared to the market, and considering employee talent classification. The employee remuneration components consist of fixed remuneration which is differentiated based on job weight and person value, while variable remuneration is given based on performance that is linked to the achievement of bank performance, unit performance and the performance of the employee concerned.	
BNI provides training and competency development at all levels in the Company which is carried out in a planned and sustainable manner by upholding the provision of equal opportunities, and is adjusted to the training and development needs at each level.	Annual Report Page 168-179; Sustainability Report Page 101-112
Throughout 2025, BNI's education and training costs reached Rp192.9 billion, a 4.08% decrease compared to 2024.This decrease was due to increased effectiveness in learning delivery, including the internalization of Self-Directed Learning that utilizes various digital learning platforms.	
Access to Finance	
Products and Strategies	
BNI is a direct provider or is directly involved in providing services in Micro/Microinsurance services.	Annual Report Page 1209-1210; Sustainability Report Page 163-167
Distribution and Reach	
In supporting customer convenience in conducting banking transaction activities, BNI offers various e-Banking facilities that are constantly being improved through various developments and innovations.	Annual Report Page 494-502; Sustainability Report Page 162-165
In order to expand its reach, BNI has 217,013 Agen46 with 28,177 Agents or around 13% located in the 3T BNI Agen46 area which is BNI's partner in providing banking services to the community in the context of financial inclusion. Agen46 can facilitate various banking services to help distribute government programs, such as the distribution of social assistance and subsidies.	Annual Report Page 5, 72, 309 1220; Sustainability Report Page 163 – 165
Leading innovation in alternative branchless distribution channels targeting underserved demographics through Digital and Agen46 services.	Annual Report Page 494-502; Sustainability Report Page 163-165

COMPANY PRACTICE	PAGE
Privacy & Data Security	
Practice - Operational	
• BNI guarantees that customers can update data, change, access and update data changes through BNICall and Customer Service. • BNI has a data protection and information security policy that regulates all related business lines/subsidiaries. • BNI has a personal data protection management framework that is in line with laws and regulations, including but not limited to Law No. 27 of 2022 concerning Personal Data Protection, POJK No. 22 of 2023 concerning Consumer and Community Protection in the Financial Services Sector, and provisions related to Bank Indonesia consumer protection.	Annual Report Page 1111; Sustainability Report Page 124-136
BNI launched an innovation in applying for credit cards and other consumer credit through e-forms, as well as opening digital accounts through mobile banking to reduce the potential for misuse of customer data, because data is directly stored in the system without going through physical forms.	Annual Report Page 494-502; Sustainability Report Page 147-148
BNI established a dedicated organization, the Chief Information Security Officer (CISO) Division, which combines several units with information security-related functions to maintain independence and focus more on evaluating, implementing, monitoring, and improving cybersecurity. BNI has a multi-layered structure for managing privacy, cybersecurity, and data protection.	Annual Report Page 487-493; Sustainability Report Page 126
BNI continues to develop digital banking services to make it easier for customers, while facing the challenges of data security and privacy protection from cybercrime threats. BNI is committed to managing this risk and protecting human rights.	Annual Report Page hal. 483-484; Sustainability Report Page 124-136
BNI also strengthens technology, digital innovation, and data security systems, and complies with customer privacy protection regulations, such as OJK regulations and the Personal Data Protection Law.	Annual Report Page 487-488; Sustainability Report Page 124-136
To ensure the reliability of the system and information security, technology audits are carried out periodically by the internal audit unit. Assessments from external parties include those carried out by the National Cyber and Crypto Agency (BSSN) through the Information Security Index (Indeks KAMI).	Annual Report Page 491-492; Sustainability Report Page 133-136
The Technology Management Committee is one of the permanent committees at BNI that has the authority to provide recommendations to the Board of Directors regarding the formulation, determination of policies and strategies for developing BNI's information technology. This committee was formed with the aim of assisting the Board of Commissioners and Board of Directors in carrying out supervision of Information Technology (IT) activities, including those related to cyber security.	Annual Report Page 936 Sustainability Report Page 477
Practice - Employees	
BNI provides employees in the IT Work Unit with various training to develop soft skills and hard skills. Hard skill provision is carried out through project management training, IT architecture, programming, CI/CD, secure coding, cloud security, and so on, which are carried out in-house or through Linkedin Learning, Google and AWS training, and other training media. For all employees, awareness of data security and/or privacy-related risks and procedures is also raised through training and digital mindset development.	Annual Report Page 476-78, 491 Sustainability Report Page 136

GOVERNANCE

COMPANY PRACTICE	PAGE
Governance	
Governance	
Salary Figures Executive Pay Disclosure	Sustainability Report Page 822-826
Ownership Structure • Controlling Shareholders • Controlling Shareholders to Watch Out For	Annual Report Page 187
One Share One Vote • Multiple Equity Classes with Different Voting Rights • Government Intervention to Watch Out For	Annual Report Page 679

COMPANY PRACTICE	PAGE
Board of Directors	
BOARD OF DIRECTORS INDEPENDENCE • Executive Officers in the Board of Directors • Transactions with Related Parties	Annual Report Page 120-132, 416-421
BOARD OF DIRECTORS EXPERTISE & DIVERSITY There are 3 (three) female members of the Board of Directors out of a total of 13 (thirteen) members of the Board of Directors.	Annual Report Page 827-829
Salary	
PAYMENT FIGURES Executive Officer Pay Disclosure	Annual Report Page 822-826
PAYMENT • CEO Equity Policy • Clawback & Malus • Sustainability-Linked Pay	Annual Report Page 822-826 Sustainability Report Page 59
Shareholding & Controllers	
DIRECTOR ELECTION • Annual Director Election • Proxy Acces	Annual Report Page 747-748
ONE SHARE ONE VOTE • Multiple Equity Classes with Different Voting Rights	Annual Report Page 679
SHAREHOLDER RIGHTS • Right to Speak on Pay Policy	Annual Report Page 674
Accounting	
ACCOUNTING RISK Expenses Recognition	Annual Report Page 345-347; Sustainability Report Page 59
Business Ethics	
Business Ethics Policy & Practice	
BNI has a Board of Directors or C-suite committee or executive committee that oversees ethical issues.	Annual Report Page 926-930; Sustainability Report Page 44
BNI has a detailed formal policy on bribery and anti-corruption.	Annual Report Page 1087-1091; Sustainability Report Page 46 -48
BNI conducts an audit of all operations at least once every three years.	Annual Report Page 218-219; Sustainability Report Page 13
BNI has a formal anonymous whistleblower system with legal protection for whistleblowers through the Whistleblowing System (WBS) managed with an external party, Deloitte.	Annual Report Page 1127-1130; Sustainability Report Page 49
BNI has a standard ethics training programme covering all employees (including part-time employees) and contractors.	Annual Report Page 1087-1089; Sustainability Report Page 45
All BNI suppliers are required to have an anti-corruption policy and programme for compliance verification.	Annual Report Page 1087; Sustainability Report Page 154
BNI has an Anti-Money Laundering Policy. Policy and implementation strategy explained.	Annual Report Page 1083; Sustainability Report Page 155
Tax Transparency	
The implementation of tax transparency has referred to the regulations or policies of the Government.	Annual Report Page 1082; Sustainability Report Page. 60



10

FINANCIAL STATEMENTS



PT BANK NEGARA INDONESIA (PERSERO) Tbk DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN KEUANGAN KONSOLIDASIAN/
CONSOLIDATED FINANCIAL STATEMENTS

31 DESEMBER 2025 DAN 2024/
31 DECEMBER 2025 AND 2024

Direksi

PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK

SURAT PERNYATAAN DIREKSI
TENTANG TANGGUNG JAWAB ATAS
LAPORAN KEUANGAN KONSOLIDASIAN
PADA TANGGAL 31 DESEMBER 2025 DAN 2024
SERTA UNTUK TAHUN YANG BERAKHIR
31 DESEMBER 2025 DAN 2024

No. DIR/ 104

Kami yang bertanda tangan di bawah ini:

1. Nama : Putrama Wahju Setyawan
   Alamat Kantor : Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia
   Alamat Domisili : Taman Century 2 Blok M No.32, RT/RW 003/023 Kel Pekayon Jaya, Kec Bekasi Selatan, Bekasi
   Nomor Telepon : 021- 2511946
   Jabatan : Direktur Utama

2. Nama : Hussein Paolo Kartadjoemena
   Alamat Kantor : Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia
   Alamat Domisili : Kav. Polri No.D/24, RT.011/RW.007, Kel/Desa Rogunan, Kecamatan Pasar Minggu
   Nomor Telepon : 021- 5728910
   Jabatan : Direktur *Finance & Strategy*

menyatakan bahwa:

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak,
2. Laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia,
3. a. Semua informasi dalam laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak telah dimuat secara lengkap dan benar;
   b. Laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material,
4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Negara Indonesia (Persero) Tbk dan Entitas Anak

Demikian pernyataan ini dibuat dengan sebenarnya.

PT BANK NEGARA INDONESIA (PERSERO) Tbk
AND SUBSIDIARIES

DIRECTORS' STATEMENT
REGARDING THE RESPONSIBILITY FOR
THE CONSOLIDATED FINANCIAL STATEMENTS
AS OF 31 DECEMBER 2025 AND 2024
AND FOR THE YEARS ENDED
31 DECEMBER 2025 AND 2024

No. DIR/ 104

We, the undersigned,

1. *Name* : *Putrama Wahju Setyawan*
   Office address : *Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia*
   Residential Address : *Taman Century 2 Blok M No.32, RT/RW 003/023 Kel Pekayon Jaya, Kec Bekasi Selatan, Bekasi*
   Telephone : *021- 2511946*
   Title : *President Director*

2. *Name* : *Hussein Paolo Kartadjoemena*
   Office Address : *Jl. Jenderal Sudirman Kav. 1, Jakarta 10220, Indonesia*
   Residential Address : *Kav. Polri No.D/24, RT.011/RW.007, Kel/Desa Rogunan, Kecamatan Pasar Minggu*
   Telephone : *021- 5728910*
   Title : *Finance & Strategy Director*

declare that,

1. *We are responsible for the preparation and the presentation of PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements;*
2. *PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards,*
3. *a. All information in the PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' consolidated financial statements have been disclosed in a complete and truthful manner,*
   b. PT Bank Negara Indonesia (Persero) Tbk and subsidiaries' consolidated financial statements do not contain any incorrect information or material facts, nor do they omit material information or material facts,
4. *We are responsible for PT Bank Negara Indonesia (Persero) Tbk and Subsidiaries' internal control system.*

Thus this statement is made truthfully.

Atas nama dan mewakili Direksi/*For and on behalf of the Directors*

Jakarta, 02 FEB 2026

Putrama Wahju Setyawan
Direktur Utama/
President Director

METERAI TEMPEL

Hussein Paolo Kartadjoemena
Direktur *Finance & Strategy*/
Finance & Strategy Director

PT Bank Negara Indonesia (Persero) Tbk
Kantor Pusat
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pwc

LAPORAN AUDITOR INDEPENDEN KEPADA PARA PEMEGANG SAHAM, DEWAN KOMISARIS, DAN DIREKSI

INDEPENDENT AUDITORS' REPORT TO THE SHAREHOLDERS, BOARD OF COMMISSIONERS AND DIRECTORS

PT BANK NEGARA INDONESIA (PERSERO) TBK

Opini

Kami telah mengaudit laporan keuangan konsolidasian PT Bank Negara Indonesia (Persero) Tbk dan entitas anaknya ("Grup"), yang terdiri dari laporan posisi keuangan konsolidasian tanggal 31 Desember 2025, 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 2025, serta kinerja keuangan konsolidasian dan arus kas konsolidasiannya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan Indonesia.

Opinion

We have audited the consolidated financial statements of PT Bank Negara Indonesia (Persero) Tbk and its subsidiaries (the "Group"), which comprise the consolidated statement of financial position as at 31 December 2025, and the consolidated statement of profit or 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 31 December 2025, and its consolidated financial performance and its consolidated cash flows for the year then ended, in accordance with Indonesian Financial Accounting Standards.

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.

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.

Key audit matters

Key audit matters are those matters that, in our professional judgement, 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.

Kantor Akuntan Publik Rintis, Jumadi, Rianto & Rekan
WTC 3, Jl. Jend. Sudirman Kav. 29-31, Jakarta 12920 – Indonesia
T: +62 (21) 5099 2901 / 3119 2901, F: +62 (21) 5290 5555 / 5290 5050, www.pwc.com/id

Nomor Izin Usaha: KEP-315/KM.1/2024

00030/2.1457/AU.1/07/1124-2/1/II/2026

Hal audit utama yang teridentifikasi dalam audit kami diuraikan sebagai berikut.

1. **Kerugian kredit ekspektasian ("KKE") - cadangan kerugian penurunan nilai atas pinjaman yang diberikan**

   Seperti yang dijelaskan dalam Catatan 12 atas laporan keuangan konsolidasian, pada tanggal 31 Desember 2025, cadangan kerugian penurunan nilai atas pinjaman yang diberikan Grup adalah sebesar Rp 35.860.626 juta.

   Cadangan kerugian penurunan nilai atas pinjaman yang diberikan ditentukan oleh Grup berdasarkan kerangka KKE sesuai dengan PSAK 109: "Instrumen Keuangan", seperti yang dijelaskan dalam Catatan 2c.(x) atas laporan keuangan konsolidasian.

   Kami memberikan fokus pada area ini karena nilai tercatat atas pinjaman yang diberikan mewakili 66% dari total aset Grup pada tanggal 31 Desember 2025 dan besarnya nilai cadangan kerugian penurunan nilai yang dibentuk atas pinjaman tersebut nilainya signifikan terhadap laporan keuangan konsolidasian Grup. Lebih lanjut, perhitungan cadangan kerugian penurunan nilai melibatkan pertimbangan manajemen yang subjektif dan penggunaan estimasi dengan tingkat ketidakpastian yang tinggi.

   Untuk pinjaman yang diberikan dimana Grup menghitung KKE secara individual, Grup menggunakan estimasi arus kas ekspektasian dari pinjaman yang diberikan. Hal ini membutuhkan pertimbangan signifikan dalam mengestimasi probabilitas rata-rata tertimbang kerugian kredit, serta estimasi waktu dan jumlah pembayaran dari pinjaman yang diberikan.

   Untuk pinjaman yang diberikan dimana Grup menghitung KKE secara kolektif, Grup menggunakan model KKE dengan beberapa asumsi utama, antara lain, probabilitas rata-rata tertimbang dari *probability of default*, *loss given default* dan *exposure at default*, setelah memperhitungkan faktor perkiraan masa depan dan informasi eksternal lainnya termasuk proses identifikasi atas pinjaman yang diberikan yang mengalami peningkatan risiko kredit secara signifikan.

The key audit matters identified in our audit are outlined as follows.

1. ***Expected credit losses ("ECL") - allowance for impairment losses of loans***

   As described in Note 12 to the consolidated financial statements, as at 31 December 2025, the allowance for impairment losses of loans of the Group was IDR 35,860,626 million.

   The allowance for impairment losses of loans was determined by the Group based on the ECL framework under SFAS 109: "Financial Instruments", as described in Note 2c.(x) to the consolidated financial statements.

   We focused on this area as the carrying value of loans represented 66% of the total assets of the Group as at 31 December 2025 and the allowance for impairment losses provided against the loans was significant to the Group's consolidated financial statements. Furthermore, the calculation of the allowance for impairment losses involved subjective management judgement and was subject to a high degree of estimation uncertainty.

   For loans where the Group assessed ECL individually, the Group used the estimated cash flows which are expected to be obtained from the loans. This required significant judgement in estimating the weighted average probability of credit losses, and the timing and amount of the repayments of the loans.

   For loans where the Group assessed ECL collectively, the Group used an ECL model that incorporated key assumptions, such as, the weighted average probability of default, loss given default and exposure at default, after considering forward looking factors and other external information including the identification process over loans that had experienced a significant increase in credit risk.

Bagaimana audit kami merespons hal audit utama

Kami melakukan prosedur-prosedur audit berikut untuk merespons hal audit utama ini:

- Kami memperoleh pemahaman atas pendekatan Grup dalam mengidentifikasi aset keuangan yang mengalami peningkatan risiko kredit secara signifikan atau bukti objektif penurunan nilai, dan melakukan pengujian atas pengendalian yang relevan atas proses penetapan *rating* internal berdasarkan uji petik.
- Kami menguji keakurasian dari klasifikasi kualitas pinjaman yang diberikan berdasarkan uji petik dengan menelaah dokumen kredit dari debitur-debitur yang menjadi sampel.
- Kami menilai metodologi dan menguji asumsi pemodelan signifikan yang digunakan dalam model KKE, dengan bantuan pakar pemodelan kredit kami. Kami menguji *probability of default*, *loss given default* dan *exposure at default*, yang mencakup (i) evaluasi perkiraan makroekonomi Indonesia dengan membandingkan perkiraan dengan informasi yang tersedia untuk umum tentang prospek makroekonomi Indonesia; dan (ii) menguji kelengkapan dan keakuratan data yang digunakan dalam model dengan data aktual yang tersedia di Grup dengan melibatkan spesialis Teknologi Informasi ("TI") kami.
- Ketika bukti objektif penurunan nilai diidentifikasi oleh Grup dan kerugian penurunan nilai dihitung secara individual, kami menguji, berdasarkan uji petik, kecukupan cadangan kerugian penurunan nilai yang disiapkan oleh manajemen dengan membandingkan baik jumlah dan waktu dari arus kas masa depan yang digunakan oleh Grup dalam perhitungan kerugian penurunan nilai dengan jadwal pembayaran kembali yang tercantum dalam perjanjian pinjaman yang diberikan dan menguji probabilitas rata-rata tertimbang yang digunakan dalam menyusun arus kas.
- Kami melakukan perhitungan ulang untuk KKE yang dinilai secara kolektif dan menguji akurasi perhitungan KKE yang dinilai secara individual berdasarkan uji petik.

How our audit addressed the key audit matter

We performed the following audit procedures to address this key audit matter:

- *We understood the Group's approach over the identification of financial assets that have experienced a significant increase in credit risk or objective evidence of impairment and tested the relevant controls over the internal rating process on a sample basis.*
- *We tested the accuracy of the credit quality classification of a sample of loans by reviewing the credit files of those sampled debtors.*
- *We assessed the methodologies applied and tested the significant modelling assumptions used in the ECL models, with the assistance from our credit modelling expert. We tested the probability of default, loss given default and exposure at default, which included (i) evaluating the forecasts of Indonesia macroeconomics by comparing forecasts with publicly available information on the Indonesia macroeconomic outlook; and (ii) testing the completeness and accuracy of data used in the model with the actual data available within the Group by involving our Information Technology ("IT") specialists.*
- *When objective evidence of impairment was identified by the Group and impairment losses were individually calculated, we tested, on a sample basis, the adequacy of the allowance for impairment losses determined by management by comparing the quantum and timing of future cash flows used by the Group in the impairment loss calculation with the repayment schedule in the loan agreement and tested the probability-weighted outcomes used in preparing the cash flows.*
- *We recalculated the collective ECL and tested the accuracy of the individual ECL calculation on a sample basis.*

pwc

2. Penilaian dari Liabilitas Kontrak Asuransi dan dampak penerapan pertama kali PSAK 117 "Kontrak Asuransi"

Pada tanggal 1 Januari 2025, Grup menerapkan PSAK 117 "Kontrak Asuransi", yang menggantikan standar sebelumnya, PSAK 104. PSAK 117 menetapkan prinsip untuk pengakuan, pengukuran, penyajian, dan pengungkapan kontrak asuransi.

Dampak kumulatif dari penerapan awal PSAK 117 pada tanggal transisi 1 Januari 2024 sebesar Rp 769.274 juta telah diakui dalam saldo awal ekuitas Grup pada tanggal 1 Januari 2024.

Manajemen menerapkan pertimbangan untuk menentukan penggunaan pendekatan retrospektif penuh dan nilai wajar dalam penerapan awal standar tersebut.

Seperti yang dijelaskan dalam Catatan 28 atas laporan keuangan konsolidasian, pada tanggal 31 Desember 2025, liabilitas kontrak asuransi Grup adalah sebesar Rp 22.381.021 juta.

Penilaian manajemen atas liabilitas kontrak asuransi ini melibatkan pertimbangan signifikan terkait ketidakpastian hasil masa depan, termasuk pengembangan asumsi dan metodologi aktuaria utama. Asumsi-asumsi ini dimasukkan dalam perhitungan arus kas pemenuhan dan margin jasa kontraktual.

Arus kas pemenuhan, yang mencakup semua arus kas masuk dan arus kas keluar yang langsung terkait dengan kontrak, ditentukan menggunakan asumsi pada tanggal penilaian yang mengandung ketidakpastian yang signifikan dalam estimasi arus kas yang diharapkan.

Margin jasa kontraktual mewakili keuntungan yang belum diterima yang akan diakui Grup seiring dengan pemberian jasa kontrak asuransi di masa depan. Amortisasi margin jasa kontraktual untuk suatu kelompok kontrak diakui sebagai pendapatan jasa asuransi dalam laporan laba rugi konsolidasian berdasarkan jumlah unit pertanggungan yang diberikan selama periode tersebut. Unit pertanggungan ditentukan oleh besarnya manfaat yang diberikan dalam suatu kontrak dan durasi perlindungan yang diharapkan. Manajemen menggunakan pertimbangan dalam mengidentifikasi layanan yang diberikan dan menentukan unit pertanggungan.

2. Valuation of Insurance Contract Liabilities and impact of the first-time application of SFAS 117 "Insurance Contracts"

On 1 January 2025, the Group adopted SFAS 117 "Insurance Contracts," which replaces the previous standard, SFAS 104. SFAS 117 establishes principles for the recognition, measurement, presentation, and disclosure of insurance contracts.

The cumulative effect of the initial application of SFAS 117 on the transition date 1 January 2024 amounting to IDR 769,274 million has been recognised in the Group's opening equity balance as at 1 January 2024.

Management applied judgments to determine the use of full retrospective and fair value approaches in the initial application of the standard.

As described in Note 28 to the consolidated financial statements, as at 31 December 2025, the insurance contract liabilities of the Group was IDR 22,381,021 million.

Management's valuation of the insurance contract liabilities involves significant judgment about uncertain future outcomes, including the development of key actuarial assumptions and methodologies. These assumptions are incorporated within the fulfilment cash flows and contractual service margin calculations.

Fulfilment cash flows, which include all cash inflows and cash outflows directly attributable to the contract, are determined using assumptions as at the valuation date, which are subject to significant uncertainty in the estimation of expected cash flows.

Contractual service margin represents the unearned profit that the Group will recognise as it provides insurance contract services in the future. The amortisation of the contractual service margin for a group of contracts is recognised as insurance service revenue in the consolidated statement of profit or loss, based on the number of coverage units provided during the period. Coverage units are determined by the quantity of benefits provided under a contract and its expected coverage duration. Management applied judgment in identifying the services provided and determining the coverage units.

Bagaimana audit kami merespons hal audit utama

Kami melakukan prosedur-prosedur audit berikut untuk merespons hal audit utama ini:

- Kami memperoleh pemahaman atas proses pemilihan kebijakan akuntansi, penentuan metodologi dan asumsi yang digunakan dalam perhitungan liabilitas kontrak asuransi. Kamu juga menilai pendekatan transisi serta metodologi pengukuran yang dipilih oleh manajemen dengan menguji kelayakan kontrak asuransi yang diukur berdasarkan nilai wajar pada tanggal transisi, serta menguji kelayakan kontrak asuransi yang diukur menggunakan *variabel fee approach* dan *premium allocation approach*.
- Kami mengevaluasi kompetensi, kapabilitas, dan objektivitas tenaga ahli aktuaria manajemen.
- Kami menguji desain dan efektivitas pengendalian internal atas akurasi dan kelengkapan data polis asuransi yang digunakan untuk pemenuhan arus kas.
- Kami menguji, berdasarkan uji petik, akurasi data kontrak asuransi dengan memeriksa data ke dokumen pendukung seperti polis, dokumen klaim, dan arus kas aktual.
- Menguji kelengkapan data yang digunakan dalam perhitungan liabilitas kontrak asuransi dengan melakukan rekonsiliasi antara data polis *in-force* dan data yang diolah oleh tenaga ahli aktuaria manajemen menggunakan *Computer Assisted Audit Technique* ("CAATs") dengan bantuan spesialis IT kami.
- Kami menilai, berdasarkan uji petik, asumsi utama yang digunakan manajemen dan membandingkannya terhadap pengalaman historis Grup dan dengan data yang dapat diamati. Pengujian kami melibatkan penggunaan ahli aktuaria kami.
- Kami menilai kesesuaian metodologi yang digunakan dalam penilaian liabilitas kontrak asuransi dan berdasarkan uji petik, menguji ketepatan perhitungan yang terkait dengan arus kas pemenuhan, margin jasa kontraktual, beserta penerapannya dalam model aktuaria, dengan melibatkan ahli aktuaria kami.

How our audit addressed the key audit matter

We performed the following audit procedures to address this key audit matter:

- *We understood the process of the selection of accounting policies, determination of methodologies and assumptions used in the calculation of the insurance contract liabilities. We also assessed the transition approach and measurement methodology selected by management by testing the eligibility of insurance contract measured at fair value at the transition date, as well as the eligibility of insurance contracts measured using the variable fee approach and the premium allocation approach.*
- *We evaluated the competence, capabilities and objectivity of the management's actuarial expert.*
- *We tested the design and operating effectiveness of controls over the accuracy and completeness of the insurance policies data used for the fulfilment cash flow.*
- *We tested, on a sample basis, the accuracy of the insurance contract data by inspecting supporting documents such as policies, claim documents, and actual cash flows.*
- *We tested the completeness of the data used in calculating insurance contract liabilities by performing a reconciliation between in-force policy data and data processed by management's actuarial expert using Computer Assisted Audit Techniques ("CAATs"), with assistance from our IT specialists.*
- *We assessed, on a sample basis, the key assumptions used by management and by comparing them to the Group's historical experience and observable data. Our testing involved the use of our actuarial experts.*
- *We assessed the appropriateness of the methodologies used in the valuation of insurance contract liabilities and, on a sample basis, tested the accuracy of calculations related to fulfilment cash flows, contractual service margin, along with their application in the actuarial model, by involving our actuarial experts.*

- Kami menilai, berdasarkan uji petik, kesesuaian penentuan unit pertanggungan oleh manajemen dengan jenis manfaat yang diidentifikasi, dengan melibatkan ahli aktuaria kami.
- Kami menguji analisis pergerakan liabilitas kontrak asuransi tahun berjalan dengan menilai apakah pergerakan tersebut sesuai dengan asumsi manajemen, dengan melibatkan ahli aktuaria kami.
- Kami menilai kecukupan pengungkapan Grup dalam laporan keuangan konsolidasian terhadap persyaratan Standar Akuntansi Keuangan Indonesia.

- *We assessed, on a sample basis, the appropriateness of management's determination of coverage units with the types of benefits identified, by involving our actuarial experts.*
- *We tested the analysis of movement of insurance contract liabilities during the year by assessing whether the changes align with the management's assumptions, with the assistance of our actuarial experts.*
- *We assessed the adequacy of the Group's disclosure in the consolidated financial statements against the requirements of the Indonesian Financial Accounting Standard.*

3. **Sistem dan pengendalian Teknologi Informasi ("TI") yang berdampak pada pelaporan keuangan**

Grup sangat bergantung pada infrastruktur, sistem, dan pengendalian TI untuk mendukung kegiatan operasional sehari-hari dan proses pelaporan keuangan. Lingkungan TI Grup dianggap kompleks dengan mempertimbangkan jumlah dan kompleksitas dari sistem utama pelaporan keuangan dan antarmuka sistem. Oleh karena itu, kami menganggap pengoperasian pengendalian teknologi informasi Grup sebagai hal audit utama.

Bagaimana audit kami merespons hal audit utama

Kami melakukan prosedur-prosedur audit berikut untuk merespons hal audit utama ini:

- Kami melibatkan spesialis TI untuk mengevaluasi risiko yang terkait dengan lingkungan TI Grup, sehubungan dengan proses pelaporan keuangan.
- Kami memperoleh pemahaman tentang sistem TI dan pengendalian yang mendukung proses pelaporan keuangan dan menilai efektivitas rancangan, implementasi dan pengoperasian dari pengendalian utama yang dirancang untuk mempertahankan integritas dari sistem utama pelaporan keuangan. Penilaian ini termasuk evaluasi atas:
    i. Pengendalian atas manajemen perubahan: Proses dan pengendalian yang dijalankan untuk mengembangkan, menguji dan mengesahkan perubahan pada fungsi dan konfigurasi di dalam sistem;

3. ***Information Technology ("IT") systems and controls that impact financial reporting***

The Group is heavily reliant on its IT infrastructure, systems and controls for its daily operations and financial reporting processes. The IT environment of the Group is considered to be complex due to the number and complexity of the key financial reporting systems and their system interfaces. Therefore, we consider the operation of the Group's information technology controls to be a key audit matter.

How our audit addressed the key audit matter

We performed the following audit procedures to address this key audit matter:

- *We involved IT specialists in evaluating the risks associated with the Group's IT environment in respect of its financial reporting processes.*
- *We understood the IT systems and controls that support the financial reporting process and assessed the effectiveness of the design, implementation and operation of the associated key controls designed to maintain the integrity of the key financial reporting systems. This assessment included evaluating:*
    i. Change management controls: The processes and controls to develop, test and authorise changes to the functionality and configurations within systems;

ii. Pengendalian atas keamanan akses: Pengendalian akses pengguna dirancang untuk melaksanakan pemisahan tugas, mengatur penggunaan akun umum dan akses istimewa atau proses otorisasi atas perubahan data;

iii. Pengendalian atas operasional TI: Pengendalian atas operasional dilaksanakan untuk mengelola risiko keuangan yang mungkin akan terjadi dari setiap masalah operasional TI; dan

iv. Pengendalian pengembangan sistem: Pengendalian atas pengembangan, konfigurasi dan implementasi dari sistem baru atau yang sudah ada.

- Kami menguji pengendalian TI Grup atas sistem yang relevan dengan audit kami dan pengendalian utama yang bergantung pada TI yang mendukung proses pelaporan keuangan, seperti penghitungan otomatis sistem, pemrosesan transaksi, pembuatan laporan dan perpindahan data antar sistem. Pengujian kami mencakup pemeriksaan konfigurasi sistem yang relevan dan pengujian keluaran sistem, berdasarkan uji petik.

ii. Access security controls: The access controls designed to enforce segregation of duties, govern the use of generic and high privileged accounts or the authorisation process to change the data;

iii. IT operation related controls: The controls over operations to manage the financial risks that may arise from any IT operation issues; and

iv. System development controls: The controls associated with developing, configuring, and implementing new or existing systems.

- *We tested the Group's IT controls over systems that were relevant to our audit and the key IT dependent controls supporting the financial reporting process, such as the automated system calculations, transaction processing, generation of reports and data interfaces between systems. Our testing included the inspection of relevant system configurations and testing system outputs, on a sample basis.*

Informasi lain

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam laporan tahunan, tetapi tidak termasuk laporan keuangan konsolidasian dan laporan auditor kami. Laporan tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor ini.

Opini kami atas laporan keuangan konsolidasian tidak mencakup informasi lain, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas informasi lain tersebut.

Sehubungan dengan audit kami atas laporan keuangan konsolidasian, tanggung jawab kami adalah untuk membaca informasi lain yang teridentifikasi di atas ketika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah informasi lain mengandung inkonsistensi material dengan laporan keuangan konsolidasian atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

Other information

Management is responsible for the other information. The other information comprises the information included in the annual report 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 consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the consolidated 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 terhadap Laporan Keuangan Konsolidasian

Responsibilities of Management and Those Charged with Governance for the Consolidated Financial Statements

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan konsolidasian tersebut sesuai dengan Standar Akuntansi Keuangan Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan konsolidasian yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

Dalam penyusunan laporan keuangan konsolidasian, 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 consolidated 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

Auditors' responsibilities for the audit of the consolidated financial statements

Tujuan kami adalah untuk memperoleh 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.

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 konsolidasian, 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 efektivitas 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 konsolidasian 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 judgement and maintain professional scepticism throughout the audit. We also:

- *Identify and assess the risks of material misstatement of the consolidated 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 consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.*

- Merencanakan dan melaksanakan audit grup untuk memperoleh bukti audit yang cukup dan tepat terkait informasi keuangan entitas atau unit bisnis dalam Grup sebagai basis untuk merumuskan opini atas laporan keuangan grup. Kami bertanggung jawab atas arahan, supervisi, dan penelaahan atas pelaksanaan pekerjaan audit untuk tujuan audit grup. Kami tetap bertanggung jawab sepenuhnya atas opini audit kami.

- *Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the group financial statements. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.*

Kami mengomunikasikan kepada pihak yang bertanggung jawab atas tata kelola mengenai, antara lain, ruang lingkup dan saat yang direncanakan atas audit, serta temuan audit signifikan, termasuk setiap defisiensi signifikan dalam pengendalian internal yang teridentifikasi oleh kami selama audit.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

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, langkah yang diambil untuk menghilangkan ancaman atau pengamanan yang diterapkan.

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, actions taken to eliminate threats or safeguards applied.

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 konsolidasian 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.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated 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.

JAKARTA,
2 Februari/*February* 2026

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Bank Negara Indonesia (Persero) Tbk
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PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN KEUANGAN KONSOLIDASIAN
31 DESEMBER 2025 DAN 2024
DAN UNTUK TAHUN-TAHUN YANG BERAKHIR PADA
31 DESEMBER 2025 DAN 2024

CONSOLIDATED FINANCIAL STATEMENTS
31 DECEMBER 2025 AND 2024
AND FOR THE YEARS THEN ENDED
31 DECEMBER 2025 AND 2024

Daftar Isi

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LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember/ *December* 2025	31 Desember/ *December* 2024*)	1 Januari/ *January* 2024*)	
ASET					***ASSETS***
Kas	2c, 2e, 4	13,352,065	13,709,930	11,207,201	*Cash*
Giro pada Bank Indonesia	2c,2e,2f,5	79,989,122	51,669,054	65,256,432	*Current accounts with Bank Indonesia*
Giro pada bank lain	2c,2e,2f,6				*Current accounts with other banks*
- Pihak berelasi	2ac,46b	79,999	42,974	52,254	*Related parties* -
- Pihak ketiga		25,858,094	22,031,212	34,970,515	*Third parties* -
Total giro pada bank lain		25,938,093	22,074,186	35,022,769	*Total current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai		(7)	(13)	(7)	*Less: Allowance for impairment losses*
		25,938,086	22,074,173	35,022,762	
Penempatan pada bank lain dan Bank Indonesia	2c,2e,2g,7				*Placements with other banks and Bank Indonesia*
- Pihak berelasi	2ac,46c	2,054,144	1,620,191	1,210,621	*Related parties* -
- Pihak ketiga		31,725,849	15,455,444	42,583,643	*Third parties* -
Total penempatan pada bank lain dan Bank Indonesia		33,779,993	17,075,635	43,794,264	*Total placements with other banks and Bank Indonesia*
Dikurangi: Cadangan kerugian penurunan nilai		(78)	(194)	(98)	*Less: Allowance for impairment losses*
		33,779,915	17,075,441	43,794,166	
Efek-efek	2c,2e,2h,8				*Marketable securities*
- Pihak berelasi	2ac,46d	12,232,740	10,157,415	11,427,357	*Related parties* -
- Pihak ketiga		50,783,955	38,376,931	25,980,323	*Third parties* -
Total efek-efek		63,016,695	48,534,346	37,407,680	*Total marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai		(15)	(273)	(242,941)	*Less: Allowance for impairment losses*
		63,016,680	48,534,073	37,164,739	
Efek-efek yang dibeli dengan janji dijual kembali	2c,2i,14				*Securities purchased under agreements to resell*
- Pihak berelasi	2ac,46e	4,023,688	-	-	*Related parties* -
- Pihak ketiga		2,886,918	7,971,923	13,951,344	*Third parties* -
Total efek-efek yang dibeli dengan janji dijual kembali		6,910,606	7,971,923	13,951,344	*Total securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	2c,2e,2j,9				*Bills and other receivables*
- Pihak berelasi	2ac,46g	5,338,937	6,208,736	10,085,240	*Related parties* -
- Pihak ketiga		8,181,871	7,087,118	9,192,255	*Third parties* -
Total wesel ekspor dan tagihan lainnya		13,520,808	13,295,854	19,277,495	*Total bills and other receivables*
Dikurangi: Cadangan kerugian penurunan nilai		(67,962)	(52,828)	(278,501)	*Less: Allowance for impairment losses*
		13,452,846	13,243,026	18,998,994	

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember/ *December* 2025	31 Desember/ *December* 2024*)	1 Januari/ *January* 2024*)	
ASET (lanjutan)					***ASSETS** (continued)*
Tagihan akseptasi	2c,2e,2n,10				*Acceptance receivables*
- Pihak berelasi	2ac,46h	6,053,827	2,825,260	3,158,955	*Related parties -*
- Pihak ketiga		13,528,919	13,193,510	14,409,720	*Third parties -*
Total tagihan akseptasi		19,582,746	16,018,770	17,568,675	*Total acceptance receivables*
Dikurangi: Cadangan kerugian penurunan nilai		(133,986)	(93,249)	(477,481)	*Less: Allowance for impairment losses*
		19,448,760	15,925,521	17,091,194	
Tagihan derivatif	2c,2e,2k,11				*Derivative receivables*
- Pihak berelasi	2ac,46i	768,083	341,832	37,939	*Related parties -*
- Pihak ketiga		4,654,266	1,451,146	957,738	*Third parties -*
Total tagihan derivatif		5,422,349	1,792,978	995,677	*Total derivative receivables*
Pinjaman yang diberikan	2c,2e,2l,12				*Loans*
- Pihak berelasi	2ac,46j	239,016,801	159,402,689	126,359,320	*Related parties -*
- Pihak ketiga		660,513,890	616,469,089	568,725,449	*Third parties -*
Total pinjaman yang diberikan		899,530,691	775,871,778	695,084,769	*Total loans*
Dikurangi: Cadangan kerugian penurunan nilai		(35,860,626)	(38,684,520)	(47,158,131)	*Less: Allowance for impairment losses*
		863,670,065	737,187,258	647,926,638	
Obligasi Pemerintah setelah penyesuaian amortisasi diskonto dan premi	2c,2e,2h 2ac,13,46f	163,512,901	132,071,569	127,100,369	*Government Bonds adjusted for amortization of discount and premium*
Dikurangi: Cadangan kerugian penurunan nilai		(2,475)	(2,988)	(1,504)	*Less: Allowance for impairment losses*
		163,510,426	132,068,581	127,098,865	
Pajak dibayar di muka	2z,30a	3,090,304	18,950	643,384	*Prepaid taxes*
Beban dibayar di muka	15	2,274,762	2,941,109	2,743,330	*Prepaid expenses*
Investasi pada entitas asosiasi	2d,16,46k	14,354,281	12,748,127	11,283,466	*Investment in associates*
Penyertaan saham - bersih	2c,2o,17,46k	652,311	637,280	563,700	*Equity investments - net*
Aset kontrak asuransi dan reasuransi	2c,2y	80,895	99,181	69,368	*Insurance and reinssurance contract assets*
Aset lain-lain - bersih	2c,2q,2y,18	18,940,646	14,135,421	16,951,818	*Other assets - net*
Aset tetap dan aset hak-guna	2p,19	50,730,702	48,815,943	44,687,850	*Fixed assets and right-of-use assets*
Dikurangi: Akumulasi penyusutan		(19,618,067)	(18,407,707)	(16,922,994)	*Less: Accumulated depreciation*
		31,112,635	30,408,236	27,764,856	
Aset takberwujud	2p,20	742,205	743,314	744,423	*Intangible assets*
Aset pajak tangguhan - bersih	2z,30d	2,315,772	7,145,286	7,648,425	*Deferred tax assets - net*
TOTAL ASET		**1,362,054,731**	**1,130,128,862**	**1,086,920,782**	***TOTAL ASSETS***

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember/ *December* 2025	31 Desember/ *December* 2024*)	1 Januari/ *January* 2024*)	
LIABILITAS DAN EKUITAS					***LIABILITIES AND EQUITY***
LIABILITAS					***LIABILITIES***
Liabilitas segera	2c,2e,2r,21	5,761,037	5,514,720	5,294,952	*Obligations due immediately*
Simpanan nasabah	2c,2e,2s,22				*Deposits from customers*
- Pihak berelasi	2ac,46l	290,807,909	112,833,811	152,080,390	*Related parties* -
- Pihak ketiga		750,026,515	692,677,037	658,649,953	*Third parties* -
Total simpanan nasabah		1,040,834,424	805,510,848	810,730,343	*Total deposits from customers*
Simpanan dari bank lain	2c,2e,2t,23				*Deposits from other banks*
- Pihak berelasi	2ac,46m	2,945,332	4,164,697	2,705,107	*Related parties* -
- Pihak ketiga		8,617,451	14,383,767	9,188,881	*Third parties* -
Total simpanan dari bank lain		11,562,783	18,548,464	11,893,988	*Total deposits from other banks*
Liabilitas derivatif	2c,2e,2k,11				*Derivative payables*
- Pihak berelasi	2ac,46q	977,119	154,840	136,138	*Related parties* -
- Pihak ketiga		4,421,780	1,324,345	674,324	*Third parties* -
Total liabilitas derivatif		5,398,899	1,479,185	810,462	*Total derivative payables*
Efek-efek yang dijual dengan janji dibeli kembali	2c,2e,2i,24				*Securities sold under agreements to repurchase*
- Pihak berelasi	2ac,46s	52,153	-	-	*Related parties* -
- Pihak ketiga		7,199,228	15,890,945	6,891,177	*Third parties* -
Total efek-efek yang dijual dengan janji dibeli kembali		7,251,381	15,890,945	6,891,177	*Total securities sold under agreements to repurchase*
Liabilitas akseptasi	2c,2e,2n,25				*Acceptance payables*
- Pihak berelasi	2ac,46r	501,612	900,755	1,070,600	*Related parties* -
- Pihak ketiga		1,822,893	3,328,729	4,677,947	*Third parties* -
Total liabilitas akseptasi		2,324,505	4,229,484	5,748,547	*Total acceptance payables*
Beban yang masih harus dibayar	2c,26	941,816	1,529,305	1,663,865	*Accrued expenses*
Utang pajak	30b				*Taxes payable*
- Pajak penghasilan badan		263,041	223,208	701,920	*Corporate income tax* -
- Pajak lainnya		151,843	94,361	121,053	*Other taxes* -
Total utang pajak		414,884	317,569	822,973	*Total taxes payable*
Imbalan kerja	2aa,42	8,838,995	7,146,717	7,005,834	*Employee benefits*
Penyisihan	27	1,463,072	2,283,222	2,172,732	*Provisions*
Liabilitas kontrak asuransi	2c,2y,28	22,381,021	19,203,101	17,868,128	*Insurance contract liabilities*
Liabilitas kontrak reasuransi	2c,2y	9,757	6,575	107	*Reinsurance contract liabilities*
Liabilitas lain-lain	2c,29	6,899,224	8,315,596	9,282,732	*Other liabilities*
Efek-efek yang diterbitkan	2c,2e,2u, 31,46n	14,253,190	12,974,497	4,893,357	*Securities issued*
Pinjaman yang diterima	2c,2e,2v, 32,46o	39,040,387	42,931,444	30,949,608	*Borrowings*
Efek-efek subordinasi	2c,33,46p	18,339,988	17,699,183	16,928,731	*Subordinated securities*
TOTAL LIABILITAS		**1,185,715,363**	**963,580,855**	**932,957,536**	***TOTAL LIABILITIES***

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN POSISI KEUANGAN KONSOLIDASIAN
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF FINANCIAL POSITION
31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	31 Desember/ *December* 2025	31 Desember/ *December* 2024*)	1 Januari/ *January* 2024*)	
EKUITAS					***EQUITY***
Ekuitas diatribusikan kepada pemilik entitas induk					*Equity attributable to equity holders of the parent entity*
Modal saham:					*Share capital:*
- Seri A Dwiwarna - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)					*Class A Dwiwarna - Rp3,750 par value per share (in full Rupiah amount)*
- Seri B - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)					*Class B - Rp3,750 par value per share (in full Rupiah amount)*
- Seri C - nilai nominal Rp187,5 per saham (dalam Rupiah penuh)					*Class C - Rp187.5 par value per share (in full Rupiah amount)*
Modal dasar:					*Share capital - Authorised:*
- Seri A Dwiwarna - 1 saham					*Class A Dwiwarna - 1 share*
- Seri B - 578.683.733 saham					*Class B - 578,683,733 shares*
- Seri C - 68.426.325.320 saham					*Class C - 68,426,325,320 shares*
Modal ditempatkan dan disetor penuh:					*Issued and fully paid:*
- Seri A Dwiwarna - 1 saham					*Class A Dwiwarna - 1 share*
- Seri B - 578.683.733 saham					*Class B - 578,683,733 shares*
- Seri C - 36.678.114.582 saham	34	9,054,807	9,054,807	9,054,807	*Class C -36,678,114,582 shares*
Tambahan modal disetor	2d,34	17,010,254	17,010,254	17,010,254	*Additional paid-in capital*
Cadangan pembayaran berbasis saham	2ah,44	349,167	322,589	260,116	*Share-based payment reserve*
Transaksi dengan kepentingan nonpengendali	2d	2,256,999	2,256,999	2,256,999	*Transactions with non-controlling interests*
Cadangan revaluasi aset	19	16,711,395	16,711,395	15,447,829	*Asset revaluation reserve*
Keuntungan/(kerugian) yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	8,13	2,617,037	(1,431,633)	(941,189)	*Unrealised gain/(loss) on marketable securities and Government Bonds at fair value through other comprehensive income, net of tax*
Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing		(124,345)	(96,998)	(58,367)	*Exchange difference on translation of foreign currency financial statements*
Saham Treasuri		-	-	(179,960)	*Treasury Shares*
Saldo laba					*Retained earnings*
Sudah ditentukan penggunaannya					*Appropriated*
Cadangan umum dan wajib	36	2,778,412	2,778,412	2,778,412	*General and legal reserves*
Cadangan khusus		-	-	-	*Specific reserves*
Tidak ditentukan penggunaannya		121,076,418	115,465,415	104,037,335	*Unappropriated*
Total saldo laba		123,854,830	118,243,827	106,815,747	*Total retained earnings*
Total ekuitas yang dapat diatribusikan kepada pemilik entitas induk		**171,730,144**	**162,071,240**	**149,666,236**	***Total equity attributable to equity holders of the parent entity***
Kepentingan non-pengendali		**4,609,224**	**4,476,767**	**4,297,010**	***Non-controlling interests***
TOTAL EKUITAS		**176,339,368**	**166,548,007**	**153,963,246**	***TOTAL EQUITY***
TOTAL LIABILITAS DAN EKUITAS		**1,362,054,731**	**1,130,128,862**	**1,086,920,782**	***TOTAL LIABILITIES AND EQUITY***

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2025	2024*)	
PENDAPATAN BUNGA	2w,38	69,394,154	66,583,110	***INTEREST INCOME***
BEBAN BUNGA	2w,39	(29,060,959)	(26,102,905)	***INTEREST EXPENSE***
PENDAPATAN BUNGA - BERSIH		**40,333,195**	**40,480,205**	***INTEREST INCOME - NET***
Pendapatan premi dan hasil investasi	2y	-	(52)	*Premium income and investment return*
Beban klaim	2y	(1,523)	(1,752)	*Claims expense*
PENDAPATAN PREMI DAN HASIL INVESTASI - BERSIH		**(1,523)**	**(1,804)**	***PREMIUM INCOME AND INVESTMENTS RETURN - NET***
Pendapatan asuransi		1,881,769	1,992,659	*Insurance income*
Beban asuransi		(1,745,928)	(1,535,674)	*Insurance expense*
PENDAPATAN (BEBAN) ASURANSI - BERSIH		**135,841**	**456,985**	***INSURANCE INCOME (EXPENSE) - NET***
Pendapatan hasil investasi		2,029,888	1,255,915	*Investment return*
Beban asuransi keuangan bersih		(1,421,013)	(944,804)	*Net insurance finance expense*
PENDAPATAN ASURANSI DAN HASIL INVESTASI - BERSIH		**744,716**	**768,096**	***NET INSURANCE AND INVESTMENT RESULT***
PENDAPATAN OPERASIONAL LAINNYA				***OTHER OPERATING INCOME***
Provisi dan komisi lainnya	2x	11,167,675	10,599,228	*Other fee and commission*
Laba dari entitas asosiasi		1,627,444	1,522,798	*Income from investment in associates*
Penerimaan kembali aset yang telah dihapusbukukan		5,438,988	6,025,183	*Recovery of assets written off*
Keuntungan yang belum direalisasi dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui laba rugi		141,576	144,558	*Unrealised gain on changes in fair value of financial assets at fair value through profit or loss*
Keuntungan dari penjualan aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan nilai wajar melalui laba rugi		2,885,819	1,769,243	*Gain on sale of financial assets at fair value through other comprehensive income and fair value through profit or loss*
Laba selisih kurs - bersih		1,037,143	1,259,207	*Foreign exchange gains - net*
Lain-lain		1,601,317	1,328,962	*Others*
TOTAL PENDAPATAN OPERASIONAL LAINNYA		**23,899,962**	**22,649,179**	***TOTAL OTHER OPERATING INCOME***
PEMBENTUKAN CADANGAN KERUGIAN PENURUNAN NILAI		**(9,724,370)**	**(8,210,562)**	***ALLOWANCE FOR IMPAIRMENT LOSSES***
BEBAN OPERASIONAL LAINNYA				***OTHER OPERATING EXPENSES***
Gaji dan tunjangan	40,46w	(14,529,204)	(13,781,507)	*Salaries and employees' benefits*
Umum dan administrasi	41	(9,394,734)	(9,025,482)	*General and administrative*
Premi penjaminan simpanan		(1,703,849)	(1,567,476)	*Deposit guarantee premium*
Beban promosi		(1,187,693)	(1,103,491)	*Promotion expense*
Lain-lain		(4,040,876)	(3,634,270)	*Others*
TOTAL BEBAN OPERASIONAL LAINNYA		**(30,856,356)**	**(29,112,226)**	***TOTAL OTHER OPERATING EXPENSES***

*) Disajikan kembali (lihat Catatan 60).

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2025	2024*)	
LABA OPERASIONAL		**24,395,624**	**26,572,888**	***OPERATING INCOME***
PENDAPATAN/(BEBAN) BUKAN OPERASIONAL - BERSIH		**1,839**	**(3,797)**	***NON-OPERATING INCOME/(EXPENSE - NET***
LABA SEBELUM BEBAN PAJAK		**24,397,463**	**26,569,091**	***INCOME BEFORE TAX EXPENSES***
BEBAN PAJAK				***TAX EXPENSES***
Kini		(46,015)	(4,495,531)	*Current*
Tangguhan		(4,240,408)	(404,163)	*Deferred*
TOTAL BEBAN PAJAK	2z,30c	(4,286,423)	(4,899,694)	***TOTAL TAX EXPENSES***
LABA BERSIH		**20,111,040**	**21,669,397**	***NET INCOME***
PENGHASILAN KOMPREHENSIF LAIN:				***OTHER COMPREHENSIVE INCOME:***
Pos-pos yang tidak akan direklasifikasi ke laba rugi				***Items that will not be reclassified to profit or loss***
Keuntungan yang berasal dari revaluasi aset tetap	2p	-	1,263,566	*Gain from revaluation of fixed assets*
Pengukuran kembali liabilitas imbalan kerja	2aa	(591,455)	523,859	*Remeasurement of post employment benefit*
Pajak penghasilan terkait		112,403	(99,722)	*Related income tax*
Pos-pos yang akan direklasifikasi ke laba rugi				***Items that will be reclassified to profit or loss***
Penyesuaian akibat penjabaran laporan keuangan dalam mata uang asing	2e	(27,347)	(38,631)	*Translation adjustment of foreign currency financial statements*
Keuntungan dari perubahan nilai aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain		5,084,110	(770,837)	*Gain on changes in value of financial assets at fair value through other comprehensive income*
Pajak penghasilan terkait		(972,629)	152,276	*Related income tax*
LABA KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK		**3,605,082**	**1,030,511**	***OTHER COMPREHENSIVE INCOME FOR THE YEAR AFTER TAXES***
TOTAL LABA KOMPREHENSIF TAHUN BERJALAN		**23,716,122**	**22,699,908**	***TOTAL COMPREHENSIVE INCOME FOR THE YEAR***
LABA TAHUN BERJALAN DIATRIBUSIKAN KEPADA:				***INCOME FOR THE YEAR ATTRIBUTABLE TO:***
Pemilik entitas induk		20,040,703	21,463,599	*Equity holders of the parent entity*
Kepentingan non-pengendali		70,337	205,798	*Non-controlling interest*
TOTAL		**20,111,040**	**21,669,397**	***TOTAL***

*) Disajikan kembali (lihat Catatan 60).

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN KONSOLIDASIAN UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2025	2024*)	
LABA KOMPREHENSIF TAHUN BERJALAN DIATRIBUSIKAN KEPADA:				***TOTAL COMPREHENSIVE INCOME FOR THE YEAR ATTRIBUTABLE TO:***
Pemilik entitas induk		23,583,665	22,551,316	*Equity holders of the parent entity*
Kepentingan nonpengendali		132,457	148,592	*Non-controlling interest*
TOTAL		**23,716,122**	**22,699,908**	***TOTAL***
LABA PER SAHAM DASAR/DILUSIAN DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK (DALAM RUPIAH PENUH)	2ab,43	**537**	**576**	***BASIC/DILUTED EARNINGS PER SHARE ATTRIBUTABLE TO EQUITY HOLDERS OF THE PARENT ENTITY (IN FULL RUPIAH AMOUNT)***

*) Disajikan kembali (lihat Catatan 60).

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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PT BANK NEGARA INDONESIA (PERSERO) Tbk
DAN ENTITAS ANAK/*AND SUBSIDIARIES*

LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Transaksi dengan kepentingan nonpengendali/ *Transactions with non-controlling interest*	Keuntungan yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealised gain on marketable securities and Government Bonds at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference on translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Cadangan pembayaran berbasis saham/ *Share-based payment reserve*	Total ekuitas pemilik entitas induk/*Total equity owners of parent*	Kepentingan nonpengendali/ *Non-controlling interest*	Total ekuitas/ *Total equity*	
								Dicadangkan/ *Appropriated*						
								Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated*[*)]					
Saldo pada tanggal 31 Desember 2024 **)		**9,054,807**	**17,010,254**	**2,256,999**	**(1,431,633)**	**(96,998)**	**16,711,395**	**2,778,412**	**115,465,415**	**322,589**	**162,071,240**	**4,476,767**	**166,548,007**	***Balance as of 31 December 2024*** **)
Laba tahun berjalan		-	-	-	-	-	-	-	19,562,342	-	19,562,342	70,337	19,632,679	*Profit for the year*
Laba komprehensif lainnya untuk tahun berjalan	8,13	-	-	-	4,048,670	(27,347)	-	-	-	-	4,021,323	62,120	4,083,443	*Other comprehensive income for the year*
Pembagian dividen	35	-	-	-	-	-	-	-	(13,951,339)	-	(13,951,339)		(13,951,339)	*Distribution of dividends*
Saham treasuri		-	-	-	-	-	-	-	-	-	-	-	-	*Treasury shares*
Penambahan cadangan pembayaran berbasis saham	44	-	-	-	-	-	-	-	-	26,578	26,578	-	26,578	*Additional of share-based payment reserve*
Saldo pada tanggal 31 Desember 2025		**9,054,807**	**17,010,254**	**2,256,999**	**2,617,037**	**(124,345)**	**16,711,395**	**2,778,412**	**121,076,418**	**349,167**	**171,730,144**	**4,609,224**	**176,339,368**	***Balance as of 31 December 2025***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.
**) Disajikan kembali (lihat Catatan 60).

*) *Included in unappropriated retained earnings is the remeasurement of post employment benefit.*
**) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN PERUBAHAN EKUITAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CHANGES IN EQUITY
FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Transaksi dengan kepentingan nonpengendali/ *Transactions with non-controlling interest*	Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealised losses on marketable securities and Government Bonds at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference on translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan pembayaran berbasis saham/ *Share-based payment reserve*	Total ekuitas pemilik entitas induk/*Total equity owners of parent*	Kepentingan nonpengendali/ *Non-controlling interest*	Total ekuitas/ *Total equity*	
								Dicadangkan/ *Appropriated*							
								Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated*[*)]						
Saldo pada tanggal 31 Desember 2023		**9,054,807**	**17,010,254**	**2,256,999**	**(896,178)**	**(58,367)**	**15,447,829**	**2,778,412**	**104,457,102**	**(179,960)**	**260,116**	**150,131,014**	**4,601,506**	**154,732,520**	***Balance as of 31 December 2023***
Dampak penyesuaian transisi atas penerapan PSAK 117		-	-	-	(45,011)	-	-	-	(419,767)	-	-	(464,778)	(304,496)	(769,274)	*Impact from the adoption of SFAS 117*
Saldo per 1 Januari 2024 setelah penerapan PSAK 117 **)		**9,054,807**	**17,010,254**	**2,256,999**	**(941,189)**	**(58,367)**	**15,447,829**	**2,778,412**	**104,037,335**	**(179,960)**	**260,116**	**149,666,236**	**4,297,010**	**153,963,246**	***Balance as of 1 January 2024 after adoption of SFAS 117*** **)**
Laba tahun berjalan		-	-	-	-	-	-	-	21,882,818	-	-	21,882,818	205,798	22,088,616	*Profit for the year*
Laba komprehensif untuk tahun berjalan	8,13	-	-	-	(490,444)	(38,631)	1,263,566	-	-	-	-	734,491	(26,041)	708,450	*Comprehensive income for the year*
Pembagian dividen	35	-	-	-	-	-	-	-	(10,454,738)	-	-	(10,454,738)	-	(10,454,738)	*Distribution of dividends*
Saham treasuri		-	-	-	-	-	-	-	-	179,960	-	179,960	-	179,960	*Treasury shares*
Penambahan cadangan pembayaran berbasis saham	44	-	-	-	-	-	-	-	-	-	62,473	62,473	-	62,473	*Additional of share-based payment reserve*
Saldo pada tanggal 31 Desember 2024		**9,054,807**	**17,010,254**	**2,256,999**	**(1,431,633)**	**(96,998)**	**16,711,395**	**2,778,412**	**115,465,415**	**-**	**322,589**	**162,071,240**	**4,476,767**	**166,548,007**	***Balance as of 31 Desember 2024***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.
**) Disajikan kembali (lihat Catatan 60).

*) *Included in unappropriated retained earnings is the remeasurement of post employment benefit.*
**) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

The accompanying notes to the consolidated financial statements form an integral part of these consolidated financial statements taken as a whole.

LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2025	2024*)	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan pendapatan bunga		68,404,129	66,149,661	*Receipts from interest income*
Pembayaran beban bunga		(26,839,809)	(26,031,790)	*Payments of interest expense*
Pendapatan premi dan hasil investasi		-	(52)	*Premium and investment income*
Beban klaim		(1,523)	(1,752)	*Claims expense*
Penerimaan kas dari aktivitas asuransi		5,717,804	5,481,495	*Cash received from insurance activity*
Pembayaran kas dari aktivitas asuransi		(4,333,705)	(4,453,367)	*Cash paid from insurance activity*
Pendapatan hasil investasi		1,622,432	1,455,232	*Investment return*
Pendapatan operasional lainnya		22,516,510	25,482,367	*Other operating income*
Beban operasional lainnya		(24,999,612)	(25,767,786)	*Other operating expenses*
Pendapatan (beban) bukan operasional - bersih		1,839	(3,797)	*Non-operating income (expenses) - net*
Pembayaran pajak penghasilan		(3,077,536)	(4,349,809)	*Payment of income tax*
Arus kas sebelum perubahan dalam aset dan liabilitas operasi		**39,010,529**	**37,960,402**	***Cash flows before changes in operating assets and liabilities***
Perubahan dalam aset dan liabilitas operasi:				***Changes in operating assets and liabilities:***
(Kenaikan)/penurunan aset operasi:				*(Increase)/decrease in operating assets:*
Penempatan pada Bank Indonesia dan bank lain		247,036	(52,468)	*Placements with Bank Indonesia and other banks*
Efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui laba rugi		(12,403,373)	(13,980,215)	*Marketable securities and Government Bonds at fair value through profit or loss*
Efek-efek yang dibeli dengan janji dijual kembali	14	1,061,317	5,979,421	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya		(224,954)	5,981,641	*Bills and other receivables*
Pinjaman yang diberikan		(139,283,994)	(99,510,845)	*Loans*
Tagihan akseptasi		(3,563,976)	1,549,905	*Acceptance receivables*
Beban dibayar di muka	15	(655,419)	(197,779)	*Prepaid expenses*
Penempatan *term deposit* valas devisa hasil ekspor		509,168	1,631,137	*Foreign exchange term deposit from export activities*
Aset lain-lain		(3,368,155)	1,618,354	*Other assets*
(Penurunan)/kenaikan liabilitas operasi:				*(Decrease)/increase in operating liabilities:*
Liabilitas segera	21	246,317	219,768	*Obligations due immediately*
Simpanan nasabah	22	235,323,576	(5,219,495)	*Deposits from customers*
Simpanan dari bank lain	23	(6,985,681)	6,654,476	*Deposits from other banks*
Kewajiban atas penempatan *term deposit* valas devisa hasil ekspor		(509,168)	(1,631,138)	*Liabilities related to foreign exchange term deposit from export activities*
Beban yang masih harus dibayar	26	(587,489)	(134,560)	*Accrued expenses*
Imbalan kerja	42	(3,920,433)	(3,188,759)	*Employee benefits*
Liabilitas akseptasi	25	(1,904,979)	(1,519,063)	*Acceptance payables*
Utang pajak		57,482	(26,693)	*Taxes payable*
Liabilitas lain-lain	29	54,595	647,998	*Other liabilities*
Kas bersih diperoleh dari/ (digunakan) untuk aktivitas operasi		**103,102,399**	**(63,217,913)**	***Net cash provided from/ (used) in operating activities***

*) Disajikan kembali (lihat Catatan 60).

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2025	2024*)	
ARUS KAS DARI AKTIVITAS INVESTASI				***CASH FLOWS FROM INVESTING ACTIVITIES***
ARUS KAS DARI AKTIVITAS INVESTASI				***CASH FLOWS FROM INVESTING ACTIVITIES***
Penjualan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		97,630,328	192,702,098	*Proceed from marketable securities measured at fair value through other comprehensive income and amortised cost*
Pembelian efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		(98,070,846)	(193,676,092)	*Placement from marketable securities measured at fair value through other comprehensive income and amortised cost*
Penjualan dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		146,726,261	133,707,136	*Proceed of Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi		(170,024,356)	(134,923,291)	*Placement of Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian aset tetap	19	(2,914,964)	(3,106,669)	*Acquisition of fixed assets*
Hasil penjualan aset tetap		15,911	26,713	*Proceeds from sale of fixed assets*
Kas bersih digunakan untuk aktivitas investasi		**(26,637,666)**	**(5,270,105)**	***Net cash used in investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerimaan pinjaman yang diterima		27,349,766	29,009,391	*Receipt from borrowings*
Pembayaran pinjaman yang diterima		(32,634,808)	(16,584,455)	*Payment for borrowings*
Penerimaan efek-efek yang dijual dengan janji dibeli kembali	24	4,821,302	9,351,740	*Receipt in securities sold under agreements to repurchase*
Pembayaran efek-efek yang dijual dengan janji dibeli kembali	24	(13,607,006)	(920,846)	*Payment for securities sold under agreements to repurchase*
Penerimaan efek-efek yang diterbitkan		5,013,486	8,187,500	*Receipt in securities issued*
Pembayaran efek-efek yang diterbitkan		(4,000,000)	-	*Payment in securities issued*
Pembayaran liabilitas sewa		(547,116)	(870,149)	*Payment of lease liability*
Pembayaran dividen		(13,951,339)	(10,454,738)	*Payment of dividends*
Kas bersih (digunakan) untuk/ diperoleh dari aktivitas pendanaan		**(27,555,715)**	**17,718,443**	***Net cash (used) in/ provided from financing activities***
KENAIKAN/(PENURUNAN) BERSIH KAS DAN SETARA KAS		**48,909,018**	**(50,769,575)**	***NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN		**104,074,764**	**154,879,093**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF THE YEAR***
Pengaruh perubahan kurs mata uang asing		(131,514)	(34,754)	*Effect of foreign currency exchange rate changes*
KAS DAN SETARA KAS PADA AKHIR TAHUN		**152,852,268**	**104,074,764**	***CASH AND CASH EQUIVALENTS AT THE END OF THE YEAR***

*) Disajikan kembali (lihat Catatan 60).

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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LAPORAN ARUS KAS KONSOLIDASIAN
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

CONSOLIDATED STATEMENTS OF CASH FLOWS FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Catatan/ *Notes*	2025	2024*)	
KAS DAN SETARA KAS TERDIRI DARI:				***CASH AND CASH EQUIVALENTS CONSIST OF:***
Kas	4	13,352,065	13,709,930	*Cash*
Giro pada Bank Indonesia	5	79,989,122	51,669,054	*Current accounts with Bank Indonesia*
Giro pada bank lain	6	25,938,093	22,074,186	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - jangka waktu jatuh tempo tiga bulan atau kurang sejak tanggal perolehan		33,572,988	16,621,594	*Placements with Bank Indonesia and other banks - maturing within three months of acquisition date*
Total kas dan setara kas		**152,852,268**	**104,074,764**	***Total cash and cash equivalents***

*) Disajikan kembali (lihat Catatan 60).

*) *Restated (see Note 60)*

Catatan atas laporan keuangan konsolidasian terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan konsolidasian secara keseluruhan.

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1. INFORMASI UMUM

a. Pendirian Bank

PT Bank Negara Indonesia (Persero) Tbk ("BNI" atau "Bank") pada awalnya didirikan di Indonesia sebagai bank sentral dengan nama "Bank Negara Indonesia" berdasarkan Peraturan Pemerintah Pengganti Undang-Undang No. 2 tahun 1946 tanggal 5 Juli 1946. Selanjutnya, berdasarkan Undang-Undang No. 17 tahun 1968, BNI ditetapkan menjadi "Bank Negara Indonesia 1946", dan statusnya menjadi Bank Umum Milik Negara.

Berdasarkan Peraturan Pemerintah No. 19 tahun 1992, tanggal 29 April 1992, telah dilakukan penyesuaian bentuk hukum BNI menjadi perusahaan perseroan terbatas (Persero). Penyesuaian bentuk hukum menjadi Persero, dinyatakan dalam Akta No. 131, tanggal 31 Juli 1992, dibuat di hadapan Muhani Salim, S.H., yang telah diumumkan dalam Berita Negara Republik Indonesia No. 73 tanggal 11 Desember 1992 Tambahan No. 1A.

Untuk memenuhi ketentuan Undang-Undang No. 40 Tahun 2007 tanggal 16 Agustus 2007 tentang Perseroan Terbatas, Anggaran Dasar BNI telah dilakukan penyesuaian. Penyesuaian tersebut dinyatakan dalam Akta No. 46 tanggal 13 Juni 2008 yang dibuat di hadapan Fathiah Helmi, S.H., notaris di Jakarta, berdasarkan keputusan Rapat Umum Pemegang Saham Luar Biasa tanggal 28 Mei 2008 dan telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-AH.01.02-50609 tanggal 12 Agustus 2008 dan telah diumumkan dalam Berita Negara Republik Indonesia No. 103 tanggal 23 Desember 2008 Tambahan No. 29015.

Anggaran Dasar BNI sebagaimana termaktub dalam Akta Pernyataan Keputusan RUPS Luar Biasa Nomor 18 tanggal 19 Desember 2023 Notaris Ashoya Ratam, S.H., M.Kn. yang telah mendapatkan persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat Nomor AHU-AH.01.03-0119983 tanggal 19 Desember 2023 dan telah diubah berdasarkan Akta Pernyataan Keputusan RUPS Tahunan Nomor 27 tanggal 22 April 2025 oleh Notaris Ashoya Ratam, S.H., M.Kn. yang telah diterima dan dicatat oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat No. AHU-AH.01.03-0110504 tanggal 23 April 2025.

1. GENERAL INFORMATION

a. Establishment of the Bank

PT Bank Negara Indonesia (Persero) Tbk ("BNI" or "Bank") was originally established in Indonesia as the central bank under the name "Bank Negara Indonesia" based on Government Regulation in Lieu of Law No. 2 of 1946 dated 5 July 1946. Subsequently, by virtue of Law No. 17 of 1968, BNI became "Bank Negara Indonesia 1946", and changed its status to a state-owned commercial bank.

Based on Government Regulation No. 19 of 1992, dated 29 April 1992, BNI changed its legal status to a limited liability corporation (Persero). The change in legal status to become a limited liability corporation was covered by Notarial Deed No. 131, dated 31 July 1992 of Muhani Salim, S.H., and was published in Supplement No. 1A of the State Gazette No. 73 dated 11 December 1992.

In compliance with the Indonesian Limited Liability Company Law No. 40 Year 2007 dated 16 August 2007, BNI's Articles of Association has been amended. The amendment was covered by Notarial Deed No. 46 dated 13 June 2008 of Fathiah Helmi, S.H., a notary in Jakarta, as approved in the Extraordinary General Shareholders' Meeting on 28 May 2008 and approved by the Minister of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-AH.01.02-50609 dated 12 August 2008 and published in Supplement No. 29015 of the State Gazette No. 103 dated 23 December 2008.

BNI's Articles of Association as stated on Notarial Deed No. 18 dated 19 December 2023 of Ashoya Ratam, S.H., M.Kn. and has been approved by the Minister of Laws and Human Rights of the Republic of Indonesia, in its decision letter No. AHU-AH.01.03-0119983 dated 19 December 2023 has been amended as stated in the Notarial Deed of Extraordinary General Shareholders' Meeting No. 27 dated 22 April 2025 by Notary Ashoya Ratam, S.H., M.KN., which has been approved by the Minister of Law and Human Rights of the Republic of Indonesia in its decision letter No. AHU-AH.01.03-0110504 dated 23 April 2025.

1. INFORMASI UMUM (lanjutan)

a. Pendirian Bank (lanjutan)

Berdasarkan Pasal 3 Anggaran Dasar BNI, ruang lingkup kegiatan BNI adalah melakukan usaha di bidang perbankan umum.

b. Penawaran Umum Perdana Saham ("IPO")

Pada tanggal 28 Oktober 1996, BNI melakukan penawaran umum perdana atas 1.085.032.000 saham Seri B dengan nilai nominal sebesar Rp500 (nilai penuh) setiap saham dan harga penawaran setiap saham sebesar Rp850 (nilai penuh) kepada masyarakat di Indonesia. Saham yang ditawarkan tersebut mulai diperdagangkan di Bursa Efek Jakarta dan Surabaya (sekarang Bursa Efek Indonesia atau BEI) pada tanggal 25 November 1996.

c. Penawaran Umum Saham Terbatas I

Pada tanggal 30 Juni 1999, BNI melakukan Penawaran Umum Terbatas I dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu (HMETD) sebanyak 151.904.480.000 saham Seri C dengan nilai nominal sebesar Rp25 (nilai penuh) setiap saham. Setiap pemegang 1 saham lama berhak membeli 35 saham baru dengan harga Rp347,58 (nilai penuh) setiap saham. Dari penawaran umum ini, BNI meningkatkan modal sahamnya sebanyak 683.916.500 lembar saham Seri C yang diterbitkan kepada masyarakat umum pada tanggal 21 Juli 1999 dan terdaftar di Bursa Efek Jakarta dan Surabaya (sekarang BEI). BNI juga menerbitkan 151.220.563.500 lembar saham Seri C kepada Pemerintah Indonesia pada tanggal 7 April 2000 dan 30 Juni 2000 melalui program rekapitalisasi berdasarkan Peraturan Pemerintah No. 52 tahun 1999.

d. Rekapitalisasi

Pada tanggal 30 Maret 2000, Menteri Keuangan menyetujui rekapitalisasi BNI sebesar Rp61,8 triliun, yang meningkat sebesar Rp9 triliun dibandingkan dengan jumlah yang ditetapkan dalam Peraturan Pemerintah No. 52 tahun 1999. Sehubungan dengan peningkatan rekapitalisasi tersebut, yang telah disetujui melalui Peraturan Pemerintah No. 32 tahun 2000, BNI menerbitkan tambahan saham Seri C sebanyak 44.946.404.500 saham tanpa Hak Memesan Efek Terlebih Dahulu.

***1. GENERAL INFORMATION** (continued)*

***a. Establishment of the Bank** (continued)*

According to Article 3 of BNI's Articles of Association, BNI's scope of activity is to engage in general banking services.

b. Initial Public Offering ("IPO")

On 28 October 1996, BNI undertook an initial public offering of 1,085,032,000 Class B shares with a par value per share of Rp500 (full amount) and offering price per share of Rp850 (full amount) to the public in Indonesia. The shares began trading on the Jakarta and Surabaya Stock Exchanges (currently Indonesia Stock Exchange or IDX) on 25 November 1996.

c. Limited Public Offering I

On 30 June 1999, BNI undertook a Limited Public Offering I ("LPO I") through the issuance of pre-emptive rights of 151,904,480,000 Class C shares with a par value per share of Rp25 (full amount). Each holder of 1 share was entitled to buy 35 new shares for Rp347.58 (full amount) per share. As a result of LPO I, BNI increased its capital by 683,916,500 Class C shares issued to the public on 21 July 1999 and the LPO I listed in the Jakarta and Surabaya Stock Exchanges (currently IDX). On 7 April 2000 and 30 June 2000, BNI also issued 151,220,563,500 Class C shares to the Government of Indonesia through the recapitalization program under the Government Regulation No. 52 year 1999.

d. Recapitalization

On 30 March 2000, the Ministry of Finance approved BNI's recapitalization amounting to Rp61.8 trillion, which was Rp9 trillion higher than the amount stated in the Government Regulation No. 52 year 1999. In connection with the increase in the recapitalization amount, which was approved in the Government Regulation No. 32 year 2000, BNI issued additional 44,946,404,500 Class C shares without pre-emptive rights.

1. INFORMASI UMUM (lanjutan)

d. Rekapitalisasi (lanjutan)

Pada tanggal 20 Juli 2001, modal saham BNI berkurang sebanyak 1.965.701.500 saham Seri C sehubungan dengan pengembalian kelebihan dana rekapitalisasi kepada Pemerintah Indonesia. Pengembalian tersebut telah disetujui oleh pemegang saham dalam Rapat Umum Pemegang Saham Luar Biasa pada tanggal 25 Juni 2001.

e. Kuasi-reorganisasi

Untuk menghilangkan konsekuensi negatif karena dibebani dengan saldo rugi, BNI melakukan kuasi-reorganisasi sesuai keputusan Rapat Umum Pemegang Saham Luar Biasa ("RUPS-LB") tanggal 15 Desember 2003.

Penyesuaian kuasi-reorganisasi yang telah dibukukan pada tanggal 30 Juni 2003 adalah sebagai berikut:

Akumulasi kerugian	(58,905,232)	*Accumulated losses*
Cadangan umum dan wajib	432,952	*General and legal reserve*
Cadangan khusus	382,541	*Specific reserve*
Selisih penilaian kembali aktiva tetap	1,190,598	*Fixed assets revaluation reserve*
Laba yang belum direalisasi atas efek-efek dalam kelompok tersedia untuk dijual	58,660	*Unrealised gain on available for sale securities*
Kenaikan penilaian kembali nilai wajar aktiva bersih	2,472,634	*Revaluation uplift in the fair value of net assets*
Tambahan modal disetor	54,367,847	*Additional paid-in capital*
	-	

Anggaran Dasar BNI telah mengalami perubahan sehubungan dengan perubahan tambahan modal disetor karena adanya kuasi-reorganisasi sesuai dengan Akta Notaris Agung Prihatin, S.H., No. 42 tanggal 30 Desember 2003 dan telah disahkan oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan surat keputusan No. C-29647.HT.01.07.TH.2003 tanggal 19 Desember 2003 dan diumumkan pada Berita Negara Republik Indonesia No. 1152 tanggal 30 Januari 2004, Tambahan No. 9.

f. Penawaran Umum Saham Terbatas II

Pada tanggal 30 Juli 2007, pada Rapat Umum Pemegang Saham Luar Biasa ("RUPSLB"), Pemegang Saham telah memutuskan untuk melakukan Penawaran Umum Terbatas II kepada para pemegang saham dalam rangka penerbitan sampai dengan sejumlah 1.992.253.110 saham Seri C baru dengan nilai nominal Rp375 (nilai penuh) setiap lembar saham.

***1. GENERAL INFORMATION** (continued)*

***d. Recapitalization** (continued)*

On 20 July 2001, BNI's capital was reduced by 1,965,701,500 Class C shares in connection with the refund of excess recapitalization funds to the Government of Indonesia. The refund was approved by the shareholders at the Extraordinary General Shareholders' Meeting held on 25 June 2001.

e. Quasi-reorganization

In order for BNI to eliminate the negative consequences of being burdened by accumulated losses, BNI undertook quasi-reorganization as approved in the Extraordinary General Shareholders' Meeting ("RUPS-LB") on 15 December 2003.

The quasi-reorganization adjustments which were booked on 30 June 2003 were as follows:

BNI's Articles of Association were amended to reflect the changes in additional paid-in capital as a result of quasi-reorganization, based on Notarial Deed of Agung Prihatin, S.H., No. 42 dated 30 December 2003 which was approved by the Minister of Law and Human Rights of the Republic of Indonesia in its decision letter No. C-29647.HT.01.07.TH.2003 dated 19 December 2003 and was published in the State Gazette No. 1152, Supplement No. 9 dated 30 January 2004.

f. Limited Public Offering II

On 30 July 2007, the Extraordinary General Shareholders' Meeting approved the issuance of up to 1,992,253,110 new Class C shares through Limited Public Offering II to shareholders with a par value per share of Rp375 (full amount).

1. INFORMASI UMUM (lanjutan)

f. Penawaran Umum Saham Terbatas II (lanjutan)

Setiap pemegang 20 saham lama yang namanya tercatat dalam Daftar Pemegang Saham BNI pada tanggal 9 Agustus 2007 pukul 16.00 WIB mempunyai 3 HMETD, dimana setiap 1 HMETD memberikan hak kepada pemegangnya untuk membeli sebanyak 1 saham baru dengan harga pelaksanaan Rp2.025 (nilai penuh) setiap saham. Dari Penawaran Umum Terbatas II, BNI mendapatkan tambahan modal disetor sebesar Rp747.094 dan tambahan agio saham sebesar Rp3.287.218 dan biaya emisi penerbitan saham sebesar Rp195.280.

Perdagangan perdana dilaksanakan pada tanggal 13 Agustus 2007 di Bursa Efek Jakarta dan Bursa Efek Surabaya (sekarang BEI).

g. Penawaran Umum Saham Terbatas III

Pada tanggal 25 November 2010, dalam Rapat Umum Pemegang Saham Luar Biasa (RUPSLB), Pemegang Saham telah memutuskan antara lain untuk menyetujui peningkatan modal ditempatkan dan disetor BNI melalui Penawaran Umum Terbatas III (PUT III) dengan penerbitan HMETD sebesar 3.374.715.948 saham Seri C baru dengan nilai nominal Rp375 (nilai penuh) setiap lembar saham. HMETD tersebut dapat diperdagangkan di dalam dan di luar Bursa Efek Indonesia (BEI) mulai tanggal 10 Desember 2010 sampai dengan 16 Desember 2010, dengan memperhatikan ketentuan yang berlaku di bidang pasar modal. Dari PUT III tersebut, BNI mendapatkan tambahan modal disetor sebesar Rp1.265.519 dan tambahan agio saham, bersih setelah dikurangkan dengan biaya emisi penerbitan saham, sebesar Rp8.950.869.

h. Pemecahan nilai nominal saham BNI

Berdasarkan keputusan RUPSLB tanggal 19 Desember 2023 yang dituangkan dalam Akta No. 18, tanggal 19 Desember 2023, yang dibuat dihadapan Ashoya Ratam S.H., M.KN, pemegang saham BNI antara lain menyetujui pemecahan nilai nominal saham *(stock split)* Bank dengan rasio 1:2 yang berlaku efektif pada tanggal 10 Oktober 2023 (lihat Catatan 33).

***1. GENERAL INFORMATION** (continued)*

***f. Limited Public Offering II** (continued)*

Each owner of 20 old shares whose name was registered in the List of Shareholders of BNI as of 9 August 2007 at 16.00 WIB was entitled to 3 pre-emptive rights where each right entitles the owner to buy a new share at the price of Rp2,025 (full amount) per share. From the Limited Public Offering II, BNI raised Rp747,094 additional share capital and Rp3,287,218 additional paid-in capital and Rp195,280 shares issuance cost.

The initial trading took place on 13 August 2007 at the Jakarta Stock Exchange and Surabaya Stock Exchange (currently IDX).

g. Limited Public Offering III

On 25 November 2010, at the Extraordinary General Shareholders' Meeting, the shareholders decided, among other matters, to increase the issued and paid-up capital through limited public offering (LPO III) with pre-emptive right to shareholders for the issuance of 3,374,715,948 new Class C shares with a par value per share of Rp375 (full amount). Such pre-emptive rights can be traded inside and outside the Indonesia Stock Exchange (IDX) starting 10 December 2010 until 16 December 2010, with consideration to the existing capital market regulation. From the LPO III, BNI obtained Rp1,265,519 additional share capital and Rp8,950,869 additional paid-in capital, net of shares issuance cost.

h. Stock split of BNI

Based on the decision of the Extraordinary General Meeting of Shareholders (RUPSLB) dated 19 December 2023, as stated in Deed No. 18 dated 19 December 2023, as recorded in the Notarial Deed of Ashoya Ratam, S.H., M.KN., the shareholders of BNI, among others, approved the nominal value split (stock split) of the Bank with a ratio of 1:2, effective from 10 October 2023 (see Note 33).

1. INFORMASI UMUM (lanjutan)

i. Organisasi dan Struktur Manajemen

Susunan Dewan Komisaris dan Direksi BNI pada tanggal 15 Desember 2025 dan 31 Desember 2024 yang ditetapkan masing-masing berdasarkan Berita Acara RUPS Tahunan BNI yang dinyatakan dengan Akta Notaris No. 02 tanggal 15 Desember 2025, dan Akta Notaris No. 3 tanggal 4 Maret 2024 adalah sebagai berikut:

1. GENERAL INFORMATION (continued)

i. Organizational and Management Structure

The composition of the Boards of Commissioners and Directors of BNI as of 15 December 2025 and 31 December 2024 based on BNI's Annual Shareholders' General Meeting as stated under Notarial Deed No. 02 dated 15 December 2025, and the Notarial Deed No. 3 dated 4 March 2024, respectively, are as follows:

31 Desember 2025/*December 2025*

Dewan Komisaris		***Board of Commissioners***
Komisaris Utama/ Komisaris Independen	Omar Sjawaldy Anwar	*President Commissioner/ Independent Commissioner*
Wakil Komisaris Utama	Tedi Bharata	*Vice President Commissioner*
Komisaris Independen	Vera Febyanthy	*Independent Commissioner*
Komisaris Independen	Didik Junaedi Rachbini	*Independent Commissioner*
Komisaris	Febrio Nathan Kacaribu**)	*Commissioner*
Komisaris	Donny Hutabarat	*Commissioner*

31 Desember 2025/*December 2025*

Direksi		***Board of Directors***
Direktur Utama	Putrama Wahju Setyawan	*President Director (CEO)*
Wakil Direktur Utama	Alexandra Askandar	*Vice President Director*
Direktur *Finance & Strategy*	Hussein Paolo Kartadjoemena	*Managing Director – Finance & Strategy*
Direktur *Risk Management*	David Pirzada	*Managing Director - Risk Management*
Direktur *Corporate Banking*	Agung Prabowo	*Managing Director - Corporate Banking*
Direktur *Commercial Banking*	Muhammad Iqbal	*Managing Director - Commercial Banking*
Direktur *Operations*	Ronny Venir	*Managing Director - Operations*
Direktur *Network & Retail Funding*	Rian Eriana Kaslan	*Managing Director – Network & Retail Funding*
Direktur *Consumer Banking*	Corina Leyla Karnalies	*Managing Director - Consumer Banking*
Direktur *Information Technology*	Toto Prasetio	*Managing Director – Information Technology*
Direktur *Human Capital & Compliance*	Munadi Herlambang	*Managing Director - Human Capital & Compliance*
Direktur *Treasury & International Banking*	Abu Santosa Sudradjat	*Managing Director - Treasury & Banking*
Direktur Kelembagaan	Eko Setyo Nugroho	*Managing Director - Institutional*

31 Desember 2025/*December 2025*

Komite Audit*)		***Audit Committee*)**
Ketua	Didik Junaedi Rachbini	*Chairman*
Anggota	Omar Sjawaldy Anwar	*Member*
Anggota	Vera Febyanthy	*Member*
Anggota	Alih Suasono	*Member*
Anggota	John Fernando Tamba	*Member*

*) Pembentukan Komite Audit Bank telah dilakukan sesuai dengan Peraturan OJK No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.
**) Dapat menjalankan tindakan, tugas, dan fungsinya setelah mendapatkan persetujuan *Fit & Proper Test* dari OJK.

*) *The Formation of Audit Committee is in accordance with Financial Service Authority Rule No. 55/POJK.04/2015 regarding the Establishment and Guidelines for the Work Implementation of the Audit Committee.*
**) *Authorized to perform actions, duties, and functions after obtaining Fit and Proper Test approval from the Financial Services Authority (OJK).*

1. INFORMASI UMUM (lanjutan)

i. Organisasi dan Struktur Manajemen (lanjutan)

1. GENERAL INFORMATION *(continued)*

i. Organizational and Management Structure *(continued)*

31 Desember 2024/*December 2024*

Dewan Komisaris		***Board of Commissioners***
Komisaris Utama/ Komisaris Independen	Pradjoto	*President Commissioner/ Independent Commissioner*
Wakil Komisaris Utama	Pahala Nugraha Mansury	*Vice President Commissioner*
Komisaris Independen	Sigit Widyawan	*Independent Commissioner*
Komisaris Independen	Asmawi Syam	*Independent Commissioner*
Komisaris Independen	Septian Hario Seto	*Independent Commissioner*
Komisaris Independen	Iman Sugema	*Independent Commissioner*
Komisaris Independen	Erwin Rijanto Slamet	*Independent Commissioner*
Komisaris	Askolani	*Commissioner*
Komisaris	Mohamad Yusuf Permana	*Commissioner*
Komisaris	Fadlansyah Lubis	*Commissioner*
Komisaris	Robertus Billitea	*Commissioner*

31 Desember 2024/*December 2024*

Direksi		***Board of Directors***
Direktur Utama	Royke Tumilaar	*President Director*
Wakil Direktur Utama	Putrama Wahju Setyawan	*Vice President Director*
Direktur *Finance*	Novita Widya Anggraini	*Managing Director - Finance*
Direktur *Wholesale & International Banking*	Agung Prabowo	*Managing Director - Wholesale & International Banking*
Direktur *Enterprise & Commercial Banking*	I Made Sukajaya	*Managing Director - Enterprise & Commercial Banking*
Direktur *Risk Management*	David Pirzada	*Managing Director - Risk Management*
Direktur *Institutional Banking*	Munadi Herlambang	*Managing Director - Institutional Banking*
Direktur *Network & Services*	Ronny Venir	*Managing Director - Network & Services*
Direktur *Digital & Integrated Transaction Banking*	Hussein Paolo Kartadjoemena	*Managing Director - Digital & Integrated Transaction Banking*
Direktur *Retail Banking*	Corina Leyla Karnalies	*Managing Director - Retail Banking*
Direktur *Technology & Operations*	Toto Prasetio	*Managing Director - Technology & Operation*
Direktur *Human Capital & Compliance*	Mucharom	*Managing Director - Human Capital & Compliance*

31 Desember 2024/*December 2024*

Komite Audit[*)]		***Audit Committee***[*)]
Ketua	Asmawi Syam	*Chairman*
Anggota	Sigit Widyawan	*Member*
Anggota	Iman Sugema	*Member*
Anggota	Human Brillianto	*Member*
Anggota	Suhendi Muharam	*Member*

*) Pembentukan Komite Audit Bank telah dilakukan sesuai dengan peraturan OJK No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.

*) *The formation of Audit Committee is in accordance with Financial Service Authority rule No. 55/POJK.04/2015 regarding the Establishment and Guidelines for the Work Implementation of the Audit Committee.*

Pada tanggal 31 Desember 2025 dan 2024, Sekretaris Perusahaan BNI adalah Okki Rushartomo Budiprabowo.

As of 31 December 2025 and 2024, BNI's Corporate Secretary is Okki Rushartomo Budiprabowo.

Jumlah pegawai BNI adalah sebagai berikut (tidak diaudit):

The number of employees of BNI is as follows (unaudited):

	Tetap/ *Permanent*	**Tidak tetap/ *Non-permanent***	**Total**	
31 Desember 2025	25,265	1,936	27,201	*31 December 2025*
31 Desember 2024	25,327	1,876	27,203	*31 December 2024*

1. INFORMASI UMUM (lanjutan)

i. Organisasi dan Struktur Manajemen (lanjutan)

Kantor pusat BNI berlokasi di Jl. Jend. Sudirman Kav. 1, Jakarta. Pada tanggal 31 Desember 2025, BNI memiliki 17 kantor wilayah, 197 kantor cabang, 1.085 kantor layanan serta 792 outlet lainnya (31 Desember 2024: 17 kantor wilayah, 197 kantor cabang, 1.089 kantor layanan serta 795 outlet lainnya) (tidak diaudit). Selain itu, BNI juga memiliki jaringan di luar negeri melalui 6 kantor cabang luar negeri yang berada di pusat keuangan dunia yaitu Singapura, Hong Kong, Tokyo, London, New York dan Seoul. Di samping itu, BNI juga memiliki 1 *sub-branch* di Osaka, 2 kantor perwakilan di Amsterdam dan Sydney serta 1 *Limited Purpose Branch* di Singapura.

***1. GENERAL INFORMATION** (continued)*

***i. Organizational and Management Structure** (continued)*

BNI's head office is located at Jl. Jend. Sudirman Kav. 1, Jakarta. As of 31 December 2025, BNI has 17 regional offices, 197 domestic branches, 1,085 sub-branches and 792 other outlets (31 December 2024: 17 regional offices, 197 domestic branches, 1,089 sub-branches and 798 other outlets) (unaudited). In addition, BNI has a presence in overseas through 6 overseas branches located in the global financial center located in Singapore, Hong Kong, Tokyo, London, New York and Seoul. Further than that, BNI also has 1 sub-branch in Osaka, 2 representative offices in Amsterdam and Sydney, and 1 Limited Purpose Branch in Singapore.

j. Entitas Anak

BNI mempunyai kepemilikan langsung pada Entitas Anak berikut:

j. Subsidiaries

BNI has direct ownership in the following Subsidiaries:

Nama Perusahaan/ *Company Name*	Kegiatan Usaha/ *Business Activity*	Tahun Mulai Beroperasi Komersial/ *Year Started Commercial Operations*	Persentase Kepemilikan/ *Percentage of Ownership*		Total Aset/ *Total Assets*	
			31 Desember/ *December* 2025	31 Desember/ *December* 2024	31 Desember/ *December* 2025	31 Desember/ *December* 2024
PT BNI Life Insurance	Asuransi jiwa/ *Life insurance*	1997	60.00%	60.00%	30,630,863	26,675,991
PT BNI Multifinance	Pembiayaan/ *Financing*	1983	99.99%	99.99%	5,610,370	6,075,604
PT BNI Sekuritas dan Entitas Anak/*and Subsidiaries*	Sekuritas/*Securities*	1995	75.00%	75.00%	2,848,933	2,052,447
BNI Remittance Ltd.	Jasa keuangan/ *Financial services*	1998	100.00%	100.00%	10,466	8,636
PT Bank Hibank Indonesia	Perbankan/*Banking*	1993	63.92%	63.92%	24,079,865	17,798,871
PT BNI Modal Ventura	Permodalan ventura/ *Venture capital*	2022	99.98%	99.98%	541,235	517,251

Semua Entitas Anak BNI berkedudukan di Jakarta, kecuali BNI Remittance Ltd. berkedudukan di Hong Kong.

All of the Subsidiaries of BNI are domiciled in Jakarta, except for BNI Remittance Ltd. which is domiciled in Hong Kong.

PT BNI Life Insurance ("BNI Life")

BNI Life pada awalnya didirikan dengan nama PT Asuransi Jiwa BNI Jiwasraya berdasarkan Akta Notaris No. 24 tanggal 28 November 1996. Pada tanggal 26 November 2004, PT Asuransi Jiwa BNI Jiwasraya telah mengubah nama menjadi PT BNI Life Insurance.

PT BNI Life Insurance ("BNI Life")

BNI Life was originally established under the name PT Asuransi Jiwa BNI Jiwasraya based on Notarial Deed No. 24 dated 28 November 1996. On 26 November 2004, PT Asuransi Jiwa BNI Jiwasraya changed its name to PT BNI Life Insurance.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Life Insurance ("BNI Life") (lanjutan)

Sesuai dengan Pasal 3 Anggaran Dasar BNI Life, ruang lingkup kegiatan BNI Life adalah menjalankan usaha-usaha dalam bidang asuransi jiwa termasuk usaha asuransi jiwa dengan prinsip syariah. BNI Life memperoleh izin usaha sebagai perusahaan asuransi jiwa berdasarkan Keputusan Menteri Keuangan Republik Indonesia No. Kep-305/KMK.017/1997 tanggal 7 Juli 1997.

Kantor pusat BNI Life berlokasi di Centennial Tower, Lantai 10 Jl. Gatot Subroto Kav. 24-25, Jakarta 12930. Pada tanggal 31 Desember 2025, BNI Life memiliki 11 kantor pemasaran dan 3 kantor pemasaran mandiri (31 Desember 2024: 14 kantor pemasaran dan 5 kantor pemasaran mandiri) yang tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki karyawan sebanyak 883 orang pada tanggal 31 Desember 2025 (31 Desember 2024: 897 karyawan) (tidak diaudit).

PT BNI Multifinance ("BNI Multifinance")

Sesuai dengan Pasal 3 Anggaran Dasar BNI Multifinance, ruang lingkup kegiatan BNI Multifinance adalah menjalankan kegiatan dalam bidang pembiayaan investasi, pembiayaan modal kerja, pembiayaan multi guna dan sewa operasi.

Anggaran Dasar BNI Multifinance telah mengalami beberapa kali perubahan. Perubahan terakhir Anggaran Dasar PT BNI Multifinance dilakukan antara lain tentang penyusunan kembali anggaran dasar sesuai dengan Akta Notaris No. 190 tanggal 30 Juni 2025 dari notaris I Gede Buda Gunamanta, S.H., dan telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-AH.01.03-0167699 tanggal 28 Juli 2024 dengan susunan pengurus terakhir berdasarkan Akta Pernyataan Keputusan Rapat Pemegang Saham PT BNI Multifinance No. 189 tanggal 30 Juni 2025 yang telah diterima dan dicatat oleh Menteri Hukum Dan Hak Asasi Manusia Republik Indonesia, berdasarkan Surat Nomor AHU-AH.01.09-0317133 tanggal 28 Juli 2025.

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

***PT BNI Life Insurance ("BNI Life")** (continued)*

In accordance with Article 3 of BNI Life's Articles of Association, the scope of BNI Life's activities is to engage in life insurance business including life insurance business under sharia principle. BNI Life obtained its operating license as a life insurance company based on the Minister of Finance of the Republic of Indonesia Decree No. Kep-305/KMK.017/1997 dated 7 July 1997.

BNI Life's head office is located in Centennial Tower, 10th floor Jl. Gatot Subroto Kav. 24-25, Jakarta 12930. As of 31 December 2025, BNI Life has 11 marketing offices and 3 personal marketing offices (31 December 2024: 14 marketing offices and 5 personal marketing offices) located in various cities in Indonesia (unaudited) and has 883 employees as of 31 December 2025 (31 December 2024: 897 employees) (unaudited).

PT BNI Multifinance ("BNI Multifinance")

In accordance with Article 3 of BNI Multifinance's Articles of Association, the scope of the BNI Multifinance's activities involves investment financing, working capital financing, multipurpose financing and operating lease.

BNI Multifinance's Articles of Association has been amended several times. The latest amendment of PT BNI Multifinance's Articles of Association was made regarding rearrangement of the BNI Multifinance's Articles of Association based on Notarial Deed No. 190 dated 30 June 2025 of notary I Gede Buda Gunamanta, S.H., and has been approved by the Minister of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter Keputusan No. AHU-AH.01.03-0167699 dated 28 July 2024, with the latest management structure based on the Shareholders' Meeting Resolution Deed of PT BNI Multifinance No. 189 dated 30 June 2025, which has been received and registered by the Minister of Law and Human Rights of the Republic of Indonesia, as confirmed by Letter No. AHU-AH.01.09-0317133 dated 28 July 2025.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Multifinance ("BNI Multifinance") (lanjutan)

Kantor pusat BNI Multifinance berlokasi di Gedung Graha Binakarsa, Lantai 11 Lot. E-F dan lantai 12, Jl. HR Rasuna Said, Kav. C-18 Kuningan, Jakarta Selatan 12940. Pada tanggal 31 Desember 2025, BNI Multifinance memiliki 52 outlet cabang (31 Desember 2024: 52 outlet cabang) tersebar di beberapa kota di Indonesia (tidak diaudit) dan memiliki 695 dan 835 karyawan masing-masing pada tanggal 31 Desember 2025 (tidak diaudit) dan 31 Desember 2024 (tidak diaudit).

PT BNI Sekuritas ("BNI Sekuritas") dan Entitas Anak

BNI Sekuritas didirikan berdasarkan Akta Notaris No. 22 tanggal 12 April 1995 dari Koesbiono Sarmanhadi, S.H., di Jakarta. Akta tersebut kemudian diubah dengan Akta Notaris No. 39 dari notaris yang sama tanggal 3 Mei 1995. Akta pendirian dan perubahannya disahkan oleh Menteri Kehakiman Republik Indonesia dalam Surat Keputusan No. C2-6278.HT.01.01.Th.95 tanggal 19 Mei 1995, serta diumumkan dalam Berita Negara Republik Indonesia No. 55, Tambahan No. 5804 tanggal 11 Juli 1995.

Berdasarkan Pasal 3 dari Anggaran Dasar BNI Sekuritas, ruang lingkup kegiatan usahanya meliputi perdagangan efek, termasuk di dalamnya bertindak sebagai penjamin dan penasehat investasi dan kegiatan lain yang berhubungan dengan kegiatan tersebut dengan memperhatikan peraturan Otoritas Jasa Keuangan (OJK), dahulu Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) dan peraturan perundang-undangan lain yang berlaku.

BNI Sekuritas memiliki 99,90% dari jumlah saham PT BNI Asset Management ("BNI Asset Management"), Entitas Anak yang didirikan tanggal 28 Maret 2011 dan bergerak di bidang manajemen dan penasehat investasi.

1. GENERAL INFORMATION *(continued)*

j. Subsidiaries *(continued)*

PT BNI Multifinance ("BNI Multifinance") *(continued)*

BNI Multifinance head office is located in Gedung Graha Binakarsa, 11th Lot E-F and 12th floor, Jl. HR Rasuna Said, Kav. C-18 Kuningan, South Jakarta 12940. As of 31 December 2025, BNI Multifinance has 52 branches (31 December 2024: 52 branches) located in various cities in Indonesia (unaudited) and had 695 and 835 employees as of 31 December 2025 (unaudited) and 31 December 2024 (unaudited).

PT BNI Sekuritas ("BNI Sekuritas") and Subsidiaries

BNI Sekuritas was established by virtue of Notarial Deed No. 22 dated 12 April 1995 of Koesbiono Sarmanhadi, S.H., in Jakarta. The deed was amended by Notarial Deed No. 39 dated 3 May 1995 of the same notary. The Deed of Establishment and amendment thereon were approved by the Decision Letter of the Minister of Justice of the Republic of Indonesia No. C2-6278.HT.01.01.Th.95 dated 19 May 1995 and was published in the State Gazette No. 55, Supplement No. 5804 dated 11 July 1995.

In accordance with Article 3 of BNI Sekuritas' Articles of Association, the scope of its business activities comprises of securities trading, including investment underwriting and advisory investment and other related activities allowed by Financial Service Authority (OJK), previously the Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) and other regulations.

BNI Sekuritas owns 99.90% of the total share capital of PT BNI Asset Management ("BNI Asset Management"), a Subsidiary established on 28 March 2011 and engaged in investment management and advisory activities.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Sekuritas ("BNI Sekuritas") dan Entitas Anak (lanjutan)

BNI Sekuritas memiliki 100,00% dari jumlah saham BNI Securities Pte. Ltd. ("BSPL") yang didirikan pada tanggal 22 Maret 2021 dan telah mendapat izin dari *Monetary Authority Singapore* (MAS) pada tanggal 8 Desember 2021.

Kantor pusat BNI Sekuritas berlokasi di Sudirman Plaza Indofood Tower, lantai 16, Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia. Pada tanggal 31 Desember 2025, Perusahaan memiliki 16 outlet cabang yang tersebar di beberapa kota di Indonesia (2024: 16 outlet cabang) (tidak diaudit). Perusahaan memiliki karyawan sebanyak 345 dan 346 orang masing-masing pada tanggal 31 Desember 2025 dan 2024 (tidak diaudit).

BNI Remittance Ltd. (dahulu BNI Nakertrans)

BNI Remittance Ltd. telah menambah modalnya sebesar HKD7.434.944 (nilai penuh) setara dengan Rp10.000 pada tanggal 11 Juni 2009 yang dicatat menggunakan metode biaya. Kantor pusat BNI Remittance Ltd. berada di Causeway Bay, Hong Kong dan memiliki karyawan sebanyak 6 orang pada tanggal 31 Desember 2025 dan 2024 (tidak diaudit).

PT Bank Hibank Indonesia (dahulu PT Bank Mayora)

PT Bank Mayora didirikan pada tahun 1993 berdasarkan Akta No. 14 tanggal 25 Februari 1993 dari Dr. Widjojo Wilami, S.H., notaris di Jakarta. Akta pendirian ini telah mendapat pengesahan dari Menteri Kehakiman Republik Indonesia melalui Surat Keputusannya No. C2-2108.HT.01.01.Th.1993 tanggal 10 April 1993 serta diumumkan dalam Berita Negara Republik Indonesia No. 44, tanggal 2 Juni 1993, Tambahan No. 2457. Anggaran dasar PT Bank Hibank Indonesia telah mengalami beberapa kali perubahan, yang mana perubahan terakhir anggaran dasar PT Bank Hibank Indonesia dilakukan terkait pernyataan kembali seluruh anggaran dasar PT Bank Hibank Indonesia sesuai dengan Akta No. 02 tanggal 1 Juli 2025 yang diterbitkan oleh P. Suandi Halim, SH, notaris di Jakarta dan telah diterima oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia, dengan Surat Keputusan No. AHU-AH.01.03-0171809 tertanggal 2 Juli 2025 perihal penerimaan pemberitahuan perubahan data perseroan.

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

***PT BNI Sekuritas ("BNI Sekuritas") and Subsidiaries** (continued)*

BNI Sekuritas owns 100.00% of the total share capital of BNI Securities Pte. Ltd. ("BSPL") which was established on 22 March 2021 and had obtained licensed issued by Monetary Authority Singapore (MAS) on 8 December 2021.

BNI Sekuritas' head office is located in Sudirman Plaza Indofood Tower, 16th floor, Jl. Jenderal Sudirman Kav. 76-78, Jakarta 12910, Indonesia. As of 31 December 2025, the Company has 16 outlets located in various cities in Indonesia (2024: 16 outlets) (unaudited). The Company has 345 and 346 employees as of 31 December 2025 and 2024, respectively (unaudited).

BNI Remittance Ltd. (formerly BNI Nakertrans)

On 11 June 2009, BNI Remittance Ltd. increased its capital by HKD7,434,944 (full amount) equivalent to Rp10,000, which was recorded using the cost method. The main office of BNI Remittance Ltd. is located in Causeway Bay, Hong Kong and has 6 employees as of 31 December 2025 and 2024, respectively (unaudited).

PT Bank Hibank Indonesia (formerly PT Bank Mayora)

PT Bank Mayora was established in 1993 based on Notarial Deed No. 14 dated 25 February 1993 of Dr. Widjojo Wilami, S.H., public notary in Jakarta. The Deed of Establishment was approved by the Minister of Justice of the Republic of Indonesia in his Decision Letter No. C2-2108.HT.01.01. Th.1993 dated 10 April 1993 and published in the State Gazette of the Republic of Indonesia No. 44 dated 2 June 1993, Supplement No. 2457. The Articles of association of PT Bank Hibank Indonesia has been amended several times, with the latest amendment of the articles of association of PT Bank Hibank Indonesia was made regarding changes of articles of association of PT Bank Hibank Indonesia based on Deed No. 02 dated 1 July 2025 issued by P. Suandi Halim, S.H., a public notary in Jakarta and has been accepted by the Minister of Laws and Human Rights of the Republic of Indonesia, in its Decision Letter No. AHU-AH.01.03-0171809 dated 2 July 2025 regarding acceptance of changes of articles of association.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT Bank Hibank Indonesia (dahulu PT Bank Mayora) (lanjutan)

PT Bank Hibank Indonesia tergabung dalam Kelompok Usaha Bank (KUB) BNI sebagaimana penegasan terhadap rencana pembentukan KUB BNI yang disampaikan oleh Otoritas Jasa Keuangan cfm. Surat OJK No. S-83/PB.31/2022 tanggal 23 Mei 2022 dan menjadi bagian dari anggota Lembaga Jasa Keuangan Konglomerasi Keuangan BNI sebagaimana telah dicatat dalam administrasi pengawasan OJK cfm. Surat OJK No. S-88/PB.31/2022 tanggal 9 Juni 2022.

Sesuai dengan Surat Keputusan Bank Indonesia No. 15/5/KEP.DpG/2013 tanggal 7 Mei 2013, Bank memperoleh peningkatan status menjadi Bank Devisa.

Kantor pusat PT Bank Hibank Indonesia berlokasi di Jakarta dengan alamat di Rajawali Place Lantai 22-23, Jl. H. R. Rasuna Said No. Kav. B, RW.4, Setiabudi, Kecamatan Setiabudi, Kota Jakarta Selatan, Daerah Khusus Ibukota Jakarta 12910. Pada tanggal 31 Desember 2025, Hibank memiliki 6 kantor cabang, 18 kantor cabang pembantu dan 1 KP non operasional (tidak diaudit) (31 Desember 2024: 4 kantor cabang, 22 kantor cabang pembantu, dan 1 KP non operasional) serta memiliki karyawan sebanyak 527 orang pada tanggal 31 Desember 2025 (31 Desember 2024: 548 orang) (tidak diaudit).

PT BNI Modal Ventura (''BNI Ventures'')

BNI Ventures didirikan pada tahun 2022 berdasarkan Akta No. 17 tanggal 12 April 2022 dari Ariani L. Rachim, notaris di Jakarta. Akta pendirian ini telah mendapatkan pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia yang tertuang dalam Surat No. AHU-0027437.AH.01.01.TAHUN 2022 tanggal 19 April 2022 serta diumumkan dalam Berita Negara Republik Indonesia No. 032 Tambahan Berita Negara RI No. 014450 tanggal 22 April 2022.

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

***PT Bank Hibank Indonesia (formerly PT Bank Mayora)** (continued)*

PT Bank Hibank Indonesia incorporated in the BNI Bank Business Group (KUB) as an affirmation of the plan to establish a BNI KUB by the Financial Services Authority (OJK) confirmed by OJK Letter No. S-83/PB.31/2022 dated 23 May 2022 and became a Financial Services Institution member of the BNI Financial Conglomerate as recorded in the OJK supervision administration confirmed by OJK Letter No. S-88/PB.31/2022 dated 9 June 2022.

In accordance with the Decree of Bank Indonesia No. 15/5/KEP.DpG/2013 dated 7 May 2013, the Bank was authorised to operate as a Foreign Exchange Bank.

PT Bank Hibank Indonesia head office is located in Jakarta, Rajawali Place Lantai 22-23, Jl. H. R. Rasuna Said No. Kav. B, RW.4, Setiabudi, Kecamatan Setiabudi, South Jakarta, Daerah Khusus Ibukota Jakarta 12910. As of 31 December 2025, Hibank has 6 branches, 18 sub-branches and 1 other outlets (unaudited) (31 December 2024: 4 branches, 22 sub-branches, and 1 other outlets) and has 527 employees as of 31 December 2025 (31 December 2024: 548 employees) (unaudited).

PT BNI Modal Ventura (''BNI Ventures'')

BNI Ventures was established in 2022 based on Deed No. 17 dated 12 April 2022 from Ariani L. Rachim, a notary in Jakarta. This deed of establishment has been approved by the Minister of Law and Human Rights of the Republic of Indonesia as stated in Letter No. AHU-0027437.AH.01.01.TAHUN 2022 dated 19 April 2022 and announced in the State Gazette of the Republic of Indonesia No. 032 Supplement to the State Gazette of the Republic of Indonesia No. 014450 dated 22 April 2022.

1. INFORMASI UMUM (lanjutan)

j. Entitas Anak (lanjutan)

PT BNI Modal Ventura (''BNI Ventures'') (lanjutan)

Berdasarkan Pasal 3 dari Anggaran Dasar BNI Ventures, ruang lingkup kegiatan usahanya mencakup usaha modal ventura yang diselenggarakan secara konvensional, dengan kegiatan usaha meliputi penyertaan saham (*equity participation*), penyertaan melalui pembelian obligasi (*quasi equity participation*), pembiayaan melalui pembelian surat utang yang diterbitkan pasangan usaha pada tahap rintisan awal (*startup*) dan/atau pengembangan usaha, dan/atau pembiayaan usaha produktif. Dalam melakukan kegiatan usahanya, BNI Ventures dapat mengelola dana ventura. Selain usaha modal ventura, BNI Ventures juga dapat menyelenggarakan kegiatan usaha lain yaitu kegiatan jasa berbasis *fee* dan/atau kegiatan usaha lain dengan persetujuan Otoritas Jasa Keuangan (OJK). BNI Ventures telah mendapatkan izin usaha dari OJK pada tanggal 27 Januari 2023.

Kantor pusat BNI Ventures berlokasi di Jakarta dengan alamat di Menara BNI Lt. 2, Jl. Pejompongan Raya No. 7, Tanah Abang, Jakarta Pusat. BNI Ventures memiliki karyawan sebanyak 16 orang masing-masing pada tanggal 31 Desember 2025 dan 2024 (tidak diaudit).

k. Entitas Asosiasi

PT Bank Syariah Indonesia Tbk

BNI Syariah didirikan dengan Akta Pendirian No. 160 tanggal 22 Maret 2010 yang dibuat di hadapan Aulia Taufani, S.H., sebagai Pengganti Sutjipto, S.H., notaris di Jakarta. Akta Pendirian tersebut telah memperoleh pengesahan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui Surat No. AHU-15574.AH.01.01.Tahun 2010 tanggal 25 Maret 2010.

Sejak tanggal 1 Februari 2021, BNI Syariah telah resmi bergabung ke PT Bank Syariah Indonesia Tbk sesuai persetujuan Otoritas Jasa Keuangan (OJK) Pasar Modal melalui surat No. S-289/D.04/2020 tertanggal 11 Desember 2020 serta melalui surat OJK Perbankan No. 4/KDK.03/2021 tanggal 27 Januari 2021.

***1. GENERAL INFORMATION** (continued)*

***j. Subsidiaries** (continued)*

***PT BNI Modal Ventura (''BNI Ventures'')** (continued)*

Based on Article 3 of the Articles of Association of BNI Ventures, the scope of its business activities includes conventional venture capital ventures, with business activities including equity participation, equity participation through the purchase of bonds (quasi equity participation), financing through the purchase of issued debt securities by business partners at the initial startup stage and/or business development, and/or productive business financing. In carrying out its business activities, the BNI Ventures can manage venture funds. In addition to venture capital businesses, BNI Ventures can also carry out other business activities, namely fee-based service activities and/or other business activities with the approval of the Financial Services Authority (OJK). BNI Ventures has obtained a business license from OJK on 27 January 2023.

BNI Ventures head office is located in Jakarta, at Menara BNI Lt. 2, Jl. Pejompongan Raya No. 7, Tanah Abang, Central Jakarta. BNI Ventures had 16 employees as of 31 December 2025 and 2024 (unaudited).

k. Associates

PT Bank Syariah Indonesia Tbk

BNI Syariah was established based on Establishment Deed No. 160 dated 22 March 2010 which was notarised by Aulia Taufani, S.H., as the substitute of Sutjipto, S.H., notary in Jakarta. The Establishment Deed was approved by the Ministry of Laws and Human Rights of the Republic of Indonesia through Letter No. AHU-15574.AH.01.01.Year 2010 dated 25 March 2010.

Since 1 February 2021, BNI Syariah has officially joined PT Bank Syariah Indonesia Tbk as approved by The Financial Service Authority (OJK) Capital Market through letter No. S-289/D.04/2020 dated 11 December 2020 as well as through OJK Perbankan through letter No. 4/KDK.03/2021 dated 27 January 2021.

1. INFORMASI UMUM (lanjutan)

k. Entitas Asosiasi (lanjutan)

PT Bank Syariah Indonesia Tbk (lanjutan)

Dengan bergabungnya BNI Syariah ke PT Bank Syariah Indonesia Tbk, maka pengendalian BNI terhadap BNI Syariah telah berakhir dan tidak dilakukan konsolidasi atas laporan keuangan PT Bank Syariah Indonesia Tbk pada laporan keuangan konsolidasian BNI dan Entitas Anak.

Sejak 1 Februari 2021, Penyertaan BNI terhadap PT Bank Syariah Indonesia Tbk dianggap sebagai penyertaan terhadap perusahaan asosiasi dengan pengaruh signifikan yang dicatat menggunakan metode ekuitas.

***1. GENERAL INFORMATION** (continued)*

***k. Associates** (continued)*

***PT Bank Syariah Indonesia Tbk** (continued)*

By joining BNI Syariah to PT Bank Syariah Indonesia Tbk, BNI's control of BNI Syariah has ended and there is no consolidation of the financial statements of PT Bank Syariah Indonesia Tbk in the consolidated financial statements of BNI and its Subsidiaries.

Since 1 February 2021, BNI's participation in PT Bank Syariah Indonesia Tbk is considered as participation in associated companies with significant influence which is recorded using the equity method.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL

Laporan keuangan konsolidasian BNI dan Entitas Anak ("Grup") ini diselesaikan dan diotorisasi untuk terbit oleh Direksi pada tanggal 2 Februari 2026.

Kebijakan akuntansi material yang diterapkan dalam penyusunan laporan keuangan konsolidasian BNI dan Entitas Anak ("Grup") adalah seperti dijabarkan di bawah ini:

a. Dasar penyusunan laporan keuangan konsolidasian

Berikut ini adalah ikhtisar kebijakan akuntansi material yang diterapkan dalam penyusunan laporan keuangan konsolidasian Grup yang disusun berdasarkan Standar Akuntansi Keuangan di Indonesia yang mencakup Pernyataan Standar Akuntansi Keuangan ("PSAK") dan Interpretasi Standar Akuntansi Keuangan ("ISAK") yang diterbitkan oleh Ikatan Akuntan Indonesia dan Peraturan No. VIII.G.7 tentang Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik, yang terlampir dalam surat keputusan No. KEP-347/BL/2012. Peraturan tersebut sekarang merupakan regulasi dari Otoritas Jasa Keuangan ("OJK").

2. MATERIAL ACCOUNTING POLICY INFORMATION

The consolidated financial statements of BNI and its Subsidiaries ("Group") were completed and authorised for issuance by the Board of Directors on 2 February 2026.

The material accounting policies adopted in preparing the consolidated financial statements of BNI and Subsidiaries ("Group") are set out below:

a. Basis of preparation of the consolidated financial statements

Presented below are the summary of material accounting policies applied in the preparation of the consolidated financial statements of the Group in accordance with Indonesian Financial Accounting Standards which comprise of Statements of Financial Accounting Standards ("SFAS") and Interpretation of Financial Accounting Standards ("ISFAS") issued by Institute of Indonesian Chartered Accountant and Regulation No. VIII.G.7 regarding the Presentations and Disclosures of Financial Statements of Listed Entity, enclosed in the decision letter No. KEP-347/BL/2012. The regulation is now a regulation under Indonesian Financial Services Authority ("OJK").

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

a. Dasar penyusunan laporan keuangan konsolidasian (lanjutan)

Laporan keuangan konsolidasian disusun sesuai dengan PSAK 201, "Penyajian Laporan Keuangan".

Laporan keuangan konsolidasian telah disajikan berdasarkan konsep harga perolehan, yang dimodifikasi oleh revaluasi tanah dan bangunan, aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, aset dan liabilitas keuangan (termasuk instrumen derivatif) yang diukur pada nilai wajar melalui laba rugi, serta disusun dengan dasar akrual, kecuali laporan arus kas konsolidasian.

Laporan arus kas konsolidasian disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi dan pendanaan. Kas dan setara kas terdiri dari kas, giro pada Bank Indonesia dan giro pada bank lain, penempatan pada bank lain dan Sertifikat Bank Indonesia yang jatuh tempo dalam waktu 3 bulan atau kurang sejak tanggal perolehan, sepanjang tidak digunakan sebagai jaminan atas pinjaman yang diterima serta tidak dibatasi penggunaannya.

Pos-pos dalam penghasilan komprehensif lainnya disajikan terpisah antara akun-akun yang akan direklasifikasikan ke laba rugi dan akun-akun yang tidak akan direklasifikasikan ke laba rugi.

Mata uang pelaporan yang digunakan dalam laporan keuangan konsolidasian adalah mata uang Rupiah (Rp). Angka-angka yang disajikan dalam laporan keuangan konsolidasian, kecuali bila dinyatakan secara khusus, adalah dibulatkan dalam jutaan Rupiah.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***a. Basis of preparation of the consolidated financial statements** (continued)*

The consolidated financial statements are prepared in accordance with SFAS 201, "Presentation of Financial Statements".

The consolidated financial statements have been prepared on a historical cost basis, as modified by revaluation of land and buildings, financial assets at fair value through other comprehensive income, financial assets and liabilities (including derivative instruments) at fair value through profit or loss, and under the accrual basis of accounting, except for consolidated statements of cash flows.

The consolidated statements of cash flows are prepared in the direct method with cash flows classified into operating, investing and financing activities. Cash and cash equivalents consist of cash, current accounts with Bank Indonesia and current accounts with other banks, placements with other banks and Certificates of Bank Indonesia maturing within 3 months from the date of acquisition, and which are not pledged as collateral for borrowings nor restricted.

Items within other comprehensive income are classified separately, between accounts which will be reclassified to profit or loss and which will not be reclassified to profit or loss.

The reporting currency used for the consolidated financial statements is the Indonesian Rupiah (Rp). Unless otherwise stated, all figures presented in the consolidated financial statements are rounded off to millions of Rupiah.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan

Berikut ini adalah standar akuntansi keuangan, perubahan dan interpretasi standar akuntansi keuangan yang berlaku efektif sejak 1 Januari 2025.

- PSAK 117: "Kontrak Asuransi";
- Amendemen PSAK 117: "Kontrak Asuransi" terkait Penerapan Awal PSAK 117 dan PSAK 109 - Informasi Komparatif; dan
- Amendemen PSAK 221: "Pengaruh Perubahan Kurs Valuta Asing" terkait kondisi ketika suatu mata uang tidak tertukarkan.

PSAK 117: "Kontrak Asuransi"

Grup menerapkan PSAK 117 untuk kontrak asuransi dan kontrak reasuransi yang dimiliki oleh Grup. Kontrak asuransi adalah kontrak di mana Grup menerima risiko asuransi yang signifikan dari pemegang polis, di mana hal tersebut dapat menyebabkan Grup membayar jumlah tambahan yang signifikan dalam skenario tunggal dengan substansi komersial. Perhitungan atas liabilitas kontrak akuntansi didasarkan pada kelompok kontrak asuransi dan akan mencakup arus kas pemenuhan, serta margin layanan kontraktual (CSM), yang merupakan laba yang belum diperoleh.

PSAK 117 menentukan prinsip-prinsip untuk pengakuan, pengukuran, penyajian, dan pengungkapan kontrak asuransi serta menggantikan PSAK 104 "Kontrak Asuransi" yang berlaku sebelumnya.

Dalam PSAK 117, ada tiga model pengukuran baru yang diperkenalkan, yang terdiri dari *General Measurement Model* (GMM), *Variable Fee Approach* (VFA), dan *Premium Allocation Approach* (PAA).

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards

The followings are financial accounting standard, amendments and interpretation of financial accounting standard which become effective starting 1 January 2025.

- *SFAS 117: "Insurance Contract";*
- *Amendment of SFAS 117: "Insurance Contract" regarding Initial Application of SFAS 117 and SFAS 109 - Comparative Information; and*
- *Amendment of SFAS 221: "The Effect of Changes in Foreign Exchange Rates" regarding to conditions when a currency is not exchangeable.*

SFAS 117: "Insurance Contract"

The Group applies SFAS 117 to insurance contracts and reinsurance contracts held by the Group. Insurance contracts are contracts under which the Group accepts significant insurance risk from policyholder, where it can cause the Group to pay significant additional amounts in any single scenario with commercial substance. The measurement of insurance contract liabilities is based on groups of insurance contracts and includes the fulfilment cash flows as well as the Contractual Service Margin (CSM), which represents unearned profit.

SFAS 117 defines principles for the recognition, measurement, presentation and disclosure of insurance contracts and supersedes the SFAS 104 "Insurance Contracts".

In SFAS 117, there are three new measurement models introduced under, consisting of the General Measurement Model (GMM), Variable Fee Approach (VFA), and Premium Allocation Approach (PAA).

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: "Kontrak Asuransi" (lanjutan)

Grup menerapkan pendekatan secara retrospektif penuh untuk kontrak asuransi yang dibuat pada tahun 2022 hingga 2023 dan pendekatan nilai wajar untuk kontrak asuransi yang dibuat pada tahun 2021 dan sebelumnya

PSAK 117 mengharuskan pemisahan derivatif melekat, komponen investasi, dan kewajiban pelaksanaan untuk menyediakan barang dan jasa non-asuransi, jika kondisi tertentu terpenuhi. Komponen yang dipisahkan perlu dicatat secara terpisah sesuai dengan PSAK 109 Instrumen Keuangan (derivatif melekat dan komponen investasi) atau PSAK 115 (barang dan jasa non-asuransi). Pengukuran tidak dilakukan pada tingkat kontrak individu, tetapi berdasarkan kelompok kontrak. Untuk mengalokasikan kontrak asuransi individu ke dalam kelompok kontrak, suatu entitas pertama-tama perlu mendefinisikan portofolio yang mencakup kontrak dengan risiko serupa yang dikelola bersama.

Dampak penerapan awal PSAK 117 mencakup hal-hal berikut:

- Perubahan kebijakan akuntasi sebagai dampak dari penerapan PSAK 117 harus menerapkan pendekatan retrospektif penuh sejauh yang dapat dilaksanakan. Grup dapat menerapkan pendekatan retrospektif yang dimodifikasi dan pendekatan nilai wajar apabila pendekatan retrospektif penuh tidak dapat dilaksanakan dalam menentukan jumlah transisi pada tanggal transisi.
- Standar ini memperkenalkan diskonto wajib atas cadangan kerugian, transparansi yang lebih tinggi atas portofolio merugi yang disebabkan oleh pengujian kontrak yang lebih rinci, dan pengenalan penyesuaian risiko untuk risiko non-finansial yang serupa dengan Provision of Risk Margin for Adverse Deviation (PAD) pada liabilitas klaim di PSAK 104. Standar tersebut mengharuskan tingkat diskonto ditentukan menggunakan data pasar yang dapat diobservasi berdasarkan kurva dasar bebas risiko dan penyesuaian khusus portofolio untuk mencerminkan tidak likuidnya liabilitas asuransi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

SFAS 117: "Insurance Contract" (continued)

The Group applies the full retrospective approach for insurance contracts issued during 2022 and 2023, and the fair value approach for insurance contracts issued in 2021 and prior periods.

SFAS 117 requires the separation of embedded derivatives, investment components, and performance obligations to provide non-insurance goods and services, if certain conditions are met. The separated components need to be accounted for separately according to SFAS 109 Financial Instruments (embedded derivatives and investment components) or SFAS 115 (non-insurance goods and services). Measurement is not carried out at the level of individual contracts, but on the basis of groups of contracts. To allocate individual insurance contracts to groups of contracts, an entity first needs to define portfolios which include contracts with similar risks that are managed together.

The impact of initial application of SFAS 117 include the following:

- *Changes in accounting policies resulting from the adoption of SFAS 117 shall apply with full retrospective approach to the extent practicable. The Company adopts the modified retrospective approach or fair value approach when it is impracticable to use a full retrospective approach in determining transition amounts at the SFAS transition date..*
- *The standard introduces mandatory discounting of loss reserves, higher transparency of loss-making portfolios due to more granular onerous contract testing, and the introduction of risk adjustment for non-financial risk which is similar to the Provision of Risk Margin for Adverse Deviation (PAD) in SFAS 104 for claim liabilities. The standard requires the discount rates to be determined using observable market data based on a risk-free base curve and portfolio specific adjustments to reflect the illiquidity of insurance liabilities.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

PSAK 117: "Kontrak Asuransi" (lanjutan)

Dampak penerapan awal PSAK 117 mencakup hal-hal berikut: (lanjutan)

- PSAK 117 mengharuskan kerugian yang diharapkan selama masa berlaku kontrak untuk tercermin pada pengakuan awal dalam laporan laba rugi dan laporan posisi keuangan sebagai komponen kerugian.

- Laporan posisi keuangan konsolidasian dan laporan laba rugi konsolidasian akan disajikan secara substansial berbeda dari penyajian berdasarkan PSAK 104, seperti:

  i. Dalam laporan posisi keuangan konsolidasian, biaya akuisisi yang ditangguhkan tidak akan lagi disajikan di dalam pos-pos yang terpisah tetapi sebagai bagian dari kewajiban asuransi. Hal tersebut menunjukkan bahwa biaya akuisisi yang ditangguhkan tidak dipertimbangkan secara individual tetapi diperhitungkan dalam pengukuran keseluruhan kewajiban asuransi.

  ii. Jumlah yang disajikan dalam laporan laba rugi konsolidasian perlu dipisahkan menjadi hasil jasa asuransi, yang terdiri dari pendapatan asuransi dan beban jasa asuransi, dan pendapatan dan beban keuangan asuransi.

Grup telah mengkaji dampak dari penerapan PSAK 117 sebagaimana dijabarkan di bawah ini:

Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia ("DSAK-IAI") telah menerbitkan standar baru sebagai berikut:

- Amendemen PSAK 109: "Instrumen Keuangan" dan PSAK 107: "Instrumen Keuangan: Pengungkapan";
- PSAK 338: "Kombinasi Bisnis Entitas Sepengendali" (Revisi 2025).

Standar-standar tersebut akan berlaku efektif pada 1 Januari 2026.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

SFAS 117: "Insurance Contract" (continued)

The impact of initial application of SFAS 117 include the following: (continued)

- *SFAS 117 requires expected losses over a contract's lifetime to be reflected at initial recognition in the statement of profit or loss and the statement of financial position as a loss component.*

- *Consolidated statement of financial position and consolidated statement of profit or loss will be presented substantially different from the presentation under SFAS 104, such as:*

  i. In the consolidated statement of financial position, deferred acquisition costs will no longer be presented in separate line items but as part of the insurance liabilities. This represents that it is not individually considered but are instead factored into overall measurement of the insurance liabilities.

  ii. The amounts presented in the consolidated statement of profit or loss need to be disaggregated into an insurance service result, consisting of the insurance revenue and insurance service expenses, and insurance finance income and expenses.

The Group has assessed the impact of SFAS 117 implementation as set out below:

Financial Accounting Standard Board of Indonesian Institute of Accountants ("DSAK-IAI") has issued the following new standards, as follows:
- *Amendment of SFAS 109: "Financial Instruments" and SFAS 107: "Financial Instruments: Disclosures";*
- *SFAS 338: "Business Combinations of Entities Under Common Control" (Revised 2025).*

The above standards will be effective on 1 January 2026.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

b. Perubahan Pernyataan Standar Akuntansi Keuangan dan Interpretasi Standar Akuntansi Keuangan (lanjutan)

Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia ("DSAK-IAI") telah menerbitkan standar baru sebagai berikut: (lanjutan)

- PSAK 118: "Penyajian dan Pengungkapan dalam Laporan Keuangan" yang akan menggantikan PSAK 201: "Penyajian Laporan Keuangan"

Standar tersebut akan berlaku efektif pada 1 Januari 2027 dan penerapan dini diperbolehkan.

PSAK 118: "Penyajian dan Pengungkapan dalam Laporan Keuangan"

PSAK 118 menggantikan PSAK 201, mempertahankan banyak prinsip yang ada tetapi secara signifikan mengubah cara entitas melaporkan "laba atau rugi operasional." PSAK ini menetapkan struktur yang jelas untuk laporan laba rugi dengan mengelompokkan pos-pos ke dalam kategori operasi, investasi, pembiayaan, pajak penghasilan, dan operasi yang dihentikan. Standar ini mewajibkan pengungkapan tertentu, termasuk ukuran kinerja tetapan manajemen (UKTM), yang memungkinkan investor memahami bagaimana pandangan manajemen atas kinerja keuangan Grup dan bagaimana ukuran tersebut dibandingkan dengan ukuran yang didefinisikan dalam PSAK 118.

Meskipun PSAK 118 tidak memengaruhi pengakuan atau pengukuran pos-pos dalam laporan keuangan, dampaknya terhadap penyajian dan pengungkapan diperkirakan akan sangat luas, terutama yang berkaitan dengan laporan kinerja keuangan dan penyediaan UKTM dalam laporan keuangan.

Pada tanggal 31 Desember 2025, Grup sedang mengevaluasi dampak yang mungkin timbul dari penerapan amandemen standar-standar di atas, yang telah diterbitkan namun belum berlaku, pada laporan keuangan konsolidasian Grup terutama perbedaan nilai tukar yang saat ini digabungkan dalam laba operasi mungkin perlu dipisahkan, persyaratan khusus mengenai kategori di mana keuntungan atau kerugian derivatif diakui, pengungkapan baru yang signifikan yang diwajibkan dan dampak potensial lainnya atas penerapan standar baru ini terhadap laporan keuangan konsolidasian Grup.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***b. Changes to Statements of Financial Accounting Standards and Interpretations of Statements of Financial Accounting Standards** (continued)*

Financial Accounting Standard Board of Indonesian Institute of Accountants ("DSAK-IAI") has issued the following new standards, as follows: (continued)

- *SFAS 118: "Presentation and Disclosure in Financial Statements" which will replace SFAS 201: "Presentation in Financial Statements"*

The above standard will be effective on 1 January 2027 and early adoption is permitted.

SFAS 118: "Presentation and Disclosure in Financial Statements"

SFAS 118 supersedes SFAS 201, retaining many existing principles but significantly changing how entities report "operating profit or loss." It establishes a defined structure for the statement of profit or loss, categorising items into operating, investing, financing, income taxes and discontinued operations. The standard mandates specific disclosures, including management-defined performance measures (MPMs), allowing investors to understand management's view of the Group's financial performance and how these measures compare to those defined in SFAS 118.

Even though SFAS 118 will not impact the recognition or measurement of items in the financial statements, its impacts on presentation and disclosure are expected to be pervasive, in particular those related to the statement of financial performance and providing MPM within the financial statements.

As at 31 December 2025, the Group is still evaluating the potential impact of the implementation of above standards amendment issued, but not yet effective, on the Group's consolidated financial statements in particular foreign exchange differences currently in operating profit might need to be disaggregated, specific requirements on the category in which derivative gains or losses are recognised, significant new disclosures required and following potential impacts of the implementation of these standards on the Group consolidated financial statements.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan

(i) Klasifikasi

Grup mengklasifikasikan aset keuangannya berdasarkan kategori sebagai berikut pada saat pengakuan awal:
- Aset keuangan yang diukur pada nilai wajar melalui laba rugi;
- Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain;
- Aset keuangan yang diukur pada biaya perolehan diamortisasi.

Aset keuangan diukur pada biaya perolehan diamortisasi jika memenuhi kondisi sebagai berikut:
- aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan dalam rangka mendapatkan arus kas kontraktual; dan
- persyaratan kontraktual dari aset keuangan tersebut memberikan hak pada tanggal tertentu atas arus kas yang diperoleh semata dari pembayaran pokok dan bunga (SPPI) dari jumlah pokok terutang.

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain jika memenuhi kondisi sebagai berikut:
- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk mendapatkan arus kas kontraktual dan menjual aset keuangan; dan
- Persyaratan kontraktual dari aset keuangan tersebut memenuhi kriteria SPPI.

Pada saat pengakuan awal, Grup dapat membuat pilihan yang tidak dapat dibatalkan untuk menyajikan instrumen ekuitas yang bukan dimiliki untuk diperdagangkan pada nilai wajar melalui penghasilan komprehensif lain.

Aset keuangan lainnya yang tidak memenuhi persyaratan untuk diklasifikasikan sebagai aset keuangan diukur pada biaya perolehan diamortisasi atau nilai wajar melalui penghasilan komprehensif lain, diklasifikasikan sebagai diukur pada nilai wajar melalui laba rugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

c. Financial assets and liabilities

(i) Classification

The Group classifies its financial assets according to the following categories at initial recognition:
- *Financial assets measured at fair value through profit or loss;*
- *Financial assets measured at fair value through other comprehensive income;*
- *Financial assets measured at amortised cost.*

Financial assets are measured at amortised cost if they meet the following conditions:
- *financial assets are managed in a business model that aims to have financial assets in order to obtain contractual cash flow; and*
- *the contractual terms of the financial assets provide rights on a certain date for cash flow obtained solely from payment of principal and interest (SPPI) on the principal amount owed.*

Financial assets are measured at fair value through other comprehensive income if they meet the following conditions:
- *Financial assets are managed in a business model that aims to obtain contractual cash flow and sell financial assets; and*
- *The contractual requirements of the financial assets meet the SPPI criteria.*

At initial recognition, the Group may make an irrevocable choice to present equity instruments that are not held for trading at fair value through other comprehensive income.

Other financial assets that do not meet the requirements to be classified as financial assets measured at amortised cost or fair value through other comprehensive income, are classified as measured at fair value through profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Saat pengakuan awal Grup dapat membuat penetapan yang tidak dapat dibatalkan untuk mengukur aset yang memenuhi persyaratan untuk diukur pada biaya perolehan diamortisasi atau nilai wajar melalui penghasilan komprehensif lain pada nilai wajar melalui laba rugi, apabila penetapan tersebut mengeliminasi atau secara signifikan mengurangi inkonsistensi pengukuran atau pengakuan (terkadang disebut sebagai "*accounting mismatch*").

Penilaian model bisnis

Model bisnis ditentukan pada level yang mencerminkan bagaimana kelompok aset keuangan dikelola bersama-sama untuk mencapai tujuan bisnis tertentu.

Penilaian model bisnis dilakukan dengan mempertimbangkan, tetapi tidak terbatas pada, hal-hal berikut:

- Bagaimana kinerja dari model bisnis dan aset keuangan yang dimiliki dalam model bisnis dievaluasi dan dilaporkan kepada personil manajemen kunci Grup;
- Apakah risiko yang memengaruhi kinerja dari model bisnis (termasuk aset keuangan yang dimiliki dalam model bisnis) dan khususnya bagaimana cara aset keuangan tersebut dikelola; dan
- Bagaimana penilaian kinerja pengelola aset keuangan (sebagai contoh, apakah penilaian kinerja berdasarkan nilai wajar dari aset yang dikelola atau arus kas kontraktual yang diperoleh).

Aset keuangan yang dimiliki untuk diperdagangkan atau dikelola dan penilaian kinerjanya berdasarkan nilai wajar diukur pada nilai wajar melalui laba rugi.

Derivatif juga dikategorikan dalam kelompok ini, kecuali derivatif yang ditetapkan sebagai instrumen lindung nilai efektif.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(i) Classification (continued)

At initial recognition, the Group can make an irrevocable determination to measure assets that meet the requirements to be measured at amortised cost or fair value through other comprehensive income at fair value through profit or loss, if the determination eliminates or significantly reduces the measurement or recognition inconsistencies (sometimes referred to as "accounting mismatch").

Evaluation of business models

The business model is determined at a level that reflects how groups of financial assets are managed together to achieve certain business objectives.

The evaluation of the business model is carried out by considering, but not limited to, the following:

- *How the performance of the business model and financial assets held in the business model are evaluated and reported to the Group's key management personnel;*
- *What risks affect the performance of the business model (including financial assets held in the business model) and specifically how the financial assets are managed; and*
- *How to evaluate the performance of managers of financial assets (for example, whether performance appraisals are based on the fair value of the assets being managed or the contractual cash flows obtained).*

Financial assets held for trading or managed and which performance appraisals based on fair value are measured at fair value through profit or loss.

Derivatives are also categorised under this classification, unless they are designated as effective hedging instruments.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga

Untuk tujuan penilaian ini, pokok didefinisikan sebagai nilai wajar dari aset keuangan pada saat pengakuan awal. Bunga didefinisikan sebagai imbalan untuk nilai waktu atas uang dan risiko kredit terkait jumlah pokok terutang pada periode waktu tertentu dan juga risiko dan biaya peminjaman standar, dan juga margin laba.

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga dilakukan dengan mempertimbangkan persyaratan kontraktual, termasuk apakah aset keuangan mengandung persyaratan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual. Dalam melakukan penilaian, Grup mempertimbangkan:

- Peristiwa kontinjensi yang akan mengubah waktu atau jumlah arus kas kontraktual;
- Fitur *leverage*;
- Persyaratan pembayaran di muka dan perpanjangan kontraktual;
- Persyaratan mengenai klaim yang terbatas atas arus kas yang berasal dari aset spesifik; dan
- Fitur yang dapat mengubah nilai waktu dari elemen uang.

Liabilitas keuangan diklasifikasikan ke dalam kategori sebagai berikut pada saat pengakuan awal:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi, yang memiliki 2 (dua) sub klasifikasi, yaitu liabilitas keuangan yang ditetapkan demikian pada saat pengakuan awal dan liabilitas keuangan yang telah diklasifikasikan dalam kelompok diperdagangkan;

- Liabilitas keuangan lain.
  Liabilitas keuangan lainnya merupakan liabilitas keuangan yang tidak dimiliki untuk dijual atau ditentukan sebagai nilai wajar melalui laba rugi saat pengakuan liabilitas.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(i) Classification (continued)

Evaluation of contractual cash flows obtained solely from payment of principal and interest

For the purpose of this evaluation, principal is defined as the fair value of financial assets at initial recognition. Interest is defined as compensation for the time value of money and credit risk in relation to the principal amount owed over a certain period of time and also the risk and standard borrowing costs, as well as profit margins.

An assessment of contractual cash flows obtained solely from principal and interest payments is made by considering contractual terms, including whether financial assets contain contractual terms that can change the timing or amount of contractual cash flows. In assessing, the Group considers:

- *Contingency events that will change the timing or amount of contractual cash flow;*
- *Leverage feature;*
- *Terms of advance payment and contractual extension;*
- *Requirements regarding limited claims for cash flows from specific assets; and*
- *Features that can change the time value of money element.*

Financial liabilities are classified into the following categories at initial recognition:

- *Financial liabilities at fair value through profit or loss, which has 2 (two) sub classifications, i.e. those designated as such upon initial recognition and those classified as held for trading;*

- *Other financial liabilities.*
  Other financial liabilities pertain to financial liabilities that are not held for trading nor designated as at fair value through profit or loss upon recognition of the liability.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(i) Classification (continued)

Kategori yang didefinisikan oleh PSAK 109/ ***Category as defined by SFAS 109***		**Golongan (ditentukan oleh Grup)/** ***Class (as determined by the Group)***	**Subgolongan/** ***Subclasses***
Aset keuangan/ *Financial assets*	Aset keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial assets at fair value through profit or loss*	Efek-efek/*Marketable securities*	
		Obligasi Pemerintah/*Government Bonds*	
		Tagihan derivatif - tidak terkait lindung nilai/*Derivative receivables - non hedging related*	
		Penyertaan saham/*Equity investment*	
	Aset keuangan yang diukur pada biaya perolehan yang diamortisasi/*Financial assets at amortised cost*	Kas/*Cash*	Kas pada *vendor*/*Cash in vendor*
		Giro pada Bank Indonesia/*Current accounts with Bank Indonesia*	
		Giro pada bank lain/*Current accounts with other banks*	
		Penempatan pada bank lain dan Bank Indonesia/*Placements with other banks and Bank Indonesia*	
		Efek-efek yang dibeli dengan janji dijual kembali/*Securities purchased under agreements to resell*	
		Wesel ekspor dan tagihan lainnya/*Bills and other receivables*	
		Tagihan akseptasi/*Acceptance receivables*	
		Pinjaman yang diberikan/*Loans*	
		Aset lain-lain/*Other assets*	Piutang lain-lain/*Other receivables*
			Piutang bunga/*Interest receivables*
			Lain-lain/*Others*
			Piutang terkait transaksi ATM/ *Receivables related to ATM transactions*
			Piutang premi asuransi/ *Insurance premium receivables*
		Efek-efek/*Marketable securities*	
		Obligasi Pemerintah/*Government Bonds*	
	Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain/*Financial assets at fair value through other comprehensive income*	Efek-efek/*Marketable securities*	
		Obligasi Pemerintah/*Government Bonds*	
		Penyertaan saham/*Equity investment*	

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(i) Klasifikasi (lanjutan)

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(i) Classification (continued)

Kategori yang didefinisikan oleh PSAK 109/ ***Category as defined by SFAS 109***		**Golongan (ditentukan oleh Grup)/** ***Class (as determined by the Group)***	**Subgolongan/** ***Subclasses***
Liabilitas keuangan/ *Financial liabilities*	Liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial liabilities at fair value through profit or loss*	Liabilitas derivatif - tidak terkait lindung nilai/*Derivative payables - non hedging related*	
	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/ *Financial liabilities at amortised cost*	Liabilitas segera/*Obligations due immediately*	
		Simpanan nasabah/*Deposits from customers*	
		Simpanan dari bank lain/*Deposits from other banks*	
		Efek-efek yang dijual dengan janji dibeli kembali/*Securities sold under agreements to repurchase*	
		Liabilitas akseptasi/*Acceptance payables*	
		Beban yang masih harus dibayar/*Accrued expenses*	
		Liabilitas lain-lain/*Other liabilities*	Setoran jaminan/*Security deposit*
			Utang bunga/*Interest payable*
			Utang nasabah/*Payable to customers*
			Utang ke pemegang polis/ *Obligation to policyholders*
			Utang reasuransi dan komisi/ *Reinsurance payable and commission*
			Lain-lain/*Others*
		Efek-efek yang diterbitkan/*Securities issued*	
		Efek-efek subordinasi/*Subordinated securities*	
		Pinjaman yang diterima/*Borrowings*	
Komitmen pinjaman dan kontrak jaminan keuangan/ *Loan commitment and financial guarantee contract*	Fasilitas kredit yang belum digunakan/*Unused loan facilities (committed)*		
	Letters of credit yang tidak dapat dibatalkan/*Irrevocable letters of credit*		
	Garansi bank yang diterbitkan/*Bank Guarantees issued*		
	Standby letters of credit		

(ii) Pengakuan awal

a. Pembelian atau penjualan aset keuangan yang memerlukan penyerahan aset dalam kurun waktu yang telah ditetapkan oleh peraturan dan kebiasaan yang berlaku di pasar (pembelian secara reguler) diakui pada tanggal perdagangan, yaitu tanggal Grup berkomitmen untuk membeli atau menjual aset.

b. Aset keuangan dan liabilitas keuangan pada awalnya diukur pada nilai wajarnya. Dalam hal aset keuangan atau liabilitas keuangan tidak diklasifikasikan sebagai nilai wajar melalui laba rugi, nilai wajar tersebut ditambah/dikurangi biaya transaksi yang dapat diatribusikan secara langsung dengan perolehan atau penerbitan aset keuangan atau liabilitas keuangan.

(ii) Initial recognition

a. Purchase or sale of financial assets that requires delivery of assets within a time frame established by regulation or convention in the market (regular purchases) is recognised on the trade date, i.e., the date that the Group commits to purchase or sell the assets.

b. Financial assets and financial liabilities are initially recognised at fair value. For those financial assets or financial liabilities not classified as fair value through profit or loss, the fair value is added/deducted with directly attributable transaction costs to the issuance of financial assets or liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(ii) Pengakuan awal (lanjutan)

Grup, pada pengakuan awal, dapat menetapkan aset keuangan dan liabilitas keuangan tertentu sebagai nilai wajar melalui laba rugi (opsi nilai wajar). Opsi nilai wajar dapat digunakan hanya bila memenuhi ketetapan sebagai opsi nilai wajar tersebut mengurangi atau mengeliminasi ketidakkonsistenan pengukuran dan pengakuan (*accounting mismatch*) yang dapat timbul.

(iii) Pengukuran setelah pengakuan awal

Aset keuangan dalam kelompok aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan aset keuangan dan liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi diukur pada nilai wajarnya. Aset keuangan kelompok biaya perolehan diamortisasi dan liabilitas keuangan lainnya diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

(iv) Penghentian pengakuan

a. Aset keuangan dihentikan pengakuannya jika:

- Hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir; atau
- Grup telah mentransfer haknya untuk menerima arus kas yang berasal dari aset tersebut atau menanggung liabilitas untuk membayarkan arus kas yang diterima tersebut secara penuh tanpa penundaan berarti kepada pihak ketiga dibawah kesepakatan pelepasan, dan antara (a) Grup telah mentransfer secara substansial seluruh risiko dan manfaat atas aset, atau (b) Grup tidak mentransfer maupun tidak memiliki secara substansial seluruh risiko dan manfaat atas aset, tetapi telah mentransfer kendali atas aset.

Ketika Grup telah mentransfer hak untuk menerima arus kas dari aset atau telah memasuki kesepakatan pelepasan dan tidak mentransfer serta tidak mempertahankan secara substansial seluruh risiko dan manfaat atas aset atau tidak mentransfer kendali atas aset, aset diakui sebesar keterlibatan Grup yang berkelanjutan atas aset tersebut.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(ii) Initial recognition (continued)

The Group, upon initial recognition, may designate certain financial assets and financial liabilities, at fair value through profit or loss (fair value option). The fair value option is only applied when the application of the fair value option reduces or eliminates the measurement or recognition inconsistencies (accounting mismatch) that would otherwise arise.

(iii) Subsequent measurement

Financial assets at fair value through other comprehensive income and financial assets and financial liabilities at fair value through profit or loss are measured at fair value. Financial assets classified as amortised cost and other financial liabilities measured at amortised cost using the effective interest rate method.

(iv) Derecognition

a. Financial assets are derecognised when:

- *The contractual rights to receive cash flows from the financial assets have expired; or*
- *The Group has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flow in full without material delay to a third party under a 'pass-through' arrangement; and 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 all the risks and rewards of the asset, but has transferred control of the asset.*

When the Group has transferred its rights to receive cash flows from an asset or has entered into a pass-through arrangement and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognised to the extent of the Group's continuing involvement in the asset.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(iv) Penghentian pengakuan (lanjutan)

a. Aset keuangan dihentikan pengakuannya jika: (lanjutan)

Pinjaman yang diberikan dihapusbukukan ketika tidak terdapat prospek yang realistis mengenai pengembalian pinjaman atau hubungan normal antara Grup dan debitur telah berakhir. Pinjaman yang tidak dapat dilunasi tersebut dihapusbukukan dengan mendebit cadangan kerugian penurunan nilai.

b. Liabilitas keuangan dihentikan pengakuannya jika liabilitas yang ditetapkan dalam kontrak dilepaskan atau dibatalkan atau kadaluwarsa.

Jika suatu liabilitas keuangan yang ada digantikan dengan liabilitas yang lain oleh pemberi pinjaman yang sama pada keadaan yang secara substansial berbeda, atau berdasarkan suatu liabilitas yang ada yang secara substansial telah diubah, maka pertukaran atau modifikasi tersebut diperlakukan sebagai penghentian pengakuan liabilitas awal dan pengakuan liabilitas baru, dan perbedaan nilai tercatat masing-masing diakui dalam laporan laba rugi.

(v) Pengakuan pendapatan dan beban

a. Pendapatan dan beban bunga atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain serta aset keuangan dan liabilitas keuangan yang dicatat berdasarkan biaya perolehan diamortisasi, diakui pada laporan laba rugi dengan menggunakan metode suku bunga efektif.

Jumlah tercatat bruto aset keuangan adalah biaya perolehan diamortisasi aset keuangan sebelum disesuaikan dengan cadangan penurunan nilai.

Dalam menghitung pendapatan dan beban bunga, tingkat bunga efektif diterapkan pada jumlah tercatat bruto aset (ketika aset tersebut bukan aset keuangan memburuk) atau terhadap biaya perolehan diamortisasi dari liabilitas.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(iv) Derecognition (continued)

a. Financial assets are derecognised when: (continued)

Loans are written off when there is no realistic prospect of collection in the near future or the normal relationship between the Group and the borrowers have ceased to exist. When a loan is deemed uncollectible, it is written off against the related allowance for impairment losses.

b. Financial liabilities are derecognised when the obligation under the liability is discharged or cancelled or has expired.

Where an existing financial liability is replaced by another liability from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the profit or loss.

(v) Income and expense recognition

a. Interest income and expense on financial assets measured at fair value through other comprehensive income as well as financial assets and financial liabilities recorded at amortised cost are recognised in the statement of profit or loss using the effective interest rate method.

The gross carrying amount of a financial asset is the amortised cost of a financial asset before adjusting for allowance for impairment.

In calculating interest income and expenses, the effective interest rate is applied to the gross carrying amount of an asset (when the asset is not an impaired financial asset) or to the amortised cost of a liability.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(v) Pengakuan pendapatan dan beban (lanjutan)

b. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar atas aset keuangan yang diklasifikasikan dalam kelompok nilai wajar melalui penghasilan komprehensif lain diakui secara langsung dalam laporan laba rugi dan penghasilan komprehensif lain (merupakan bagian dari ekuitas), sampai aset keuangan tersebut dihentikan pengakuannya atau adanya penurunan nilai, kecuali keuntungan atau kerugian akibat perubahan nilai tukar untuk instrumen utang.

Pada saat aset keuangan dihentikan pengakuannya atau dilakukan penurunan nilai, keuntungan atau kerugian kumulatif yang sebelumnya diakui dalam ekuitas harus diakui pada laporan laba rugi.

(vi) Reklasifikasi aset keuangan

Grup mereklasifikasi aset keuangan jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

Reklasifikasi aset keuangan dari klasifikasi biaya perolehan yang diamortisasi ke klasifikasi nilai wajar melalui laba rugi dicatat sebesar nilai wajarnya. Selisih antara nilai tercatat dengan nilai wajar diakui sebagai keuntungan atau kerugian pada laba rugi dan penghasilan komprehensif lain.

Reklasifikasi aset keuangan dari klasifikasi biaya perolehan yang diamortisasi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat sebesar nilai wajarnya.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui penghasilan komprehensif lain ke klasifikasi nilai wajar melalui laba rugi dicatat pada nilai wajarnya. Keuntungan atau kerugian yang belum direalisasi direklasifikasi ke laba rugi.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(v) Income and expense recognition (continued)

b. Gains and losses arising from changes in the fair value of financial assets that classified as fair value through statement of profit or loss and other comprehensive income are recognised directly in other comprehensive income (as part of equity), until the financial asset is derecognised or impaired, except gain or loss arising from changes in exchange rate for debt instruments.

When a financial asset is derecognised or impaired, the cumulative gains or losses previously recognised in equity are recognised in profit or loss.

(vi) Reclassification of financial assets

The Group reclassifies financial assets if and only if, the business model for managing financial assets changes.

Reclassifications of financial assets from amortised cost classifications to fair value through profit or loss are recorded at fair value. The difference between the recorded value and fair value is recognised in profit or loss on the statement of profit or loss and other comprehensive income.

Reclassifications of financial assets from amortised cost classifications to fair value through other comprehensive income are recorded at their fair values.

Reclassification of financial assets from fair value through other comprehensive income to fair value through profit or loss is recorded at fair value. Unrealised gains or losses are reclassified to profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(vi) Reklasifikasi aset keuangan (lanjutan)

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui penghasilan komprehensif lain ke klasifikasi biaya perolehan yang diamortisasi dicatat pada nilai wajarnya pada tanggal reklasifikasi. Keuntungan atau kerugian yang belum direalisasi dihapus dari ekuitas dan disesuaikan terhadap nilai wajar.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada nilai wajar.

Reklasifikasi aset keuangan dari klasifikasi nilai wajar melalui laba rugi ke klasifikasi biaya perolehan yang diamortisasi dicatat pada nilai wajar.

(vii) Saling hapus

Aset keuangan dan liabilitas keuangan saling hapus buku dan nilai netonya disajikan dalam laporan posisi keuangan konsolidasian jika, dan hanya jika, Grup memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan adanya maksud untuk menyelesaikan secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara bersamaan.

Hak yang berkekuatan hukum harus tidak kontinjen atas peristiwa di masa depan dan harus dapat dipaksakan di dalam situasi bisnis yang normal dan peristiwa kegagalan atau kebangkrutan dari Grup atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah neto hanya jika diperkenankan oleh standar akuntansi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(vi) Reclassification of financial assets (continued)

Reclassification of financial assets from fair value through other comprehensive income to the amortised cost is recorded at fair value at the date of reclassification. Unrealised gains or losses is removed from equity and is adjusted against the fair value.

Reclassifications on financial assets from fair value through profit or loss to fair value through other comprehensive income are recorded at fair value.

Reclassification of financial assets from fair value through profit or loss to amortised cost classification is recorded at fair value.

(vii) Offsetting

Financial assets and liabilities are set off and the net amount is presented in the consolidated statement of financial position when, and only when, the Group has a legal right to set off the amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Group or the counterparty.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(viii) Pengukuran biaya diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset keuangan atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok pinjaman, ditambah atau dikurangi amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai pengakuan awal dan nilai jatuh temponya, dan dikurangi penurunan nilai.

(ix) Pengukuran nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam suatu transaksi teratur antara pelaku pasar pada tanggal pengukuran.

Jika tersedia, Grup mengukur nilai wajar dari suatu instrumen dengan menggunakan harga kuotasi di pasar aktif untuk instrumen terkait. Suatu pasar dianggap aktif bila harga yang dikuotasikan tersedia sewaktu-waktu dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service or regulatory agency*), dan merupakan transaksi pasar aktual dan teratur terjadi yang dilakukan secara wajar. Nilai wajar dapat diperoleh dari *Interdealer Market Association (IDMA)* atau harga pasar atau harga yang diberikan oleh *broker* (*quoted price*) dari Bloomberg atau Reuters pada tanggal pengukuran.

Jika pasar untuk instrumen keuangan tidak aktif, Grup menetapkan nilai wajar dengan menggunakan teknik penilaian.

Grup menggunakan beberapa teknik penilaian yang digunakan secara umum untuk menentukan nilai wajar dari instrumen keuangan dengan tingkat kompleksitas yang rendah, seperti opsi nilai tukar dan *swap* mata uang. *Input* yang digunakan dalam teknik penilaian untuk instrumen keuangan di atas adalah data pasar yang diobservasi.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(viii) Amortised cost measurement

The amortised cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition, minus principal repayments, plus or minus the cumulative amortization using the effective interest rate method of any difference between the initial amount recognised and the maturity amount, minus any reduction for impairment.

(ix) Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at measurement date.

When available, the Group measures the fair value of an instrument using quoted prices in an active market for that instrument. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency and those prices represent actual and regularly occurring market transaction on an arm's length basis. The fair value can be obtained from IDMA's (Interdealer Market Association) or quoted market prices or broker's quoted price from Bloomberg or Reuters on the measurement date.

If a market for a financial instrument is not active, the Group establishes fair value using a valuation technique.

The Group uses widely recognised valuation models for determining fair values of financial instruments of lower complexity, such as exchange value options and currency swaps. For these financial instruments, inputs into models are generally market-observable data.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(ix) Pengukuran nilai wajar (lanjutan)

Untuk instrumen yang lebih kompleks, Grup menggunakan model penilaian internal, yang pada umumnya berdasarkan teknik dan metode penilaian yang umumnya diakui sebagai standar industri. Model penilaian terutama digunakan untuk menilai kontrak derivatif yang ditransaksikan melalui pasar *over-the-counter*, *unlisted debt securities* (termasuk surat utang dengan derivatif melekat) dan instrumen utang lainnya yang pasarnya tidak aktif.

Untuk instrumen keuangan yang tidak mempunyai harga pasar, estimasi atas nilai wajar efek-efek ditetapkan dengan mengacu pada nilai wajar instrumen lain yang substansinya sama atau dihitung berdasarkan arus kas yang diharapkan terhadap aset bersih efek-efek tersebut.

Hasil dari suatu teknik penilaian merupakan sebuah estimasi atau perkiraan dari suatu nilai yang tidak dapat ditentukan dengan pasti, dan teknik penilaian yang digunakan mungkin tidak dapat menggambarkan seluruh faktor yang relevan atas posisi yang dimiliki Grup. Dengan demikian, penilaian disesuaikan dengan faktor tambahan seperti *model risk*, risiko likuiditas dan risiko kredit *counterparty*. Berdasarkan kebijakan teknik penilaian nilai wajar, pengendalian dan prosedur yang diterapkan, manajemen berkeyakinan bahwa penyesuaian atas penilaian tersebut di atas diperlukan dan dianggap tepat untuk menyajikan secara wajar nilai dari instrumen keuangan yang diukur berdasarkan nilai wajar dalam laporan posisi keuangan konsolidasian. Data harga dan parameter yang digunakan di dalam prosedur pengukuran pada umumnya telah ditelaah dan disesuaikan jika diperlukan, khususnya untuk perkembangan atas pasar terkini.

Nilai wajar atas pinjaman yang diberikan dan piutang, serta liabilitas kepada bank dan nasabah ditentukan menggunakan nilai berdasarkan arus kas kontraktual, dengan mempertimbangkan kualitas kredit, likuiditas dan biaya.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(ix) Fair value measurement (continued)

For more complex instruments, the Group uses internally developed models, which are usually based on valuation methods and techniques generally recognised as standard within the industry. Valuation models are used primarily to value derivatives transacted in the over-the-counter market, unlisted debt securities (including those debt with embedded derivatives) and other debt instruments for which markets were or have become inactive.

For financial instruments with no quoted market price, a reasonable estimate of the fair value is determined by reference to the fair value of another instrument which substantially has the same characteristics or calculated based on the expected cash flows of the underlying net asset base of the marketable securities.

The output of a valuation technique is an estimation or approximation of a value that cannot be determined with certainty, and the valuation technique employed may not fully reflect all factors relevant to the positions that the Group holds. Valuations are therefore adjusted, with additional factors such as model risk, liquidity risk and counterparty credit risk. Based on the established fair value valuation technique policy, related controls and procedures applied, management believes that these valuation adjustments are necessary and considered appropriate to fairly state the values of financial instruments measured at fair value in the consolidated statement of financial position. Price data and parameters used in the measurement procedures applied are generally reviewed and adjusted, if necessary, particularly in view of the current market developments.

The fair value for loans and receivables as well as liabilities to banks and customers are determined using a present value model on the basis of contractually agreed cash flows, taking into account credit quality, liquidity and costs.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(ix) Pengukuran nilai wajar (lanjutan)

Semua aset dan liabilitas dimana nilai wajar diukur atau diungkapkan dalam laporan keuangan konsolidasian dapat dikategorikan pada level hierarki nilai wajar, berdasarkan tingkatan sebagai berikut:

- Tingkat 1: Harga kuotasian (tidak disesuaikan) dari pasar aktif untuk aset atau liabilitas yang identik.
- Tingkat 2: *Input* selain harga yang dikutip dari pasar yang disertakan pada Tingkat 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung (yaitu sebagai suatu harga) atau secara tidak langsung (sebagai turunan dari harga).
- Tingkat 3: *Input* untuk aset atau liabilitas yang tidak didasarkan pada data pasar yang dapat diobservasi (informasi yang tidak dapat diobservasi).

(x) Cadangan kerugian penurunan nilai atas aset keuangan

- Grup mengakui penyisihan kerugian kredit ekspektasian pada instrumen keuangan yang tidak diukur pada nilai wajar melalui laba rugi.

- Tidak ada penyisihan kerugian kredit ekskpektasian pada investasi instrumen ekuitas.

- Grup mengukur cadangan kerugian sejumlah kerugian kredit ekspektasian sepanjang umurnya, kecuali untuk hal berikut, diukur sejumlah kerugian kredit ekspektasian 12 bulan:
  - instrumen utang yang memiliki risiko kredit rendah pada tanggal pelaporan; dan
  - instrumen keuangan lainnya yang risiko kreditnya tidak meningkat secara signifikan sejak pengakuan awal.

Grup menganggap instrumen utang memiliki risiko kredit yang rendah ketika peringkat risiko kreditnya setara dengan definisi *investment grade*.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(ix) Fair value measurement (continued)

All assets and liabilities which fair value is measured or disclosed in the consolidated financial statements can be classified in fair value hierarchy levels, based on following level:

- *Level 1: Quoted price (unadjusted) in active markets for identical assets or liabilities.*
- *Level 2: Inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly (as a price) or indirectly (as derived from price).*

- *Level 3: Input for asset or liability based on unobservable inputs for the asset or liability.*

(x) Allowance for impairment losses on financial assets

- *The Group recognises the allowance for expected credit losses on financial instruments that are not measured at fair value through profit or loss.*

- *There is no allowance for expected credit losses on investment in equity instruments.*

- *The Group measure the allowance for losses for the lifetime of an expected credit losses, except for the following, which are measured according to 12 months expected credit losses:*
  - *debt instruments that have low credit risk at the reporting date; and*
  - *other financial instruments for which credit risk has not increased significantly since initial recognition.*

The Group considers debt instruments to have low credit risk when the credit risk rating is at par with the definition of investment grade.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Kerugian kredit ekspektasian 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan kerugian kredit ekspektasian yang timbul dari peristiwa gagal bayar instrumen keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan.

Pengukuran Kerugian Kredit Ekspektasian

Kerugian Kredit Ekspektasian adalah estimasi probabilitas tertimbang dari kerugian kredit yang diukur sebagai berikut:

- aset keuangan yang tidak memburuk pada tanggal pelaporan, kerugian kredit ekspektasian diukur sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu 12 bulan sejak tanggal pelaporan. Kredit ekspektasian terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka kerugian kredit ekspektasian dihitung kembali berdasarkan basis 12 bulan;
- aset keuangan yang memburuk pada tanggal pelaporan, kerugian kredit ekspektasian diukur sebesar selisih antara jumlah tercatat bruto dan nilai kini arus kas masa depan yang diestimasi;
- komitmen pinjaman yang belum ditarik, kerugian kredit ekspektasian diukur sebesar selisih antara nilai kini jumlah arus kas jika komitmen ditarik dan arus kas yang diperkirakan akan diterima oleh Grup;
- kontrak jaminan keuangan, kerugian kredit ekspektasian diukur sebesar selisih antara pembayaran yang diperkirakan untuk mengganti pemegang atas kerugian kredit yang terjadi dikurangi jumlah yang diperkirakan dapat dipulihkan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

The 12-month expected credit loss is part of the expected credit loss throughout its lifetime that represents an expected credit loss arising from a default on financial instruments that might occur 12 months after reporting date.

Measurement of Expected Credit Losses

Expected Credit Loss is an estimate of the weighted probability of a credit loss measured as follows:

- *financial assets that do not deteriorate at the reporting date, the expected credit loss is measured at the lifetime cash shortfalls arising from possible default events up to 12 months into the future from the reporting date. Expected credit losses continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, expected credit losses will revert to being determined on a 12-month basis;*
- *financial assets that deteriorate at the reporting date, the expected credit loss is measured at the difference between the gross carrying amount and the present value of estimated future cash flows;*
- *for undisbursed loan commitments, expected credit losses are measured at the difference between the present value of the amount of cash flow if the commitments is withdrawn and the cash flow expected to be received by the Group;*
- *for financial guarantee contracts, expected credit losses are measured at the difference between the estimated payments to replace the holder for the credit losses incurred less the amount estimated to be recoverable.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset Keuangan yang Direstrukturisasi

Jika ketentuan aset keuangan dinegosiasikan ulang atau dimodifikasi atau aset keuangan yang ada diganti dengan yang baru karena kesulitan keuangan peminjam, maka dilakukan penilaian apakah aset keuangan yang ada harus dihentikan pengakuannya dan kerugian kredit ekspektasian diukur sebagai berikut:

- Apabila syarat-syarat tersebut berbeda secara substansial, Grup menghentikan pengakuan aset keuangan awal dan mengakui aset keuangan yang 'baru' pada nilai wajarnya dan menghitung kembali suku bunga efektif yang baru untuk aset tersebut. Tanggal renegosiasi syarat pinjaman dianggap sebagai tanggal pengakuan awal untuk keperluan perhitungan penurunan nilai, termasuk untuk menentukan apakah terdapat kenaikan signifikan risiko kredit. Namun, Grup juga menilai apakah aset keuangan baru dianggap sebagai aset keuangan yang mengalami penurunan nilai pada pengakuan awal, terutama dalam keadaan dimana renegosiasi didorong oleh peminjam yang tidak dapat melakukan pembayaran yang sudah disetujui sebelumnya. Selisih dari nilai tercatat juga diakui pada laporan laba rugi konsolidasian di pembentukan cadangan kerugian penurunan nilai sebagai laba rugi dari penghentian pengakuan aset keuangan. Untuk Grup, bila kerugian berelasi dengan risiko kredit, Grup mengklasifikasikan kerugian ke dalam pembentukan cadangan kerugian penurunan nilai.
- Apabila syarat-syarat tersebut tidak berbeda secara substansial, renegosiasi atau modifikasi tidak menghasilkan penghentian pengakuan, dan Grup menghitung kembali nilai tercatat bruto berdasarkan arus kas yang sudah dimodifikasi dari aset keuangan dan mengakui laba atau rugi modifikasi di laporan laba rugi konsolidasian. Nilai tercatat bruto yang baru dihitung kembali dengan mendiskontokan arus kas yang telah dimodifikasi dengan menggunakan tingkat suku bunga efektif awal.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Restructured Financial Assets

If the terms of the financial assets are renegotiated or modified or the existing financial assets are replaced with new ones due to the borrower's financial difficulties, an assessment is made whether recognition of existing financial assets must be derecognised and expected credit losses measured as follows:

- *If the terms are substantially different, the Group derecognises the original financial asset and recognises a 'new' asset at fair value and recalculates a new effective interest rate for the asset. The date of renegotiation is consequently considered to be the date of initial recognition for impairment calculation purposes, including for the purpose of determining whether a significant increase in credit risk has occurred. However, the Group also assesses whether the new financial asset recognised is deemed to be credit-impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences in the carrying amount are also recognised in the consolidated statement of profit or loss in allowance for impairment losses as a gain or loss on derecognition. For the Group, to the extent that the loss does relate to credit risk, the Group classifies that loss within allowance for impairment losses.*
- *If the terms are not substantially different, the renegotiation or modification does not result in derecognition, and the Group recalculates the gross carrying amount based on the revised cash flows of the financial asset and recognises a modification gain or loss in consolidated statements of profit or loss. The new gross carrying amount is recalculated by discounting the modified cash flows at the original effective interest rate.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset keuangan yang memburuk

Pada setiap tanggal pelaporan, Grup menilai apakah aset keuangan yang dicatat pada biaya perolehan diamortisasi dan aset keuangan instrumen utang yang dicatat pada nilai wajar melalui penghasilan komprehensif lain mengalami penurunan nilai kredit (memburuk). Aset keuangan memburuk ketika satu atau lebih peristiwa yang memiliki dampak merugikan atas estimasi arus kas masa depan dari aset keuangan telah terjadi.

Bukti bahwa aset keuangan mengalami penurunan nilai kredit (memburuk) termasuk data yang dapat diobservasi mengenai peristiwa berikut ini:

- kesulitan keuangan signifikan yang dialami penerbit atau pihak peminjam;
- pelanggaran kontrak, seperti peristiwa gagal bayar atau peristiwa tunggakan;
- pihak pemberi pinjaman, untuk alasan ekonomi atau kontraktual sehubungan dengan kesulitan keuangan yang dialami pihak peminjam, telah memberikan konsesi pada pihak peminjam yang tidak mungkin diberikan jika pihak peminjam tidak mengalami kesulitan tersebut;
- terjadi kemungkinan bahwa pihak peminjam akan dinyatakan pailit atau melakukan reorganisasi keuangan lainnya;
- hilangnya pasar aktif dari aset keuangan akibat kesulitan keuangan; atau
- pembelian atau penerbitan aset keuangan dengan diskon sangat besar yang mencerminkan kerugian kredit yang terjadi.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(x) Allowance for impairment losses on financial assets (continued)

Credit-impaired financial assets

At each reporting date, the Group assesses whether the financial assets recorded at amortised cost and the debt instrument financial assets which are recorded at fair value through other comprehensive income are credit-impaired (worsening). Financial assets deteriorate when one or more events that have an adverse effect on the estimated future cash flows of the financial assets have occurred.

Evidence that financial assets become credit impaired including observable data regarding the following events:

- *significant financial difficulties experienced by the issuer or the borrower;*
- *breach of contract, such as a default or arrears;*
- *the lender, for economic or contractual reasons in relation to the financial difficulties experienced by the borrower, has given concessions to the borrower which is not possible if the borrower does not experience such difficulties;*
- *it is probable that the borrower will enter bankruptcy or the other financial reorganization;*
- *loss of an active market for financial assets due to financial difficulties; or*
- *purchase or issuance of financial asset at significant discount which reflect the credit loss that occurs.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Aset Keuangan yang dibeli atau yang berasal dari aset keuangan memburuk - POCI

Aset keuangan dikategorikan sebagai POCI apabila terdapat bukti objektif penurunan nilai pada saat pengakuan awal. Pada saat pengakuan awal, tidak ada penyisihan kerugian kredit yang diakui karena harga pembelian atau nilainya telah termasuk estimasi kerugian kredit sepanjang umurnya. Selanjutnya, setiap perubahan kerugian kredit ekspektasian sepanjang umurnya akan diakui sebagai keuntungan atau kerugian penurunan nilai dalam laporan laba rugi konsolidasian.

Penyajian Penyisihan Kerugian Kredit Ekspektasian Dalam Laporan Posisi Keuangan Konsolidasian

Penyisihan kerugian kredit ekspektasian disajikan dalam laporan posisi keuangan konsolidasian sebagai berikut:

- aset keuangan yang diukur pada biaya perolehan diamortisasi, penyisihan kerugian kredit ekspektasian disajikan sebagai pengurang dari jumlah tercatat bruto aset;
- komitmen pinjaman dan kontrak jaminan keuangan, penyisihan kerugian kredit ekspektasian disajikan sebagai provisi;
- instrumen utang yang diukur pada nilai wajar melalui penghasilan komprehensif lain, penyisihan kerugian kredit ekspektasian tidak diakui dalam laporan posisi keuangan karena jumlah tercatat dari aset-aset ini adalah nilai wajarnya. Namun demikian, penyisihan kerugian kredit ekspektasian diungkapkan dan diakui dalam penghasilan komprehensif lain.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Purchased or originated credit-impaired financial assets - POCI

Financial assets are categorised as POCI if there is objective evidence of impairment at initial recognition. At initial recognition, no allowance for credit losses is recognised because the purchase price or value has included lifetime estimated credit losses. Subsequently, any changes in the lifetime expected credit losses will be recognised as an impairment gain or loss in the consolidated statement of profit or loss.

Presentation of Allowance for Expected Credit Losses in the Statement of Consolidated Financial Position

Allowance for expected credit losses is presented in the statement of consolidated financial positions as follows:

- *for financial assets measured at amortised cost, allowance for expected credit losses is presented as a deduction from the gross carrying amount of the asset;*
- *for loan commitments and financial guarantee contracts, allowance for expected credit losses is presented as a provision;*
- *for debt instruments measured at fair value through other comprehensive income, allowance for expected credit losses are not recognised in the statement of financial position because the carrying amounts of these assets are at their fair values. However, allowance for expected credit losses is disclosed and recognised in other comprehensive income.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Perhitungan penurunan nilai secara individual

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara individual, dengan ketentuan sebagai berikut:

a. Pinjaman yang diberikan Segmen Korporasi dan Menengah yang memenuhi kriteria:
   - Memiliki umur tunggakan lebih dari 90 hari (kolektibilitas 3-5); atau
   - Memiliki rating *default* (*rating* 20-23); atau
   - Memiliki *rating non-investment grade* (rating 13-19) dan dilakukan restrukturisasi (kecuali untuk restrukturisasi Covid-19).
b. Pinjaman yang diberikan Segmen Kecil dan Konsumer yang memiliki maksimum lebih besar atau sama dengan Rp15 miliar (nilai penuh) yang memenuhi kriteria:
   - Memiliki umur tunggakan lebih dari 90 hari (kolektibilitas 3-5); atau
   - Dilakukan restrukturisasi (kecuali untuk restrukturisasi Covid-19).

Perhitungan penurunan nilai secara kolektif

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara kolektif, jika memenuhi salah satu kriteria di bawah ini:

a. Pinjaman yang diberikan yang secara individual memiliki nilai tidak signifikan; atau
b. Pinjaman yang diberikan yang direstrukturisasi yang secara individual memiliki nilai tidak signifikan.

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan

Ketika pinjaman yang diberikan tidak tertagih, pinjaman yang diberikan tersebut dihapus buku dengan menjurnal balik cadangan kerugian penurunan nilai. Pinjaman yang diberikan tersebut dapat dihapus buku setelah semua prosedur yang diperlukan telah dilakukan dan jumlah kerugian telah ditentukan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***c. Financial assets and liabilities** (continued)*

(x) Allowance for impairment losses on financial assets (continued)

Individual impairment calculation

The Bank determines that loans should be evaluated for impairment through individual evaluation with the following criteria:

a. Loans for Corporate and Middle Segment that meet the criteria:
   - *Has overdue age more than 90 days (collectability 3-5); or*
   - *Has a default rating (rating 20-23); or*
   - *Has a non-investment grade rating (rating 13-19) and is undergoing restructuring (except for restructuring Covid-19).*

b. Loans for Small and Consumer Segment with the maximum of more than or equal to Rp15 billion (full amount) that meet the criteria:
   - *Has overdue age more than 90 days (collectability 3-5); or*
   - *Has been restructured (except for restructuring Covid-19).*

Collective impairment calculation

The Bank determines loans to be evaluated for impairment through collective evaluation if one of the following criteria is met:

a. Loans which individually have insignificant value; or

b. Restructured loans which individually have insignificant value.

Recoveries of written-off financial assets

When a loan is uncollectible, it is written-off against the related allowance for impairment loss. Such loans are written off after all the necessary procedures have been completed and the amount of the loss has been determined.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Aset dan liabilitas keuangan (lanjutan)

(x) Cadangan kerugian penurunan nilai atas aset keuangan (lanjutan)

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan (lanjutan)

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan pada tahun berjalan dikreditkan dengan menyesuaikan akun cadangan kerugian penurunan nilai. Penerimaan kembali atas aset keuangan yang telah dihapusbukukan dicatat sebagai pendapatan operasional selain pendapatan bunga.

d. Prinsip konsolidasian

Laporan keuangan konsolidasian meliputi laporan keuangan BNI beserta seluruh Entitas Anak yang berada di bawah pengendalian BNI. Entitas Anak adalah seluruh entitas (termasuk entitas terstruktur) dimana Grup memiliki pengendalian.

Dalam hal pengendalian terhadap Entitas Anak dimulai atau diakhiri dalam suatu tahun berjalan, maka hasil usaha Entitas Anak yang diperhitungkan ke dalam laporan keuangan konsolidasian hanya sebatas hasil pada saat pengendalian tersebut mulai diperoleh atau hingga saat pengendalian itu berakhir.

Pengendalian didapat ketika BNI terekspos atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak dan memiliki kemampuan untuk memengaruhi imbal hasil tersebut melalui kekuasaannya atas Entitas Anak.

BNI mengendalikan Entitas Anak, jika dan hanya jika, BNI memiliki hal berikut ini:

a) kekuasaan atas Entitas Anak (hak yang ada saat ini yang memberi kemampuan kini untuk mengarahkan aktivitas relevan yang secara signifikan memengaruhi imbal hasil Entitas Anak);
b) eksposur atau hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak; dan
c) kemampuan untuk menggunakan kekuasaannya atas Entitas Anak untuk memengaruhi jumlah imbal hasil Entitas Anak.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

c. Financial assets and liabilities *(continued)*

(x) Allowance for impairment losses on financial assets (continued)

Recoveries of written-off financial assets *(continued)*

The recoveries of written-off financial assets in the current year are credited by adjusting the allowance for impairment losses accounts. Recoveries of written-off financial assets are recorded as operating income other than interest income.

d. Principles of consolidation

The consolidated financial statements include the financial statements of BNI and all its Subsidiaries that are controlled by BNI. Subsidiaries are all entities (including structured entities) over which the Group has control.

Where Subsidiaries either began or ceased to be controlled during the year, the results of operations of those Subsidiaries are included in the consolidated financial statements only from the date that the control has commenced or up to the date that the control has ceased.

Control is acquired when BNI is exposed or has rights to variable returns from its involvement with Subsidiaries and has the ability to affect those returns through its power over Subsidiaries.

BNI controls a Subsidiary if, and only if, BNI has the following:

a) power over a Subsidiary (existing rights that provide the current ability to direct the relevant activities that significantly affect returns of a Subsidiary);

b) exposure or rights to variable returns from its involvement with the Subsidiary; and

c) the ability to use its power over the Subsidiary to affect the amount of the Subsidiary's returns.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Bila Grup tidak memiliki hak suara atau hak serupa secara mayoritas atas suatu Entitas Anak, Grup mempertimbangkan semua fakta dan keadaan yang relevan dalam mengevaluasi apakah mereka memiliki kekuasaan atas Entitas Anak, termasuk:

i) Pengaturan kontraktual dengan pemilik hak suara lainnya dari Entitas Anak,
ii) Hak yang timbul atas pengaturan kontraktual lain, dan
iii) Hak suara dan hak suara potensial yang dimiliki Grup.

Grup menilai kembali apakah mereka mengendalikan Entitas Anak bila fakta dan keadaan mengindikasikan adanya perubahan terhadap satu atau lebih dari ketiga elemen dari pengendalian. Konsolidasi atas Entitas Anak dimulai sejak Grup memperoleh pengendalian atas Entitas Anak dan tidak lagi mengkonsolidasikan ketika Grup kehilangan pengendalian atas Entitas Anak. Aset, liabilitas, penghasilan dan beban dari Entitas Anak yang diakuisisi pada tahun tertentu disertakan dalam laporan keuangan konsolidasian sejak tanggal Grup memperoleh kendali sampai tanggal Grup tidak lagi mengendalikan Entitas Anak tersebut.

Kombinasi bisnis dicatat dengan menggunakan metode akuisisi. Imbalan yang diserahkan untuk akuisisi suatu entitas anak adalah sebesar nilai wajar aset yang diserahkan, saham yang diterbitkan atau liabilitas yang diakui pada tanggal akuisisi. Kelebihan jumlah imbalan yang dialihkan dan nilai wajar jumlah kepentingan nonpengendali atas jumlah aset teridentifikasi bersih yang diperoleh dan kewajiban yang timbul dicatat sebagai *goodwill*. Jika jumlah imbalan yang diserahkan lebih rendah dari nilai wajar aset bersih entitas anak yang diakuisisi, selisihnya diakui langsung dalam laporan laba rugi konsolidasian.

Jika akuntansi awal untuk kombinasi bisnis belum selesai pada akhir periode pelaporan saat kombinasi terjadi, Grup melaporkan jumlah sementara untuk pos-pos yang proses akuntansinya belum selesai dalam laporan keuangannya. Selama periode pengukuran, pihak pengakuisisi melakukan penyesuaian, aset atau liabilitas tambahan yang diakui untuk mencerminkan informasi baru yang diperoleh tentang fakta dan keadaan yang ada pada tanggal akuisisi dan yang jika diketahui, akan berdampak pada jumlah yang diakui pada tanggal tersebut.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

When the Group has less than a majority of the voting or similar rights of a Subsidiary, the Group considers all relevant facts and circumstances in assessing whether it has power over a Subsidiary, including:

i) The contractual arrangement with the other vote holders of the Subsidiary,
ii) Rights arising from other contractual arrangements, and
iii) The Group's voting rights and potential voting rights.

The Group re-assesses whether or not it controls a Subsidiary if facts and circumstances indicate that there are changes to one or more of the three elements of control. Consolidation of a Subsidiary begins when the Group obtains control over the Subsidiary and ceases when the Group loses control of the Subsidiary. Assets, liabilities, income and expenses of a Subsidiary acquired during the year are included in the consolidated financial statements from the date the Group obtains the control up to the date of the Group ceases the control the Subsidiary.

The acquisition method is used to account for business combinations. The consideration transferred for the acquisition of a subsidiary is the fair value of the assets given, shares issued or liabilities incurred at the date of acquisition. The excess of the aggregate of the consideration transferred and the fair value of non-controlling interest over the net identifiable assets acquired and liabilities is recorded as goodwill. If this consideration is lower than the fair value of the net assets of the subsidiary acquired, the difference is recognised directly in the consolidated profit or loss.

If the initial accounting of a business combination is incomplete by the end of the reporting period in which the combination occurs, the Group reports provisional amounts for the items for which the accounting is incomplete. Those provisional amounts are adjusted during the measurement period, or additional assets or liabilities are recognised, to reflect new information obtained about facts and circumstances that existed as of the acquisition date that, if known, would have affected the amount recognised as of that date.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Untuk setiap akuisisi, Grup mengakui kepentingan non pengendali pada pihak yang diakuisisi baik sebesar nilai wajar atau sebesar bagian proporsional kepentingan non pengendali atas aset bersih pihak yang diakuisisi.

Biaya terkait akuisisi dibebankan pada saat terjadinya.

Seluruh saldo dan transaksi termasuk keuntungan/kerugian yang belum direalisasi antara BNI dan Entitas Anak yang signifikan dieliminasi untuk mencerminkan posisi keuangan dan hasil usaha konsolidasian BNI dan Entitas Anak sebagai satu kesatuan usaha.

Laporan keuangan konsolidasian disusun dengan menggunakan kebijakan akuntansi yang sama untuk peristiwa dan transaksi sejenis dalam kondisi yang sama. Apabila laporan keuangan Entitas Anak menggunakan kebijakan akuntansi yang berbeda dari kebijakan akuntansi yang digunakan dalam laporan keuangan konsolidasian, maka dilakukan penyesuaian yang diperlukan terhadap laporan keuangan Entitas Anak tersebut.

Kepentingan non pengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham non pengendali atas laba tahun berjalan dan ekuitas Entitas Anak tersebut sesuai dengan persentase kepemilikan pemegang saham non-pengendali pada Entitas Anak tersebut.

Entitas Asosiasi

Entitas asosiasi adalah seluruh entitas dimana Grup memiliki pengaruh signifikan namun bukan pengendalian, biasanya melalui kepemilikan hak suara antara 20% dan 50%. Investasi pada entitas asosiasi dicatat menggunakan metode ekuitas, setelah pada awalnya diakui pada nilai perolehan dikurangi kerugian penurunan nilai, jika ada.

Investasi pada entitas asosiasi pada awalnya diakui sebesar biaya perolehan. Biaya perolehan diukur berdasarkan nilai wajar aset yang diserahkan, instrumen ekuitas yang diterbitkan atau liabilitas yang timbul atau diambil alih pada tanggal akuisisi, ditambah biaya yang berhubungan langsung dengan akuisisi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

The Group recognises any non-controlling interests in the acquiree on an acquisition-by-acquisition-basis, either at fair value or at the non-controlling interest's proportionate share of the acquiree's net assets.

Acquisition-related costs are expensed as incurred.

All significant balances and transactions, including unrealised gains/losses among BNI and Subsidiaries are eliminated to reflect the consolidated financial position and results of operations of BNI and its Subsidiaries as a single entity.

The consolidated financial statements are prepared using uniform accounting policies for transactions and events in similar circumstances. If the Subsidiaries' financial statements use accounting policies different from those adopted in the consolidated financial statements, appropriate adjustments are made to the Subsidiaries' financial statements.

The non-controlling interest is presented in the equity of the consolidated statement of financial position and represents the non-controlling stockholders' proportionate share in the income for the year and equity of the Subsidiaries based on the percentage of ownership of the non-controlling stockholders in the Subsidiaries.

Associates

Associates are all entities over which the Group has significant influence but not control, generally accompanying a shareholding between 20% and 50% of the voting rights. Investment in associates are accounted for using the equity method of accounting, after initially being recognised at cost less impairment losses, if any.

Investment in an associate is initially recognised at cost. The cost of an acquisition is measured at the fair value of the assets transferred, equity instruments issued or liabilities incurred or assumed as at the date of acquisition, plus costs directly attributable to the acquisition.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Entitas Asosiasi (lanjutan)

Goodwill pada akuisisi entitas asosiasi merupakan selisih lebih yang terkait dengan biaya perolehan investasi pada entitas asosiasi dengan bagian Grup atas nilai wajar neto aset teridentifikasi dari entitas asosiasi dan dimasukkan dalam jumlah tercatat investasi.

Dalam menerapkan metode ekuitas, bagian Grup atas laba rugi entitas asosiasi setelah perolehan diakui dalam laba rugi, dan bagian Grup atas penghasilan komprehensif lain setelah tanggal perolehan diakui dalam penghasilan komprehensif lain.

Perubahan dan penerimaan distribusi dari entitas asosiasi setelah tanggal perolehan disesuaikan terhadap nilai tercatat investasi.

Jika bagian Grup atas rugi entitas asosiasi sama dengan atau melebihi kepentingannya pada entitas asosiasi, termasuk piutang tidak lancar tanpa jaminan, maka Grup menghentikan pengakuan bagiannya atas rugi lebih lanjut, kecuali Grup memiliki kewajiban untuk melakukan pembayaran atau telah melakukan pembayaran atas nama entitas asosiasi.

Keuntungan yang belum direalisasi atas transaksi antara Grup dengan entitas asosiasi dieliminasi sebesar bagian Grup dalam entitas asosiasi tersebut. Kerugian yang belum direalisasi juga dieliminasi kecuali transaksi tersebut memberikan bukti penurunan nilai atas aset yang ditransfer. Kebijakan akuntansi entitas asosiasi akan disesuaikan, apabila diperlukan, agar konsisten dengan kebijakan Grup.

Dividen yang akan diterima dari entitas asosiasi diakui sebagai pengurang jumlah tercatat investasi.

Pada setiap tanggal pelaporan, Grup menentukan apakah terdapat bukti objektif bahwa telah terjadi penurunan nilai atas investasi pada entitas asosiasi. Jika bukti tersebut ada, maka Grup menghitung besarnya penurunan nilai sebagai selisih antara jumlah yang terpulihkan dan nilai tercatat atas investasi pada entitas asosiasi dan mengakui selisih tersebut pada laba rugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

***Associates** (continued)*

Goodwill on acquisition of an associate represents the excess of the cost of acquisition of the associate over the Group's share of the fair value of the identifiable net assets of the associate and is included in the carrying amount of the investment.

In applying the equity method of accounting, the Group's share of its associate's post-acquisition profit or loss is recognised in profit or loss and its share of post-acquisition other comprehensive income is recognised in other comprehensive income.

These post-acquisition movements and distributions received from an associate are adjusted against the carrying amounts of the investment.

When the Group's share of the losses of an associate equals or exceeds its interest in the associate, including any other unsecured non-current receivables, the Group does not recognise further losses, unless it has obligations to make or has made payments on behalf of the associate.

Unrealised gains on transactions between the Group and its associate are eliminated to the extent of the Group's interest in the associate. Unrealised losses are also eliminated unless the transaction provides evidence of impairment of the asset being transferred. The accounting policies of the associate will be changed where necessary to ensure consistency with the accounting policies adopted by the Group.

Dividend receivables from an associate are recognised as reductions in the carrying amounts of the investment.

The Group determines at each reporting date whether there is any objective evidence that the investment in an associate is impaired. If any such evidence exists, the Group calculates the amount of impairment as the difference between the recoverable amount of the associate and its carrying value and recognises the amount in profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Prinsip konsolidasian (lanjutan)

Entitas Asosiasi (lanjutan)

Jika bagian kepemilikan entitas pada entitas asosiasi atau ventura bersama berkurang, tetapi investasi tetap diklasifikasikan masing-masing sebagai entitas asosiasi atau ventura bersama, maka entitas mereklasifikasi ke laba rugi proporsi keuntungan atau kerugian yang telah diakui sebelumnya dalam penghasilan komprehensif lain yang terkait dengan pengurangan bagian kepemilikan tersebut jika keuntungan atau kerugian tersebut disyaratkan untuk direklasifikasi ke laba rugi atas pelepasan aset atau liabilitas yang terkait.

e. Transaksi dalam mata uang asing dan penjabaran

Transaksi dalam mata uang asing

Pos-pos yang disertakan dalam laporan keuangan setiap entitas anggota Grup diukur menggunakan mata uang yang sesuai dengan lingkungan ekonomi utama di mana entitas beroperasi ("mata uang fungsional").

BNI dan Entitas Anak yang berdomisili di Indonesia menyelenggarakan pembukuannya dalam mata uang Rupiah, kecuali untuk BNI Remittance yang pembukuan akuntansinya dilakukan dalam Dolar Hongkong. Transaksi-transaksi dalam mata uang selain Rupiah yang terjadi di sepanjang tahun dicatat dengan nilai kurs yang berlaku pada saat terjadinya transaksi yang bersangkutan.

Laporan keuangan konsolidasian disajikan dalam Rupiah yang merupakan mata uang fungsional BNI.

Pada tanggal laporan posisi keuangan konsolidasian, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke dalam mata uang Rupiah dengan menggunakan kurs tengah Reuters pada pukul 15:00 WIB. Keuntungan atau kerugian yang timbul sebagai akibat dari penjabaran aset dan liabilitas moneter dalam mata uang asing dicatat dalam laporan laba rugi konsolidasian tahun berjalan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***d. Principles of consolidation** (continued)*

***Associates** (continued)*

If an entity's ownership interest in an associate or a joint venture is reduced, but the investment continues to be classified either as an associate or a joint venture respectively, the entity shall reclassify to profit or loss the proportion of the gain or loss that had previously been recognised in other comprehensive income relating to the reduction in ownership interest if that gain or loss would be required to be reclassified to profit or loss on the disposal of the related assets or liabilities.

e. Foreign currency transactions and translations

Transactions denominated in foreign currencies

Items included in the financial statements of each of the Group's entities are measured using the currency of the primary economic environment in which the entity operates (the "functional currency").

BNI and its Subsidiaries domiciled in Indonesia maintain their accounting records in Rupiah, except for BNI Remittance in which its accounting records are maintained in Hongkong Dollar. Transactions during the year involving currencies other than Rupiah are recorded at the exchange rates prevailing at the time the transactions were made.

The consolidated financial statements are presented in Rupiah, which is the functional currency of BNI.

At the consolidated statement of financial position date, all monetary assets and liabilities denominated in foreign currencies are translated to Rupiah using the Reuters middle rate at 15:00 Western Indonesian Time (WIB). The resulting gains or losses from the translation of monetary assets and liabilities in foreign currencies are recognised in the consolidated statement of profit or loss for the current year.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

e. Transaksi dalam mata uang asing dan penjabaran (lanjutan)

Penjabaran aset dan liabilitas dalam mata uang asing

Pada tanggal 31 Desember 2025 dan 2024, kurs mata uang asing yang digunakan untuk penjabaran mata uang asing terhadap Rupiah adalah sebagai berikut (dalam Rupiah penuh):

	31 Desember/ *December* 2025	**31 Desember/ *December* 2024**	
1 Pound Sterling Inggris	22,440	20,219	*Great Britain Pound Sterling 1*
1 Euro Eropa	19,571	16,758	*European Euro 1*
1 Dolar Amerika Serikat	16,675	16,095	*United States Dollar 1*
1 Dolar Singapura	12,965	11,845	*Singapore Dollar 1*
1 Dolar Australia	11,152	10,014	*Australian Dollar 1*
1 Dolar Hong Kong	2,142	2,073	*Hong Kong Dollar 1*
1 Yen Jepang	107	103	*Japanese Yen 1*

Penjabaran laporan keuangan sehubungan dengan konsolidasian laporan cabang BNI yang berkedudukan di luar negeri

Cabang BNI yang berkedudukan di luar negeri menyelenggarakan pembukuannya dalam mata uang negara tempat kedudukannya.

Untuk tujuan konsolidasian, laporan keuangan cabang BNI tersebut dijabarkan ke dalam mata uang Rupiah dengan cara sebagai berikut:

- Saldo akun-akun aset dan liabilitas dijabarkan dengan menggunakan kurs spot Reuters jam 15:00 WIB pada tanggal laporan posisi keuangan konsolidasian;
- Saldo akun-akun laba rugi setiap harinya dijabarkan dengan menggunakan kurs spot Reuters jam 15:00 WIB. Saldo untuk tahun berjalan merupakan jumlah dari penjabaran harian tersebut;
- Akun ekuitas dijabarkan dengan menggunakan kurs historis; dan
- Selisih yang timbul sebagai akibat dari penjabaran ini disajikan di laporan posisi keuangan konsolidasian sebagai bagian dari ekuitas pada akun "Selisih Kurs karena Penjabaran Laporan Keuangan dalam Mata Uang Asing".

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***e. Foreign currency transactions and translations** (continued)*

Translation of assets and liabilities denominated in foreign currencies

As of 31 December 2025 and 2024, the foreign currency exchange rates used for translation of foreign currencies to Rupiah are as follows (amounts in full Rupiah):

Translation of financial statements relating to consolidation of BNI branches domiciled outside of Indonesia

BNI's branches domiciled outside of Indonesia maintain their accounting records in their respective domestic currencies.

For consolidation purposes, the financial statements of such branches domiciled outside of Indonesia are translated into Rupiah as follows:

- *Assets and liabilities accounts are translated using the Reuters spot rates at 15:00 WIB at the consolidated statement of financial position date;*
- *Revenues and expenses accounts are translated using the daily Reuters spot rate at 15:00 WIB. The balances for the year represent the sum of those daily translations;*
- *Equity accounts are recorded using the historical rates; and*
- *Differences arising from translation are presented in the consolidated statement of financial position balance as part of equity under "Exchange Difference on Translation of Foreign Currency Financial Statements".*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Giro pada bank lain dan Bank Indonesia

Giro pada bank lain dan Bank Indonesia diklasifikasikan sebagai biaya perolehan yang diamortisasi. Giro pada bank lain dan Bank Indonesia dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

g. Penempatan pada bank lain dan Bank Indonesia

Penempatan pada bank lain dan Bank Indonesia terdiri dari *Deposit Facility* Bank Indonesia*, Term Deposit, call money* dan deposito berjangka.

Penempatan pada bank lain dan Bank Indonesia diklasifikasikan sebagai biaya perolehan yang diamortisasi. Penempatan pada bank lain dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi cadangan kerugian penurunan nilai.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

h. Efek-efek dan Obligasi Pemerintah

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia (SBI), Sertifikat Deposito Bank Indonesia, unit penyertaan reksa dana, obligasi, obligasi subordinasi, Sekuritas Rupiah Bank Indonesia (SRBI), saham yang dimiliki untuk diperdagangkan dan instrumen utang lainnya yang diperdagangkan di pasar uang dan pasar modal.

Obligasi Pemerintah terdiri dari Obligasi Rekapitalisasi Pemerintah yang diterbitkan kepada BNI dan bank lainnya berkaitan dengan program rekapitalisasi Pemerintah dan obligasi lainnya yang diterbitkan oleh Pemerintah Indonesia dan negara lainnya, yang tidak berkaitan dengan program rekapitalisasi, yang diperoleh melalui pasar perdana dan sekunder.

Pada saat pengakuan awal, efek-efek dan Obligasi Pemerintah dicatat sesuai dengan kategorinya, yaitu aset keuangan diklasifikasikan pada biaya perolehan yang diamortisasi, nilai wajar melalui penghasilan komprehensif lain atau nilai wajar melalui laba rugi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

f. Current accounts with other banks and Bank Indonesia

The current accounts with other banks and Bank Indonesia are classified as amortised cost. Current accounts with other banks and Bank Indonesia are stated at amortised cost using the effective interest rate method less allowance for impairment losses.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

g. Placements with other banks and Bank Indonesia

Placements with other banks and Bank Indonesia consist of Bank Indonesia Deposit Facility, Term Deposit, call money and time deposits.

Placements with other banks and Bank Indonesia are classified as amortised cost. Placements with other banks are stated at amortised cost using the effective interest rate method less allowance for impairment losses.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

h. Marketable securities and Government Bonds

Marketable securities consist of Certificates of Bank Indonesia (SBI), Certificates Deposits of Bank Indonesia, mutual fund units, bonds, subordinated bonds, Sekuritas Rupiah Bank Indonesia (SRBI), shares held-for-trading and other debt instruments traded in the money market and stock exchanges.

Government Bonds consist of Government Recapitalization Bonds issued to BNI and other banks with respect to the recapitalization program of the Government and other bonds issued by the Government of Indonesia and other countries, that are not related to the recapitalization program, acquired through the primary and secondary markets.

At initial recognition, the marketable securities and Government Bonds are recorded according to their category, i.e., amortised cost, fair value through other comprehensive income or at fair value through profit or loss.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

h. Efek-efek dan Obligasi Pemerintah (lanjutan)

Surat Berharga Syariah adalah surat bukti investasi berdasarkan prinsip syariah yang lazim diperdagangkan di pasar uang syariah dan/atau pasar modal syariah antara lain obligasi syariah (sukuk) dan surat berharga lainnya berdasarkan prinsip syariah.

Pada saat pengakuan awal, Grup mengakui investasi pada sukuk sebagai diukur pada biaya perolehan dan pada nilai wajar melalui penghasilan komprehensif lain sebesar nilai wajar ditambah atau dikurangi biaya transaksi terkait perolehan investasi tersebut. Sedangkan investasi pada sukuk ijarah dan sukuk mudharabah yang diukur pada nilai wajar melalui laba rugi diakui sebesar nilai wajar.

Grup menentukan klasifikasi investasi pada surat berharga, khususnya sukuk, berdasarkan model usaha yang ditentukan berdasarkan klasifikasi sesuai PSAK 410 (Revisi 2020) tentang “Akuntansi Sukuk" sebagai berikut:

- Surat berharga diukur pada biaya perolehan disajikan sebesar biaya perolehan (termasuk biaya investasi) yang disesuaikan dengan premi dan/atau diskonto yang belum diamortisasi. Premi dan diskonto diamortisasi selama periode hingga jatuh tempo.
- Surat berharga diukur pada nilai wajar melalui laba rugi, yang dinyatakan sebesar nilai wajar. Keuntungan atau kerugian yang belum direalisasi akibat kenaikan atau penurunan nilai wajarnya disajikan dalam laporan laba rugi periode yang bersangkutan.
- Surat berharga yang diukur pada nilai wajar melalui penghasilan komprehensif lainnya disajikan sebesar nilai wajar. Keuntungan atau kerugian yang belum direalisasi akibat kenaikan atau penurunan nilai wajarnya disajikan dalam penghasilan komprehensif lain. Premi dan diskonto diamortisasi selama periode hingga jatuh tempo.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***h. Marketable securities and Government Bonds** (continued)*

Sharia Securities are proof of investment based on sharia principles that are commonly traded in the sharia money market and/or sharia capital markets, including sharia bonds (sukuk) and other securities following sharia principles.

At initial recognition, the Group recognise investments in sukuk are stated at cost and measured at fair value through other comprehensive income at fair value add or less transaction cost related to acquisition investment. Whereas investment in sukuk ijarah and sukuk mudharabah are measured at fair value through profit and loss and recognised at fair value.

The Group defines the classification of investment in marketable securities, specifically sukuk, based on business model in accordance with SFAS 410 (Revised 2020) on "Accounting for Sukuk" as follows:

- *At cost securities are stated at cost (including transaction costs), adjusted by unamortised premium and/or discount. Premium and discount are amortised over the period until maturity.*
- *Securities are stated at fair values through profit or loss, and stated at fair value. Unrealised gains or losses from the increase or decrease in fair values are presented in current period profit or loss.*
- *At fair value through other comprehensive income securities are measured at fair value. Unrealised gains or losses from the increase or decrease in fair value are presented in other comprehensive income. Premium and discount are amortised over the period until maturity.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

i. Efek-efek yang dibeli/dijual dengan janji dijual/dibeli kembali

Efek-efek yang dibeli dengan janji untuk dijual kembali diklasifikasikan sebagai biaya perolehan yang diamortisasi.

Efek-efek yang dibeli dengan janji untuk dijual kembali disajikan sebagai aset dalam laporan posisi keuangan konsolidasian sebesar jumlah penjualan kembali dikurangi dengan pendapatan bunga yang belum diamortisasi dan cadangan kerugian penurunan nilai. Selisih antara harga beli dan harga jual kembali diperlakukan sebagai pendapatan bunga yang ditangguhkan, dan diakui sebagai pendapatan selama periode sejak efek-efek tersebut dibeli hingga dijual menggunakan suku bunga efektif.

Efek-efek yang dijual dengan janji untuk dibeli kembali diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan konsolidasian sebesar jumlah pembelian kembali, dikurangi dengan bunga dibayar di muka yang belum diamortisasi. Selisih antara harga jual dan harga beli kembali diperlakukan sebagai bunga dibayar di muka dan diakui sebagai beban bunga selama jangka waktu sejak efek-efek tersebut dijual hingga dibeli kembali menggunakan metode suku bunga efektif.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

j. Wesel ekspor dan tagihan lainnya

Wesel ekspor dan tagihan lainnya terdiri atas tagihan dari *Letters of Credit* dan Surat Kredit Berdokumen Dalam Negeri (SKBDN) kepada eksportir.

Wesel ekspor dan tagihan lainnya diklasifikasikan sebagai biaya perolehan yang diamortisasi.

Wesel ekspor dan tagihan lainnya dicatat pada biaya perolehan diamortisasi setelah dikurangi cadangan kerugian penurunan nilai.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

i. Securities purchased/sold under agreements to resell/repurchase

Securities purchased under agreements to resell are classified as amortised cost.

Securities purchased under agreements to resell are presented as assets in the consolidated statement of financial position, at the resale price net of unamortised interest income and allowance for impairment losses. The difference between the purchase price and the resale price is treated as unearned interest income, and recognised as income over the period starting from when those securities are purchased until they are sold using effective interest rate method.

Securities sold under agreements to repurchase are classified as financial liabilities measured at amortised cost.

Securities sold under agreements to repurchase are presented as liabilities in the consolidated statement of financial position, at the repurchase price, net of unamortised prepaid interest. The difference between the selling price and the repurchase price is treated as prepaid interest and recognised as interest expense over the period starting from when those securities are sold until they are repurchased using effective interest rate method.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

j. Bills and other receivables

Bills and other receivables consists of receivables from Letters of Credit and Domestic Documentary Letters of Credit to exporters.

Bills and other receivables are classified as amortised cost.

Bills and other receivables are stated at amortised cost less allowance for impairment losses.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

k. Instrumen keuangan derivatif

Dalam melakukan usaha bisnisnya, BNI melakukan transaksi instrumen keuangan derivatif seperti kontrak berjangka mata uang asing, *swap* mata uang asing, *swap* atas suku bunga, dan transaksi *spot* untuk mengelola eksposur pada risiko pasar seperti, risiko mata uang dan risiko tingkat suku bunga.

Instrumen keuangan derivatif diakui di laporan posisi keuangan konsolidasian pada nilai wajar. Setiap kenaikan nilai wajar kontrak derivatif dicatat sebagai aset apabila memiliki nilai wajar positif dan sebagai liabilitas apabila memiliki nilai wajar negatif.

Tagihan dan liabilitas derivatif diklasifikasikan sebagai aset dan liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi.

Keuntungan atau kerugian yang terjadi dari perubahan nilai wajar diakui dalam laporan laba rugi konsolidasian.

Nilai wajar instrumen derivatif ditentukan berdasarkan diskonto arus kas dan model penentu harga atau harga yang diberikan oleh *broker* (*quoted price*) atas instrumen lainnya yang memiliki karakteristik serupa.

Kontrak berjangka mata uang asing, *swap* mata uang asing dan *cross currency swap* dan *swap* tingkat suku bunga dilakukan untuk tujuan pendanaan dan perdagangan.

l. Pinjaman yang diberikan

Pinjaman yang diberikan

Pinjaman yang diberikan adalah penyediaan uang atau tagihan yang dapat disetarakan dengan itu, berdasarkan persetujuan atau kesepakatan pinjam-meminjam dengan debitur yang mewajibkan debitur untuk melunasi utang dan bunganya setelah jangka waktu tertentu, dan tagihan yang berasal dari fasilitas *trade finance* yang telah jatuh tempo yang belum diselesaikan dalam waktu 15 hari.

Pinjaman yang diberikan diklasifikasikan sebagai biaya perolehan yang diamortisasi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

k. Derivative financial instruments

In the normal course of its business, BNI enters into transactions involving derivative financial instruments such as foreign currency forward contracts, foreign currency swaps, interest rate swaps, and spot transactions to manage exposures on market risks, such as currency risk and interest rate risks.

Derivative financial instruments are recognised in the consolidated statement of financial position at fair value. Each increase in fair value derivative contract is carried as asset when the fair value is positive and as liability when the fair value is negative.

Derivative receivable and payable are classified as financial assets and liabilities at fair value through profit or loss.

Gains or losses resulting from fair value changes are recognised in the consolidated statement of profit or loss.

The fair value of derivative instruments is determined based on discounted cash flows and pricing models or quoted prices from brokers of other instruments with similar characteristics.

Foreign currency forward contracts, foreign currency swaps, and cross currency and interest rate swaps are for funding and trading purposes.

l. Loans

Loans

Loans represent funds provided or receivables that can be considered as equivalents thereof, based on agreements or financing contracts with borrowers, where borrowers are required to repay their debts with interest after a specified period, and matured trade finance facilities which have not been settled within 15 days.

Loans are classified as amortised cost.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

l. Pinjaman yang diberikan (lanjutan)

Pinjaman yang diberikan pada awalnya diukur pada nilai wajar ditambah dengan biaya transaksi yang dapat diatribusikan secara langsung untuk memperoleh aset keuangan tersebut, dan setelah pengakuan awal diukur pada biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi dengan cadangan kerugian penurunan nilai.

Pinjaman sindikasi dan pinjaman penerusan dicatat sesuai dengan porsi pinjaman yang risikonya ditanggung oleh Grup.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

m. Kontrak jaminan keuangan

Kontrak jaminan keuangan adalah kontrak yang mengharuskan penerbit untuk melakukan pembayaran yang ditetapkan untuk mengganti uang pemegang kontrak atas kerugian yang terjadi karena debitur tertentu gagal untuk melakukan pembayaran pada saat jatuh tempo, sesuai dengan ketentuan dari instrumen hutang. Jaminan keuangan tersebut diberikan kepada bank-bank, lembaga keuangan dan badan-badan lainnya atas nama debitur untuk menjamin kredit dan fasilitas-fasilitas perbankan lainnya.

Jaminan keuangan diakui awalnya sebesar nilai wajar pada tanggal jaminan diberikan. Nilai wajar dari jaminan keuangan pada saat dimulainya transaksi pada umumnya sama dengan provisi yang diterima untuk jaminan diberikan dengan syarat dan kondisi normal. Pendapatan provisi yang diperoleh diamortisasi selama jangka waktu jaminan menggunakan metode garis lurus.

Setelah pengakuan awal kontrak, jaminan keuangan dicatat pada nilai yang lebih tinggi antara nilai wajar amortisasi dengan nilai kerugian kredit ekspektasian sesuai PSAK 109 “Instrumen Keuangan”.

Cadangan kerugian penurunan nilai atas kontrak jaminan keuangan yang memiliki risiko kredit dihitung berdasarkan model kerugian ekspektasian.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***l. Loans** (continued)*

Loans are initially measured at fair value plus transaction costs that are directly attributable to obtain financial assets, and after initial recognition are measured at amortised cost based on the effective interest rate method less allowance for impairment losses.

Syndicated loans and two step loans are recorded according to the proportion of risks borne by the Group.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

m. Financial guarantee contracts

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 and other banking facilities.

Financial guarantees are initially recognised at fair value on the date the guarantee was given. The fair value of a financial guarantee at inception is likely to be equal to the premium received because all guarantees are agreed on arm’s length terms. The fee income earned is amortised over the period of guarantees using the straight line method.

After initial recognition of the contract, the financial guarantee is recorded at the higher of the amortised fair value and the expected credit loss value in accordance with SFAS 109 “Financial Instrument”.

Allowances for impairment on financial guarantee contracts with credit risk are calculated based on expected credit losses model.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

n. Tagihan dan liabilitas akseptasi

Tagihan akseptasi diklasifikasikan sebagai aset keuangan dalam kelompok biaya perolehan diamortisasi. Liabilitas akseptasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

o. Penyertaan saham

Penyertaan saham merupakan penanaman dana dalam bentuk saham pada perusahaan yang bergerak di bidang jasa keuangan untuk tujuan jangka panjang.

Investasi dengan persentase kepemilikan di bawah 20% dan tidak memiliki pengaruh signifikan yang diklasifikasikan sebagai aset keuangan yang dimiliki untuk dijual dicatat pada nilai wajar melalui laba rugi.

Investasi dengan persentase kepemilikan di bawah 20% dan tidak memiliki pengaruh signifikan yang diklasifikasikan sebagai aset keuangan yang dimiliki tidak untuk dijual dicatat pada nilai wajar melalui penghasilan komprehensif lain.

Penyertaan sementara pada perusahaan debitur timbul akibat konversi pinjaman yang diberikan menjadi saham. Pada saat pengakuan awal, saham yang diterima diakui dengan nilai wajar. Selanjutnya, saham tersebut dinilai dengan menggunakan metode ekuitas apabila BNI memiliki pengaruh signifikan terhadap *investees* dan diklasifikasikan sebagai aset keuangan apabila BNI tidak memiliki pengaruh signifikan terhadap *investees*.

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud

Aset tetap

Grup menerapkan kebijakan akuntansi model revaluasi untuk aset tetap berupa tanah dan bangunan. Untuk aset tetap selain tanah dan bangunan menggunakan model biaya.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

n. Acceptance receivables and payables

Acceptance receivables are classified as financial assets measured at amortised cost. Acceptance liabilities are classified as financial liabilities measured at amortised cost.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

o. Equity investments

Equity investments represent investments in the form of shares of stock, in companies engaged in financial services held for long-term purposes.

Investments with an ownership interest below 20% and have no significant influence classified as financial asset which held for sale is measured at fair value through profit or loss.

Investments with an ownership interest below 20% and have no significant influence classified as financial asset which are not held for sale are measured at fair value through other comprehensive income.

Temporary investments in debtor companies arise from conversion of loans to shares/equity. At initial recognition, shares received were recognised at fair value. Subsequently, the shares were recognised using equity method if BNI has significant influence over the investees or classified as financial asset if BNI does not have significant influence over the investees.

p. Fixed assets, right-of-use assets, lease liabilities and intangible assets

Fixed assets

Group applies revaluation model as accounting policy for land and buildings. For fixed assets other than land and buildings, it applies cost model.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset tetap (lanjutan)

Tanah dan bangunan disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan untuk bangunan. Penilaian terhadap tanah dan bangunan dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi. Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Nilai tercatat bruto disesuaikan dengan cara yang konsisten dengan nilai tercatat revaluasi aset. Sebagai contoh, nilai tercatat bruto dapat direvaluasi dengan mengacu pada data pasar yang dapat diobservasi atau dapat direvaluasi secara proporsional dengan perubahan nilai tercatat. Akumulasi penyusutan pada tanggal revaluasi disesuaikan dengan selisih antara nilai tercatat bruto dan nilai tercatat aset setelah memperhitungkan akumulasi kerugian penurunan nilai.

Jika nilai wajar dari aset yang direvaluasi mengalami perubahan yang signifikan, maka perlu direvaluasi secara tahunan, sedangkan jika nilai wajar dari aset yang direvaluasi tidak mengalami perubahan yang signifikan, maka perlu dilakukan revaluasi paling kurang 3 tahun sekali.

Kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Cadangan Revaluasi Aset" dan disajikan sebagai "Penghasilan Komprehensif Lain". Penurunan nilai tercatat yang timbul dari revaluasi dicatat sebagai beban pada tahun berjalan. Apabila aset tersebut memiliki saldo "Keuntungan Revaluasi Aset Tetap" yang disajikan sebagai "Penghasilan Komprehensif Lain" maka selisih penurunan nilai tercatat tersebut dibebankan terhadap "Keuntungan Revaluasi Aset Tetap" yang disajikan sebagai "Penghasilan Komprehensif Lain'' dan sisanya diakui sebagai beban tahun berjalan.

Aset tetap selain tanah dan bangunan disajikan sebesar harga perolehan dikurangi dengan akumulasi penyusutan.

Biaya perolehan termasuk biaya penggantian bagian aset tetap saat biaya tersebut terjadi jika memenuhi kriteria pengakuan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

***Fixed assets** (continued)*

Land and buildings are shown at fair value, less accumulated depreciation for buildings. Valuation of land and buildings are performed by certified external independent valuers with certain qualification. Valuations are performed with sufficient regularity to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. The gross carrying amount is adjusted in a manner that is consistent with the revaluation of the carrying amount of the asset. For example, the gross carrying amount may be revalued by reference to observable market data or it may be revalued proportionately to the change in the carrying amount. The accumulated depreciation at the date of the revaluation is adjusted to equal the difference between the gross carrying amount and the carrying amount of the assets after taking into account accumulated impairment losses.

If the fair value of the revalued asset change significantly, it is necessary to revaluate on an annual basis, whereas if the fair value of the revaluated asset does not change significantly, it is necessary to revaluate at a minimum every 3 years.

Increases in the carrying amount arising on revaluation of land and building is recorded in "Asset Revaluation Reserve" and presented as "Other Comprehensive Income". Decreases in carrying amount as the result of revaluation is recorded as expense in the current year. If the asset has a balance on its "Gain on Revaluation of Fixed Assets", loss from revaluation of fixed asset is charged to "Gain on Revaluation of Fixed Assets" which is presented as "Other Comprehensive Income" and the rest of the amount is charged to current year's expenses.

Fixed assets besides land and buildings are stated at historical cost less accumulated depreciation.

Cost includes the replacement cost of a part of the fixed assets when the expenditure meets the criteria for recognition.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset tetap (lanjutan)

Semua biaya pemeliharaan dan perbaikan yang tidak memenuhi kriteria untuk dikapitalisasi diakui dalam laporan laba rugi pada saat terjadinya. Pada setiap akhir tahun buku, nilai residu, umur manfaat, dan metode penyusutan ditelaah kembali dan jika sesuai dengan keadaan, disesuaikan secara prospektif.

Semua aset tetap kecuali tanah, disusutkan berdasarkan metode garis lurus selama estimasi masa manfaat aset tersebut sebagai berikut:

	Tarif Penyusutan/ *Depreciation Rate*	**Tahun/*Years***	
Bangunan	6.67%	15	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	20.00%	5	*Office equipment and motor vehicles*

Perlengkapan kantor terdiri dari perabotan dan perlengkapan, instalasi, Anjungan Tunai Mandiri (ATM), perangkat lunak dan perangkat keras komputer, peralatan komunikasi dan peralatan kantor lainnya.

Grup menganalisa fakta dan keadaan untuk masing-masing jenis hak atas tanah dalam menentukan akuntansi untuk masing-masing hak atas tanah tersebut sehingga dapat merepresentasikan dengan tepat suatu kejadian atau transaksi ekonomi yang mendasarinya. Jika hak atas tanah tersebut tidak mengalihkan pengendalian atas aset pendasar kepada Grup, melainkan mengalihkan hak untuk menggunakan aset pendasar, Grup menerapkan perlakuan akuntansi atas transaksi tersebut sebagai sewa berdasarkan PSAK 116 “Sewa”, kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Grup menerapkan PSAK 216 “Aset Tetap”.

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, yang ditentukan sebagai nilai tertinggi antara harga jual neto dan nilai yang dipakai.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai perolehan dan akumulasi penyusutannya dihapuskan dari akun tersebut. Keuntungan atau kerugian yang terjadi diakui dalam laporan laba rugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

***Fixed assets** (continued)*

All maintenance and repair costs which do not fulfill the capitalization criteria, are recognised in profit or loss upon occurrence. At each financial year end, the assets’ residual values, useful life, and methods of depreciation are reviewed, and adjusted prospectively as appropriate.

All fixed assets, except land, are depreciated using the straight-line method over their expected useful lives as follows:

Office equipment consists of furniture and fixtures, installation, Automatic Teller Machines (ATM), computer software and hardware, communication and other office equipment.

The Group analyses the facts and circumstances for each type of land rights in determining the accounting for each of these land rights so that it can accurately represent an underlying economic event or transaction. If the landrights do not transfer control of the underlying assets to the Group, but gives the rights to use the underlying assets, the Group applies the accounting treatment of these transactions as leases under SFAS 116 “Leases”, except if landrights substantially similar to land purchases, the Group applies SFAS 216 “Property, Plant and Equipment”.

When the carrying amount of an asset is greater than its estimated recoverable amount, it is written down to its recoverable amount, which is determined as the higher of the net selling price or value in use.

When fixed assets are retired or disposed of, their costs and the related accumulated depreciation are derecognised from the accounts. Any resulting gain or loss is recognised in profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset tetap (lanjutan)

Akumulasi biaya konstruksi aset tetap dikapitalisasi dan dicatat sebagai "Aset dalam Pembangunan". Biaya tersebut direklasifikasi ke akun aset tetap yang terkait pada saat proses konstruksi atau pemasangan telah selesai.

Aset hak-guna dan liabilitas sewa

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. Grup dapat memilih untuk tidak mengakui aset hak-guna dan liabilitas sewa untuk:

- Sewa dengan jangka waktu kurang atau sama dengan 12 bulan dan tidak terdapat opsi beli;
- Sewa atas aset dengan nilai rendah.

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Grup harus menilai apakah:

- Grup memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan
- 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:
  1. Grup memiliki hak untuk mengoperasikan aset; dan
  2. Grup telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

p. Fixed assets, right-of-use assets, lease liabilities and intangible assets *(continued)*

Fixed assets *(continued)*

The accumulated costs of construction of fixed assets are capitalised and recognised as "Construction in Progress". These costs are reclassified to the related fixed asset account when the construction or installation is completed.

Right-of-use assets and lease liabilities

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. The Group can choose not to recognise the right-of-use assets and lease liabilities for:

- *Leases with a term of less or equal to 12 months and there is no call option;*
- *Leases of low value assets.*

To assess whether a contract conveys the right to control the use of an identified asset, the Group shall assess whether:

- *The Group has the right to obtain substantially all the economic benefit from use of the asset throughout the period of use; and*
- *The Group has the right to direct the use of the asset. The Group has described when it has a decision-making right 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; and*
  2. *The Group has designed the asset in a way that predetermine how and for what purposes it will be used.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset hak-guna dan liabilitas sewa (lanjutan)

Pada tanggal permulaan sewa, Grup mengakui aset hak-guna dan liabilitas sewa. Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan. Aset hak-guna diamortisasi dengan menggunakan metode garis lurus sepanjang jangka waktu sewa.

Liabilitas sewa diukur pada nilai kini pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan dengan menggunakan suku bunga implisit dalam sewa atau jika suku bunga tersebut tidak dapat ditentukan, maka menggunakan suku bunga pinjaman inkremental. Pada umumnya, Grup menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

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 aset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

Modifikasi sewa

Grup mencatat modifikasi sewa sebagai sewa terpisah jika:
- Modifikasi meningkatkan ruang lingkup sewa dengan menambahkan hak untuk menggunakan satu aset pendasar atau lebih;
- Imbalan sewa meningkat sebesar jumlah yang setara dengan harga tersendiri untuk peningkatan dalam ruang lingkup dan penyesuaian yang tepat pada harga tersendiri tersebut untuk merefleksikan kondisi kontrak tertentu.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

***Right-of-use assets and lease liabilities** (continued)*

The Group recognises a right-of-use asset and a lease liability at the lease commencement date. The right-of-use assets is initially measured at cost, which comprises the initial amount of the leases liability adjusted for any leases payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use assets is amortised over the straight-line method throughout the lease term.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, using incremental borrowing rate. Generally, the Group uses its incremental borrowing rate as a discount rate.

Each lease payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the leases period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

If the lease transfers ownership of the underlying asset to the Group by the end of the leases 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 asset 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 leases term.

Lease modification

The Group account for a lease modification as a separate lease if both:
- *The modification increases the scope of the lease by adding the right to use one or more underlying assets;*
- *The consideration for the lease increases by an amount commensurate with the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Aset tetap, aset hak-guna, liabilitas sewa dan aset takberwujud (lanjutan)

Aset takberwujud

Aset takberwujud diakui jika, dan hanya jika, biaya perolehan aset tersebut dapat diukur secara andal dan kemungkinan besar Grup akan memperoleh manfaat ekonomis masa depan dari aset tersebut. Aset takberwujud terdiri dari *goodwill*, hubungan pelanggan dan merek dagang yang diperoleh pada saat akuisisi.

Lihat Catatan 2d untuk kebijakan akuntansi terkait *goodwill.*

q. Agunan yang diambil alih

Agunan yang diambil alih disajikan dalam akun "Aset lain-lain".

Agunan yang diambil alih (AYDA) adalah aset yang diperoleh Grup, baik melalui pelelangan maupun diluar pelelangan berdasarkan penyerahan secara sukarela oleh pemilik agunan atau berdasarkan kuasa untuk menjual diluar lelang dari pemilik agunan dalam hal debitur tidak memenuhi liabilitasnya kepada Grup. AYDA merupakan jaminan kredit yang diberikan yang telah diambil alih sebagai bagian dari penyelesaian kredit yang diberikan dan disajikan pada "Aset lain-lain".

Agunan yang diambil alih diakui sebesar nilai neto yang dapat direalisasi atau sebesar nilai *outstanding* kredit yang diberikan, mana yang lebih rendah. Nilai neto yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai neto yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset. Selisih antara nilai agunan yang diambil alih dengan hasil penjualan diakui sebagai keuntungan atau kerugian pada saat penjualan.

Beban-beban yang berkaitan dengan pemeliharaan agunan yang diambil alih dibebankan dalam laporan laba rugi pada saat terjadinya.

Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***p. Fixed assets, right-of-use assets, lease liabilities and intangible assets** (continued)*

Intangible Assets

Intangible assets are recognised if, and only if the cost of the asset can be measured reliably and it is probable that the Group will obtain future economic benefits from the asset. Intangible assets consist of goodwill, customer relationships and trademarks acquired by the Group at acquisition.

Refer to Note 2d for the accounting policies of goodwill.

q. Foreclosed collaterals

Foreclosed collaterals are included in the "Other assets" account.

Foreclosed collaterals represent assets acquired by the Group, both from auction and non auction based on voluntary transfer by the debtor or based on debtor's approval to sell the collateral where the debtor could not fulfill their obligations to the Group. Foreclosed collaterals represent loan collateral that were taken over as part of loans settlement and presented in "Other assets".

Foreclosed collaterals are stated at net realizable value or stated at loan outstanding amount, whichever is lower. Net realizable value is the fair value of the foreclosed collaterals less the estimated costs to sell the assets. The excess of loan receivable over the net realizable value of the foreclosed collateral is charged to allowance for impairment losses. The difference between the recorded amount of the foreclosed collateral and the proceeds from the sale of such collateral is recorded as a gain or loss at the time of sale.

Maintenance and repair costs related to foreclosed collaterals are charged as an expense in profit or loss when incurred.

If there is permanent decline in value, the carrying amount of foreclosed collaterals is written down to recognise such permanent decline in value and any losses from such write-down is recognised in profit or loss.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

r. Liabilitas segera

Liabilitas segera dicatat pada saat liabilitas kepada masyarakat maupun kepada bank lain timbul.

Akun ini diklasifikasikan sebagai liabilitas keuangan lain dan dihitung berdasarkan biaya perolehan diamortisasi.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

s. Simpanan nasabah

Tabungan merupakan simpanan nasabah di BNI dan Entitas Anak yang bergerak di bidang perbankan yang penarikannya hanya dapat dilakukan melalui *counter* dan Anjungan Tunai Mandiri (ATM) atau dengan cara pemindahbukuan melalui *SMS Banking, Phone Banking, Mobile Banking* dan *Internet Banking* jika memenuhi persyaratan yang disepakati, tetapi penarikan tidak dapat dilaksanakan dengan menggunakan cek atau instrumen setara lainnya.

Deposito berjangka merupakan simpanan nasabah di BNI dan Entitas Anak yang bergerak di bidang perbankan yang penarikannya hanya dapat dilakukan pada waktu tertentu sesuai dengan perjanjian antara nasabah dengan BNI dan Entitas Anak yang bergerak di bidang perbankan.

Simpanan nasabah diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi menggunakan metode suku bunga efektif. Biaya tambahan yang dapat diatribusikan secara langsung dengan perolehan simpanan nasabah dikurangkan dari jumlah simpanan yang diterima.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

t. Simpanan dari bank lain

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain baik lokal maupun luar negeri, dalam bentuk giro, *inter-bank call money* dengan periode jatuh tempo menurut perjanjian kurang dari atau 90 hari, deposito berjangka dan sertifikat deposito.

Simpanan dari bank lain diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Biaya tambahan yang dapat diatribusikan secara langsung dengan perolehan simpanan dari bank lain dikurangkan dari jumlah simpanan yang diterima.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

r. Obligations due immediately

Obligations due immediately are recorded at the time obligations to public customers or other banks arise.

This account is classified as other financial liabilities and is measured at amortised cost.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

s. Deposits from customers

Savings account represent deposits of customers in BNI and a Subsidiary engaged in banking that may only be withdrawn over the counter and via ATMs or funds transfers by SMS Banking, Phone Banking, Mobile Banking and Internet Banking when certain agreed conditions are met, but which may not be withdrawn by cheque or other equivalent instruments.

Time deposits represent customer's deposits in BNI and a Subsidiary engaged in banking that may be withdrawn at a certain time based on the agreement between the depositor and BNI and a Subsidiary engaged in banking.

Deposits from customers are classified as other financial liabilities which are measured at amortised cost using effective interest rate method. Incremental costs directly attributable to the acquisition of deposits from customers are deducted from the amount of deposits.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

t. Deposits from other banks

Deposits from other banks represent liabilities to local and overseas banks, in the form of current accounts, inter-bank call money with original maturities of 90 days or less, time deposits and certificates of deposits.

Deposits from other banks are classified as other financial liabilities which are measured at amortised cost using effective interest rate method. Incremental costs directly attributable to the acquisition of deposits from other banks are deducted from the amount of deposits.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

t. Simpanan dari bank lain (lanjutan)

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

u. Efek-efek yang diterbitkan

Efek-efek yang diterbitkan terdiri dari obligasi yang diterbitkan oleh Grup.

Efek-efek yang diterbitkan diklasifikasikan sebagai liabilitas keuangan lain yang diukur dengan biaya perolehan diamortisasi. Biaya tambahan yang dapat diatribusikan secara langsung dengan penerbitan efek dikurangkan dari jumlah efek-efek yang diterbitkan.

Obligasi yang diterbitkan dicatat sebesar nilai nominal dikurangi saldo diskonto yang belum diamortisasi. Biaya-biaya yang terjadi sehubungan dengan penerbitan obligasi dicatat sebagai pengurang hasil emisi dan diamortisasi selama jangka waktu obligasi dengan menggunakan metode suku bunga efektif.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

v. Pinjaman yang diterima

Pinjaman diterima merupakan dana yang diterima dari bank lain, Bank Indonesia atau pihak lain dengan liabilitas pembayaran kembali sesuai dengan persyaratan perjanjian pinjaman.

Pinjaman diterima diakui sebesar nilai wajar pada awalnya dan selanjutnya diukur sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Biaya perolehan diamortisasi dihitung dengan memperhitungkan adanya diskonto atau premi terkait dengan pengakuan awal pinjaman diterima dan biaya transaksi merupakan bagian tidak terpisahkan dari metode suku bunga efektif.

Lihat Catatan 2c untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

w. Pendapatan bunga dan beban bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan yang dikenakan suku bunga diakui pada laporan laba rugi dengan menggunakan metode suku bunga efektif.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***t. Deposits from other banks** (continued)*

Refer to Note 2c for the accounting policies of financial assets and liabilities.

u. Securities issued

Securities issued consist of bonds issued by the Group.

Securities issued are classified as other financial liabilities which are measured at amortised cost. Incremental costs directly attributable to the issuance of marketable securities are deducted from the amount of securities issued.

Bonds issued are presented at nominal value net of unamortised discount. Costs incurred related to the bond issuance are presented as deduction from the proceeds of bonds issued and amortised over the term of the bonds using the effective interest rate method.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

v. Borrowings

Borrowings are funds received from other bank, Bank Indonesia or other parties with payment obligation based on borrowings agreement.

Borrowings are initially recognised at fair value and subsequently measured at amortised cost using the effective interest rate method. Amortised cost is calculated by taking into account any discount or premium related to the initial recognition of borrowings and transaction costs are an integral part of the effective interest rate method.

Refer to Note 2c for the accounting policies of financial assets and liabilities.

w. Interest income and interest expense

Interest income and expense for all interest-bearing financial instruments are recognised in profit or loss using the effective interest rate method.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

w. Pendapatan bunga dan beban bunga (lanjutan)

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau, jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat bersih dari instrumen keuangan atau liabilitas keuangan. Pada saat menghitung suku bunga efektif, Grup mengestimasi arus kas di masa yang akan datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, tetapi tidak mempertimbangkan kerugian kredit di masa mendatang. Perhitungan ini yang mencakup seluruh komisi, provisi, dan bentuk lain diterima oleh para pihak dalam kontrak yang merupakan bagian tidak terpisahkan dari suku bunga efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

Kredit yang pembayaran angsuran pokok atau bunganya telah lewat 90 hari atau lebih setelah jatuh tempo, atau kredit yang pembayarannya secara tepat waktu diragukan, secara umum diklasifikasikan sebagai kredit yang mengalami penurunan nilai (*impairment*).

x. Pendapatan provisi dan komisi

Pendapatan provisi dan komisi yang berkaitan langsung dengan kegiatan pinjaman, atau pendapatan provisi dan komisi yang berhubungan dengan jangka waktu tertentu, diamortisasi sesuai dengan jangka waktu kontrak menggunakan metode suku bunga efektif dan diklasifikasikan sebagai bagian dari pendapatan bunga pada laporan laba rugi.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian kredit atau suatu jangka waktu diakui sebagai pendapatan pada saat terjadinya transaksi sebagai pendapatan operasional lainnya.

y. Kontrak asuransi

i. Lingkup dan klasifikasi kontrak asuransi

Suatu kontrak diklasifikasikan sebagai kontrak asuransi apabila kontrak tersebut menerima risiko asuransi yang signifikan dari pihak lain (pemegang polis). Risiko asuransi dianggap signifikan apabila kejadian yang diasuransikan dan bersifat tidak pasti dapat menyebabkan Grup menanggung pembayaran tambahan yang substansial dalam skenario yang memiliki substansi komersial.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***w. Interest income and interest expense** (continued)*

The effective interest rate is the rate that exactly discounts the estimated future cash payments or receipts through the expected life of the financial assets and financial liabilities (or, where appropriate, a shorter period) to the carrying amount of the financial asset or financial liability. When calculating the effective interest rate, the Group estimates future cash flows considering all contractual terms of the financial instrument but not future credit losses. This calculation includes all commissions, fees, and other forms received by the parties in the contract are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Loans for which the principal or interest has been past due for 90 days or more, or where reasonable doubt exists as to its timely collection, are generally classified as impaired loans.

x. Fees and commission income

Fees and commissions directly related to lending activities, or fee and commission income which relates to a specific period, is amortised over the term of contract using the effective interest rate method and classified as part of interest income in profit or loss.

Fees and commissions income which are not related to lending activities or a specific period are recognised as revenues on the transaction date as other operating income.

y. Insurance contracts

i. Scope and classification of insurance contract

A contract is classified as an insurance contract when it accepts significant insurance risk from another party (the policyholder). Insurance risk is considered significant when the occurrence of uncertain insured events could result in the Group incurring substantial additional payments in scenarios that possess commercial substance.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

ii. Tingkat agregasi

Kontrak asuransi

Grup mengakui kelompok kontrak asuransi yang diterbitkannya dari yang paling awal di antara yang berikut:
- Awal periode pertanggungan dari kelompok kontrak;
- Tanggal ketika pembayaran pertama dari pemegang polis dalam kelompok jatuh tempo atau ketika pembayaran pertama diterima jika tidak ada tanggal jatuh tempo; dan
- Untuk kelompok kontrak yang merugi, segera setelah fakta dan keadaan menunjukkan bahwa kelompok tersebut merugi.

Kontrak asuransi digabungkan ke dalam kelompok kontrak untuk tujuan pengukuran. Kelompok kontrak ditentukan dengan mengidentifikasi portofolio kontrak asuransi, yang masing-masing terdiri dari kontrak dengan risiko serupa dan dikelola secara bersama-sama. Setiap portofolio kemudian dibagi ke dalam kohort tahunan, dan setiap kohort tahunan dibagi lagi menjadi tiga kelompok berdasarkan profitabilitas kontrak:

- kontrak yang merugi pada saat pengakuan awal;
- kontrak yang, pada saat pengakuan awal, tidak memiliki kemungkinan signifikan untuk menjadi merugi di kemudian hari; dan
- kontrak lainnya dalam portofolio.

Pada saat kontrak diakui, kontrak tersebut ditambahkan ke dalam kelompok kontrak yang sudah ada atau, jika kontrak tersebut tidak memenuhi syarat untuk dimasukkan ke dalam kelompok yang ada, maka kontrak tersebut membentuk kelompok baru yang akan ditambahkan kontrak-kontrak berikutnya. Kelompok kontrak ditetapkan pada saat pengakuan awal dan komposisinya tidak direvisi setelah semua kontrak telah ditambahkan ke dalam kelompok.

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

y. Insurance contracts *(continued)*

ii. Level of aggregation

Insurance contract

The Group recognises groups of insurance contracts that it issues from the earliest of the following:
- *The beginning of the coverage period of the group of contracts;*
- *The date when the first payment from a policyholder in the group is due or when the first payment is received if there is no due date; and*
- *For a group of onerous contracts, as soon as facts and circumstances indicate that the group is onerous.*

Insurance contracts are aggregated into groups of contracts for measurement purposes. Groups of contracts are determined by identifying portfolios of insurance contracts, each comprising contracts subject to similar risks and managed together. Each portfolio is then divided into annual cohorts and each annual cohort is further divided into three groups based on the profitability of contracts:

- *any contracts that are onerous on initial recognition;*
- *any contracts that, on initial recognition, have no significant possibility of becoming onerous subsequently; and*
- *any remaining contracts in the portfolio.*

When the contract is recognised, it is added to an existing group of contracts or, if the contract does not qualify for inclusion in an existing group, it forms a new group to which future contracts are added. Groups of contracts are established on initial recognition and their composition is not revised once all contracts have been added to the group.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

iii. Arus kas pemenuhan dalam batasan kontrak

Arus kas pemenuhan terdiri dari:

- estimasi arus kas masa depan;
- penyesuaian untuk mencerminkan nilai waktu uang dan risiko keuangan terkait arus kas masa depan, sejauh risiko keuangan tersebut belum termasuk dalam estimasi arus kas masa depan; dan
- penyesuaian risiko untuk risiko non-keuangan.

Seluruh arus kas masa depan dalam batasan kontrak dimasukkan ke dalam arus kas pemenuhan dari kelompok kontrak asuransi dan kontrak reasuransi milikan.

Arus kas berada dalam batas kontrak asuransi (dan kontrak reasuransi milikan) jika berasal dari hak dan kewajiban substantif yang ada, di mana Grup dapat memaksa pemegang polis untuk membayar premi (atau diwajibkan membayar kepada reasuradur), atau memiliki kewajiban substantif untuk memberikan jasa kepada pemegang polis (atau hak substantif untuk menerima jasa dari reasuradur).

Untuk kontrak asuransi, kewajiban substantif untuk memberikan jasa berakhir ketika:

- Grup memiliki kemampuan praktis untuk menilai kembali risiko dan, sebagai hasilnya, dapat menetapkan harga atau tingkat manfaat baru yang sepenuhnya mencerminkan risiko tersebut; atau
- Grup memiliki kemampuan praktis untuk menilai kembali risiko portofolio yang berisi kontrak tersebut dan dapat menetapkan harga atau tingkat manfaat yang sepenuhnya mencerminkan risiko portofolio tersebut; dan penetapan harga premi untuk pertanggungan hingga tanggal penilaian ulang tidak mempertimbangkan risiko yang berkaitan dengan periode setelah tanggal penilaian ulang.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contracts** (continued)*

iii. Fulfilment cash flows within the contract boundaries

Fulfilment cash flows comprise:

- *estimates of future cash flows;*
- *an adjustment to reflect the time value of money and the financial risks related to future cash flows, to the extent that the financial risks are not included in the estimates of future cash flows; and*
- *a risk adjustment for non-financial risk.*

All future cash flows within the contractual boundaries are included in the fulfillment of cash flows of the group of insurance contracts and reinsurance contracts held.

Cash flows are within the boundary of an insurance contract (and a reinsurance contract held) if they arise from substantive rights and obligations that exist in which the Group can force the policyholder to pay the premiums (or is compelled to pay amounts to a reinsurer) or has a substantive obligation to provide services to the policyholder (or a substantive right to receive services from a reinsurer).

For insurance contracts, a substantive obligation to provide services ends when:

- *the Group has the practical ability to reassess the risks and as a result, can set a new price or level of benefits that fully reflects those risks; or*
- *the Group has the practical ability to reassess the risks of the portfolio that contains the contract and can set a price or level of benefits that fully reflects the risks of that portfolio; and the pricing of the premiums for coverage up to the reassessment date does not take into account risks that relate to periods after the reassessment date.*

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

iii. Arus kas pemenuhan dalam batasan kontrak (lanjutan)

Untuk kontrak reasuransi milikan, hak substantif untuk menerima jasa berakhir ketika:

- reasuradur memiliki kemampuan praktis untuk menilai kembali risiko yang dialihkan kepadanya dan dapat menetapkan harga atau tingkat manfaat baru yang sepenuhnya mencerminkan risiko tersebut; atau
- reasuradur dapat menghentikan pertanggungan.

Batas kontrak dinilai ulang pada setiap tanggal pelaporan untuk mencerminkan perubahan keadaan yang memengaruhi hak dan kewajiban substantif Grup, sehingga batas tersebut dapat berubah seiring waktu.

iv. Arus kas akuisisi asuransi

Arus kas akuisisi asuransi dialokasikan ke kelompok kontrak menggunakan metode alokasi yang sistematis, dengan mempertimbangkan secara objektif semua informasi yang wajar dan dapat didukung yang tersedia tanpa biaya atau upaya yang berlebihan. Pada setiap tanggal pelaporan, Grup meninjau kembali jumlah yang dialokasikan ke kelompok kontrak untuk mencerminkan setiap perubahan asumsi yang menentukan input dari metode alokasi yang digunakan. Jumlah yang telah dialokasikan ke suatu kelompok tidak akan direvisi setelah seluruh kontrak dimasukkan ke dalam kelompok tersebut.

v. Model pengukuran

<u>General Measurement Model (GMM)</u>

General Measurement Model ("GMM") adalah model pengukuran standar yang terdiri dari arus kas pemenuhan dan margin jasa kontraktual.

Arus kas pemenuhan mewakili nilai sekarang yang disesuaikan dengan risiko dari hak dan kewajiban Grup kepada pemegang polis, yang mencakup estimasi arus kas yang diharapkan, diskonto, dan penyesuaian risiko atas risiko non-keuangan.

Margin jasa kontraktual mewakili laba yang belum diakui dari kontrak yang sedang berjalan yang akan diakui oleh entitas saat memberikan jasa selama periode pertanggungan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contracts** (continued)*

***iii. Fulfilment cash flows within the contract boundaries** (continued)*

For reinsurance contracts held, a substantive right to receive services ends when:

- *the reinsurer has the practical ability to reassess the risk transferred to it and can set a new price or level of benefits that fully reflects those risks; or*
- *the reinsurer can terminate coverage.*

The contract boundary is reassessed at each reporting date to include the effect of changes in circumstances on the Group's substantive rights and obligations and, therefore, may change over time.

iv. Insurance acquisition cash flows

Insurance acquisition of cash flows is allocated to groups of contracts using a systematic allocation method and considering, in an unbiased way, all reasonable and supportable information that is available without undue cost or effort. At each reporting date, the Group revises the amounts allocated to groups to reflect any changes in assumptions that determine the inputs to the allocation method used. The amounts allocated to a group are not revised once all contracts have been added to the group.

v. Measurement model

<u>General Measurement Model</u>

The General Measurement Model ("GMM") is the default measurement model which consists of fulfillment of cash flows and contractual service margin.

The fulfillment of cash flows represents the risk-adjusted present value of a Group's rights and obligations to the policyholders, comprising estimates of expected cash flows, discounting and risk adjustment for non-financial risk.

Contractual service margin represents the unearned profit from in-force contracts that an entity will recognise as it provides services over the coverage period.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

v. Model pengukuran (lanjutan)

Variable Fee Approach

Variable Fee Approach ("VFA") adalah modifikasi wajib dari *General Measurement Model* mengenai perlakuan terhadap margin jasa kontraktual untuk mengakomodasi kontrak partisipasi langsung.

Fitur partisipasi langsung diidentifikasi pada saat awal, di mana Grup memiliki kewajiban untuk membayar pemegang polis jumlah yang setara dengan nilai wajar dari *item* dasar dikurangi biaya variabel sebagai imbalan atas jasa investasi yang disediakan.

Premium allocation approach

Premium Allocation Approach ("PAA") adalah pendekatan yang disederhanakan yang diterapkan oleh Grup untuk kontrak asuransi dan kontrak reasuransi yang memiliki periode tidak lebih dari 1 tahun.

Pengukuran liabilitas untuk klaim yang terjadi adalah identik di antara ketiga model pengukuran, kecuali untuk penentuan suku bunga tetap yang digunakan untuk diskonto.

vi. Kontrak yang merugi

Kontrak diakui sebagai kontrak yang merugi jika diperkirakan akan menimbulkan kerugian pada saat dimulainya kontrak. Kontrak-kontrak dikelompokan secara terpisah dan kerugian yang diperkirakan terjadi akan diakui dalam laporan laba rugi konsolidasian.

Berdasarkan kebijakan akuntansi dan penilaian awal dari Manajemen, terdapat fakta dan keadaan yang mengindikasikan bahwa sekelompok kontrak asuransi menjadi merugi.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contracts** (continued)*

***v. Measurement model** (continued)*

Variable Fee Approach

Variable Fee Approach ("VFA") is a mandatory modification of the General Measurement Model regarding the treatment of the contractual service margin in order to accommodate direct participating contracts.

The direct participating feature is identified at inception, where the Group has the obligation to pay the policyholder an amount equal to the fair value of the underlying items less a variable fee in exchange for investment services provided.

Premium allocation approach

Premium Allocation Approach ("PAA") is a simplified approach applied by the Group approach for certain insurance contracts and reinsurance contracts that are not more than 1 year period of contracts.

The measurement of the liability for incurred claims is identical under all three measurement models, apart from the determination of locked-in interest rates used for discounting.

vi. Onerous contract

Contracts are recognised as onerous if they are expected to be loss making at inception. Those contracts are grouped separately and expected losses are recognised in the consolidated statement of profit or loss.

Based on Management's accounting policy and initial assessment, there are facts and circumstances which indicate that a group of insurance contracts has become onerous.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

vi. Kontrak yang merugi (lanjutan)

Kelompok kontrak asuransi GMM atau VFA dengan *Contractual Service Margin* ("CSM") pada pengakuan awal dapat menjadi merugi ketika peningkatan dalam arus kas pemenuhan yang tidak bervariasi dengan *item* dasar menyebabkan penurunan bagian pemegang saham atas *item* dasar yang melebihi jumlah tercatat CSM. Kelebihan tersebut membentuk kerugian yang diakui secara langsung, dan *Liability for Remaining Coverage ("*LRC") kemudian dibagi menjadi komponen kerugian dan LRC tanpa komponen kerugian.

Untuk kontrak yang diukur menggunakan model PAA, entitas secara berkala memperbarui estimasi atas arus kas masa depan yang terkait dengan klaim yang terjadi, manfaat, dan beban terkait. Jika arus kas pemenuhan yang direvisi melebihi jumlah tercatat dari LRC, hal ini menunjukkan bahwa kelompok kontrak tersebut telah menjadi merugi. Penilaian ini dilakukan pada setiap tanggal pelaporan.

vii. Pengakuan dan penghentian pengakuan kontrak

Grup mengakui sekelompok kontrak asuransi sejak tanggal paling awal dari:

(i) awal periode pertanggungan dari kelompok kontrak;
(ii) tanggal saat pembayaran pertama dari pemegang polis dalam kelompok tersebut jatuh tempo, atau saat pembayaran pertama diterima jika tidak ada tanggal jatuh tempo; dan
(iii) saat kelompok kontrak menjadi merugi.

Grup menghentikan pengakuan kontrak asuransi ketika hak dan kewajiban terkait kontrak tersebut berakhir (yaitu, dilunasi, dibatalkan, atau kadaluarsa), atau ketika kontrak dimodifikasi sedemikian rupa sehingga mengakibatkan perubahan dalam model pengukuran, atau standar yang berlaku untuk mengukur komponen dari kontrak tersebut.

Dalam hal terjadi modifikasi, Grup menghentikan pengakuan kontrak awal dan mengakui kontrak yang telah dimodifikasi sebagai kontrak baru.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contracts** (continued)*

***vi. Onerous contract** (continued)*

Groups of GMM or VFA insurance contracts with a Contractual Service Margin ("CSM") at initial recognition can subsequently become onerous when increases in fulfillment cash flows that do not vary with underlying items declines shareholder's share underlying items exceed carrying amount of CSM. The excess establishes a loss which is recognised immediately and Liability for Remaining Coverage ("LRC") then divided into loss component and LRC excluding loss component.

For contracts measured under PAA, the entity regularly updates its estimates of future cash flows related to incurred claims, benefits, and associated expenses. If the revised fulfilment cash flows exceed the carrying amount of the LRC, it indicates that the group of contracts has become onerous. This assessment is performed at each reporting date.

vii. Recognition and derecognition of contracts

The Group recognises a group of insurance contracts from the earliest date of:
(i) the beginning of the coverage period of the group of contracts;
(ii) the date when the first payment from a policyholder in the group is due or when the first payment is received if there is no due date; and

(iii) when the group of contracts becomes onerous.

The Group derecognises insurance contracts when the rights and obligations relating to the contract are extinguished (i.e., discharged, cancelled; or expired) or the contract is modified such that the modification results in a change in the measurement model, or the applicable standard for measuring a component of the contract.

In the case of modification, the Group derecognises the initial contract and recognises the modified contract as a new contract.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

vii. Pengakuan dan penghentian pengakuan kontrak (lanjutan)

Untuk kontrak reasuransi milikan, Grup mengakui kelompok kontrak reasuransi dari tanggal paling awal berikut:

(i) awal periode pertanggungan dari kelompok kontrak reasuransi milikan. Namun, Grup menunda pengakuan kelompok kontrak reasuransi yang memberikan pertanggungan proporsional hingga tanggal saat kontrak asuransi yang mendasarinya diakui pertama kali, jika tanggal tersebut terjadi setelah awal periode pertanggungan kelompok kontrak reasuransi milikan; dan

(ii) tanggal saat Grup mengakui kelompok kontrak asuransi yang merugi, jika Grup telah mengadakan kontrak reasuransi terkait dalam kelompok kontrak reasuransi milikan pada atau sebelum tanggal tersebut.

Modifikasi dan penghentian pengakuan kontrak reasuransi milikan mengikuti prinsip yang sama seperti kontrak asuransi. Jika terdapat perubahan substansial atau adendum terhadap perjanjian asli, maka kontrak yang ada dihentikan pengakuannya dan kontrak baru diakui.

viii. Tingkat diskonto

Perubahan tingkat diskonto harus mempertimbangkan waktu, mata uang, dan karakteristik likuiditas dari arus kas dalam kontrak asuransi, yang mungkin berbeda dari aset yang mendukung liabilitas tersebut.

Grup akan menggunakan pendekatan *bottom-up* untuk memperoleh tingkat diskonto arus kas.

Berdasarkan pendekatan ini, tingkat diskonto ditentukan sebagai *risk-free yield* disesuaikan dengan perbedaan karakteristik likuiditas antara aset keuangan yang digunakan untuk memperoleh *risk-free yield* dan arus kas liabilitas yang relevan (dikenal sebagai *illiquidity premiu*m).

2. MATERIAL ACCOUNTING POLICY INFORMATION *(continued)*

y. Insurance contracts *(continued)*

vii. Recognition and derecognition of contracts *(continued)*

For reinsurance contract held, the Group recognises a group of reinsurance contracts held from the earliest date of:

(i) the beginning of the coverage period of the group of reinsurance contracts held. However, the Group delays the recognition of a group of reinsurance contracts held that provide proportionate coverage until the date when any underlying insurance contract is initially recognised, if that date is later than the beginning of the coverage period of the group of reinsurance contracts held; and

(ii) the date the Group recognises an onerous group of underlying insurance contracts if the Group entered into the related reinsurance contract held in the group of reinsurance contracts held at or before that date.

Modification and derecognition of reinsurance contracts held follow the same principles as insurance contracts. If a substantial change or addendum is made to the original agreement, the existing contract is derecognised and a new one is recognised.

viii. Discount rate

The change of discount rate must consider the timing, currency, and liquidity characteristics of the cash flows in insurance contracts, which may be different from the assets supporting those liabilities.

The Group will use the bottom-up approach to derive the discount rate for the cash flows.

Under this approach, the discount rate is determined as the risk-free yield adjusted for differences in liquidity characteristics between the financial assets used to derive the risk-free yield and the relevant liability cash flows (known as an illiquidity premium).

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

ix. Penyajian dan pengungkapan

Grup menyajikan secara terpisah hasil layanan asuransi, yang terdiri dari pendapatan asuransi dan beban layanan asuransi, dari hasil investasi, yang terdiri dari pendapatan atau beban keuangan asuransi dalam laporan laba rugi konsolidasian.

x. Pendapatan jasa asuransi - kontrak asuransi yang diukur dengan GMM dan VFA

CSM mencerminkan laba yang belum direalisasi dan tidak menghasilkan pendapatan maupun beban pada saat pengakuan awal ketika kelompok kontrak tersebut menguntungkan. CSM disesuaikan pada setiap periode pelaporan berikutnya untuk perubahan arus kas pemenuhan yang terkait dengan jasa di masa depan (misalnya perubahan asumsi non-ekonomi, termasuk tingkat mortalitas dan morbiditas). Untuk pengakuan awal kelompok kontrak yang merugi dan ketika kelompok kontrak menjadi merugi setelahnya, kerugian diakui segera sebagai beban jasa asuransi.

CSM akan diakui secara sistematis sebagai pendapatan atas layanan yang telah diberikan selama periode cakupan yang diharapkan dari suatu kelompok kontrak, tanpa mempengaruhi laba dari keseluruhan kontrak. Sedangkan, total estimasi kerugian yang mungkin timbul dari kontrak yang memberatkan diakui di awal. CSM disesuaikan tergantung pada model pengukuran kelompok kontrak asuransi.

Pendapatan asuransi mencerminkan imbalan yang diharapkan Grup untuk diperoleh sebagai pertukaran atas pemberian pertanggungan dan layanan kontrak asuransi lainnya (tidak termasuk komponen investasi). Beban jasa asuransi terdiri dari klaim yang terjadi dan beban jasa asuransi lainnya yang terjadi (tidak termasuk komponen investasi), serta kerugian atas kelompok kontrak yang merugi dan pembalikan atas kerugian tersebut.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contracts** (continued)*

ix. Presentation and disclosure

The Group separately presents the insurance service result, which comprises insurance revenue and insurance service expenses, from the investment result, which comprises insurance finance income or expenses in the consolidated statement of profit or loss.

x. Insurance service revenue - insurance contracts measured under GMM and VFA

The CSM represents the unearned profit and results in no income or expense at initial recognition when the group of contracts is profitable. The CSM is adjusted at each subsequent reporting period for changes in fulfilment of cash flows relating to future service (e.g. changes in noneconomic assumptions, including mortality and morbidity rates). For initial recognition of onerous groups of contracts and when groups of contracts become onerous subsequently, losses are recognised in insurance service expense immediately.

CSM is recognised systematically as revenue for services provided over the expected coverage period of a group of contracts, without affecting the overall profit of the contract. In contrast, the total estimated losses that may arise from onerous contracts are recognised at inception. The CSM is adjusted depending on the measurement model applied to the group of insurance contracts.

Insurance revenue reflects the consideration to which the Group expects to be entitled in exchange for the provision of coverage and other insurance contract services (excluding any investment components). Insurance service expenses comprise the incurred claims and other incurred insurance service expenses (excluding any investment components), and losses on onerous groups of contracts and reversals of such losses.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Kontrak asuransi (lanjutan)

xi. Beban jasa asuransi

Beban jasa asuransi yang timbul dari kontrak asuransi diakui dalam laba rugi secara umum pada saat terjadi. Beban ini mengecualikan pengembalian komponen investasi dan terutama terdiri dari hal-hal berikut:

- klaim yang terjadi dan beban jasa asuransi lainnya;
- amortisasi arus kas akuisisi asuransi;
- kerugian atas kontrak yang merugikan dan pembalikan atas kerugian tersebut; dan
- penyesuaian terhadap liabilitas atas klaim yang terjadi yang tidak timbul dari pengaruh nilai waktu uang, risiko keuangan, dan perubahan terkait.

xii. Pendapatan/beban keuangan asuransi

Pendapatan atau beban keuangan asuransi mencakup perubahan dalam jumlah tercatat kelompok kontrak asuransi dan kontrak reasuransi yang dimiliki yang timbul dari pengaruh nilai waktu uang, risiko keuangan, dan perubahannya. Termasuk di dalamnya perubahan pengukuran kelompok kontrak yang disebabkan oleh perubahan nilai *item* yang mendasarinya (tidak termasuk penambahan dan penarikan).

Grup memilih untuk menerapkan kebijakan akuntansi pada paragraf 88.b PSAK 117 untuk kontrak asuransi yang diukur menggunkanan GMM untuk memisahkan penghasilan atau beban keuangan asuransi untuk periode berjalan dengan memasukkan ke dalam laba rugi sejumlah yang ditentukan oleh alokasi sistematis dari ekspektasi total penghasilan atau beban keuangan asuransi sepanjang jangka waktu kelompok kontrak.

z. Perpajakan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang diakui di penghasilan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam penghasilan komprehensif lain atau ekuitas.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***y. Insurance contracts** (continued)*

xi. Insurance service expense

Insurance service expenses arising from insurance contracts are recognised in profit or loss generally as they are incurred. They exclude repayments of investment components and mainly comprise the following items:

- *incurred claims and other insurance service expenses;*
- *amortisation of insurance acquisition cash flows;*
- *losses on onerous contracts and reversals of such losses; and*
- *adjustments to the liabilities for incurred claims that do not arise from the effects of the time value of money, financial risk and changes therein.*

xii. Insurance finance income/expenses

Insurance finance income or expenses comprise changes in the carrying amounts of groups of insurance contracts and reinsurance contracts held arising from the effects of the time value of money, financial risk and changes therein. This includes changes in the measurement of groups of contracts caused by changes in the value of underlying items (excluding additions and withdrawals).

The Group chooses to apply the accounting policy in paragraph 88.b of PSAK 117 for insurance contracts measured using the GMM to separate insurance finance income or expenses for the current period by including in profit or loss an amount determined by the systematic allocation of the total expected insurance finance income or expenses over the coverage period of the group of contracts.

z. Taxation

The tax expense comprises of current and deferred tax. Tax are recognised in the profit or loss, except to the extent that it relates to items recognised in other comprehensive income or directly in equity. In this case, the tax is also recognised in other comprehensive income or directly in equity, respectively.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

z. Perpajakan (lanjutan)

Beban pajak kini dihitung berdasarkan peraturan perpajakan yang berlaku pada tanggal pelaporan keuangan. Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan (SPT) sehubungan dengan situasi dimana aturan pajak yang berlaku membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

Pajak penghasilan tangguhan diakui, dengan menggunakan metode posisi keuangan untuk semua perbedaan temporer antara dasar pengenaan pajak aset dan liabilitas dengan nilai tercatatnya pada laporan keuangan konsolidasian. Namun, liabilitas pajak penghasilan tangguhan tidak diakui jika berasal dari pengakuan awal *goodwill* atau pada saat pengakuan awal aset dan liabilitas yang timbul dari transaksi selain kombinasi bisnis yang pada saat transaksi tersebut tidak memengaruhi laba rugi akuntansi dan laba rugi kena pajak. Pajak penghasilan tangguhan ditentukan dengan menggunakan tarif pajak yang telah berlaku atau secara substantif telah berlaku pada akhir periode pelaporan dan diharapkan diterapkan ketika aset pajak penghasilan tangguhan direalisasi atau liabilitas pajak penghasilan tangguhan diselesaikan.

Aset pajak penghasilan tangguhan diakui hanya jika besar kemungkinan jumlah penghasilan kena pajak dimasa depan akan memadai untuk dikompensasi dengan perbedaan temporer yang masih dapat dimanfaatkan.

Aset dan liabilitas pajak penghasilan tangguhan dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus antara aset pajak kini dengan liabilitas pajak kini dan apabila aset dan liabilitas pajak penghasilan tangguhan dikenakan oleh otoritas perpajakan yang sama, baik atas entitas kena pajak yang sama ataupun berbeda dan adanya niat untuk melakukan penyelesaian saldo-saldo tersebut secara neto.

Koreksi terhadap kewajiban perpajakan diakui saat surat ketetapan pajak diterima atau jika mengajukan keberatan, pada saat keputusan atas keberatan tersebut telah ditetapkan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***z. Taxation** (continued)*

The current income tax charge is calculated on the basis of the tax laws enacted or substantively enacted at the reporting date. Management periodically evaluates positions taken in tax returns with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provision where appropriate on the basis of amounts expected to be paid to the tax authorities.

Deferred income tax is recognised, using the financial position method, on temporary differences arising between the tax bases of assets and liabilities and their carrying amounts in the consolidated financial statements. However, deferred tax liabilities are not recognised if they arise from the initial recognition of goodwill and deferred income tax is not accounted for if it arises from initial recognition of an asset or liability in a transaction other than a business combination that at the time of the transaction affects neither accounting nor taxable profit or loss. Deferred income tax is determined using tax rates that have been enacted or substantially enacted as at reporting period and is expected to apply when the related deferred income tax asset is realised or the deferred income tax liability is settled.

Deferred tax assets are recognised only to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised.

Deferred tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when the deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority either the same taxable entity or different taxable entities where there is an intention to settle the balances on a net basis.

Corrections to taxation obligations are recorded when an assessment is received or, if appealed against, when the appeal has been decided.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

aa. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

Imbalan pensiun dan imbalan pascakerja lainnya

BNI memiliki program pensiun imbalan pasti dan iuran pasti.

Program pensiun imbalan pasti adalah program pensiun yang menetapkan jumlah imbalan pensiun yang akan diterima oleh karyawan pada saat pensiun, yang biasanya tergantung pada satu faktor atau lebih, seperti umur, masa kerja, dan jumlah kompensasi. Program ini dikelola oleh Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun").

Program pensiun iuran pasti adalah program pensiun dimana Bank akan membayar iuran tetap kepada sebuah entitas yang terpisah (dana pensiun) dan tidak memiliki liabilitas hukum atau konstruktif untuk membayar kontribusi lebih lanjut. Program ini dikelola oleh Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk ("DPLK").

BNI diharuskan menyediakan imbalan pensiun minimum yang diatur dalam Undang-Undang Cipta Kerja No. 6/2023 dan PP 35/2021, yang merupakan liabilitas imbalan pasti. Jika imbalan pensiun sesuai dengan Undang-Undang Cipta Kerja No. 6/2023 dan PP 35/2021 lebih besar, selisih tersebut diakui sebagai bagian dari liabilitas imbalan pensiun.

Karena Undang-Undang Cipta Kerja menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, pada dasarnya program pensiun berdasarkan Undang-Undang Cipta Kerja adalah program imbalan pasti.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

aa. Employee benefits

Short-term employee benefits

Short-term employee benefits are recognised when they accrued to the employees.

Pension benefits and other post-employment

BNI has defined benefit and defined contribution pension plans.

A defined benefit pension plan is a pension plan that defines an amount of pension that will be received by the employee on becoming entitled to a pension, which usually depends on one or more factors such as age, years of service and compensation. This plan is managed by Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun").

A defined contribution plan is a pension plan under which the Bank pays fixed contributions into a separate entity (pension fund) and has no legal or constructive obligation to pay further contributions. This plan is managed by Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk ("DPLK").

BNI is required to provide minimum pension benefits as stipulated in Undang-Undang Cipta Kerja No. 6/2023 and PP 35/2021 which represents an underlying defined benefit obligation. If the pension benefits based on Undang-Undang Cipta Kerja No. 6/2023 and PP 35/2021 are higher, the difference is recorded as part of the overall pension benefits obligation.

Since the Undang-Undang Cipta Kerja sets the formula for determining the minimum amount of benefits, in substance pension plans under the Undang-Undang Cipta Kerja represent defined benefit plans.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

aa. Imbalan kerja (lanjutan)

Imbalan pensiun dan imbalan pascakerja lainnya (lanjutan)

Sehubungan dengan program imbalan pasti, liabilitas diakui pada laporan posisi keuangan konsolidasian sebesar nilai kini kewajiban imbalan pasti pada akhir periode pelaporan dikurangi nilai wajar aset program. Kewajiban imbalan pasti dihitung setiap tahun oleh aktuaris yang independen dengan menggunakan metode *projected unit credit*.

Nilai kini kewajiban imbalan pasti ditentukan dengan mendiskontokan arus kas keluar yang diestimasi dengan menggunakan tingkat bunga Obligasi Pemerintah (dikarenakan saat ini tidak ada pasar aktif untuk obligasi perusahaan yang berkualitas tinggi) yang didenominasikan dalam Rupiah dimana imbalan akan dibayarkan dan memiliki jangka waktu jatuh tempo mendekati jangka waktu kewajiban pensiun.

Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial langsung diakui seluruhnya melalui penghasilan komprehensif lainnya pada saat terjadinya.

Biaya jasa lalu diakui segera dalam laporan laba rugi.

Keuntungan dan kerugian dari kurtailmen atau penyelesaian program manfaat pasti diakui di laba rugi ketika kurtailmen atau penyelesaian tersebut terjadi.

Grup juga memberikan imbalan pasca kerja lainnya, seperti uang penghargaan dan uang pisah. Imbalan berupa uang penghargaan diberikan apabila karyawan bekerja hingga mencapai usia pensiun. Sedangkan imbalan berupa uang pisah, dibayarkan kepada karyawan yang mengundurkan diri secara sukarela, setelah memenuhi minimal masa kerja tertentu. Imbalan ini dihitung dengan menggunakan metodologi yang sama dengan metodologi yang digunakan dalam perhitungan program pensiun imbalan pasti.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***aa. Employee benefits** (continued)*

***Pension benefits and other post-employment benefits** (continued)*

The liability recognised in the consolidated statement of financial position in respect of defined benefit pension plans is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method.

The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of Government Bonds (considering that currently there is no active market for high-quality corporate bonds) that are denominated in Rupiah in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions are charged or credited to equity in other comprehensive income in the period in which they arise.

Past-service costs are recognised immediately in profit or loss.

Gains or losses on the curtailment or settlement of a defined benefit plan are recognised in profit or loss when the curtailment or settlement occurs.

The Group also provides other post-employment benefits, such as service pay and separation pay. The service pay benefit vests when the employees reach their retirement age. The separation pay benefit is paid to employees in the case of voluntary resignation, subject to a minimum number of years of service. These benefits have been accounted for using the same methodology as for the defined benefit pension plan.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

aa. Imbalan kerja (lanjutan)

Imbalan jangka panjang lainnya

Imbalan jangka panjang lainnya seperti cuti berimbalan jangka panjang, imbalan cacat permanen dan penghargaan *jubilee* dihitung dengan menggunakan metode *projected unit credit* dan didiskontokan ke nilai kini. Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial diakui dalam laporan laba rugi.

ab. Laba per saham dasar

Laba bersih per saham dasar dihitung dengan membagi laba bersih yang tersedia bagi pemilik entitas induk dengan jumlah rata-rata tertimbang saham biasa yang beredar selama periode yang bersangkutan.

ac. Transaksi dengan pihak-pihak berelasi

BNI dan Entitas Anak melakukan transaksi dengan pihak-pihak berelasi seperti yang didefinisikan dalam PSAK 224 tentang "Pengungkapan Pihak-pihak Berelasi" dan Peraturan No. KEP-347/BL/2012 tanggal 25 Juni 2012 tentang "Pedoman Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik" yang didefinisikan antara lain:

(i) perusahaan di bawah pengendalian BNI dan Entitas Anak;
(ii) perusahaan asosiasi;
(iii) investor yang memiliki hak suara, yang memberikan investor tersebut suatu pengaruh yang signifikan;
(iv) perusahaan di bawah pengendalian investor yang dijelaskan dalam Catatan iii di atas;
(v) karyawan kunci dan anggota keluarganya; dan
(vi) entitas yang dikendalikan, dikendalikan bersama atau dipengaruhi secara signifikan oleh Pemerintah yaitu Menteri Keuangan yang merupakan pemegang saham dari entitas.

Semua transaksi signifikan dengan pihak-pihak berelasi, telah diungkapkan pada catatan atas laporan keuangan konsolidasian.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

***aa. Employee benefits** (continued)*

Other long-term benefits

Other long-term employee benefits such as long service leave, permanent disability benefit and jubilee awards are calculated using the projected unit credit method and discounted to present value. Actuarial gains and losses arising from experience adjustments and change in actuarial assumption are recognised and credited to profit or loss.

ab. Basic earnings per share

Basic earnings per share are computed by dividing the profit attributable to the equity holders of the parent entity by the weighted average number of ordinary shares outstanding during the period.

ac. Transactions with related parties

BNI and Subsidiaries enter into transactions with parties which are defined as related parties in accordance with SFAS 224 regarding "Related Party Disclosures" and Regulation No. KEP-347/BL/2012 dated 25 June 2012 regarding "Guidelines for Financial Statements Presentation and Disclosure of Issuers or Public Companies", which are defined, among others, as:

(i) entities under the control of BNI and Subsidiaries;
(ii) associated companies;
(iii) investors with voting rights that gives them significant influence;
(iv) entities controlled by investors under Note iii above;
(v) key employees and family members; and
(vi) entity that is controlled, jointly controlled or significantly influenced by Government, which is defined as the Minister of Finance who has share ownership in the entity.

All significant transactions with related parties have been disclosed in notes to the consolidated financial statements.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ad. Dividen

Pembagian dividen kepada para pemegang saham diakui sebagai liabilitas dalam laporan keuangan konsolidasian pada periode ketika dividen tersebut disetujui oleh para pemegang saham.

ae. Pelaporan segmen

Grup mengidentifikasikan segmen operasi sebagai suatu komponen dari entitas:

a) yang terlibat dalam aktivitas bisnis yang mana memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban terkait dengan transaksi dengan komponen lain dari entitas yang sama);
b) hasil operasinya dikaji ulang secara reguler oleh pengambil keputusan operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
c) tersedia informasi keuangan yang dapat dipisahkan.

Sesuai dengan PSAK 108 tentang "Segmen Operasi", Grup menyajikan segmen operasi berdasarkan laporan internal Grup yang disajikan kepada pengambil keputusan operasional. Pengambil keputusan operasional adalah Direksi.

Pada tahun 2025 berdasarkan SK Penataan Organisasi Direksi tanggal 1 Agustus 2025, Grup mengungkapkan segmen operasionalnya berdasarkan segmen usaha sebagai berikut: *Corporate Banking, Institutional Banking, Commercial Banking, Consumer Banking, Treasury & International Banking*, Kantor Pusat dan Entitas Anak sesuai dengan organisasi dan pembidangan direksi.

af. Biaya emisi penerbitan saham

Biaya-biaya emisi efek yang terjadi sehubungan dengan penawaran saham kepada masyarakat (termasuk penerbitan hak memesan efek terlebih dahulu) dikurangkan langsung dari hasil emisi dan disajikan sebagai pengurang pada akun "Tambahan Modal Disetor - Bersih", sebagai bagian dari Ekuitas pada laporan posisi keuangan konsolidasian.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

ad. Dividends

Dividend distribution to the shareholders is recognised as a liability in the consolidated financial statements in the period in which the dividends are approved by the shareholders.

ae. Segment reporting

The Group defines an operating segment as a component of an entity:

a) that engages in business activities from which it may earn revenues and incur expenses (including revenues and expenses relating to transactions with other components of the same entity);

b) whose operating results are reviewed regularly by the entity's chief operating decision maker to make decisions about resources to be allocated to the segment and assess its performance; and

c) for which discrete financial information is available.

Refer to SFAS 108 about "Operating Segments", the Group discloses its operating segments based on Group's internal report presented to operation-decision makers. The operation-decision makers are the Board of Directors.

In 2025, based on the Decree regarding organizational arrangements on August 1st 2025, the Group disclosing its operational segments based on business segments as follows: Corporate Banking, Institutional Banking, Commercial Banking, Consumer Banking, Treasury & International Banking, Head Office and Subsidiaries with each business segments referring to organizational of board of directors.

af. Shares issuance costs

Costs related to the public offering of shares (including pre-emptive rights issue) are deducted from the proceeds and presented as a deduction of "Additional Paid-In Capital - Net" account, under Equity section in the consolidated statement of financial position.

2. INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ag. Saham treasuri

Ketika entitas Grup membeli modal saham ekuitas entitas (saham treasuri), imbalan yang dibayar, termasuk biaya tambahan yang secara langsung dapat diatribusikan (dikurangi pajak penghasilan) dikurangkan dari ekuitas yang diatribusikan kepada pemilik ekuitas entitas sampai saham tersebut dibatalkan atau diterbitkan kembali. Ketika saham biasa tersebut selanjutnya diterbitkan kembali, imbalan yang diterima, dikurangi biaya tambahan transaksi yang terkait dan dampak pajak penghasilan yang terkait dimasukkan kepada ekuitas yang dapat diatribusikan kepada pemilik ekuitas entitas.

ah. Kompensasi berbasis saham

Bank menjalankan program kompensasi berbasis saham dengan penyelesaian menggunakan ekuitas. Nilai wajar dari jasa karyawan yang dikompensasikan dengan saham Bank diakui sebagai beban di laporan laba rugi. Jumlah keseluruhan yang diakui sepanjang periode *vesting* ditentukan berdasarkan nilai wajar saham yang diberikan pada tanggal pemberian kompensasi.

ai. Tanggung Jawab Sosial dan Lingkungan

Berdasarkan PER-05/MBU/04/2021 tentang Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara tanggal 20 April 2021 sebagaimana diubah terakhir dengan PER1/MBU/03/2023 tentang Penugasan Khusus dan Program Tanggung Jawab Sosial dan Lingkungan Badan Usaha Milik Negara tanggal 24 Maret 2023, istilah PKBL (Program Kemitraan dan Bina Lingkungan) tidak digunakan lagi dan diganti menjadi TJSL (Tanggung Jawab Sosial & Lingkungan). Alokasi dana tidak dialokasikan dari saldo laba berdasarkan hasil keputusan Rapat Umum Pemegang Saham (RUPS) akan tetapi diakui dan dibebankan ke laporan laba rugi dan penghasilan komprehensif lain konsolidasian tahun berjalan.

***2. MATERIAL ACCOUNTING POLICY INFORMATION** (continued)*

ag. Treasury shares

When any Group entity purchases the entity's equity share capital (treasury shares), the consideration paid, including any directly attributable incremental costs (net of income taxes) is deducted from equity attributable to the entity's equity holders until the shares are cancelled or reissued. When ordinary shares are subsequently reissued, any consideration received, net of any directly attributable incremental transaction costs and the related income tax effects, is included in equity attributable to the entity's equity holders.

ah. Share-based payment

Bank operates an equity-settled, share-based compensation plan. The fair value of the employee services received in exchange for the grant of shares is recognised as an expense in the statements of profit or loss. The total amount to be recognised over the vesting period is determined based on the fair value of the shares granted on the grant date.

ai. Social and Environmental Responsibility

Based on PER-05/MBU/04/2021 concerning Social and Environmental Responsibility Programs for State-Owned Enterprises dated 20 April 2021, as last amended by PER 1/MBU/03/2023 concerning Special Assignments and Social and Environmental Responsibility Programs for Owned Enterprises, 24 March 2023, the term PKBL (Partnership and Community Development Program) is no longer used and replaced with TJSL (Social and Environmental Responsibility). Allocation of funds is not made from retained earnings based on resolutions of the General Meeting of Shareholders (GMS), but is recognised and charged to the consolidated statement of profit or loss and other comprehensive income for the current year.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING

Beberapa estimasi dan asumsi dibuat dalam rangka penyusunan laporan keuangan konsolidasian dimana dibutuhkan pertimbangan manajemen dalam menentukan metodologi yang tepat untuk penilaian aset dan liabilitas.

Manajemen membuat estimasi dan asumsi yang berimplikasi pada pelaporan nilai aset dan liabilitas atas tahun keuangan satu tahun ke depan. Semua estimasi dan asumsi yang diharuskan oleh PSAK adalah estimasi terbaik yang didasarkan pada standar yang berlaku. Estimasi dan pertimbangan dievaluasi secara terus menerus dan berdasarkan pengalaman masa lalu dan faktor-faktor lain termasuk harapan atas kejadian yang akan datang.

Walaupun estimasi dan asumsi ini dibuat berdasarkan pengetahuan terbaik manajemen atas kejadian dan tindakan saat ini, hasil yang timbul mungkin berbeda dengan estimasi dan asumsi semula.

Sumber utama ketidakpastian estimasi dan pertimbangan:

a. Cadangan kerugian penurunan nilai aset keuangan

Kondisi spesifik *counterparty* yang mengalami penurunan nilai dalam pembentukan cadangan kerugian atas aset keuangan dievaluasi secara individu berdasarkan estimasi terbaik manajemen atas nilai kini arus kas yang diharapkan akan diterima, baik dari waktu dan jumlah. Dalam mengestimasi arus kas tersebut, manajemen membuat pertimbangan tentang situasi keuangan *counterparty* dan nilai realisasi bersih dari setiap agunan, serta probabilitas rata-rata tertimbang kerugian kredit. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan manfaat yang ada, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS

Certain estimates and assumptions are made in the preparation of the consolidated financial statements and these require management judgement in determining the appropriate methodology for valuation of assets and liabilities.

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. All estimates and assumptions required in conformity with SFAS are best estimates undertaken in accordance with the applicable standard. Estimates and judgements are evaluated on a continuous basis, and are based on past experiences and other factors, including expectations with regard to future events.

Although these estimates and assumptions are based on management's best knowledge of current events and activities, actual result may differ from those estimates and assumptions.

Key sources of estimation uncertainty and judgements:

a. Allowances for impairment losses of financial assets

In the calculation of allowance for impairment losses of financial assets, the specific condition of impaired counterparty is individually evaluated based on management's best estimate of the present value of the expected cash flows to be received, including both timing and amount. In estimating these cash flows, management makes judgements about the counterparty's financial situation and the net realizable value of any underlying collateral, including weighted average probability of credit losses. Each impaired asset is assessed on its merits, and the workout strategy and estimated cash flows considered recoverable.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi dan pertimbangan: (lanjutan)

a. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Perhitungan cadangan penurunan nilai kolektif meliputi kerugian kredit yang melekat dalam portofolio aset keuangan dengan karakteristik ekonomi yang sama, tetapi penurunan nilai secara individu belum dapat diidentifikasi. Dalam menilai kebutuhan untuk cadangan kolektif, manajemen mempertimbangkan faktor-faktor seperti kualitas kredit dan jenis produk. Guna membuat estimasi cadangan yang diperlukan, manajemen membuat asumsi untuk menentukan kerugian yang melekat, termasuk probabilitas rata-rata tertimbang kerugian kredit, *loss given default* dan *exposure of default,* dan untuk menentukan parameter *input* yang diperlukan, berdasarkan pengalaman masa lalu, kondisi ekonomi saat ini dan perkiraan kondisi ekonomi dimasa depan. Keakuratan penyisihan tergantung pada seberapa baik estimasi arus kas masa depan untuk cadangan *counterparty* tertentu dan asumsi model dan parameter yang digunakan dalam menentukan cadangan kolektif.

Berdasarkan pertimbangan manajemen, Grup dapat membentuk penyisihan tambahan ketika perhitungan cadangan yang dihasilkan oleh model yang digunakan tidak menghasilkan angka kerugian kredit ekspektasian yang mencukupi. Dari waktu ke waktu Grup akan meninjau kembali penyisihan tambahan tersebut atau melakukan penyesuaian pada perhitungan kerugian kredit ekspektasian yang digunakan.

b. Menentukan nilai wajar instrumen keuangan

Dalam menentukan nilai wajar aset keuangan dan liabilitas yang tidak mempunyai harga pasar, Grup menggunakan teknik penilaian seperti yang dijelaskan dalam Catatan 2c. Untuk instrumen keuangan yang jarang diperdagangkan dan memiliki informasi harga yang terbatas, nilai wajar menjadi kurang objektif dan membutuhkan berbagai tingkat penilaian tergantung pada likuiditas, konsentrasi, faktor ketidakpastian pasar, asumsi harga dan risiko lainnya.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS *(continued)*

Key sources of estimation uncertainty and judgements: (continued)

a. Allowances for impairment losses of financial assets *(continued)*

Collectively assessed impairment allowances cover credit losses inherent in portfolios of financial assets with similar economic characteristics, but the individually impaired items cannot yet be identified. In assessing the need for collective allowances, management considers factors such as credit quality and type of product. In order to estimate the required allowance, assumptions are made to define the way inherent losses are modelled, which include weighted average probability of default, loss given default and exposure at default, and to determine the required input parameters, based on historical experiences, current economic conditions and forecast on future economic condition. The accuracy of the allowances depends on how well these estimated future cash flows for specific counterparty allowances and the model assumptions and parameters are used in determining collective allowances.

Based on management's judgment, the Group may establish additional allowances when the reserve calculation produced by the model in use does not result in a sufficient amount of expected credit losses. From time to time, the Group will review such additional allowances or adjust the expected credit loss calculations applied.

b. Determining fair values of financial instruments

In determining the fair value for financial assets and financial liabilities for which there is no observable market price, the Group uses the valuation techniques as described in Note 2c. For financial instruments that are traded infrequently and there is a lack of price transparency, fair value is less objective and requires varying degrees of judgement depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi dan pertimbangan: (lanjutan)

b. Menentukan nilai wajar instrumen keuangan (lanjutan)

Masukan (*input*) untuk model ini berasal dari data pasar yang bisa diamati. Bila data pasar yang bisa diamati tersebut tidak tersedia, manajemen mempertimbangkan masukan dan asumsi diperlukan untuk menentukan nilai wajar. Pertimbangan tersebut mencakup *feedback* model atas likuiditas volatilitas untuk transaksi derivatif dan tingkat diskonto yang berjangka waktu panjang, tingkat pelunasan dipercepat dan asumsi tingkat gagal bayar.

c. Imbalan kerja karyawan

Nilai kini atas imbalan kerja karyawan tergantung dari banyaknya faktor yang dipertimbangkan oleh aktuaris berdasarkan beberapa asumsi. Perubahan atas asumsi-asumsi tersebut akan memengaruhi *carrying amount* atas imbalan kerja karyawan.

Asumsi yang digunakan dalam menentukan biaya atau pendapatan bersih untuk imbalan kerja termasuk tingkat diskonto. Grup menentukan tingkat diskonto yang tepat pada setiap periode pelaporan. Ini merupakan tingkat suku bunga yang digunakan untuk menentukan nilai kini atas arus kas masa depan yang diestimasi akan digunakan untuk membayar imbalan kerja. Dalam menentukan tingkat diskonto yang tepat, Grup mempertimbangkan tingkat suku bunga atas Obligasi Pemerintah yang mempunyai jatuh tempo yang menyerupai jangka waktu imbalan kerja karyawan.

Asumsi kunci liabilitas pensiun lainnya sebagian ditentukan berdasarkan kondisi pasar saat ini.

d. Penilaian dari liabilitas kontrak asuransi

Arus kas pemenuhan

Arus kas pemenuhan kontrak asuransi mewakili nilai kini dari estimasi arus kas keluar masa depan, dikurangi nilai kini dari estimasi arus kas masuk masa depan, dan disesuaikan dengan provisi untuk penyesuaian risiko terhadap risiko non-keuangan.

Saat memperkirakan arus kas masa depan, Grup mempertimbangkan ekspektasi terkini tentang peristiwa masa depan yang mungkin memengaruhi seluruh arus kas dalam batas kontrak, seperti penerimaan premi, pembayaran kepada pemegang polis, arus kas akuisisi asuransi, dan biaya lain yang terjadi.

3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS *(continued)*

Key sources of estimation uncertainty and judgements: (continued)

b. Determining fair values of financial instruments *(continued)*

The input for this model comes from observable market data. When observable market data are not available, management considers necessary inputs and assumptions to determine the fair value. The above considerations include liquidity and volatility feedback model for derivative transactions and long term discount rate, the level of early payment and the level of default assumption.

c. Employee benefit

The present value of the employee benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions. Any changes in these assumptions will impact the carrying amount of employee benefit obligations.

The assumptions used in determining the net cost or for employee benefits include the discount rate. The Group determines the appropriate discount rate at the end of each reporting period. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the pension obligations. In determining the appropriate discount rate, the Group considers the interest rates of Government Bonds that have terms to maturity approximating the terms of the related employee benefit liability.

Other key assumptions for pension obligations are partly based on current market conditions.

d. Valuation of insurance contract liabilities

Fulfilment cash flows

Fulfilment cash flows of insurance contracts represents the present value of estimated future cash outflows, less the present value of estimated future cash inflows and adjusted for a provision for the risk adjustment for non-financial risk.

When estimating future cash flows, the Group considers current expectations of future events that may affect all cash flows within the contract boundaries, such as premium received, payments to policyholders, insurance acquisition cash flows, and other incurred expenses.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi dan pertimbangan: (lanjutan)

d. Penilaian dari liabilitas kontrak asuransi (lanjutan)

Arus kas pemenuhan (lanjutan)

Grup menetapkan asumsi mortalitas dan morbiditas dari pengalaman terbaru yang dapat dipercaya. Asumsi pembatalan polis didasarkan pada pengalaman Grup sendiri dan umumnya bervariasi berdasarkan jenis produk serta tahun polis.

Grup mengadopsi pendekatan *bottom-up*, di mana tingkat diskonto didasarkan pada *risk-free yield curve* dan penyesuaian untuk *illiquidity premium*. Untuk *illiquidity premium*, kategori likuiditas rendah diberikan menggunakan sistem penilaian objektif yang didasarkan pada karakteristik likuiditas rendah dari produk di setiap portofolio.

Margin jasa kontraktual

CSM mewakili keuntungan yang belum diterima yang akan diakui Grup seiring dengan pemberian jasa kontrak asuransi di masa depan. Pelepasan CSM untuk suatu kelompok kontrak diakui sebagai pendapatan jasa asuransi dalam laporan laba rugi konsolidasian berdasarkan jumlah unit pertanggungan yang diberikan selama periode tersebut. Unit pertanggungan ditentukan oleh besarnya manfaat yang diberikan dalam suatu kontrak dan durasi perlindungan yang diharapkan. Periode pertanggungan yang diharapkan ditentukan berdasarkan kemungkinan terjadinya peristiwa yang diasuransikan sejauh mereka mempengaruhi durasi yang diharapkan dari kontrak dalam kelompok tersebut. Menentukan periode pertanggungan yang diharapkan memerlukan penilaian karena melibatkan perkiraan tentang kejadian klaim dan pembatalan yang akan terjadi.

e. Transisi dari PSAK 104 ke PSAK 117

Grup menerapkan PSAK 117 untuk periode laporan keuangan konsolidasian yang dimulai pada 1 Januari 2024. Grup telah menentukan bahwa penerapan pendekatan retrospektif penuh tidak praktis untuk beberapa kelompok kontrak karena informasi historis tertentu tidak tersedia atau tidak dapat diperoleh tanpa biaya atau upaya yang berlebihan sehingga memungkinkan penggunaannya dalam pendekatan tersebut.

***3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS** (continued)*

Key sources of estimation uncertainty and judgements: (continued)

***d. Valuation of insurance contract liabilities** (continued)*

Fulfilment cash flows (continued)

The Group derives mortality and morbidity assumptions from recent experience where credible. Lapse assumption is derived based on the Group's own experience and they generally vary by product type as well as policy years.

The Group adopts a bottom-up approach in which dicount rates are based on the risk-free yield curves and an adjustment for illiquidity premium. For illiquidity premium, illiquidity buckets are assigned using an objective scoring system that is based on the illiquidity characteristics of products on each portfolio.

Contractual service margin

CSM represents the unearned profit that the Group will recognise as it provides insurance contract services in the future. The release of the CSM for a group of contracts is recognised as insurance service revenue in the consolidated statement of profit or loss, based on the number of coverage units provided during the period. Coverage units are determined by the quantity of benefits provided under a contract and its expected coverage duration. Expected coverage period is derived based on the likelihood of an insured event occurring to the extent they affect the expected duration of contracts in the group. Determining the expected coverage period is judgemental since it involves making an expectation of when claims and lapse will occur.

e. Transition from SFAS 104 to SFAS 117

The Group applied PSAK 117 for the consolidated financial statement period beginning on 1 January 2024. The Group has determined that it was impracticable to apply the full retrospective approach for some groups of contracts because certain historical information was not available or was not available without undue cost or effort that would enable it to be used under this approach.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi dan pertimbangan: (lanjutan)

e. Transisi dari PSAK 104 ke PSAK 117 (lanjutan)

Oleh karena itu, Grup menerapkan pendekatan nilai wajar untuk kelompok kontrak tersebut. Grup menggunakan pertimbangan dalam menentukan pendekatan transisi, menerapkan metode transisi, dan mengukur dampak transisi pada tanggal transisi, yang akan memengaruhi jumlah yang diakui dalam laporan keuangan konsolidasian pada tanggal transisi.

f. Aset pajak tangguhan

Aset pajak tangguhan diakui atas jumlah pajak penghasilan terpulihkan (*recoverable*) pada periode mendatang sebagai akibat perbedaan temporer yang boleh dikurangkan. Justifikasi manajemen diperlukan untuk menentukan jumlah aset pajak tangguhan yang dapat diakui, sesuai dengan waktu yang tepat dan tingkat laba fiskal di masa mendatang sejalan dengan strategi rencana perpajakan ke depan.

g. Revaluasi aset tetap

Revaluasi aset tetap Grup bergantung pada pemilihan asumsi yang digunakan oleh penilai independen dalam menghitung jumlah-jumlah tersebut. Asumsi tersebut termasuk antara lain: tingkat diskonto, nilai tukar, tingkat inflasi dan tingkat kenaikan pendapatan dan biaya. Grup berkeyakinan bahwa asumsi tersebut adalah wajar dan sesuai, perbedaan signifikan dalam asumsi yang ditetapkan Grup dapat memengaruhi secara material nilai aset tetap yang direvaluasi.

h. Konsolidasian entitas terstruktur

Dalam menentukan tingkat pengendalian yang dimiliki, Grup mempertimbangkan apakah entitas tersebut memenuhi definisi Entitas Terstruktur dan apakah Grup, secara substansi, mengendalikan entitas tersebut.

Ketika Grup, secara substansi, mengendalikan entitas terstruktur tersebut, entitas tersebut dikonsolidasikan oleh Grup.

***3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS** (continued)*

Key sources of estimation uncertainty and judgements: (continued)

***e. Transition from SFAS 104 to SFAS 117** (continued)*

Therefore, the Group applied the fair value approaches for these groups of contracts. The Group exercises judgements in determining the transition approaches, applying the transition methods and measuring the transition impacts on the transition date, which will affect the amounts recognised in the consolidated financial statements on the transition date.

f. Deferred tax asset

Deferred tax assets are recognized for the future recoverable taxable income arising from deductible temporary difference. Management judgment is required to determine the amount of deferred tax assets that can be recognized, based upon the likely timing on level of future taxable profits together with future strategic planning.

g. Fixed asset revaluation

The Group's fixed assets revaluation depends on its selection of certain assumptions used by the independent appraisal in calculating such amounts. Those assumptions include among others: discount rate, exchange rate, inflation rate and revenue and cost increase rate. The Group believes that its assumptions are reasonable and appropriate and significant differences in the Group's assumptions may materially affect the valuation of its fixed assets.

h. Consolidation of structured entities

In determining the degree of control exercised, the Group considers whether these entities meet the definition of Structured Entities and whether the Group, in substance, controls such entities.

When the Group, in substance, controls the entity to which the financial assets have been transferred, the entity is consolidated by the Group.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi dan pertimbangan: (lanjutan)

i. Menentukan jangka waktu kontrak dengan opsi perpanjangan dan penghentian kontrak - Grup sebagai *lessee*

Grup menentukan jangka waktu sewa sebagai jangka waktu sewa yang tidak dapat dibatalkan, bersama dengan periode yang dicakup oleh opsi untuk memperpanjang masa sewa jika dipastikan akan dilaksanakan, atau periode apapun yang dicakup oleh opsi untuk menghentikan sewa, jika cukup wajar untuk tidak dilakukan.

Grup memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan penghentian jangka waktu sewa. Grup menerapkan penilaian dalam mengevaluasi apakah dapat dipastikan jika akan menggunakan opsi untuk memperpanjang atau menghentikan sewa. Hal tersebut dilakukan dengan mempertimbangkan seluruh fakta dan keadaan yang relevan yang memberikan insentif ekonomi untuk melakukan perpanjangan atau penghentian sewa. Setelah tanggal dimulainya, Grup menilai kembali masa sewa, jika terdapat peristiwa atau perubahan signifikan dalam keadaan yang berada dalam kendali dan memengaruhi apakah *lessee* cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

j. Penurunan nilai aset non-keuangan

Grup mengevaluasi penurunan nilai aset apabila terdapat kejadian atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat aset tidak dapat dipulihkan kembali. Faktor-faktor penting yang dapat menyebabkan penelaahan penurunan nilai adalah sebagai berikut:

a) performa yang tidak tercapai secara signifikan terhadap ekspektasi historis atau proyeksi hasil operasi di masa yang akan datang;
b) perubahan yang signifikan dalam cara penggunaan aset atau strategi bisnis secara keseluruhan; dan
c) industri atau tren ekonomi yang secara signifikan bernilai negatif.

Grup mengakui kerugian penurunan nilai apabila nilai tercatat aset melebihi nilai yang dapat dipulihkan. Jumlah terpulihkan adalah nilai yang lebih tinggi antara nilai wajar dikurang biaya untuk menjual dengan nilai pakai aset (atau unit penghasil kas). Jumlah terpulihkan diestimasi untuk aset individual atau, jika tidak memungkinkan, untuk unit penghasil kas yang mana aset tersebut merupakan bagian daripada unit tersebut.

***3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS** (continued)*

Key sources of estimation uncertainty and judgements: (continued)

i. Determine the contract term with extension and contract termination options - the Group as lessee

The Group determines the lease term as non-cancellable term, together with the period covered by the option to extend the lease if it is determined to be exercised, or any period covered by the option to terminate the lease, if it is reasonably certain not to be exercised.

The Group has several lease contracts that include extension and contract termination in the lease terms. The Group applies its judgment in evaluating whether it is certain to exercise the option to extend or terminate the lease. This is done by considering all relevant facts and circumstances that provide economic incentives to extend or terminate the lease. After the commencement date, the Group reassesses the lease term, if there is a significant event or change in circumstances which is under its control and affects whether the lessee is certain enough to exercise the option to extend or terminate the lease.

j. Impairment of non-financial assets

The Group assesses impairment of assets whenever events or changes in circumstances that would indicate that the carrying amount of an asset may not be recoverable. The factors that the Group considers important which could trigger an impairment review include the following:

a) significant underperformance relative to expected historical or projected future operating results;

b) significant changes in the manner of use of the acquired assets or the strategy for overall business; and
c) significant negative industry or economic trends.

The Group recognizes an impairment loss whenever the carrying amount of an asset exceeds its recoverable amount. The recoverable amount is the higher of an asset's (or cash-generating unit's) fair value less costs to sell and its value in use. Recoverable amounts are estimated for individual assets or, if it is not possible, for the cash-generating unit to which the asset belongs.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Sumber utama ketidakpastian estimasi dan pertimbangan: (lanjutan)

j. Penurunan nilai aset non-keuangan (lanjutan)

Pembalikan rugi penurunan nilai, untuk aset selain *goodwill*, diakui jika, dan hanya jika, terdapat perubahan estimasi yang digunakan dalam menentukan jumlah terpulihkan aset sejak pengujian penurunan nilai terakhir kali. Pembalikan rugi penurunan nilai tersebut diakui segera dalam laba rugi, tetapi tidak boleh melebihi akumulasi rugi penurunan nilai yang telah diakui sebelumnya. Rugi penurunan nilai yang diakui atas *goodwill* tidak dibalik lagi.

k. *Additional Tier 1 Perpetual Non-Cumulative Capital Securities ("AT-1 Capital")*

Dalam mengklasifikasikan *AT-1 Capital* sebagai liabilitas keuangan, Bank telah menetapkan bahwa dalam *terms and conditions*, terdapat klausul *mandatory redemption - redemption for a capital trigger event* dimana ketika *Capital Adequacy Ratio* ("CAR") BNI mencapai rasio tertentu maka BNI harus melakukan pelunasan terhadap pokok terutang dan bunga dari *AT-1 Capital*. Hal ini telah memenuhi kriteria *contingent settlement* yang bersifat *genuine* dan tidak dapat dihindari sehingga akan menimbulkan kewajiban kontraktual di masa yang akan datang. Dalam mengklasifikasikan *AT-1 Capital* pada liabilitas keuangan, Bank telah menetapkan bahwa *AT-1 Capital* tersebut telah memenuhi persyaratan klasifikasi sebagaimana disebutkan di atas.

l. Aturan Perpajakan *OECD Pillar* Dua

Dalam menerapkan aturan perpajakan terkait dengan model OECD Pilar Dua, Grup melakukan penilaian terhadap Pilar Dua dengan asumsi bahwa Bank bertindak sebagai Entitas Induk Utama.

***3. USE OF CRITICAL ACCOUNTING ESTIMATES AND JUDGMENTS** (continued)*

Key sources of estimation uncertainty and judgements: (continued)

***j. Impairment of non-financial assets** (continued*

Reversal on impairment loss for assets other than goodwill would be recognized if, and only if, there has been a change in the estimates used to determine the assets' recoverable amount since the last impairment test was carried out. Reversal on impairment losses will be immediately recognized in profit or loss, but not in excess of any accumulated impairment loss previously recognized. Impairment losses relating to goodwill would not be reversed.

k. Additional Tier 1 Perpetual Non-Cumulative Capital Securities ("AT-1 Capital")

In classifying AT-1 Capital as a financial liability, the Bank has determined that in terms and conditions, there is a mandatory redemption clause - redemption for a capital trigger event where when BNI's Capital Adequacy Ratio ("CAR") reaches a certain ratio, BNI shall repay the outstanding principal and interest from AT-1 Capital. This has met the criteria for contingent settlement which is genuine and unavoidable hence that it will create contractual obligations in the future. In classifying AT-1 Capital as a financial liability, the Bank has determined that the AT-1 Capital has met the classification requirements as stated above.

l. OECD Pillar Two Tax Rules

In applying tax rules related to Pillar Two OECD, Group assessed Pillar Two on the assumption that the Bank acted as the Ultimate Parent Entity.

4. KAS / *4. CASH*

Kas terdiri dari: / *Cash consists of the following:*

	2025	2024	
Rupiah	12,106,341	12,614,225	*Rupiah*
Mata uang asing			*Foreign currencies*
Dolar Amerika Serikat	746,995	649,059	*United States Dollar*
Dolar Singapura	219,099	257,628	*Singapore Dollar*
Euro Eropa	106,947	53,413	*European Euro*
Dolar Australia	57,629	23,560	*Australian Dollar*
Yen Jepang	28,750	7,761	*Japanese Yen*
Dolar Hong Kong	15,733	18,310	*Hong Kong Dollar*
Pound Sterling Inggris	11,486	19,569	*Great Britain Pound Sterling*
Riyal Arab Saudi	10,103	27,076	*Saudi Arabian Riyal*
Franc Swiss	9,673	11,385	*Swiss Franc*
Yuan China	9,480	5,567	*Chinese Yuan*
Ringgit Malaysia	8,346	1,463	*Malaysian Ringgit*
Dolar Kanada	7,447	8,248	*Canadian Dollar*
Dirham Uni Emirat Arab	4,139	8,029	*United Arab Emirates Dirham*
Dolar Brunei	2,741	2,474	*Brunei Dollar*
Baht Thailand	2,432	286	*Thailand Baht*
Dolar Selandia Baru	1,973	1,113	*New Zealand Dollar*
Won Korea Selatan	1,730	406	*South Korean Won*
Dolar Taiwan	1,021	358	*Taiwan Dollar*
	1,245,724	1,095,705	
	13,352,065	**13,709,930**	

Saldo dalam mata uang Rupiah termasuk uang pada mesin ATM (Anjungan Tunai Mandiri) sejumlah Rp4.186.787 dan Rp4.690.396 masing-masing pada tanggal 31 Desember 2025 dan 2024.

The Rupiah balance includes cash in ATMs (Automatic Teller Machines) of Rp4,186,787 and Rp4,690,396 as of 31 December 2025 and 2024, respectively.

5. GIRO PADA BANK INDONESIA / *5. CURRENT ACCOUNTS WITH BANK INDONESIA*

	2025	2024	
Rupiah	71,516,557	43,716,990	*Rupiah*
Dolar Amerika Serikat	8,472,565	7,952,064	*United States Dollar*
	79,989,122	**51,669,054**	

Giro Wajib Minimum (GWM) Bank sesuai dengan Peraturan Bank Indonesia dan Peraturan Anggota Dewan Gubernur (PADG) diungkapkan pada Catatan 61a.

Minimum Statutory Reserves (GWM) Bank in accordance with Bank Indonesia (BI) Regulation and Members of The Board of Governors (PADG) regulation are disclosed in Note 61a.

6. GIRO PADA BANK LAIN / *6. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan mata uang / *a. By currency*

	2025	2024	
Rupiah	421,836	192,342	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	13,370,355	10,015,639	*United States Dollar*
Yen Jepang	7,095,434	7,775,337	*Japanese Yen*
Dolar Singapura	2,484,897	1,511,752	*Singapore Dollar*
Euro Eropa	1,063,794	791,024	*European Euro*
Yuan China	580,946	1,167,916	*Chinese Yuan*
Dolar Hong Kong	199,963	37,852	*Hong Kong Dollar*
Dolar Kanada	183,481	15,731	*Canadian Dollar*
Pound Sterling Inggris	153,734	121,862	*Great Britain Pound Sterling*
Franc Swiss	142,447	24,730	*Swiss Franc*
Dolar Australia	114,585	118,223	*Australian Dollar*
Won Korea Selatan	40,517	149,697	*South Korean Won*
Dirham Uni Emirat Arab	23,175	38,266	*United Arab Emirates Dirham*
Ringgit Malaysia	19,425	34,500	*Malaysian Ringgit*
Baht Thailand	17,638	11,717	*Thailand Baht*
Dolar Selandia Baru	14,573	8,244	*New Zealand Dollar*
Riyal Arab Saudi	11,293	59,354	*Saudi Arabian Riyal*
	25,516,257	21,881,844	
Total	25,938,093	22,074,186	*Total*
Cadangan kerugian penurunan nilai	(7)	(13)	*Allowance for impairment losses*
	25,938,086	**22,074,173**	

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	27,183	25,703	*Rupiah*
Mata uang asing	52,816	17,271	*Foreign currencies*
Total pihak berelasi	79,999	42,974	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	394,653	166,639	*Rupiah*
Mata uang asing	25,463,441	21,864,573	*Foreign currencies*
Total pihak ketiga	25,858,094	22,031,212	*Total third parties*
Total	25,938,093	22,074,186	*Total*
Cadangan kerugian penurunan nilai	(7)	(13)	*Allowance for impairment losses*
	25,938,086	**22,074,173**	

6. GIRO PADA BANK LAIN (lanjutan)

c. Berdasarkan kolektibilitas sesuai Peraturan OJK

Kolektibilitas giro pada bank lain sesuai Peraturan OJK diungkapkan pada Catatan 61b.

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

6. CURRENT ACCOUNTS WITH OTHER BANKS *(continued)*

c. By Financial Service Authority Rule collectibility

Collectibility of current accounts with other banks in accordance with Financial Service Authority Rule (FSA) are disclosed in Note 61b.

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	22,074,186	-	-	22,074,186	*Beginning balance*
Pengukuran kembali bersih*)	20,889,598	-	-	20,889,598	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	33,979,391	-	-	33,979,391	*New financial assets originated or purchased*
Pembayaran penuh	(52,165,045)	-	-	(52,165,045)	*Fully repayment*
Valuta asing dan perubahan lain	1,159,963	-	-	1,159,963	*Foreign exchange and other movements*
	25,938,093	**-**	**-**	**25,938,093**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	35,022,769	-	-	35,022,769	*Beginning balance*
Pengukuran kembali bersih*)	65,872,596	-	-	65,872,596	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	17,167,228	-	-	17,167,228	*New financial assets originated or purchased*
Pembayaran penuh	(95,411,752)	-	-	(95,411,752)	*Fully repayment*
Valuta asing dan perubahan lain	(576,655)	-	-	(576,655)	*Foreign exchange and other movements*
	22,074,186	**-**	**-**	**22,074,186**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

6. GIRO PADA BANK LAIN (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

6. CURRENT ACCOUNTS WITH OTHER BANKS *(continued)*

d. Gross carrying amount and allowance for impairment losses *(continued)*

The movements in the allowance for impairment losses are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	13	-	-	13	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	16	-	-	16	*Net remeasurement of loss allowance*
Pembayaran penuh	(33)	-	-	(33)	*Fully repayment*
Aset keuangan baru yang diterbitkan atau dibeli	11	-	-	11	*New financial assets originated or purchased*
	7	**-**	**-**	**7**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Giro pada bank lain					***Current accounts with other banks***
Saldo awal	7	-	-	7	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	16	-	-	16	*Net remeasurement of loss allowance*
Pembayaran penuh	(12)	-	-	(12)	*Fully repayment*
Aset keuangan baru yang diterbitkan atau dibeli	2	-	-	2	*New financial assets originated or purchased*
	13	**-**	**-**	**13**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai telah memadai.

Management believes that the allowance for impairment losses is adequate.

6. GIRO PADA BANK LAIN (lanjutan)

6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

e. Tingkat suku bunga per tahun

e. Annual interest rates

	Dolar Amerika Serikat/ *United States Dollar* %	Yuan China/ *Chinese Yuan* %	Dolar Australia/ *Australian Dollar* %	Euro Eropa/ *European Euro* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	Franc Swiss/ *Swiss Franc* %	
2025	0.00 - 3.85	0.00 - 0.75	0.00 - 1.05	0.00 - 0.10	0.00 - 0.50	0.00 - 0.30	*2025*
2024	0.00 - 4.25	0.00 - 0.75	0.00 - 1.55	-	-	-	*2024*

Giro pada bank lain selain dalam mata uang Dolar Amerika Serikat, Yuan China, Dolar Australia, Euro Eropa, Pound Sterling Inggris, dan Franc Swiss tidak mendapat bunga.

Current accounts with other banks stated in currency other than United States Dollar, Chinese Yuan, Australian Dollar, European Euro, Great Britain Pound Sterling, and Swiss Franc do not earn interest.

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA

a. Berdasarkan jenis dan mata uang

a. By type and currency

Perincian penempatan pada bank lain dan Bank Indonesia berdasarkan mata uang adalah sebagai berikut:

Placements with other banks and Bank Indonesia based on currencies are as follows:

	2025	2024	
Rupiah			***Rupiah***
Bank Indonesia - *Deposit Facility*	2,831,950	1,030,850	*Bank Indonesia - Deposit Facility*
Call Money			*Call Money*
PT Bank CIMB Niaga Tbk	300,000	100,000	*PT Bank CIMB Niaga Tbk*
PT Bank Mega Tbk	200,000	150,000	*PT Bank Mega Tbk*
Deutsche Bank AG.	184,780	184,780	*Deutsche Bank AG.*
PT Bank Pembangunan Daerah Yogyakarta	100,000	-	*PT Bank Pembangunan Daerah Yogyakarta*
PT Bank Syariah Indonesia Tbk	100,000	-	*PT Bank Syariah Indonesia Tbk*
PT Bank KB Bukopin Tbk	30,000	31,000	*PT Bank KB Bukopin Tbk*
PT Bank UOB Indonesia	-	250,000	*PT Bank UOB Indonesia*
PT Bank Danamon Indonesia Tbk	-	250,000	*PT Bank Danamon Indonesia Tbk*
PT Bank Maybank Indonesia Tbk	-	150,000	*PT Bank Maybank Indonesia Tbk*
PT Bank Jakarta	-	150,000	*PT Bank Jakarta*
PT China Construction Bank Indonesia Tbk	-	100,000	*PT China Construction Bank Indonesia Tbk*
PT Bank Pembangunan Daerah Jawa Tengah	-	100,000	*PT Bank Pembangunan Daerah Jawa Tengah*
PT Bank Victoria International Tbk	-	15,000	*PT Bank Victoria International Tbk*
Subtotal	914,780	1,480,780	*Subtotal*
Deposito berjangka	753,759	1,327,238	*Time deposits*
	4,500,489	3,838,868	

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)

a. Berdasarkan jenis dan mata uang (lanjutan)

a. By type and currency (continued)

Perincian penempatan pada bank lain dan Bank Indonesia berdasarkan mata uang adalah sebagai berikut: (lanjutan)

Placements with other banks and Bank Indonesia based on currencies are as follows: (continued)

	2025	2024	
Mata uang asing			***Foreign currencies***
Bank Indonesia - *Deposit Facility*	25,846,250	9,093,705	*Bank Indonesia - Deposit Facility*
Call Money			*Call Money*
JP Morgan Chase	660,614	498,977	*JP Morgan Chase*
Standard Chartered Bank Indonesia	264,295	246,358	*Standard Chartered Bank Indonesia*
Bank of New York Mellon	86,709	113,470	*Bank of New York Mellon*
PT Bank Syariah Indonesia Tbk	-	402,375	*PT Bank Syariah Indonesia Tbk*
Wachovia Bank	-	333,971	*Wachovia Bank*
PT Bank ICBC Indonesia	-	66,150	*PT Bank ICBC Indonesia*
Subtotal	1,011,618	1,661,301	*Subtotal*
Deposito berjangka			*Time deposits*
Bank BRI Singapore	833,750	-	*Bank BRI Singapore*
Bank BRI New York	500,250	-	*Bank BRI New York*
Woori Bank Seoul	421,940	784,815	*Woori Bank Seoul*
The San-In Godo Bank	300,150	160,950	*The San-In Godo Bank*
The Chugoku Bank Limited	200,100	160,950	*The Chugoku Bank Limited*
Bank Mandiri Europe	150,075	160,950	*Bank Mandiri Europe*
Standard Chartered Bank Indonesia	12,435	4,142	*Standard Chartered Bank Indonesia*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	2,936	2,829	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
Canara Bank New York	-	885,225	*Canara Bank New York*
Bank Mandiri Cayman Island	-	321,900	*Bank Mandiri Cayman Island*
Subtotal	2,421,636	2,481,761	*Subtotal*
	29,279,504	13,236,767	
Total	33,779,993	17,075,635	*Total*
Cadangan kerugian penurunan nilai	(78)	(194)	*Allowance for impairment losses*
	33,779,915	**17,075,441**	

Berdasarkan mata uang

By currency

	2025	2024	
Rupiah	4,500,489	3,838,868	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	28,857,564	12,466,277	*United States Dollar*
Won Korea Selatan	421,940	704,340	*South Korean Won*
Yuan China	-	66,150	*Chinese Yuan*
	29,279,504	13,236,767	
Total	33,779,993	17,075,635	*Total*
Cadangan kerugian penurunan nilai	(78)	(194)	*Allowance for impairment losses*
	33,779,915	**17,075,441**	

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)

b. Berdasarkan hubungan

b. By relationship

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Deposito berjangka	470,069	734,966	*Time deposits*
Call Money	100,000	-	*Call Money*
	570,069	734,966	
Mata uang asing			***Foreign currencies***
Deposito *berjangka*	1,484,075	482,850	*Time Deposits*
Call Money	-	402,375	*Call Money*
	1,484,075	885,225	
Total pihak berelasi	2,054,144	1,620,191	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Bank Indonesia - *Deposit Facility*	2,831,950	1,030,850	*Bank Indonesia - Deposit Facility*
Call Money	814,780	1,480,780	*Call Money*
Deposito berjangka	283,690	592,272	*Time deposits*
	3,930,420	3,103,902	
Mata uang asing			***Foreign currencies***
Bank Indonesia - *Deposit Facility*	25,846,250	9,093,705	*Bank Indonesia - Deposit Facility*
Call Money	1,011,618	1,258,926	*Call Money*
Deposito berjangka	937,561	1,998,911	*Time deposits*
	27,795,429	12,351,542	
Total pihak ketiga	31,725,849	15,455,444	*Total third parties*
Total	33,779,993	17,075,635	*Total*
Cadangan kerugian penurunan nilai	(78)	(194)	*Allowance for impairment losses*
	33,779,915	**17,075,441**	

c. Berdasarkan kolektibilitas sesuai Peraturan OJK

Kolektibilitas penempatan pada bank lain dan Bank Indonesia sesuai Peraturan OJK diungkapkan pada Catatan 61c.

c. By Financial Service Authority Rule collectibility

Collectibility of placement with other bank and Bank Indonesia in accordance with Financial Service Authority Rule are disclosed in Note 61c.

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Penempatan pada bank lain dan Bank Indonesia					***Placements with other banks and Bank Indonesia***
Saldo awal	17,075,635	-	-	17,075,635	*Beginning balance*
Pengukuran kembali bersih*)	(384,589,911)	-	-	(384,589,911)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	401,273,799	-	-	401,273,799	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	20,470	-	-	20,470	*Foreign exchange and other movements*
	33,779,993	**-**	**-**	**33,779,933**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Penempatan pada bank lain dan Bank Indonesia					***Placements with other banks and Bank Indonesia***
Saldo awal	43,794,264	-	-	43,794,264	*Beginning balance*
Pengukuran kembali bersih*)	(311,889,914)	-	-	(311,889,914)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	285,196,141	-	-	285,196,141	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	(24,856)	-	-	(24,856)	*Foreign exchange and other movements*
	17,075,635	**-**	**-**	**17,075,635**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

7. PENEMPATAN PADA BANK LAIN DAN BANK INDONESIA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

7. PLACEMENTS WITH OTHER BANKS AND BANK INDONESIA (continued)

d. Gross carrying amount and allowance for impairment losses (continued)

The movements in the allowance for impairment losses are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Penempatan pada bank lain dan Bank Indonesia					***Placement with other banks and Bank Indonesia***
Saldo awal	194	-	-	194	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(379)	-	-	(379)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	263	-	-	263	*New financial assets originated or purchased*
	78	**-**	**-**	**78**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Penempatan pada bank lain dan Bank Indonesia					***Placement with other banks and Bank Indonesia***
Saldo awal	98	-	-	98	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(164)	-	-	(164)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	260	-	-	260	*New financial assets originated or purchased*
	194	**-**	**-**	**194**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses is adequate.

e. Penempatan pada bank lain dan Bank Indonesia yang digunakan sebagai jaminan

Tidak terdapat penempatan pada bank lain dan Bank Indonesia yang digunakan sebagai jaminan pada tanggal 31 Desember 2025 dan 2024.

e. Placements with other banks and Bank Indonesia pledged as collateral

There were no placements in other banks and Bank Indonesia that were pledged as collateral as of 31 December 2025 and 2024.

f. Tingkat suku bunga per tahun

f. Annual interest rates

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Won Korea Selatan/*South Korean Won* %	Yuan China/*Chinese Yuan* %	
2025	1.00 - 6.50	2.00 - 4.15	2.60 - 2.80	-	*2025*
2024	0.00 - 7.00	2.00 - 5.17	3.10 - 3.20	3.85	*2024*

8. EFEK-EFEK / *8. MARKETABLE SECURITIES*

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025		2024		
	Nilai nominal/ *Nominal value*	Nilai tercatat/ *Carrying Value*	Nilai nominal/ *Nominal value*	Nilai tercatat/ *Carrying value*	
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Rupiah					***Rupiah***
Sekuritas Rupiah Bank Indonesia (SRBI)	25,531,646	25,050,558	18,871,845	18,495,796	*Bank Indonesia Rupiah Securities (SRBI)*
Reksadana	2,903,680	3,417,021	2,553,060	2,848,847	*Mutual funds*
Obligasi	1,868,960	1,925,824	1,071,102	1,296,808	*Bonds*
Obligasi subordinasi	128,000	130,896	119,500	121,725	*Subordinated bonds*
Efek lainnya*)	1,288,065	1,265,695	1,316,703	1,160,733	*Other securities*[*)]
	31,720,351	31,789,994	23,932,210	23,923,909	
Mata uang asing					***Foreign currencies***
Reksadana	10,481	10,450	20,581	35,705	*Mutual funds*
	10,481	10,450	20,581	35,705	
Total nilai wajar melalui laba rugi	**31,730,832**	**31,800,444**	**23,952,791**	**23,959,614**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Rupiah					***Rupiah***
Reksadana	20,382,753	21,031,906	18,690,000	18,046,755	*Mutual funds*
Obligasi	5,424,975	5,548,291	4,618,744	4,414,877	*Bonds*
Sekuritas Rupiah Bank Indonesia (SRBI)	2,985,610	2,925,099	-	-	*Bank Indonesia Rupiah Securities (SRBI)*
Obligasi subordinasi	178,300	181,436	235,300	230,581	*Subordinated bonds*
	28,971,638	29,686,732	23,544,044	22,692,213	
Mata uang asing					***Foreign currencies***
Reksadana	833,750	840,822	804,750	789,302	*Mutual funds*
Obligasi	608,638	588,747	733,932	705,927	*Bonds*
Sekuritas Valuta Asing Bank Indonesia (SVBI)	33,350	33,270	-	-	*Bank Indonesia Foreign Currency Securities (SVBI)*
	1,475,738	1,462,839	1,538,682	1,495,229	
Total nilai wajar melalui penghasilan komprehensif lain	**30,447,376**	**31,149,571**	**25,082,726**	**24,187,442**	***Total fair value through other comprehensive income***
Biaya perolehan diamortisasi					***Amortised cost***
Rupiah					***Rupiah***
Obligasi	-	-	300,000	300,000	*Bonds*
Efek lainnya	-	-	80	80	*Other securities*
	-	-	300,080	300,080	
Mata uang asing					***Foreign currencies***
Obligasi	66,700	66,680	64,380	64,339	*Bonds*
Efek lainnya	-	-	22,871	22,871	*Other securities*
	66,700	66,680	87,251	87,210	
Total biaya perolehan diamortisasi	**66,700**	**66,680**	**387,331**	**387,290**	***Total amortised cost***
Total efek-efek		**63,016,695**		**48,534,346**	***Total marketable securities***
Cadangan kerugian penurunan nilai		(15)		(273)	*Allowance for impairment losses*
		63,016,680		**48,534,073**	

*) Termasuk di dalam efek-efek lainnya adalah saham yang tercatat di bursa - dimiliki untuk diperdagangkan.

*) *Including in other securities are listed shares - held-for-trading.*

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

Perincian efek-efek berdasarkan mata uang adalah sebagai berikut:

Marketable securities based on currencies are as follow:

	2025	2024	
Rupiah	61,476,726	46,916,202	*Rupiah*
Mata uang asing			*Foreign currency*
Dolar Amerika Serikat	1,539,969	1,618,144	*United States Dollar*
Total	63,016,695	48,534,346	*Total*
Cadangan kerugian penurunan nilai	(15)	(273)	*Allowance for impairment losses*
	63,016,680	**48,534,073**	

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	11,974,845	9,857,620	*Rupiah*
Mata uang asing	257,895	299,795	*Foreign currencies*
Total pihak berelasi	12,232,740	10,157,415	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	49,501,881	37,058,582	*Rupiah*
Mata uang asing	1,282,074	1,318,349	*Foreign currencies*
Total pihak ketiga	50,783,955	38,376,931	*Total third parties*
Total	63,016,695	48,534,346	*Total*
Cadangan kerugian penurunan nilai	(15)	(273)	*Allowance for impairment losses*
	63,016,680	**48,534,073**	

c. Berdasarkan penerbit / *c. By issuer*

	2025	2024	
Korporasi	31,591,568	27,992,999	*Corporates*
Bank Indonesia	28,008,927	18,495,796	*Bank Indonesia*
Bank	3,416,200	2,045,551	*Banks*
Total	63,016,695	48,534,346	*Total*
Cadangan kerugian penurunan nilai	(15)	(273)	*Allowance for impairment losses*
	63,016,680	**48,534,073**	

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat / *d. By rating*

	2025			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Nilai wajar melalui laba rugi				***Fair value through profit or loss***
Rupiah				***Rupiah***
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	25,050,558	*Bank Indonesia Rupiah Securities (SRBI)*
Reksadana	-	-	3,417,021	*Mutual funds*
Obligasi	Beragam/*Various*	Beragam/*Various*	1,925,824	*Bonds*
Obligasi subordinasi	Beragam/*Various*	Beragam/*Various*	130,896	*Subordinated bonds*
Efek lainnya	Beragam/*Various*	Beragam/*Various*	1,265,695	*Other securities*
Subtotal			31,789,994	*Subtotal*
Mata uang asing				***Foreign currencies***
Reksadana	-	-	10,450	*Mutual funds*
Subtotal			10,450	*Subtotal*
Total nilai wajar melalui laba rugi			**31,800,444**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain				***Fair value through other comprehensive income***
Rupiah				***Rupiah***
Reksadana	-	-	21,031,906	*Mutual funds*
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	2,925,099	*Bank Indonesia Rupiah Securities (SRBI)*
Obligasi subordinasi				*Subordinated bonds*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	170,606	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank UOB Indonesia	Fitch	AAA(idn)	10,830	*PT Bank UOB Indonesia*
			181,436	
Obligasi				***Bonds***
PT Bank Mandiri (Persero) Tbk	Pefindo	idAAA	1,110,470	*PT Bank Mandiri (Persero) Tbk*
PT Sarana Multigriya Finansial (Persero)	Pefindo	idAAA	811,484	*PT Sarana Multigriya Finansial (Persero)*
PT Pegadaian (Persero)	Pefindo	idAAA	434,245	*PT Pegadaian (Persero)*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	419,296	*PT Sarana Multi Infrastruktur (Persero)*
PT Hutama Karya (Persero)	Pefindo	idAA-	393,958	*PT Hutama Karya (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	Pefindo	idAAA	355,215	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Chandra Asri Petrochemical Tbk	Pefindo	idAA-	333,886	*PT Chandra Asri Petrochemical Tbk*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	330,372	*PT Perusahaan Listrik Negara (Persero)*
PT Permodalan Nasional Madani	Pefindo	idAAA	165,411	*PT Permodalan Nasional Madani*
PT Mandiri Tunas Finance	Pefindo	idAAA	159,690	*PT Mandiri Tunas Finance*
PT Indosat Tbk	Pefindo	idAAA	156,083	*PT Indosat Tbk*
PT Adira Dinamika Multi Finance Tbk	Pefindo	idAAA	140,112	*PT Adira Dinamika Multi Finance Tbk*
PT Integrasi Jaringan Ekosistem	Pefindo	idA	122,093	*PT Integrasi Jaringan Ekosistem*
PT Bank Pembangunan Daerah Jawa Timur Tbk	Pefindo	idAA-	94,487	*PT Bank Pembangunan Daerah Jawa Timur Tbk*
PT Bank Pan Indonesia Tbk	Pefindo	idAA	75,646	*PT Bank Pan Indonesia Tbk*
PT XL Axiata Tbk	Pefindo	idAA-	62,909	*PT XL Axiata Tbk*
PT Bank Maybank Indonesia Tbk	Pefindo	idAAA	61,209	*PT Bank Maybank Indonesia Tbk*
PT Pupuk Indonesia Holding Company (Persero)	Pefindo	idAAA	50,123	*PT Pupuk Indonesia Holding Company (Persero)*
PT Indonesia Infrastructure Finance	Pefindo	idAAA	44,401	*PT Indonesia Infrastructure Finance*
PT Kereta Api Indonesia (Persero)	Pefindo	idAAA	43,532	*PT Kereta Api Indonesia (Persero)*
PT Bank Tabungan Negara (Persero) Tbk	Pefindo	idAAA	28,297	*PT Bank Tabungan Negara (Persero) Tbk*
PT Astra Sedaya Finance	Pefindo	idAAA	25,391	*PT Astra Sedaya Finance*
PT Bank Syariah Indonesia Tbk	Pefindo	idAAA	21,356	*PT Bank Syariah Indonesia Tbk*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	17,750	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank Mandiri Taspen	Pefindo	idAAA	10,097	*PT Bank Mandiri Taspen*
PT Mayora Indah Tbk	Pefindo	idAA	10,008	*PT Mayora Indah Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	70,770	*Others*
			5,548,291	
Subtotal			29,686,732	*Subtotal*

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat (lanjutan) / *d. By rating (continued)*

	2025			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Nilai wajar melalui penghasilan komprehensif lain (lanjutan)				***Fair value through other comprehensive income** (continued)*
Mata uang asing				***Foreign currencies***
Reksadana	-	-	840,822	*Mutual fund*
Sekuritas Valas Bank Indonesia (SVBI)	-	-	33,270	*Bank Indonesia Foreign Currency Securities (SVBI)*
Obligasi				*Bonds*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	108,088	*PT Perusahaan Listrik Negara (Persero)*
Bank Of America Corporation	Fitch	AA	83,631	*Bank Of America Corporation*
Truist Bank	Fitch	A	82,985	*Truist Bank*
M&T Bank Corporation	Fitch	A	81,429	*M&T Bank Corporation*
The Huntington National Bank	Fitch	A-	79,536	*The Huntington National Bank*
JP Morgan Chase Bank, N.A.	Fitch	AA	78,952	*JP Morgan Chase Bank, N.A.*
PT Pertamina (Persero)	Fitch	BBB	74,126	*PT Pertamina (Persero)*
			588,747	
Subtotal			1,462,839	*Subtotal*
Total nilai wajar pada penghasilan komprehensif lain			**31,149,571**	***Total fair value through other comprehensive income***
Mata uang asing				***Foreign currencies***
Obligasi				*Bonds*
PT Bank Mandiri (Persero) Tbk	Pefindo	idAAA	66,680	*PT Bank Mandiri (Persero) Tbk*
Subtotal			66,680	*Subtotal*
Total biaya perolehan diamortisasi			**66,680**	***Total amortised cost***
Total efek-efek			**63,016,695**	***Total marketable securities***
Cadangan kerugian penurunan nilai			(15)	*Allowance for impairment losses*
Efek-efek - bersih			**63,016,680**	***Marketable securities - net***

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat (lanjutan) / *d. By rating (continued)*

	2024			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Nilai wajar melalui laba rugi				***Fair value through profit or loss***
Rupiah				***Rupiah***
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	18,495,796	*Bank Indonesia Rupiah Securities (SRBI)*
Reksadana	-	-	2,848,847	*Mutual funds*
Obligasi	Beragam/*Various*	Beragam/*Various*	1,296,808	*Bonds*
Obligasi subordinasi	Beragam/*Various*	Beragam/*Various*	121,725	*Subordinated bonds*
Efek lainnya	Beragam/*Various*	Beragam/*Various*	1,160,733	*Other securities*
Subtotal			23,923,909	*Subtotal*
Mata uang asing				***Foreign currencies***
Reksadana	-	-	35,705	*Mutual funds*
Subtotal			35,705	*Subtotal*
Total nilai wajar melalui laba rugi			**23,959,614**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain				***Fair value through other comprehensive income***
Rupiah				***Rupiah***
Reksadana	-	-	18,046,755	*Mutual funds*
Obligasi subordinasi				*Subordinated bonds*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	151,315	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank Pan Indonesia Tbk	Pefindo	idAA	68,469	*PT Bank Pan Indonesia Tbk*
PT Bank UOB Indonesia	Fitch	AAA(idn)	10,797	*PT Bank UOB Indonesia*
			230,581	
Obligasi				*Bonds*
PT Sarana Multigriya Finansial (Persero)	Pefindo	idAAA	958,662	*PT Sarana Multigriya Finansial (Persero)*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	547,490	*PT Perusahaan Listrik Negara (Persero)*
PT Bank Mandiri (Persero)Tbk	Pefindo	idAAA	431,283	*PT Bank Mandiri (Persero)Tbk*
PT Hutama Karya (Persero)	Pefindo	idAA-	386,870	*PT Hutama Karya (Persero)*
PT Chandra Asri Petrochemical Tbk	Pefindo	idAA-	321,884	*PT Chandra Asri Petrochemical Tbk*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	208,968	*PT Sarana Multi Infrastruktur (Persero)*
PT Indosat Tbk	Pefindo	idAAA	197,509	*PT Indosat Tbk*
PT Permodalan Nasional Madani	Pefindo	idAA+	153,314	*PT Permodalan Nasional Madani*
PT Mandiri Tunas Finance	Pefindo	idAAA	151,539	*PT Mandiri Tunas Finance*
PT Bank Rakyat Indonesia (Persero) Tbk	Pefindo	idAAA	119,588	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Merdeka Battery Materials Tbk	Pefindo	idA	100,080	*PT Merdeka Battery Materials Tbk*
PT XL Axiata Tbk	Pefindo	idAA-	98,009	*PT XL Axiata Tbk*
PT Pegadaian (Persero)	Pefindo	idAAA	97,965	*PT Pegadaian (Persero)*
PT Adira Dinamika Multi Finance Tbk	Pefindo	idAAA	81,513	*PT Adira Dinamika Multi Finance Tbk*
PT Mora Telematika Indonesia Tbk	Pefindo	idA+	83,110	*PT Mora Telematika Indonesia Tbk*
PT Maybank Indonesia Finance	Pefindo	idAAA	79,162	*PT Maybank Indonesia Finance*
PT Bank Pan Indonesia Tbk	Pefindo	idAA	54,969	*PT Bank Pan Indonesia Tbk*
PT Adhi Karya (Persero) Tbk	Pefindo	idA-	49,917	*PT Adhi Karya (Persero) Tbk*
PT Pupuk Indonesia (Persero)	Pefindo	idAAA	49,456	*PT Pupuk Indonesia (Persero)*
PT Kereta Api Indonesia (Persero)	Pefindo	idAAA	41,635	*PT Kereta Api Indonesia (Persero)*
PT Telkom Indonesia Tbk	Pefindo	idAAA	36,830	*PT Telkom Indonesia Tbk*
PT Indonesia Infrastructure Finance	Pefindo	idAAA	33,308	*PT Indonesia Infrastructure Finance*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	Pefindo	idAA	18,450	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank Tabungan Negara (Persero) Tbk	Pefindo	idAAA	15,961	*PT Bank Tabungan Negara (Persero) Tbk*
PT Astra Sedaya Finance	Pefindo	idAAA	14,574	*PT Astra Sedaya Finance*
PT Bank Syariah Indonesia Tbk	Pefindo	idAAA	11,879	*PT Bank Syariah Indonesia Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	70,952	*Others*
			4,414,877	
Subtotal			22,692,212	*Subtotal*

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat (lanjutan) / *d. By rating (continued)*

	2024			
	Pemeringkat/ *Agencies*	**Peringkat/ *Rating***	**Nilai tercatat/ *Carrying value***	
Mata uang asing				***Foreign currencies***
Reksadana	-	-	789,302	*Mutual funds*
Obligasi				*Bonds*
PT Perusahaan Listrik Negara (Persero)	Pefindo	idAAA	102,442	*PT Perusahaan Listrik Negara (Persero)*
Merrill Lynch & Co	Fitch	A	80,794	*Merrill Lynch & Co*
Wachovia Bank, N.A.	Beragam/*various*	Beragam/*various*	79,579	*Wachovia Bank, N.A.*
Suntrust Bank	Fitch	BB+	79,388	*Suntrust Bank*
M&T Bank Corporation	Beragam/*various*	Beragam/*various*	78,895	*M&T Bank Corporation*
JP Morgan Chase Bank, N.A.	Beragam/*various*	Beragam/*various*	77,228	*JP Morgan Chase Bank, N.A.*
The Huntington National Bank	Fitch	BB+	74,587	*The Huntington National Bank*
PT Pertamina (Persero)	Fitch	BBB	67,296	*PT Pertamina (Persero)*
PT Pelabuhan Indonesia (Persero)	Fitch	BBB	65,718	*PT Pelabuhan Indonesia (Persero)*
			705,927	
Subtotal			1,495,229	*Subtotal*
Total nilai wajar pada penghasilan komprehensif lain			**24,187,442**	***Total fair value through other comprehensive income***
Biaya perolehan diamortisasi				***Amortised cost***
Rupiah				***Rupiah***
Obligasi				*Bonds*
PT Sarana Multi Infrastruktur (Persero)	Pefindo	idAAA	200,000	*PT Sarana Multi Infrastruktur (Persero)*
PT Semen Indonesia (Persero) Tbk	Pefindo	idAAA	100,000	*PT Semen Indonesia (Persero) Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	80	*Others*
Subtotal			300,080	*Subtotal*
Mata uang asing				***Foreign currencies***
Obligasi				*Bonds*
PT Bank Mandiri (Persero) Tbk	Pefindo	idAAA	64,339	*PT Bank Mandiri (Persero) Tbk*
Lainnya	Beragam/*various*	Beragam/*various*	22,871	*Others*
Subtotal			87,210	*Subtotal*
Total biaya perolehan diamortisasi			**387,290**	***Total amortised cost***
Total efek-efek			**48,534,346**	***Total marketable securities***
Cadangan kerugian penurunan nilai			(273)	*Allowance for impairment losses*
Efek-efek - bersih			**48,534,073**	***Marketable securities - net***

8. EFEK-EFEK (lanjutan)

e. Berdasarkan kolektibilitas sesuai Peraturan OJK

Kolektibilitas efek-efek sesuai Peraturan OJK diungkapkan pada Catatan 61d.

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

***8. MARKETABLE SECURITIES** (continued)*

e. By Financial Service Authority Rule collectibility

Collectibility marketable securities in accordance with Financial Service Authority Rule are disclosed in Note 61d.

f. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	387,290	-	-	387,290	*Beginning balance*
Pengukuran kembali bersih*)	(320,610)	-	-	(320,610)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	*New financial assets originated or purchased*
	66,680	**-**	**-**	**66,680**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan efek-efek

*Including in the net measurement is sales of marketable securities *)*

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	22,888,639	1,298,803	-	24,187,442	*Beginning balance*
Pengukuran kembali bersih*)	3,422,185	(1,062,773)	-	2,359,412	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	4,579,209	-	-	4,579,209	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	13,970	9,538	-	23,508	*Foreign exchange and other movements*
	30,904,003	**245,568**	**-**	**31,149,571**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan efek-efek

*Including in the net measurement is sales of marketable securities *)*

8. EFEK-EFEK (lanjutan)

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

***8. MARKETABLE SECURITIES** (continued)*

***f. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the gross carrying amount are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	361,524	-	242,791	604,315	*Beginning balance*
Pengukuran kembali bersih*)	2,815	-	-	2,815	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	22,951	-	-	22,951	*New financial assets originated or purchased*
Hapus Buku	-	-	(242,791)	(242,791)	*Write-offs*
	387,290	**-**	**-**	**387,290**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan efek-efek

*Including in the net measurement is sales of marketable securities *)*

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	28,211,090	310,453	-	28,521,543	*Beginning balance*
Pengukuran kembali bersih*)	(7,140,098)	963,271	-	(6,176,827)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,784,069	-	-	1,784,069	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	33,578	25,079	-	58,657	*Foreign exchange and other movements*
	22,888,639	**1,298,803**	**-**	**24,187,442**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan efek-efek

*Including in the net measurement is sales of marketable securities *)*

8. EFEK-EFEK (lanjutan)

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***8. MARKETABLE SECURITIES** (continued)*

***f. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the allowance for impairment losses are as follows: (continued)

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	273	-	-	273	*Beginning balance*
Pengukuran kembali bersih**)	(258)	-	-	(258)	*Net remeasurement**)*
Aset keuangan baru yang diterbitkan atau dibeli	-	-	-	-	*New financial assets originated or purchased*
	15	**-**	**-**	**15**	

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah penjualan efek-efek

**) *Including in the net measurement of loss allowance, is sales of marketable securities.*

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total**)**	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	3,164	2,671	-	5,835	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian**)	(2,758)	(1,881)	-	(4,639)	*Net remeasurement of loss allowance**)*
Aset keuangan baru yang diterbitkan atau dibeli	5,802	-	-	5,802	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	24	73	-	97	*Foreign exchange and other movements*
	6,232	**863**	**-**	**7,095**	

*) Cadangan kerugian penurunan nilai pada efek-efek dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah penjualan efek-efek

*) *Allowance for impairment losses on marketable securities classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

**) *Including in the net measurement of loss allowance, is sales of marketable securities.*

8. EFEK-EFEK (lanjutan)

f. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***8. MARKETABLE SECURITIES** (continued)*

***f. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the allowance for impairment losses are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Efek-efek yang diukur pada biaya perolehan diamortisasi					***Marketable securities at amortised cost***
Saldo awal	151	-	242,790	242,941	*Beginning balance*
Pengukuran kembali bersih**)	119	-	-	119	*Net remeasuremen**)*
Aset keuangan baru yang diterbitkan atau dibeli	3	-	-	3	*New financial assets originated or purchased*
Hapus Buku	-	-	(242,790)	(242,790)	*Write-offs*
	273	**-**	**-**	**273**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total**)**	
Efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Marketable securities at fair value through other comprehensive income***
Saldo awal	1,891	2,538	-	4,429	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian**)	699	(65)	-	634	*Net remeasurement of loss allowance**)*
Aset keuangan baru yang diterbitkan atau dibeli	544	-	-	544	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	30	198	-	228	*Foreign exchange and other movements*
	3,164	**2,671**	**-**	**5,835**	

*) Cadangan kerugian penurunan nilai pada efek-efek dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

**) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah penjualan efek-efek

*) *Allowance for impairment losses on marketable securities classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

**) *Including in the net measurement of loss allowance, is sales of marketable securities.*

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses stated above is adequate.

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

g. Tingkat suku bunga per tahun / *g. Annual interest rates*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Suku Bunga:			*Interest Rate:*
2025	4.85 - 11.00	2.30 - 5.50	*2025*
2024	5.35 - 11.25	2.30 - 6.00	*2024*

9. WESEL EKSPOR DAN TAGIHAN LAINNYA / *9. BILLS AND OTHER RECEIVABLES*

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025	2024	
Rupiah			***Rupiah***
Surat Keterangan Berdokumen Dalam Negeri (SKBDN)	3,914,620	3,018,683	*Domestic Documentary Letters of Credit*
Wesel Ekspor	66,941	245,084	*Export Bills*
Tagihan lainnya:			*Other receivables:*
- *Open account financing* dan *Supply chain financing*	5,036,723	6,687,195	*Open account financing and - Supply chain financing*
	9,018,284	9,950,962	
Mata uang asing			***Foreign currencies***
Wesel Ekspor	2,135,557	2,405,788	*Export Bills*
Surat Keterangan Berdokumen Dalam Negeri (SKBDN)	-	87,597	*Domestic Documentary Letters of Credit*
Tagihan lainnya:			*Other receivables:*
- *Open account financing* dan *Supply chain financing*	2,093,369	691,043	*Open account financing and - Supply chain financing*
- Tagihan transaksi *L/C Sight*	273,598	160,464	*L/C Sight receivables -*
	4,502,524	3,344,892	
Total	13,520,808	13,295,854	*Total*
Cadangan kerugian penurunan nilai	(67,962)	(52,828)	*Allowance for impairment losses*
	13,452,846	**13,243,026**	

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan) / *BILLS AND OTHER RECEIVABLES (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *By type and currency (continued)*

Perincian wesel ekspor dan tagihan lainnya berdasarkan mata uang adalah sebagai berikut:

Bills and other receivables based on currencies are as follows:

	2025	2024	
Rupiah	9,018,284	9,950,962	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	3,468,216	2,508,712	*United States Dollar*
Yuan China	1,034,308	835,837	*Chinese Yuan*
Euro Eropa	-	343	*European Euro*
	4,502,524	3,344,892	
Total	13,520,808	13,295,854	*Total*
Cadangan kerugian penurunan nilai	(67,962)	(52,828)	*Allowance for impairment losses*
	13,452,846	**13,243,026**	

b. Berdasarkan hubungan / *By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	4,621,912	6,121,139	*Rupiah*
Mata uang asing	717,025	87,597	*Foreign currencies*
Total pihak berelasi	5,338,937	6,208,736	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	4,396,372	3,829,823	*Rupiah*
Mata uang asing	3,785,499	3,257,295	*Foreign currencies*
Total pihak ketiga	8,181,871	7,087,118	*Total third parties*
Total	13,520,808	13,295,854	*Total*
Cadangan kerugian penurunan nilai	(67,962)	(52,828)	*Allowance for impairment losses*
	13,452,846	**13,243,026**	

c. Berdasarkan kolektibilitas sesuai Peraturan OJK / *By Financial Service Authority Rule collectibility*

Kolektibilitas wesel ekspor dan tagihan lainnya sesuai Peraturan OJK diungkapkan pada Catatan 61e.

Collectibility bills and other receivables in accordance with Financial Service Authority Rule are disclosed in Note 61e.

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

9. BILLS AND OTHER RECEIVABLES *(continued)*

d. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	13,214,501	81,353	-	13,295,854	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(24,079)	24,079	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	22,426	(22,426)	-	-	*Lifetime ECL not credit - -impaired*
Pengukuran kembali bersih*)	14,048,452	82,261	-	14,130,713	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	2,836,633	-	-	2,836,633	*New financial assets originated or purchased*
Pembayaran penuh	(16,908,446)	(44,856)	-	(16,953,302)	*Fully repayment*
Valuta asing dan perubahan lain	211,438	(528)	-	210,910	*Foreign exchange and other movements*
	13,400,925	**119,883**	**-**	**13,520,808**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	17,006,310	2,271,185	-	19,277,495	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(317,559)	317,559	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - tidak mengalami penurunan nilai	430,006	(430,006)	-	-	*Lifetime ECL not credit - -impaired*
Pengukuran kembali bersih*)	12,163,571	(74,679)	-	12,088,892	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,174,718	6,290	-	1,181,008	*New financial assets originated or purchased*
Pembayaran penuh	(17,513,406)	(2,017,860)	-	(19,531,266)	*Fully repayment*
Valuta asing dan perubahan lain	270,861	8,864	-	279,725	*Foreign exchange and other movements*
	13,214,501	**81,353**	**-**	**13,295,854**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

Including in the net remeasurement is repayment)*

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

9. BILLS AND OTHER RECEIVABLES *(continued)*

d. Gross carrying amount and allowance for impairment losses *(continued)*

Movements in the allowance for impairment losses are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivable***
Saldo awal	52,245	583	-	52,828	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(104)	104	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	101	(101)	-	-	*Lifetime ECL not credit - -impaired*
Pengukuran kembali bersih penyisihan kerugian	77,766	(16)	-	77,750	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	4,501	-	-	4,501	*New financial assets originated or purchased*
Pembayaran penuh	(77,987)	10,279	-	(67,708)	*Fully repayment*
Valuta asing dan perubahan lain	592	(1)	-	591	*Foreign exchange and other movements*
	57,114	**10,848**	**-**	**67,962**	

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Wesel ekspor dan tagihan lainnya					***Bill and other receivables***
Saldo awal	87,124	191,377	-	278,501	*Beginning balance*
Pengalihan dari					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(419)	419	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	2,230	(2,230)	-	-	*Lifetime ECL not credit - -impaired*
Pengukuran kembali bersih penyisihan kerugian	78,844	(165,188)	-	(86,344)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	3,314	63	-	3,377	*New financial assets originated or purchased*
Pembayaran penuh	(118,430)	(24,599)	-	(143,029)	*Fully repayment*
Valuta asing dan perubahan lain	(418)	741	-	323	*Foreign exchange and other movements*
	52,245	**583**	**-**	**52,828**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai diatas telah memadai.

Management believes that the above allowance for impairment losses is adequate.

9. WESEL EKSPOR DAN TAGIHAN LAINNYA (lanjutan) / *BILLS AND OTHER RECEIVABLES (continued)*

e. Tingkat suku bunga per tahun / *Annual interest rates*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Bunga kontrak			*Contractual rates*
2025	0.00 - 8.05	0.00 - 6.00	*2025*
2024	0.00 - 8.00	0.00 - 6.00	*2024*

10. TAGIHAN AKSEPTASI / *ACCEPTANCE RECEIVABLES*

a. Berdasarkan hubungan dan mata uang / *By relationship and currency*

	2025	2024	
Rupiah			***Rupiah***
Debitur non-bank	13,889,462	9,472,422	*Non-bank debtors*
Bank	347,663	107,089	*Banks*
	14,237,125	9,579,511	
Mata uang asing			***Foreign currencies***
Debitur non-bank	4,925,958	6,287,082	*Non-bank debtors*
Bank	419,663	152,177	*Banks*
	5,345,621	6,439,259	
Total	19,582,746	16,018,770	*Total*
Cadangan kerugian penurunan nilai	(133,986)	(93,249)	*Allowance for impairment losses*
	19,448,760	**15,925,521**	

Perincian tagihan akseptasi berdasarkan mata uang adalah sebagai berikut:

Acceptance receivables based on currencies are as follows:

	2025	2024	
Rupiah	14,237,125	9,579,511	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	4,824,647	5,982,789	*United States Dollar*
Pound Sterling Inggris	203,899	173,852	*Great Britain Pound Sterling*
Yuan China	201,933	213,509	*Chinese Yuan*
Euro Eropa	72,555	33,532	*European Euro*
Yen Jepang	41,983	35,577	*Japanese Yen*
Dolar Singapura	604	-	*Singapore Dollar*
	5,345,621	6,439,259	
Total	19,582,746	16,018,770	*Total*
Cadangan kerugian penurunan nilai	(133,986)	(93,249)	*Allowance for impairment losses*
	19,448,760	**15,925,521**	

10. TAGIHAN AKSEPTASI (lanjutan) / *10. ACCEPTANCE RECEIVABLES (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	5,662,771	2,046,948	*Rupiah*
Mata uang asing	391,056	778,312	*Foreign currencies*
Total pihak berelasi	6,053,827	2,825,260	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	8,574,354	7,532,563	*Rupiah*
Mata uang asing	4,954,565	5,660,947	*Foreign currencies*
Total pihak ketiga	13,528,919	13,193,510	*Total third parties*
Total	19,582,746	16,018,770	*Total*
Cadangan kerugian penurunan nilai	(133,986)	(93,249)	*Allowance for impairment losses*
	19,448,760	**15,925,521**	

c. Berdasarkan kolektibilitas sesuai Peraturan OJK / *c. By Financial Service Authority Rule collectibility*

Kolektibilitas tagihan akseptasi sesuai Peraturan OJK diungkapkan pada Catatan 61f.

Collectibility acceptance receivables in accordance with Financial Service Authority Rule are disclosed in Note 61f.

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai / *d. Gross carrying amount and allowance for impairment losses*

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	13,798,749	2,220,021	-	16,018,770	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(874,355)	874,355	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	47,756	(47,756)	-	-	*Lifetime ECL not credit impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(35,592)	35,592	-	*Transfer from/to Lifetime ECL credit - - impaired - net*
Pengukuran kembali bersih*)	21,822,799	524,809	(10,511)	22,337,097	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	2,964,998	86,162	-	3,051,160	*New financial assets originated or purchased*
Pembayaran penuh	(20,130,179)	(1,921,101)	(25,081)	(22,076,361)	*Full repayment*
Valuta asing dan perubahan lain	203,577	48,503	-	252,080	*Foreign exchange and other movements*
	17,833,345	**1,749,401**	**-**	**19,582,746**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

10. TAGIHAN AKSEPTASI (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

***10. ACCEPTANCE RECEIVABLES** (continued)*

***d. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the gross carrying amount are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	12,997,505	4,571,170	-	17,568,675	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(5,461,677)	5,461,677	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	9,678,270	(9,678,270)	-	-	*Lifetime ECL not credit impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	58,745	(58,745)	-	*Transfer from/to Lifetime ECL credit - - impaired - net*
Pengukuran kembali bersih*)	17,807,685	3,370,138	58,956	21,236,779	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	1,241,844	12,216	-	1,254,060	*New financial assets originated or purchased*
Pembayaran penuh	(22,630,027)	(1,711,097)	-	(24,341,124)	*Full repayment*
Valuta asing dan perubahan lain	165,149	135,442	(211)	300,380	*Foreign exchange and other movements*
	13,798,749	**2,220,021**	**-**	**16,018,770**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net remeasurement is repayment *)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	47,411	45,838	-	93,249	*Beginning balance*
Pengalihan dari:					*Transfer to:*
- Kerugian kredit ekspektasian 12 bulan	(2,084)	2,084	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	690	(690)	-	-	*Lifetime ECL not-credit impaired*
Pengalihan dari/ke Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	(3,428)	3,428	-	*Transfer from/to lifetime ECL credit-impaired*
Pengukuran kembali bersih penyisihan kerugian	65,757	225,019	1,637	292,413	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	12,754	35,610	-	48,364	*New financial assets originated or purchased*
Pembayaran penuh	(80,148)	(217,885)	(5,065)	(303,098)	*Full repayment*
Valuta asing dan perubahan lain	894	2,164	-	3,058	*Foreign exchange and other movements*
	45,274	**88,712**	**-**	**133,986**	

10. TAGIHAN AKSEPTASI (lanjutan)

d. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***10. ACCEPTANCE RECEIVABLES** (continued)*

***d. Gross carrying amount and allowance for impairment losses** (continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Tagihan akseptasi					***Acceptance receivables***
Saldo awal	41,549	435,932	-	477,481	*Beginning balance*
Pengalihan dari:					*Transfer to:*
- Kerugian kredit ekspektasian 12 bulan	(9,619)	9,619	-	-	*12-month ECL -*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	196,638	(196,638)	-	-	*Lifetime ECL not - credit impaired*
Pengalihan dari/ke Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	19,582	(19,582)	-	*Transfer from/to lifetime ECL credit-impaired*
Pengukuran kembali bersih penyisihan kerugian	(79,431)	41,658	19,658	(18,115)	*Net remeasurement of loss allowance*
Aset keuangan baru yang diterbitkan atau dibeli	5,076	1,220	-	6,296	*New financial assets originated or purchased*
Pembayaran penuh	(108,201)	(270,462)	-	(378,663)	*Fully repayment*
Valuta asing dan perubahan lain	1,399	4,927	(76)	6,250	*Foreign exchange and other movements*
	47,411	**45,838**	**-**	**93,249**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai diatas telah memadai.

Management believes that the above allowance for impairment losses is adequate.

e. Tingkat suku bunga per tahun

e. Annual interest rates

	Dolar Amerika Serikat/ *United States Dollar* %	
Suku Bunga:		*Interest Rate:*
2025	0.00 - 4.14	*2025*
2024	0.00 - 7.52	*2024*

11. TAGIHAN DAN LIABILITAS DERIVATIF

Dalam melakukan usaha bisnis, BNI melakukan transaksi instrumen keuangan derivatif seperti kontrak berjangka mata uang asing, *swap* mata uang asing, *swap* atas suku bunga dan transaksi *spot* untuk keperluan pembiayaan, perdagangan dan lindung nilai.

11. DERIVATIVE RECEIVABLES AND PAYABLES

In the normal course of business, BNI enters into transactions involving derivative financial instruments such as foreign currency forward contracts, currency swaps, interest rate swaps and spot transactions for financing, trading and hedging purposes.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025			
	Jumlah nosional mata uang asing (jumlah penuh)/ *Notional amount in foreign currency (full amount)*	Nilai wajar/*Fair values*		
Instrumen		**Tagihan derivatif/ *Derivative receivables***	**Liabilitas derivatif/ *Derivative payables***	***Instruments***
Terkait Nilai Tukar				***Exchange Rate Related***
Kontrak berjangka - beli				*Forward contract - buy*
CNY	83,714,862	3,410	(105)	*CNY*
JPY	800,000,000	-	(832)	*JPY*
USD	394,951,526	9,918	(29,501)	*USD*
Kontrak berjangka - jual				*Forward contract - sell*
EUR	1,000,000	92	-	*EUR*
USD	1,034,156,201	40,067	(4,284)	*USD*
Swap mata uang asing - beli				*Foreign currency swaps - buy*
EUR	22,500,000	738	(1,350)	*EUR*
JPY	44,081,288,940	56	(92,108)	*JPY*
USD	1,919,556,688	127,587	(79,099)	*USD*
Swap mata uang asing - jual				*Foreign currency swaps - sell*
AUD	15,000,000	757	-	*AUD*
EUR	80,945,142	1,076	(13,640)	*EUR*
GBP	24,000,000	1,303	(2,368)	*GBP*
SGD	9,465,462	-	(2,711)	*SGD*
USD	1,293,220,034	40,458	(53,289)	*USD*
Spot mata uang asing - beli				*Foreign currency spots - buy*
AUD	1,250,000	2	(45)	*AUD*
EUR	16,500,000	3	(446)	*EUR*
GBP	12,000,000	-	(1,086)	*GBP*
USD	309,900,000	398	(18,475)	*USD*
Spot mata uang asing - jual				*Foreign currency spots - sell*
EUR	23,000,000	100	(44)	*EUR*
GBP	2,000,000	75	(48)	*GBP*
USD	404,907,010	20,152	(1,148)	*USD*
OTC Option - beli				*OTC Option - buy*
USD	2,930,000,000	4,576,248	-	*USD*
OTC Option - jual				*OTC Option - sell*
USD	2,930,000,000	-	(4,636,529)	*USD*
Terkait Nilai Tukar dan Suku Bunga				***Exchange and Interest Rate Related***
Swap atas suku bunga				*Interest rate swap*
USD	372,310,055	99,752	(90,245)	*USD*
Swap mata uang asing dan suku bunga				*Cross currency swaps and interest rate*
USD	645,845,780	455,684	(348,614)	*USD*
Overnight Index Swap				*Overnight Index Swap*
IDR	100,000,000,000	52	(39)	*IDR*
USD	105,840,203	5,901	(3,529)	*USD*
Risk Free Rate				*Risk Free Rate*
IDR	1,000,000,000,000	15,576	(5,960)	*IDR*
USD	369,791,977	22,944	(13,404)	*USD*
		5,422,349	**(5,398,899)**	

11. TAGIHAN DAN LIABILITAS DERIVATIF (lanjutan) / *11. DERIVATIVE RECEIVABLES AND PAYABLES (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

Instrumen	2024 Jumlah nosional mata uang asing (jumlah penuh)/ *Notional amount in foreign currency (full amount)*	2024 Nilai wajar/*Fair values* Tagihan derivatif/ *Derivative receivables*	2024 Nilai wajar/*Fair values* Liabilitas derivatif/ *Derivative payables*	*Instruments*
Terkait Nilai Tukar				***Exchange Rate Related***
Kontrak berjangka - beli				*Forward contract - buy*
AUD	1,000,000	-	(727)	*AUD*
CNY	490,150,583	5,156	(4,938)	*CNY*
USD	619,063,138	145,043	(16,782)	*USD*
Kontrak berjangka - jual				*Forward contract - sell*
USD	709,039,849	35,034	(114,357)	USD
Swap mata uang asing - beli				*Foreign currency swaps - buy*
EUR	7,000,000	-	(1,565)	*EUR*
GBP	2,500,000	-	(828)	*GBP*
JPY	35,963,593,684	5,170	(74,125)	*JPY*
SGD	43,000,000	-	(1,599)	*SGD*
USD	1,720,986,416	423,786	(55,650)	*USD*
Swap mata uang asing - jual				*Foreign currency swaps - sell*
AUD	200,000	68	-	*AUD*
EUR	118,766,365	43,757	(1,458)	*EUR*
GBP	20,500,000	5,724	(401)	*GBP*
NZD	7,000,000	117	-	*NZD*
SGD	57,890,550	1,953	(6,592)	*SGD*
USD	1,454,456,761	41,171	(256,972)	*USD*
Spot mata uang asing - beli				*Foreign currency spots - buy*
AUD	461,560	3	(5)	*AUD*
EUR	6,550,000	16	(117)	*EUR*
GBP	2,100,000	-	(47)	*GBP*
USD	233,043,126	218	(13,280)	*USD*
Spot mata uang asing - jual				*Foreign currency spots - sell*
AUD	8,000,000	41	(160)	*AUD*
CNY	90,000,000	1,484	-	*CNY*
EUR	1,402,632	5	(7)	*EUR*
GBP	97,000	1	-	*GBP*
USD	361,110,000	12,705	(394)	*USD*
OTC Option - beli				*OTC Option - buy*
USD	2,490,000,000	362,558	(73,145)	*USD*
OTC Option - jual				*OTC Option - sell*
USD	2,490,000,000	106,802	(362,141)	*USD*
Terkait Nilai Tukar dan Suku Bunga				***Exchange and Interest Rate Related***
Swap atas suku bunga				*Interest rate swap*
USD	530,138,055	167,815	(139,124)	*USD*
Swap mata uang asing dan suku bunga				*Cross currency swaps and interest rate*
USD	758,826,078	340,969	(243,174)	*USD*
Risk Free Rate				*Risk Free Rate*
IDR	1,000,000,000,000	22,306	(16,153)	*IDR*
USD	672,791,977	71,076	(95,444)	*USD*
		1,792,978	**(1,479,185)**	

11. TAGIHAN DAN LIABILITAS DERIVATIF (lanjutan) / *11. DERIVATIVE RECEIVABLES AND PAYABLES (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Tagihan derivatif			***Derivatives receivables***
Pihak berelasi			***Related parties***
Mata uang asing	768,083	341,832	*Foreign currencies*
Total pihak berelasi	768,083	341,832	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	15,628	22,306	*Rupiah*
Mata uang asing	4,638,638	1,428,840	*Foreign currencies*
Total pihak ketiga	4,654,266	1,451,146	*Total third parties*
Total	**5,422,349**	**1,792,978**	***Total***
Liabilitas derivatif			***Derivatives payables***
Pihak berelasi			***Related parties***
Rupiah	(2)	-	*Rupiah*
Mata uang asing	(977,117)	(154,840)	*Foreign currencies*
Total pihak berelasi	(977,119)	(154,840)	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	(5,997)	(16,153)	*Rupiah*
Mata uang asing	(4,415,783)	(1,308,192)	*Foreign currencies*
Total pihak ketiga	(4,421,780)	(1,324,345)	*Total third parties*
Total	**(5,398,899)**	**(1,479,185)**	***Total***

Kolektibilitas tagihan derivatif sesuai Peraturan OJK diungkapkan pada Catatan 61g.

Derivative receivable in accordance with Financial Service Authority Rule are disclosed in Note 61g.

12. PINJAMAN YANG DIBERIKAN / *12. LOANS*

Informasi mengenai pinjaman yang diberikan kepada pihak-pihak berelasi diungkapkan pada Catatan 46j.

Information related to loans to related parties are disclosed in Note 46j.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025	2024	
Rupiah			***Rupiah***
Modal kerja	394,001,511	313,931,090	*Working capital*
Konsumen	158,034,753	144,437,589	*Consumer*
Investasi	136,594,295	98,811,980	*Investment*
Sindikasi	51,257,005	51,506,578	*Syndicated*
Karyawan	2,405,602	2,893,682	*Employee*
Program pemerintah	2,302	2,652	*Government programs*
	742,295,468	611,583,571	
Mata uang asing			***Foreign currencies***
Modal kerja	79,952,125	85,839,485	*Working capital*
Sindikasi	46,340,215	45,614,532	*Syndicated*
Investasi	30,924,643	32,810,919	*Investment*
Konsumen	18,079	22,682	*Consumer*
Karyawan	161	589	*Employee*
	157,235,223	164,288,207	
Total	899,530,691	775,871,778	*Total*
Cadangan kerugian penurunan nilai	(35,860,626)	(38,684,520)	*Allowance for impairment losses*
	863,670,065	**737,187,258**	

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *12. LOANS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

Perincian pinjaman yang diberikan berdasarkan mata uang adalah sebagai berikut:

Loans based on currencies are as follows:

	2025	2024	
Rupiah	742,295,468	611,583,571	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	150,680,439	158,597,057	*United States Dollar*
Euro Eropa	2,668,966	2,198,860	*European Euro*
Yen Jepang	1,457,017	1,184,519	*Japanese Yen*
Dolar Singapura	1,122,092	1,041,007	*Singapore Dollar*
Dolar Australia	814,535	791,438	*Australian Dollar*
Won Korea Selatan	405,069	327,873	*South Korean Won*
Dolar Hong Kong	87,105	120,419	*Hong Kong Dollar*
Pound Sterling Inggris	-	12,541	*Great Britain Pound Sterling*
Yuan China	-	14,493	*Chinese Yuan*
	157,235,223	164,288,207	
Total	899,530,691	775,871,778	*Total*
Cadangan kerugian penurunan nilai	(35,860,626)	(38,684,520)	*Allowance for impairment losses*
	863,670,065	**737,187,258**	

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Modal kerja	139,363,077	75,643,457	*Working capital*
Sindikasi	34,339,794	30,425,373	*Syndicated*
Investasi	19,681,153	11,427,719	*Investment*
Karyawan	214,523	190,526	*Employee*
Konsumen	81,627	68,632	*Consumer*
	193,680,174	117,755,707	
Mata uang asing			***Foreign currencies***
Modal kerja	30,573,822	28,408,879	*Working capital*
Investasi	12,219,093	9,367,350	*Investment*
Sindikasi	2,543,712	3,870,753	*Syndicated*
	45,336,627	41,646,982	
Total pihak berelasi	239,016,801	159,402,689	*Total related parties*

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *12. LOANS (continued)*

b. Berdasarkan hubungan (lanjutan) / *b. By relationship (continued)*

	2025	2024	
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Modal kerja	254,638,434	238,287,633	*Working capital*
Konsumen	157,953,126	144,368,957	*Consumer*
Investasi	116,913,142	87,384,261	*Investment*
Sindikasi	16,917,211	21,081,205	*Syndicated*
Karyawan	2,191,079	2,703,156	*Employee*
Program pemerintah	2,302	2,652	*Government programs*
	548,615,294	493,827,864	
Mata uang asing			***Foreign currencies***
Modal kerja	49,378,303	57,430,606	*Working capital*
Sindikasi	43,796,503	41,743,779	*Syndicated*
Investasi	18,705,550	23,443,569	*Investment*
Konsumen	18,079	22,682	*Consumer*
Karyawan	161	589	*Employee*
	111,898,596	122,641,225	
Total pihak ketiga	660,513,890	616,469,089	*Total third parties*
Total	899,530,691	775,871,778	*Total*
Cadangan kerugian penurunan nilai	(35,860,626)	(38,684,520)	*Allowance for impairment losses*
	863,670,065	**737,187,258**	

c. Berdasarkan sektor ekonomi / *c. By economic sector*

	2025	2024	
Rupiah			***Rupiah***
Perdagangan, restoran dan hotel	128,565,347	117,511,041	*Trading, restaurants and hotels*
Konstruksi	117,960,229	59,281,490	*Construction*
Perindustrian	88,251,670	93,334,411	*Manufacturing*
Jasa dunia usaha	62,075,755	48,625,301	*Business services*
Pengangkutan, pergudangan dan komunikasi	52,446,301	45,678,272	*Transportation, warehousing and communications*
Pertanian	48,127,303	46,121,348	*Agriculture*
Pertambangan	41,931,166	22,417,498	*Mining*
Listrik, gas dan air	26,028,704	13,377,490	*Electricity, gas and water*
Jasa pelayanan sosial	16,412,568	17,902,796	*Social services*
Lain-lain	160,496,425	147,333,924	*Others*
	742,295,468	611,583,571	

12. PINJAMAN YANG DIBERIKAN (lanjutan) / *12. LOANS (continued)*

c. Berdasarkan sektor ekonomi (lanjutan) / *c. By economic sector (continued)*

	2025	2024	
Mata uang asing			***Foreign currencies***
Perindustrian	57,312,574	66,246,233	*Manufacturing*
Jasa pelayanan sosial	31,223,784	22,837,062	*Social services*
Pertambangan	23,909,171	29,242,696	*Mining*
Listrik, gas dan air	18,979,110	18,265,799	*Electricity, gas and water*
Pengangkutan, pergudangan dan komunikasi	11,483,542	12,146,246	*Transportation, warehousing and communications*
Perdagangan, restoran dan hotel	8,552,371	7,900,500	*Trading, restaurants and hotels*
Jasa dunia usaha	3,283,075	3,697,706	*Business services*
Pertanian	2,167,173	2,768,670	*Agriculture*
Konstruksi	306,183	1,160,025	*Construction*
Lain-lain	18,240	23,270	*Others*
	157,235,223	164,288,207	
Total	899,530,691	775,871,778	*Total*
Cadangan kerugian penurunan nilai	(35,860,626)	(38,684,520)	*Allowance for impairment losses*
	863,670,065	**737,187,258**	

d. Berdasarkan penilaian secara kolektif dan individual / *d. By assessment as collective and individual*

	2025	2024	
Pokok			***Principal***
Individual	70,279,823	65,606,421	*Individual*
Kolektif	829,250,868	710,265,357	*Collective*
	899,530,691	775,871,778	
Cadangan kerugian penurunan nilai			***Allowance for impairment losses***
Individual	(24,282,998)	(28,721,822)	*Individual*
Kolektif	(11,577,628)	(9,962,698)	*Collective*
	(35,860,626)	(38,684,520)	
	863,670,065	**737,187,258**	

e. Berdasarkan kolektibilitas sesuai Peraturan OJK / *e. By Financial Service Authority Rule collectibility*

Kolektabilitas pinjaman sesuai dengan peraturan OJK diungkapkan pada Catatan 61h.

Collectibility loans in accordance with the OJK regulation are disclosed in Note 61h.

12. PINJAMAN YANG DIBERIKAN (lanjutan)

***12. LOANS** (continued)*

f. Pinjaman bermasalah dan cadangan kerugian penurunan nilai berdasarkan sektor ekonomi

Rasio kredit bermasalah BNI dan Entitas Anak sesuai dengan peraturan OJK diungkapkan pada Catatan 61h.

f. Non-performing loans and allowance for impairment losses by economic sector

The non-performing loans ratio of BNI and Subsidiaries in accordance with the OJK regulation are disclosed in Note 61h.

g. Tingkat suku bunga per tahun

g. Annual interest rates

	Rupiah*) %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	Dolar Australia/ *Australian Dollar* %	
Bunga kontrak											*Contractual rates*
2025	0.00 - 22.50	0.00 - 11.25	3.20 - 7.00	0.41 - 4.23	3.27 - 4.00	3.88 - 6.00	-	-	1.50 - 7.55	5.94 - 7.00	*2025*
2024	0.00 - 22.45	0.00 - 10.22	3.90 - 7.00	0.41 - 3.88	4.00 - 7.25	4.35 - 6.00	6.25	7.60 - 7.70	1.50 - 8.56	6.71 - 7.00	*2024*
Bunga efektif											*Effective interest rate*
2025	0.00 - 29.90	0.10 - 10.00	3.20 - 7.00	0.41 - 4.23	3.27 - 4.00	3.88 - 6.00	-	-	1.50 - 7.55	5.94 - 7.00	*2025*
2024	0.00 - 29.90	0.10 - 10.22	3.90 - 7.00	0.41 - 3.88	4.00 - 7.36	4.35 - 6.00	6.25	7.60 - 7.00	1.50 - 8.56	6.71 - 7.00	*2024*

*) Tidak termasuk dalam tingkat suku bunga kontrak dan suku bunga efektif diatas adalah suku bunga dari transaksi *Paylater* untuk tanggal 31 Desember 2025 dan 2024 masing-masing sebesar dan 18,96% - 51,48%.

*) *Not included in the contractual interest rates and effective interest rate above are the interest rate from Paylater transactions as of 31 December 2025 and 2024, were and 18.96% - 51.48%, respectively.*

h. Pinjaman yang direstrukturisasi

Berikut ini adalah jenis dan jumlah kredit yang telah direstrukturisasi per 31 Desember 2025 dan 2024:

h. Restructured loans

Below are the types and amounts of restructured loans as of 31 December 2025 and 2024:

	2025	2024	
Perpanjangan jangka waktu	26,400,100	24,753,697	*Extension of loan maturity dates*
Penurunan suku bunga kredit	25,159,468	25,710,415	*Reduction of interest rates*
Lainnya*)	10,444,193	16,294,208	*Others**)
	62,003,761	**66,758,320**	

*) Program restrukturisasi lain-lain terutama terdiri dari penambahan fasilitas kredit, Perjanjian Penyelesaian Hutang (PPH) dan *Interest Balloon Payments (IBP)*.

*) *Other restructuring schemes mainly includes additions of loan facilities, debt settlement agreements (PPH) and Interest Balloon Payments (IBP).*

Pinjaman yang direstrukturisasi sesuai dengan peraturan OJK diungkapkan pada Catatan 61h.

Restructured loans in accordance with the OJK regulation are disclosed in Note 61h.

12. PINJAMAN YANG DIBERIKAN (lanjutan)

i. Pinjaman sindikasi

Pinjaman sindikasi merupakan pinjaman yang diberikan kepada debitur berdasarkan perjanjian pembiayaan bersama dengan bank-bank lain.

Keikutsertaan Grup dalam pinjaman sindikasi dengan bank-bank lain adalah sebesar Rp97.597.220 dan Rp97.121.110 masing-masing pada tanggal 31 Desember 2025 dan 2024.

Persentase bagian BNI dalam pinjaman sindikasi, dimana BNI bertindak sebagai pimpinan sindikasi adalah sebagai berikut:

	2025	2024	
% Partisipasi	5.04% - 100.00%	5.04% - 100.00%	*% Participation*

Keikutsertaan BNI dalam pinjaman sindikasi, dimana BNI bertindak sebagai anggota sindikasi adalah sebagai berikut:

	2025	2024	
% Partisipasi	0.22% - 50.00%	0.13% - 50.00%	*% Participation*

***12. LOANS** (continued)*

i. Syndicated loans

Syndicated loans represent loans provided to debtors based on syndication agreements with other banks.

Group participation in syndicated loans with other banks amounted to Rp97,597,220 and Rp97,121,110 as of 31 December 2025 and 2024, respectively.

BNI's percentage shares in syndicated loans, in which BNI acts as the lead arranger, is as follows:

BNI's participation in syndicated loans, in which BNI acts as the syndication member, is as follows:

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai

Perubahan nilai tercatat bruto adalah sebagai berikut:

j. Gross carrying amount and allowance for impairment losses

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Pinjaman yang diberikan					***Loans***
Saldo awal	690,710,305	59,215,028	25,946,445	775,871,778	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(48,055,480)	48,055,480	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian Sepanjang umurnya - kredit tidak memburuk	23,480,492	(23,480,492)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	182,223	(16,539,776)	16,357,553	-	*Transfer from/to lifetime ECL credit impaired - net*
Pengukuran kembali bersih*)	(164,760,021)	(10,338,048)	(718,501)	(175,816,570)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	483,653,212	11,353,713	396,110	495,403,035	*New financial assets originated or purchased*
Pembayaran penuh	(181,048,386)	(4,527,162)	(592,203)	(186,167,751)	*Full repayment*
Penghapusbukuan	(8,400)	(87,046)	(15,498,347)	(15,593,793)	*Write-offs*
Valuta asing dan perubahan lain	3,996,347	1,654,569	183,076	5,833,992	*Foreign exchange and other movements*
	808,150,291	**65,306,268**	**26,074,132**	**899,530,691**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

12. PINJAMAN YANG DIBERIKAN (lanjutan)

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

***12. LOANS** (continued)*

***j. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the gross carrying amount are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Pinjaman yang diberikan					***Loans***
Saldo awal	592,250,284	71,267,952	31,566,533	695,084,769	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(46,089,808)	46,089,808	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian Sepanjang umurnya - kredit tidak memburuk	44,881,133	(44,881,133)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	(314,609)	(15,033,813)	15,348,422	-	*Transfer from/to lifetime ECL credit impaired - net*
Pengukuran kembali bersih*)	(111,065,027)	(16,255,626)	(2,016,400)	(129,337,053)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	391,171,138	22,311,172	273,118	413,755,428	*New financial assets originated or purchased*
Pembayaran penuh	(184,273,357)	(5,396,143)	(661,663)	(190,331,163)	*Full repayment*
Penghapusbukuan	(2,939)	(109,376)	(18,611,521)	(18,723,836)	*Write-offs*
Valuta asing dan perubahan lain	4,153,490	1,222,187	47,956	5,423,633	*Foreign exchange and other movements*
	690,710,305	**59,215,028**	**25,946,445**	**775,871,778**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net remeasurement is repayment *)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Pinjaman yang diberikan					***Loans***
Saldo awal	4,131,171	16,724,898	17,828,451	38,684,520	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,519,363)	1,519,363	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	3,141,001	(3,141,001)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	255,326	(4,876,927)	4,621,601	-	*Transfer from/to: Lifetime ECL credit-impaired -*
Pengukuran kembali bersih penyisihan kerugian*)	(1,833,123)	4,456,068	9,566,470	12,189,415	*Net remeasurement of loss allowance*)*
Aset keuangan baru yang diterbitkan atau dibeli	1,746,786	1,829,676	139,530	3,715,992	*New financial assets originated or purchased*
Pembayaran penuh	(1,936,718)	(1,360,223)	(91,059)	(3,388,000)	*Full repayment*
Penghapusbukuan	(8,400)	(87,046)	(15,498,347)	(15,593,793)	*Write-offs*
Valuta asing dan perubahan lain	(58,020)	169,346	141,166	252,492	*Foreign exchange and other movements*
	3,918,660	**15,234,154**	**16,707,812**	**35,860,626**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian, adalah pembayaran kembali.

*Including in the net remeasurement of loss allowance is repayment *)*

12. PINJAMAN YANG DIBERIKAN (lanjutan)

j. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***12. LOANS** (continued)*

***j. Gross carrying amount and allowance for impairment losses** (continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Pinjaman yang diberikan					***Loans***
Saldo awal	4,116,856	19,078,523	23,962,752	47,158,131	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,388,026)	1,388,026	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	2,776,280	(2,776,280)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	308,386	(5,022,780)	4,714,394	-	*Transfer from/to: Lifetime ECL credit-impaired -*
Pengukuran kembali bersih penyisihan kerugian*)	(1,792,074)	(2,015,723)	7,990,276	4,182,479	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	1,651,317	7,921,581	118,669	9,691,567	*New financial assets originated or purchased*
Pembayaran penuh	(1,554,149)	(1,955,047)	(616,441)	(4,125,637)	*Full repayment*
Penghapusbukuan	(2,939)	(109,376)	(18,611,521)	(18,723,836)	*Write-offs*
Valuta asing dan perubahan lain	15,520	215,974	270,322	501,816	*Foreign exchange and other movements*
	4,131,171	**16,724,898**	**17,828,451**	**38,684,520**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian, adalah pembayaran kembali.

*Including in the net remeasurement of loss allowance is repayment *)*

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses above is adequate.

k. Kredit dihapusbukukan

Kredit yang telah dihapusbukukan oleh BNI dicatat sebagai kredit ekstra-komtabel di dalam rekening administratif.

k. Loans written off

The loans written off by BNI are recorded as extra-comptable in the administrative account.

l. Fasilitas pembiayaan dengan perusahaan pembiayaan

BNI memiliki perjanjian pembiayaan dengan beberapa lembaga pembiayaan untuk membiayai kepemilikan kendaraan bermotor sebesar Rp2.851.613 dan Rp2.729.935 masing-masing pada tanggal 31 Desember 2025 dan 2024.

l. Financing arrangements with multi-finance companies

BNI has financing arrangements with several multi-finance companies with respect to motor vehicles financing amounting to Rp2,851,613 and Rp2,729,935 as of 31 December 2025 and 2024, respectively.

12. PINJAMAN YANG DIBERIKAN (lanjutan)

m. Informasi pokok lainnya sehubungan dengan pinjaman yang diberikan

Grup memiliki agunan atas pinjaman yang diberikan dalam bentuk kas, deposito, agunan yang diikat dengan hipotek, garansi serta jaminan dalam bentuk aset lainnya.

Pinjaman karyawan adalah pinjaman yang diberikan kepada karyawan dengan tingkat bunga sebesar 3% - 5% per tahun yang ditujukan untuk pembelian rumah dan keperluan lainnya dengan jangka waktu berkisar antara 1 tahun sampai 20 tahun. Pembayaran pokok pinjaman dan bunga dilunasi melalui pemotongan gaji setiap bulan.

Informasi pokok lainnya terkait pelampauan Batas Maksimum Pemberian Kredit Bank sesuai dengan peraturan yang ditetapkan OJK diungkapkan pada Catatan 61h.

12. LOANS (continued)

m. Other significant information relating to loans

The Group holds collateral against loans in the form of cash, deposits, registered mortgages, guarantees and other assets held as collaterals.

Loans to employees which carried interest rate of 3% - 5% per annum are intended for purchase of houses and other necessities with 1 year to 20 years period. The loan principal and interest payments are settled through monthly payroll deductions.

Other significant information such as any breach nor violation of Legal Lending Limit as required by Regulation of Financial Services Authority are disclosed in Note 61h.

13. OBLIGASI PEMERINTAH

Informasi mengenai Obligasi Pemerintah berdasarkan pihak yang berelasi diungkapkan pada Catatan 46f.

13. GOVERNMENT BONDS

Information related to Government Bonds to related parties are disclosed in Note 46f.

a. Berdasarkan jenis dan mata uang

a. By type and currency

	2025		2024		
	Nilai Nominal/ *Nominal Value*	Nilai Tercatat/ *Carrying Value*	Nilai Nominal/ *Nominal Value*	Nilai Tercatat/ *Carrying Value*	
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Rupiah					***Rupiah***
Tingkat bunga tetap	5,332,718	5,455,065	3,844,241	3,858,064	*Fixed rate*
Mata uang asing					***Foreign currencies***
Tingkat bunga tetap	142,655	139,233	109,687	99,009	*Fixed rate*
Total nilai wajar melalui laba rugi	**5,475,373**	**5,594,298**	**3,953,928**	**3,957,073**	***Total fair value through profit or loss***
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Rupiah					***Rupiah***
Tingkat bunga tetap	99,426,354	103,651,077	71,468,504	71,351,417	*Fixed rate*
Tingkat bunga mengambang	-	-	100,000	99,959	*Floating rate*
	99,426,354	103,651,077	71,568,504	71,451,376	
Mata uang asing					***Foreign currencies***
Tingkat bunga tetap	19,985,243	19,386,380	20,600,172	19,453,065	*Fixed rate*
Total nilai wajar melalui penghasilan komprehensif lain	**119,411,597**	**123,037,457**	**92,168,676**	**90,904,441**	***Total fair value through other comprehensive income***

13. OBLIGASI PEMERINTAH (lanjutan) / *13. GOVERNMENT BONDS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

	2025		2024		
	Nilai Nominal/ *Nominal Value*	Nilai Tercatat/ *Carrying Value*	Nilai Nominal/ *Nominal Value*	Nilai Tercatat/ *Carrying Value*	
Biaya perolehan diamortisasi					***Amortised cost***
Rupiah					***Rupiah***
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi, sebesar Rp180.016 per 31 Desember 2025 dan Rp178.662 per 31 Desember 2024	22,386,455	22,566,471	23,749,156	23,927,818	*Fixed rate, net of unamortised discount/premium of Rp180,016 as of 31 December 2025 and Rp178,662 as of 31 December 2024*
Mata uang asing					***Foreign currencies***
Tingkat bunga tetap, setelah diskonto/premi yang belum diamortisasi sebesar Rp22.903 per 31 Desember 2025 dan Rp46.836 per 31 Desember 2024	12,291,772	12,314,675	13,235,401	13,282,237	*Fixed rate, net of unamortised discount/ premium of Rp22,903 as of 31 December 2025 and Rp46,836 as of 31 December 2024*
Total biaya perolehan diamortisasi	**34,678,227**	**34,881,146**	**36,984,557**	**37,210,055**	***Total amortised cost***
Total Obligasi Pemerintah		**163,512,901**		**132,071,569**	***Total Government Bonds***
Cadangan kerugian penurunan nilai		(2,475)		(2,988)	*Allowance for impairment losses*
Obligasi Pemerintah - bersih		**163,510,426**		**132,068,581**	***Government Bonds – net***

Jumlah nominal Obligasi Pemerintah yang diterima BNI dari program rekapitalisasi masing-masing sebesar Rpnihil dan Rp100.000 pada tanggal 31 Desember 2025 dan 2024.

The total outstanding nominal amount of Government Bonds received by BNI from the recapitalization program amounted to Rpnil and Rp100,000 as of 31 December 2025 and 2024, respectively.

Jumlah Obligasi Pemerintah yang dikelompokkan sebagai nilai wajar melalui penghasilan komprehensif lain yang dijual selama tahun berjalan adalah sebagai berikut:

The total Government Bonds at fair value through other comprehensive income sold during the current year are as follows:

	Total dijual/ *Sold*	Kepada pihak ketiga/ *To third parties*		
	Nilai nominal/ *Nominal value*	Nilai nominal/ *Nominal value*	Harga jual/ *Selling price*	
2025	9,983,648	6,318,648	6,704,231	*2025*
2024	7,115,934	4,758,601	4,776,476	*2024*

Jumlah nilai nominal Obligasi Pemerintah yang telah jatuh tempo pada 31 Desember 2025 dan 2024 masing-masing adalah sebesar Rp9.593.465 dan Rp14.123.726.

Total nominal amount of Government Bonds which have matured amounted to Rp9,593,465 and Rp14,123,726 as of 31 December 2025 and 2024, respectively.

Untuk tingkat bunga tetap, harga pasar Obligasi Pemerintah berkisar antara 64,68% sampai dengan 134,19% dan antara 54,49% sampai dengan 129,31% masing-masing pada tanggal 31 Desember 2025 dan 2024.

For fixed interest rate bonds, the market price of Government Bonds ranged from 64.68% to 134.19% and from 54.49% to 129.31% as of 31 December 2025 and 2024, respectively.

Untuk obligasi tingkat bunga mengambang, harga pasar Obligasi Pemerintah adalah 99,96% pada tanggal 31 Desember 2024 dari nilai nominal.

For floating interest rate bonds, the market price of Government Bonds is 99.96% as of 31 December 2024 of the nominal amounts.

13. OBLIGASI PEMERINTAH (lanjutan) / *13. GOVERNMENT BONDS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

BNI mengakui adanya keuntungan atau kerugian yang belum direalisasi atas perubahan nilai pasar Obligasi Pemerintah dalam kelompok nilai wajar melalui penghasilan komprehensif lain (bersih setelah pajak) sebesar Rp4.403.307 (laba) dan Rp715.380 (laba) masing-masing tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 yang dicatat pada bagian ekuitas laporan posisi keuangan konsolidasian.

BNI recognised the unrealised gains or losses from the changes in the market value of the Government Bonds categorised as fair value through other comprehensive income (net of taxes) in the amount of Rp4,403,307 (gain) and Rp715,380 (gain) for the year ended 31 December 2025 and 2024, respectively, both recorded in the equity section of the consolidated statement of financial position.

Pada 31 Desember 2025 dan 2024, Obligasi Pemerintah dengan tingkat bunga tetap dengan jumlah nominal Rp7.473.901 dan Rp16.769.460 telah dijual dengan janji dibeli kembali hingga jatuh tempo (lihat Catatan 24).

As of 31 December 2025 and 2024, the fixed rate Government Bonds have been sold under agreements to repurchase at maturity with nominal amount of Rp7,473,901 and Rp16,769,460, respectively (refer to Note 24).

b. Berdasarkan kisaran tanggal jatuh tempo dan jenis bunga / *b. Based on maturity date and type of interest rate*

	2025	
Nilai wajar melalui laba rugi		*Fair value through profit of loss*
Obligasi tingkat bunga tetap	02/01/2026 - 12/03/2071	*Fixed rate bonds*
Nilai wajar melalui penghasilan komprehensif lain		*Fair value through other comprehensive income*
Obligasi tingkat bunga tetap	08/01/2026 - 15/07/2064	*Fixed rate bonds*
Biaya perolehan diamortisasi		*Amortised cost*
Obligasi tingkat bunga tetap	08/01/2026 - 15/07/2054	*Fixed rate bonds*

	2024	
Nilai wajar melalui laba rugi		*Fair value through profit of loss*
Obligasi tingkat bunga tetap	03/01/2025 - 12/03/2071	*Fixed rate bonds*
Nilai wajar melalui penghasilan komprehensif lain		*Fair value through other comprehensive income*
Obligasi tingkat bunga tetap	10/01/2025 - 15/07/2064	*Fixed rate bonds*
Obligasi tingkat bunga mengambang	25/04/2025	*Floating rate bonds*
Biaya perolehan diamortisasi		*Amortised cost*
Obligasi tingkat bunga tetap	10/01/2025 - 15/07/2054	*Fixed rate bonds*

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai / *c. Gross carrying amount and allowance for impairment losses*

Perubahan nilai tercatat bruto adalah sebagai berikut:

Movements in the gross carrying amount are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Obligasi Pemerintah yang diukur pada biaya perolehan diamortisasi					***Government Bonds at amortised cost***
Saldo awal	37,210,055	-	-	37,210,055	*Beginning balance*
Pengukuran kembali bersih	(3,883,061)	-	-	(3,883,061)	*Net remeasurement*
Aset keuangan baru yang diterbitkan atau dibeli	1,116,071	-	-	1,116,071	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	438,081	-	-	438,081	*Foreign exchange and other movements*
	34,881,146	**-**	**-**	**34,881,146**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

13. GOVERNMENT BONDS *(continued)*

c. Gross carrying amount and allowance for impairment losses *(continued)*

Movements in the gross carrying amount are as follows: (continued)

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bonds at fair value through other comprehensive income***
Saldo awal	90,904,441	-	-	90,904,441	*Beginning balance*
Pengukuran kembali bersih*)	(77,727,852)	-	-	(77,727,852)	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	109,827,911	-	-	109,827,911	*New financial assets originated or purchased*
Pembayaran penuh	(753,997)	-	-	(753,997)	*Fully repayment*
Valuta asing dan perubahan lain	786,954	-	-	786,954	*Foreign exchange and other movements*
	123,037,457	**-**	**-**	**123,037,457**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan Obligasi Pemerintah

Including in the net measurement is sales of Government Bonds)*

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada biaya perolehan diamortisasi					***Government Bonds at amortised cost***
Saldo awal	36,363,265	-	-	36,363,265	*Beginning balance*
Pengukuran kembali bersih	(291,317)	-	-	(291,317)	*Net remeasurement*
Aset keuangan baru yang diterbitkan atau dibeli	585,596	-	-	585,596	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	552,511	-	-	552,511	*Foreign exchange and other movements*
	37,210,055	**-**	**-**	**37,210,055**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan nilai tercatat bruto adalah sebagai berikut: (lanjutan)

***13. GOVERNMENT BONDS** (continued)*

***c. Gross carrying amount and allowance for impairment losses** (continued)*

Movements in the gross carrying amount are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bonds at fair value through other comprehensive income***
Saldo awal	86,549,332	-	-	86,549,332	*Beginning balance*
Pengukuran kembali bersih*)	(14,720,011)	-	-	(14,720,011)	*Net remeasurement*)*
Aset keuangan baru yang diterbitkan atau dibeli	18,666,108	-	-	18,666,108	*New financial assets originated or purchased*
Pembayaran penuh	(429,531)	-	-	(429,531)	*Fully repayment*
Valuta asing dan perubahan lain	838,543	-	-	838,543	*Foreign exchange and other movements*
	90,904,441	**-**	**-**	**90,904,441**	

*) Termasuk di dalam pengukuran kembali bersih adalah penjualan Obligasi Pemerintah

Including in the net measurement is sales of Government Bonds)*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada biaya biaya perolehan diamortisasi					***Government Bonds at amortised cost***
Saldo awal	2,988	-	-	2,988	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(971)	-	-	(971)	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	355	-	-	355	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	103	-	-	103	*Foreign exchange and other movements*
	2,475	**-**	**-**	**2,475**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***13. GOVERNMENT BONDS** (continued)*

***c. Gross carrying amount and allowance for impairment losses** (continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total*[*)]**	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bonds at fair value through other comprehensive income***
Saldo awal	4,253	-	-	4,253	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	(984)	-	-	(984)	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	635	-	-	635	*New financial assets originated or purchased*
Pembayaran penuh	-	-	-	-	*Fully repayment*
Valuta asing dan perubahan lain	151	-	-	151	*Foreign exchange and other movements*
	4,055	**-**	**-**	**4,055**	

[*)] Cadangan kerugian penurunan nilai pada Obligasi Pemerintah dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

[*)] *Allowance for impairment losses on Government Bonds classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Obligasi Pemerintah yang diukur pada biaya biaya perolehan diamortisasi					***Government Bonds at amortised cost***
Saldo awal	1,504	-	-	1,504	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	1,287	-	-	1,287	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	96	-	-	96	*New financial assets originated or purchased*
Valuta asing dan perubahan lain	101	-	-	101	*Foreign exchange and other movements*
	2,988	**-**	**-**	**2,988**	

13. OBLIGASI PEMERINTAH (lanjutan)

c. Nilai tercatat bruto dan cadangan kerugian penurunan nilai (lanjutan)

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut: (lanjutan)

***13. GOVERNMENT BONDS** (continued)*

***c. Gross carrying amount and allowance for impairment losses** (continued)*

The movements in the allowance for impairment losses are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total*[*)]**	
Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain					***Government Bonds at fair value through other comprehensive income***
Saldo awal	1,980	-	-	1,980	*Beginning balance*
Pengukuran kembali bersih penyisihan kerugian	2,048	-	-	2,048	*Net remeasurement of loss allowances*
Aset keuangan baru yang diterbitkan atau dibeli	85	-	-	85	*New financial assets originated or purchased*
Pembayaran penuh	-	-	-	-	*Fully repayment*
Valuta asing dan perubahan lain	140	-	-	140	*Foreign exchange and other movements*
	4,253	**-**	**-**	**4,253**	

*) Cadangan kerugian penurunan nilai pada Obligasi Pemerintah dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

*) *Allowance for impairment losses on Government Bonds classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the allowance for impairment losses above is adequate.

d. Tingkat suku bunga tetap tahunan

d. Annual fixed interest rates

	Rupiah %	**Dolar Amerika Serikat/*United States Dollar* %**	**Dolar Singapura/*Singapore Dollar* %**	**Euro Eropa/*European Euro* %**	**Yen Jepang/*Japanese Yen* %**	**Dolar Australia/*Australian Dollar* %**	**Yuan China/*Chinese Yuan* %**	
Suku bunga:								*Interest rate:*
2025	4.88 - 12.00	0.50 - 7.75	1.25 - 2.88	0.90 - 1.40	0.57 - 3.00	4.40	2.50	*2025*
2024	4.88 - 12.00	0.50 - 7.75	0.50 - 1.25	0.90 - 1.75	0.57 - 3.00	-	-	*2024*

e. Tingkat suku bunga mengambang tahunan

e. Annual floating interest rates

	Rupiah %	
Suku bunga:		*Interest rate:*
2025	-	*2025*
2024	6.29	*2024*

14. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

14. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2025 dan 2024 terdiri dari:

Securities purchased under agreements to resell as of 31 December 2025 and 2024 are as follows:

	2025						
Pihak lawan/ ***Counterparty***	**Jenis Sekuritas/** ***Type of Securities***	**Nilai Nominal/** ***Nominal Amount***	**Tanggal Dimulai/** ***Start Date***	**Tanggal Jatuh Tempo/** ***Maturity Date***	**Nilai Penjualan Kembali/** ***Resale Amount***	**Pendapatan Bunga yang Belum Direalisasi/** ***Unrealised Interest***	**Nilai Tercatat/** ***Carrying Value***
Pihak berelasi/*Related parties*							
Rupiah/*Rupiah*							
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
PT Bank Rakyat Indonesia (Persero) Tbk	OBN	500,000	31/12/2025	02/01/2026	503,019	58	502,961
Subtotal		4,000,000			4,024,152	464	4,023,688
Pihak ketiga/*Third parties*							
Rupiah/*Rupiah*							
Standard Chartered Bank Indonesia	OBN	500,000	12/12/2025	12/01/2026	515,197	753	514,444
Bank Indonesia	OBN	473,969	31/12/2025	07/01/2026	464,299	368	463,931
Standard Chartered Bank Indonesia	OBN	250,000	31/10/2025	30/01/2026	272,668	1,063	271,605
Standard Chartered Bank Indonesia	OBN	250,000	31/10/2025	30/01/2026	272,668	1,063	271,605
Bank Indonesia	OBN	150,000	10/12/2025	11/03/2026	144,885	1,339	143,546
Bank Indonesia	OBN	100,000	29/10/2025	28/01/2026	96,371	329	96,042
Bank Indonesia	OBN	100,000	03/12/2025	04/03/2026	94,916	775	94,141
Bank CTBC Indonesia	OBN	50,000	02/12/2025	02/01/2026	53,231	7	53,224
Bank CTBC Indonesia	OBN	50,000	02/12/2025	02/01/2026	51,920	7	51,913
Bank Indonesia	OBN	50,000	26/11/2025	25/02/2026	48,396	340	48,056
Bank Indonesia	OBN	50,000	26/11/2025	25/02/2026	48,391	337	48,054
Bank National Nobu Tbk	OBN	30,000	23/12/2025	06/01/2026	29,183	19	29,164
Bank Maybank Indonesia Tbk	OBN	20,000	29/12/2025	12/01/2026	20,658	31	20,627
Standard Chartered Bank Indonesia	OBN	20,000	29/12/2025	12/01/2026	20,621	30	20,591
Standard Chartered Bank Indonesia	OBN	20,000	23/12/2025	06/01/2026	20,599	14	20,585
Bank DBS Indonesia	OBN	20,000	30/12/2025	13/01/2026	19,915	33	19,882
Bank National Nobu Tbk	OBN	20,000	19/12/2025	02/01/2026	19,869	3	19,866
Bank National Nobu Tbk	OBN	20,000	18/12/2025	02/01/2026	19,646	3	19,643
Bank National Nobu Tbk	OBN	20,000	22/12/2025	05/01/2026	19,519	10	19,509
Bank National Nobu Tbk	OBN	20,000	24/12/2025	07/01/2026	19,164	15	19,149
Bank DBS Indonesia	OBN	10,000	31/12/2025	14/01/2026	9,927	18	9,909
Subtotal		2,223,969			2,262,043	6,557	2,255,486
Mata uang asing/*Foreign currencies*							
HSBC Ltd	OBN	316,587	29/12/2025	28/01/2026	316,587	871	315,716
HSBC Ltd	OBN	316,587	29/12/2025	28/01/2026	316,587	871	315,716
Subtotal		633,174			633,174	1,742	631,432
Total		**6,857,143**			**6,919,369**	**8,763**	**6,910,606**

14. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI (lanjutan)

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2025 dan 2024 terdiri dari: (lanjutan)

14. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL (continued)

Securities purchased under agreements to resell as of 31 December 2025 and 2024 are as follows: (continued)

2024

Pihak lawan/ *Counterparty*	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Penjualan Kembali/ *Resale Amount*	Pendapatan Bunga yang Belum Direalisasi/ *Unrealised Interest*	Nilai Tercatat/ *Carrying Value*
Pihak ketiga/*Third parties*							
Rupiah/*Rupiah*							
Bank Central Asia Tbk	OBN	500,000	19/12/2024	02/01/2025	498,201	89	498,112
Bank Indonesia	OBN	500,000	31/12/2024	07/01/2025	495,016	495	494,521
Bank DBS Indonesia	OBN	500,000	04/12/2024	02/01/2025	483,785	88	483,697
Pan Indonesia Bank Tbk	OBN	500,000	17/12/2024	14/01/2025	473,091	1,113	471,978
Bank CIMB Niaga Tbk	OBN	500,000	05/12/2024	02/01/2025	470,041	85	469,956
Bank CIMB Niaga Tbk	OBN	350,000	23/12/2024	20/01/2025	340,279	1,171	339,108
HSBC Ltd	OBN	321,900	18/12/2024	17/01/2025	326,706	641	326,065
HSBC Ltd	OBN	321,900	18/12/2024	17/01/2025	326,706	642	326,064
HSBC Ltd	OBN	321,900	23/12/2024	23/01/2025	325,561	642	324,919
Bank BNP Paribas Indonesia	OBN	250,000	23/12/2024	06/01/2025	249,769	223	249,546
BPD Jawa Barat Dan Banten Tbk	OBN	250,000	30/12/2024	13/01/2025	242,049	519	241,530
BPD Jawa Barat Dan Banten Tbk	OBN	250,000	30/12/2024	13/01/2025	242,332	520	241,812
Bank DBS Indonesia	OBN	250,000	12/12/2024	09/01/2025	241,189	349	240,840
Bank Sinar Mas Tbk	OBN	250,000	09/12/2024	06/01/2025	232,079	210	231,869
BPD Jawa Timur	OBN	250,000	30/12/2024	13/01/2025	230,464	494	229,970
BPD Jawa Timur	OBN	250,000	30/12/2024	13/01/2025	230,464	494	229,970
Bank Capital Indonesia	OBN	200,000	09/12/2024	06/01/2025	196,780	178	196,602
Bank Capital Indonesia	OBN	200,000	10/12/2024	07/01/2025	196,816	214	196,602
Bank Indonesia	OBN	200,000	30/12/2024	06/01/2025	196,305	163	196,142
Bank DBS Indonesia	OBN	200,000	25/11/2024	30/01/2025	193,365	1,040	192,325
Bank China Construction Bank Ind	OBN	200,000	10/12/2024	07/01/2025	190,049	207	189,842
HSBC Ltd	OBN	160,950	23/12/2024	23/01/2025	162,781	642	162,139
Bank National Nobu Tbk	OBN	150,000	23/12/2024	06/01/2025	145,511	130	145,381
Bank China Construction Bank Ind	OBN	150,000	09/12/2024	06/01/2025	142,898	129	142,769
Bank China Construction Bank Ind	OBN	150,000	09/12/2024	06/01/2025	142,706	129	142,577
BPD Jawa Barat Dan Banten Tbk	OBN	150,000	23/12/2024	06/01/2025	137,829	123	137,706
Bank Victoria International Tbk	OBN	100,000	20/12/2024	20/01/2025	98,429	343	98,086
Bank DBS Indonesia	OBN	100,000	03/12/2024	03/01/2025	97,980	36	97,944
Bank National Nobu Tbk	OBN	100,000	23/12/2024	06/01/2025	97,124	87	97,037
Bank Maybank Indonesia Tbk	OBN	100,000	12/12/2024	09/01/2025	92,448	134	92,314
Bank China Construction Bank Ind	OBN	80,000	17/12/2024	14/01/2025	79,936	188	79,748
Bank Indonesia	OBN	50,000	23/10/2024	22/01/2025	49,148	187	48,961
Bank Indonesia	OBN	50,000	23/10/2024	22/01/2025	49,150	191	48,959
Bank DBS Indonesia	OBN	50,000	18/10/2024	16/01/2025	49,088	136	48,952
Bank DBS Indonesia	OBN	50,000	18/10/2024	16/01/2025	49,088	136	48,952
Bank Indonesia	OBN	50,000	28/11/2024	26/02/2025	48,305	499	47,806
Bank Indonesia	OBN	50,000	28/11/2024	26/02/2025	48,301	496	47,805
Bank Maybank Indonesia Tbk	OBN	50,000	12/12/2024	09/01/2025	47,494	69	47,425
Bank Maybank Indonesia Tbk	OBN	50,000	12/12/2024	09/01/2025	46,224	67	46,157
Deutsche Bank, Jakarta	OBN	5,000	11/12/2024	08/01/2025	5,078	7	5,071
Deutsche Bank, Jakarta	OBN	5,000	18/12/2024	02/01/2025	4,911		4,911
Deutsche Bank, Jakarta	OBN	5,000	23/12/2024	06/01/2025	4,912	4	4,908
Subtotal		8,221,650			7,980,388	13,310	7,967,078
Mata uang asing/*Foreign currencies*							
Standard Chartered Bank Indonesia	OBN	5,000	27/12/2024	10/01/2025	4,852	7	4,845
		8,226,650			**7,985,240**	**13,317**	**7,971,923**

14. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI (lanjutan)

Kolektabilitas efek-efek dengan janji dijual kembali sesuai dengan peraturan OJK diungkapkan pada Catatan 61i.

Tingkat suku bunga tetap tahunan:

14. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL (continued)

Collectibility securities purchased under agreements to resell in accordance with OJK regulation are disclosed in Note 61i.

Annual fixed interest rates:

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Suku bunga kontrak:			*Contractual interest rate:*
2025	4.20 - 4.90	3.93 - 4.90	*2025*
2024	6.45 - 6.80	4.37 - 4.57	*2024*

15. BEBAN DIBAYAR DI MUKA

Beban dibayar di muka terdiri dari:

15. PREPAID EXPENSES

Prepaid expenses consist of:

	2025	2024	
Asuransi	1,322,611	1,559,420	*Insurance*
Sewa dibayar di muka	253,935	259,118	*Prepaid rent*
Perbaikan dan pemeliharaan	248,927	336,954	*Service and maintenance*
Promosi	45,425	128,661	*Promotion*
Biaya tangguhan	7,023	12,590	*Deferred expenses*
Lainnya	396,841	644,366	*Others*
	2,274,762	**2,941,109**	

16. INVESTASI PADA ENTITAS ASOSIASI

Otoritas Jasa Keuangan (OJK) Pasar Modal telah menyetujui pernyataan penggabungan usaha PT BRI Syariah Tbk, PT Bank BNI Syariah dan PT Bank Syariah Mandiri melalui surat No. S-289/D.04/2020 tertanggal 11 Desember 2020 serta melalui surat OJK Perbankan No. 4/KDK.03/2021 tanggal 27 Januari 2021. Penggabungan usaha tersebut berlaku efektif di tanggal 1 Februari 2021 dan hasil penggabungan usaha akan menggunakan nama PT Bank Syariah Indonesia Tbk.

16. INVESTMENTS IN ASSOCIATES

The Financial Service Authority (OJK) Capital Market has approved the statement of merger of businesses of PT BRI Syariah Tbk, PT Bank BNI Syariah and PT Bank Syariah Mandiri through letter No. S-289/D.04/2020 dated 11 December 2020 and OJK Perbankan through letter No. 4/KDK.03/2021 dated 27 January 2021. The merger of businesses is effective on 1 February 2021 and the merger of businesses result will use name of PT Bank Syariah Indonesia Tbk.

16. INVESTASI PADA ENTITAS ASOSIASI (lanjutan)

Pada tanggal 19 Desember 2022, PT Bank Syariah Indonesia Tbk ("BSI") melakukan Penawaran Umum Terbatas dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu (HMETD) sebanyak 4.999.952.795 saham. Grup berhak membeli saham baru sebanyak 1.242.439.344 saham dengan harga Rp1.000 (nilai penuh) per lembar saham. Grup menggunakan sebagian HMETD dan meningkatkan penyertaan modal sahamnya terhadap BSI sebanyak 500.000.000 saham dengan harga Rp500.000. Sisa HMETD Grup dialihkan ke PT CIMB Sekuritas dimana Grup mendapatkan kas sebesar Rp74.244. Peningkatan dalam penyertaan modal terhadap BSI menyebabkan persentase kepemilikan terhadap BSI terdilusi menjadi 23,24% dan Grup membukukan keuntungan dari saham terdilusi senilai Rp46.794.

***16. INVESTMENT IN ASSOCIATES** (continued)*

On 19 December 2022, PT Bank Syariah Indonesia Tbk ("BSI") undertook a Limited Public Offering through the issuance of pre-emptive rights of 4,999,952,795 shares. Group was entitled to buy new 1,242,439,344 shares for Rp1,000 (full amount) per share. Group increased its capital through the pre-emptive rights to BSI by 500,000,000 shares with total price of Rp500,000. Remaining pre-emptive rights of the Group was transferred to PT CIMB Sekuritas whereas Group gain cash amounted to Rp74,244. Increased capital to BSI lead to Group percentage of ownership diluted to 23.24% and Group recorded gain from diluted shares of Rp46,794.

Pada tanggal 31 Desember 2025 dan 2024, entitas asosiasi yang dimiliki oleh Grup adalah sebagai berikut:

As of 31 December 2025 and 2024, the associate of the Group was as follow:

	2025			
Nama Perusahaan	**Kegiatan Usaha/ *Business Activity***	**Persentase Kepemilikan/ *Percentage of Ownership***	**Nilai tercatat/ *Carrying Value***	***Company Name***
PT Bank Syariah Indonesia Tbk	Perbankan/*Banking*	23.24%	14,354,281	*PT Bank Syariah Indonesia Tbk*

	2024			
Nama Perusahaan	**Kegiatan Usaha/ *Business Activity***	**Persentase Kepemilikan/ *Percentage of Ownership***	**Nilai tercatat/ *Carrying Value***	***Company Name***
PT Bank Syariah Indonesia Tbk	Perbankan/*Banking*	23.24%	12,748,127	*PT Bank Syariah Indonesia Tbk*

Berikut ini adalah ringkasan informasi keuangan PT Bank Syariah Indonesia Tbk yang digunakan untuk pencatatan metode ekuitas pada tanggal 31 Desember 2025 dan 2024, dan untuk tahun yang berakhir pada tanggal-tanggal tersebut, yang dicatat dengan menggunakan metode ekuitas.

The following table is the summarised financial information for PT Bank Syariah Indonesia Tbk used for equity method accounting as of 31 December 2025 and 2024, and for the years then ended, which are accounted for using the equity method.

	2025	**2024**	
Aset	456,192,606	408,613,432	*Assets*
Liabilitas	404,239,731	363,571,858	*Liabilities*
Aset bersih	51,952,875	45,041,574	*Net assets*

	2025	**2024**	
Pendapatan	28,265,491	30,854,683	*Revenue*
Laba bersih tahun berjalan	7,567,523	7,005,888	*Net income for the year*
Penghasilan komprehensif lain setelah pajak	394,661	152,124	*Other comprehensive income after tax*
Jumlah penghasilan komprehensif tahun berjalan	7,962,184	7,158,012	*Total comprehensive income for the year*

16. INVESTASI PADA ENTITAS ASOSIASI (lanjutan)

16. INVESTMENT IN ASSOCIATES (continued)

Jumlah bagian Grup atas penghasilan komprehensif dan jumlah tercatat pada entitas asosiasi adalah sebagai berikut:

Total Group's share of comprehensive income and carrying value of associates are as follows:

	2025	2024	
Saldo awal	12,748,127	11,283,466	*Beginning balance*
Bagian atas laba bersih	1,758,657	1,628,136	*Share of net income*
Bagian atas laba komprehensif lain	91,717	35,354	*Share of other comprehensive income*
Jumlah bagian atas penghasilan komprehensif	1,850,374	1,663,490	*Total share of comprehensive income*
Dividen yang diterima	(244,220)	(198,829)	*Dividend received*
Jumlah tercatat	14,354,281	12,748,127	*Carrying value*

Rekonsiliasi atas ringkasan informasi keuangan yang disajikan terhadap nilai buku dari kepentingan entitas asosiasi adalah sebagai berikut:

Reconciliation of the summarised financial information presented to the carrying amount of its interest in associate is as follows:

	2025	2024	
Saldo awal tahun	45,041,574	38,739,122	*Beginning balance of the year*
Laba bersih tahun berjalan	7,567,523	7,005,888	*Net income for the year*
Penghasilan komprehensif lain setelah pajak	394,661	152,124	*Other comprehensive income after tax*
Pembayaran dividen	(1,050,883)	(855,560)	*Dividend payment*
	51,952,875	45,041,574	
Persentase kepemilikan efektif	23.24%	23.24%	*Percentage of effective ownership*
	12,092,010	10,485,856	
Goodwill	2,262,271	2,262,271	*Goodwill*
Nilai tercatat	14,354,281	12,748,127	*Carrying value*

Pada tanggal 31 Desember 2025, nilai wajar kepemilikan saham Grup pada PT Bank Syariah Indonesia Tbk, perusahaan yang terdaftar pada BEI, adalah Rp23.906.114 menggunakan harga penutupan tanggal 31 Desember 2025. (31 Desember 2024: Rp29.266.229)

As at 31 December 2025, the fair value of the Group's interest in PT Bank Syariah Indonesia Tbk, which is listed on the IDX, was Rp23,906,114 using the closing price on 31 December 2025. (31 December 2024: Rp29,266,229).

17. PENYERTAAN SAHAM - BERSIH / *17. EQUITY INVESTMENTS - NET*

Penyertaan jangka panjang / *Long-term equity investments*

	Nilai Wajar/ *Fair Value*		
	2025	**2024**	
Klasifikasi nilai wajar melalui penghasilan komprehensif lain	652,311	637,280	*Classified as fair value through other comprehensive income*

Penyertaan jangka panjang berdasarkan kolektibilitas sesuai Peraturan OJK diungkapkan pada Catatan 61j.

The classification of long-term equity investments based on Financial Service Authority Rule collectibility are disclosed in Note 61j.

Grup mengklasifikasikan investasi berikut pada nilai wajar melalui penghasilan komprehensif lain. Klasifikasi pada nilai wajar melalui penghasilan komprehensif lain dibuat dengan pertimbangan investasi akan dimiliki dalam jangka panjang untuk kepentingan strategis.

The Group designated certain investment as at fair value through comprehensive income (FVOCI). The FVOCI designation was made because the investments are expected to be held for the long-term strategic purposes.

Penyertaan saham terdiri dari: / *Equity investment consist of:*

Nama Perusahaan/*Company Name*	2025 Persentase Kepemilikan/ *Percentage of Ownership*	2024 Persentase Kepemilikan/ *Percentage of Ownership*	2025 Biaya perolehan/ *Acquisition cost*	2025 Nilai wajar/ *Fair value*	2024 Biaya perolehan/ *Acquisition cost*	2024 Nilai wajar/ *Fair value*
Nilai wajar melalui penghasilan komprehensif lain/*fair value through other comprehensive income*						
PT Fintek Karya Nusantara	9.82%	9.82%	200,000	290,674	200,000	369,614
PT Bank Mizuho Indonesia	1.00%	1.00%	75,375	75,375	75,375	75,375
PT Bank SMBC Indonesia Tbk (dahulu/*previously* PT Bank BTPN Tbk)	0.11%	0.11%	19,250	25,695	19,250	26,896
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	17.50%	17.50%	3,500	164,561	3,500	71,019
PT Kustodian Sentral Efek Indonesia	2.50%	2.50%	7,500	7,500	7,500	7,500
PT Pemeringkat Efek Indonesia	0.14%	0.14%	158	158	158	158
PT Bursa Efek Indonesia	0.97%	0.97%	7,500	7,500	7,500	7,500
PT Kliring Penjaminan Efek Indonesia	1.11%	1.11%	20,000	20,000	20,000	20,000
Lain-lain/*Others*	0.03%	0.03%	11,808	11,808	14,434	14,434
			345,091	603,271	347,717	592,496
Nilai wajar melalui laba rugi/ *fair value through profit or loss*						
Lain-lain/*Others*	1.35%-20.00%	1.35%-20.00%	48,529	49,040	40,392	44,784
			393,620	652,311	388,109	637,280

18. ASET LAIN-LAIN - BERSIH / *18. OTHER ASSETS - NET*

Aset lain-lain - bersih terdiri dari: / *Other assets - net consist of:*

	2025	2024*)	
Piutang bunga	5,754,498	4,764,476	*Interest receivables*
Piutang lain-lain setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp1.031.857 pada tanggal 31 Desember 2025 dan 31 Desember 2024	4,361,300	2,515,207	*Other receivables, net of allowance for impairment losses of Rp1,031,857 as of 31 December 2025 and 31 December 2024*
Piutang terkait transaksi ATM dan kartu kredit	3,184,851	1,579,054	*Receivables from transactions related to ATM and credit card*
Agunan yang diambil alih setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp772.964 pada tanggal 31 Desember 2025 dan 31 Desember 2024	864,637	914,825	*Foreclosed collaterals, net of allowance for impairment losses of Rp772,964 as of 31 December 2025 and 31 December 2024*
Piutang nasabah - Entitas Anak	784,695	307,236	*Receivables from customers - Subsidiary*
Term Deposit Valas Devisa Hasil Ekspor	400,200	909,368	*Foreign Exchange Term Deposit from Export Activities*
Persediaan kantor	349,598	446,588	*Office supplies*
Beban komisi ditangguhkan	44,444	51,111	*Deferred commission expenses*
Lain-lain setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.566 pada tanggal 31 Desember 2025 dan Rp27.758 pada tanggal 31 Desember 2024	3,196,423	2,647,556	*Others, net of allowance for impairment losses of Rp27,566 as of 31 December 2025 and Rp27,758 as of 31 December 2024*
	18,940,646	**14,135,421**	

*) Disajikan kembali (lihat Catatan 60) / *) *Restated (see Note 60)*

Pada tanggal 31 Desember 2025, piutang bunga sebagian besar merupakan bunga yang berasal dari pinjaman yang diberikan dan Obligasi Pemerintah masing-masing sebesar Rp 2.690.430 dan Rp 2.437.631 (31 Desember 2024: Rp2.258.031 dan Rp1.884.514).

As of 31 December 2025, interest receivables are mostly comprised of interest from loans and Government Bonds amounting to Rp 2,690,430 and Rp 2,437,631, respectively (31 December 2024: Rp2,258,031 and Rp1,884,514).

Piutang lain-lain sebagian besar merupakan imbal jasa penjaminan, piutang kepada pemerintah, termasuk deposit pajak dan piutang transaksi penjaminan emisi.

Other receivables mostly comprised of guarantee fee, governments receivables, including tax deposits and receivable from underwriting activities.

BNI telah melakukan upaya penyelesaian atas agunan yang diambil alih dengan melakukan upaya penjualan dalam bentuk lelang atau pengambilalihan agunan oleh investor atas agunan yang diambil alih.

BNI has made efforts to settle foreclosed collaterals by making an attempt to sell in the form of an auction or take over of collateral by investors on foreclosed collaterals.

Properti terbengkalai termasuk di dalam pos "Lain-lain" sebesar Rp 2.428 setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.566 dan akumulasi penyusutan properti terbengkalai sebesar Rp1.995 pada tanggal 31 Desember 2025 dan sebesar Rp2.279 setelah dikurangi cadangan kerugian penurunan nilai sebesar Rp27.566 dan akumulasi penyusutan properti terbengkalai sebesar Rp1.995 pada tanggal 31 Desember 2024.

Abandoned properties are included in "Others" amounting to Rp2,428, net of allowance for impairment losses of Rp27,566, and accumulated depreciation of Rp1,995, as of 31 December 2025 and amounting to Rp2,279, net of allowance for impairment losses of Rp27,566, and accumulated depreciation of Rp1,995, as of 31 December 2024.

BNI telah melakukan upaya penyelesaian atas properti terbengkalai dalam bentuk pemanfaatan untuk kegiatan operasional Bank (kantor, *outlet*, galeri, rumah dinas dan gudang kearsipan).

BNI has made efforts to resolve abandoned properties by utilising them for the Bank's operational activities (offices, outlets, gallery, official houses and warehouse).

Term Deposit Valas Devisa Hasil Ekspor merupakan suatu instrumen dimana dana devisa hasil ekspor dari rekening khusus eksportir ditempatkan pada Bank Indonesia melalui rekening Bank sesuai mekanisme pasar.

Term Deposits of Foreign Exchange from Export Proceeds is an instrument where foreign exchange from export proceeds from exporters' special account are placed in Bank Indonesia through Bank's accounts in accordance with market mechanisms.

18. ASET LAIN-LAIN - BERSIH (lanjutan)

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang dibentuk atas aset-aset yang disebutkan di atas telah memadai.

18. OTHER ASSETS - NET (continued)

Management believes that the allowance for impairment losses on the respective assets outlined above is adequate.

19. ASET TETAP DAN ASET HAK-GUNA

19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS

	2025					
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Disposals*	Reklasifikasi/ *Reclassification*	Saldo akhir/ *Ending balance*	
Aset kepemilikan langsung:						*Direct ownership assets:*
Tanah	17,168,838	303	-	-	17,169,141	*Land*
Bangunan	9,969,505	894,067	(16,796)	1,000,941	11,847,717	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	16,299,868	1,120,137	(348,919)	819,674	17,890,760	*Office equipment and motor vehicles*
Aset dalam pembangunan	2,267,339	907,857	(158,838)	(1,820,615)	1,195,743	*Construction in progress*
	45,705,550	2,922,364	(524,553)	-	48,103,361	
Aset sewa pembiayaan:						*Leased assets:*
Aset hak-guna	3,110,393	780,182	(1,263,234)	-	2,627,341	*Right-of-use of assets*
	48,815,943	3,702,546	(1,787,787)	-	50,730,702	
Akumulasi Penyusutan:						*Accumulated depreciation:*
Bangunan	3,876,562	678,637	(13,148)	-	4,542,051	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	13,174,713	1,191,929	(322,085)	-	14,044,557	*Office equipment and motor vehicles*
	17,051,275	1,870,566	(335,233)	-	18,586,608	
Aset sewa pembiayaan:						*Leased assets:*
Aset hak-guna	1,356,432	748,793	(1,073,766)	-	1,031,459	*Right-of-use of assets*
	18,407,707	2,619,359	(1,408,999)	-	19,618,067	
Nilai buku bersih	**30,408,236**				**31,112,635**	***Net book value***

	2024						
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Disposals*	Reklasifikasi/ *Reclassification*	Revaluasi/ *Revaluation*	Saldo akhir/ *Ending balance*	
Aset kepemilikan langsung:							*Direct ownership assets:*
Tanah	16,364,369	51,946	(32,965)	-	785,488	17,168,838	*Land*
Bangunan	9,245,305	726,526	(676,277)	80,497	593,454	9,969,505	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	15,186,865	1,043,181	(403,650)	473,472	-	16,299,868	*Office equipment and motor vehicles*
Aset dalam pembangunan	1,239,297	1,832,400	(250,389)	(553,969)	-	2,267,339	*Construction in progress*
	42,035,836	3,654,053	(1,363,281)	-	1,378,942	45,705,550	
Aset sewa pembiayaan:							*Leased assets:*
Aset hak-guna	2,652,014	1,168,843	(710,464)	-	-	3,110,393	*Right-of-use of assets*
	44,687,850	4,822,896	(2,073,745)	-	1,378,942	48,815,943	
Akumulasi Penyusutan:							*Accumulated depreciation:*
Bangunan	3,365,881	579,741	(78,951)	-	9,891	3,876,562	*Buildings*
Perlengkapan kantor dan kendaraan bermotor	12,317,256	1,092,531	(235,074)	-	-	13,174,713	*Office equipment and motor vehicles*
	15,683,137	1,672,272	(314,025)	-	9,891	17,051,275	
Aset sewa pembiayaan:							*Leased assets:*
Aset hak-guna	1,239,857	734,629	(618,054)	-	-	1,356,432	*Right-of-use of assets*
	16,922,994	2,406,901	(932,079)	-	9,891	18,407,707	
Nilai buku bersih	**27,764,856**					**30,408,236**	***Net book value***

*) Nilai revaluasi aset tetap merupakan hasil penilaian kembali aset tetap Entitas Anak.

**) The revaluation value of fixed assets is the result of reappraisal of the Subsidiary fixed assets*

Pada tanggal 31 Desember 2025 dan 2024, Grup melakukan peninjauan kembali atas masa manfaat, metode penyusutan, dan nilai residu aset tetap dan menyimpulkan bahwa tidak terdapat perubahan atas metode dan asumsi tersebut.

As of 31 December 2025 and 2024, the Group performed a review on useful life, depreciation method, and residual value of fixed assets and concluded that there was no change in those methodology and assumptions.

Beban penyusutan aset tetap untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp1.870.566 dan Rp1.682.163 dicatat pada beban umum dan administrasi pada laporan laba rugi.

Depreciation expense of fixed assets for the years ended 31 December 2025 and 2024 amounted to Rp1,870,566 and Rp1,682,163 are recorded on general and administrative expense in the statement of profit or loss.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Aset tetap yang telah terdepresiasi penuh namun masih digunakan oleh Grup sebesar Rp10.986.827 dan Rp10.439.599 masing-masing pada tanggal 31 Desember 2025 dan 2024 , antara lain berupa perlengkapan kantor dan kendaraan bermotor.

Manajemen berkeyakinan bahwa tidak terdapat penurunan nilai aset tetap yang dimiliki Grup selama tahun berjalan karena manajemen berpendapat bahwa nilai tercatat aset tetap tidak melebihi estimasi nilai yang dapat diperoleh kembali.

Aset tetap Bank pada tanggal 31 Desember 2025 diasuransikan terhadap risiko kebakaran dan pencurian kepada pihak perusahaan asuransi PT Asuransi Tripakarta yang merupakan pihak berelasi dengan Grup. Nilai pertanggungan asuransi tersebut sebesar Rp17.358.436 (31 Desember 2024: Rp17.308.556). Manajemen berpendapat bahwa nilai pertanggungan tersebut cukup untuk menutupi kemungkinan kerugian atas aset tersebut.

Aset dalam Pembangunan pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

	2025	2024	
Tanah	-	337	*Land*
Bangunan	282,283	1,336,241	*Buildings*
Peralatan kantor	913,460	930,761	*Office equipment*
	1,195,743	2,267,339	

Estimasi persentase tingkat penyelesaian Aset dalam Pembangunan pada tanggal 31 Desember 2025 adalah berkisar antara 85% - 91% dan 31 Desember 2024: 21% - 84% Aset dalam Pembangunan pada tanggal 31 Desember 2025 dan 2024 tersebut diperkirakan akan selesai masing-masing pada tahun 2026.

Tidak ada aset tetap yang dijaminkan.

Berdasarkan keputusan No. KEP-347/BL/2012 tanggal 25 Juni 2012 berdasarkan Peraturan No. VIII.G.7 tentang Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik butir 27.e, dengan mempertimbangkan nilai buku aset tetap (tanah dan bangunan) yang telah dilakukan revaluasi pada tahun 2015, 2018 dan 2021, maka pada tahun 2024 Grup telah menugaskan perusahaan jasa penilai terdaftar untuk melaksanakan penilaian (revaluasi) aset tetap (tanah dan bangunan).

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

The fixed assets that have been fully depreciated but still in use by the Group amounted to Rp10,986,827 and Rp10,439,599 as of 31 December 2025 and 2024, respectively, including, among others, office equipment and motor vehicles.

Management believes that there is no impairment in the value of fixed assets owned by the Group during the year because management believes that the carrying amounts of fixed assets do not exceed the estimated recoverable amount.

As of 31 December 2025, the fixed assets of the Bank were insured against risk of fire and theft to the insurance company PT Asuransi Tripakarta, which is an affiliated party with the Group. with sum insured amounting to Rp17,358,436 (31 December 2024: Rp17,308,556). Management believes that the sum insured is adequate to cover possible losses on the assets insured.

Construction in Progress as of 31 December 2025 and of 31 December 2024 are as follows:

The estimated percentage of completion of Construction in Progress as of 31 December 2025 is between 85% - 91% and 31 December 2024: 21% - 84% Those Construction in Progress as of 31 December 2025 and 2024 are estimated to be completed in 2026, respectively.

There were no fixed assets pledged as collateral.

Based on Decision No. KEP-347/BL/2012 dated 25 June 2012 based on Regulation No. VIII.G.7 concerning presentation and disclosure of Financial Reports of Issuer or a Public Companies in point 27.e, by considering the book value of fixed assets (land and buildings) that on which revaluation has been conducted in 2015, 2018 and 2021, therefore in 2024, the Group assigned registered independent appraisers to appraise (revaluate) its fixed assets (land and buildings).

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Grup melakukan penilaian kembali atas tanah dan bangunan tersebut bukan untuk tujuan perpajakan tetapi hanya untuk pemenuhan ketentuan tersebut.

Penilaian atas tanah dan bangunan dilakukan oleh penilai independen eksternal sebagai berikut:
a) KJPP Toha Okky Heru & Rekan
b) KJPP Rengganis Hamid & Rekan
c) KJPP Toto Suharto & Rekan
d) KJPP Abdullah Fitriantoro & Rekan

Penilaian dilakukan berdasarkan Standar Penilaian Indonesia, ditentukan berdasarkan transaksi pasar terkini dan dilakukan dengan ketentuan - ketentuan yang lazim. Metode penilaian yang dipakai adalah metode data pasar, metode biaya dan metode pendapatan. Elemen-elemen yang digunakan dalam perbandingan data untuk menentukan nilai wajar aset antara lain:

a) Jenis dan hak yang melekat pada properti
b) Kondisi pasar
c) Lokasi
d) Karakteristik fisik
e) Karakteristik dalam menghasilkan pendapatan
f) Karakteristik tanah

Informasi mengenai penilaian kembali aset tetap pada tanggal 31 Desember 2024 untuk kelompok aset tanah dan bangunan Grup di Indonesia dan luar negeri adalah sebagai berikut:

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

The Group has revalued the value of that land and buildings not for tax purpose rather for the compliance of the aforementioned regulation.

The valuations of land and buildings are performed by the following external independent appraisers:
a) KJPP Toha Okky Heru & Rekan
b) KJPP Rengganis Hamid & Rekan
c) KJPP Toto Suharto & Rekan
d) KJPP Abdullah Fitriantoro & Rekan

Valuations are performed based on Indonesian Valuation Standards, determined based on reference to recent market transactions done on arm's length terms and appropriate requirements. The valuation methods used are market value approach, cost approach and income approach. Elements used in data comparison to determine fair value of assets, among others are as follows:

a) Types and rights attached to the property
b) Market condition
c) Location
d) Physical characteristics
e) Income producing characteristics
f) Land characteristics

Information on revaluation of land and buildings of the Group on 31 December 2024 located in Indonesia and overseas are as follows:

	Nilai Buku Sebelum Revaluasi/ *Carrying Amount Before Revaluation*	Nilai Buku Setelah Revaluasi/ *Carrying Amount after Revaluation*	Keuntungan Revaluasi bersih/ *Net gain revaluation*	
Tanah	16,206,563	16,992,051	785,488	*Land*
Bangunan	5,081,867	5,675,321	593,454	*Buildings*
Jumlah	**21,288,430**	**22,667,372**	**1,378,942**	***Total***

Penilaian kembali yang dilakukan atas tanah menghasilkan jumlah kenaikan nilai tercatat sebesar Rp785.488 yang terdiri dari kenaikan nilai tanah yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp785.730 dan penurunan nilai tanah yang diakui sebagai beban pada laba rugi tahun 2024 sebesar Rp242.

Kenaikan nilai tercatat yang timbul dari revaluasi bangunan dicatat sebesar Rp593.454. Kenaikan ini terdiri dari kenaikan nilai bangunan yang dicatat sebagai "Penghasilan Komprehensif Lain" sebesar Rp589.920 dan yang diakui sebagai pendapatan pada laba rugi tahun 2024 sebesar Rp3.534.

The revaluation of land resulted in an increase in the carrying amount of land amounting to Rp785,488 which consists of the increase in the carrying amount of land recognised as "Other Comprehensive Income" amounting to Rp785,730 and a decrease in carrying amount of land recognised in 2024 expenses in the profit/loss amounting to Rp242.

Increase in carrying amount of buildings from the revaluation of building is recorded at Rp593,454. The increase consists of the increase in the carrying amount of buildings recognised in "Other Comprehensive Income" amounting to Rp589,920 and recognised in 2024 income in the profit/loss amounting to Rp3,534.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

***19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS** (continued)*

Secara total kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Penghasilan Komprehensif Lain" adalah sebesar Rp1.375.650. Kenaikan nilai tercatat yang timbul dari revaluasi dicatat sebagai pendapatan pada tahun 2024 adalah sebesar Rp3.292.

In total, the increase in the carrying amount from revaluation of land and buildings is recognised in "Other Comprehensive Income" amounting to Rp1,375,650. The increase of carrying amount from revaluation results recognised in 2024 income amounting to Rp3,292.

Jika tanah dan bangunan dicatat sebesar harga perolehan, maka dicatat dalam jumlah sebagai berikut:

If land and buildings were recorded using historical cost basis, the amount would be as follows:

	2025	2024	
Tanah	1,783,052	1,772,751	*Land*
Bangunan			*Buildings*
Harga perolehan	2,860,218	2,984,245	*Cost*
Akumulasi penyusutan	(2,815,250)	(2,882,207)	*Accumulated depreciation*
Nilai buku bangunan	44,968	102,038	*Net book amount*
Jumlah nilai buku bersih	1,828,020	1,874,789	*Total net book value*

Perubahan cadangan revaluasi aset bersih setelah pajak adalah sebagai berikut:

The movements in the asset revaluation reserve net of tax are as follows:

	Cadangan revaluasi aset, bersih setelah pajak/ *Asset revaluation reserve, net of tax*	
Saldo per 31 Desember 2024	16,711,395	*Balance as of 31 December 2024*
Realisasi surplus revaluasi akibat dampak kehilangan pengendalian	-	*Revaluation surplus realisation due to impact of loss of control*
Saldo per 31 Desember 2025	16,711,395	*Balance as of 31 December 2025*

	Cadangan revaluasi aset, bersih setelah pajak/ *Asset revaluation reserve, net of tax*	
Saldo per 31 Desember 2023	15,447,829	*Balance as of 31 December 2023*
Realisasi surplus revaluasi akibat dampak kehilangan pengendalian	1,263,566	*Revaluation surplus realisation due to impact of loss of control*
Saldo per 31 Desember 2024	16,711,395	*Balance as of 31 December 2024*

Pada tanggal 31 Desember 2025 dan 2024, selain tanah dan bangunan, tidak terdapat perbedaan yang signifikan antara nilai wajar aset tetap dengan nilai tercatatnya.

As of 31 December 2025 and 2024, there is no significant difference between the fair value and carrying value of fixed assets other than land and buildings.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS (continued)*

Perhitungan keuntungan/(kerugian) penjualan dan penghapusan aset tetap sebagai berikut:

Calculation of gain/(loss) on sale and write-off of fixed assets as follows:

	2025	2024	
Harga perolehan	238,799	157,689	*Acquisition cost*
Akumulasi penyusutan	(230,844)	(142,176)	*Accumulated depreciation*
Nilai buku aset tetap yang dijual dan dihapus	7,955	15,513	*Book value of disposed fixed assets*
Hasil penjualan dan penghapusan aset tetap	15,911	26,713	*Proceeds from disposal of fixed assets*
Keuntungan dari penjualan dan penghapusan aset tetap	7,956	11,200	*Gain on sale and write-off of fixed assets*

Aset hak-guna pada 31 Desember 2025 dan 2024 adalah sebagai berikut:

Right-of-use of assets as of 31 December 2025 and 2024 as follows:

	2025				
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Disposals***	**Saldo akhir/ *Ending balance***	
Biaya perolehan					*Cost*
Tanah dan bangunan	2,679,307	608,050	(1,247,999)	2,039,358	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	431,086	172,132	(15,235)	587,983	*Office equipment and motor vehicles*
	3,110,393	780,182	(1,263,234)	2,627,341	
Akumulasi penyusutan					*Accumulated depreciation*
Tanah dan bangunan	1,282,209	626,161	(1,063,749)	844,621	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	74,223	122,632	(10,017)	186,838	*Office equipment and motor vehicles*
	1,356,432	748,793	(1,073,766)	1,031,459	
Nilai buku bersih	**1,753,961**			**1,595,882**	***Net book value***

	2024				
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Disposals***	**Saldo akhir/ *Ending balance***	
Biaya perolehan					*Cost*
Tanah dan bangunan	2,585,309	703,770	(609,772)	2,679,307	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	66,705	465,073	(100,692)	431,086	*Office equipment and motor vehicles*
	2,652,014	1,168,843	(710,464)	3,110,393	
Akumulasi penyusutan					*Accumulated depreciation*
Tanah dan bangunan	1,188,905	650,647	(557,343)	1,282,209	*Land and buildings*
Perlengkapan kantor dan kendaraan bermotor	50,952	83,982	(60,711)	74,223	*Office equipment and motor vehicles*
	1,239,857	734,629	(618,054)	1,356,432	
Nilai buku bersih	**1,412,157**			**1,753,961**	***Net book value***

Grup menyewa beberapa aset termasuk rumah dinas, gedung kantor, ruang ATM, kendaraan dan lain-lain. Rata-rata masa sewa adalah 5 (lima) tahun.

The Group has rented a number of assets which include official houses, offices, ATM space, vehicle and others. The average of lease term is 5 (five) years.

19. ASET TETAP DAN ASET HAK-GUNA (lanjutan)

Jumlah pengeluaran kas untuk sewa selama tahun yang berakhir pada 31 Desember 2025 adalah Rp547.116 (31 Desember 2024: Rp870.149).

Beban penyusutan aset hak-guna untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp748.793 dan Rp734.629 dicatat pada beban umum dan administrasi pada laporan laba rugi.

19. FIXED ASSETS AND RIGHT-OF-USE OF ASSETS *(continued)*

The total cash outflow for leases for the year ended 31 December 2025 is amounting to Rp547,116 (31 December 2024: Rp870,149).

Depreciation expense of right-of-use of assets for the year ended 31 December 2025 and 2024 amounted to Rp748,793 and Rp734,629 are recorded on general and administrative expense in the statement of profit or loss.

20. ASET TAKBERWUJUD

Aset takberwujud terdiri dari:

20. INTANGIBLE ASSETS

Intangible assets consist of the following:

	2025	2024	
Goodwill	727,786	727,786	*Goodwill*
Hubungan pelanggan	14,419	15,528	*Customer relationships*
	742,205	**743,314**	

Pada bulan Mei 2022, Grup telah mengakuisisi PT Bank Hibank Indonesia. Atas transaksi ini, Grup memperoleh *goodwill* dan aset takberwujud tertentu berupa kontrak hubungan pelanggan dan merek dagang.

In May 2022, the Group acquired PT Bank Hibank Indonesia. As a result of this acquisition, the Group recognised goodwill and certain intangible assets, such as contractual customer relationships and trademarks.

Penurunan nilai atas *goodwill*

Pengujian penurunan nilai atas *goodwill* yang dilakukan setiap tahun (pada tanggal 31 Desember) dan ketika terdapat suatu indikasi bahwa nilai tercatatnya mengalami penurunan nilai.

Nilai terpulihkan ditentukan berdasarkan perhitungan nilai wajar dikurangi biaya yang menggunakan metode *Discounted Cash Flow* 5 tahun. Grup menentukan unit penghasil kas ("UPK") sejalan dengan Bank Hibank sebagai UPK sendiri. Nilai tersebut dikategorikan berada dalam kategori pengukuran nilai wajar level 3.

Asumsi kunci yang digunakan dalam perhitungan nilai wajar dikurangi biaya untuk menjual pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

Impairment of goodwill

Goodwill are tested for impairment annually (as at 31 December) and when circumstances indicate that the carrying value may be impaired.

The recoverable amount was determined based on fair value less cost of disposal calculations that uses the 5 years Discounted Cash Flow method. The Group determine the cash generating unit ("CGU") aligned with the Bank Hibank as a separate CGU. The value is within the category of fair value measurement level 3.

Certain key assumptions used in the fair value less cost of disposal calculation at 31 December 2025 and 2024 are as follows

	2025	2024	
Tingkat pertumbuhan	5.06%	4.95%	*Growth rate*
Tingkat diskonto (WACC)	8.26%	9.97%	*Discount rate (WACC)*

Tidak ada penurunan nilai *goodwill* yang diidentifikasi.

No impairment of the goodwill was identified.

21. LIABILITAS SEGERA / *21. OBLIGATIONS DUE IMMEDIATELY*

	2025	2024	
Rupiah			***Rupiah***
Kewajiban sebagai *issuer* bank (ATM)	2,522,441	1,205,173	*Obligation as issuer bank*
Simpanan sementara yang belum diselesaikan	1,310,097	1,147,547	*Temporary deposit transactions not yet settled*
Kerjasama pihak ketiga	502,625	803,381	*Third party agreements*
Setoran pajak sebagai bank persepsi	351,483	421,350	*Tax collection received as collecting bank*
Dana setoran *smartpay*	254,988	222,426	*Fund deposits for smartpay*
Dana *trust*	188,023	264,505	*Fund deposits for trust*
Dana setoran cek	46,138	54,964	*Fund deposits for cheques*
Kiriman uang	25,278	47,774	*Money transfers*
Lainnya	22,768	21,279	*Others*
	5,223,841	4,188,399	
Mata uang asing			***Foreign currencies***
Dana *trust*	338,366	981,005	*Fund deposits for trust*
Kiriman uang	81,659	59,205	*Money transfers*
Setoran pajak sebagai bank persepsi	79,173	79,194	*Tax collection received as collecting bank*
Simpanan sementara yang belum diselesaikan	33,110	198,926	*Temporary deposit transactions not yet settled*
Kerjasama pihak ketiga	4,876	4,598	*Third party agreements*
Lainnya	12	3,393	*Others*
	537,196	1,326,321	
	5,761,037	**5,514,720**	

22. SIMPANAN NASABAH / *22. DEPOSITS FROM CUSTOMERS*

Informasi mengenai simpanan berdasarkan pihak yang berelasi diungkapkan pada Catatan 46l.

Information with respect to transactions with related parties are disclosed in Note 46l.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025	2024	
Rupiah			***Rupiah***
Giro	308,227,428	192,230,190	*Current accounts*
Deposito berjangka	278,350,740	201,908,287	*Time deposits*
Tabungan	273,547,491	247,370,321	*Savings accounts*
	860,125,659	641,508,798	
Mata uang asing			***Foreign currencies***
Giro	131,271,436	113,503,338	*Current accounts*
Deposito berjangka	36,524,669	40,324,680	*Time deposits*
Tabungan	12,912,660	10,174,032	*Savings accounts*
	180,708,765	164,002,050	
	1,040,834,424	**805,510,848**	

22. SIMPANAN NASABAH (lanjutan) / *22. DEPOSITS FROM CUSTOMERS (continued)*

a. Berdasarkan jenis dan mata uang (lanjutan) / *a. By type and currency (continued)*

Perincian simpanan nasabah berdasarkan mata uang adalah sebagai berikut:

Deposits from customers based on currencies are as follows:

	2025	2024	
Rupiah	860,125,659	641,508,798	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	166,887,637	151,199,658	*United States Dollar*
Yen Jepang	7,017,768	6,810,333	*Japanese Yen*
Dolar Singapura	2,404,682	2,464,309	*Singapore Dollar*
Euro Eropa	2,310,184	1,162,954	*European Euro*
Yuan China	1,847,305	2,202,929	*Chinese Yuan*
Dolar Australia	83,002	72,228	*Australian Dollar*
Dolar Hong Kong	73,119	43,879	*Hong Kong Dollar*
Pound Sterling Inggris	56,467	32,638	*Great Britain Pound Sterling*
Franc Swiss	12,508	6,948	*Swiss Franc*
Won Korea Selatan	5,005	2,174	*South Korean Won*
Lain-lain	11,088	4,000	*Others*
	180,708,765	164,002,050	
	1,040,834,424	**805,510,848**	

Berdasarkan Undang-Undang No. 24 tanggal 22 September 2004 yang berlaku efektif sejak tanggal 22 September 2005, sebagaimana diubah dengan Peraturan Pemerintah Pengganti Undang-Undang Republik Indonesia No. 3 tanggal 13 Oktober 2008, Lembaga Penjamin Simpanan (LPS) dibentuk untuk menjamin liabilitas tertentu bank-bank umum berdasarkan program penjaminan yang berlaku, yang besaran nilai jaminannya dapat berubah jika memenuhi kriteria tertentu yang berlaku.

Based on Law No. 24 dated 22 September 2004, effective on 22 September 2005, which was amended by the Government Regulation No. 3 dated 13 October 2008, the Indonesia Deposit Insurance Corporation (LPS) was formed to guarantee certain liabilities of commercial banks under the applicable guarantee program, which the amount of guarantee can be amended if the situation complies with the valid particular criteria.

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66 Tahun 2008 tanggal 13 Oktober 2008 mengenai Besarnya Nilai Simpanan yang dijamin Lembaga Penjamin Simpanan, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000 untuk per nasabah per bank.

Based on Government Regulation No. 66 Year 2008 dated 13 October 2008 regarding The Amount of Deposit Guaranteed by Indonesia Deposit Insurance Corporation, the amount of deposits covered by LPS is up to Rp2,000 per depositor per bank.

Pada tanggal 31 Desember 2025 dan 2024, BNI adalah peserta dari program penjaminan tersebut.

As of 31 December 2025 and 2024, BNI was a participant of the above guarantee program.

22. SIMPANAN NASABAH (lanjutan) / *22. DEPOSITS FROM CUSTOMERS (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Giro	106,181,531	45,504,242	*Current accounts*
Deposito berjangka	120,741,444	29,153,150	*Time deposits*
Tabungan	264,484	104,341	*Savings accounts*
	227,187,459	74,761,733	
Mata uang asing			***Foreign currencies***
Giro	57,652,512	30,233,977	*Current accounts*
Deposito berjangka	5,924,576	7,829,496	*Time deposits*
Tabungan	43,362	8,605	*Saving accounts*
	63,620,450	38,072,078	
Total pihak berelasi	290,807,909	112,833,811	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Tabungan	273,283,007	247,265,980	*Savings accounts*
Giro	202,045,897	146,725,948	*Current accounts*
Deposito berjangka	157,609,296	172,755,137	*Time deposits*
	632,938,200	566,747,065	
Mata uang asing			***Foreign currencies***
Giro	73,618,924	83,269,361	*Current accounts*
Deposito berjangka	30,600,093	32,495,184	*Time deposits*
Tabungan	12,869,298	10,165,427	*Savings accounts*
	117,088,315	125,929,972	
Total pihak ketiga	750,026,515	692,677,037	*Total third parties*
	1,040,834,424	**805,510,848**	

c. Deposito berjangka berdasarkan jangka waktu kontrak / *c. Time deposits by contractual period*

	2025	2024	
<1 bulan	14,211,078	14,835,885	*<1 month*
1 - <3 bulan	78,748,601	64,523,187	*1 - <3 months*
3 - <6 bulan	109,776,940	78,146,147	*3 - <6 months*
6 - 12 bulan	75,695,867	44,610,394	*6 - 12 months*
>12 bulan	36,442,923	40,117,354	*>12 months*
	314,875,409	**242,232,967**	

d. Simpanan yang diblokir dan dijadikan jaminan / *d. Deposits blocked and pledged as collateral*

	2025	2024	
Giro	44,304,011	26,450,961	*Current accounts*
Tabungan	35,450,090	30,777,945	*Savings accounts*
Deposito berjangka	14,579,441	15,198,840	*Time deposits*
Total	**94,333,542**	**72,427,746**	***Total***

22. SIMPANAN NASABAH (lanjutan) / *22. DEPOSITS FROM CUSTOMERS (continued)*

e. Tingkat suku bunga dan bagi hasil per tahun / *e. Annual interest rates and profit sharing*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Dolar Singapura/ *Singapore Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang/ *Japanese Yen* %	Won Korea Selatan/ *South Korea Won* %	Pound Sterling Inggris/ Great Britain *Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	
2025	0.00 - 6.75	0.00 - 5.30	0.00 - 2.25	0.00 - 2.60	0.00 - 1.31	0.00 - 2.30	0.00 - 0.10	0.00 - 1.00	*2025*
2024	0.00 - 8.10	0.00 - 6.25	0.00 - 2.25	0.00 - 0.10	0.00 - 0.07	0.00 - 0.25	0.00 - 0.10	0.00 - 3.70	*2024*

23. SIMPANAN DARI BANK LAIN / *23. DEPOSITS FROM OTHER BANKS*

Informasi mengenai simpanan berdasarkan pihak yang berelasi diungkapkan pada Catatan 46m.

Information with respect to transactions with related parties are disclosed in Note 46m.

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025	2024	
Rupiah			***Rupiah***
Giro	1,372,125	1,481,005	*Current accounts*
Pinjaman pasar uang antar bank	550,000	5,700,000	*Interbank money market*
Deposito berjangka	45,938	101,541	*Time deposits*
Simpanan lainnya	736,462	660,371	*Other deposits*
	2,704,525	7,942,917	
Mata uang asing			***Foreign currencies***
Pinjaman pasar uang antar bank	5,879,564	6,594,527	*Interbank money market*
Giro	2,114,660	2,244,398	*Current accounts*
Deposito berjangka	700,846	729,526	*Time deposits*
Simpanan lainnya	163,188	266,336	*Other deposits*
Negotiable Certificate of Deposit	-	770,760	*Negotiable Certificate of Deposits*
	8,858,258	10,605,547	
	11,562,783	**18,548,464**	

Perincian simpanan dari bank lain berdasarkan mata uang adalah sebagai berikut:

Deposits from other banks based on currencies are as follows:

	2025	2024	
Rupiah	2,704,525	7,942,917	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	6,053,653	7,538,687	*United States Dollar*
Yen Jepang	2,445,674	2,700,683	*Japanese Yen*
Dolar Singapura	271,394	243,814	*Singapore Dollar*
Euro Eropa	56,976	79,960	*European Euro*
Dolar Hong Kong	15,373	31,027	*Hong Kong Dollar*
Pound Sterling Inggris	15,131	11,376	*Great Britain Pound Sterling*
Won Korea	57	-	*Won Korea*
	8,858,258	10,605,547	
	11,562,783	**18,548,464**	

23. SIMPANAN DARI BANK LAIN (lanjutan) / *23. DEPOSITS FROM OTHER BANKS (continued)*

b. Berdasarkan hubungan / *b. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah			***Rupiah***
Giro	2,064	22,561	*Current accounts*
Pinjaman pasar uang antar bank	-	1,000,000	*Interbank money market*
	2,064	1,022,561	
Mata uang asing			***Foreign currencies***
Pinjaman pasar uang antar bank	1,800,900	2,253,300	*Interbank money market*
Giro	1,142,368	888,836	*Current accounts*
	2,943,268	3,142,136	
Total pihak berelasi	2,945,332	4,164,697	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah			***Rupiah***
Giro	1,370,061	1,458,444	*Current accounts*
Pinjaman pasar uang antar bank	550,000	4,700,000	*Interbank money market*
Deposito berjangka	45,938	101,541	*Time deposits*
Simpanan lainnya	736,462	660,371	*Other deposits*
	2,702,461	6,920,356	
Mata uang asing			***Foreign currencies***
Pinjaman pasar uang antar bank	4,078,664	4,341,227	*Interbank money market*
Giro	972,292	1,355,562	*Current accounts*
Deposito berjangka	700,846	729,526	*Time deposits*
Simpanan lainnya	163,188	266,336	*Other deposits*
Negotiable Certificate of Deposit	-	770,760	*Negotiable Certificate of Deposit*
	5,914,990	7,463,411	
Total pihak ketiga	8,617,451	14,383,767	*Total third parties*
	11,562,783	**18,548,464**	

23. SIMPANAN DARI BANK LAIN (lanjutan) / *23. DEPOSITS FROM OTHER BANKS (continued)*

c. Berdasarkan tingkat suku bunga dan bagi hasil per tahun / *c. By annual interest rates and profit sharing*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Dolar Australia/ *Australian Dollar* %	
2025	0.00 - 4.80	0.00 - 4.90	0.00 - 1.00	0.00 - 1.31	0.00 - 1.85	4.57	*2025*
2024	0.00 - 6.90	0.00 - 5.14	-	0.00 - 0.77	0.00 - 3.28	-	*2024*

d. Simpanan yang diblokir dan dijadikan jaminan / *d. Deposits blocked and pledged as collateral*

	2025	2024	
Giro	261,946	235,002	*Current accounts*
Deposito berjangka	49,896	28,922	*Time deposits*
Tabungan	12,871	15,793	*Savings accounts*
	324,713	**279,717**	

24. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI / *24. SECURITIES SOLD UNDER AGREEMENTS TO REPURCHASE*

Pihak lawan/ *Counterparty*	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Pembelian Kembali/ *Repurchase Amount*	Beban Bunga yang Belum Diamortisasi/ *Unamortised Interest Expenses*	Nilai Bersih/ *Net Value*
		2025					
Pihak berelasi/*Related parties*							
Rupiah/*Rupiah*							
PT Bank Mandiri (Persero) Tbk	OBN	50,000	19/12/2025	02/01/2026	52,249	96	52,153
		50,000			**52,249**	**96**	**52,153**
Pihak ketiga/*Third parties*							
Rupiah/*Rupiah*							
Bank ICBC Indonesia	OBN	250,000	24/12/2025	02/01/2026	270,047	320	269,727
BPD Sulawesi Utara	OBN	150,000	31/12/2025	12/01/2026	154,654	246	154,408
Bank SMBC Indonesia	OBN	100,000	24/12/2025	07/01/2026	108,093	203	107,890
BPD Nusa Tenggara Timur	OBN	100,000	24/12/2025	02/01/2026	108,020	129	107,891
		600,000			**640,814**	**898**	**639,916**
Mata uang asing/*Foreign currencies*							
JP Morgan Chase Bank	OBN	1,219,000	13/04/2023	15/09/2026	1,358,966	139,425	1,219,541
Standard Chartered Bank Indonesia	OBN	1,000,000	12/04/2023	15/05/2027	1,223,354	168,377	1,054,977
JP Morgan Chase Bank	OBN	1,070,000	12/04/2023	15/05/2027	1,204,219	164,583	1,039,636
Bank Deutsche AG.	OBN	1,001,000	12/04/2023	15/05/2027	1,197,189	165,343	1,031,846
Standard Chartered Bank Indonesia	OBN	700,000	14/04/2023	15/04/2026	790,203	83,823	706,380
Bank Deutsche AG.	OBN	700,000	14/04/2023	15/04/2026	771,640	81,272	690,368
JP Morgan Chase Bank	OBN	805,403	16/11/2023	16/11/2028	778,392	208,604	569,788
JP Morgan Chase Bank	OBN	328,498	16/11/2023	17/04/2028	323,877	77,101	246,776
		6,823,901			**7,647,840**	**1,088,528**	**6,559,312**
		7,473,901			**8,340,903**	**1,089,522**	**7,251,381**

24. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI (lanjutan)

24. SECURITIES SOLD UNDER AGREEMENTS TO REPURCHASE (continued)

Pihak lawan/ *Counterparty*	Jenis Sekuritas/ *Type of Securities*	Nilai Nominal/ *Nominal Amount*	Tanggal Dimulai/ *Start Date*	Tanggal Jatuh Tempo/ *Maturity Date*	Nilai Pembelian Kembali/ *Repurchase Amount*	Beban Bunga yang Belum Diamortisasi/ *Unamortised Interest Expenses*	Nilai Bersih/ *Net Value*
		2024					
Rupiah/*Rupiah*							
Bank Indonesia	OBN	4,000,000	30/12/2024	06/01/2025	3,907,625	3,388	3,904,237
Bank Indonesia	OBN	1,000,000	30/12/2024	13/01/2025	945,292	2,012	943,280
Bank Indonesia	OBN	750,000	09/12/2024	06/01/2025	714,435	642	713,793
Bank Indonesia	OBN	650,000	23/12/2024	06/01/2025	630,221	559	629,662
Bank Indonesia	OBN	580,000	17/12/2024	14/01/2025	553,006	1,291	551,715
Bank Indonesia	OBN	500,000	04/12/2024	02/01/2025	483,766	87	483,679
Bank Indonesia	OBN	500,000	05/12/2024	02/01/2025	470,023	84	469,939
Bank Indonesia	OBN	500,000	19/12/2024	02/01/2025	498,191	88	498,103
Bank Indonesia	OBN	450,000	12/12/2024	09/01/2025	427,339	614	426,725
Bank Indonesia	OBN	400,000	10/12/2024	07/01/2025	386,850	417	386,433
Bank Indonesia	OBN	350,000	23/12/2024	20/01/2025	340,265	1,161	339,104
Bank Artha Graha	OBN	200,000	25/11/2024	30/01/2025	193,351	1,034	192,317
JP Morgan Chase Bank	OBN	100,000	03/12/2024	03/01/2025	93,392	33	93,359
Bank Indonesia	OBN	5,000	11/12/2024	08/01/2025	5,078	7	5,071
		9,985,000			**9,648,834**	**11,417**	**9,637,417**
Mata uang asing/*Foreign currencies*							
JP Morgan Chase Bank	OBN	1,219,000	13/04/2023	15/09/2026	1,311,697	159,890	1,151,807
JP Morgan Chase Bank	OBN	1,070,000	12/04/2023	15/05/2027	1,162,333	179,543	982,790
Deutsche Bank AG.	OBN	1,001,000	12/04/2023	15/05/2027	1,155,548	179,663	975,885
Standard Chartered Bank Indonesia	OBN	1,000,000	12/04/2023	15/05/2027	1,180,802	183,412	997,390
Standard Chartered Bank Indonesia	OBN	700,000	14/04/2023	15/04/2026	762,718	88,896	673,822
Deutsche Bank AG.	OBN	700,000	14/04/2023	15/04/2026	744,800	85,930	658,870
JP Morgan Chase Bank	OBN	777,389	16/11/2023	16/11/2028	751,317	183,169	568,148
JP Morgan Chase Bank	OBN	317,071	16/11/2023	17/04/2028	312,614	67,798	244,816
		6,784,460			**7,381,829**	**1,128,301**	**6,253,528**
		16,769,460			**17,030,663**	**1,139,718**	**15,890,945**

Tingkat suku bunga tetap tahunan: *Annual fixed interest rates:*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
Suku bunga kontrak:			*Contractual interest rate:*
2025	4.75 - 8.38	1.85 - 4.75	*2025*
2024	5.50 - 8.38	1.85 - 4.75	*2024*

25. LIABILITAS AKSEPTASI

25. ACCEPTANCE PAYABLES

a. Berdasarkan hubungan dan mata uang

a. By relationship and currency

	2025	2024	
Rupiah			***Rupiah***
Bank	652,280	1,416,042	*Banks*
Kreditur non-bank	667,491	201,263	*Non-bank creditors*
	1,319,771	1,617,305	
Mata uang asing			***Foreign currencies***
Bank	835,195	2,470,305	*Banks*
Kreditur non-bank	169,539	141,874	*Non-bank creditors*
	1,004,734	2,612,179	
	2,324,505	**4,229,484**	

25. LIABILITAS AKSEPTASI (lanjutan) / *ACCEPTANCE PAYABLES (continued)*

Perincian liabilitas akseptasi berdasarkan mata uang adalah sebagai berikut:

Acceptance payables based on currencies are as follows:

a. Berdasarkan hubungan dan mata uang (lanjutan) / ***a. By relatioship and currency** (continued)*

	2025	2024	
Rupiah	1,319,771	1,617,305	***Rupiah***
Mata uang asing			***Foreign currencies***
Dolar Amerika Serikat	879,104	2,534,029	*United States Dollar*
Euro Eropa	58,103	32,271	*European Euro*
Yuan China	52,747	29,132	*Chinese Yuan*
Yen Jepang	14,176	16,747	*Japanese Yen*
Dolar Singapura	604	-	*Singapore Dollar*
	1,004,734	2,612,179	
	2,324,505	**4,229,484**	

b. Berdasarkan hubungan / ***b. By relationship***

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	397,368	850,673	*Rupiah*
Mata uang asing	104,244	50,082	*Foreign currencies*
Total pihak berelasi	501,612	900,755	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	922,403	766,632	*Rupiah*
Mata uang asing	900,490	2,562,097	*Foreign currencies*
Total pihak ketiga	1,822,893	3,328,729	*Total third parties*
	2,324,505	**4,229,484**	

26. BEBAN YANG MASIH HARUS DIBAYAR / *ACCRUED EXPENSES*

Beban yang masih harus dibayar terdiri dari:

Accrued expenses consist of the following:

	2025	2024	
Biaya kantor	393,676	412,947	*Office expenses*
Kewajiban sebagai Bank penerbit	212,350	245,037	*Issuer Bank liabilities*
Biaya teknologi dan telekomunikasi	127,910	615,258	*Technology and telecommunication expenses*
Biaya promosi	31,692	5,418	*Sales promotion expenses*
Biaya *loyalty*	8,879	48,929	*Loyalty expenses*
Lain-lain	167,309	201,716	*Others*
	941,816	**1,529,305**	

27. PENYISIHAN / *27. PROVISIONS*

	2025	2024	
Estimasi kerugian atas komitmen dan kontinjensi	1,451,673	2,273,422	*Estimated losses from commitments and contingencies*
Penyisihan atas perkara hukum dan lainnya	11,399	9,800	*Provision for legal cases and others*
	1,463,072	**2,283,222**	

a. Perubahan cadangan atas perkara hukum adalah sebagai berikut:

a. The movements of the allowance for legal cases are as follows:

	2025	2024	
Saldo awal	9,800	7,674	*Beginning balance*
Penambahan selama tahun berjalan	1,599	2,126	*Addition during the year*
	11,399	**9,800**	

Bank saat ini masih menghadapi permasalahan hukum diantaranya dengan debitur, pemilik dana dan/atau pihak ketiga. Saat ini permasalahan hukum tersebut masih dalam proses/upaya hukum.

The Bank has a number of outstanding litigation cases, including lawsuits with debtors, fund owners and/or third parties. Currently, litigation cases are still in legal process.

Jumlah klaim terhadap Bank dan estimasi biaya penyelesaian perkara atas tuntutan hukum yang belum selesai pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp11.399 dan Rp9.800. Pada tanggal 31 Desember 2025 dan 2024, Manajemen berpendapat bahwa jumlah cadangan atas perkara hukum telah memadai.

The Bank's total potential financial exposure and estimation on settlement of legal cases arising from outstanding lawsuits as of 31 December 2025 and 2024 amounted to Rp11,399 and Rp9,800, respectively. As of 31 December 2025 and 2024, Management believes that the provision for legal cases is adequate.

b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut:

b. The movements of gross carrying amount on commitments and contingencies are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	69,174,615	3,951,661	324,704	73,450,980	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(15,190,237)	15,190,237	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya kredit tidak memburuk	18,769,941	(18,769,941)	-	-	*Lifetime ECL not credit -impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	(140,088)	(80,583)	220,671	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	(14,844,812)	(3,388,943)	(431,724)	(18,665,479)	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	57,948,535	11,155,531	50,224	69,154,290	*New financial assets originated or purchased*
Pembayaran penuh	(18,023,609)	(1,152,482)	(3,061)	(19,179,152)	*Full repayment*
Valuta asing dan perubahan lain	1,421,825	443,138	362	1,865,325	*Foreign exchange and other movements*
	99,116,170	**7,348,618**	**161,176**	**106,625,964**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali

*Including in the net measurement is repayment *)*

27. PENYISIHAN (lanjutan)

***27. PROVISIONS** (continued)*

b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

b. The movements of gross carrying amount on commitments and contingencies are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	59,283,219	6,952,682	541,230	66,777,131	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(4,414,085)	4,414,085	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya kredit tidak memburuk	5,587,210	(5,587,210)	-	-	*Lifetime ECL not credit -impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(17,941)	17,941	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	(17,975,199)	(5,043,341)	(16,566,920)	(39,585,460)	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	37,901,557	3,505,203	28,410,920	69,817,680	*New financial assets originated or purchased*
Pembayaran penuh	(12,452,274)	(361,736)	(11,458,070)	(24,272,080)	*Full repayment*
Valuta asing dan perubahan lain	1,244,187	89,919	(620,397)	713,709	*Foreign exchange and other movements*
	69,174,615	**3,951,661**	**324,704**	**73,450,980**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net measurement is repayment *)*

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	8,850,627	1,079,175	22,858	9,952,660	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(35,631)	35,631	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	-		-	-	*Lifetime ECL not credit -impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	-	-	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	10,861,904	(82,831)	(12,170)	10,766,903	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	10,631,982	267,425	-	10,899,407	*New financial assets originated or purchased*
Pembayaran penuh	(19,835,598)	(1,060,489)	(10,688)	(20,906,775)	*Full repayment*
Valuta asing dan perubahan lain	310,865	63,891	-	374,756	*Foreign exchange and other movements*
	10,784,149	**302,802**	**-**	**11,086,951**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net measurement is repayment *)*

27. PENYISIHAN (lanjutan) / ***27. PROVISIONS*** *(continued)*

b. Perubahan nilai tercatat bruto pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

b. The movements of gross carrying amount on commitments and contingencies are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	16,294,584	433,303	126,420	16,854,307	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,363,458)	1,363,458	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	1,174,065	(1,174,065)	-	-	*Lifetime ECL not credit - -impaired*
- Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	28,312	(28,312)	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih*)	14,256,127	(156,026)	23,036	14,123,137	*Net remeasurement*)
Aset keuangan baru yang diterbitkan atau dibeli	10,906,658	1,074,960	10,233	11,991,851	*New financial assets originated or purchased*
Pembayaran penuh	(33,053,635)	(488,382)	(109,206)	(33,651,223)	*Full repayment*
Valuta asing dan perubahan lain	636,286	(2,385)	687	634,588	*Foreign exchange and other movements*
	8,850,627	**1,079,175**	**22,858**	**9,952,660**	

*) Termasuk di dalam pengukuran kembali bersih adalah pembayaran kembali.

*Including in the net measurement is repayment *)*

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut:

c. The movements of estimated losses on commitments and contingencies are as follows:

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired*	Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired*	Total/*Total*	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	652,913	815,410	420,351	1,888,674	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(61,284)	61,284	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya kredit tidak memburuk	103,584	(103,584)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	213	(29,519)	29,306	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	(709,269)	(777,070)	(288,625)	(1,774,964)	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	228,607	483,297	15,773	727,677	*New financial assets originated or purchased*
Pembayaran penuh	(42,789)	(279,818)	3,063	(319,544)	*Full repayment*
Valuta asing dan perubahan lain	58,762	505,484	137	564,383	*Foreign exchange and other movements*
	230,737	**675,484**	**180,005**	**1,086,226**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

27. PENYISIHAN (lanjutan)

***27. PROVISIONS** (continued)*

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Garansi bank yang diterbitkan					***Bank guarantees issued***
Saldo awal	137,524	1,115,637	507,945	1,761,106	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(2,699)	2,699	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	53,232	(53,232)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk - bersih	-	(2,444)	2,444	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	374,867	(705,566)	(1,192,635)	(1,523,334)	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	91,537	721,691	1,099,196	1,912,424	*New financial assets originated or purchased*
Pembayaran penuh	(6,196)	(274,145)	-	(280,341)	*Full repayment*
Valuta asing dan perubahan lain	4,648	10,770	3,401	18,819	*Foreign exchange and other movements*
	652,913	**815,410**	**420,351**	**1,888,674**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

	2025				
	Kerugian kredit ekspektasian 12 bulan/ *12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	10,193	86,752	-	96,945	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(28)	28	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	-	-	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	-	-	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	19,199	77,052	-	96,251	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	25,646	68,443	-	94,089	*New financial assets originated or purchased*
Pembayaran penuh	(33,205)	(225,704)	-	(258,909)	*Full repayment*
Valuta asing dan perubahan lain	85	2,499	-	2,584	*Foreign exchange and other movements*
	21,890	**9,070**	**-**	**30,960**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

27. PENYISIHAN (lanjutan)

***27. PROVISIONS** (continued)*

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/ *12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Irrevocable letters of credit					***Irrevocable letters of credit***
Saldo awal	13,060	52,806	699	66,565	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(1,466)	1,466	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	2,474	(2,474)	-	-	*Lifetime ECL not credit - -impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	-	(12,472)	12,472	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	11,871	18,094	(47,633)	(17,668)	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	12,957	155,799	2,502	171,258	*New financial assets originated or purchased*
Pembayaran penuh	(29,289)	(126,797)	31,606	(124,480)	*Full repayment*
Valuta asing dan perubahan lain	586	330	354	1,270	*Foreign exchange and other movements*
	10,193	**86,752**	**-**	**96,945**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

	2025				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/ *Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/ *Lifetime ECL Credit-impaired***	**Total/*Total***	
Fasilitas kredit kepada nasabah yang belum ditarik					***Unused loan facilities to debtors***
Saldo awal	287,803	-	-	287,803	*Beginning balance*
Pengalihan dari:			-	-	*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(6,618)	6,618	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	-	-	-	-	*Lifetime ECL not credit - impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	(320)	-	320	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	(260,521)	(6,612)	(320)	(267,453)	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	39,111	-	-	39,111	*New financial assets originated or purchased*
Pembayaran penuh	274,938	3	-	274,941	*Full repayment*
Penghapusbukuan	(12)	-	-	(12)	*Write-offs*
Valuta asing dan perubahan lain	98	-	-	98	*Foreign exchange and other movements*
	334,479	**9**	**-**	**334,488**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

27. PENYISIHAN (lanjutan)

c. Perubahan estimasi kerugian pada komitmen dan kontinjensi adalah sebagai berikut: (lanjutan)

***27. PROVISIONS** (continued)*

c. The movements of estimated losses on commitments and contingencies are as follows: (continued)

	2024				
	Kerugian kredit ekspektasian 12 bulan/*12-month ECL*	**Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk/*Lifetime ECL Not Credit-impaired***	**Kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk/*Lifetime ECL Credit-impaired***	**Total/*Total***	
Fasilitas kredit kepada nasabah yang belum ditarik					***Unused loan facilities to debtors***
Saldo awal	337,325	62	-	337,387	*Beginning balance*
Pengalihan dari:					*Transfer from:*
- Kerugian kredit ekspektasian 12 bulan	(10,963)	10,963	-	-	*12-month ECL-*
- Kerugian kredit ekspektasian sepanjang umurnya - kredit tidak memburuk	3,316	(3,316)	-	-	*Lifetime ECL not credit - impaired*
Pengalihan dari/ke kerugian kredit ekspektasian sepanjang umurnya - kredit memburuk	(168)	-	168	-	*Transfer from/to lifetime ECL credit-impaired - net*
Pengukuran kembali bersih penyisihan kerugian*)	(280,039)	(8,216)	-	(288,255)	*Net remeasurement of loss allowance*)
Aset keuangan baru yang diterbitkan atau dibeli	38,081	176	-	38,257	*New financial assets originated or purchased*
Pembayaran penuh	199,213	331	(168)	199,376	*Full repayment*
Penghapusbukuan	(271)	-	-	(271)	*Write-offs*
Valuta asing dan perubahan lain	1,309	-	-	1,309	*Foreign exchange and other movements*
	287,803	**-**	**-**	**287,803**	

*) Termasuk di dalam pengukuran kembali bersih penyisihan kerugian adalah pembayaran kembali.

*Including in the net measurement of loss allowance, is repayment *)*

Manajemen berpendapat bahwa estimasi kerugian pada komitmen dan kontinjensi di atas telah memadai.

Management believes that the estimated losses on commitments and contingencies are adequate.

28. LIABILITAS KONTRAK ASURANSI

Asumsi signifikan

Pada tanggal 31 Desember 2025 dan 2024, asumsi-asumsi signifikan yang digunakan dalam perhitungan liabilitas kontrak asuransi adalah tingkat *lapse*, inflasi, *partial withdrawal*, tingkat pengembangan dana, dan asumsi biaya.

28. INSURANCE CONTRACT LIABILITIES

Significant assumption

As at 31 December 2025 and 2024, significant assumptions used in the calculation of insurance contract liabilities include lapse rate, inflation, partial withdrawal, fund growth rate, and expense assumption.

	31 Desember / *December* 2025	**31 Desember/ *December* 2024**	
Metode aktuaria	*PAA, GMM, VFA*	*PAA, GMM, VFA*	*Actuarial methods*
Tabel mortalitas	TMI IV (2019)	TMI IV (2019)	*Mortality tables*
Tabel morbiditas	*Munich Re basis Hospitalization (Health Insurance & Cash Plan)*	*Munich Re basis Hospitalization (Health Insurance & Cash Plan)*	*Morbidity tables*
Rasio kerugian	7% - 93%	7% - 101%	*Loss ratio*
Metode tingkat diskonto	*GMM: Locked-in VFA: Current*	*GMM: Locked-in VFA: Current*	*Discount rate method*

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *28. INSURANCE CONTRACT LIABILITIES (continued)*

Asumsi signifikan (lanjutan) / ***Significant assumption*** *(continued)*

	31 Desember/ *December* 2025	31 Desember/ *December* 2024	
Suku bunga tahunan			*Annual interest rate*
Rupiah	4.76% - 6.95%	6.88% - 7.13%	*Rupiah*
Dolar Amerika Serikat	3.95% - 5.32%	4.96% - 5.66%	*United States Dollar*
Current discount rate (dengan *Illiquidity Premium)*			*Current discount rate (with Illiquidity Premium)*
Rupiah	4.76% - 7.08%	6.88% - 7.45%	*Rupiah*
Dolar Amerika Serikat	3.95% - 5.32%	4.96% - 5.66%	*United States Dollar*

Asumsi lain yang digunakan dalam perhitungan liabilitas kontrak asuransi adalah tingkat *lapse*, inflasi, *partial withdrawal*, tingkat pengembangan dana, dan asumsi biaya.

Other assumptions used in the calculation of insurance contract liabilities include lapse rate, inflation, partial withdrawal, fund growth rate, and expense assumption.

	2025			
	Aset/ *Assets*	Liabilitas/ *Liabilities*	Jumlah/ *Total*	
Liabilitas kontrak asuransi yang tidak diukur berdasarkan PAA	(2,703)	22,211,494	22,208,791	*Insurance contracts liabilities not measured under the PAA*
Liabilitas kontrak asuransi yang diukur berdasarkan PAA	-	169,527	169,527	*Insurance contracts liabilities measured under the PAA*
	(2,703)	**22,381,021**	**22,378,318**	

	2024			
	Aset/ *Assets*	Liabilitas/ *Liabilities*	Jumlah/ *Total*	
Liabilitas kontrak asuransi yang tidak diukur berdasarkan PAA	(3,069)	19,019,846	19,016,777	*Insurance contracts liabilities not measured under the PAA*
Liabilitas kontrak asuransi yang diukur berdasarkan PAA	-	183,255	183,255	*Insurance contracts liabilities measured under the PAA*
	(3,069)	**19,203,101**	**19,200,032**	

Perubahan nilai tercatat / ***Movement in carrying amounts***

Berikut ini merupakan rekonsiliasi yang menunjukkan perubahan nilai tercatat bersih atas kontrak asuransi selama tahun keuangan akibat arus kas dan jumlah yang diakui dalam laporan laba rugi serta laporan penghasilan komprehensif lain. Entitas Anak menyajikan tabel yang menganalisis perubahan liabilitas atas sisa masa pertanggungan dan perubahan liabilitas atas kejadian klaim secara terpisah, serta merekonsiliasi perubahan tersebut dengan pos-pos terkait dalam laporan laba rugi dan laporan penghasilan komprehensif lain. Rekonsiliasi kedua disajikan untuk kontrak yang tidak diukur berdasarkan *premium allocation approach*, yang secara terpisah menganalisis perubahan estimasi nilai kini arus kas masa depan, penyesuaian risiko untuk risiko non-keuangan, dan margin jasa kontraktual.

The following reconciliations show how the net carrying amounts of insurance contracts changed during the financial year as a result of cash flows and amounts recognised in the income statement and statement of comprehensive income. Subsidiary presents a table separately analyses movements in the liabilities for remaining coverage and movements in the liabilities for incurred claims and reconciles these movements to the line items in the income statement and statement of other comprehensive income. A second reconciliation is presented for contracts not measured under the premium allocation approach, which separately analyses changes in the estimates of the present value of future cash flows, the risk adjustment for non-financial risk and the contractual service margin.

28. LIABILITAS KONTRAK ASURANSI (lanjutan)

28. INSURANCE CONTRACT LIABILITIES (continued)

Perubahan nilai tercatat (lanjutan)

***Movement in carrying amounts** (continued)*

Estimasi nilai kini arus kas masa depan dari liabilitas kontrak asuransi mencerminkan eksposur maksimal Grup terhadap risiko kredit dari aset-aset tersebut.

The estimates of the present value of the future cash flows from insurance contract liabilities represent the Group's maximum exposure to credit risk from these assets.

a. Analisis berdasarkan pertanggungan yang tersisa dan kejadian klaim atas kontrak asuransi yang tidak diukur berdasarkan *premium allocation approach:*

a. Analysis by remaining coverage and incurred claims of insurance contracts not measured under the premium allocation approach:

	2025				
	Liabilitas atas sisa masa pertanggungan/ *Liabilities for remaining coverage*				
	Tidak termasuk komponen pemulihan kerugian/ *Excluding loss-recovery component*	Komponen pemulihan kerugian/ *Loss-recovery component*	Liabilitas atas kejadian klaim/*Liabilities for incurred claims*	Jumlah/Total	
Liabilitas kontrak asuransi pada 1 Januari 2025	18,718,984	157,767	143,095	19,019,846	*Insurance contract liabilities as at 1 January 2025*
Aset kontrak asuransi pada 1 Januari 2025	(4,233)	-	1,164	(3,069)	*Insurance contract assets as at 1 January 2025*
Liabilitas/(aset) kontrak asuransi pada 1 Januari 2025	**18,714,751**	**157,767**	**144,259**	**19,016,777**	***Insurance contracts liabilities/(assets) as at 1 January 2025***
Pendapatan asuransi	(1,411,832)	598,551	-	(813,281)	*Insurance revenue*
Biaya jasa asuransi	236,328	3,694	427,960	667,982	*Insurance service expenses*
Hasil jasa asuransi	**(1,175,504)**	**602,245**	**427,960**	**(145,299)**	***Insurance services result***
(Beban)/pendapatan keuangan dari kontrak asuransi yang diterbitkan	2,089,470	(959)	1,547	2,090,058	*Finance (expenses)/income from insurance contracts issued*
Komponen investasi	(2,743,095)	-	2,738,764	(4,331)	*Investment component*
Jumlah nilai yang diakui dalam pendapatan komprehensif	**(1,829,129)**	**601,286**	**3,168,271**	**1,940,428**	***Total amount recognised in comprehensive income***
Arus kas					***Cash flows***
Premi diterima	4,788,231	-	-	4,788,231	*Premium received*
Klaim dan biaya lain yang dibayarkan yang dapat diatribusikan secara langsung	-	-	(3,170,118)	(3,170,118)	*Claims and other directly attributable expenses paid*
Arus kas akuisisi asuransi	(366,527)	-	-	(366,527)	*Insurance acquisition cash flows*
Jumlah arus kas	**4,421,704**	**-**	**(3,170,118)**	**1,251,586**	***Total cash flows***
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2025	**21,307,326**	**759,053**	**142,412**	**22,208,791**	***Insurance contract liabilities/(assets) as at 31 December 2025***
Kontrak asuransi yang merupakan liabilitas pada akhir periode	21,310,721	759,053	141,720	22,211,494	*Insurance contracts that are liabilities at the end of the period*
Kontrak asuransi yang merupakan aset pada akhir periode	(3,395)	-	692	(2,703)	*Insurance contracts that are assets at the end of the period*
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2025	**21,307,326**	**759,053**	**142,412**	**22,208,791**	***Insurance contract liabilities/(assets) as at 31 December 2025***

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *28. INSURANCE CONTRACT LIABILITIES (continued)*

Perubahan nilai tercatat (lanjutan) / ***Movement in carrying amounts** (continued)*

a. Analisis berdasarkan pertanggungan yang tersisa dan kejadian klaim atas kontrak asuransi yang tidak diukur berdasarkan *premium allocation approach:* (lanjutan) / *Analysis by remaining coverage and incurred claims of insurance contracts not measured under the premium allocation approach: (continued)*

	2024				
	Liabilitas atas sisa masa pertanggungan/ *Liabilities for remaining coverage*				
	Tidak termasuk komponen pemulihan kerugian/ *Excluding loss-recovery component*	Komponen pemulihan kerugian/ *Loss-recovery component*	Liabilitas atas kejadian klaim/*Liabilities for incurred claims*	Jumlah/Total	
Liabilitas kontrak asuransi pada 1 Januari 2024	17,305,720	183,861	164,505	17,654,086	*Insurance contract liabilities as at 1 January 2024*
Aset kontrak asuransi pada 1 Januari 2024	(22,797)	17,602	921	(4,274)	*Insurance contract assets as at 1 January 2024*
Liabilitas/(aset) kontrak asuransi pada 1 Januari 2024	**17,282,923**	**201,463**	**165,426**	**17,649,812**	***Insurance contracts liabilities/(assets) as at 1 January 2024***
Pendapatan asuransi	(963,528)	-	-	(963,528)	*Insurance revenue*
Biaya jasa asuransi	185,648	(44,365)	474,620	615,903	*Insurance service expenses*
Hasil jasa asuransi	**(777,880)**	**(44,365)**	**474,620**	**(347,625)**	***Insurance services result***
(Beban)/pendapatan keuangan dari kontrak asuransi yang diterbitkan	752,138	669	1,477	754,284	*Finance (expenses)/income from insurance contracts issued*
Komponen investasi	(2,671,777)	-	2,592,961	(78,816)	*Investment component*
Jumlah nilai yang diakui dalam pendapatan komprehensif	**(2,597,519)**	**(43,696)**	**3,069,058**	**327,843**	***Total amount recognised in comprehensive income***
Arus kas					***Cash flows***
Premi diterima	4,498,906	-	-	4,498,906	*Premium received*
Klaim dan biaya lain yang dibayarkan yang dapat diatribusikan secara langsung	-	-	(3,090,225)	(3,090,225)	*Claims and other directly attributable expenses paid*
Arus kas akuisisi asuransi	(369,559)	-	-	(369,559)	*Insurance acquisition cash flows*
Jumlah arus kas	**4,129,347**	**-**	**(3,090,225)**	**1,039,122**	***Total cash flows***
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2024	**18,714,751**	**157,767**	**144,259**	**19,016,777**	***Insurance contract liabilities/(assets) as at 31 December 2024***
Kontrak asuransi yang merupakan liabilitas pada akhir periode	18,718,984	157,767	143,095	19,019,846	*Insurance contracts that are liabilities at the end of the period*
Kontrak asuransi yang merupakan aset pada akhir periode	(4,233)	-	1,164	(3,069)	*Insurance contracts that are assets at the end of the period*
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2024	**18,714,751**	**157,767**	**144,259**	**19,016,777**	***Insurance contract liabilities/(assets) as at 31 December 2024***

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *28. INSURANCE CONTRACT LIABILITIES (continued)*

Perubahan nilai tercatat (lanjutan) / ***Movement in carrying amounts** (continued)*

b. Analisis berdasarkan komponen pengukuran kontrak reasuransi yang tidak diukur berdasarkan *premium allocation approach:* / *b. Analysis by measurement component of reinsurance contracts not measured under the premium allocation approach:*

	2025						
			Marjin jasa kontraktual/ *Contractual service margin*				
	Nilai kini arus kas masa depan /*Present value of future cash flows*	Penyesuaian risiko untuk risiko non-keuangan /*Risk adjustment for non-financial risk*	Margin jasa kontraktual /*Contractual service margin*	Kontrak dan kontrak baru yang diukur dengan pendekatan retrospektif penuh pada saat transisi/ *New contracts and contracts measured under the full retrospective approach at transition*	Kontrak yang diukur dengan pendekatan nilai wajar pada saat transisi/ *Contracts measured under the fair value approach at transition*	Jumlah/ *Total*	
Liabilitas kontrak asuransi pada 1 Januari 2025	17,108,806	363,906	1,547,133	750,506	796,627	19,019,846	*Insurance contract liabilities as at 1 January 2025*
Aset kontrak asuransi pada 1 Januari 2025	(14,280)	696	10,515	-	10,515	(3,069)	*Insurance contract assets as at 1 January 2025*
Liabilitas/(aset) kontrak asuransi pada 1 Januari 2025	**17,094,526**	**364,602**	**1,557,648**	**750,506**	**807,142**	**19,016,777**	***Insurance contracts liabilities/(assets) as at 1 January 2025***
Perubahan yang terkait dengan jasa kini							***Changes that relate to current services***
CSM diakui untuk jasa yang diterima	-	-	(323,008)	(207,359)	(115,649)	(323,008)	*CSM recognised for the services provided*
Perubahan dalam penyesuaian risiko untuk risiko non-keuangan yang telah kadaluwarsa	-	(52,369)	-	-	-	(52,369)	*Changes in risk adjustment for non-financial risk for the risk expired*
Penyesuaian pengalaman yang terkait dengan beban jasa asuransi	(11,439)	-	-	-	-	(11,439)	*Experience adjustments - relating to insurance service expenses*
	(11,439)	(52,369)	(323,008)	(207,359)	(115,649)	(386,816)	
Perubahan yang terkait dengan jasa masa depan							***Changes that relate to future services***
Perubahan estimasi yang menyesuaikan CSM	503,813	555,137	(353,731)	(326,690)	(27,041)	705,220	*Changes in estimates that adjust the CSM*
Perubahan estimasi yang mengakibatkan kerugian kontrak yang merugi atau pembalikan kerugian tersebut	79,290	19,581	3,627	3,200	427	102,498	*Changes in estimates that results in onerous contract losses or reversal of such losses*
Kontrak yang awalnya diakui pada periode berjalan	(500,557)	43,932	460,978	460,978	-	4,353	*Contracts initially recognised in the period*
Penyesuaian pengalaman-yang timbul dari premi yang diterima pada periode yang berhubungan dengan jasa masa depan	-	-	-	-	-	-	*Experience adjustments - arising from premiums received in the period that relate to future service*
	82,546	618,650	110,875	137,489	(26,614)	812,072	
Perubahan yang terkait dengan jasa masa lalu							***Changes that relate to past services***
Perubahan dalam FCF yang terkait dengan LIC	11,864	(1,779)	-	-	-	10,085	*Changes in the FCF relating to the LIC*
Penyesuaian pengalaman-yang timbul dari premi yang diterima pada periode yang berhubungan dengan jasa masa lalu	-	-	-	-	-	-	*Experience adjustments - arising from premiums received in the period that relate to past service*
	11,864	(1,779)	-	-	-	10,085	
Hasil jasa asuransi	**83,874**	**563,599**	**(212,133)**	**(69,870)**	**(142,263)**	**435,340**	***Insurance service result***
(Beban)/pendapatan keuangan dari kontrak asuransi yang diterbitkan	1,398,350	27,762	78,975	63,846	15,129	1,505,087	*Finance (expenses)/income from insurance contracts issued*
Total changes in **Jumlah nilai yang diakui dalam penghasilan komprehensif**	**1,481,321**	**592,264**	**(133,157)**	**(6,023)**	**(127,134)**	**1,940,428**	***the income statements and statement of comprehensive income***

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *28. INSURANCE CONTRACT LIABILITIES (continued)*

Perubahan nilai tercatat (lanjutan) / ***Movement in carrying amounts** (continued)*

b. Analisis berdasarkan komponen pengukuran kontrak reasuransi yang tidak diukur berdasarkan *premium allocation approach:* (lanjutan) / *b. Analysis by measurement component of reinsurance contracts not measured under the premium allocation approach: (continued)*

	2025						
			Marjin jasa kontraktual/ *Contractual service margin*				
	Nilai kini arus kas masa depan /*Present value of future cash flows*	Penyesuaian risiko untuk risiko non-keuangan /*Risk adjustment for non-financial risk*	Margin jasa kontraktual /*Contractual service margin*	Kontrak dan kontrak baru yang diukur dengan pendekatan retrospektif penuh pada saat transisi/ *New contracts and contracts measured under the full retrospective approach at transition*	Kontrak yang diukur dengan pendekatan nilai wajar pada saat transisi/ *Contracts measured under the fair value approach at transition*	Jumlah/ *Total*	
Arus kas							***Cash flows***
Premi yang diterima	4,788,231	-	-	-	-	4,788,231	*Premium received*
Klaim dan beban lainnya yang dibayarkan yang dapat diatribusikan secara langsung	(3,170,118)	-	-	-	-	(3,170,118)	*Claims and other directly attributable expenses paid*
Arus kas akuisisi asuransi	(366,527)	-	-	-	-	(366,527)	*Insurance acquisition cash flows*
Jumlah arus kas	**1,251,586**	**-**	**-**	**-**	**-**	**1,251,586**	***Total cash flows***
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2025	**19,827,433**	**956,867**	**1,424,491**	**744,484**	**680,007**	**22,208,791**	***Insurance contract liabilities/(assets) as at 31 December 2025***
Kontrak asuransi yang merupakan liabilitas pada akhir periode	19,835,440	956,201	1,419,853	744,476	675,377	22,211,494	*Insurance contracts that are liabilities at the end of the period*
Kontrak asuransi yang merupakan aset pada akhir periode	(8,007)	666	4,638	8	4,631	(2,703)	*Insurance contracts that are assets at the end of the period*
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2025	**19,827,433**	**956,867**	**1,424,491**	**744,484**	**680,007**	**22,208,791**	***Insurance contract liabilities/(assets) as at 31 December 2025***

	2024						
			Marjin jasa kontraktual/ *Contractual service margin*				
	Nilai kini arus kas masa depan /*Present value of future cash flows*	Penyesuaian risiko untuk risiko non-keuangan /*Risk adjustment for non-financial risk*	Margin jasa kontraktual /*Contractual service margin*	Kontrak dan kontrak baru yang diukur dengan pendekatan retrospektif penuh pada saat transisi/ *New contracts and contracts measured under the full retrospective approach at transition*	Kontrak yang diukur dengan pendekatan nilai wajar pada saat transisi/ *Contracts measured under the fair value approach at transition*	Jumlah/ *Total*	
Liabilitas kontrak asuransi pada 1 Januari 2024	16,038,983	358,107	1,256,996	509,325	747,671	17,654,086	*Insurance contract liabilities as at 1 January 2024*
Aset kontrak asuransi pada 1 Januari 2024	(38,661)	16,681	17,706	17,706	-	(4,274)	*Insurance contract assets as at 1 January 2024*
Liabilitas/(aset) kontrak asuransi pada 1 Januari 2024	**16,000,322**	**374,788**	**1,274,702**	**527,031**	**747,671**	**17,649,812**	***Insurance contracts liabilities/(assets) as at 1 January 2024***
Perubahan yang terkait dengan jasa kini							***Changes that relate to current services***
CSM diakui untuk jasa yang diterima	-	-	(270,188)	(159,098)	(111,090)	(270,188)	*CSM recognised for the services provided*
Perubahan dalam penyesuaian risiko untuk risiko non-keuangan yang telah kadaluwarsa	-	(54,680)	-	-	-	(54,680)	*Changes in risk adjustment for non-financial risk for the risk expired*
Penyesuaian pengalaman yang terkait dengan beban jasa asuransi	(202,742)	-	-	-	-	(202,742)	*Experience adjustments - relating to insurance service expenses*
	(202,742)	(54,680)	(270,188)	(159,098)	(111,090)	(527,610)	

28. LIABILITAS KONTRAK ASURANSI (lanjutan)

28. INSURANCE CONTRACT LIABILITIES *(continued)*

Perubahan nilai tercatat (lanjutan)

Movement in carrying amounts *(continued)*

b. Analisis berdasarkan komponen pengukuran kontrak reasuransi yang tidak diukur berdasarkan *premium allocation approach:* (lanjutan)

b. Analysis by measurement component of reinsurance contracts not measured under the premium allocation approach: (continued)

	2024						
			Marjin jasa kontraktual/ *Contractual service margin*				
	Nilai kini arus kas masa depan /*Present value of future cash flows*	Penyesuaian risiko untuk risiko non-keuangan /*Risk adjustment for non-financial risk*	Margin jasa kontraktual /*Contractual service margin*	Kontrak dan kontrak baru yang diukur dengan pendekatan retrospektif penuh pada saat transisi/ *New contracts and contracts measured under the full retrospective approach at transition*	Kontrak yang diukur dengan pendekatan nilai wajar pada saat transisi/ *Contracts measured under the fair value approach at transition*	Jumlah/ *Total*	
Perubahan yang terkait dengan jasa masa depan							***Changes that relate to future services***
Perubahan estimasi yang menyesuaikan CSM	207,833	6,025	(62,056)	(130,737)	68,681	151,802	*Changes in estimates that adjust the CSM*
Perubahan estimasi yang mengakibatkan kerugian kontrak yang merugi atau pembalikan kerugian tersebut	(3,986)	(474)	5,087	5,087	-	627	*Changes in estimates that results in onerous contract losses or reversal of such losses*
Kontrak yang awalnya diakui pada periode berjalan	(484,166)	36,668	460,262	460,262	-	12,764	*Contracts initially recognised in the period*
Penyesuaian pengalaman-yang timbul dari premi yang diterima pada periode yang berhubungan dengan jasa masa depan	-	-	-	-	-	-	*Experience adjustments - arising from premiums received in the period that relate to future service*
	(280,319)	42,219	403,293	334,612	68,681	165,193	
Perubahan yang terkait dengan jasa masa lalu							***Changes that relate to past services***
Perubahan dalam FCF yang terkait dengan LIC	54,284	(3,269)	76,500	-	76,500	127,515	*Changes in the FCF relating to the LIC*
Penyesuaian pengalaman-yang timbul dari premi yang diterima pada periode yang berhubungan dengan jasa masa lalu	-	-	-	-	-	-	*Experience adjustments - arising from premiums received in the period that relate to past service*
	54,284	(3,269)	76,500	-	76,500	127,515	
Hasil jasa asuransi	**(428,777)**	**(15,730)**	**209,606**	**175,514**	**34,091**	**(234,902)**	***Insurance service result***
(Beban)/pendapatan keuangan dari kontrak asuransi yang diterbitkan	483,859	5,545	73,341	47,961	25,380	562,744	*Finance (expenses)/income from insurance contracts issued*
Jumlah nilai yang diakui dalam penghasilan komprehensif	**55,082**	**(10,185)**	**282,947**	**223,475**	**59,471**	**327,843**	***Total changes in the income statements and statement of comprehensive income***
Aset arus kas akuisisi asuransi dan arus kas pra-pengakuan lainnya yang dihentikan pengakuannya dan perubahan lainnya							*Insurance acquisition cash flows assets and other pre-recognition cash flows derecognised and other changes*
Arus kas							***Cash flows***
Premi yang diterima	4,498,906	-	-	-	-	4,498,906	*Premium received*
Klaim dan beban lainnya yang dibayarkan yang dapat diatribusikan secara langsung	(3,090,225)	-	-	-	-	(3,090,225)	*Claims and other directly attributable expenses paid*
Arus kas akuisisi asuransi	(369,559)	-	-	-	-	(369,559)	*Insurance acquisition cash flows*
Jumlah arus kas	**1,039,122**	**-**	**-**	**-**	**-**	**1,039,122**	***Total cash flows***
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2024	**17,094,526**	**364,602**	**1,557,648**	**750,506**	**807,142**	**19,016,777**	***Insurance contract liabilities/ (assets) as at 31 December 2024***
Kontrak asuransi yang merupakan liabilitas pada akhir periode	17,108,806	363,906	1,547,133	750,506	796,627	19,019,846	*Insurance contracts that are liabilities at the end of the period*
Kontrak asuransi yang merupakan aset pada akhir periode	(14,280)	696	10,515	-	10,515	(3,069)	*Insurance contracts that are assets at the end of the period*
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2024	**17,094,526**	**364,602**	**1,557,648**	**750,506**	**807,142**	**19,016,777**	***Insurance contract liabilities/ (assets) as at 31 December 2024***

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *INSURANCE CONTRACT LIABILITIES (continued)*

Perubahan nilai tercatat (lanjutan) / ***Movement in carrying amounts** (continued)*

c. Analisis berdasarkan pertanggungan yang tersisa dan kejadian klaim atas kontrak asuransi yang diukur berdasarkan *premium allocation approach:* / *Analysis by remaining coverage and incurred claims of insurance contracts measured under the premium allocation approach:*

	2025					
	Liabilitas atas sisa masa pertanggungan/ *Liabilities for remaining coverage*		Liabilitas atas kejadian klaim/ *Liabilities for incurred claims*			
	Tidak termasuk komponen kerugian /*Excluding loss component*	Komponen kerugian/ *Loss component*	Nilai kini dari arus kas masa depan/*Present value of future cash flows*	Penyesuaian risiko untuk risiko non-keuangan/ *Risk adjustment for non-financial risk*	Jumlah/*Total*	
Liabilitas kontrak asuransi pada 1 Januari 2025	122,373	7,623	53,013	244	183,253	*Insurance contract liabilities as at 1 January 2025*
Aset kontrak asuransi pada 1 Januari 2025	-	-	-	-	-	*Insurance contract assets as at 1 January 2025*
Liabilitas/(aset) kontrak asuransi pada 1 Januari 2025	**122,373**	**7,623**	**53,013**	**244**	**183,253**	***Insurance contracts liabilities/(assets) as at 1 January 2025***
Pendapatan asuransi	(932,232)	-	-	-	(932,232)	*Insurance revenue*
Biaya jasa asuransi	211,206	(7,370)	600,604	(162)	804,277	*Insurance service expenses*
Hasil jasa asuransi	**(721,026)**	**(7,370)**	**600,604**	**(162)**	**(127,955)**	***Insurance services result***
Komponen investasi	-	-	90	-	90	*Investment component*
Jumlah nilai yang diakui dalam pendapatan komprehensif	**(721,026)**	**(7,370)**	**600,694**	**(162)**	**(127,865)**	***Total amount recognised in comprehensive income***
Arus kas						***Cash flows***
Premi diterima	911,287	-	-	-	911,287	*Premium received*
Klaim dan biaya lain yang dibayarkan yang dapat diatribusikan secara langsung	-	-	(593,555)	-	(593,555)	*Claims and other directly attributable expenses paid*
Arus kas akuisisi asuransi	(203,594)	-	-	-	(203,594)	*Insurance acquisition cash flows*
Jumlah arus kas	**707,692**	**-**	**(593,555)**	**-**	**114,137**	***Total cash flows***
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2025	**109,039**	**253**	**60,377**	**82**	**169,527**	***Insurance contract liabilities/ (assets) as at 31 December 2025***
Kontrak asuransi yang merupakan liabilitas pada akhir periode	109,039	253	60,153	82	169,527	*Insurance contracts that are liabilities at the end of the period*
Kontrak asuransi yang merupakan aset pada akhir periode	-	-	-	-	-	*Insurance contracts that are assets at the end of the period*
Liabilitas/(aset) kontrak asuransi pada 31 Desember 2025	**109,039**	**253**	**60,153**	**82**	**169,527**	***Insurance contract liabilities/ (assets) as at 31 December 2025***

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *28. INSURANCE CONTRACT LIABILITIES (continued)*

Perubahan nilai tercatat (lanjutan) / ***Movement in carrying amounts** (continued)*

c. Analisis berdasarkan pertanggungan yang tersisa dan kejadian klaim atas kontrak asuransi yang diukur berdasarkan *premium allocation approach:* (lanjutan)

c. Analysis by remaining coverage and incurred claims of insurance contracts measured under the premium allocation approach: (continued)

	2024					
	Liabilitas atas sisa masa pertanggungan/ *Liabilities for remaining coverage*		Liabilitas atas kejadian klaim/ *Liabilities for incurred claims*			
	Tidak termasuk komponen kerugian /*Excluding loss component*	Komponen kerugian/ *Loss component*	Nilai kini dari arus kas masa depan/*Present value of future cash flows*	Penyesuaian risiko untuk risiko non-keuangan/ *Risk adjustment for non-financial risk*	Jumlah/*Total*	
Liabilitas kontrak asuransi pada 1 Januari 2024	109,176	19,249	84,544	1,074	214,043	*Insurance contract liabilities as at 1 January 2024*
Aset kontrak asuransi pada 1 Januari 2024	(373)	-	-	-	(373)	*Insurance contract assets as at 1 January 2024*
Liabilitas/(aset) kontrak asuransi pada 1 Januari 2024	**108,803**	**19,249**	**84,544**	**1,074**	**213,670**	***Insurance contracts liabilities/(assets) as at 1 January 2025***
Pendapatan asuransi	(970,273)	-	-	-	(970,273)	*Insurance revenue*
Biaya jasa asuransi	187,272	(11,626)	776,035	(830)	950,851	*Insurance service expenses*
Hasil jasa asuransi	**(783,001)**	**(11,626)**	**776,035**	**(830)**	**(19,422)**	***Insurance services result***
Komponen investasi	-	-	(41)	-	(41)	*Investment component*
Jumlah nilai yang diakui dalam pendapatan komprehensif	**(783,001)**	**(11,626)**	**775,994**	**(830)**	**(19,463)**	***Total amount recognised in comprehensive income***
Arus kas						***Cash flows***
Premi diterima	982,589	-	-	-	982,589	*Premium received*
Klaim dan biaya lain yang dibayarkan yang dapat diatribusikan secara langsung	-	-	(807,523)	-	(807,523)	*Claims and other directly attributable expenses paid*
Arus kas akuisisi asuransi	(186,018)				(186,018)	*Insurance acquisition cash flows*
Jumlah arus kas	**796,571**	**-**	**(807,565)**	**-**	**(10,952)**	***Total cash flows***
Liabilitas/(aset) kontrak asuransi pada 31 December 2024	**122,373**	**7,623**	**53,015**	**244**	**183,255**	***Insurance contract liabilities/(assets) as at 31 December 2024***
Kontrak asuransi yang merupakan liabilitas pada akhir periode	122,373	7,623	53,015	244	183,255	*Insurance contracts that are liabilities at the end of the period*
Kontrak asuransi yang merupakan aset pada akhir periode	-	-	-	-	-	*Insurance contracts that are assets at the end of the period*
Liabilitas/(aset) kontrak asuransi pada 31 December 2024	**122,373**	**7,623**	**53,015**	**244**	**183,255**	***Insurance contract liabilities/(assets) as at 31 December 2024***

28. LIABILITAS KONTRAK ASURANSI (lanjutan) / *INSURANCE CONTRACT LIABILITIES (continued)*

Perubahan nilai tercatat (lanjutan) / ***Movement in carrying amounts** (continued)*

d. Kontrak asuransi yang diakui dalam periode / *Insurance contracts recognised in the period*

Di bawah ini merupakan aset dan liabilitas kontrak asuransi yang diterbitkan pada periode pelaporan dan periode komparatif, yang dipisahkan dengan informasi kontrak tidak merugi dan kontrak yang merugi:

Below is the insurance contracts assets and liabilities that is issued in the period reporting and comparative period, that is separated by the information of non-onerous contracts and onorous contracts:

	2025			2024			
	Dari kontrak tidak merugi/ *Non-onerous contracts originated*	Dari kontrak merugi/ *Onerous contracts originated*	Jumlah/ *Total*	Dari kontrak tidak merugi/ *Non-onerous contracts originated*	Dari kontrak merugi/ *Onerous contracts originated*	Jumlah/ *Total*	
Estimasi nilai kini dari arus kas keluar masa depan							***Estimates of the present value of future cash inflows***
Arus kas akuisisi asuransi	334,705	12,007	346,712	298,086	15,789	313,875	*Insurance acquisition cash flows*
Klaim dan beban lain yang dapat diatribusikan secara langsung	2,999,989	46,571	3,046,560	2,261,585	332,088	2,593,673	*Claims and other directly attributable expenses*
Estimasi nilai kini dari arus kas masuk masa depan							***Estimates of the present value of future cash outflows***
Premi diterima	(3,834,702)	(59,126)	(3,893,828)	(3,048,857)	(342,857)	(3,391,714)	*Premium received*
Penyesuaian risiko untuk risiko non-keuangan	39,030	4,902	43,932	28,924	7,744	36,668	*Risk adjustment for non-financial risk*
Marjin jasa kontraktual	460,978	-	460,978	460,262	-	460,262	*Contractual service margin*
Kenaikan aset kontrak asuransi dari kontrak yang diakui pada tahun berjalan	-	4,354	4,354	-	12,764	12,764	***Increase in insurance contract assets from contract recognised in the period***

e. Pengakuan yang diharapkan dari margin layanan kontraktual / *Expected recognition of the contractual service margin*

	Sampai dengan 1 tahun/ *Up to 1 year*	1-2 tahun/ *years*	2-3 tahun/ *years*	3-4 tahun/ *years*	4-5 tahun/ *years*	Di atas 5 tahun/ *Over 5 years*	Jumlah/ *Total*	
31 Desember 2025	236,440	193,224	163,798	135,752	109,389	585,888	1,424,491	*31 December 2025*
31 Desember 2024	285,825	230,226	185,083	143,687	106,941	605,886	1,557,648	*31 December 2024*

29. LIABILITAS LAIN-LAIN / *OTHER LIABILITIES*

	2025	2024*)	
Utang nasabah - Entitas Anak	1,012,716	204,901	*Payable to customers - Subsidiary*
Utang bunga	991,673	1,216,659	*Interest payable*
Liabilitas sewa	739,532	1,004,213	*Lease liabilities*
Setoran jaminan	583,981	715,473	*Guarantee deposits*
Term Deposit Valas Devisa Hasil Ekspor	400,200	909,368	*Foreign Exchange Term Deposit from Export Activities*
Pendapatan yang belum diakui**)	306,353	582,568	*Unearned income***)*
Utang ke pemegang polis	203,592	200,205	*Obligation to policyholders*
Rekening dalam penyelesaian	196,080	201,120	*Unsettled account*
Kewajiban pada pihak ketiga	71,301	129,420	*Liability to third parties*
Utang reasuransi dan komisi	60,531	73,770	*Reinsurance payable and commission*
Lain-lain	2,333,265	3,077,899	*Others*
	6,899,224	**8,315,596**	

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

**) Termasuk di dalam pendapatan yang belum diakui adalah klaim asuransi yang telah diterima oleh Bank atas Kredit Usaha Rakyat (KUR).

***) *Including in unearned income is insurance claim that has been received by the Bank from Kredit Usaha Rakyat (KUR).*

29. LIABILITAS LAIN-LAIN (lanjutan) / *OTHER LIABILITIES (continued)*

Term Deposit Valas Devisa Hasil Ekspor merupakan suatu instrumen dimana dana devisa hasil ekspor dari rekening khusus eksportir ditempatkan pada Bank Indonesia melalui rekening Bank sesuai mekanisme pasar.

Term Deposits of Foreign Exchange from Export Proceeds is an instrument where foreign exchange from export proceeds from exporters' special account are placed in Bank Indonesia through Bank's accounts in accordance with market mechanisms.

Jumlah beban bunga atas liabilitas sewa sebesar Rp52.653 pada tanggal 31 Desember 2025 dan Rp52.631 pada tanggal 31 Desember 2024.

The balances of interest expense from lease liabilities amounted to Rp52,653 as of 31 December 2025 and Rp52,631 as of 31 December 2024.

Analisis jatuh tempo liabilitas lain-lain terkait sewa adalah sebagai berikut:

The maturity analysis of other liabilities related to lease is as follows:

	2025	2024	
1 tahun	88,217	198,817	*1 year*
2 tahun	85,979	79,407	*2 years*
3 tahun	136,669	151,182	*3 years*
4 tahun	142,518	188,687	*4 years*
5 tahun	286,149	386,120	*5 years*
	739,532	**1,004,213**	

30. PERPAJAKAN / *TAXATION*

a. Pajak dibayar di muka / *Prepaid taxes*

	2025	2024	
Pajak penghasilan badan			*Corporate income tax*
BNI	3,065,809	-	*BNI*
Entitas Anak	24,495	18,950	*Subsidiaries*
	3,090,304	**18,950**	

b. Utang pajak / *Taxes payable*

	2025	2024	
Pajak penghasilan badan			*Corporate income tax*
BNI			*BNI*
Pasal 25	225,010	200,180	*Article 25*
Pasal 29	-	2,419	*Article 29*
	225,010	202,599	
Entitas Anak			*Subsidiaries*
Pasal 25	2,013	4,926	*Article 25*
Pasal 29	36,018	15,683	*Article 29*
Total pajak penghasilan badan	263,041	223,208	*Total corporate income tax*
Pajak lainnya			*Other taxes*
BNI	96,779	84,312	*BNI*
Entitas Anak	55,064	10,049	*Subsidiaries*
Total pajak lainnya	151,843	94,361	*Total other taxes*
	414,884	**317,569**	

30. PERPAJAKAN (lanjutan) / ***30. TAXATION*** *(continued)*

c. Beban pajak / ***c. Tax expense***

	2025	2024	
BNI			*BNI*
Kini	-	4,133,787	*Current*
Tangguhan	4,205,136	410,731	*Deferred*
Periode lalu dari hasil pemeriksaan pajak	-	313,924	*Previous year tax examination*
Pajak penghasilan - BNI	4,205,136	4,858,442	*Income tax - BNI*
Entitas Anak			*Subsidiaries*
Kini	46,015	47,820	*Current*
Tangguhan	35,272	4,799	*Deferred*
Pajak penghasilan - Entitas Anak	81,287	52,619	*Income tax - Subsidiaries*
	4,286,423	**4,911,061**	

Rekonsiliasi antara beban pajak penghasilan dengan hasil perkalian laba akuntansi sebelum pajak penghasilan dan tarif pajak yang berlaku adalah sebagai berikut:

The reconciliation between income tax expense and the theoretical tax amount on the profit before income tax is as follows:

	2025	2024	
Laba konsolidasian sebelum pajak penghasilan	24,397,463	26,580,458	*Consolidated income before income tax*
Pajak dihitung dengan tarif pajak yang berlaku	4,630,789	5,065,757	*Tax calculated at applicable tax rates*
Pendapatan yang tidak dapat dikurangkan untuk tujuan perpajakan			*Income not deductible for tax purpose*
BNI	(460,335)	(477,139)	*BNI*
Entitas Anak	115,969	8,519	*Subsidiaries*
Total dampak pajak penghasilan	(344,366)	(468,620)	*Total income tax impact*
Koreksi hasil pemeriksaan pajak penghasilan tahun sebelumnya - BNI	-	313,924	*Correction of income tax assessment on previous year - BNI*
Beban pajak	**4,286,423**	**4,911,061**	***Tax expense***

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laba rugi BNI dengan estimasi penghasilan kena pajak adalah sebagai berikut:

A reconciliation between the income before tax as shown in BNI's profit and loss and estimated taxable income is as follows:

	2025	2024	
Grup			***The Group***
Laba konsolidasian sebelum pajak penghasilan	24,397,463	26,580,458	*Consolidated income before income tax*
Rugi/(Laba) sebelum pajak penghasilan dari Entitas Anak, setelah eliminasi	157,647	(515,679)	*Loss/(Income) before income tax of Subsidiaries, after elimination*
Laba sebelum pajak penghasilan - BNI	24,555,110	26,064,779	*Income before income tax - BNI*

30. PERPAJAKAN (lanjutan) / ***30. TAXATION*** *(continued)*

c. Beban pajak (lanjutan) / ***c. Tax expense*** *(continued)*

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laba rugi BNI dengan estimasi penghasilan kena pajak adalah sebagai berikut: (lanjutan)

A reconciliation between the income before tax as shown in BNI's profit and loss and estimated taxable income is as follows: (continued)

	2025	2024	
Beda waktu			*Timing differences*
- Penyusutan aset tetap	72,349	218,674	*Depreciation of fixed assets* -
- Pembalikan cadangan kerugian penurunan nilai aset produktif pinjaman yang diberikan	(26,716,244)	(1,099,931)	*Reversal provision for impairment losses on earning assets - loans* -
- Pembentukan cadangan hukum, litigasi dan lainnya	1,599	2,126	*Provision for legal, litigation and others* -
- Laba yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	120,295	(179,124)	*Unrealised gain on trading securities and derivative transactions* -
- Pembentukan cadangan imbalan kerja	378,869	(37,058)	*Provision for allowance for employee benefits* -
- Amortisasi aset atas hak-guna	37,028	52,846	*Right-of-use of asset amortization* -
- Pembalikan cadangan kerugian penurunan nilai aset produktif selain pinjaman yang diberikan	(807,071)	(729,649)	*Reversal provision for impairment earning assets - other than loans* -
- Modifikasi arus kas kontraktual pinjaman yang diberikan	(30,499)	(24,629)	*Modification of contractual loans* -
	(26,943,674)	(1,796,745)	
Beda tetap			*Permanent differences*
- Kenikmatan karyawan	78,893	268,608	*Employees' fringe benefits* -
- Keuntungan atas reksadana	(915,877)	(917,424)	*Gain on mutual funds* -
- Laba dari cabang luar negeri	(857,011)	(881,681)	*Profit from overseas branch offices* -
- Lain-lain	(728,820)	(980,761)	*Others* -
	(2,422,815)	(2,511,258)	
(Rugi)/penghasilan kena pajak - BNI	(4,811,378)	21,756,776	*Taxable (loss)/income - BNI*

Beban pajak penghasilan tahun berjalan dan taksiran utang pajak penghasilan BNI adalah sebagai berikut:

Taxable income for the current year and the estimated corporate income tax payable of BNI are as follows:

	2025	2024	
Beban pajak penghasilan sesuai tarif pajak yang berlaku 19% x Rp21.756.776	-	4,133,787	*Income tax based on the applicable tax rates 19% x Rp21,756,776*
Beban pajak penghasilan	-	4,133,787	*Corporate income tax expense*
Pajak dibayar di muka	(3,065,809)	(3,931,188)	*Prepaid tax*
(Piutang)/utang pajak penghasilan - BNI	(3,065,809)	202,599	*Corporate income tax (receivable)/payable - BNI*

30. PERPAJAKAN (lanjutan)

c. Beban pajak (lanjutan)

Untuk tahun pajak 2025 dan 2024, berdasarkan Pasal 65 dari Peraturan Pemerintah No. 55 tahun 2022 tentang Penyesuaian Pengaturan di Bidang Pajak Penghasilan bagi Wajib Pajak Badan Dalam Negeri yang Berbentuk Perseroan Terbuka, Wajib Pajak dapat memperoleh penurunan tarif PPh sebesar 3% (tiga persen) lebih rendah dari tarif PPh Wajib Pajak Badan dalam negeri sebagaimana diatur dalam Undang-Undang Perpajakan tersebut diatas apabila memenuhi tambahan kriteria sebagai berikut:

1. Jumlah kepemilikan saham publiknya 40% (empat puluh persen) atau lebih dari keseluruhan saham yang disetor dan saham tersebut dimiliki paling sedikit oleh 300 (tiga ratus) pihak.
2. Masing-masing pihak yang dimaksud di atas hanya boleh memiliki saham kurang dari 5% (lima persen) dari keseluruhan saham yang disetor.
3. Ketentuan tersebut harus dipenuhi oleh Wajib Pajak dalam waktu paling singkat 6 (enam) bulan (183 (seratus delapan puluh tiga) hari kalender) dalam jangka waktu 1 (satu) tahun pajak.
4. Pihak-pihak yang memenuhi persyaratan 300 (tiga ratus) pihak dan 5% (lima persen) sebagaimana di atas, tidak termasuk: Wajib Pajak Perseroan Terbuka yang membeli kembali sahamnya; dan/atau yang memiliki hubungan istimewa sebagaimana diatur dalam Undang-Undang Pajak Penghasilan dengan Wajib Pajak Perseroan Terbuka (tercermin dari kepemilikan saham oleh pengendali dan/atau pemegang saham utama).

Berdasarkan Laporan Bulanan Kepemilikan Saham Nomor DE/I/2026-0028 tanggal 2 Januari 2026 dan Nomor DE/I/2025-0034 tanggal 3 Januari 2025 dari Biro Administrasi Efek, Datindo Entrycom, atas kepemilikan saham BNI selama tahun 2025 dan tahun 2024, semua kriteria untuk memperoleh fasilitas penurunan tarif pajak tersebut di atas telah terpenuhi.

Peraturan Menteri Keuangan No. PMK-136 Tahun 2024 (PMK-136) telah disahkan di Indonesia, yurisdiksi di mana perusahaan didirikan, dan berlaku mulai 1 Januari 2025.

Grup berada dalam lingkup aturan model OECD Pilar Dua dan menerapkan pengecualian dalam mengakui serta mengungkapkan informasi mengenai aset dan liabilitas pajak tangguhan yang terkait dengan pajak penghasilan Pilar Dua mulai 1 Januari 2025.

***30. TAXATION** (continued)*

***c. Tax expense** (continued)*

For the fiscal years 2025 and 2024, based on Article 65 of Government Regulation No. 55 year 2022 regarding the Adjustment of Arrangements in Income Tax for Domestic Corporate Tax Payers in the Form of Public Companies, tax payers can obtain a reduction in the PPh rate of 3% (three percent) lower than the rate of domestic corporate tax payers as regulated in the Taxation Law, if it meets the following additional criteria:

1. *The public owned 40% (forty percent) or more of the total paid up shares and those shares are owned by at least 300 (three hundred) parties.*
2. *Each party can only own less than 5% (five percent) of total paid-up shares.*
3. *The tax payer should fulfill the above mentioned criteria at least within 6 (six) months (183 (one hundred and eighty three) calendar days) in 1 (one) fiscal year.*
4. *Parties that meet the requirements of 300 (three hundred) parties and 5% (five percent) as stated above, do not include: Public Company Tax Payers who buy back their shares; and/or Those who have a special relationship as stipulated in the Income Tax Law with Public Company Tax Payers (reflected in: share ownership by the controlling party and/or major shareholder).*

Based on the Monthly Shareholding Report Number DE/I/2026-0028 dated 2 January 2026 and Number DE/I/2025-0034 dated 3 January 2025 from the Registrar, Datindo Entrycom, regarding BNI's shares during the year 2025 and year 2024, BNI has met all criteria mentioned above to obtain a facility of tax rate reduction.

The MOF Regulation no. PMK-136 Year 2024 (PMK-136) was enacted in Indonesia, the jurisdiction in which the company is incorporated, and effect from 1 January 2025.

The Group is within the scope of the OECD Pillar Two model rules and applied the exception to recognizing and disclosing information about deferred tax assets and liabilities relating to Pillar Two income taxes from 1 January 2025.

30. PERPAJAKAN (lanjutan)

c. Beban pajak (lanjutan)

Peraturan Pilar Dua telah disahkan atau secara substansial disahkan di beberapa yurisdiksi tempat Grup beroperasi. Peraturan tersebut mulai berlaku untuk tahun fiskal Grup yang berakhir setelah 31 Desember 2024. Grup termasuk dalam lingkup peraturan yang telah disahkan atau secara substansial disahkan dan telah melakukan penilaian terhadap potensi eksposur Grup terhadap pajak penghasilan Pilar Dua. Pada periode pelaporan, Grup melakukan penilaian terhadap Pilar Dua dengan asumsi bahwa Bank bertindak sebagai Entitas Induk Utama.

Berdasarkan penilaian tersebut, di beberapa yurisdiksi tempat Grup beroperasi, tarif pajak efektif di yurisdiksi tersebut berada di bawah 15%, pengakuan beban pajak penghasilan kini tambahan tidak material terhadap laporan keuangan konsolidasian Grup.

***30. TAXATION** (continued)*

***c. Tax expense** (continued)*

Pillar Two legislation has been enacted or substantially enacted in certain jurisdictions in which the Group operates. The legislation has become effective for the Group's financial year ended after 31 December 2024. The Group is in scope of the enacted or substantially enacted legislation and has performed an assessment of the Group's potential exposure to Pillar Two income taxes. At reporting period, the Group assessed Pillar Two on the assumption that the Bank acted as the Ultimate Parent Entity.

Based on the assessment, in some jurisdictions in which the Group operates, the effective tax rates in those jurisdictions are below 15%, the identified recognition of a supplemental current tax expense was immaterial to the consolidated financial statements of the Group.

d. Aset pajak tangguhan - bersih

Aset pajak tangguhan pada tanggal 31 Desember 2025 dan 2024 merupakan pengaruh beda pajak dengan rincian sebagai berikut:

d. Deferred tax assets - net

The deferred tax assets as of 31 December 2025 and 2024 represent the tax effects on the following:

	2025				
	Saldo awal/ *Beginning balance*	**Dikreditkan/ (dibebankan) ke laporan laba rugi konsolidasian/ Credited/ *(charged) to consolidated statement of profit or loss***	**Dibebankan ke ekuitas/ *Charged to equity***	**Saldo akhir/ *Ending balance***	
Rugi/(laba) yang belum direalisasi atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	204,437	-	(825,670)	(621,233)	*Unrealised loss/(gain) on financial assets at fair value through other comprehensive income*
Cadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	5,103,644	(5,076,086)	-	27,558	*Allowance for impairment losses on earning assets - loans*
Cadangan imbalan kerja	692,954	71,985	112,329	877,268	*Allowance for employee benefits*
Cadangan kerugian penurunan nilai aset produktif - selain pinjaman yang diberikan	614,888	(153,343)	-	461,545	*Allowance for impairment losses on earning assets - other than loans*
Cadangan hukum, kecurangan *(fraud)* dan lainnya	1,862	304	-	2,166	*Allowance for legal, fraud and others*
(Laba)/rugi yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(174,625)	22,856	-	(151,769)	*Unrealised (gain) loss on trading securities and derivative transactions*
Amortisasi Aset-Hak-Guna	29,399	7,035	-	36,434	*Right-of-Use Assets amortization*
Penyusutan aset tetap	(66,775)	13,746	-	(53,029)	*Depreciation of fixed assets*
Modifikasi arus kas kontraktual pinjaman yang diberikan	380,366	(5,795)	-	374,571	*Modification of contractual cash flows of loans*
Rugi pajak yang dapat dikompensasi	-	914,162	-	914,162	*Tax loss carryforward*
Aset pajak tangguhan BNI - bersih	6,786,150	(4,205,136)	(713,341)	1,867,673	***Net deferred tax assets - BNI***
Aset pajak tangguhan Entitas Anak - bersih	359,136			448,099	***Net deferred tax assets - Subsidiaries***
Aset pajak tangguhan konsolidasian - bersih	**7,145,286**			**2,315,772**	***Net consolidated deferred tax assets***

30. PERPAJAKAN (lanjutan)

d. Aset pajak tangguhan - bersih (lanjutan)

Aset pajak tangguhan pada tanggal 31 Desember 2025 dan 2024 merupakan pengaruh beda pajak dengan rincian sebagai berikut: (lanjutan)

Sesuai dengan ketentuan peralihan dalam Peraturan Menteri Keuangan Republik Indonesia Nomor 74 Tahun 2024, BNI telah melaksanakan perhitungan nilai tercatat cadangan piutang tak tertagih untuk awal tahun fiskal 2024 dan selisih lebih sebesar Rp23.732.378 diakui sebagai biaya yang dibebankan seluruhnya untuk tahun fiskal 2025. Terkait dengan hal tersebut, aset pajak tangguhan yang dimanfaatkan BNI pada tahun fiskal 2025 sebesar Rp4.509.152.

***30. TAXATION** (continued)*

***d. Deferred tax assets - net** (continued)*

The deferred tax assets as of 31 December 2025 and 2024 represent the tax effects on the following: (continued)

Based on the transitional provisions in the Regulation of the Minister of Finance of the Republic of Indonesia Number 74 of 2024, BNI has calculated the carrying value of the allowance for doubtful accounts for the beginning of the fiscal year 2024, and the excess amounting to Rp23,732,378 is recognised as an expense fully charged to the fiscal year 2025. In relation to the above, BNI utilizes deferred tax assets amounting to Rp4,509,152 in the fiscal year 2025.

	2024*)				
	Saldo awal/ *Beginning balance*	**Dikreditkan/ (dibebankan) ke laporan laba rugi konsolidasian/ Credited/ *(charged) to consolidated statement of profit or loss***	**Dibebankan ke ekuitas/ *Charged to equity***	**Saldo akhir/ *Ending balance***	
Rugi/(laba) yang belum direalisasi atas aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain	73,445	-	130,992	204,437	*Unrealised loss/(gain) on financial assets at fair value through other comprehensive income*
Cadangan kerugian penurunan nilai aset produktif - pinjaman yang diberikan	5,312,631	(208,987)	-	5,103,644	*Allowance for impairment losses on earning assets - loans*
Cadangan imbalan kerja	798,821	(7,041)	(98,826)	692,954	*Allowance for employee benefits*
Cadangan kerugian penurunan nilai aset produktif - selain pinjaman yang diberikan	822,199	(207,311)	-	614,888	*Allowance for impairment losses on earning assets - other than loans*
Cadangan hukum, kecurangan *(fraud)* dan lainnya	1,458	404	-	1,862	*Allowance for legal, fraud and others*
(Laba)/rugi yang belum direalisasi atas efek yang diperdagangkan dan transaksi derivatif	(140,591)	(34,034)	-	(174,625)	*Unrealised (gain) loss on trading securities and derivative transactions*
Amortisasi Aset-Hak-Guna	19,358	10,041	-	29,399	*Right-of-Use Assets amortization*
Penyusutan aset tetap	4,433	40,877	(112,085)	(66,775)	*Depreciation of fixed assets*
Modifikasi arus kas kontraktual pinjaman yang diberikan	385,046	(4,680)	-	380,366	*Modification of contractual cash flows of loans*
Aset pajak tangguhan BNI - bersih	7,276,800	(410,731)	(79,919)	6,786,150	***Net deferred tax assets - BNI***
Aset pajak tangguhan Entitas Anak - bersih	163,818			359,136	***Net deferred tax assets - Subsidiaries***
Aset pajak tangguhan konsolidasian - bersih	**7,440,618**			**7,145,286**	***Net consolidated deferred tax assets***

Manajemen berpendapat bahwa aset pajak tangguhan dapat dipulihkan seluruhnya.

Management believes that deferred tax assets are fully realisable.

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

31. EFEK-EFEK YANG DITERBITKAN / *31. SECURITIES ISSUED*

a. Berdasarkan jenis / *a. By type*

	2025		2024		
	Saldo/ *Balance*	Peringkat/ *Rating* *)	Saldo/ *Balance*	Peringkat/ *Rating* *)	
Global Bond, setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.168 pada tanggal 31 Desember 2025 dan Rp1.513 pada tanggal 31 Desember 2024	8,336,332	BBB*) BBB**)	8,045,987	BBB*) BBB-**)	*Global Bond, net of unamortised issuance cost amounting to Rp1,168 as of 31 December 2025 and Rp1,513 as of 31 December 2024*
Sustainability Bond, setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp3.347 pada tanggal 31 Desember 2025	4,996,653	idAAA***)	-	-	*Sustainability Bond, net of unamortised issuance cost amounting to Rp3,347as of 31 December 2025*
Green Bond, setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp177 pada tanggal 31 Desember 2025 dan Rp704 pada tanggal 31 Desember 2024	906,988	idAAA***)	4,928,510	idAAA***)	*Green Bond, net of unamortised issuance cost amounting to Rp177 as of 31 December 2025 and Rp704 as of 31 December 2024*
Long Term Notes (LTN) BP Tapera	13,217	idAAA***)	-	-	*Long Term Notes (LTN) BP Tapera*
Total	14,253,190		12,974,497		*Total*

*) *S&P* / *S&P *)*
**) *Fitch* / *Fitch **)*
***) *Pefindo* / *S&P ***)*

Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022

Pada tanggal 21 Juni 2022, BNI telah menerbitkan Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022 ("*Green Bond* I 2022") dengan nominal sebesar Rp5.000.000 yang terdiri atas 2 seri:

Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022

On 21 June 2022, BNI has issued Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022 ("Green Bond I 2022") with total amount of Rp5,000,000 which consists of 2 series:

	Nominal/ *Amount*	Kupon/ *Coupon*	Jatuh tempo/ *Maturity Date*	
Obligasi Seri A	4,000,000	6.35%	21 Juni/*June* 2025	*Obligation Serie A*
Obligasi Seri B	1,000,000	6.85%	21 Juni/*June* 2027	*Obligation Serie B*

Green Bond I 2022 ditawarkan dengan nilai 100% (seratus persen) dari jumlah pokok obligasi, dengan kupon dibayarkan setiap kuartalan, dan tercatat di Bursa Efek Indonesia (IDX) pada 22 Juni 2022. Penawaran Umum *Green Bond* I 2022 telah mendapatkan Izin Efektif OJK melalui surat OJK No. S-93/D.04/2022 tanggal 10 Juni 2022.

Green Bond I 2022 is offered with a value of 100% (one hundred percent) of the principal amount of the bond, with coupons paid quarterly, and listed on the Indonesia Stock Exchange (IDX) on 22 June 2022. The Green Bond I 2022 Public Offering has obtained OJK Effective Permission through OJK letter No. S-93/D.04/2022 dated 10 June 2022.

31. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022 (lanjutan)

Pada tanggal 31 Desember 2025, BNI *Green Bond* 2022 memiliki nilai bersih sebesar Rp906.988 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp177 (31 Desember 2024 BNI *Green Bond* 2022 memiliki nilai bersih sebesar Rp4.928.510 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp704).

Dana hasil penerbitan obligasi setelah dikurangi biaya biaya emisi, seluruhnya akan digunakan BNI untuk pembiayaan maupun pembiayaan kembali proyek-proyek dalam kategori Kegiatan Usaha Berwawasan Lingkungan (KUBL), yaitu proyek-proyek yang berkaitan dengan energi terbarukan, efisiensi energi, pengolahan sampah menjadi energi dan manajemen limbah, penggunaan sumber daya alam dan penggunaan tanah yang berkelanjutan, konservasi keanekaragaman hayati darat dan air, transportasi ramah lingkungan, pengelolaan air dan air limbah yang berkelanjutan, adaptasi perubahan iklim, gedung berwawasan lingkungan, dan pertanian berkelanjutan, dengan memperhatikan Peraturan OJK No. 60/POJK.04/2017 tentang Penerbitan dan Persyaratan Efek Bersifat Utang Berwawasan Lingkungan *(Green Bond)*.

BNI telah memperoleh rating idAAA atas *Green Bond* I 2022 dari PT Pemeringkat Efek Indonesia (PEFINDO) pada tanggal 19 Maret 2025 dan Opini Pihak Kedua yang diberikan oleh Sustainalytics pada tanggal 20 September 2024.

Wali Amanat yang ditunjuk atas Obligasi Berwawasan Lingkungan adalah PT Bank Mandiri (Persero) Tbk dengan syarat Pembatasan Keuangan dan pembatasan lain terhadap Bank (*debt covenants*) adalah sebagai berikut:

***31. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

***Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022** (continued)*

As of 31 December 2025, BNI Green Bond 2022 had a net value of Rp906,988 after deducting the unamortised issuance fee of Rp177 (31 December 2024, BNI Green Bond 2022 had a net value of Rp4,928,510 after deducting the unamortised issuance fee of Rp704).

The proceeds from the bond issuance after deducting emission costs will be entirely used by BNI to finance and refinance projects in the Environmental Based Business Activity (hereinafter abbreviated as KUBL or Kegiatan Usaha Berwawasan Lingkungan) category, namely, projects related to renewable energy, energy efficiency, waste processing into energy, and waste management, sustainable use of natural resources and land use, conservation of terrestrial and aquatic biodiversity, environmentally-friendly transportation, sustainable management of water and wastewater, adaptation to climate change, environmentally sound buildings, and sustainable agriculture, with due observance of OJK Regulation No. 60/POJK.04/2017 concerning the Issuance and Terms of Green Bonds.

BNI has obtained idAAA rating results for Green Bond I 2022 from PT Pemeringkat Efek Indonesia (PEFINDO) on 19 March 2025 and also Second-party Opinion which has given by Sustainalytics on 20 September 2024.

The Trustee appointed for the Green Bonds is PT Bank Mandiri (Persero) Tbk, with the Debt Covenants and other restrictions applicable to the Bank as follows:

31. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

Obligasi Berwawasan Lingkungan *(Green Bond)* I PT Bank Negara Indonesia (Persero) Tbk Tahun 2022 (lanjutan)

a. Mengalihkan, melepas hak, atau menjadikan jaminan utang yang diikat secara khusus lebih dari 50% dari seluruh jumlah aset Bank berdasarkan laporan keuangan konsolidasian triwulanan terakhir, baik dalam satu transaksi atau beberapa transaksi yang berdiri sendiri ataupun yang berkaitan satu sama lain dalam 1 (satu) tahun buku.

b. Melakukan penggabungan, peleburan dan/atau akuisisi atau mengizinkan atau memberikan persetujuan kepada Perusahaan Anak (jika ada) untuk melakukan penggabungan, peleburan dan/atau akuisisi yang secara material akan mempunyai akibat yang negatif terhadap kemampuan Bank untuk melakukan pembayaran kepada pemegang *Green Bond* berdasarkan Perjanjian Perwaliamanatan kecuali atas permintaan an/atau perintah dan/atau persetujuan Pemerintah Republik Indonesia dan/atau otoritas yang berwenang.

c. Mengubah bidang usaha utama Bank dan/atau Perusahaan Anak (jika ada) yang secara material akan mempunyai akibat yang negatif terhadap kemampuan Bank untuk melakukan pembayaran kepada Pemegang *Green Bond* berdasarkan Perjanjian Perwaliamanatan, kecuali atas permintaan dan/atau perintah dan/atau persetujuan Pemerintah Republik Indonesia dan/atau otoritas yang berwenang.

d. Mengurangi modal dasar dan modal disetor kecuali jika pengurangan tersebut dilakukan atas dasar permintaan/perintah dari Pemerintah Republik Indonesia dan/atau otoritas yang berwenang.

***31. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

***Green Bond I PT Bank Negara Indonesia (Persero) Tbk 2022** (continued)*

a. The Bank is prohibited from transferring, relinquishing rights to, or pledging as specifically secured debt more than 50% of the Bank's total assets, based on the most recent quarterly consolidated financial statements - either in a single transaction or in multiple related or unrelated transactions within one fiscal year.

b. The Bank is prohibited from carrying out mergers, consolidations, and/or acquisitions, or allowing or approving its Subsidiaries (if any) to do so, if such actions would materially and negatively affect the Bank's ability to make payments to Green Bond holders under the Trust Deed except when requested, ordered, or approved by the Government of the Republic of Indonesia and/or other relevant authorities.

c. The Bank is prohibited from changing its primary line of business and/or that of its Subsidiaries (if any), if such changes would materially and negatively impact the Bank's ability to fulfill payment obligations to Green Bond holders under the Trust Deed - except upon request, order, or approval by the Government of the Republic of Indonesia and/or other relevant authorities.

d. The Bank is prohibited from reducing its authorized or paid-up capital, unless such reduction is conducted at the request or instruction of the Government of the Republic of Indonesia and/or the relevant authorities.

31. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

BNI *Sustainability Bond* 2025

Obligasi Berlandaskan Keberlanjutan *(Sustainability Bond)* Berkelanjutan I PT Bank Negara Indonesia (Persero) Tbk Tahap I Tahun 2025

Pada tanggal 4 Juli 2025, BNI telah menerbitkan Obligasi Berlandaskan Keberlanjutan *(Sustainability Bond)* Berkelanjutan I PT Bank Negara Indonesia (Persero) Tbk Tahap I Tahun 2025 ("*Sustainability Bond* I Tahap I 2025") dengan nominal sebesar Rp5.000.000 yang terdiri atas 2 seri:

***31. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

BNI Sustainability Bond 2025

Sustainability Bond I PT Bank Negara Indonesia (Persero) Tbk Phase I 2025

On 4 July 2025, BNI has issued Sustainability Bond I PT Bank Negara Indonesia (Persero) Tbk Phase I 2025 ("Sustainability Bond I Phase I 2025") with total amount of Rp5,000,000 which consists of 2 series:

	Nominal/ *Amount*	Kupon/ *Coupon*	Jatuh tempo/ *Maturity Date*	
Obligasi Seri A	3,500,000	6.60%	04 Juli/*July* 2028	*Obligation Serie A*
Obligasi Seri B	1,500,000	6.65%	04 Juli/*July* 2030	*Obligation Serie B*

Sustainability Bond I Tahap I 2025 ditawarkan dengan nilai 100% (seratus persen) dari jumlah pokok obligasi, dengan kupon dibayarkan setiap kuartalan, dan tercatat di Bursa Efek Indonesia (IDX) pada 7 Juli 2025. Penawaran Umum *Sustainability Bond* I Tahap I 2025 telah mendapatkan Izin Efektif OJK melalui surat OJK No. S-47/D.04/2025 tanggal 25 Juni 2025.

Sustainability Bond I Phase I 2025 is offered with a value of 100% (one hundred percent) of the principal amount of the bond, with coupons paid quarterly, and listed on the Indonesia Stock Exchange (IDX) on 7 July 2025. The Sustainability Bond I Phase I *2025 Public Offering has obtained OJK Effective Permission through OJK letter No.* S-47/D.04/2025 *dated 25 June 2025.*

Pada tanggal 31 Desember 2025, BNI *Sustainability Bond* I Tahap I 2025 memiliki nilai bersih sebesar Rp4.996.653 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp3.347.

As of 31 December 2025, BNI Sustainability Bond I Phase I 2025 had a net value of Rp4,996,653 after deducting the unamortised issuance fee of Rp3,347.

Dana hasil Penawaran Umum Obligasi Keberlanjutan setelah dikurangi biaya-biaya emisi seluruhnya akan digunakan untuk penyaluran pembiayaan baru ataupun pembiayaan yang sudah ada baik langsung atau pun tidak langsung atas kegiatan-kegiatan yang termasuk dalam kategori Kegiatan Usaha Berwawasan Lingkungan (KUBL) dan Kegiatan Usaha Berwawasan Sosial (KUBS) sebagaimana diatur dalam POJK No. 18 Tahun 2023.

The proceeds from the Public Offering of the Sustainability Bond, after deducting all issuance costs, will be used to finance or refinance, directly or indirectly, new or existing projects and/or activities that fall within the categories of Environmentally Sustainable Business Activities (KUBL) and Socially Sustainable Business Activities (KUBS) as stipulated under OJK Regulation No. 18 of 2023.

31. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

BNI telah memperoleh rating idAAA atas *Sustainability Bond* I Tahap I 2025 dari PT Pemeringkat Efek Indonesia (PEFINDO) pada tanggal 17 Maret 2025 dan Opini Pihak Kedua yang diberikan oleh *Sustainalytics* pada tanggal 13 Maret 2025.

Wali Amanat yang ditunjuk atas *Sustainability Bond* I Tahap I 2025 adalah PT Bank Rakyat Indonesia (Persero) Tbk dengan syarat Pembatasan Keuangan dan pembatasan lain terhadap Bank (*debt covenants*) adalah sebagai berikut:

a. Mengurangi modal dasar, modal ditempatkan, dan modal disetor kecuali dalam hal pengurangan tersebut dilakukan berdasarkan permintaan dan/atau perintah dari Pemerintah Republik Indonesia dan/atau otoritas yang berwenang (termasuk tetapi tidak terbatas pada OJK, Bank Indonesia atau Menteri Keuangan Republik Indonesia.

b. Melakukan penggabungan dan/atau pemisahan dan/atau peleburan dengan perusahaan lain yang menyebabkan bubarnya Emiten, yang secara material akan berdampak negatif terhadap kelangsungan usaha Emiten atau kemampuan Emiten dalam pemenuhan kewajiban Emiten terhadap Obligasi, kecuali atas permintaan dan/atau perintah dari Republik Indonesia dan/atau otoritas yang berwenang yang dilakukan sesuai dengan peraturan perundang-undangan yang berlaku, termasuk tetapi tidak terpatas pada peraturan OJK; dan/atau sepanjang semua syarat dan kondisi Obligasi dalam Perjanjian – Perwaliamanatan dan dokumen lain yang berkaitan tetap berlaku dan mengikat sepenuhnya perisahaan penerus (*surviving company*) dan penggabungan, pemisahan, peleburan dan/atau akuisisi tersebut disetujui oleh Bank Indonesia atau OJK.

c. Melakukan kegiatan usaha selain yang disebutkan dalam anggaran dasar Emiten pada saat ditandatanganinya Perjanjian Perwaliamanatan.

***31. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

BNI has obtained idAAA rating results for Sustainability Bond I Tahap I 2025 from PT Pemeringkat Efek Indonesia (PEFINDO) on 17 March 2025 and also Second-party Opinion which has given by Sustainalytics on 13 March 2025.

The appointed Trustee for the Sustainability Bond I Phase I 2025 is PT Bank Rakyat Indonesia (Persero) Tbk, with the financial covenants and other restrictions on the Bank (debt covenants) as follows:

a. Reducing the authorized capital, issued capital, and paid-up capital, except in the event that such reduction is carried out pursuant to a request and/or instruction from the Government of the Republic of Indonesia and/or the relevant authorities (including but not limited to OJK, Bank Indonesia, or the Minister of Finance of the Republic of Indonesia).

b. Merging and/or demerging and/or consolidating with another company that results in the dissolution of the Issuer, which would materially and adversely affect the Issuer's business continuity or its ability to fulfill its obligations under the Bonds, except pursuant to a request and/or instruction from the Government of the Republic of Indonesia and/or the relevant authorities and carried out in accordance with the prevailing laws and regulations, including but not limited to OJK regulations; and/or provided that all terms and conditions of the Bonds under the Trust Deed and other related documents remain valid and binding in full upon the surviving company, and such merger, demerger, consolidation and/or acquisition has been approved by Bank Indonesia or OJK.

c. Engaging in any business activities other than those expressly stipulated in the Issuer's Articles of Association as in effect on the date of execution of the Trust Deed.

31. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

Wali Amanat yang ditunjuk atas *Sustainability Bond* I Tahap I 2025 adalah PT Bank Rakyat Indonesia (Persero) Tbk dengan syarat Pembatasan Keuangan dan pembatasan lain terhadap Bank (*debt covenants*) adalah sebagai berikut: (lanjutan)

d. Melakukan penjualan atau pengalihan aktiva milik Emiten kepada pihak manapun, baik seluruhnya atau sebagian besar, yang melebihi 50% (lima puluh persen) dari seluruh aktiva milik Emiten berdasarkan laporan keuangan terakhir yang telah diaudit oleh kantor akuntan publik.

Obligasi Senior BNI *Global Bond* 2024

Pada tanggal 5 April 2024, BNI telah menerbitkan Obligasi Senior denominasi USD, BNI *Global Bond* 2024 sebesar nilai nominal USD500.000.000 (nilai penuh) dengan tenor 5 tahun.

BNI *Global Bond* 2024 ditawarkan dengan nilai 100% (seratus persen) dari nilai pokok obligasi dengan kupon sebesar 5,28% per tahun yang dibayarkan setiap semester dan tercatat pada *Singapore Exchange* (SGX) dengan merujuk pada ketentuan *Regulation S* ("Reg S") berdasarkan *US Securities Act*.

Pada tanggal 31 Desember 2025, BNI *Global Bond* 2024 memiliki nilai bersih sebesar Rp8.336.332 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.168 (31 Desember 2024 memiliki nilai bersih sebesar Rp8.045.987 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp1.513).

Dana hasil penerbitan BNI *Global Bond* 2024 akan digunakan untuk keperluan pembiayaan dan pendanaan umum BNI dalam rangka pengembangan usaha serta peningkatan komposisi struktur dana jangka panjang BNI.

***31. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

The appointed Trustee for the Sustainability Bond I Phase I 2025 is PT Bank Rakyat Indonesia (Persero) Tbk, with the financial covenants and other restrictions on the Bank (debt covenants) as follows: (continued)

d. Effecting the sale or transfer of the Issuer's assets, whether in whole or in substantial part, to any party, where such sale or transfer represents more than 50% (fifty percent) of the Issuer's total assets as reflected in the most recent financial statements audited by a public accounting firm.

Senior Bond BNI Global Bond 2024

On 5 April 2024, BNI has issued USD denominated Senior Bond, BNI Global Bond 2024 with total nominal value of USD500,000,000 (full amount) with a tenor of 5 years.

BNI Global Bond 2024 was offered with a value of 100% (one hundred percent) of the principal amount of the bond, with coupons of 5.28% (five point twenty-eight percent) per annum which paid semi-annually and listed on the Singapore Exchange (SGX) by referring to the Regulation S ("Reg S") under the US Securities Act.

As of 31 December 2025, the net value of BNI Global Bond 2024 was Rp8,336,332 after deducting unamortised issuance cost amounted Rp1,168 (31 December 2024 BNI Global Bond 2024 had a net value Rp8,045,987 after deducting unamortised issuance cost amounted Rp1,513).

The proceeds from the issuance of BNI Global Bond 2024 will be allocated for BNI's financing and general funding purposes to support business expansion and optimizing the composition of the long-term fund structure.

31. EFEK-EFEK YANG DITERBITKAN (lanjutan)

a. Berdasarkan jenis (lanjutan)

Obligasi Senior BNI *Global Bond* 2024 (lanjutan)

Per tanggal 31 Desember 2025, BNI telah memperoleh hasil pemeringkatan atas BNI *Global Bond 2024* dari S&P dan Fitch dengan peringkat masing-masing BBB dan BBB. Pada tanggal 30 April 2025, Fitch menaikkan peringkat BNI *Global Bond 2024* menjadi BBB. Per tanggal 31 Desember 2024, BNI memperoleh hasil pemeringkatan atas BNI *Global Bond 2024* dari S&P dan Fitch dengan peringkat masing-masing BBB dan BBB-.

***Long Term Notes* yang Dilakukan Tanpa Melalui Penawaran Umum PT Bank Negara Indonesia (Persero) Tbk**

	Nominal/ *Amount*	Kupon/ *Coupon*	Jatuh tempo/ *Maturity Date*	
Long Term Notes yang Dilakukan Tanpa Melalui Penawaran Umum BNI I Tahun 2024	14.036	0.55%	7 November 2037	*Long-Term Notes Conducted Without Going Through Public Offering of BNI I Year 2024*

Pada tanggal 7 Februari 2025, PT Bank Negara Indonesia (Persero) Tbk ("BNI") menerbitkan *Long Term Notes* (LTN) yang Dilakukan Tanpa Melalui Penawaran Umum PT Bank Negara Indonesia (Persero) Tbk I Tahun 2024 dengan nominal Rp14.036.333.250 (nilai penuh) dengan bunga sebesar 0,55% per tahun dan cicilan pokok dibayarkan setiap 3 (tiga) bulan sejak LTN diterbitkan. Penerbitan LTN tidak dilakukan pemeringkatan khusus untuk LTN dan tidak menggunakan Jasa Agen Pemantau.

Penerimaan hasil penerbitan *Long Term Notes* (LTN) ini dipergunakan seluruhnya khusus untuk pembiayaan maupun membiayai kembali kredit Perumahan Peserta Tapera sebagaimana dimaksud pada Undang-Undang No.4 Tahun 2016 tentang Tabungan Perumahan Rakyat, Peraturan Pemerintah Republik Indonesia No 21 Tahun 2024 tentang Penyelenggaraan Tabungan Perumahan Rakyat, Peraturan Badan Pengelola Tabungan Perumahan Rakyat Nomor 2 Tahun 2023 tentang Perubahan Kedua Atas Peraturan Badan Pengelolaan Rakyat Nomor 6 Tahun 2021 Tentang Pembiayaan Perumahan bagi Peserta Tabungan Perumahan Rakyat serta Perjanjian Kerjasama dan Kesepakatan antara Badan Pengelola Tabungan Perumahan Rakyat dan PT Bank Negara Indonesia (Persero) Tbk ("BNI") yang berlaku.

***31. SECURITIES ISSUED** (continued)*

***a. By type** (continued)*

***Senior Bond BNI Global Bond 2024** (continued)*

As of 31 December 2025, BNI received ratings for BNI Global Bond 2024 from S&P and Fitch with ratings of BBB and BBB, respectively. On 30 April 2025, Fitch upgraded the rating of Tier 2 BNI global Bond to BBB. As of 31 December 2024, BNI obtained the rating of BNI Global Bond 2024 from S&P and Fitch with BBB and BBB- rating, respectively.

Long Term Note Conducted Without Going Through Public Offering of PT Bank Negara Indonesia (Persero) Tbk

On 7 February 2025, PT Bank Negara Indonesia (Persero) Tbk ("BNI") issued Long Term Note Conducted Without Going Through Public Offering of PT Bank Negara Indonesia (Persero) Tbk I year 2024 with a nominal value of Rp14,036,333,250 (full amount) with an interest of 0.55% per annum and the principal installments paid every 3 (three) months since the LTN was issued. The issuance was not assigned a specific credit rating and did not involve the engagement of a Monitoring Agent.

The proceeds from the issuance of this Long Term Notes (LTN) were entirely allocated for the financing or refinancing of housing loans for Tapera Participants, as stipulated in Law No.4 of 2016 concerning People's Housing Savings, Government Regulation of the Republic of Indonesia No. 21 of 2024 concerning the Implementation of People's Housing Savings, Regulation of the People's Housing Savings Management Agency Number 2 of 2023 concerning the Second Amendment to the Regulation of the People's Management Agency Number 6 of 2021 concerning the Implementation of People's Housing Financing for People's Housing Savings Participants and the agreements between Badan Pengelola Tabungan Perumahan Rakyat and PT Bank Negara Indonesia (Persero) Tbk ("BNI").

31. EFEK-EFEK YANG DITERBITKAN (lanjutan) / *31. SECURITIES ISSUED (continued)*

b. Berdasarkan mata uang / *b. By currency*

	2025	2024	
Mata uang asing			***Foreign currencies***
Global Bond, setelah dikurangi diskonto yang belum diamortisasi sebesar Rp1.168 pada tanggal 31 Desember 2025 dan sebesar Rp1.513 pada tanggal 31 Desember 2024	8,336,332	8,045,987	*Global Bond, net of unamortised discount cost of Rp1,168 as of 31 December 2025 and Rp1,513 as of 31 December 2024*
Rupiah			***Rupiah***
Sustainabilitiy Bond, setelah dikurangi diskonto yang belum diamortisasi sebesar Rp3.347 pada tanggal 31 Desember 2025	4,996,653	-	*Sustainability Bond, net of unamortised discount cost of Rp3,347 as of 31 December 2025*
Green Bond, setelah dikurangi diskonto yang belum diamortisasi sebesar Rp177 pada tanggal 31 Desember 2025 dan sebesar Rp704 pada tanggal 31 Desember 2024	906,988	4,928,510	*Green Bond, net of unamortised discount cost of Rp177 as of 31 December 2025 and Rp704 as of 31 December 2024*
LTN yang diterbitkan	13,217	-	*Long Term Issued*
	14,253,190	**12,974,497**	

c. Berdasarkan hubungan / *c. By relationship*

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	1,885,528	1,891,832	*Rupiah*
Pihak ketiga			***Third parties***
Mata uang asing	8,336,332	8,045,987	*Foreign currencies*
Rupiah	4,031,330	3,036,678	*Rupiah*
	12,367,662	**11,082,665**	
	14,253,190	**12,974,497**	

Informasi mengenai efek-efek yang diterbitkan kepada pihak-pihak berelasi diungkapkan pada Catatan 46n.

Information related to securities issued to related parties are disclosed in Note 46n.

d. Tingkat suku bunga per tahun / *d. Annual interest rates*

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	
2025	0.55 - 6.85	5.28	*2025*
2024	6.35 - 6.85	5.28	*2024*

32. PINJAMAN YANG DITERIMA / *32. BORROWINGS*

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	2025	2024	
Rupiah			***Rupiah***
Kredit likuiditas untuk kredit koperasi primer kepada anggotanya	914	914	*Liquidity loan for member of primary cooperatives*
Pinjaman penerusan	53	53	*Two step loans*
Lain-lain	3,062,637	2,910,116	*Others*
	3,063,604	2,911,083	
Mata uang asing			***Foreign currencies***
Pinjaman bilateral	33,681,190	35,115,128	*Bilateral loans*
Bankers acceptance	1,812,322	4,171,560	*Bankers acceptance*
Pinjaman penerusan	53,744	48,504	*Two step loans*
Lain-lain	429,527	685,169	*Others*
	35,976,783	40,020,361	
	39,040,387	**42,931,444**	

Pinjaman bilateral

BNI memiliki pinjaman bilateral sebagai salah satu strategi pendanaan Bank untuk menjaga komposisi pendanaan jangka pendek dan jangka panjang. Termasuk di dalam pinjaman bilateral adalah fasilitas pinjaman di bawah ini:

a) BNI, melalui BNI cabang Singapura dan London memiliki pinjaman bilateral luar negeri dengan konsorsium bank yang terdiri dari Bank of China (Hong Kong) Limited, China Construction Bank (Asia) Corporation Limited, China Construction Bank Corporation Singapore Branch, The Hong Kong and Shanghai Banking Corporation Limited Singapore Branch, CTBC Bank Co., LTD, Oversea-Chinese Banking Corporation Limited, dan United Overseas Bank Limited sebesar USD825.000.000 (nilai penuh) dengan jangka waktu pinjaman selama 5 tahun dengan tingkat suku bunga *Term* SOFR ditambah margin tertentu per tahun dan akan jatuh tempo pada tanggal 27 September 2030. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut sebesar USD825.000.000 (nilai penuh) atau ekuivalen Rp13.756.875.

Bilateral loans

BNI has bilateral loan which is one of the Bank's strategy to maintain funding profile between short term and long term funding. Bilateral loans include the following borrowing facilities:

a. BNI, through Singapore and London branches, has offshore bilateral loan with consortium of banks consisting Bank of China (Hong Kong) Limited, China Construction Bank (Asia) Corporation Limited, China Construction Bank Corporation Singapore Branch, The Hong Kong and Shanghai Banking Corporation Limited Singapore Branch, CTBC Bank Co., LTD, Oversea-Chinese Banking Corporation Limited, dan United Overseas Bank Limited amounting to USD825,000,000 (full amount) with tenure of 5 years and with interest of Term SOFR plus a certain margin per annum and will mature on 27 September 2030. As of 31 December 2025, the outstanding loan balance under this facility amounted to USD825,000,000 (full amount) or equivalent to Rp13,756,875.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

b) Pada tanggal 22 November 2023, BNI memperoleh fasilitas pinjaman bilateral dalam negeri dengan MUFG Bank, Ltd. senilai USD200.000.000 (nilai penuh) dengan jangka waktu 3 tahun. Tingkat suku bunga pinjaman adalah suku bunga tetap 6% per tahun untuk tahun pertama, dan selanjutnya menjadi tingkat suku bunga mengambang dengan menggunakan SOFR 3 bulan ditambah margin tertentu per tahun. Fasilitas ini akan jatuh tempo pada tanggal 20 November 2026. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut sebesar USD200.000.000 (nilai penuh) atau ekuivalen Rp3.335.000 (31 Desember 2024: USD200.000.000 (nilai penuh) atau ekuivalen Rp3.219.000).

Selama periode pinjaman, BNI memiliki kewajiban untuk memenuhi persyaratan-persyaratan penting (*financial covenants*) dalam perjanjian pinjaman, antara lain:

- Rasio *Non-Performing Loan* (NPL) maksimum 5%.
- Nilai *Capital Adequacy Ratio* (CAR) minimum 9% atau sesuai dengan ketentuan regulasi yang berlaku.
- Nilai Rasio Modal Inti (*Tier 1 Ratio*) minimum 6%.
- Nilai Rasio Modal Inti Utama (*Core Tier 1 Ratio*) minimum 5%.
- Rasio *Return on Average Assets* minimum 0,6%, dengan ketentuan bahwa jika nilai *Capital Adequacy Ratio* (CAR) sama dengan atau lebih besar dari 12,5%.

Pada tahun yang berakhir pada 31 Desember 2025 dan 2024, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

c) Pada tanggal 16 Oktober 2024, BNI memperoleh fasilitas pinjaman bilateral tambahan dengan MUFG Bank, Ltd. senilai USD100.000.000 (nilai penuh) dengan jangka waktu 4 tahun dihitung dari tanggal penarikan. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Penarikan atas pinjaman ini dilakukan pada tanggal 18 Oktober 2024 dan akan jatuh tempo pada tanggal 18 Oktober 2028. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut sebesar USD 100.000.000 (nilai penuh) atau ekuivalen Rp1.667.500

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

b) On 22 November 2023, BNI obtained onshore bilateral loan with MUFG Bank, Ltd. amounting to USD200,000,000 (full amount) with a tenure of 3 years. Interest rate of the borrowing is a fixed interest rate of 6% per annum for the first year, and then a floating interest rate using 3-month SOFR plus a certain margin per year. This loan facility will mature on 20 November 2026. As of 31 December 2025, the outstanding loan balance under this facility amounted to USD200,000,000 (full amount) or equivalent to Rp3,335,000 (31 December 2024: USD200,000,000 (full amount) or equivalent to Rp3,219,000).

During the loan period, BNI has to comply with the important financial covenants in the loan agreement, which include the following:

- *Non-Performing Loan (NPL) ratio maximum of 5%.*
- *Capital Adequacy Ratio (CAR) minimum 9% or according to the applicable regulation.*
- *Tier 1 Ratio minimum of 6%.*
- *Core Tier 1 Ratio minimum of 5%.*
- *Return on Average Assets ratio minimum of 0.6%, provided that Capital Adequacy Ratio (CAR) is equal to or greater than 12.5%.*

During the the year ended 31 December 2025 and 2024, the Bank has fulfilled the terms required set forth in the agreements.

c) On 16 October 2024, BNI obtained an additional bilateral loan facility with MUFG Bank, Ltd. worth USD100,000,000 (full amount) with a term of 4 years calculated from the drawdown date. The interest rate of the loan is based on the SOFR floating interest rate, plus a certain margin. The drawdown of this loan was approved on 18 October 2024 and will mature on 18 October 2028. As of 31 December 2025, the balance of the loan facility amounted to USD100.000.000 (full amount) or equivalent to Rp1,667,500.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

Selama periode pinjaman, BNI memiliki kewajiban untuk memenuhi persyaratan-persyaratan penting *(financial covenants)* dalam perjanjian pinjaman, antara lain:

- Rasio *Non-Performing Loan* (NPL) Neto maksimum 5%.
- Nilai *Capital Adequacy Ratio* (CAR) minimum 9,9% atau sesuai dengan ketentuan regulasi yang berlaku.

Pada tahun yang berakhir pada 31 Desember 2025 dan 2024, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

d) Pada tanggal 8 November 2024, BNI memperoleh fasilitas pinjaman dengan konsorsium bank yang terdiri dari Bank of America, CIMB Bank Berhad, CTBC Bank Co.,LTD., DBS Bank LTD., Oversea-Chinese Banking Corporation Limited, dan The Hongkong and Shanghai Banking Corporation Limited sebesar USD600.000.000 (nilai penuh) dengan jangka waktu pinjaman selama 4 tahun dengan tingkat suku bunga mengambang SOFR ditambah margin tertentu per tahun. Penarikan atas pinjaman ini dilakukan pada tanggal 20 November 2024 dan akan jatuh tempo pada 20 Agustus 2028. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut setelah dikurangi biaya yang belum diamortisasi masing-masing sebesar USD600.000.000 (nilai penuh) atau ekuivalen Rp10.005.000.

Selama periode pinjaman, BNI memiliki kewajiban untuk memenuhi persyaratan-persyaratan penting *(financial covenants)* dalam perjanjian pinjaman, antara lain:

- Rasio *Non-Performing Loan* (NPL) Neto maksimum 5%.
- Nilai *Capital Adequacy Ratio* (CAR) minimum 9,9% atau sesuai dengan ketentuan regulasi yang berlaku.

Pada tahun yang berakhir pada 31 Desember 2025 dan 2024, Bank telah memenuhi persyaratan penting yang dipersyaratkan dalam perjanjian ini.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

During the loan period, BNI has to comply with the important financial covenants in the loan agreement, which include the following:

- *Non-Performing Loan (NPL) Net ratio maximum of 5%.*
- *Capital Adequacy Ratio (CAR) minimum 9.9% or according to the applicable regulation.*

During the the year ended 31 December 2025 and 2024, the Bank has fulfilled the terms required set forth in the agreements.

d) On 8 November 2024, BNI obtained a loan facility with a consortium of banks consisting of Bank of America, CIMB Bank Berhad, CTBC Bank Co., LTD., DBS Bank LTD., Oversea-Chinese Banking Corporation Limited, and The Hongkong and Shanghai Banking Corporation Limited amounting to USD600,000,000 (full amount) with a loan term of 4 years and SOFR floating interest rate plus a certain margin per year. The withdrawal of this loan was approved on 20 November 2024 and will mature on 20 August 2028. As of 31 December 2025, the balance of the loan facility after deducting unamortized costs amounted to USD600,000,000 (full amount) or equivalent to Rp10,005,000.

During the loan period, BNI has to comply with the important financial covenants in the loan agreement, which include the following:

- *Non-Performing Loan (NPL) Net ratio maximum of 5%.*
- *Capital Adequacy Ratio (CAR) minimum 9.9% or according to the applicable regulation.*

During the the year ended 31 December 2025 and 2024, the Bank has fulfilled the terms required set forth in the agreements.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

e) BNI, melalui BNI cabang Singapore memperoleh fasilitas pinjaman bilateral luar negeri dengan OCBC Singapore senilai USD20.000.000 (nilai penuh) dengan jangka waktu 1 tahun. Penarikan atas pinjaman ini dilakukan pada tanggal 18 Maret 2025 dan akan jatuh tempo pada tanggal 13 Maret 2026. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu yang akan dibayarkan sepenuhnya saat jatuh tempo. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut sebesar USD20.000.000 (nilai penuh) atau ekuivalen Rp333.500.

f) BNI, melalui BNI cabang Tokyo memperoleh fasilitas pinjaman bilateral luar negeri dengan MUFG Bank, Ltd. dengan maksimum fasilitas USD100.000.000 (nilai penuh). Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 30 Desember 2025 sebesar USD10.000.000. Fasilitas ini memiliki jatuh tempo maksimal 3 bulan sejak tanggal penarikan pinjaman, yaitu pada tanggal 30 Maret 2026. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut adalah sebesar USD10.000.000 (nilai penuh) atau ekuivalen Rp166.750.

g) BNI, melalui BNI cabang Singapura memperoleh fasilitas pinjaman bilateral luar negeri dengan Australia and New Zealand Banking Group Limited sebesar AUD72.881.130 (nilai penuh) dan jatuh tempo maksimal 1 tahun sejak tanggal penarikan pinjaman. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga *Bank Bill Swap Rate* (BBSY) ditambah margin tertentu. Penarikan atas fasilitas pinjaman ini dilakukan pada tanggal 19 Desember 2025 dan akan jatuh tempo pada tanggal 19 Desember 2026. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut adalah sebesar AUD72.881.130 (nilai penuh) atau ekuivalen Rp812.788.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

e) BNI, through BNI Singapore branch, obtained a bilateral offshore loan facility with OCBC Singapore worth USD20,000,000 (full amount) with a term of 1 year. The withdrawal of this loan was approved on 18 March 2025 and will mature on 13 March 2026. The interest rate on the loan uses the SOFR floating interest rate as a reference plus a certain margin that will be paid in full at maturity. As of 31 December 2025, the balance of the loan facility was USD20,000,000 (full amount) or equivalent to Rp333,500.

f) BNI, through BNI Tokyo branch, obtained a bilateral offshore loan facility with MUFG Bank, Ltd. with a maximum facility of USD100,000,000 (full amount). The interest rate of the loan uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 30 December 2025 amounting USD10,000,000. This facility has a maximum maturity of 3 months from the date of withdrawal, namely on 30 March 2026. As of 31 December 2025, the loan balance of the facility was USD10,000,000 (full amount) or equivalent to Rp166,750.

g) BNI, through BNI Singapore branch, obtained a bilateral overseas loan facility with Australia and New Zealand Banking Group Limited amounting to AUD72.881.130 (full amount) and a maximum maturity of 1 year from the date of loan withdrawal. The loan interest rate uses the Bank Bill Swap Rate (BBSY) interest rate as a reference plus a certain margin. The withdrawal of this loan facility was made on 19 December 2024 and will mature on 19 December 2025. As of 31 December 2025, the loan balance of the facility was AUD72,881,130 (full amount) or equivalent to Rp812,788.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman bilateral (lanjutan)

h) BNI, melalui BNI cabang Singapura memperoleh fasilitas pinjaman bilateral luar negeri dengan United Overseas Bank Limited sebesar SGD90.000.000 (nilai penuh) dan jatuh tempo maksimal 1 tahun sejak tanggal penarikan pinjaman. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga *Singapore Overnight Rate Average* (SORA). Penarikan atas fasilitas pinjaman ini dilakukan pada tanggal 26 Maret 2025 dan akan jatuh tempo pada tanggal 19 Maret 2026. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut adalah sebesar SGD90.000.000 (nilai penuh) atau ekuivalen Rp1.166.854.

i) BNI, melalui BNI cabang Hongkong memperoleh fasilitas pinjaman bilateral luar negeri dengan MUFG Bank, Ltd. dengan maksimum fasilitas USD100.000.000 (nilai penuh). Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 26 Juni 2025 sebesar USD 50.000.000. Fasilitas ini memiliki jatuh tempo maksimal 1 tahun sejak tanggal penarikan pinjaman, yaitu pada tanggal 26 Juni 2026. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut adalah sebesar USD50.000.000 (nilai penuh) atau ekuivalen Rp833.750.

j) BNI, melalui BNI cabang Hongkong memperoleh fasilitas pinjaman bilateral luar negeri dengan China Construction Bank (Asia) Corporation Limited. Tingkat suku bunga pinjaman menggunakan acuan tingkat suku bunga mengambang SOFR ditambah margin tertentu. Fasilitas ini telah digunakan pada tanggal 26 Juni 2025, 4 September 2025, dan 28 Oktober 2025 masing-masing sebesar USD10.000.000, USD20.000.000, dan USD70.000.000. Fasilitas ini memiliki jatuh tempo maksimal 1 tahun sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 26 Juni 2026, 4 September 2026, dan 28 Oktober 2026. Pada tanggal 31 Desember 2025, saldo pinjaman fasilitas tersebut adalah sebesar USD100.000.000 (nilai penuh) atau ekuivalen Rp1.667.500.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Bilateral loans** (continued)*

h) BNI, through BNI Singapore branch, obtained a bilateral overseas loan facility with United Overseas Bank Limited amounting to SGD90,000,000 (full amount) and a maximum maturity of 1 year from the date of loan withdrawal. The loan interest rate uses the Singapore Overnight Rate Average (SORA) interest rate as a reference. The withdrawal of this loan facility was made on 26 March 2025 and will mature on 19 March 2026. As of 31 December 2025, the loan balance of the facility was SGD90,000,000 (full amount) or equivalent to Rp1,166,854.

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i) BNI, through BNI Hongkong branch, obtained a bilateral offshore loan facility with MUFG Bank, Ltd. with a maximum facility of USD100,000,000 (full amount). The loan interest rate uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 26 June 2025 amounting to USD50.000.000. This facility has a maximum maturity of 1 year from the date of withdrawal of each loan, namely on
26 June 2026 . As of 31 December 2025, the loan balance of the facility was USD50,000,000 (full amount) or equivalent to Rp833,750.

j) BNI, through BNI Hongkong branch, obtained a bilateral overseas loan facility with China Construction Bank (Asia) Corporation Limited. The loan interest rate uses the SOFR floating interest rate as a reference plus a certain margin. This facility has been used on 26 June 2025, 4 September 2025, and 28 October 2025, amounting to USD10,000,000, USD20,000,000, and USD70,000,000, respectively. This facility has a maximum maturity of 1 year from the date of withdrawal of each loan, namely 26 June 2026, 4 September 2026, and 28 October 2026. As of 31 December 2025 the loan balance of the facility was USD100,000,000 (full amount) or equivalent to Rp1,667,500.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Pinjaman penerusan

Pinjaman penerusan pada tanggal 31 Desember 2025 dan 2024 mencakup pinjaman penerusan dari *Kreditanstalt fur Wiederaufbau* untuk pembiayaan *Industrial Efficiency and Pollution Control Phase* I dan II yang diterima pada tahun 2001 dan 2004.

Berdasarkan Perjanjian Penerusan Pinjaman antara BNI dan Departemen Keuangan No. SLA-1145/DP3/2001 tertanggal 30 Maret 2001 dan SLA-1174/DP3/2004 tertanggal 25 Agustus 2004, Pemerintah telah menyetujui BNI sebagai bank pelaksana dengan jumlah fasilitas masing-masing tidak melebihi DM11.700.000 dan EUR9.000.000 (nilai penuh). Tanggal terakhir penarikan pinjaman adalah masing-masing pada tanggal 30 Juni 2001 dan 30 Desember 2007. Jangka waktu pinjaman penerusan ini adalah masing-masing selama 12 tahun termasuk masa tenggang 2 tahun dan 40 tahun termasuk masa tenggang 10 tahun.

Pada tanggal 31 Desember 2025, saldo pinjaman penerusan untuk *Phase* I dan II adalah masing-masing sebesar Rp53 dan EUR2.809.500 (nilai penuh) atau ekuivalen Rp54.230 (31 Desember 2024: EUR2.883.000 (nilai penuh) atau ekuivalen Rp48.504).

Kredit likuiditas untuk kredit koperasi primer kepada anggotanya

Merupakan fasilitas kredit yang diperoleh dari Bank Indonesia terutama ditujukan untuk debitur BNI sehubungan dengan program kredit Pemerintah untuk pinjaman investasi usaha kecil, pinjaman modal kerja dan pinjaman pengusaha kecil. Sesuai dengan Peraturan Pemerintah, manajemen program kredit likuiditas telah dialihkan ke PT Permodalan Nasional Madani, Badan Usaha Milik Negara, yang akan jatuh tempo dalam beberapa tanggal, berdasarkan penyelesaian dari program-program tersebut.

Tingkat bunga atas fasilitas ini berkisar antara 3,00% sampai dengan 7,00% per tahun.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

Two step loans

Two step loans as of 31 December 2025 and 31 December 2024 are step loans from Kreditanstalt fur Wiederaufbau to finance Industrial Efficiency and Pollution Control Phase I and II that was received in 2001 and 2004.

Based on the two step loans agreements between BNI and the Ministry of Finance No. SLA-1145/DP3/2001 dated 30 March 2001 and SLA-1174/DP3/2004 dated 25 August 2004, the Government appointed BNI as an executing bank with total facilities for each not exceeding DM11,700,000 and EUR9,000,000 (full amount). Latest withdrawal date were on 30 June 2001 and 30 December 2007, respectively. The terms of the two step loans are 12 years including 2 years grace period and 40 years including 10 years grace period, respectively.

As of 31 December 2025, two step loans for Phase I and II amounted to Rp53 and EUR2,809,500 (full amount) or equivalent Rp54,230, respectively (31 December 2024: EUR2,883,000 (full amount) or equivalent Rp48,504).

Liquidity loan for members of primary cooperatives

This is a credit facility provided by Bank Indonesia specifically for BNI's debtors in relation to the Government's loan program for small investment loans, working capital loans and small business loans. In accordance with the Government Regulation, the management of this liquidity loan program was transferred to PT Permodalan Nasional Madani, a State-Owned Enterprise. The loan will mature on various dates based on the completion of such programs.

Interest rates on the facility range from 3.00% to 7.00% per annum.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Bankers acceptance

Bankers acceptance merupakan pinjaman antarbank yang diperoleh BNI dari bank-bank luar negeri yang ditujukan untuk meningkatkan likuiditas dengan jangka waktu pinjaman 6 sampai dengan 12 bulan.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

Bankers acceptance

Bankers acceptance represents interbank borrowings for liquidity purposes obtained by BNI from various foreign banks with borrowing period of 6 until 12 months.

	2025	2024	
DZ Bank AG	978,572	888,180	*DZ Bank AG*
Mashreqbank PSC	833,750	563,325	*Mashreqbank PSC*
United Overseas Bank Ltd.		1,915,305	*United Overseas Bank Ltd.*
OCBC Ltd., *Singapore*	-	402,375	*OCBC Ltd., Singapore*
CoBank, *Singapore*	-	402,375	*CoBank, Singapore*
	1,812,322	**4,171,560**	

Lain-lain

PT BNI Multifinance (BNIMF):

PT Bank Victoria International Tbk

Pada tanggal 25 Juli 2019, BNIMF memperoleh tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp200.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa pembiayaan. Fasilitas pinjaman ini telah jatuh tempo pada 21 Desember 2023 dan diperpanjang sampai dengan 21 Desember 2024. Pada tanggal 12 Februari 2025, berdasarkan Surat penawaran No. 026/SKM-KPP/VIC/II/2025 PT Bank Victoria International Tbk setuju untuk memperpanjang fasilitas pinjaman ini hingga 21 Desember 2025 dan menurunkan jumlah maksimum dana yang disediakan menjadi Rp100.000. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

Pada tanggal 17 Maret 2021, berdasarkan Perjanjian Kredit No. 39, PT Bank Victoria International Tbk setuju untuk memberikan tambahan fasilitas *fixed loan III line limit* sebesar Rp100.000 yang digunakan sebagai tambahan modal kerja pembiayaan, yang telah jatuh tempo tanggal 17 Maret 2024. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

Others

PT BNI Multifinance (BNIMF):

PT Bank Victoria International Tbk

On 25 July 2019, BNIMF obtained additional working capital loan facility with a maximum available fund amounting to Rp200,000 which was used as an additional working capital for consumer financing and finance lease. This facility has been matured on 21 December 2023 and extended until 21 December 2024. On 12 February 2025, based on the Offering Letter No. 026/SKM-KPP/VIC/II/2025, PT Bank Victoria International Tbk agreed to extend this loan facility until 21 December 2025 and to reduce the maximum amount of available fund to Rp100,000. This facility has been repaid at maturity date and was not renewed.

On 17 March 2021, based on the Credit Agreement No. 39, PT Bank Victoria International Tbk agreed to provide additional fixed loan III line limit facility amounting to Rp100,000 which was used as an additional working capital for financing that had matured on 17 March 2024. This facility had been repaid at maturity date and was not renewed.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Victoria International Tbk (lanjutan)

Pada tanggal 20 Maret 2025, BNIMF memperoleh tambahan fasilitas *fixed loan IV line limit* sebesar Rp100.000 dan fasilitas *demand loan* sebesar Rp100.000 yang digunakan sebagai tambahan modal kerja pembiayaan, dengan jangka waktu pinjaman 60 bulan.

BNIMF telah menggunakan fasilitas *fixed loan IV line limit* sebesar Rp100.000 pada tanggal 25 Maret 2025, 14 Mei 2025, 5 Juni 2025, 25 Juni 2025, 21 Juli 2025, 4 Agustus 2025, 28 Agustus 2025, 29 September 2025, 18 November 2025, dan 19 November 2025, masing-masing sebesar Rp20.000, Rp10.000, Rp10.000, Rp10.000, Rp12.000, Rp15.000, Rp12.000, Rp10.000, dan Rp1.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 25 Maret 2029, 14 Mei 2029, 5 Juni 2029, 25 Juni 2029, 21 Juli 2029, 4 Agustus 2029, 28 Agustus 2029, 29 September 2029, dan 30 Maret 2026.

BNIMF telah menggunakan fasilitas *demand loan* sebesar Rp49.000 pada tanggal 18 November 2025, 19 November 2025, 16 Desember 2025, dan 29 Desember 2025, masing-masing sebesar Rp15.000, Rp12.000, Rp7.000, dan Rp15.000. Fasilitas ini memiliki jatuh tempo maksimal 3 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 18 Februari 2026, 19 Februari 2026, 16 Maret 2026, dan 30 Maret 2026.

Tingkat suku bunga pinjaman berkisar antara 7,00% dan 8,00% masing-masing untuk pencairan selama tahun 31 Desember 2025 dan 2024.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman di antaranya, menjaga rasio *Non-Performing Finance* ("NPF") maksimal 5,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp137.146 dan Rpnihil.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Victoria International Tbk** (continued)*

On 20 March 2025, BNIMF obtained additional fixed loan IV line limit facility amounting to Rp100,000 and demand loan facility amounting to Rp 100,000 which was used as an additional working capital for financing and tenure of 60 months.

BNIMF has utilised the facility fixed loan IV line limit amounted at Rp100,000 on 25 March 2025, 14 May 2025, 5 June 2025, 25 June 2025, 21 July 2025, 4 August 2025, 28 August 2025, 29 September 2025, 18 November 2025, and 19 November 2025, which each of the drawdown amounted to Rp20,000, Rp10,000, Rp10,000, Rp10,000, Rp12,000, Rp15,000, Rp12,000, Rp10,000, and Rp1,000. This facility will mature maximum 48 months after the drawdown date, which is 25 March 2029, 14 May 2029, 5 June 2029, 25 June 2029, 21 July 2029, 4 August 2029, 28 August 2029, 29 September 2029, and 30 March 2026.

BNIMF has utilised the facility demand loan amounted at Rp49,000 on 18 November 2025, 19 November 2025, 16 December 2025, and 29 December 2025, which each of the drawdown amounted to Rp15,000, Rp12,000, Rp7,000, dan Rp15,000. This facility will mature maximum 3 months after the drawdown date, which is 18 February 2026, 19 February 2026, 16 March 2026, and 30 March 2026.

Interest rate of the borrowing ranged from 7.00% and 8.00% for withdrawal during 31 December 2025 and 2024, respectively.

During the loan period, the BNIMF has to comply with the terms of the loan agreement which include, maintaining Non-Performing Finance ("NPF") ratio at a maximum of 5.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp137,146 and Rpnil, respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT Bank Mega Tbk

Pada tanggal 30 Maret 2021, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Mega Tbk dengan maksimum fasilitas sebesar Rp300.000 dengan jangka waktu pinjaman 60 bulan dan akan jatuh tempo pada tanggal 30 Maret 2026.

Tingkat suku bunga pinjaman adalah 8,75% masing-masing untuk pencairan selama tahun 31 Desember 2025 dan 2024.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rpnihil dan Rp3.819.

PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta

Pada tanggal 18 Oktober 2021, BNIMF memperoleh tambahan fasilitas pinjaman modal kerja tambahan dengan jumlah maksimum Rp50.000, yang berlaku hingga 26 September 2024. Selanjutnya, pada tanggal 16 Juni 2022, berdasarkan *Addendum* Pertama terhadap Perjanjian Kredit No. 48, PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta setuju untuk memperpanjang jangka waktu kredit hingga 26 September 2025. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

Tingkat suku bunga pinjaman adalah 9,00% masing-masing untuk pencairan selama 31 Desember 2025 dan 2024.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio piutang pembiayaan terhadap total aset minimal 40,00%.
c. Menjaga rasio NPF maksimal 5,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rpnihil dan Rp4.245.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

PT Bank Mega Tbk

On 30 March 2021, BNIMF obtained working capital loan facility from PT Bank Mega Tbk with maximum facility amounting to Rp300,000 and tenure of 60 months and will mature on 30 March 2026.

Interest rate of the borrowing was 8.75% for withdrawal during 31 December 2025 and 31 December 2024, respectively.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rpnil and Rp3,819, respectively.

PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta

On 18 October 2021, BNIMF obtained an additional working capital loan facility with a maximum amount of Rp50,000, which is valid until 26 September 2024. Subsequently, on 16 June 2022, based on the First Addendum to Credit Agreement No. 48, PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta agreed to extend the credit term until 26 September 2025. This facility had been fully repaid at maturity date and was not renewed.

Interest rate of the borrowing was 9.00% for withdrawals during 31 December 2025 and 2024, respectively.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the financing to asset ratio at a minimum of 40.00%.
c. Maintaining NPF ratio at a maximum of 5.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rpnil and Rp4,245, respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Jtrust Indonesia Tbk

Pada tanggal 19 Desember 2020, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Jtrust Indonesia Tbk dengan maksimum fasilitas sebesar Rp50.000 dengan jangka waktu pinjaman 48 bulan dan telah jatuh tempo pada tanggal 18 Desember 2024.

Pada tanggal 17 Februari 2022, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Jtrust Indonesia Tbk dengan maksimum fasilitas sebesar Rp200.000 dengan jangka waktu pinjaman 48 bulan dan akan jatuh tempo pada tanggal 17 Februari 2026.

Pada tanggal 22 Mei 2024, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Jtrust Indonesia Tbk dengan maksimum fasilitas sebesar Rp300.000 dengan jangka waktu maksimal pinjaman hingga 60 bulan. BNIMF telah menggunakan fasilitas ini sebesar Rp220.000 pada tanggal 5 Juni 2024, 12 Juli 2024, 6 Agustus 2024, 4 September 2024, 10 Oktober 2024, 6 Februari 2025, 17 Februari 2025, dan 5 Maret 2025 masing-masing sebesar Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp20.000, Rp10.000, Rp10.000, dan Rp20.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 5 Juni 2028, 12 Juli 2028, 6 Agustus 2028, 4 September 2028, dan 10 Oktober 2028, 6 Februari 2029, 17 Februari 2029, dan 5 Maret 2029.

Tingkat suku bunga pinjaman adalah 7,50% dan 7,50% - 9,50% masing-masing untuk pencairan tanggal 31 Desember 2025 dan 2024.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Jtrust Indonesia Tbk

On 19 December 2020, BNIMF obtained working capital loan facility with PT Bank Jtrust Indonesia Tbk with maximum facility amounting to Rp50,000 and tenure of 48 months and had matured on 18 December 2024.

On 17 February 2022, BNIMF obtained working capital loan facility with PT Bank Jtrust Indonesia Tbk with maximum facility amounting to Rp200,000 and tenure of 48 months which will mature on 17 February 2026.

On 22 May 2024, BNIMF obtained working capital loan facility with PT Bank Jtrust Indonesia Tbk with maximum facility amounting to Rp300,000 and maximum tenure of 60 months. BNIMF has utilised this facility amounted at Rp220,000 on 5 June 2024, 12 July 2024, 6 August 2024, 4 September 2024, 10 October 2024, 6 February 2025, 17 February 2025, and 5 March 2025 which each of the drawdown amounted to Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp20,000, Rp10,000, Rp10,000, and Rp20,000. This facility will mature maximum 48 months after the drawdown date, which is on 5 June 2028, 12 July 2028, 6 August 2028, 4 September 2028, 10 October 2028, 6 February 2029, 17 February 2029, and 5 March 2029.

Interest rate of the borrowing was 7.50% and 7.50% - 9.50% for withdrawal during of 31 December 2025 and 2024, respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Jtrust Indonesia Tbk (lanjutan)

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp185.638 dan Rp203.573.

PT Bank Jakarta

Pada tanggal 23 Agustus 2022, PT Bank Jakarta setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan Rp50.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan sewa pembiayaan yang berlaku sampai 22 September 2026.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *current ratio* minimal 1 kali.

b. Menjaga *gearing ratio* maksimal 10 kali.

c. Menjaga rasio piutang pembiayaan terhadap total aset minimal 40,00%.
d. Menjaga rasio NPF maksimal 5,00%.

Tingkat suku bunga pinjaman untuk pencairan selama tahun 31 Desember 2025 dan 2024 adalah 8,00%.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Jtrust Indonesia Tbk** (continued)*

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining NPF ratio at a maximum of 5.00%.

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp185,638 and Rp203,573, respectively.

PT Bank Jakarta

On 23 August 2022, PT Bank Jakarta agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp50,000, which was used as an additional working capital for consumer financing and finance lease that will mature on 22 September 2026.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the current ratio at a minimum of 1 times.
b. Maintaining the gearing ratio at a maximum of 10 times.
c. Maintaining the financing to asset ratio at a minimum of 40.00%.
d. Maintaining NPF ratio at a maximum of 5.00%.

Interest rate of the borrowing for withdrawal during the year ended 31 December 2025 and 2024 was 8.00%.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Jakarta (lanjutan)

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp460 dan Rp7.804.

PT Bank Mandiri (Persero) Tbk

Pada tanggal 16 September 2019, PT Bank Mandiri (Persero) Tbk setuju untuk memberikan tambahan fasilitas pinjaman modal kerja dengan jumlah maksimum dana yang disediakan adalah sebesar Rp250.000 yang digunakan sebagai tambahan modal kerja pembiayaan konsumen dan telah jatuh tempo pada tanggal 20 Februari 2024. Fasilitas ini telah dilunasi saat jatuh tempo dan tidak diperpanjang.

Pada tanggal 16 Maret 2020, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp250.000 dengan jangka waktu pinjaman 48 bulan sejak tanggal penarikan setiap fasilitas. BNIMF telah menggunakan fasilitas ini sebesar Rp219.800 pada 26 Maret 2020, 8 April 2020, 29 April 2020, 6 Mei 2020, 5 Juni 2020, 26 Juni 2020, 27 Juli 2020, 8 September 2020, dan 14 September 2020 masing-masing sebesar Rp20.000, Rp15.000, Rp35.000, Rp30.000, Rp20.800, Rp8.500, Rp11.000, Rp52.000 dan Rp27.500. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 26 Maret 2024, 8 April 2024, 28 April 2024, 6 Mei 2024, 5 Juni 2024, 26 Juni 2024, 27 Juli 2024, 8 September 2024, dan 14 September 2024. Fasilitas ini telah dilunasi saat jatuh tempo dan tidak diperpanjang.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Jakarta** (continued)*

Interest and principal have been paid by the BNIMF on schedule.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp460 and Rp7,804, respectively.

PT Bank Mandiri (Persero) Tbk

On 16 September 2019, PT Bank Mandiri (Persero) Tbk agreed to provide additional working capital loan facility with a maximum available fund amounting to Rp250,000 which was used as an additional working capital for consumer financing and had matured on 20 February 2024. This facility had been repaid at maturity date and was not renewed.

On 16 March 2020, BNIMF obtained additional working capital facility loan from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp250,000 and tenure of 48 months from the date of withdrawal of each credit facility. BNIMF has used this facility amounting to Rp219,800 on 26 March 2020, 8 April 2020, 29 April 2020, 6 May 2020, 5 June 2020, 26 June 2020, 27 July 2020, 8 September 2020, and 14 September 2020, which each of the drawdown amounted to Rp20,000, Rp15,000, Rp35,000, Rp30,000, Rp20,800, Rp8,500, Rp11,000, Rp52,000 and Rp27,500. This facility will mature maximum 48 months after the drawdown date, respectively on 26 March 2024, 8 April 2024, 28 April 2024, 6 May 2024, 5 June 2024, 26 June 2024, 27 July 2024, 8 September 2024, and 14 September 2024. This facility had been repaid at maturity date and was not renewed.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk

Pada tanggal 16 September 2021, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp250.000 dengan jangka waktu pinjaman 48 bulan sejak tanggal penarikan setiap fasilitas. BNIMF telah menggunakan fasilitas ini sebesar Rp10.000 pada tanggal 21 September 2021 dan 22 April 2022 masing-masing sebesar Rp5.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 21 September 2024 dan 22 April 2026.

Pada tanggal 22 Februari 2023, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp350.000 untuk jangka waktu pinjaman sampai dengan 60 bulan sejak tanggal penarikan setiap fasilitas, dengan menggunakan skema *revolving*. BNIMF telah menggunakan fasilitas ini sebesar Rp367.000 pada tanggal 13 Maret 2023, 3 Mei 2023, 16 Mei 2023, 31 Mei 2023, 5 Juni 2023, 21 Juni 2023, 23 Juni 2023, 27 Juni 2023, 3 Juli 2023, 7 Juli 2023, 13 Juli 2023, 20 Juli 2023, 27 Juli 2023, 28 Juli 2023, 2 Agustus 2023, 7 Agustus 2023, 9 Agustus 2023, 14 Agustus 2023, 15 Agustus 2023, dan 16 Agustus 2023 masing-masing sebesar Rp20.000, Rp15.000, Rp35.000, Rp10.000, Rp25.000, Rp10.000, Rp33.000, Rp32.000, Rp35.000, Rp10.000, Rp15.000, Rp12.000, Rp20.000, Rp10.000, Rp10.000, Rp15.000, Rp15.000, Rp15.500, Rp12.500, dan Rp17.000. BNIMF telah melakukan pembayaran sebagian atas penarikan tersebut sehingga tidak melampaui batas plafon fasilitas pinjaman. Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 13 Maret 2025, 3 Mei 2025, 16 Mei 2025, 31 Mei 2025, 5 Juni 2025, 21 Juni 2025, 23 Juni 2025, 27 Juni 2025, 3 Juli 2026, 7 Juli 2025, 13 Juli 2026, 20 Juli 2026, 27 Juli 2026, 28 Juli 2025, 2 Agustus 2025, 7 Agustus 2026, 9 Agustus 2026, 14 Agustus 2025, 15 Agustus 2025, dan 16 Agustus 2026.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Mandiri (Persero) Tbk

On 16 September 2021, BNIMF obtained additional working capital facility loan from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp250,000 and tenure of 48 months from the date of withdrawal of each credit facility. BNIMF has used this facility amounting to Rp10,000 on 21 September 2021 and 22 April 2022 which each of the drawdown amounted to Rp5,000. This facility will mature maximum 48 months from the respective withdrawal date, namely 21 September 2024 and 22 April 2026.

On 22 February 2023, BNIMF obtained additional working capital facility loan from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp350,000 and tenure of 60 months from the date of withdrawal of each credit facility, using a revolving scheme. BNIMF has used this facility amounting to Rp367,000 on 13 March 2023, 3 May 2023, 16 May 2023, 31 May 2023, 5 June 2023, 21 June 2023, 23 June 2023, 27 June 2023, 3 July 2023, 7 July 2023 , 13 July 2023, 20 July 2023, 27 July 2023, 28 July 2023, 2 August 2023, 7 August 2023, 9 August 2023, 14 August 2023, 15 August 2023, and 16 August 2023 which each of the drawdown amounted to Rp20,000, Rp15,000, Rp35,000, Rp10,000, Rp25,000, Rp10,000, Rp33,000, Rp32,000, Rp35,000, Rp10,000, Rp15,000, Rp12,000, Rp20,000, Rp10,000, Rp10,000, Rp15,000, Rp15,000, Rp15,500, Rp12,500 and Rp17,000. BNIMF has made a partial payment on the withdrawals, therefore it does not exceed the loan facility limit. This facility will mature maximum 60 months from the respective withdrawal date, respectively on 13 March 2025, 3 May 2025, 16 May 2025, 31 May 2025, 5 June 2025, 21 June 2025, 23 June 2025, 27 June 2025, 3 July 2026, 7 July 2025, 13 July 2026, 20 July 2026, 27 July 2026, 28 July 2025, 2 August 2025, 7 August 2026, 9 August 2026, 14 August 2025, 15 August 2025, and 16 August 2026.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

Pada tanggal 22 Februari 2023, BNIMF memperoleh tambahan fasilitas pinjaman kredit jangka pendek dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp150.000 dengan skema *revolving* dan jangka waktu pinjaman sampai dengan 12 bulan sejak tanggal penandatanganan perjanjian kredit. Fasilitas ini telah diperpanjang dan telah jatuh tempo pada tanggal 22 Februari 2025.

BNIMF telah melakukan penarikan atas fasilitas pinjaman ini sebesar Rp2.450.000 pada tanggal 31 Oktober 2023, 20 November 2023, 29 Februari 2024, 27 Maret 2024, 30 April 2024, 30 Mei 2024, 31 Mei 2024, 28 Juni 2024, 31 Juli 2024, 29 Agustus 2024, 30 September 2024, 31 Oktober 2024, 29 November 2024, 20 Desember 2024, 30 Desember 2024, 31 Januari 2025, 28 Februari 2025, 28 Februari 2025, 19 Maret 2025, 27 Maret 2025, 30 April 2025, 28 Mei 2025, 31 Juli 2025, 29 Agustus 2025, 29 September 2025, 28 Oktober 2025, dan 28 November 2025 masing-masing sebesar Rp80.000, Rp70.000, Rp75.000, Rp75.000, Rp75.000, Rp75.000, Rp75.000, Rp150.000, Rp150.000, Rp150.000, Rp100.000, Rp150.000, Rp100.000, Rp100.000, Rp50.000, Rp50.000, Rp100.000, Rp50.000, Rp50.000, Rp50.000, Rp100.000, Rp100.000, Rp75.000, Rp75.000, Rp75.000, Rp50.000, Rp100.000, dan Rp100.000 yang jatuh tempo pada tanggal 8 November 2023, 20 Desember 2023, 27 Maret 2024, 22 April 2024, 6 Mei 2024, 3 Juni 2024, 4 Juni 2024, 5 Juli 2024, 2 Agustus 2024, 2 September 2024, 3 Oktober 2024, 4 November 2024, 3 Desember 2024, 24 Desember 2024, 3 Januari 2025, 7 Februari 2025, 4 Maret 2025, 3 Maret 2025, 27 Maret 2025, 8 April 2025, 2 Mei 2025, 3 Juni 2025, 4 Agustus 2025, 2 September 2025, 3 Oktober 2025, 3 November 2025, dan 3 Desember 2025. Fasilitas ini telah dilunasi pada saat jatuh tempo dan tidak diperpanjang.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

On 22 February 2023, BNIMF obtained additional short-term credit loan facility from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp150,000 with a revolving scheme and maximum tenure of 12 months from the date of the signing of Credit Agreement. This facility has been extended and had matured on 22 February 2025.

BNIMF has utilised this facility amounted at Rp2,450,000 on 31 October 2023, 20 November 2023, 29 February 2024, 27 March 2024, 30 April 2024, 30 May 2024, 31 May 2024, 28 June 2024, 31 July 2024, 29 August 2024, 30 September 2024, 31 October 2024, 29 November 2024, 20 December 2024, 30 December 2024, 31 January 2025, 28 February 2025, 28 February 2025, 19 March 2025, 27 March 2025, 30 April 2025, 28 May 2025, 31 July 2025, 29 August 2025, 29 September 2025, 28 October 2025, and 28 November 2025 with respective amounts of Rp80,000, Rp70,000, Rp75,000, Rp75,000, Rp75,000, Rp75,000, Rp75,000, Rp150,000, Rp150,000, Rp150,000, Rp100,000, Rp150,000, Rp100,000, Rp100,000, Rp50,000, Rp50,000, Rp100,000, Rp50,000, Rp50,000, Rp50,000, Rp100,000, Rp100,000, Rp75,000, Rp75,000, Rp75,000, Rp50,000, and Rp100,000 which are due on 8 November 2023, 20 December 2023, 27 March 2024, 22 April 2024, 6 May 2024, 3 June 2024, 4 June 2024, 5 July 2024, 2 August 2024, 2 September 2024, 3 October 2024, 4 November 2024, 3 December 2024, 24 December 2024, 3 January 2025, 7 February 2025, 4 March 2025, 3 March 2025, 27 March 2025, 8 April 2025, 2 May 2025, 3 June 2025, 4 August 2025, 2 September 2025, 3 October 2025, 3 November 2025, and 3 December 2025. This facility had been repaid at maturity date and was not renewed.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

Pada tanggal 16 Oktober 2023, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman sampai dengan 72 bulan sejak tanggal penandatanganan perjanjian kredit dengan skema *revolving*. Pada tanggal 22 Februari 2024, BNIMF memperoleh tambahan fasilitas pinjaman kredit modal kerja dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp1.000.000 dengan jangka waktu pinjaman sampai dengan 60 bulan sejak tanggal penandatanganan perjanjian kredit dengan skema *revolving*.

BNIMF telah menggunakan fasilitas ini sebesar Rp1.050.000 pada tanggal 18 Oktober 2023, 27 Oktober 2023, 13 November 2023, 21 November 2023, 30 November 2023, 4 Desember 2023, 22 Desember 2023, 28 Desember 2023, 10 Januari 2024, 18 Januari 2024, 5 Februari 2024, 27 Februari 2024, 22 Maret 2024, 28 Maret 2024, 2 April 2024, 22 April 2024, dan 8 Mei 2024 masing-masing sebesar Rp60.000, Rp40.000, Rp50.000, Rp25.000, Rp25.000, Rp25.000, Rp46.000, Rp29.000, Rp53.000, Rp47.000, Rp100.000, Rp150.000, Rp100.000, Rp100.000, Rp100.000, Rp50.000, dan Rp50.000.

Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 18 Oktober 2025, 27 Oktober 2025, 13 November 2025, 21 November 2025, 30 November 2025, 4 Desember 2025, 22 Desember 2025, 28 Desember 2026, 10 Januari 2027, 18 Januari 2028, 6 Februari 2028, 27 Februari 2027, 22 Maret 2027, 28 Maret 2027, 3 April 2027, 22 April 2027, dan 8 Mei 2028. Beberapa fasilitas yang jatuh tempo telah dilunasi dan tidak diperpanjang.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

On 16 October 2023, BNIMF obtained additional working capital loan facility from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp500,000 with a maximum tenure of 72 months from the date of the signing of credit agreement with revolving scheme. On 22 February 2024, BNIMF obtained an additional working capital credit loan facility with PT Bank Mandiri (Persero) Tbk with a total facility of Rp1,000,000 with a loan term of up to 60 months from the date of signing the credit agreement with a revolving scheme.

BNIMF has utilised this facility amounted at Rp1,050,000 on 18 October 2023, 27 October 2023, 13 November 2023, 21 November 2023, 30 November 2023, 4 December 2023, 22 December 2023, 28 December 2023, 10 January 2024, 18 January 2024, 5 February 2024, 27 February 2024, 22 March 2024, 28 March 2024, 2 April 2024, 22 April 2024, and 8 May 2024 which each of the drawdown amounted to Rp60,000, Rp40,000, Rp50,000, Rp25,000, Rp25,000, Rp25,000, Rp46,000, Rp29,000, Rp53,000, Rp47,000, Rp100,000, Rp150,000, Rp100,000, Rp100,000, Rp100,000, Rp50,000, and Rp50,000.

This facility will mature maximum 60 months from the respective withdrawal date, respectively on 18 October 2025, 27 October 2025, 13 November 2025, 21 November 2025, 30 November 2025, 4 December 2025, 22 December 2025, and 28 December 2026, 10 January 2027, 18 January 2028, 6 February 2028, 27 February 2027, 22 March 2027, 28 March 2027, 3 April 2027, 22 April 2027, and 8 May 2028. Some facilities that had matured were repaid and not renewed

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

Pada tanggal 20 Juni 2024, BNIMF memperoleh fasilitas pinjaman kredit dengan PT Bank Mandiri (Persero) Tbk dengan total fasilitas sebesar Rp750.000 dengan jangka waktu pinjaman sampai dengan 72 bulan sejak tanggal penandatanganan Perjanjian Kredit dengan skema *revolving*. Pada tanggal 18 Maret 2025, BNIMF memperoleh tambahan fasilitas sebesar Rp1.500.000 dengan skema *revolving*. BNIMF telah menggunakan fasilitas ini sebesar Rp1.228.000 pada tanggal 25 Juni 2024, 27 Juni 2024, 28 Juni 2024, 17 Juli 2024, 22 Juli 2024, 29 Juli 2024, 31 Juli 2024, 15 Agustus 2024, 21 Agustus 2024, 30 Agustus 2024, 23 September 2024, 25 September 2024, 21 Oktober 2024, 25 Oktober 2024, 18 November 2024, 26 November 2024, 11 Desember 2024, 17 Desember 2024, 8 Januari 2025, 14 Januari 2025, 17 Januari 2025, 20 Januari 2025, 23 Januari 2025, 6 Februari 2025, 7 Maret 2025, 20 Maret 2025, 26 Maret 2025, 25 April 2025, 30 April 2025, 16 Mei 2025, 27 Mei 2025, 3 Juni 2025, 18 Juni 2025, dan 19 Juni 2025 masing-masing sebesar Rp35.000, Rp77.000, Rp15.000, Rp35.000, Rp40.000, Rp27.000, Rp26.000, Rp50.000, Rp45.000, Rp30.000, Rp20.000, Rp30.000, Rp15.000, Rp10.000, Rp20.000, Rp20.000, Rp15.000, Rp25.000, Rp10.000, Rp15.000, Rp15.000, Rp100.000, Rp40.000, Rp35.000, Rp10.000, Rp20.000, Rp96.000, Rp12.000, Rp88.000, Rp47.000, Rp10.000, Rp20.000, Rp165.000, dan Rp10.000.

Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing, yaitu pada tanggal 25 Juni 2028, 27 Juni 2028, 28 Juni 2028, 17 Juli 2028, 22 Juli 2028, 29 Juli 2028, 31 Juli 2028, 15 Agustus 2028, 21 Agustus 2028, 30 Agustus 2028, 23 September 2028, 25 September 2028, 21 Oktober 2028, 25 Oktober 2028, 18 November 2028, 26 November 2028, 11 Desember 2029, dan 17 Desember 2029.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

On 20 June 2024, BNIMF obtained credit loan facility from PT Bank Mandiri (Persero) Tbk with total facility amounting to Rp750,000 with a maximum tenure of 72 months from the date of the signing of Credit Agreement with revolving scheme. On 18 March 2025, BNIMF obtained additional facility amounting to Rp1,500,000 under a revolving scheme. BNIMF has utilised this facility amounted at Rp1,228,000 on 25 June 2024, 27 June 2024, 28 June 2024, 17 July 2024, 22 July 2024, 29 July 2024, 31 July 2024, 15 Agustus 2024, 21 Agustus 2024, 30 Agustus 2024, 23 September 2024, 25 September 2024, 21 October 2024, 25 October 2024, 18 November 2024, 26 November 2024, 11 December 2024 17 December 2024, 8 January 2025, 14 January 2025, 17 January 2025, 20 January 2025, 23 January 2025, 6 February 2025, 7 March 2025, 20 March 2025, 26 March 2025, 25 April 2025, 30 April 2025, 16 May 2025, 27 May 2025, 3 June 2025, 18 June 2025, and 19 June 2025 which each of the drawdown amounted to Rp35,000, Rp77,000, and Rp15,000, Rp35,000, Rp40,000, Rp27,000, Rp26,000, Rp50,000, Rp45,000, Rp30,000, Rp20,000, Rp30,000, Rp15,000, Rp10,000, Rp20,000, Rp20,000, Rp15,000, Rp25,000, Rp10,000, Rp15,000, Rp15,000, Rp100,000, Rp40,000, Rp35,000, Rp10,000, Rp20,000, Rp96,000, Rp12,000, Rp88,000, Rp47,000, Rp10,000, Rp20,000, Rp165,000, and Rp10,000.

This facility will mature maximum 60 months from the respective withdrawal date, respectively on 25 June 2028, 27 June 2028, 28 June 2028, 17 July 2028, 22 July 2028, 29 July 2028, 31 July 2028, 15 August 2028, 21 August 2028, 30 August 2028, 23 September 2028, 25 September 2028, 21 October 2028, 25 October 2028, 18 November 2028, 26 November 2028, 11 December 2029, and 17 December 2029.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Mandiri (Persero) Tbk (lanjutan)

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

Tingkat suku bunga pinjaman berkisar antara 7,50% - 8,00% dan 7,18% - 8,00% masing-masing untuk pencairan selama tahun 31 Desember 2025 dan 2024.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp1.374.215 dan Rp1.525.654.

Dalam perjanjian-perjanjian fasilitas pinjaman yang disebutkan di atas, BNIMF diharuskan menjaga rasio-rasio keuangan dan memenuhi pembatasan-pembatasan tertentu termasuk tidak melebihi dari batas yang telah ditetapkan, antara lain, dalam hal melakukan pinjaman, pemberian piutang, pemberian jaminan atau ganti rugi, pelepasan aset, perubahan bisnis, akuisisi perusahaan dan bisnis, pengeluaran untuk barang modal, transaksi dengan afiliasi dan penghapusan piutang.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Mandiri (Persero) Tbk** (continued)*

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the NPF ratio at a maximum of 5.00%.

Interest rate of the borrowing ranged from 7.50% - 8.00% and 7.18% - 8.00% for withdrawal during 31 December 2025 and 2024, respectively.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp1,374,215 and Rp1,525,654, respectively.

Under the above-mentioned loans facility agreements, BNIMF is required to maintain certain financial ratios and comply to certain restrictions including not exceeding established limits, such as, in areas of making any loans or granting any credit, giving any guarantee or indemnity, disposal of assets, changes in business, acquisition of other companies or businesses, capital expenditures, transactions with affiliates and write off of receivables.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Central Asia Tbk

Pada tanggal 22 Agustus 2023, BNIMF memperoleh fasilitas pinjaman kredit *Installment loan* dengan PT Bank Central Asia Tbk dengan maksimum fasilitas sebesar Rp105.000 dengan jangka waktu pinjaman 48 bulan sejak tanggal penarikan fasilitas. BNIMF telah menggunakan fasilitas ini sebesar Rp105.500 pada tanggal 23 Agustus 2023, 31 Agustus 2023, 7 September 2023, 19 September 2023, 26 September 2023, 6 Desember 2023, 16 Februari 2024, dan 20 Februari 2024 masing-masing sebesar Rp5.000, Rp10.000, Rp23.000, Rp11.500, Rp7.000, Rp10.000, Rp19.500, dan Rp19.500. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 23 Agustus 2026, 21 Agustus 2026, 7 September 2025, 1 September 2025, 20 September 2026, 27 November 2026, 21 Januari 2027, dan 31 Januari 2028.

Pada 6 Februari 2024, BNIMF memperoleh fasilitas pinjaman kredit *Installment loan* dengan PT Bank Central Asia Tbk dengan maksimum fasilitas sebesar Rp350.000 dengan jangka waktu pinjaman maksimal 48 bulan sejak tanggal penarikan fasilitas. BNIMF telah menggunakan fasilitas ini sebesar Rp135.000 pada tanggal 6 Februari 2024, 23 April 2024, 12 Juni 2024, 17 Oktober 2024, 24 Januari 2025, 29 April 2025, dan 18 November 2025 masing-masing sebesar Rp5.000, Rp20.000, Rp50.000, Rp20.000, Rp10.000, Rp10.000, Rp10.000, dan Rp10.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 30 Januari 2028, 4 April 2026, 2 Juni 2027, 17 Oktober 2027, 17 Januari 2029, 12 April 2028, 10 November 2028, dan 10 November 2028.

Tingkat suku bunga pinjaman berkisar antara 7,63% - 7,75% dan 7,88% masing-masing untuk pencairan per 31 Desember 2025 dan 2024.

Pada tanggal 31 Desember 2025 dan 2024 saldo pinjaman fasilitas tersebut masing-masing sebesar Rp24.805 dan Rp138.909.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Central Asia Tbk

On 22 August 2023, BNIMF obtained Installment loan facility from PT Bank Central Asia Tbk with maximum facility amounting to Rp105,000 and tenure of 48 months from the date of withdrawal of each facilities. BNIMF has utilised this facility amounted at Rp105,500 on 23 August 2023, 31 August 2023, 7 September 2023, 19 September 2023, 26 September 2023, 6 Desember 2023, 16 February 2024, and 20 February 2024 which each of the drawdown amounted to Rp5,000, Rp10,000, Rp23,000, Rp11,500, Rp7,000, Rp10,000, Rp19,500, and Rp19,500. This facility will mature maximum 48 months after the drawdown date, respectively on 23 August 2026, 21 August 2026, 7 September 2025, 1 September 2025, 20 September 2026, 27 November 2026, 21 January 2027, and 31 January 2028.

On 6 February 2024, BNIMF obtained Installment loan facility from PT Bank Central Asia with maximum facility amounting to Rp350,000 and maximum tenure of 48 months from the date of withdrawal of each facilities. BNIMF has utilised this facility amounted at Rp135,000 on 6 February 2024, 23 April 2024, 12 June 2024, 17 October 2024, 24 January 2025, 29 April 2025, and 18 November 2025 which each of the drawdown amounted to Rp5,000, Rp20,000, Rp50,000 Rp20,000, Rp10,000, Rp10,000, Rp10,000, and Rp10,000. This facility will mature maximum 48 months after the drawdown date, respectively on 30 January 2028, 4 April 2026, 2 June 2027, 17 October 2027, 17 January 2029, 12 April 2028, and 10 November 2028.

Interest rate of the borrowing ranged from 7.63% - 7.75% and 7.88% for withdrawals as of 31 December 2025 and 2024.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp24,805 and Rp138,909 respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Digital BCA

Pada tanggal 13 Desember 2023, BNIMF memperoleh fasilitas pinjaman kredit *installment loan* dengan PT Bank Digital BCA dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman 48 bulan tahun sejak tanggal penarikan fasilitas. BNIMF telah menggunakan fasilitas ini sebesar Rp100.000 pada tanggal 22 Desember 2023, 24 Januari 2024, 31 Januari 2024, dan 27 Mei 2024 masing-masing sebesar Rp4.500, Rp15.000, Rp30.500, dan Rp50.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 20 Desember 2027, 20 Januari 2027, 20 Januari 2027, dan 20 Mei 2028.

Pada 22 Juli 2024, BNIMF memperoleh fasilitas pinjaman kredit *Installment loan* dengan PT Bank Digital BCA dengan maksimum fasilitas sebesar Rp350.000 dengan jangka waktu pinjaman 60 bulan sejak tanggal penarikan fasilitas. BNIMF telah menggunakan fasilitas ini sebesar Rp193.000 pada tanggal 30 Agustus 2024, 3 Oktober 2024 , 8 November 2024, 4 Desember 2024, 3 Januari 2025, 5 Februari 2025, 5 Februari 2025, 22 April 2025, dan 11 November 2025 masing-masing sebesar Rp35.000, Rp35.000, Rp17.000 Rp20.000, Rp25.000, Rp20.000, Rp20.000, Rp9.000, dan Rp12.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 20 Agustus 2028, 20 September 2028, 20 Oktober 2027, 20 November 2027, 20 Desember 2027, 20 Januari 2028, 20 Januari 2028, 20 April 2028, dan 20 Oktober 2028.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 5,00%.

Tingkat suku bunga pinjaman adalah 7,63% - 7,88% dan 7,88% pada 31 Desember 2025 dan 2024.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Digital BCA

On 13 December 2023, BNIMF obtained installment loan facility from PT Bank Digital BCA with maximum facility amounting to Rp100,000 and tenure of 48 months from the date of withdrawal of each facilities. BNIMF has utilised this facility amounted at Rp100,000 on 22 December 2023, 24 January 2024, 31 January 2024, and 27 May 2024 which each of the drawdown amounted to Rp4,500, Rp15,000, Rp30,500, and Rp50,000. This facility will mature maximum 48 months after the drawdown date, which is on 20 December 2027, 20 January 2027, 20 January 2027, and 20 May 2028.

On 22 July 2024, BNIMF obtained installment loan facility from PT Bank Digital BCA with maximum facility amounting to Rp350,000 and tenure of 60 months from the date of withdrawal of each facilities. BNIMF has utilised this facility amounted at Rp193,000 on 30 August 2024, 3 October 2024, 8 November 2024, 4 December 2024, 3 January 2025, 5 February 2025, 22 April 2025, and 11 November 2025 which each of the drawdown amounted to Rp35,000, Rp35,000, Rp17,000, Rp20,000, Rp25,000, Rp20,000, Rp20,000, Rp9,000, and Rp12,000. This facility has a maximum maturity of 48 months from the date of withdrawal of each loan, namely on 20 August 2028, 20 September 2028, 20 October 2027, 20 November 2027, 20 December 2027, 20 January 2028, 20 January 2028, 20 April 2028, and 20 October 2028.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the NPF ratio at a maximum of 5.00%.

Interest rate of the borrowing ranged from 7.63% - 7.88% and 7.88% during 31 December 2025 and 2024.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Digital BCA (lanjutan)

Pada tanggal 31 Desember 2025 dan 2024 saldo pinjaman fasilitas tersebut masing-masing sebesar Rp182.229 dan Rp178.076.

PT Bank Panin Tbk

Pada tanggal 13 Oktober 2023, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Panin Tbk dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman 36 bulan atau 48 bulan sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp100.000 pada tanggal 23 November 2023, 5 Desember 2023, 19 Desember 2023 dan 5 Januari 2024 masing-masing sebesar Rp10.000, Rp25.000, Rp30.000 dan Rp35.000.

Fasilitas ini memiliki jatuh tempo maksimal 36 bulan atau 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 23 November 2027, 4 Desember 2026, 18 Desember 2026 dan 5 Januari 2028.

Pada tanggal 21 Maret 2024, BNIMF memperoleh fasilitas pinjaman kredit tambahan dengan PT Bank Panin Tbk dengan maksimum fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman 36 bulan atau 48 bulan sejak tanggal penarikan fasilitas.

BNIMF telah menggunakan fasilitas ini sebesar Rp500.000 pada tanggal 22 April 2024, 2 Mei 2024, 14 Mei 2024, 6 Juni 2024, 12 Juni 2024, 3 Juli 2024, 13 Agustus 2024, 3 Oktober 2024, 23 Desember 2024, 7 Mei 2025, 3 Juni 2025, 3 Juli 2025, 25 Juli 2025, 1 Agustus 2025, 2 September 2025, 15 September 2025, 3 Oktober 2025, 17 Oktober 2025, 27 Oktober 2025, 28 Oktober 2025, 4 November 2025, dan 4 November 2025 masing-masing sebesar Rp30.000, Rp50.000, Rp50.000, Rp50.000, Rp30.000, Rp50.000, Rp30.000, Rp20.000, Rp10.000, Rp10.000, Rp14.000, Rp15.000, Rp10.000, Rp12.000, Rp17.000, Rp9.000, Rp28.000, Rp8.000, Rp10.000, Rp12.000, Rp28.000, dan Rp7.000.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Digital BCA** (continued)*

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp182,229 and Rp178,076, respectively.

PT Bank Panin Tbk

On 13 October 2023, BNIMF obtained working capital loan facility from PT Bank Panin Tbk with maximum facility amounting to Rp100,000 and tenure of 36 months or 48 months from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp100,000 on 23 November 2023, 5 December 2023, 19 December 2023, and 5 January 2024 which each of the drawdown amounted to Rp10,000, Rp25,000, Rp30,000 and Rp35,000.

This facility will mature maximum 36 months or 48 month after the drawdown date, respectively on 23 November 2027, 4 December 2026, 18 December 2026 and 5 January 2028.

On 21 March 2024, BNIMF obtained additional credit loan facility from PT Bank Panin Tbk with maximum facility amounting to Rp500,000 and tenure of 36 months or 48 months from the date of withdrawal of each facilities.

BNIMF has utilised this facility amounted at Rp500,000 on 22 April 2024, 2 May 2024, 14 May 2024, 6 June 2024, 12 June 2024, 3 July 2024, 13 August 2024, 3 October 2024, 23 December 2024, 7 May 2025, 3 June 2025, 3 July 2025, 25 July 2025, 1 August 2025, 2 September 2025, 15 September 2025, 3 October 2025, 17 October 2025, 27 October 2025, 28 October 2025, 4 November 2025, and 4 November 2025 which each of the drawdown amounted to respectively amounting to Rp30,000, Rp50,000, Rp50,000, Rp50,000, Rp30,000, Rp50,000, Rp30,000, Rp20,000, Rp10,000, Rp10,000, Rp14,000, Rp15,000, Rp10,000, Rp12,000, Rp17,000, Rp9,000, Rp28,000, Rp8,000, Rp10,000, Rp12,000, Rp28,000, and Rp7,000.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Panin Tbk (lanjutan)

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 23 April 2028, 30 April 2027, 14 Mei 2027, 6 Juni 2028, 12 Juni 2028, 3 Juli 2028, 13 Agustus 2027, 3 Oktober 2028, 23 Desember 2028 dan 21 Maret 2029 untuk seluruh penarikan yang dilakukan di tahun 2025.

Tingkat suku bunga pinjaman berkisar antara 7,63% - 7,88% dan 8,00% masing-masing untuk pencairan per 31 Desember 2025 dan 2024.

Pembayaran bunga dan pokok pinjaman telah dibayarkan oleh BNIMF sesuai dengan jadwal.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga *gearing ratio* maksimal 10 kali.

b. Menjaga rasio NPF maksimal 3,00%.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut sebelum dikurangi biaya provisi masing-masing sebesar Rp394.037 dan Rp347.118.

PT Bank CTBC Indonesia

Pada tanggal 9 Oktober 2021, BNIMF telah mendapatkan modal kerja dari PT Bank CTBC Indonesia dengan total Rp125.000. Pada tanggal 9 Oktober 2023, fasilitas ini diperpanjang dan telah jatuh tempo pada tanggal 27 Oktober 2024.

Pada tanggal 13 Januari 2025, BNIMF telah memperoleh modal kerja dari PT Bank CTBC Indonesia dengan sebesar Rp125.000 dengan jangka waktu pinjaman 42 bulan.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Panin Tbk** (continued)*

This facility will mature maximum 48 months after the drawdown date, which is on 23 April 2028, 30 April 2027, 14 May 2027, 6 June 2028, 12 June 2028, 3 July 2028, 13 August 2027, 3 October 2028, 23 December 2028 and 21 March 2029 for the drawdowns made in 2025.

Interest rate of the borrowing ranged from 7.63% - 7.88% and 8.00% for withdrawals as of 31 December 2025 and 2024.

Interest and principal have been paid by the BNIMF on schedule.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 10 times.
b. Maintaining the NPF ratio at a maximum of 3.00%.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility before deducted by provision cost amounted to Rp394,037 and Rp347,118.

PT Bank CTBC Indonesia

On 9 October 2021, BNIMF has obtained a working capital loan facility from PT Bank CTBC Indonesia amounted at Rp125,000. On 9 October 2023, this facility has been extended and had matured on 27 October 2024.

On 13 January 2025, BNIMF has obtained a working capital loan facility from PT Bank CTBC Indonesia amounted to Rp125,000 with tenure of 42 months.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank CTBC Indonesia (lanjutan)

BNIMF telah menggunakan fasilitas ini sebesar Rp78.000 pada tanggal 24 Februari 2025, 6 Maret 2025, 11 Juni 2025, dan 3 Juli 2025 masing-masing sebesar Rp25.000, Rp25.000, Rp10.000 dan Rp18.000. Fasilitas ini memiliki jatuh tempo maksimal 36 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 24 Februari 2028, 6 Maret 2028, 11 Juni 2028, dan 3 Juli 2028.

Tingkat suku bunga pinjaman adalah 7,50% dan 8,00% untuk pencairan selama 31 Desember 2025 dan 2024.

Pada tanggal 31 Desember 2025 dan 2024 saldo pinjaman fasilitas tersebut adalah masing-masing sebesar Rp60.639 dan Rpnihil.

PT Bank Danamon Indonesia Tbk

Pada tanggal 25 Februari 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Danamon Indonesia Tbk dengan maksimum fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman 48 bulan. BNIMF telah menggunakan fasilitas ini sebesar Rp500.000 pada tanggal 13 Maret 2024, 4 April 2024, 25 April 2024, 2 Mei 2024, 30 Mei 2024, 24 Juni 2024, 3 Juli 2024, 5 Agustus 2024, dan 4 September 2024 masing-masing sebesar Rp100.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, Rp50.000, dan Rp50.000. Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 13 Maret 2028, 4 April 2028, 25 April 2028, 2 Mei 2028, 30 Mei 2028, 24 Juni 2028, 3 Juli 2028, 5 Agustus 2028, dan 4 September 2028.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank CTBC Indonesia** (continued)*

BNIMF has utilised this facility amounted at Rp78,000 on 24 February 2025, 6 March 2025, 11 June 2025, dan 3 July 2025 masing-masing sebesar Rp25,000, Rp25,000, Rp10,000 dan Rp18,000. This facility will mature maximum 36 months after the drawdown date, which is on 24 February 2028, 6 March 2028, 11 June 2028, dan 3 July 2028.

Interest rate of the borrowing ranged from 7.50% and 8.00% for withdrawal during 31 December 2025 and 2024.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp60,639 and Rpnil, respectively.

PT Bank Danamon Indonesia Tbk

On 25 February 2024, BNIMF obtained working capital loan facility from PT Bank Danamon Indonesia Tbk with maximum facility amounting to Rp500,000 and tenure of 48 months. BNIMF has utilised this facility amounted at Rp500,000 on 13 March 2024, 4 April 2024, 25 April 2024, 2 May 2024, 30 May 2024, 24 June 2024, 3 July 2024, 5 August 2024, and 4 September 2024 which each of the drawdown amounted to Rp100,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, Rp50,000, and Rp50,000. This facility will mature maximum 48 months after the drawdown date, which is on 13 March 2028, 4 April 2028, 25 April 2028, 2 May 2028, 30 May 2028, 24 June 2028, 3 July 2028, 5 August 2028, and 4 September 2028.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Danamon Indonesia Tbk: (lanjutan)

Tingkat suku bunga pinjaman adalah 8,00% untuk pencairan selama 31 Desember 2025.

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a Menjaga *gearing ratio* maksimal 7 kali.

b Menjaga rasio NPF maksimal 3,00%.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp320.639 dan Rp434.867.

PT Bank Permata Tbk

Pada tanggal 20 Maret 2024, BNIMF memperoleh fasilitas I pinjaman kredit modal kerja dengan PT Permata Tbk dengan maksimum fasilitas sebesar Rp400.000 dengan jangka waktu pinjaman 48 bulan.

BNIMF telah menggunakan fasilitas ini sebesar Rp220.000 pada tanggal 27 Juni 2024, 3 Juli 2024, 5 Agustus 2024, 18 Februari 2025, 4 Maret 2025, 12 Maret 2025, 18 Maret 2025, dan 9 April 2025 masing-masing sebesar Rp30.000, Rp50.000, Rp50.000, Rp10.000, Rp20.000, Rp20.000, Rp10.000, dan Rp30.000.

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing yaitu pada tanggal 27 Juni 2027, 3 Juli 2027, 5 Agustus 2027, 18 Februari 2028, 4 Maret 2028, 12 Maret 2028, 18 Maret 2028, dan 9 April 2028.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Danamon Indonesia Tbk:** (continued)*

Interest rate of the borrowing was 8.00% for withdrawal during 31 December 2025.

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 7 times.
b. Maintaining the NPF ratio at a maximum of 3.00%.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp320,639 and Rp434,867, respectively.

PT Bank Permata Tbk

On 20 March 2024, BNIMF obtained working capital loan facility I from PT Bank Permata Tbk with maximum facility amounting to Rp400,000 and tenure of 48 months.

BNIMF has utilised this facility amounted at Rp220,000 on 27 June 2024, 3 July 2024, 5 August 2024, 18 February 2025, 4 March 2025, 12 March 2025, 18 March 2025, and 9 April 2025 which each of the drawdown amounted to Rp30,000, Rp50,000, Rp50,000, Rp10,000, Rp20,000, Rp20,000, Rp10,000, and Rp30,000.

This facility will mature maximum 48 month after the drawdown date, respectively on 27 June 2027, 3 July 2027, 5 August 2027, 18 February 2028, 4 March 2028, 12 March 2028, 18 March 2028, and 9 April 2028.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Permata Tbk: (lanjutan)

Pada tanggal 3 Mei 2024, BNIMF memperoleh fasilitas jangka pendek dengan PT Bank Permata Tbk dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu sampai dengan 30 November 2025. BNIMF telah menggunakan fasilitas ini sebesar Rp35.000 pada tanggal 19 November 2024 dan 13 Desember 2024, masing-masing sebesar Rp25.000 dan Rp10.000. Fasilitas ini memiliki jatuh tempo maksimal 3 bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 26 November 2024 dan 23 Desember 2024.

Tingkat suku bunga pinjaman adalah 7,95% dan 8,00% untuk pencairan selama 31 Desember 2025.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp137.222 dan Rp112.500.

PT Bank Ganesha Tbk

Pada tanggal 22 Maret 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Ganesha Tbk dengan maksimum fasilitas sebesar Rp100.000 dengan jangka waktu pinjaman 48 bulan. BNIMF telah menggunakan fasilitas ini sebesar Rp100.000 pada tanggal 19 April 2024, 3 Mei 2024, dan 5 Juni 2024 masing-masing sebesar Rp30.000, Rp30.000, dan Rp40.000. Fasilitas ini memiliki jatuh tempo maksimal 48 Bulan sejak tanggal penarikan masing-masing pinjaman, yaitu pada tanggal 19 April 2028, 3 Mei 2028, dan 5 Juni 2028.

Tingkat suku bunga pinjaman adalah 8,00% untuk pencairan selama 31 Desember 2025 dan 2024.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Bank Permata Tbk:** (continued)*

On 3 May 2024, BNIMF obtained short-term loan facility from PT Bank Permata Tbk with a maximum facility amounting Rp100,000, effective until 30 November 2025. BNIMF has utilised this facility amounted at Rp35,000 on 19 November 2024 and 13 December 2024, which each of the drawdown amounted to Rp25,000 and Rp10,000. This facility will mature maximum 3 months after the drawdown date, which is on 26 November 2024 and 23 December 2024.

Interest rate of the borrowing ranged from 7.95% and 8.00% for withdrawals during 31 December 2025.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp137,222 and Rp112,500, respectively.

PT Bank Ganesha Tbk

On 22 March 2024, BNIMF obtained working capital loan facility from PT Bank Ganesha with maximum facility amounting to Rp100,000 and tenure of 48 months. BNIMF has utilised this facility amounted at Rp100,000 on 19 April 2024, 3 May 2024, and 5 June 2024 which each of the drawdown amounted to Rp30,000, Rp30,000, and Rp40,000. This facility will mature maximum 48 months after the drawdown date, respectively on 19 April 2028, 3 May 2028, and 5 June 2028.

Interest rate of the borrowing was 8.00% for withdrawal during 31 December 2025 and 31 December 2024.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Ganesha Tbk: (lanjutan)

Selama periode pinjaman, BNIMF memiliki kewajiban untuk memenuhi ketentuan dalam perjanjian pinjaman diantaranya:

a. Menjaga gearing ratio maksimal 8 kali.
b. Menjaga rasio NPF maksimal 3,00%.
c. Menjaga rasio piutang lancar minimal 85,00%.
d. Menjaga rasio piutang pembiayaan terhadap total aset minimal 40,00%.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp60.625 dan Rp85.625.

PT Bank Jago Tbk

Pada tanggal 26 Juli 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Jago Tbk dengan maksimum fasilitas sebesar Rp500.000 dengan jangka waktu pinjaman 72 bulan.

BNIMF telah menggunakan fasilitas ini sebesar Rp164.000 pada tanggal 31 Juli 2024, 22 Agustus 2024, 4 September 2024, 18 Oktober 2024, 12 November 2024, 31 Januari 2025, dan 18 Februari 2025 masing-masing sebesar Rp49.000, Rp25.000, Rp50.000, Rp15.000, Rp25.000, Rp10.000, dan Rp10.000. Fasilitas ini memiliki jatuh tempo maksimal 60 bulan sejak tanggal penarikan masing-masing pinjaman yaitu pada tanggal 31 Juli 2029, 22 Agustus 2029, 4 September 2029, 18 Oktober 2029, 12 November 2029, 31 Januari 2030, dan 18 Februari 2030.

Tingkat suku bunga pinjaman adalah 7,75% untuk pencairan selama 31 Desember 2025.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp85.259 dan Rp156.394.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

***PT Ganesha Tbk:** (continued)*

During the loan period, BNIMF has to comply with the terms of the loan agreement which include the following:

a. Maintaining the gearing ratio at a maximum of 8 times.
b. Maintaining the NPF ratio at a maximum of 3.00%.
c. Maintaining the current receivable ratio at a minimum of 85.00%
d. Maintaining the financing to assets ratio at a minimum of 40.00%

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp60,625 and Rp85,625, respectively.

PT Bank Jago Tbk

On 26 July 2024, BNIMF obtained a working capital loan facility with PT Bank Jago Tbk with a maximum facility of Rp500,000 with a loan term of 72 months.

BNIMF has utilised this facility amounted at Rp164,000 on 31 July 2024, 22 August 2024, 4 September 2024, 18 October 2024, 12 November 2024, 31 January 2025, and 18 February 2025 which each of the drawdown amounted to Rp49,000, Rp25,000, Rp50,000, Rp15,000, Rp25,000, Rp10,000, and Rp10,000. This facility will mature maximum 60 months after the drawdown date, respectively on 31 July 2029, 22 August 2029, 4 September 2029, 18 October 2029, 12 November 2029, 31 Januari 2030, and 18 Februari 2030.

Interest rate of the borrowing was 7.75% for withdrawal during 31 December 2025.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp85,259 and Rp156,394, respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank Maybank Indonesia Tbk

Pada tanggal 21 Agustus 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank Maybank Indonesia dengan maksimum fasilitas sebesar Rp450.000 dan Rp50.000 dengan jangka waktu pinjaman 60 bulan.

Tingkat suku bunga pinjaman adalah 7,75% dan 7,90% untuk pencairan selama 31 Desember 2025 dan 2024.

BNIMF telah menggunakan fasilitas ini sebesar Rp311.000 pada tanggal 19 September 2024, 4 November 2024, 10 Desember 2024, 3 Januari 2025, 27 Februari 2025, 3 Maret 2025, 9 April 2025, 3 Juni 2025, 23 Juni 2025, 1 Juli 2025, 9 Juli 2025, 17 Juli 2025, 4 Agustus 2025, 6 Agustus 2025, 15 Agustus 2025, 4 November 2025, 4 November 2025, 17 Desember 2025, 22 Desember 2025, dan 30 Desember 2025 masing-masing sebesar Rp40.000, Rp30.000, Rp15.000, Rp25.000, Rp10.000, Rp10.000, Rp30.000, Rp20.000, Rp10.000, Rp15.000, Rp10.000, Rp10.000, Rp15.000, Rp11.000, Rp12.000, Rp5.000, Rp5.000, Rp10.000, Rp18.000, dan Rp10.000.

Fasilitas ini memiliki jatuh tempo maksimal 48 bulan sejak tanggal penarikan masing-masing yaitu pada tanggal 19 September 2028, 4 November 2028, 10 Desember 2028, 3 Januari 2029, 27 Februari 2029, 3 Maret 2029, 9 April 2029, 3 Juni 2029, 23 Juni 2029, 1 Juli 2029, 9 Juli 2029, 17 Juli 2029, 4 Agustus 2029, 6 Agustus 2029, 15 Agustus 2029, 4 November 2029, 4 November 2029, 17 Desember 2029, 22 Desember 2029, dan 30 Desember 2029.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp261.167 dan Rp81.875.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank Maybank Indonesia Tbk

On 21 August 2024, BNIMF obtained working capital loan facility from PT Bank Maybank Indonesia Tbk with maximum facility amounting to Rp450,000 and Rp50,000 and tenure of 60 months.

Interest rate of the borrowing was 7.75% and 7.90% for withdrawal during 31 December 2025 and 2024.

BNIMF has used this facility for Rp311,000 on 19 September 2024 November 2024, 10 December 2024, 3 January 2025, 27 February 2025, 3 March 2025, 9 April 2025, 3 June 2025, 23 June 2025, 1 July 2025, 9 July 2025, 17 July 2025, 4 August 2025, 6 August 2025, 15 August 2025, 4 November 2025, 4 November 2025, 17 December 2025, 22 December 2025, and 30 December 2025 which each of the drawdown amounted to Rp40,000, Rp30,000, Rp15,000, Rp25,000, Rp10,000, Rp10,000, Rp30,000, Rp20,000, Rp10,000, Rp15,000, Rp10,000, Rp10,000, Rp15,000, Rp11,000, Rp12,000, Rp5,000, Rp5,000, Rp10,000, Rp18,000, and Rp10,000.

This facility will mature maximum 48 months after the drawdown date, respectively on 19 September 2028, 4 November 2028, 10 December 2028, 3 January 2029, 27 February 2029, 3 March 2029, 9 April 2029, 3 June 2029, 23 June 2029, 1 July 2029, 9 July 2029, 17 July 2029, 4 August 2029, 6 August 2029, 15 August 2029, 4 November 2029, 4 November 2029, 17 December 2029, 22 December 2029, and 30 December 2029.

As of 31 December 2025 and 2024, the outstanding loan balance under this facility amounted to Rp261,167 and Rp81,875, respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

PT Bank of India Indonesia Tbk

Pada tanggal 15 October 2024, BNIMF memperoleh fasilitas pinjaman kredit modal kerja dengan PT Bank of India Indonesia Tbk, dengan maksimum fasilitas sebesar Rp200.000 dengan jangka waktu pinjaman 42 bulan.

Tingkat suku bunga pinjaman adalah 7,75% untuk pencairan selama 31 Desember 2025 dan 2024.

BNIMF telah menggunakan fasilitas ini sebesar Rp90.000 pada tanggal 24 Oktober 2024, 30 Oktober 2024, 28 November 2024, 16 Desember 2024, 31 Januari 2025, 26 Februari 2025, 17 Maret 2025, 21 Mei 2025, 24 Juli 2025, 30 Juli 2025, 25 Agustus 2025, 3 September 2025, 19 September 2025, 15 Oktober 2025, 29 Oktober 2025, 28 November 2025, dan 9 Desember 2025 masing-masing sebesar Rp18.000, Rp12.000, Rp20.000, Rp15.000, Rp10.000, Rp10.000, Rp10.000, Rp10.000, Rp10.000, Rp10.000, Rp12.000, Rp7.000, Rp10.000, Rp10.000, Rp11.000, Rp10.000, dan Rp15.000.

Fasilitas ini memiliki jatuh tempo 36 bulan sejak tanggal penarikan masing-masing yaitu pada tanggal tanggal 24 Oktober 2027, 30 Oktober 2027, 28 November 2027, 16 Desember 2027, 31 Januari 2028, 26 Februari 2028, 17 Maret 2028, 21 Mei 2028, 24 Juli 2028, 30 Juli 2028, 25 Agustus 2028, 3 September 2028, 19 September 2028, 15 Oktober 2028, 29 Oktober 2028, 28 November 2028, dan 9 Desember 2030.

Pada tanggal 31 Desember 2025 dan 2024, saldo pinjaman fasilitas tersebut masing-masing sebesar Rp158.861 dan Rp62.778.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

PT Bank of India Indonesia Tbk

On 15 October 2024, BNIMF obtained a working capital loan facility with PT Bank of India Indonesia Tbk, with a maximum facility amount of Rp200,000 and a loan term of 42 months.

Interest rate of the borrowing was 7.75% for withdrawal during 31 December 2025 and 31 December 2024.

BNIMF has utilized this facility in the amount of Rp90,000 on 24 October 2024, 30 October 2024, 28 November 2024, 16 December 2024, 31 January 2025, 26 February 2025, 17 March 2025, 21 May 2025, 24 July 2025, 30 July 2025, 25 August 2025, 3 September 2025, 19 September 2025, 15 October 2025, 29 October 2025, 28 November 2025, and 9 December 2025 and 29 October 2025 with amounts of Rp18,000, Rp12,000, Rp20,000, Rp15,000, Rp10,000, Rp10,000, Rp10,000, Rp10,000, Rp10,000, Rp10,000, Rp12,000, Rp7,000, Rp10,000, Rp10,000, Rp11,000, Rp10,000, and Rp15,000.

This facility has a maturity of 36 months from the date of each withdrawal, which is on 24 October 2027, 30 October 2027, 28 November 2027, 16 December 2027, 31 January 2028, 26 February 2028, 17 March 2028, 21 May 2028, 24 July 2028, 30 July 2028, 25 August 2028, 3 September 2028, 19 September 2028, 15 October 2028, 29 October 2028, 28 November 2028, and 9 December 2030.

As of 31 December 2025 and 2024, the loan balance of the facility was Rp158,861 and Rp62,778, respectively.

32. PINJAMAN YANG DITERIMA (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Lain-lain (lanjutan)

PT BNI Multifinance (BNIMF): (lanjutan)

Pada tanggal 31 Desember 2025, BNIMF telah memenuhi seluruh persyaratan penting atas pinjaman dari bank-bank pemberi pinjaman, kecuali atas beberapa rasio seperti, rasio pinjaman, *net credit loss*, NPF, *gearing*, *debt to equity* dari perjanjian pinjaman dengan beberapa bank-bank pemberi pinjaman.

Para kreditur terkait telah menyetujui untuk mengesampingkan kewajiban memenuhi rasio keuangan tersebut untuk tahun 2025.

Atas ketidakpatuhan terhadap persyaratan-persyaratan tersebut, BNIMF tidak diperkenankan untuk melakukan penarikan tambahan atas fasilitas yang telah ada dan/atau mengajukan fasilitas baru sampai dengan terpenuhinya kembali persyaratan yang ditetapkan. Ketidakpatuhan ini tidak menyebabkan porsi jangka panjang dari pinjaman-pinjaman terkait harus diklasifikasikan sebagai liabilitas jangka pendek.

***32. BORROWINGS** (continued)*

***a. By type and currency** (continued)*

***Others** (continued)*

***PT BNI Multifinance (BNIMF):** (continued)*

As at 31 December 2025, BNIMF had complied with all material covenants under its loan agreements with the lending banks, except for certain ratios including loan ratio, net credit loss, NPF (non-performing financing), gearing ratio and debt-to-equity ratio under the loan agreements with several lending banks.

The creditors have approved to waive the financial ratio covenants for the year 2025.

As a result of the non-compliance with these covenants, BNIMF is not permitted to make additional withdrawals under the existing facilities and/or to apply for new facilities until the covenants are again fulfilled. This non-compliance does not cause the non-current portion of the related borrowings to be reclassified as current liabilities.

b. Berdasarkan hubungan / ***b. By relationship***

	2025	2024	
Pihak berelasi			***Related parties***
Rupiah	1,374,269	1,525,707	*Rupiah*
Mata uang asing	53,744	48,504	*Foreign currencies*
Total pihak berelasi	1,428,013	1,574,211	*Total related parties*
Pihak ketiga			***Third parties***
Rupiah	1,689,335	1,385,376	*Rupiah*
Mata uang asing	35,923,039	39,971,857	*Foreign currencies*
Total pihak ketiga	37,612,374	41,357,233	*Total third parties*
	39,040,387	**42,931,444**	

32. PINJAMAN YANG DITERIMA (lanjutan) / *32. BORROWINGS (continued)*

c. Tingkat suku bunga per tahun / *c. Annual interest rates*

	Rupiah %	Dolar Amerika Serikat/*United States Dollar* %	*Dolar Singapura/ Singapore Dollar* %	*Won Korea Selatan/South Korean Won* %	*Dolar Australia/ Australian Dollar* %	*Euro Europa/ European Euro* %	
2025	5.08 - 9.00	4.06 - 8.00	1.85	-	4.35 - 4.57	2.34 - 2.40	*2025*
2024	7.18 - 9.50	4.52 - 6.00	3.86	3.60	5.26	3.07 - 3.18	*2024*

33. EFEK-EFEK SUBORDINASI / *33. SUBORDINATED SECURITIES*

	2025		2024		
	Saldo/ *Balance*	Peringkat/ *Rating*	Saldo/ *Balance*	Peringkat/ *Rating*	
BNI *Tier 2 Subordinated Notes* setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp265 pada tanggal 31 Desember 2025 dan Rp1.303 pada tanggal 31 Desember 2024	8,337,235	Ba2*) BB+**)	8,046,197	Ba2*) BB**)	*BNI Tier 2 Subordinated Notes, net of unamortised issuance cost amounting to Rp265 as of 31 December 2025 and Rp1,303 as of 31 December 2024*
BNI *Additional Tier 1 Capital Securities* setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp2.247 pada tanggal 31 Desember 2025 dan Rp4.014 pada tanggal 31 Desember 2024	10,002,753	Ba3*)	9,652,986	Ba3*)	*BNI Additional Tier 1, net of unamortised issuance cost amounting to Rp2,247 as of 31 December 2025 and Rp4,014 as of 31 December 2024*
	18,339,988		**17,699,183**		

*) *Moody's*
**) *Fitch*

BNI *Tier 2 Subordinated Notes* / *BNI Tier 2 Subordinated Notes*

Pada tanggal 30 Maret 2021, BNI telah menerbitkan *Tier 2 Subordinated Notes (*BNI *Tier 2 Capital Bond* 2021*)* sebesar USD500 juta jangka waktu 5 tahun, dengan kupon sebesar 3,75% per tahun yang dibayarkan setiap semester, dan tercatat di *Singapore Exchange*. *Tier 2 Subordinated Notes* dapat dicatat sebagai komponen modal pelengkap (*Tier* 2) sesuai persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-64/PB.31/2021 tanggal 31 Maret 2021.

On 30 March 2021, BNI has issued Tier 2 Subordinated Notes (BNI Tier 2 Capital Bond 2021) with total nominal value of USD500 million with the term of 5 years and coupon of 3.75% per annum paid on semi-annual basis, and listed in Singapore Exchange. Tier 2 Subordinated Notes can be treated as supplementary capital components (Tier 2) according to the approval from Financial Services Authority through letter No. S-64/PB.31/2021 dated 31 March 2021.

Pada tanggal 31 Desember 2025, BNI *Tier 2 Capital Bond* 2021 memiliki nilai bersih sebesar Rp8.337.235 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp265 (31 Desember 2024: Rp8.046.197).

As of 31 December 2025, the net value of BNI Tier 2 Capital Bond 2021 was Rp8,337,235 after deducting unamortised issuance cost amounted Rp265 (31 December 2024: Rp8,046,197).

Penggunaan dana hasil penerbitan *Tier 2 Subordinated Notes* digunakan oleh BNI untuk memperkuat modal pelengkap (*tier* 2) dan modal kerja dalam rangka pengembangan usaha terutama pemberian kredit serta peningkatan komposisi struktur dana jangka panjang, sesuai dengan Peraturan OJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum sebagaimana telah diubah dengan Peraturan OJK No. 34/POJK.03/2016 dan selanjutnya akan digunakan oleh BNI untuk mendukung peningkatan aset produktif.

The proceeds from Tier 2 Subordinated Notes issuance was used by BNI to strengthen tier 2 capital and working capital in the context of business development, especially loan disbursement and increase in the composition of the long-term fund structure, in accordance with OJK Regulation No. 11/POJK.03/2016 concerning the Minimum Capital Requirement for Commercial Banks as amended by OJK Regulation No. 34/POJK.03/2016 and will then be used by BNI to support increase in productive assets.

33. EFEK-EFEK SUBORDINASI (lanjutan)

BNI *Tier 2 Subordinated Notes* (lanjutan)

Per tanggal 31 Desember 2025, BNI telah memperoleh hasil pemeringkatan atas *Tier* 2 *Subordinated Notes* dari Moody's dan Fitch dengan peringkat masing-masing Ba2 dan BB+. Pada tanggal 30 April 2025, Fitch menaikkan peringkat *Tier 2 Subordinated Notes* menjadi BB+. Per tanggal 31 Desember 2024, BNI memperoleh hasil pemeringkatan atas *Tier 2 Subordinated Notes* dari Moody's dan Fitch dengan peringkat masing-masing Ba2 dan BB.

Tier 2 Subordinated Notes ini dapat mengalami *write down* dan ditangguhkan pembayaran pokok dan bunganya apabila OJK menetapkan bahwa BNI berpotensi terganggu kelangsungan usahanya *(point of non-viability)* sesuai dengan peraturan OJK No. 11/POJK.03/2016 yang diubah dengan peraturan OJK No. 34/POJK.03/2016. *Point of non-viability* terjadi akibat bank mencapai *trigger level* pada indikator permodalan yang ditetapkan OJK, sesuai SEOJK No. 20/SEOJK.03/2016 Fitur Konversi Menjadi Saham Biasa atau *Write Down* terhadap Instrumen Modal Inti Tambahan dan Modal Pelengkap.

BNI *Additional Tier 1 Capital Securities*

Pada tanggal 24 September 2021, BNI telah menerbitkan *Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021*) sebesar nilai nominal USD600 juta dan tidak memiliki jangka waktu, dengan opsi *call* 5,5 tahun, dengan kupon sebesar 4,30% per tahun yang dibayarkan setiap semester, dan tercatat di *Singapore Exchange*. *Additional Tier 1 Capital Securities* dapat dicatat sebagai komponen modal inti tambahan (*Additional Tier 1*) sesuai persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-210/PB.31/2021 tanggal 30 September 2021.

Pada tanggal 31 Desember 2025, BNI *Additional Tier 1 Capital Bond* 2021 memiliki nilai bersih sebesar Rp10.002.753 setelah dikurangi biaya penerbitan yang belum diamortisasi sebesar Rp2.247 (31 Desember 2024: Rp9.652.986).

Pada tanggal 31 Desember 2025 dan 2024, BNI telah memperoleh hasil pemeringkatan atas *Additional Tier 1 Capital Securities* dari Moody's dengan peringkat Ba3.

Additional Tier 1 Capital Securities yang diterbitkan telah mengikuti persyaratan POJK No. 11/POJK.03/2016 (Pasal 15) sehingga instrumen keuangan tersebut dapat dikategorikan sebagai Modal Inti Tambahan (*Additional Tier 1*). Namun, terdapat klausul *mandatory redemption - redemption for a capital trigger event* ketika CAR BNI mencapai rasio tertentu maka Bank harus melakukan pelunasan terhadap sisa pokok dan bunga dari AT-1. Oleh karena itu, Bank mencatat BNI *Additional Tier 1 Capital Securities* ini sebagai instrumen liabilitas pada laporan keuangan konsolidasian.

***33. SUBORDINATED SECURITIES** (continued)*

***BNI Tier 2 Subordinated Notes** (continued)*

As of 31 December 2025, BNI received ratings for the Tier 2 Subordinated Notes from Moody's and Fitch with ratings of Ba2 and BB+, respectively. On 30 April 2025, Fitch upgraded the rating of the Tier 2 Subordinated Notes to BB+. As of 31 December 2024, BNI obtained the rating of Tier 2 Subordinated Notes from Moody's and Fitch with Ba2 and BB rating, respectively.

This Tier 2 Subordinated Notes can experience write down and the payment of principal and interest will be postponed if the OJK stipulates that BNI has the potential to be subject to business continuity issues (point of non-viability) in accordance with OJK regulations No. 11/POJK.03/2016 amended by OJK regulation No. 34/POJK.03/2016. Point of non-viability occurs due to a bank achieving a trigger level in the capital indicator set by OJK, according to SEOJK No. 20/SEOJK.03/2016 Conversion Features into Common Shares or Write Down of Additional Core Capital Instruments and Supplementary Capital.

BNI Additional Tier 1 Capital Securities

On 24 September 2021, BNI has issued Additional Tier 1 Capital Securities (BNI Additional Tier 1 Capital Bond 2021) with total nominal value of USD600 million perpetual non callable 5.5 years and coupon of 4.30% per annum paid on semi-annual basis, and listed in Singapore Exchange. Additional Tier 1 Capital Securities can be treated as supplementary capital components (Additional Tier 1) according to the approval from Financial Services Authority through letter No. S-210/PB.31/2021 dated 30 September 2021.

As of 31 December 2025, the net value of BNI Additional Tier 1 Capital Bond 2021 was Rp10,002,753 after deducting unamortised issuance cost amounted Rp2,247 (31 December 2024: Rp9,652,986).

As of 31 December 2025 and 2024, BNI obtained the rating of Additional Tier 1 Capital Securities from Moody's with Ba3 rating.

Additional Tier 1 Capital Securities issued has comply in accordance with OJK Regulation No. 11/POJK.03/2016 (Article 15) hence the financial instrument can be categorised as supplementary capital components (Additional Tier 1). However, there is a mandatory redemption clause - redemption for a capital trigger event when BNI's CAR reaches a certain ratio, the Bank shall pay off the remaining principal and interest from AT-1. Therefore, the Bank recorded this BNI Additional Tier 1 Capital Securities as a liability instrument in the consolidated financial statements.

33. EFEK-EFEK SUBORDINASI (lanjutan)

BNI *Additional Tier 1 Capital Securities* (lanjutan)

Additional Tier 1 Capital Securities ini dapat mengalami *write down* dan ditangguhkan pembayaran pokok dan bunganya apabila OJK menetapkan bahwa BNI berpotensi terganggu kelangsungan usahanya *(point of non-viability)* sesuai dengan peraturan OJK No. 11/POJK.03/2016 yang diubah dengan peraturan OJK No. 34/POJK.03/2016. *Point of non-viability* terjadi akibat bank mencapai *trigger level* pada indikator permodalan yang ditetapkan OJK, sesuai SEOJK No. 20/SEOJK.03/2016 Fitur Konversi Menjadi Saham Biasa atau *Write Down* terhadap Instrumen Modal Inti Tambahan dan Modal Pelengkap.

33. SUBORDINATED SECURITIES (continued)

***BNI Additional Tier 1 Capital Securities** (continued)*

This Additional Tier 1 Capital Securities can experience write down and the payment of principal and interest will be postponed if the OJK stipulates that BNI has the potential to be subject to business continuity issues (point of non-viability) in accordance with OJK regulations No. 11/POJK.03/2016 amended by OJK regulation No. 34/POJK.03/2016. Point of non-viability occurs due to a bank achieving a trigger level in the capital indicator set by OJK, according to SEOJK No. 20/SEOJK.03/2016 Conversion Features into Common Shares or Write Down of Additional Core Capital Instruments and Supplementary Capital.

34. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR

Modal saham

Pada tanggal-tanggal 31 Desember 2025 dan 2024, kepemilikan modal saham BNI adalah sebagai berikut:

34. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL

Share capital

As of 31 December 2025 and 2024, BNI's share capital ownership are as follows:

	2025			
Pemegang saham	**Jumlah lembar saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan (%)/ *Percentage of ownership (%)***	**Jumlah/ *Amount***	***Shareholders***
Saham Seri A Dwiwarna				*Class A Dwiwarna share*
Negara Republik Indonesia melalui Kementerian BUMN	1	-	-	*Republic of Indonesia through the Ministry of State-Owned Enterprises (BUMN)*
Saham Seri B				*Class B shares*
PT Danantara Asset Management (Persero)	434,012,799	1.16	1,627,548	*PT Danantara Asset Management (Persero)*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	144,670,934	0.39	542,516	*Public (ownership less than 5% each)*
Total saham Seri B	578,683,733	1.55	2,170,064	*Total Class B shares*
Saham Seri C				*Class C shares*
PT Danantara Asset Management (Persero)	21,944,374,950	58.84	4,114,570	*PT Danantara Asset Management (Persero)*
Perseroan terbatas (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	2,080,877,399	5.58	390,165	*Limited liability company (ownership less than 5% each)*
Badan usaha asing (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	8,692,652,093	23.31	1,629,872	*Foreign investment entities (ownership less than 5% each)*
Putrama Wahju Setyawan (Direktur)	5,997,426	0.02	1,125	*Putrama Wahju Setyawan (Director)*
Ronny Venir (Direktur)	5,546,296	0.01	1,040	*Ronny Venir (Director)*
Corina Leyla Karnalies (Direktur)	5,513,174	0.01	1,034	*Corina Leyla Karnalies (Director)*
David Pirzada (Direktur)	4,866,684	0.01	913	*David Pirzada (Director)*
Toto Prasetio (Direktur)	4,222,896	0.01	792	*Toto Prasetio (Director)*
Hussein Paolo Kartadjoemena (Direktur)	3,075,911	0.01	577	*Hussein Paolo Kartadjoemena (Director)*
Muhammad Iqbal (Direktur)	3,064,085	0.01	575	*Muhammad Iqbal (Director)*
Agung Prabowo (Direktur)	1,915,356	0.01	359	*Agung Prabowo (Director)*
Rian Eriana Kaslan (Direktur)	802,397	0.00	150	*Rian Eriana Kaslan (Director)*
Eko Setyo Nugroho (Direktur)	311,797	0.00	58	*Eko Setyo Nugroho (Director)*
Donny Hutabarat (Komisaris)	200	0.00	-*)	*Donny Hutabarat (Commissioner)*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	3,965,408,518	10.63	743,514	*Public (ownership less than 5% each)*
Total saham Seri C	36,718,629,182	98.45	6,884,743	*Total Class C shares*
Total	**37,297,312,916**	**100.00**	**9,054,807**	***Total***

34. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

34. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL (continued)

Modal saham (lanjutan)

***Share Capital** (continued)*

Pada tanggal-tanggal 31 Desember 2025 dan 2024, kepemilikan modal saham BNI adalah sebagai berikut: (lanjutan)

As of 31 December 2025 and 2024, BNI's share capital ownership are as follows: (continued)

	2024			
Pemegang saham	**Jumlah lembar saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan (%)/ *Percentage of ownership (%)***	**Jumlah/ *Amount***	***Shareholders***
Saham Seri A Dwiwarna				*Class A Dwiwarna share*
Negara Republik Indonesia	1	-	-	*Republic of Indonesia*
Saham Seri B				*Class B shares*
Negara Republik Indonesia	434,012,799	1.16	1,627,548	*Republic of Indonesia*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	144,670,934	0.39	542,516	*Public (ownership less than 5% each)*
Total saham Seri B	578,683,733	1.55	2,170,064	*Total Class B shares*
Saham Seri C				*Class C shares*
Negara Republik Indonesia	21,944,374,950	58.84	4,114,570	*Republic of Indonesia*
Perseroan terbatas (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	1,207,509,576	3.24	226,408	*Limited liability company (ownership less than 5% each)*
Badan usaha asing (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	9,786,139,529	26.24	1,834,901	*Foreign investment entities (ownership less than 5% each)*
Putrama Wahju Setyawan (Direktur)	3,879,526	0.01	727	*Putrama Wahju Setyawan (Director)*
Royke Tumilaar (Direktur)	3,656,941	0.01	686	*Royke Tumilaar (Director)*
Ronny Venir (Direktur)	3,539,596	0.01	664	*Ronny Venir (Director)*
Corina Leyla Karnalies (Direktur)	3,506,474	0.01	657	*Corina Leyla Karnalies (Director)*
Novita Widya Anggraini (Direktur)	3,143,884	0.01	589	*Novita Widya Anggraini (Director)*
David Pirzada (Direktur)	2,859,984	0.01	536	*David Pirzada (Director)*
Mucharom (Direktur)	2,541,148	0.01	476	*Mucharom (Director)*
Toto Prasetio (Direktur)	2,163,696	0.01	406	*Toto Prasetio (Director)*
Askolani (Komisaris)	1,752,462	0.00	329	*Askolani (Commissioner)*
Fadlansyah Lubis (Komisaris)	986,860	0.00	185	*Fadlansyah Lubis (Commissioner)*
Hussein Paolo Kartadjoemena (Direktur)	918,611	0.00	172	*Hussein Paolo Kartadjoemena (Director)*
Robertus Billitea (Komisaris)	864,066	0.00	162	*Robertus Billitea(Commissioner)*
Pahala Nugraha Mansury (Komisaris)	677,291	0.00	127	*Pahala Nugraha Mansury (Commissioner)*
I Made Sukajaya (Direktur)	576,912	0.00	108	*I Made Sukajaya (Director)*
Agung Prabowo (Direktur)	101,356	0.00	19	*Agung Prabowo (Director)*
Masyarakat (kepemilikan masing-masing dibawah 5% untuk setiap pihak)	3,749,436,320	10.05	703,021	*Public (ownership less than 5% each)*
Total saham Seri C	36,718,629,182	98.45	6,884,743	*Total Class C shares*
Total	**37,297,312,916**	**100.00**	**9,054,807**	***Total***

34. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

Modal saham (lanjutan)

Saham Seri A Dwiwarna adalah saham yang memberikan hak-hak preferen kepada pemegangnya untuk menyetujui pengangkatan dan pemberhentian Komisaris dan Direksi, perubahan Anggaran Dasar, menyetujui pembubaran dan likuidasi, penggabungan, dan pengambil alihan BNI dan semua hak-hak lainnya yang dimiliki saham Seri B dan saham Seri C. Saham Seri A Dwiwarna tidak dapat dialihkan kepada pihak lain.

Saham Seri B dan Saham Seri C adalah saham biasa atas nama yang memiliki hak yang sama.

Pada tanggal 13 Agustus 2007, Pemerintah Republik Indonesia, melakukan divestasi sebesar 3.475.231.980 saham Seri C, mewakili 22,54% dari kepemilikan di BNI melalui Penawaran Umum Saham Kedua.

Sesuai Keterbukaan Informasi dalam upaya stabilisasi harga pasar saham di tengah kondisi perekonomian regional dan global yang mengalami tekanan dan perlambatan, Bank telah melakukan Pembelian Kembali Saham Perseroan yang telah dikeluarkan dan tercatat di Bursa Efek Indonesia (“BEI”). Program ini mengacu pada Peraturan OJK No. 2/POJK.04/2013 tanggal 26 Agustus 2013 tentang Pembelian Kembali Saham yang Dikeluarkan oleh Emiten atau Perusahaan Publik dalam Kondisi Pasar yang Berfluktuasi Secara Signifikan (“POJK No. 2/POJK.04/2013”) dan Surat Edaran OJK No. 3/SEOJK.04/2020 tanggal 9 Maret 2020 tentang Kondisi Lain sebagai Kondisi Pasar yang Berfluktuasi Secara Signifikan dalam Pelaksanaan Pembelian Kembali Saham yang Dikeluarkan oleh Emiten atau Perusahaan Publik.

Pembelian kembali saham Bank telah dilaksanakan pada tanggal 22 Juli 2021 sampai dengan 21 Oktober 2021, sesuai dengan tanggal Keterbukaan Informasi. Bank melakukan pembelian kembali Saham Seri C sejumlah 246.826 lot atau sebanyak 24.682.600 lembar saham dengan rata-rata biaya perolehan rata-rata sebesar Rp5.186,90 (nilai penuh) per lembar saham.

34. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL *(continued)*

Share capital *(continued)*

The Class A Dwiwarna share is a share that gives the holder preferred rights to approve the appointment and dismissal of Commissioners and Directors, amend the Articles of Association, approve the dissolution and liquidation, merger, and takeover of BNI and all other rights of Class B and Class C shares. The Class A Dwiwarna share may not be transferred to other parties.

Class B and Class C shares are ordinary shares that have the same rights.

On 13 August 2007, the Government of the Republic of Indonesia divested 3,475,231,980 Class C shares, representing 22.54% of shareholding in BNI through a Second Initial Public Offering (IPO).

In accordance with the Disclosure of Information in relation to the stabilisation of stock market price amidst stressful and slowing regional and global economy, the Bank repurchased shares issued by the Bank listed in the Indonesia Stock Exchange ("IDX"). This program is consistent with Regulation of Financial Services Authority ("OJK") No. 2/POJK.04/2013 dated 26 August 2013 on the Repurchase of Shares Issued by the Issuers or Public Companies in Significant Fluctuating Market Conditions ("POJK No. 2/POJK.04/2013") and OJK Circular Letter No. 3/SEOJK.04/2020 dated 9 March 2020 on Other Conditions as Significant Fluctuating Market Conditions in the Implementation of Shares Buyback Issued by Issuers or Public Companies.

The repurchase of shares was executed on 22 July 2021 to 21 October 2021, consistent with the date of Disclosure of Information. The Bank repurchased 246,826 lots of Class C Shares, or 24,682,600 shares with an average acquisition cost amounting to Rp5,186.90 (full amount) per share.

34. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

Modal saham (lanjutan)

Pada tahun 2022, Bank melakukan alokasi saham treasuri senilai Rp207.475 sebagai Program Kepemilikan Saham bagi Manajemen dan Pegawai Bank dalam bentuk Saham Bonus (lihat Catatan 44).

Pembelian kembali saham Bank telah dilaksanakan pada tanggal 12 Juli 2023 sampai dengan 1 Agustus 2023. Bank melakukan pembelian kembali Saham sejumlah 202.573 lot atau sebanyak 20.257.300 lembar saham dengan rata-rata biaya perolehan rata-rata sebesar Rp8.883,71 (nilai penuh) per lembar saham.

Pemecahan nilai nominal saham BNI

Berdasarkan keputusan RUPSLB tanggal 19 September 2023 yang dituangkan dalam Akta No. 18, tanggal 19 September 2023, yang dibuat dihadapan Ashoya Ratam S.H., M.KN, pemegang saham BNI antara lain menyetujui pemecahan nilai nominal saham *(stock split)* Bank dengan rasio 1:2 yang berlaku efektif pada tanggal 10 Oktober 2023. Sehingga:

a. Nilai nominal per Saham Seri A Dwiwarna dan Seri B dari sebesar Rp7.500 (nilai penuh) menjadi Rp3.750 (nilai penuh) dengan ketentuan:
   i. 1 (satu) saham Seri A Dwiwarna tetap dipertahankan sebagai saham Seri A Dwiwarna milik Negara Republik Indonesia dengan nilai nominal sebesar Rp3.750 (nilai penuh); dan
   ii. 1 (satu) saham Seri A Dwiwarna menjadi 1 (satu) saham saham Seri B milik Negara Republik Indonesia dengan nilai nominal sebesar Rp3.750 (nilai penuh).

b. Nilai nominal per Saham Seri C dari Rp375 (nilai penuh) menjadi Rp187,5 (nilai penuh).

34. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL *(continued)*

Share capital *(continued)*

In 2022, the Bank has allocated the treasury shares amounting Rp207,475 as Share Ownership Program for Management and Bank's Employees in the form of Share Bonus (refer to Note 44).

The repurchase of shares was executed on 12 July 2023 to 1 August 2023. The Bank repurchased 202,573 lots, or 20,257,300 shares with an average acquisition cost amounting to Rp8,883.71 (full amount) per share.

Stock split of BNI

Based on the decision of the Extraordinary General Meeting of Shareholders (RUPSLB) dated 19 September 2023, as stated in Deed No. 18 dated 19 September 2023, as recorded in the Notarial Deed of Ashoya Ratam, S.H., M.KN., the shareholders of BNI, among others, approved the nominal value split (stock split) of the bank with a ratio of 1:2, effective from 10 October 2023. Therefore:

a. The nominal value per Series A Dwiwarna and Series B shares, originally Rp7,500 (full amount), split to Rp3,750 (full amount), with the following conditions:
   i. 1 (one) Series A Dwiwarna share is retained as a full-nominal value Series A Dwiwarna share owned by the Republic of Indonesia with a nominal value of Rp3,750 (full amount); and
   ii. 1 (one) Series A Dwiwarna share is converted into 1 (one) Series B share owned by the Republic of Indonesia with a nominal value of Rp3,750 (full amount).

b. The nominal value per Series C share is split from Rp375 (full amount) to Rp187.5 (full amount).

34. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

Modal ditempatkan setelah pemecahan nilai nominal saham (*stock split*) berubah menjadi sebagai berikut:

a. Saham Seri A Dwiwarna - 1 lembar saham
b. Saham Seri B - 578.683.733 lembar saham
c. Saham Seri C - 36.678.114.582 lembar saham

Pengalihan kepemilikan saham Seri B dan seri C Bank milik Negara Republik Indonesia kepada PT Danantara Asset Management (Persero)

Pada tanggal 22 Maret 2025, Negara Republik Indonesia mengalihkan saham Seri B dan Seri C sejumlah 22.378.387.749 saham atau setara dengan 60,00% dari seluruh saham yang telah dikeluarkan dan disetor penuh Bank melalui mekanisme inbreng kepada PT Danantara Asset Management (Persero) (DAM).

DAM merupakan Perusahaan *Holding* Operasional sebagaimana diatur dalam Undang-Undang Nomor 1 Tahun 2025 tentang Perubahan Ketiga atas Undang-Undang Nomor 19 Tahun 2003 tentang Badan Usaha Milik Negara dan Peraturan Pemerintah Nomor 15 Tahun 2025 tentang Penambahan Penyertaan Modal Negara Republik Indonesia ke Dalam Modal Saham Perusahaan Perseroan (Persero) PT Danantara Asset Management (Persero) untuk Pendirian *Holding* Operasional (”PP 15/2025”).

Sesuai Pasal 3 PP 15/2025 diatur bahwa Negara Republik Indonesia tetap melakukan kontrol terhadap Bank.

Setelah terjadinya pengalihan kepemilikan saham tersebut, dengan demikian Negara Republik Indonesia memiliki 1 (satu) saham Seri A Dwiwarna, DAM memiliki 22.378.387.749 saham Seri B dan Seri C atau setara dengan 60,00%, dan masyarakat memiliki 14.918.925.166 saham Seri B dan seri C atau setara dengan 40,00%.

***34. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL** (continued)*

The issued capital after the nominal value split (stock split) changed as follows:

a. Series A Dwiwarna shares - 1 share
b. Series B shares - 578,683,733 shares
c. Series C shares - 36,678,114,582 shares.

Transfer of Ownership of Series B and Series C Shares of the Bank Held by the State of the Republic of Indonesia to PT Danantara Asset Management (Persero)

On 22 March 2025, the State of the Republic of Indonesia transferred its Series B and Series C shares, totaling 22,378,387,749 shares, representing 60.00% of the total issued and fully paid-up shares of the Bank, through an inbreng mechanism to PT Danantara Asset Management (Persero) (DAM).

DAM serves as an Operational Holding Company as stipulated in Law Number 1 of 2025 concerning the Third Amendment to Law Number 19 of 2003 concerning State-Owned Enterprises and Government Regulation Number 15 of 2025 concerning the Addition of State Capital Participation of the Republic of Indonesia into the Share Capital of the Limited Liability Company (Persero) PT Danantara Asset Management (Persero) for the Establishment of an Operational Holding Company ("Government Regulation 15/2025").

Article 3 of Government Regulation 15/2025 stipulates that the State of the Republic of Indonesia shall maintain control over the Bank.

Following the aforementioned transfer of share ownership, the State of the Republic of Indonesia holds 1 (one) Series A Dwiwarna share, DAM holds 22,378,387,749 Series B and Series C shares, representing 60.00%, and the public holds 14,918,925,166 Series B and Series C shares, representing 40.00%.

34. MODAL SAHAM DAN TAMBAHAN MODAL DISETOR (lanjutan)

34. SHARE CAPITAL AND ADDITIONAL PAID-IN CAPITAL (continued)

Tambahan modal disetor

Additional paid in capital

Perubahan tambahan modal disetor adalah sebagai berikut:

The movements in additional paid in capital are as follows:

Saldo pada tanggal 1 Januari 2010	591,156	*Balance as of 1 January 2010*
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas I pada tahun 2000 (lihat Catatan 1c)	56,883,826	*Additional paid in capital due to Right Issue I in 2000 (refer to Note 1c)*
	57,474,982	
Pengurangan tambahan modal disetor akibat pengembalian dana rekapitalisasi kepada pemerintah Indonesia (lihat Catatan 1d)	(581,474)	*Reduction of paid in capital due to refund of excess recapitalization funds to the Government of Indonesia (refer to Note 1d)*
	56,893,508	
Dieliminasi dengan akumulasi kerugian dalam rangka kuasi-reorganisasi per tanggal 30 Juni 2003 (lihat Catatan 1e)	(54,367,847)	*Elimination against accumulated losses in relation to the quasi-reorganization as of 30 June 2003 (refer to Note 1e)*
	2,525,661	
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas II pada tahun 2007 (lihat Catatan 1f)	3,287,218	*Additional paid in capital due to Right Issue II in 2007 (refer to Note 1f)*
Biaya emisi penerbitan saham	(195,280)	*Shares issuance cost*
	5,617,599	
Tambahan modal disetor akibat Penawaran Umum Saham Terbatas III pada tahun 2010 (lihat Catatan 1g)	9,196,100	*Additional paid in capital due to Right Issue III in 2010 (refer to Note 1g)*
Biaya emisi penerbitan saham	(245,231)	*Shares issuance cost*
	14,568,468	
Tambahan modal disetor akibat penyertaan saham pada PT Bank Syariah Indonesia Tbk pada tahun 2021	2,441,786	*Additional paid in capital due to equity investment at PT Bank Syariah Indonesia Tbk in 2021*
	17,010,254	

35. PENGGUNAAN LABA BERSIH

35. APPROPRIATION OF NET INCOME

Berdasarkan keputusan Rapat Umum Pemegang Saham Tahunan tanggal 26 Maret 2025 dan 4 Maret 2024, pengalokasian laba bersih masing-masing untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

In accordance with the resolutions of the Annual General Shareholders' Meetings held on 26 March 2025 and 4 March 2024, the allocation of the net income for the years ended 31 December 2025 and 2024, respectively, are as follows:

	2024	**2023**	
Pembagian dividen	13,951,339	10,454,738	*Distribution of dividends*
Saldo laba	7,512,260	10,454,738	*Retained earnings*
	21,463,599	**20,909,476**	

Rapat Umum Pemegang Saham telah menyetujui pembagian dividen dari laba bersih tahun 2024 dan 2023, sebesar Rp13.951.339 pada tanggal 26 Maret 2025 dan Rp10.454.738 pada tanggal 4 Maret 2024.

General Shareholders' meeting has approved the dividend distribution of Rp13,951,339 and Rp10,454,738 from the 2024 net income on 26 March 2025 and 2023 net income on 4 March 2024.

36. CADANGAN UMUM DAN WAJIB

Cadangan umum dan wajib pada awalnya dibentuk dalam rangka memenuhi ketentuan Pasal 61 ayat (1) Undang-undang No. 1/1995 mengenai Perseroan Terbatas (kemudian diganti dengan Undang-undang Perseroan Terbatas No. 40/2007 pasal 70), yang mengharuskan perusahaan Indonesia untuk membuat penyisihan cadangan umum dan wajib sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-undang tersebut tidak mengatur jangka waktu untuk pembentukan penyisihan tersebut.

36. GENERAL AND LEGAL RESERVES

The general and legal reserves were originally provided in accordance with Indonesian Limited Liability Company Law No. 1/1995 Article 61 paragraph (1) (later superseded by Limited Liability Company Law No. 40/2007 Article 70), which requires Indonesian companies to set up a general and legal reserve amounting to at least 20% of the issued and paid-up share capital. This particular law does not regulate the period of time in relation to the provision of such reserves.

37. CADANGAN KHUSUS

Cadangan khusus terdiri dari cadangan yang dibentuk dalam rangka tujuan investasi dan *legal reserve* dari cabang luar negeri.

Sehubungan dengan adanya penerapan Peraturan Otoritas Jasa Keuangan (POJK) No. 34/POJK.03/2016 tanggal 22 September 2016 tentang Perubahan atas POJK No. 11/POJK.03/2016 tentang "Kewajiban Penyediaan Modal Minimum" yang mulai berlaku pada tanggal 26 September 2016 ("tanggal diberlakukannya"), untuk menjaga struktur permodalannya, Bank telah melakukan reklasifikasi atas saldo laba yang sudah ditentukan penggunaannya (cadangan khusus) sebesar Rp5.613.100 dan cadangan cabang luar negeri sebesar Rp92.276 per 31 Desember 2016, menjadi laba ditahan yang tidak ditentukan penggunaannya.

Reklasifikasi atas saldo laba tersebut telah mendapatkan persetujuan melalui berita acara Rapat Umum Pemegang Saham Tahunan No. 42 tanggal 16 Maret 2017.

37. SPECIFIC RESERVES

Specific reserves consist of reserve for investment purposes and legal reserve from overseas branches.

In relation with implementation of Regulation of the Financial Services Regulatory Authority (POJK) No. 34/POJK.03/2016 dated 22 September 2016 on Amendments to POJK No. 11/POJK.03/2016 concerning "Minimum Capital Requirement for Commercial Bank" which came into force on 26 September 2016 ("date of enactment"), to maintain its capital structure, the Bank has reclassified retained earnings that has been appropriated (specific reserve) amounting to Rp5,613,100 and reserve of overseas branch amounting to Rp92,276 as of 31 December 2016 into the unappropriated retained earnings.

The reclassification of retained earnings has been approved through Annual General Shareholders Meeting No. 42 dated 16 March 2017.

38. PENDAPATAN BUNGA

38. INTEREST INCOME

	2025	2024	
Pinjaman yang diberikan	57,957,360	55,680,548	*Loans*
Obligasi Pemerintah	7,204,618	6,463,839	*Government Bonds*
Penempatan pada bank lain dan Bank Indonesia	2,413,743	2,281,994	*Placements with other banks and Bank Indonesia*
Wesel ekspor dan tagihan lainnya	1,056,843	1,133,565	*Bills and other receivables*
Efek-efek	752,171	781,391	*Marketable securities*
Lain-lain	9,419	241,773	*Others*
	69,394,154	**66,583,110**	

Pada tanggal 31 Desember 2025 dan 2024, termasuk dalam pendapatan bunga di atas adalah pendapatan dari pihak berelasi terkait transaksi Obligasi Pemerintah dan SPN masing-masing sebesar Rp7.140.673 dan Rp6.401.737.

As of 31 December 2025 and 2024, include in interest income is income from related parties related to Government Bonds and SPN transactions amounting to Rp7,140,673 and Rp6,401,737, respectively.

39. BEBAN BUNGA / *39. INTEREST EXPENSE*

	2025	2024	
Simpanan nasabah dan bank lain	24,411,420	21,275,769	*Deposits from customers and other banks*
Pinjaman yang diterima	3,093,095	3,483,211	*Borrowings*
Efek-efek yang diterbitkan	1,543,298	1,333,785	*Securities issued*
Lain-lain	13,146	10,140	*Others*
	29,060,959	**26,102,905**	

40. BEBAN GAJI DAN TUNJANGAN / *40. SALARIES AND EMPLOYEES' BENEFITS EXPENSE*

	2025	2024*)	
Gaji dan upah	6,740,492	6,550,301	*Salaries and wages*
Tunjangan kesejahteraan pegawai	3,979,228	3,578,129	*Employee welfare allowance*
Bonus, insentif dan tantiem	3,048,536	2,888,867	*Bonus, incentives and tantiem*
Pendidikan dan pelatihan	217,865	249,222	*Training and development*
Lainnya	543,083	514,988	*Others*
	14,529,204	**13,781,507**	

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

Sesuai dengan kebijakan Bank, selain gaji, pegawai juga mendapatkan fasilitas dan tunjangan berupa Tunjangan Hari Raya (THR), fasilitas kesehatan, sumbangan kematian, tunjangan cuti, fasilitas jabatan untuk jabatan tertentu, program pensiun untuk pegawai tetap, insentif sesuai dengan kinerja Bank dan pegawai, dan manfaat untuk pegawai yang berhenti bekerja sesuai dengan Undang-Undang Ketenagakerjaan yang berlaku.

Under the Bank's policy, in addition to salaries, employees are entitled to allowances and benefits, such as yearly allowance (THR), medical reimbursements, death allowance, leave allowance, functional allowance for certain levels, pension plan for permanent employees, incentives based on the Bank and employees' performance, and post-employment benefits in accordance with prevailing Labor Law.

Informasi mengenai beban gaji dan tunjangan kepada pihak-pihak berelasi diungkapkan pada Catatan 46w.

Information related to salaries and employees' benefits expense to related parties are disclosed in Note 46w.

41. BEBAN UMUM DAN ADMINISTRASI / *41. GENERAL AND ADMINISTRATIVE EXPENSES*

	2025	2024*)	
Penyusutan (Catatan 19)	2,619,359	2,416,792	*Depreciation (Note 19)*
Beban tenaga alih daya	1,790,010	1,716,120	*Outsourcing expenses*
Komunikasi	1,531,621	1,445,367	*Communications*
Perlengkapan kantor	808,793	723,776	*Office supplies*
Biaya sewa	695,137	667,277	*Rental expenses*
Perbaikan dan pemeliharaan	680,537	650,414	*Repairs and maintenance*
Transportasi	388,128	372,316	*Transportation*
Listrik dan air	298,574	312,114	*Electricity and water*
Jasa profesional	265,689	334,276	*Professional services*
Penelitian dan pengembangan	123,757	95,475	*Research and development*
Teknologi informasi	26,957	30,468	*Information technology*
Beban lain-lain	166,172	261,087	*Other expenses*
	9,394,734	**9,025,482**	

*) Disajikan kembali (lihat Catatan 60)

*) *Restated (see Note 60)*

42. IMBALAN KERJA / *42. EMPLOYEE BENEFITS*

	2025	2024	
Imbalan kerja jangka pendek	3,922,866	3,230,142	*Short-term employee benefits*
Imbalan pasca kerja jangka panjang			*Long-term employee benefits*
Program pensiun manfaat pasti	1,828,215	1,096,813	*Defined benefit pension plan*
Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya	3,087,914	2,819,762	*Post employment benefits and other long-term employee benefits*
	4,916,129	3,916,575	
	8,838,995	**7,146,717**	

Program dana pensiun Bank ini dikelola oleh Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun"). Kontribusi pegawai adalah sebesar 7,5% dari penghasilan dasar pensiun karyawan dan sisa jumlah yang diperlukan untuk mendanai program tersebut ditanggung oleh BNI.

The pension plan of the Bank is managed by Dana Pensiun PT Bank Negara Indonesia (Persero) Tbk ("Dana Pensiun"). The employees' contributions are 7.5% of the employee's pension salary-based and the remaining amounts required to fund the program/pension plan are contributed by BNI.

Program pensiun manfaat pasti / ***Defined benefit pension plan***

Penilaian aktuaria atas manfaat pensiun pada tahun yang berakhir tanggal 31 Desember 2025 dan 2024, dilakukan oleh perusahaan konsultan aktuaria terdaftar independen, PT Towers Watson Purbajaga dengan menggunakan metode "*Projected Unit Credit*".

The actuarial calculations of pension benefits for year ended 31 December 2025 and 2024 are prepared by a registered independent actuarial consulting firm, PT Towers Watson Purbajaga using the "Projected Unit Credit" method.

Rekonsiliasi status pembiayaan atas program pensiun berdasarkan laporan aktuaria tanggal 27 Januari 2026 dan 7 Januari 2025 disajikan sebagai berikut:

A reconciliation of the funding status of the pension plan based on the actuarial reports dated 27 January 2026 and dated 7 January 2025 are as follows:

	2025	2024	
Nilai wajar aset dana pensiun	7,765,526	7,564,079	*Fair value of pension plan assets*
Nilai kini liabilitas manfaat pasti yang didanai	(9,593,741)	(8,660,892)	*Present value of funded defined benefit obligation*
Selisih kurang pendanaan	**(1,828,215)**	**(1,096,813)**	*Funding deficit*

Mutasi nilai kini liabilitas manfaat pasti yang didanai selama tahun berjalan adalah sebagai berikut:

The movements in the present value of funded defined benefit obligations for the year are as follows:

	2025	2024	
Pada awal periode	8,660,892	8,875,379	*At beginning of the period*
Biaya jasa kini	139,471	153,017	*Current service cost*
Biaya jasa lalu	44,857	-	*Past service cost*
Biaya bunga	595,139	586,253	*Interest cost*
	9,440,359	9,614,649	
Pengukuran kembali:			*Remeasurements:*
Kerugian/(keuntungan) aktuarial yang timbul dari perubahan asumsi keuangan	775,418	(253,928)	*Actuarial loss/(gain) from changes in financial assumption*
Kerugian/(keuntungan) aktuarial yang timbul karena penyesuaian atas pengalaman	39,288	(173,029)	*Actuarial loss/(gain) from changes in experience*
	814,706	(426,957)	
Pembayaran dari program:			*Payments from plan:*
Iuran peserta	23,385	24,677	*Employees' contributions*
Imbalan yang dibayar	(684,709)	(551,477)	*Benefits paid*
	(661,324)	(526,800)	
	9,593,741	**8,660,892**	

42. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Rekonsiliasi atas perubahan aset bersih selama tahun yang berakhir 31 Desember 2025 dan 2024 yang diakui di laporan posisi keuangan dana pensiun adalah sebagai berikut:

***42. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

The reconciliation of the movements of the net assets during the year ended 31 December 2025 and 2024 recognised in the pension fund's statement of financial position is as follows:

	2025	2024	
Kewajiban bersih pada awal periode	1,096,813	1,852,727	*Net liabilities at beginning of period*
Beban tahun berjalan	295,563	309,291	*Current year expenses*
Kontribusi pemberi kerja	(130,918)	(597,878)	*Employer's contributions*
Jumlah yang diakui pada penghasilan komprehensif lain	566,757	(467,327)	*Total amount recognised in other comprehensive income*
	1,828,215	**1,096,813**	

Mutasi nilai wajar aset program untuk tahun yang berakhir adalah sebagai berikut:

The movements in the fair value of plan assets for the year ended are as follows:

	2025	2024	
Pada awal periode	7,564,079	7,022,652	*At beginning of the period*
Hasil dari aset program	512,201	459,304	*Return on plan assets*
Keruntungan aktuarial	247,950	40,370	*Actuarial gain*
Kontribusi pemberi kerja	130,918	597,878	*Employer's contributions*
Kontribusi pekerja	23,385	24,677	*Employees' contributions*
Imbalan yang dibayar dan beban administrasi	(713,006)	(580,802)	*Benefits paid and administrative expenses paid*
	7,765,527	**7,564,079**	

Biaya imbalan pensiun yang dibebankan pada laporan laba rugi adalah sebagai berikut:

Pension expenses recognised in profit or loss, are as follows:

	2025	2024	
Biaya jasa kini	167,769	182,342	*Current service cost*
Biaya jasa lalu	44,857	-	*Past service cost*
Bunga bersih	82,937	126,949	*Net interest*
Biaya yang dibebankan pada laporan laba rugi	**295,563**	**309,291**	***Expense recognised in profit or loss***
Biaya yang dilaporkan pada laba rugi	295,563	309,291	*Expense recognised in profit or loss*
Pengukuran kembali yang diakui pada penghasilan komprehensif lain	566,757	(467,327)	*Remeasurement effect recognised in other comprehensive income*
Biaya imbalan pasti	**862,320**	**(158,036)**	***Defined benefit cost***

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah:

The key assumptions used in the above calculation are:

	2025	2024	
Asumsi ekonomi:			***Economic assumptions:***
Tingkat diskonto	6.25% - 7.00%	7.00% - 8.00%	*Discount rate*
Tingkat kenaikan gaji	7.00% - 9.00%	7.00% - 9.00%	*Rate of salary increases*
Pendapatan dari dana pensiun iuran pasti	5.50%	5.50%	*Interest credited to defined contribution fund*
Tingkat kenaikan manfaat pensiun	3.00%	3.00%	*Pension increase rate*
Manfaat lain	Rp5,000,000 per tahun untuk tahun 2025 – 2026/ f*or the year* 2025 – 2026 dan/*and* Rp 2,500,000 per tahun/*annualy*	2,500,000 per tahun/*annually*	*Other benefits*

42. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah: (lanjutan)

***42. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

The key assumptions used in the above calculation are: (continued)

	2025	2024	
Asumsi lainnya:			***Other assumptions:***
Usia pensiun normal	55/56 tahun/*years*	55/56 tahun/*years*	*Normal retirement age*
Tingkat kematian	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	*Mortality rate*
Tingkat cacat	10% dari tingkat kematian/*10% from mortality rate*	10% dari tingkat kematian/*10% from mortality rate*	*Disability rate*
Tingkat pengunduran diri			*Turnover rate*
Umur 20-29	4.2%	4.2%	*Age 20-29*
Umur 30-34	2.8%	2.8%	*Age 30-34*
Umur 35-39	3.0%	3.0%	*Age 35-39*
Umur 40-50	1.7%	1.7%	*Age 40-50*
Umur 51-52	1.3%	1.3%	*Age 51-52*
Umur >52	0.4%	0.4%	*Age >52*

Sensitivitas dari kewajiban manfaat pasti terhadap perubahan asumsi aktuaria adalah sebagai berikut:

The sensitivity of defined benefit obligation to changes in the weighted assumptions is as follows:

	Dampak terhadap kewajiban manfaat pasti/ *Impact on defined benefit obligation*		
31 Desember 2025	Perubahan asumsi/ *Change in assumption*	Nilai kini kewajiban manfaat pasti/ *Present value of benefit obligation*	***31 December 2025***
Tingkat diskonto	Kenaikan/*increase* 1%	(920,366)	*Discount rate*
	Penurunan/*decrease* 1%	1,107,185	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	157,634	*Salary increase rate*
	Penurunan/*decrease* 1%	(149,045)	

	Dampak terhadap kewajiban manfaat pasti/ *Impact on defined benefit obligation*		
31 Desember 2024	Perubahan asumsi/ *Change in assumption*	Nilai kini kewajiban manfaat pasti/ *Present value of benefit obligation*	***31 December 2024***
Tingkat diskonto	Kenaikan/*increase* 1%	(801,632)	*Discount rate*
	Penurunan/*decrease* 1%	959,403	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	153,102	*Salary increase rate*
	Penurunan/*decrease* 1%	(144,239)	

42. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Analisis sensitivitas didasarkan pada perubahan atas satu asumsi aktuarial dimana asumsi lainnya dianggap konstan. Dalam perhitungan sensitivitas kewajiban imbalan pasti atas asumsi aktuarial utama, metode yang sama (perhitungan nilai kini kewajiban imbalan pasti dengan menggunakan metode *projected unit credit* di akhir periode) telah diterapkan seperti dalam penghitungan kewajiban pensiun yang diakui dalam laporan posisi keuangan konsolidasian.

Pada tanggal 31 Desember 2025 dan 2024, aset program terdiri dari:

***42. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

The sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. When calculating the sensitivity of the defined benefit obligation to significant actuarial assumptions the same method (present value of the defined benefit obligation calculated with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the consolidated statement of financial position.

As of 31 December 2025 and 2024, plan assets comprise the following:

	2025	2024	
Obligasi Pemerintah	2,907,319	2,863,250	*Government Bonds*
Penempatan langsung	2,165,545	1,907,794	*Direct participation*
Obligasi	1,207,812	1,318,947	*Bonds*
Saham	920,811	932,663	*Shares*
Properti	306,598	321,461	*Property*
Deposito	114,063	137,393	*Time deposits*
Deposito *on call*	73,325	31,923	*On call deposits*
Reksa Dana	51,845	50,648	*Mutual funds*
Surat berharga Bank Indonesia	18,209	-	*Certificate Bank Indonesia*
	7,765,527	**7,564,079**	

Investasi telah terdiversifikasi dengan baik, sehingga kinerja buruk satu investasi tidak akan memberikan dampak material bagi seluruh kelompok aset. Proporsi terbesar aset investasi ditempatkan pada instrumen utang. Diyakini bahwa instrumen utang memberikan imbal hasil yang paling baik dalam jangka panjang pada tingkatan risiko yang dapat diterima. Untuk program manfaat pasti sebagian besar instrumen surat utang merupakan portofolio obligasi Pemerintah Republik Indonesia dan obligasi korporasi di Indonesia.

Investments are well-diversified, such that the failure of any single investment would not have a material impact to the overall group of assets. The largest proportion of assets are invested in debt instruments. Debt instruments are expected to contribute best yields in the long term at an acceptable risk level. For defined benefit program, most of the debt instruments are Government of Indonesia bonds and corporate bonds.

Hasil yang diharapkan dari aset program ditentukan dengan mempertimbangkan imbal hasil yang diharapkan atas aset yang mengacu pada kebijakan investasi. Hasil investasi bunga tetap didasarkan pada hasil pengembalian bruto pada tanggal pelaporan. Hasil yang diharapkan dari investasi ekuitas dan properti mencerminkan tingkat imbal hasil jangka panjang aktual yang terjadi untuk tiap-tiap pasar.

The expected return on plan assets is determined by considering the expected returns available on the assets in accordance with the current investment policy. Expected yields on fixed interest investments are based on gross redemption yields as of the reporting date. Expected returns on equity and property investments reflect long-term real rates of return experienced in the respective markets.

Bank terekspos beberapa risiko atas program imbalan kerja seperti risiko yang terekspos pada program manfaat pasti adalah adanya tingkat hasil investasi dibawah asumsi *discount rate* dan kenaikan gaji aktual yang lebih besar dari asumsi. Hal tersebut menimbulkan peningkatan iuran yang dibayarkan kepada Dana Pensiun.

The Bank is exposed to a number of risks through its employee benefit plans such as the exposed risks in defined benefit pension plan is the lower return on investment compared to assumption on discount rate and the increase in the actual salary is higher than its assumption. These will cause an increase in benefit paid to Pension Fund.

42. IMBALAN KERJA (lanjutan)

Program pensiun manfaat pasti (lanjutan)

Untuk memastikan bahwa posisi investasi yang telah diatur dalam kerangka *Asset Liability Management* (ALMA), Bank melakukan pemantauan terhadap investasi atas program pensiun (baik iuran pasti maupun manfaat pasti) dan memastikan tingkat investasi dimaksud mencapai tingkat diskonto yang digunakan. Selain itu, dilakukan implementasi kebijakan penyesuaian gaji sesuai dengan asumsi yang telah digunakan dalam perhitungan aktuaria untuk mengurangi selisih hasil perhitungan atas proyeksi imbalan kerja pasca kerja dengan realisasinya.

Rata-rata durasi kewajiban manfaat pasti pada tanggal 31 Desember 2025 adalah 10,76 tahun (31 Desember 2024: 10,42 tahun).

Analisis jatuh tempo yang diharapkan dari manfaat pensiun yang tidak terdiskonto untuk Entitas Induk adalah sebagai berikut:

***42. EMPLOYEE BENEFITS** (continued)*

***Defined benefit pension plan** (continued)*

To ensure that the result of investments is consistent with the Asset Liability Management (ALMA) framework, the Bank performs monitoring over the investment for the pension program (for both defined benefit and contribution plans) and performs action to ensure the return of investments will meet the applicable discount rate. Apart from that, implementation of salary adjustment policy has been performed in accordance to the assumptions used by actuarial calculation to reduce the gap on the calculation of projected post-employment benefits with its realisation.

The average duration of the defined benefit obligation as of 31 December 2025 is 10.76 years (31 December 2024: 10.42 years).

Expected maturity analysis of undiscounted pension benefit for Parent Only is as follows:

	Kurang dari 1 tahun/ *Less than a year*	2 sampai 5 tahun/ *Between 2 to 5 years*	Lebih dari 5 tahun/ *Over 5 years*	Jumlah/ *Total*	
31 Desember 2025					***31 December 2025***
Pensiun	657,571	2,993,254	26,205,369	29,856,194	*Pension*
Cuti besar	157,412	633,281	2,361,492	3,152,185	*Long leave*
Penghargaan masa kerja	54,416	310,665	2,057,754	2,422,835	*Gratuity*
Total	**869,399**	**3,937,200**	**30,624,615**	**35,431,214**	***Total***

	Kurang dari 1 tahun/ *Less than a year*	2 sampai 5 tahun/ *Between 2 to 5 years*	Lebih dari 5 tahun/ *Over 5 years*	Jumlah/ *Total*	
31 Desember 2024					***31 December 2024***
Pensiun	608,201	2,910,741	27,847,409	31,366,351	*Pension*
Cuti besar	152,254	619,185	2,166,152	2,937,591	*Long leave*
Penghargaan masa kerja	86,275	311,127	1,867,703	2,265,105	*Gratuity*
Total	**846,730**	**3,841,053**	**31,881,264**	**36,569,047**	***Total***

Program pensiun iuran pasti

Bank juga memiliki program pensiun iuran pasti, untuk karyawannya yang dikelola oleh Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk, dimana kontribusi iuran bank adalah sebesar 1,5% sampai dengan 6,5% dari gaji karyawan sesuai jabatan karyawan, sedangkan kontribusi iuran karyawan adalah sebesar 0,5% dari upah yang ditetapkan oleh Bank untuk karyawan tetap yang dipekerjakan sebelum tanggal 1 September 2005. Untuk karyawan tetap yang dipekerjakan mulai tanggal 1 September 2005, kontribusi Bank dan karyawan adalah masing-masing sebesar iuran 11,5% dan 3,5% dari gaji karyawan.

Karyawan tetap yang bergabung dengan Bank sebelum bulan September 2005, memiliki hak atas program pensiun manfaat pasti ditambah dengan program pensiun iuran pasti, atau imbalan kerja yang disediakan sesuai dengan Undang-Undang Cipta Kerja No. 6/2023 dan peraturan penerapan terkaitnya PP No. 35 Tahun 2021, mana yang lebih tinggi.

Defined contribution pension plan

The Bank also has a defined contribution pension plan for its employees which is managed by Dana Pensiun Lembaga Keuangan PT Bank Negara Indonesia (Persero) Tbk, whereby the contribution of the Bank is 1.5% to 6.5% of the employees' salaries according to the position of each employee, while the contribution of employees is 0.5% of the employees' salaries, determined by the Bank for employees hired before 1 September 2005. For employees hired after 1 September 2005, the Bank and its employees contribute 11.5% and 3.5%, respectively, of the employees' salaries.

Permanent employees who joined the Bank prior to September 2005 are entitled to defined benefits pension plan plus defined contribution pension plan, or the benefits provided for under the Undang-Undang Cipta Kerja No. 6/2023 and its implementing regulation PP No. 35 Tahun 2021, whichever is higher.

42. IMBALAN KERJA (lanjutan)

Program pensiun iuran pasti (lanjutan)

Beban pensiun iuran pasti yang telah dibebankan pada laporan laba rugi adalah sebesar Rp248.186 dan Rp271.374 masing-masing untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024.

Liabilitas atas imbalan pasca kerja meliputi uang jasa, uang pisah dan pesangon sesuai dengan Undang-Undang Cipta Kerja No. 6/2023, PP 35/2021 dan kompensasi lainnya.

Imbalan kerja jangka panjang lainnya

Imbalan jangka panjang lainnya seperti cuti berimbalan jangka panjang, imbalan cacat permanen dan penghargaan *jubilee* dihitung dengan menggunakan metode *projected unit credit* dan didiskontokan ke nilai kini.

Penilaian aktuarial atas imbalan kerja jangka panjang lainnya untuk tahun yang berakhir tanggal 31 Desember 2025 dan 2024 dilakukan oleh perusahaan konsultan aktuaria terdaftar independen, PT Towers Watson Purbajaga dengan menggunakan metode "*Projected Unit Credit*" sebagaimana yang tercantum dalam laporan masing-masing pada tanggal 27 Januari 2026 dan 7 Januari 2025.

Perubahan liabilitas imbalan kerja yang diakui Bank pada laporan posisi keuangan konsolidasian adalah sebagai berikut:

***42. EMPLOYEE BENEFITS** (continued)*

***Defined contribution pension plan** (continued)*

Defined contribution pension expense that was charged to profit or loss amounted to Rp248,186 and Rp271,374 for the year ended 31 December 2025 and 2024, respectively.

The liability for post employment benefits consisted of service payments, severance and termination benefits based on Undang-Undang Cipta Kerja No. 6/2023, PP 35/2021 and other compensations.

Other long-term employee benefits

Other long-term employee benefits such as long service leave, permanent disability benefit and jubilee awards are calculated using the projected unit credit method and discounted to present value.

The actuarial valuation of other long-term employee benefits for the year ended 31 December 2025 and 2024 were prepared by a registered independent actuarial consulting firm, PT Towers Watson Purbajaga using the "Projected Unit Credit" method as stated in its reports dated 27 January 2026 and 7 January 2025, respectively.

The movements of the employee benefits liability recognised by the Bank in the consolidated statement of financial position are as follows:

	2025	2024	
Liabilitas bersih pada awal periode	2,819,762	2,628,569	*Net liability at the beginning of the period*
Biaya selama tahun berjalan	792,183	467,541	*Expense recognised during the current year*
Penyesuaian atas Perubahan Metode Atribusi - laba rugi	-	(4,510)	*Adjustments for Changes in Attribution Methods - profit and loss*
Jumlah yang diakui pada penghasilan komprehensif lain	24,446	(56,020)	*Total amount recognised in other comprehensive income*
Pembayaran imbalan	(548,477)	(215,818)	*Actual benefit payments*
	3,087,914	**2,819,762**	

Biaya imbalan kerja yang dibebankan Bank pada laporan laba rugi:

Employee benefits expense recognised by the Bank in profit or loss:

	2025	2024	
Biaya jasa kini	302,040	299,719	*Current service cost*
Biaya bunga	181,652	171,094	*Interest cost*
Kerugian/(keuntungan) aktuaria periode berjalan - bersih	308,491	(5,062)	*Actuarial loss/(gain) recognised in current period - net*
Penyesuaian atas Perubahan Metode atribusi	-	(2,720)	*Adjustments for Changes in Attribution Methods*
Biaya yang dibebankan pada laba rugi	**792,183**	**463,031**	***Expense recognised in profit or loss***

42. IMBALAN KERJA (lanjutan)

Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya (lanjutan)

Biaya imbalan kerja yang dibebankan Bank pada laporan laba rugi: (lanjutan)

***42. EMPLOYEE BENEFITS** (continued)*

***Post employment benefits and other long-term employee benefits** (continued)*

Employee benefits expense recognised by the Bank in profit or loss: (continued)

	2025	2024	
Biaya imbalan pasti yang diakui pada laba rugi	792,183	463,031	*Defined benefit cost recognised in profit or loss*
Pengukuran kembali yang diakui pada penghasilan komprehensif lainnya	24,446	(56,020)	*Remeasurement effect recognised in other comprehensive income*
Biaya imbalan pasti	**816,629**	**407,011**	***Defined benefit cost***

Asumsi-asumsi utama yang digunakan dalam perhitungan di atas adalah:

The key assumptions used in the above calculation are:

	2025	2024	
Asumsi ekonomi:			***Economic assumptions:***
Tingkat diskonto per tahun	7.00%	7.00%	*Annual discount rate*
Tingkat kenaikan gaji	7.00 - 9.00%	7.00 - 9.00%	*Rate of salary increases*
Pendapatan dari dana pensiun iuran pasti	5.50%	5.50%	*Interest credited to defined contribution fund*
Asumsi lainnya:			***Other assumptions:***
Usia pensiun normal	55-56 tahun/*years*	55-56 tahun/*years*	*Normal retirement age*
Tingkat kematian	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	Modifikasi Tabel Mortalita Indonesia 2019 (TMI2019)/ *Adjusted Mortality Table Indonesia 2019 (TMI2019)*	*Mortality rate*
Tingkat cacat	10% dari tingkat kematian/*10% from mortality rate*	10% dari tingkat kematian/*10% from mortality rate*	*Disability rate*
Tingkat pengunduran diri			*Turnover rate*
Umur 20-29	4.2%	4.2%	*Age 20-29*
Umur 30-34	2.8%	2.8%	*Age 30-34*
Umur 35-39	3.0%	3.0%	*Age 35-39*
Umur 40-50	1.7%	1.7%	*Age 40-50*
Umur 51-52	1.3%	1.3%	*Age 51-52*
Umur >52	0.4%	0.4%	*Age >52*

Sensitivitas dari kewajiban imbalan pasca kerja lainnya terhadap perubahan asumsi aktuaria adalah sebagai berikut:

The sensitivity of other post benefit obligation to changes in the actuarial assumptions is as follows:

		Dampak imbalan kerja jangka panjang lainnya/ *Impact on other long-term employee benefits*		
2025	**Perubahan Asumsi/ *Change in Assumption***	**Nilai kini kewajiban imbalan kerja/ *Present value of benefit obligation***	**Biaya jasa kini/ *Current service cost***	***2025***
Tingkat diskonto	Kenaikan/*increase* 1%	(174,252)	(4,807)	*Discount rate*
	Penurunan/*decrease* 1%	196,397	5,461	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	288,823	9,714	*Salary increase rate*
	Penurunan/*decrease* 1%	(239,457)	(7,686)	

42. IMBALAN KERJA (lanjutan)

Imbalan pasca kerja lainnya dan imbalan kerja jangka panjang lainnya (lanjutan)

42. EMPLOYEE BENEFITS *(continued)*

Post employment benefits and other long-term employee benefits *(continued)*

2024	Perubahan Asumsi/ *Change in Assumption*	Dampak imbalan kerja jangka panjang lainnya/ *Impact on other long-term employee benefits* — Nilai kini kewajiban imbalan kerja/ *Present value of benefit obligation*	Biaya jasa kini/ *Current service cost*	*2024*
Tingkat diskonto	Kenaikan/*increase* 1%	(151,165)	(4,838)	*Discount rate*
	Penurunan/*decrease* 1%	169,753	5,465	
Tingkat kenaikan gaji	Kenaikan/*increase* 1%	241,009	8,751	*Salary increase rate*
	Penurunan/*decrease* 1%	(200,400)	(6,986)	

Analisis sensitivitas didasarkan pada perubahan atas satu asumsi aktuarial dimana asumsi lainnya dianggap konstan. Dalam perhitungan sensitivitas kewajiban imbalan pasti atas asumsi aktuarial utama, metode yang sama (perhitungan nilai kini kewajiban imbalan pasti dengan menggunakan metode *projected unit credit* di akhir periode pelaporan) telah diterapkan seperti dalam penghitungan kewajiban pensiun yang diakui dalam laporan posisi keuangan konsolidasian.

The sensitivity analysis is based on a change in an actuarial assumption while holding all other assumptions constant. When calculating the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value of the defined benefit obligation calculated with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the consolidated statement of financial position.

43. LABA PER SAHAM DASAR/DILUSIAN DIATRIBUSIKAN KEPADA PEMILIK ENTITAS INDUK

Laba tahun berjalan per saham dasar dihitung dengan membagi laba tahun berjalan diatribusikan kepada pemilik entitas induk dengan rata-rata tertimbang jumlah lembar saham biasa yang beredar pada tahun bersangkutan.

43. BASIC/DILUTED EARNINGS PER SHARE ATTRIBUTABLE TO EQUITY HOLDERS OF THE PARENT ENTITY

Basic earnings per share is computed by dividing income for the year attributable to owners of the parent entity by the weighted average number of outstanding common shares during the related year.

	2025	2024	
Laba tahun berjalan yang dapat diatribusikan kepada pemilik entitas induk	20,040,703	21,463,599	*Income for the year attributable to owners of the parent entity*
Rata-rata tertimbang jumlah lembar saham biasa yang beredar (dalam nilai penuh)	37,297,312,916	37,289,742,787	*Weighted average number of outstanding ordinary shares (in full amount)*
Laba per saham dasar diatribusikan kepada pemilik entitas induk (dalam Rupiah penuh)	537	576	*Basic earnings per share attributable to equity holders of the parent entity (in full Rupiah amount)*

Bank dan Entitas Anak tidak memiliki potensi saham yang bersifat dilutif.

The Bank and Subsidiaries have no dilutive potential shares.

44. PEMBAYARAN BERBASIS SAHAM

Berdasarkan Keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 29 Maret 2021 yang diaktakan dengan akta No. 14, yang dibuat di hadapan Notaris Fathiah Helmi, S.H., dengan tanggal yang sama, RUPS telah menyetujui untuk mengalihkan secara keseluruhan saham hasil pembelian kembali *(buyback)* tahun 2020 yang disimpan sebagai saham treasuri sebanyak 19.579.700 saham dalam rangka Program Kepemilikan Saham oleh Pegawai dan Program Kepemilikan Saham oleh Direksi dan Dewan Komisaris.

Selanjutnya, berdasarkan Surat Kementerian Badan Usaha Milik Negara (KBUMN) No. SR-33/Wk2.MBU.A/10/2021 tanggal 1 Oktober 2021, Menteri Negara BUMN telah menetapkan besarnya Jumlah Tantiem untuk Direksi dan Dewan Komisaris atas kinerja Tahun Buku 2020. Menindaklanjuti hal tersebut, dengan memperhatikan ketentuan POJK No.45/POJK.03/2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum dan berdasarkan keputusan manajemen bahwa 20% dari jumlah Tantiem dibayarkan sebagai remunerasi yang harus ditangguhkan dan dibayarkan dalam bentuk saham untuk Direksi dan Dewan Komisaris non independen, serta dalam bentuk deposito bagi Komisaris Independen.

Bank telah memberikan saham sebagaimana disebutkan di atas pada tanggal 30 Desember 2021 sebanyak 5.724.673 lembar saham dengan pembukaan periode *lock-up* beserta pembagiannya sebagai berikut:

1. Periode *lock-up* tahap I pada tanggal 5 Juni 2022 dengan jumlah saham sebesar 1.642.746 lembar saham;
2. Periode l*ock-up* tahap II pada tanggal 5 Juni 2023 dengan jumlah saham sebesar 1.642.738 lembar saham;
3. Periode *lock-up* tahap III pada tanggal 5 Juni 2024 dengan jumlah saham sebesar 1.642.726 lembar saham; dan
4. Periode *lock-up* tahap IV pada tanggal 5 Juni 2025 dengan jumlah saham sebesar 796.463 lembar saham.

Saham diberikan kepada Direksi dan Dewan Komisaris tertentu berdasarkan pencapaian performa kinerja Bank. Harga eksekusi yang diberikan sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp6.750 (nilai penuh).

44. SHARE-BASED PAYMENT

Based on the decision of the BNI's Shareholders Annual General Meeting held on 29 March 2021, notarized by deed No. 14, made before Notary Fathiah Helmi, S.H., on the same date, the shareholders approved the granting of authority and approved the transfer all of the shares from the 2020 buyback that has been registered as treasury shares of 19,579,700 for the purpose of the Employee Shares Ownership Program and the Board of Directors and the Board of Commissioners share ownership program.

Furthermore, according to the Letter of the Ministry of State-Owned Enterprises (KBUMN) No. SR-33/Wk2.MBU.A/10/2021 dated 1 October 2021, the Minister of State-Owned Enterprises has determined the amount of Tantiem for the Board of Directors and Board of Commissioners for the performance of Fiscal Year 2020. Following up on this, taking into account FSA Regulation No.45/POJK 03/2015 concerning the Implementation of Good Corporate Governance in Providing Remuneration for Commercial Banks and based on management's decision that 20% of the amount of Tantiem is paid as remuneration which must be deferred and paid in the form of shares for Board of Directors and non-independent Board of Commissioners, as well as in the form of deposits for Independent Commissioners.

The Bank has granted 5,724,673 shares as mentioned above on 30 December 2021 with the opening of the lock-up period and the distribution is as follows:

1. *First phase of the lock-up period on 5 June 2022 with a total of 1,642,746 shares;*
2. *Lock-up period phase II on 5 June 2023 with a total of 1,642,738 shares;*
3. *Lock-up period phase III on 5 June 2024 with a total of 1,642,726 shares and;*
4. *Lock-up period phase IV on 5 June 2025 with a total of 796,463 shares.*

Shares are granted to the Board of Directors and the Board of Commissioners based on Bank's performance target achievement. The exercise price of the granted options is equal to the market price at the grant date amounting to Rp6,750 (full amount).

44. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Selain itu, berdasarkan Keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2022 yang diaktakan dengan akta No. 22, yang dibuat di hadapan Notaris Fathiah Helmi, S.H., dengan tanggal yang sama, RUPS telah menyetujui untuk mengalihkan secara keseluruhan saham hasil pembelian kembali *(buyback)* tahun 2021 yang disimpan sebagai saham treasuri sebanyak 24.682.600 saham dalam rangka Program Kepemilikan Saham oleh Pegawai dan Program Kepemilikan Saham oleh Direksi dan Dewan Komisaris.

Selanjutnya, berdasarkan Surat Kementerian Badan Usaha Milik Negara (KBUMN) No. SR-23/Wk2.MBU.A/07/2022 tanggal 25 Juli 2022, Menteri Negara BUMN telah menetapkan besarnya Jumlah Tantiem untuk Direksi dan Dewan Komisaris atas kinerja Tahun Buku 2021. Menindaklanjuti hal tersebut, dengan memperhatikan ketentuan POJK No.45/POJK.03/2015 tentang Penerapan Tata Kelola Dalam Pemberian Remunerasi Bagi Bank Umum dan berdasarkan keputusan manajemen bahwa 10% dari jumlah Tantiem dibayarkan sebagai remunerasi yang harus ditangguhkan dan dibayarkan dalam bentuk saham untuk Direksi dan Dewan Komisaris non independen, serta dalam bentuk deposito bagi Komisaris Independen.

Bank telah memberikan saham sebagaimana disebutkan di atas pada tanggal 29 Juli 2022 sebanyak 3.001.097 lembar saham dengan pembukaan periode *lock-up* beserta pembagiannya sebagai berikut:

1. Periode *lock-up* tahap I pada tanggal 5 Juni 2023 dengan jumlah saham sebesar 922.460 lembar saham;
2. Periode *lock-up* tahap II pada tanggal 5 Juni 2024 dengan jumlah saham sebesar 1.039.325 lembar saham; dan
3. Periode *lock-up* tahap III pada tanggal 5 Juni 2025 dengan jumlah saham sebesar 1.039.312 lembar saham.

Saham diberikan kepada Direksi, Dewan Komisaris dan karyawan tertentu tersebut berdasarkan pada pencapaian performa kinerja Bank. Harga eksekusi yang diberikan sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp7.850 (nilai penuh).

***44. SHARE-BASED PAYMENT** (continued)*

Other than that, based on the decision of the BNI's Shareholders Annual General Meeting held on 15 March 2022, notarized by deed No. 22, made before Notary Fathiah Helmi, S.H., on the same date, the shareholders approved the granting of authority and approved to transfer all of the shares from the 2021 buyback that has been registered as treasury shares of 24,682,600 for the purpose of the Employee Shares Ownership Program and the Board of Directors and the Board of Commissioners share ownership program.

Furthermore, according to the Letter of the Ministry of State-Owned Enterprises (KBUMN) No. SR-*23/Wk2.MBU.A/07/2022 dated 25 July 2022, the Minister of State-Owned Enterprises has determined the amount of Tantiem for the Board of Directors and Board of Commissioners for the performance of Fiscal Year 2021. Following up on this, taking into account to POJK No.45/POJK 03/2015 concerning the Implementation of Good Corporate Governance in Providing Remuneration for Commercial Banks and based on management's decision that 10% of the amount of Tantiem is paid as remuneration which must be deferred and paid in the form of shares for Board of Directors and non-independent Board of Commissioners, as well as in the form of deposits for Independent Commissioners.*

The Bank has granted 3,001,097 shares as mentioned above on 29 July 2022 with the opening of the lock-up period and the distribution is as follows:

1. *First phase of the lock-up period on 5 June 2023 with a total of 922,460 shares;*
2. *Lock-up period phase II on 5 June 2024 with a total of 1,039,325 shares; and*
3. *Lock-up period phase III on 5 June 2025 with a total of 1,039,312 shares.*

Shares are granted to Board of Directors, Board of Commissioners and several employees based on Bank's performance target achievement. The exercise price of the granted options is equal to the market price at the grant date amounting to Rp7,850 (full amount).

44. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Berdasarkan keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2023 yang diaktakan dengan Akta No. 15 yang dibuat di hadapan Notaris Ashoya Ratam, SH, M.Kn., dengan tanggal yang sama, RUPS telah menyetujui untuk (1) Memberikan wewenang dan kuasa kepada Pemegang Saham Seri A Dwiwarna untuk menetapkan besarnya Tantiem untuk Tahun Buku 2022, serta menetapkan gaji/honorarium, tunjangan, fasilitas dan insentif lainnya termasuk namun tidak terbatas pada *Long Term Incentive*, bagi anggota Dewan Komisaris untuk Tahun 2023. (2) Memberikan wewenang dan kuasa kepada Dewan Komisaris dengan terlebih dahulu mendapatkan persetujuan tertulis dari Pemegang Saham Seri A Dwiwarna untuk menetapkan besarnya Tantiem untuk Tahun Buku 2022, serta menetapkan gaji/honorarium, tunjangan, fasilitas dan insentif lainnya termasuk namun tidak terbatas pada *Long Term Incentive*, bagi anggota Direksi untuk Tahun 2023.

Selanjutnya, berdasarkan Surat Kementerian Badan Usaha Milik Negara (KBUMN) No. SR-25/Wk2.MBU.A/07/2023 tanggal 4 Juli 2023 kemudian ditindaklanjuti dengan Surat Dewan Komisaris No. DK/84 tanggal 5 Juli 2023, pada tanggal 15 Februari 2024, Bank telah melakukan pembayaran remunerasi berbasis saham dalam bentuk *Long Term Incentive* sebanyak 15.637.000 lembar saham dengan pembukaan periode *lock-up* pada tahun 2026 dengan memperhatikan ketentuan *holding period* sesuai ketentuan *Long Term Incentive* BUMN pada Peraturan Menteri BUMN No. PER-3/MBU/03/2023 tentang Organ dan Sumber Daya Manusia Badan Usaha Milik Negara.

Saham dialokasikan kepada Direksi dan Dewan Komisaris yang menjabat sepanjang tahun 2023 dan akan dimiliki sepenuhnya (eksekusi) setelah tanggal *lock-up* dan *holding period* berdasarkan pada pencapaian performa kinerja Bank pada tahun 2023-2025 sebagaimana yang telah diperjanjikan antara anggota Direksi dan Dewan Komisaris dengan Kementerian BUMN. Harga eksekusi adalah harga *fair value* tahun 2026 yang telah dihitung oleh konsultan independen yaitu sebesar Rp4.704 (tidak diaudit).

***44. SHARE-BASED PAYMENT** (continued)*

Based on the decision of the BNI Annual General Meeting of Shareholders (GMS) dated 15 March 2023 which was notarized by Deed No. 15 made before Notary Ashoya Ratam, SH, M.Kn., on the same date, the GMS has agreed to (1) Grant authority and power to Series A Dwiwarna Shareholders to determine the amount of bonuses for the 2022 Financial Year, as well as determining salaries/honorariums, allowances, facilities and other incentives including but not limited to Long Term Incentives, for members of the Board of Commissioners for 2023. (2) Grant authority and power to the Board of Commissioners by first obtaining written approval from the Series A Dwiwarna Shareholders to determine the amount of Tantiem for the 2022 Financial Year, as well as determine the salary/honorarium, allowances, facilities and other incentives including but not limited to Long Term Incentives, for members of the Board of Directors for 2023.

Furthermore, based on the Letter of the Ministry of State-Owned Enterprises (KBUMN) No. SR-25/Wk2.MBU.A/07/2023 dated 4 July 2023 was then followed up with Board of Commissioners Letter No. DK/84 dated 5 July 2023, on 15 February 2024 the Bank has paid share-based remuneration in the form of Long Term Incentive of 15,637,000 shares with the opening of the lock-up period in 2026 taking into account the holding period provisions in accordance with the Long Term Incentive provisions BUMN in BUMN Ministerial Regulation No. PER-3/MBU/03/2023 concerning Organs and Human Resources of State-Owned Enterprises.

Shares are allocated to the Board of Directors and Board of Commissioners who serve throughout 2023 and will be fully owned (executed) after the lock-up date and holding period based on the Bank's performance achievements in 2023-2025 as agreed between members of the Board of Directors and Board of Commissioners and the Ministry of BUMN. The execution price is the fair value price in 2026 which has been calculated by an independent consultant, amounting to Rp4,704 (unaudited).

44. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Program *Employee Stock Allocation* ("ESA")

Berdasarkan Keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2022 yang diaktakan dengan akta No. 22, yang dibuat di hadapan Notaris Fathiah Helmi, S.H., dengan tanggal yang sama, RUPS telah menyetujui untuk mengalihkan secara keseluruhan saham hasil pembelian kembali (*buyback*) tahun 2021 yang disimpan sebagai saham treasuri sebanyak 24.682.600 saham dalam rangka Program Kepemilikan Saham oleh Pegawai dan Program Kepemilikan Saham oleh Direksi dan Dewan Komisaris. Menyetujui memberikan kuasa dan wewenang pelaksanaan Program Kepemilikan Saham bagi Pegawai dan/atau Program Kepemilikan Saham bagi Direksi dan Dewan Komisaris baik bersumber dari saham treasuri maupun sumber lainnya.

Bank telah memberikan saham sebagaimana disebutkan di atas pada tanggal 2 Juni 2022 sebanyak 67.795.400 lembar saham yang mempunyai pembukaan periode *lock-up* dengan tahapan sebagai berikut:

1. Pembukaan periode *lock-up* tahap I pada tanggal 2 Juni 2023 dengan jumlah saham sebesar 47.938.100 lembar saham,
2. Pembukaan periode *lock-up* tahap II pada tanggal 2 Juni 2024 dengan jumlah saham sebesar 10.854.800 lembar saham, dan
3. Pembukaan periode lock-up tahap III pada tanggal 2 Juni 2025 dengan jumlah saham sebesar 9.002.500 lembar saham.

Saham diberikan kepada direksi dan karyawan tertentu berdasarkan pada pencapaian performa kinerja Bank. Harga eksekusi yang diberikan sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp8.850 (nilai penuh).

Pada tanggal 29 Desember 2022, Bank memberikan saham sebanyak 10.355.756 lembar saham yang mempunyai pembukaan periode *lock-up* dengan tahapan sebagai berikut:

1. Pembukaan periode *lock-up* tahap I pada tanggal 2 Juni 2023 dengan jumlah saham sebesar 7.975.689 lembar saham,
2. Pembukaan periode *lock-up* tahap II pada tanggal 2 Juni 2024 dengan jumlah saham sebesar 622.400 lembar saham,
3. Pembukaan periode *lock-up* tahap III pada tanggal 2 Juni 2025 dengan jumlah saham sebesar 1.551.800 lembar saham,
4. Pembukaan periode lock-up tahap I, II dan III pada tanggal 29 Maret 2023, 2024, dan 2025 dengan jumlah saham sebesar 205.867 lembar saham.

***44. SHARE-BASED PAYMENT** (continued)*

Employee Stock Allocation ("ESA") Program

Based on the decision of the BNI's Shareholders Annual General Meeting held on 15 March 2022, notarized by deed No. 22, made before Notary Fathiah Helmi, S.H., on the same date, the shareholders approved the granting of authority and approved to transfer all of the shares from the 2021 buyback that has been registered as treasury shares of 24,682,600 for the purpose of the Employee Shares Ownership Program and the Board of Directors and the Board of Commissioners Shares Ownership program. Approved and grant power and authority to implement the Share Ownership Program for Employees and/or Share Ownership Program for the Board of Directors and the Board of Commissioners, whether sourced from treasury shares or other sources.

The Bank has granted shares as mentioned above on 2 June 2022 as many as 67,795,400 shares with the opening of the lock-up period and the distribution is as follows:

1. *First phase of the lock-up period on 2 June 2023 with a total of 47,938,100 shares;*
2. *Lock-up period phase II on 2 June 2024 with a total of 10,854,800 shares; and*
3. *Lock-up period phase III on 2 June 2025 with a total of 9,002,500 shares.*

Shares are granted to directors and to selected employees based on Bank's performance target achievement. The exercise price of the granted options is equal to the market price at the grant date amounting to Rp8,850 (full amount).

On 29 December 2022, The Bank has granted shares as many as 10,355,756 shares with the opening of the lock-up period and the distribution is as follows:

1. *First phase of the lock-up period on 2 June 2023 with a total of 7,975,689 shares;*
2. *Lock-up period phase II on 2 June 2024 with a total of 622,400 shares;*
3. *Lock-up period phase III on 2 June 2025 with a total of 1,551,800 shares.*
4. *Lock-up period phase I, II, and III on 29 March 2023, 2024, and 2025 with a total of 205,687 shares.*

44. PEMBAYARAN BERBASIS SAHAM (lanjutan)

Program *Performance Stock Bonus*

Berdasarkan keputusan Rapat Umum Pemegang Saham (RUPS) Tahunan BNI tanggal 15 Maret 2023 yang diaktakan dengan Akta No. 15 yang dibuat di hadapan Notaris Ashoya Ratam, SH, M.Kn., dengan tanggal yang sama, RUPS telah menyetujui untuk pembelian kembali saham Bank (*buyback*) dan pengalihan saham hasil *buyback* yang disimpan sebagai saham treasuri (*treasury stock*), dengan nilai *buyback* sebesar-sebesarnya Rp905.000.000.000,- (sembilan ratus lima miliar Rupiah), dalam rangka program Kepemilikan Saham bagi Pegawai dan/atau Program Kepemilikan Saham bagi Direksi dan Dewan Komisaris sebagai salah satu opsi pengalihan saham hasil pembelian kembali (*buyback*) yang disimpan sebagai saham treasuri (*treasury stock*). Menyetujui memberikan kuasa dan wewenang pelaksanaan Program Kepemilikan Saham bagi Pegawai dan/atau Program Kepemilikan Saham bagi Direksi dan Dewan Komisaris kepada Direksi Perseroan untuk melaksanakan Program Kepemilikan Saham bagi Pegawai; dengan tetap memperhatikan peraturan perundang-undangan yang berlaku.

Pada tanggal 16 April 2024, Bank memberikan saham sebanyak 24.877.600 lembar saham, yang akan dimiliki sepenuhnya (eksekusi) setelah tanggal *lock-up* dan *holding period* berdasarkan pada pencapaian performa kinerja Bank tahun 2024 yang telah ditetapkan; dan atau setelah 1 (satu) tahun tanggal alokasi dan *vesting*.

Harga saham *Performance Stock Bonus* sama dengan harga pasar pada tanggal pemberian yaitu sebesar Rp5.200 (nilai penuh).

Dengan memperhatikan pencapaian performa kinerja Bank tahun 2024 yang telah ditetapkan, pada tanggal 16 – 19 April 2025 telah dilakukan pembukaan *lock-up* saham *Performance Stock Bonus* sesuai dengan ketentuan yang berlaku.

44. SHARE-BASED PAYMENT (continued)

Performance Stock Bonus Program

Based on the decision of the BNI Annual General Meeting of Shareholders (GMS) dated 15 March 2023 which was notarized by Deed No. 15 made before Notary Ashoya Ratam, SH, M.Kn., on the same date, the GMS approved the buyback of the Bank's shares which have been issued and listed on the Indonesia Stock Exchange (IDX) for the full nominal amount buyback maximum Rp905,000,000,000 (nine hundred five billion Rupiah) for the purpose of the Employee Stock Ownership Program and/or the Management Ownership Program for Directors and Board of Commissioners as one of the options for utilizing the shares from buybacks which are held as treasury stock. Approved and grant power and authority to implement the Employee Stock Ownership Program and/or the Management Ownership Program to Company Directors to implement the Employee Stock Ownership Program; in compliance with applicable laws and regulations.

On 16 April 2024, the Bank issued 24,877,600 shares, which will be fully vested (executed) after the lock-up and holding period based on the Bank's performance achievements in 2024 that have been set; and/or after 1 (one) year from the allocation and vesting date.

The exercise price of the granted options is equal to the market price at the grant date amounting to Rp5,200 (full amount).

Based on the Bank's performance achievement in 2024, on 16 – 19 April 2025 the lock-up for the Performance Stock Bonus shares has been opened according to the applicable terms and conditions.

45. KOMITMEN DAN KONTINJENSI / *45. COMMITMENTS AND CONTINGENCIES*

	2025	2024	
Tagihan komitmen			***Commitment receivables***
Pembelian berjangka mata uang asing yang belum diselesaikan	248,307,611	211,119,603	*Unsettled purchased of foreign currency futures*
Lain-lain	156,123	87,401	*Others*
	248,463,734	**211,207,004**	

45. KOMITMEN DAN KONTINJENSI (lanjutan) / *45. COMMITMENTS AND CONTINGENCIES (continued)*

	2025	2024	
Liabilitas komitmen			***Commitment payables***
Penjualan berjangka mata uang asing yang belum diselesaikan	247,565,353	210,837,973	*Sales of foreign currency futures unresolved*
Fasilitas kredit kepada debitur yang belum digunakan	93,616,400	57,552,807	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	11,086,951	9,952,660	*Outstanding irrevocable letters of credit*
Lainnya	156,123	87,401	*Others*
	352,424,827	**278,430,841**	

	2025	2024	
Tagihan kontinjensi			***Contingent receivables***
Garansi bank yang diterima	46,210,399	27,161,836	*Bank guarantees received*
Pendapatan bunga dalam penyelesaian	11,063,008	11,789,678	*Interest receivable on non performing assets*
Lainnya	633,540	533,640	*Others*
	57,906,947	**39,485,154**	

Liabilitas kontinjensi			***Contingent payables***
Garansi yang diterbitkan dalam bentuk:			*Guarantees issued in the form of:*
Performance bonds	49,233,041	29,531,031	*Performance bonds*
Advance payment bonds	22,844,852	12,001,829	*Advance payment bonds*
Standby letters of credit	16,554,117	20,640,452	*Standby letters of credit*
Garansi bank lainnya	15,738,509	9,717,376	*Other bank guarantees*
Bid bonds	2,255,445	1,560,292	*Bid bonds*
Lainnya	4,449,289	3,119,342	*Others*
	111,075,253	**76,570,322**	

Transaksi komitmen dan kontinjensi yang terjadi dalam kegiatan normal Grup yang mempunyai risiko kredit adalah sebagai berikut:

Commitments and contingent transactions in the normal course of the Group's activities that have credit risk are as follows:

	2025	2024	
Garansi bank yang diterbitkan			*Bank guarantees issued*
Pihak berelasi (Catatan 46t)	24,326,583	22,790,386	*Related parties (Note 46t)*
Pihak ketiga	82,299,381	50,660,594	*Third parties*
Irrevocable letters of credit			*Irrevocable letters of credit*
Pihak berelasi (Catatan 46u)	6,808,835	3,908,349	*Related parties (Note 46u)*
Pihak ketiga	4,278,116	6,044,311	*Third parties*
Fasilitas kredit kepada debitur yang belum digunakan			*Unused loan facilities*
Pihak berelasi (Catatan 46v)	37,345,945	16,171,508	*Related parties (Note 46v)*
Pihak ketiga	56,270,455	41,381,299	*Third parties*
	211,329,315	**140,956,447**	

Informasi tambahan terkait kolektabilitas yang disajikan merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia diungkapkan pada Catatan 61k.

The following additional information presented in relation to collectibility required regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Accounting Standards are disclosed in Note 61k.

46. TRANSAKSI DENGAN PIHAK BERELASI

Dalam kegiatan normal usaha, Bank melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan. Semua transaksi dengan pihak-pihak berelasi telah dilakukan dengan kebijakan dan syarat yang telah disepakati bersama.

a. Jenis hubungan

Hubungan pihak berelasi sebagai pemegang saham utama

Pemerintah Republik Indonesia melalui Kementerian Keuangan

PT Danantara Asset Management (Persero)

Pengendalian melalui Pemerintah Republik Indonesia

Badan Penyelenggara Jaminan Sosial (BPJS) Kesehatan

Badan Penyelenggara Jaminan Sosial (BPJS) Ketenagakerjaan

Kementerian Keuangan Republik Indonesia

Lembaga Kantor Berita Nasional (LKBN) Antara

Perum BULOG dan Entitas Anak

Perum DAMRI

Perum Jasa Tirta I

Perum Jasa Tirta II

Perum Lembaga Penyelenggara Pelayanan Navigasi Penerbangan Indonesia

Perum Percetakan Negara Republik Indonesia

Perum Percetakan Uang Republik Indonesia ("Perum Peruri") dan Entitas Anak

Perum Perhutani dan Entitas Anak

Perum Pengangkutan Penumpang Djakarta

Perum Perumnas

Perum Produksi Film Negara

PT Adhi Karya (Persero) Tbk dan Entitas Anak

PT Amarta Karya (Persero)

PT ASDP Indonesia Ferry (Persero) dan Entitas Anak

PT Asuransi Jiwasraya (Persero)

PT Asuransi Sosial Angkatan Bersenjata Republik Indonesia (Persero)

PT Aviasi Pariwisata Indonesia (Persero) dan Entitas Anak

PT Bahana Pembinaan Usaha Indonesia (Persero) dan Entitas Anak

PT Bank Mandiri (Persero) Tbk dan Entitas Anak

46. RELATED PARTY TRANSACTIONS

In the normal course of business, the Bank enters into certain transactions with parties which are related to the management and/or owned by the same ultimate shareholder. All transactions with related parties have met the agreed terms and conditions.

a. Type of relationships

Related party relationship as the controlling shareholder

The Government of Republic of Indonesia through the Ministry of Finance

PT Danantara Asset Management (Persero)

Control through The Government of The Republic of Indonesia

Badan Penyelenggara Jaminan Sosial (BPJS) Kesehatan

Badan Penyelenggara Jaminan Sosial (BPJS) Ketenagakerjaan

Ministry of Finance of the Republic of Indonesia

Lembaga Kantor Berita Nasional (LKBN) Antara

Perum BULOG and Subsidiaries

Perum DAMRI

Perum Jasa Tirta I

Perum Jasa Tirta II

Perum Lembaga Penyelenggara Pelayanan Navigasi Penerbangan Indonesia

Perum Percetakan Negara Republik Indonesia

Perum Percetakan Uang Republik Indonesia ("Perum Peruri") and Subsidiaries

Perum Perhutani and Subsidiaries

Perum Pengangkutan Penumpang Djakarta

Perum Perumnas

Perum Produksi Film Negara

PT Adhi Karya (Persero) Tbk and Subsidiaries

PT Amarta Karya (Persero)

PT ASDP Indonesia Ferry (Persero) and Subsidiaries

PT Asuransi Jiwasraya (Persero)

PT Asuransi Sosial Angkatan Bersenjata Republik Indonesia (Persero)

PT Aviasi Pariwisata Indonesia (Persero) and Subsidiaries

PT Bahana Pembinaan Usaha Indonesia (Persero) and Subsidiaries

PT Bank Mandiri (Persero) Tbk and Subsidiaries

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

a. Jenis hubungan (lanjutan)

Pengendalian melalui Pemerintah Republik Indonesia (lanjutan)

PT Bank Rakyat Indonesia (Persero) Tbk dan Entitas Anak
PT Bank Tabungan Negara (Persero) Tbk
PT Barata Indonesia (Persero)
PT Bio Farma (Persero)
PT Boma Bisma Indra (Persero)
PT Brantas Abipraya (Persero)
PT Danareksa (Persero) dan Entitas Anak
PT Djakarta Lloyd (Persero) dan Entitas Anak
PT Dok dan Perkapalan Kodja Bahari (Persero)
PT Dok dan Perkapalan Surabaya (Persero)
PT Garuda Indonesia (Persero) Tbk dan Entitas Anak
PT Hutama Karya (Persero) dan Entitas Anak
PT Indah Karya (Persero)
PT Indra Karya (Persero)
PT Industri Kapal Indonesia (Persero)
PT Industri Kereta Api (Persero) dan Entitas Anak
PT Industri Telekomunikasi Indonesia (Persero)
PT Inspeksi Sertifikasi dan Survey Indonesia
PT Jasa Marga (Persero) Tbk dan Entitas Anak
PT Kereta Api Indonesia (Persero) dan Entitas Anak
PT Krakatau Steel (Persero) dan Entitas Anak
PT Len Industri (Persero) dan Entitas Anak
PT PDI Pulau Batam (Persero)
PT Mineral Industri Indonesia (Persero) dan Entitas Anak
PT Pelabuhan Indonesia (Persero) dan Entitas Anak
PT Pelayaran Nasional Indonesia (Persero) dan Entitas Anak
PT PANN (Persero) dan Entitas Anak
PT Pembangunan Perumahan (Persero) Tbk dan Entitas Anak

46. RELATED PARTY TRANSACTIONS *(continued)*

a. Type of relationships *(continued)*

Control through The Government of The Republic of Indonesia *(continued)*

PT Bank Rakyat Indonesia (Persero) Tbk and Subsidiaries
PT Bank Tabungan Negara (Persero) Tbk
PT Barata Indonesia (Persero)
PT Bio Farma (Persero)
PT Boma Bisma Indra (Persero)
PT Brantas Abipraya (Persero)
PT Danareksa (Persero) and Subsidiaries
PT Djakarta Lloyd (Persero) and Subsidiaries
PT Dok dan Perkapalan Kodja Bahari (Persero)
PT Dok dan Perkapalan Surabaya (Persero)
PT Garuda Indonesia (Persero) Tbk and Subsidiaries
PT Hutama Karya (Persero) and Subsidiaries
PT Indah Karya (Persero)
PT Indra Karya (Persero)
PT Industri Kapal Indonesia (Persero)
PT Industri Kereta Api (Persero) and Subsidiaries
PT Industri Telekomunikasi Indonesia (Persero)
PT Inspeksi Sertifikasi dan Survey Indonesia
PT Jasa Marga (Persero) Tbk and Subsidiaries
PT Kereta Api Indonesia (Persero) and Subsidiaries
PT Krakatau Steel (Persero) and Subsidiaries
PT Len Industri (Persero) and Subsidiaries
PT PDI Pulau Batam (Persero)
PT Mineral Industri Indonesia (Persero) and Subsidiaries
PT Pelabuhan Indonesia (Persero) and Subsidiaries
PT Pelayaran Nasional Indonesia (Persero) and Subsidiaries
PT PANN (Persero) and Subsidiaries
PT Pembangunan Perumahan (Persero) Tbk and Subsidiaries

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

a. Jenis hubungan (lanjutan)

Pengendalian melalui Pemerintah Republik Indonesia (lanjutan)

PT Pengembangan Pariwisata Indonesia (Persero)
PT Perkebunan Nusantara III (Persero) dan Entitas Anak
PT Pertamina (Persero) dan Entitas Anak
PT Perusahaan Listrik Negara ("PLN") (Persero) dan Entitas Anak
PT Pos Indonesia (Persero) dan Entitas Anak
PT Primissima (Persero)
PT Pupuk Indonesia Holding Company (Persero) dan Entitas Anak
PT Rajawali Nusantara Indonesia (Persero) dan Entitas Anak
PT Reasuransi Indonesia Utama (Persero) dan Entitas Anak
PT Semen Indonesia (Persero) Tbk dan Entitas Anak
PT Semen Kupang (Persero)
PT Taspen (Persero) dan Entitas Anak
PT Telkom Indonesia (Persero) Tbk dan Entitas Anak
PT Varuna Tirta Prakasya (Persero)
PT Virama Karya (Persero)
PT Waskita Karya (Persero) Tbk dan Entitas Anak
PT Wijaya Karya (Persero) Tbk dan Entitas Anak
PT Agrinas Pangan Nusantara (Persero)

Entitas Berelasi Lainnya

Badan Pengelola Investasi (BPI) Danantara
Danantara Investment

Pengendalian Kegiatan Bank

Manajemen Kunci

Berdasarkan Kepemilikan dan/atau Kepengurusan

Dana Pensiun ("DP") BNI
Dana Pensiun Lembaga Keuangan ("DPLK") BNI
PT Asuransi Tripakarta

46. RELATED PARTY TRANSACTIONS *(continued)*

a. Type of relationships *(continued)*

Control through The Government of The Republic of Indonesia *(continued)*

PT Pengembangan Pariwisata Indonesia (Persero)
PT Perkebunan Nusantara III (Persero) and Subsidiaries
PT Pertamina (Persero) and Subsidiaries
PT Perusahaan Listrik Negara ("PLN") (Persero) and Subsidiaries
PT Pos Indonesia (Persero) and Subsidiaries
PT Primissima (Persero)
PT Pupuk Indonesia Holding Company (Persero) and Subsidiaries
PT Rajawali Nusantara Indonesia (Persero) and Subsidiaries
PT Reasuransi Indonesia Utama (Persero) and Subsidiaries
PT Semen Indonesia (Persero) Tbk and Subsidiaries
PT Semen Kupang (Persero)
PT Taspen (Persero) and Subsidiaries
PT Telkom Indonesia (Persero) Tbk and Subsidiaries
PT Varuna Tirta Prakasya (Persero)
PT Virama Karya (Persero)
PT Waskita Karya (Persero) Tbk and Subsidiaries
PT Wijaya Karya (Persero) Tbk and Subsidiaries
PT Agrinas Pangan Nusantara (Persero)

Others Related Parties

Badan Pengelola Investasi (BPI) Danantara
Danantara Investment

Control on Bank's Activities

Key Management

By Ownership and/or Management

Dana Pensiun ("DP") BNI
Dana Pensiun Lembaga Keuangan ("DPLK") BNI
PT Asuransi Tripakarta

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***46. RELATED PARTY TRANSACTIONS** (continued)*

b. Giro pada bank lain

b. Current accounts with other banks

	2025	2024	
PT Bank Mandiri (Persero) Tbk	78,450	40,263	*PT Bank Mandiri (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	1,200	2,357	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Tabungan Negara (Persero) Tbk	349	354	*PT Bank Tabungan Negara (Persero) Tbk*
	79,999	**42,974**	

c. Penempatan pada bank lain dan Bank Indonesia

c. Placements with other banks and Bank Indonesia

	2025	2024	
PT Bank Rakyat Indonesia (Persero) Tbk	1,359,000	50,000	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	476,486	1,097,013	*PT Bank Mandiri (Persero) Tbk*
PT Bank Tabungan Negara (Persero) Tbk	218,658	473,178	*PT Bank Tabungan Negara (Persero) Tbk*
	2,054,144	**1,620,191**	

d. Efek-efek

d. Marketable securities

	2025	2024	
PT Danareksa (Persero)	3,228,485	2,758,639	*PT Danareksa (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	2,394,514	1,980,975	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Bank Mandiri (Persero) Tbk	2,087,739	1,278,725	*PT Bank Mandiri (Persero) Tbk*
Kementerian Keuangan Republik Indonesia	1,727,267	1,675,069	*Ministry of Finance of Republic of Indonesia*
PT Bank Rakyat Indonesia (Persero) Tbk	1,457,786	689,192	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT PLN (Persero)	500,978	719,619	*PT PLN (Persero)*
PT Hutama Karya (Persero)	393,958	386,870	*PT Hutama Karya (Persero)*
PT Telkom Indonesia (Persero) Tbk	124,473	221,354	*PT Telkom Indonesia (Persero) Tbk*
PT Pertamina (Persero)	89,967	69,078	*PT Pertamina (Persero)*
PT Bank Tabungan Negara (Persero) Tbk	70,569	24,487	*PT Bank Tabungan Negara (Persero) Tbk*
PT Kereta Api Indonesia (Persero)	50,689	41,635	*PT Kereta Api Indonesia (Persero)*
PT Pupuk Indonesia Holding Company (Persero)	50,123	49,456	*PT Pupuk Indonesia Holding Company (Persero)*
PT Mineral Industri Indonesia (Persero)	36,717	24,465	*PT Mineral Industri Indonesia (Persero)*
PT Semen Indonesia (Persero) Tbk	13,003	117,269	*PT Semen Indonesia (Persero) Tbk*
PT Jasa Marga (Persero) Tbk	6,472	4,825	*PT Jasa Marga (Persero) Tbk*
PT Pelabuhan Indonesia (Persero)	-	65,718	*PT Pelabuhan Indonesia (Persero)*
PT Adhi Karya (Persero) Tbk	-	49,917	*PT Adhi Karya (Persero) Tbk*
PT Pembangunan Perumahan (Persero) Tbk	-	122	*PT Pembangunan Perumahan (Persero) Tbk*
	12,232,740	**10,157,415**	

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan) / *46. RELATED PARTY TRANSACTIONS (continued)*

e. Efek-efek yang dibeli dengan janji dijual kembali / *e. Securities purchased under agreements to resell*

	2025	2024	
PT Bank Rakyat Indonesia (Persero) Tbk	4,023,688	-	PT Bank Rakyat Indonesia (Persero) Tbk

f. Obligasi Pemerintah / *f. Government Bonds*

	2025	2024	
Pemerintah Republik Indonesia	158,574,155	126,661,172	*The Government of the Republic of Indonesia*

g. Wesel ekspor dan tagihan lainnya / *g. Bills and other receivables*

	2025	2024	
PT Bank Mandiri (Persero) Tbk	1,682,682	668,801	*PT Bank Mandiri (Persero) Tbk*
PT Semen Indonesia (Persero) Tbk	1,415,869	1,638,492	*PT Semen Indonesia (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	1,114,319	203,485	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Hutama Karya (Persero)	400,487	993,367	*PT Hutama Karya (Persero)*
PT Bank Tabungan Negara (Persero) Tbk	334,370	-	*PT Bank Tabungan Negara (Persero) Tbk*
PT Danareksa (Persero)	129,529	321,559	*PT Danareksa (Persero)*
PT Adhi Karya (Persero) Tbk	119,883	104,616	*PT Adhi Karya (Persero) Tbk*
PT Telkom Indonesia (Persero) Tbk	73,802	254,117	*PT Telkom Indonesia (Persero) Tbk*
PT Brantas Abipraya (Persero)	34,304	1,905,957	*PT Brantas Abipraya (Persero)*
PT Krakatau Steel (Persero)	21,402	12,198	*PT Krakatau Steel (Persero)*
PT Wijaya Karya (Persero) Tbk	12,290	106,144	*PT Wijaya Karya (Persero) Tbk*
	5,338,937	**6,208,736**	

h. Tagihan akseptasi / *h. Acceptance receivables*

	2025	2024	
PT PLN (Persero)	4,215,534	-	*PT PLN (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	594,443	1,218,513	*PT Pembangunan Perumahan (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	222,537	211,199	*PT Pupuk Indonesia Holding Company (Persero)*
PT Bank Mandiri (Persero) Tbk	197,615	41,509	*PT Bank Mandiri (Persero) Tbk*
PT Hutama Karya (Persero)	182,621	445,931	*PT Hutama Karya (Persero)*
PT Len Industri (Persero)	157,194	266,911	*PT Len Industri (Persero)*
PT Danareksa (Persero)	116,728	146,704	*PT Danareksa (Persero)*
PT Semen Indonesia (Persero) Tbk	115,713	31,933	*PT Semen Indonesia (Persero) Tbk*
PT Krakatau Steel (Persero)	83,228	10,861	*PT Krakatau Steel (Persero)*
PT Brantas Abipraya (Persero)	65,575	38,703	*PT Brantas Abipraya (Persero)*
PT Adhi Karya (Persero) Tbk	39,910	59,769	*PT Adhi Karya (Persero) Tbk*
PT Wijaya Karya (Persero) Tbk	26,986	17,884	*PT Wijaya Karya (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	22,684	-	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Tabungan Negara (Persero) Tbk	13,059	-	*PT Bank Tabungan Negara (Persero) Tbk*
PT Perkebunan Nusantara III (Persero)	-	292,727	*PT Perkebunan Nusantara III (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	-	34,070	*PT Rajawali Nusantara Indonesia* (Persero)
PT Pertamina (Persero)	-	8,546	*PT Pertamina (Persero)*
	6,053,827	**2,825,260**	

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***46. RELATED PARTY TRANSACTIONS** (continued)*

i. Tagihan derivatif

i. Derivative receivables

	2025	2024	
PT PLN (Persero)	730,451	228,720	*PT PLN (Persero)*
PT Pertamina (Persero)	22,177	2,567	*PT Pertamina (Persero)*
PT Bank Mandiri (Persero) Tbk	8,876	57,994	*PT Bank Mandiri (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	6,278	31,689	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	301	20,471	*PT Pupuk Indonesia Holding Company (Persero)*
PT Garuda Indonesia (Persero) Tbk	-	391	*PT Garuda Indonesia (Persero) Tbk*
	768,083	**341,832**	

j. Pinjaman yang diberikan

j. Loans

	2025	2024	
PT Agrinas Pangan Nusantara	46,697,487	-	*PT Agrinas Pangan Nusantara*
Kementerian Keuangan Republik Indonesia	43,888,838	36,774,522	*Ministry of Finance of Republic of Indonesia*
PT PLN (Persero)	21,932,735	8,538,268	*PT PLN (Persero)*
Perum BULOG	20,823,894	19,742,438	*Perum BULOG*
PT Jasa Marga (Persero) Tbk	17,908,134	14,511,463	*PT Jasa Marga (Persero) Tbk*
PT Telkom Indonesia (Persero) Tbk	13,745,080	7,577,536	*PT Telkom Indonesia (Persero) Tbk*
PT Waskita Karya (Persero) Tbk	11,163,803	11,476,159	*PT Waskita Karya (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	11,140,324	7,821,688	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Perkebunan Nusantara III (Persero)	7,503,233	7,540,939	*PT Perkebunan Nusantara III (Persero)*
PT Kereta Api Indonesia (Persero)	5,422,177	4,687,982	*PT Kereta Api Indonesia (Persero)*
PT Krakatau Steel (Persero)	4,623,097	4,699,123	*PT Krakatau Steel (Persero)*
PT Mineral Industri Indonesia (Persero)	3,825,930	3,244,823	*PT Mineral Industri Indonesia (Persero)*
PT Garuda Indonesia (Persero)	3,677,027	3,695,998	*PT Garuda Indonesia (Persero)*
PT Len Industri (Persero)	3,482,726	3,583,348	*PT Len Industri (Persero)*
PT Semen Indonesia (Persero) Tbk	3,391,749	3,019,880	*PT Semen Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	3,300,957	4,055,706	*PT Pupuk Indonesia Holding Company (Persero)*
PT Pertamina (Persero)	2,828,372	4,288,892	*PT Pertamina (Persero)*
PT Aviasi Pariwisata Indonesia (Persero)	2,348,599	2,065,008	*PT Aviasi Pariwisata Indonesia (Persero)*
PT Wijaya Karya (Persero) Tbk	1,780,077	1,995,018	*PT Wijaya Karya (Persero) Tbk*
PT Bio Farma (Persero)	1,602,774	2,171,366	*PT Bio Farma (Persero)*
PT Adhi Karya (Persero) Tbk	1,524,645	1,667,599	*PT Adhi Karya (Persero) Tbk*
PT Hutama Karya (Persero)	1,472,571	1,813,312	*PT Hutama Karya (Persero)*
PT Bank Mandiri (Persero) Tbk	1,071,875	-	*PT Bank Mandiri (Persero) Tbk*
PT Industri Kereta Api (Persero)	1,016,023	-	*PT Industri Kereta Api (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	690,640	925,702	*PT Rajawali Nusantara Indonesia (Persero)*
PT Danareksa (Persero)	437,596	370,052	*PT Danareksa (Persero)*
PT Brantas Abipraya (Persero)	359,756	-	*PT Brantas Abipraya (Persero)*
PT Pos Indonesia (Persero)	343,350	369,777	*PT Pos Indonesia (Persero)*
Manajemen Kunci	274,385	236,667	*Key Management*
PT Bahana Pembinaan Usaha Indonesia (Persero)	217,391	631,450	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
Perum Peruri	141,384	124,998	*Perum Peruri*
Perum Perumnas	108,048	127,876	*Perum Perumnas*
PT Agrinas Jaladri Nusantara (Persero)	100,093	54,444	*PT Agrinas Jaladri Nusantara (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	95,386	540,958	*PT Pembangunan Perumahan (Persero) Tbk*
PT Pengembangan Pariwisata Indonesia (Persero)	42,952	67,925	*PT Pengembangan Pariwisata Indonesia (Persero)*
PT ASDP Indonesia Ferry (Persero)	32,396	-	*PT ASDP Indonesia Ferry (Persero)*
PT Pelabuhan Indonesia (Persero)	900	870,708	*PT Pelabuhan Indonesia (Persero)*
BPJS Kesehatan	221	180	*BPJS Kesehatan*
Lain-lain	176	110,884	*Others*
	239,016,801	**159,402,689**	

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***46. RELATED PARTY TRANSACTIONS** (continued)*

k. Investasi pada entitas asosiasi dan penyertaan saham

k. Investment in associates and equity investments

	2025	2024	
PT Bank Syariah Indonesia Tbk	14,354,281	12,748,127	*PT Bank Syariah Indonesia Tbk*
PT Fintek Karya Nusantara	290,674	369,614	*PT Fintek Karya Nusantara*
	14,644,955	**13,117,741**	

l. Simpanan nasabah

l. Deposits from customers

	2025	2024	
Entitas dikendalikan melalui Pemerintah Republik Indonesia dan entitas berelasi lainnya	290,523,906	112,692,952	*Entities controlled through the Government of Republic of Indonesia and other related parties*
Manajemen Kunci	284,003	140,859	*Key Management*
	290,807,909	**112,833,811**	

m. Simpanan dari bank lain

m. Deposits from other banks

	2025	2024	
PT Bank Tabungan Negara (Persero) Tbk	1,035,920	785,404	*PT Bank Tabungan Negara (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	1,011,607	1,993,931	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	897,805	1,385,362	*PT Bank Mandiri (Persero) Tbk*
	2,945,332	**4,164,697**	

n. Efek-efek yang diterbitkan

n. Securities issued

	2025	2024	
PT Bank Rakyat Indonesia (Persero) Tbk	617,269	352,030	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	430,739	55,983	*PT Bank Mandiri (Persero) Tbk*
DPLK BNI	339,802	59,982	*DPLK BNI*
PT Bahana Pembinaan Usaha Indonesia (Persero)	234,880	85,976	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Taspen (Persero)	99,933		*PT Taspen (Persero)*
DP BNI	49,974	14,995	*DP BNI*
Kementerian Keuangan Republik Indonesia	49,966	619,938	*Ministry of Finance of the Republic of Indonesia*
PT Reasuransi Indonesia Utama (Persero)	49,966	19,998	*PT Reasuransi Indonesia Utama (Persero)*
PT Pertamina (Persero)	12,999	12,996	*PT Pertamina (Persero)*
BPJS Ketenagakerjaan	-	629,938	*BPJS Ketenagakerjaan*
PT Asabri (Persero)	-	39,996	*PT Asabri (Persero)*
	1,885,528	**1,891,832**	

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan) / *46. RELATED PARTY TRANSACTIONS (continued)*

o. Pinjaman yang diterima / *o. Borrowings*

	2025	2024	
PT Bank Mandiri (Persero) Tbk	1,374,215	1,525,654	*PT Bank Mandiri (Persero) Tbk*
Kementerian Keuangan Republik Indonesia	53,798	48,557	*Ministry of Finance of the Republic of Indonesia*
	1,428,013	**1,574,211**	

p. Efek-efek subordinasi / *p. Subordinated securities*

	2025	2024	
PT Bank Mandiri (Persero) Tbk	3,335	3,218	*PT Bank Mandiri (Persero) Tbk*

q. Liabilitas derivatif / *q. Derivative payables*

	2025	2024	
PT PLN (Persero)	926,086	69,964	*PT PLN (Persero)*
PT Pertamina (Persero)	21,872	26,893	*PT Pertamina (Persero)*
PT Bank Mandiri (Persero) Tbk	19,214	37,180	*PT Bank Mandiri (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	9,633	20,803	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	168	-	*PT Pupuk Indonesia Holding Company (Persero)*
PT Waskita Karya (Persero) Tbk	88	-	*PT Waskita Karya (Persero) Tbk*
PT Jasa Marga (Persero) Tbk	58	-	*PT Jasa Marga (Persero) Tbk*
	977,119	**154,840**	

r. Liabilitas akseptasi / *r. Acceptance payables*

	2025	2024	
PT Bank Mandiri (Persero) Tbk	303,819	834,268	*PT Bank Mandiri (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	141,867	-	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Pupuk Indonesia Holding Company (Persero)	37,628	-	*PT Pupuk Indonesia Holding Company (Persero)*
PT Krakatau Steel (Persero)	9,143	-	*PT Krakatau Steel (Persero)*
PT Semen Indonesia (Persero) Tbk	5,543	7,006	*PT Semen Indonesia (Persero) Tbk*
PT Waskita Karya (Persero)	3,127	18,084	*PT Waskita Karya (Persero)*
PT Hutama Karya (Persero)	387	-	*PT Hutama Karya (Persero)*
PT Len Industri (Persero)	98	-	*PT Len Industri (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	-	41,394	*PT Rajawali Nusantara Indonesia (Persero)*
PT Wijaya Karya (Persero) Tbk	-	3	*PT Wijaya Karya (Persero) Tbk*
	501,612	**900,755**	

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan) / *46. RELATED PARTY TRANSACTIONS (continued)*

s. Efek-efek yang dijual dengan janji dibeli kembali / *s. Securities sold under agreements to repurchase*

	2025	2024	
PT Bank Mandiri (Persero) Tbk	52,153	-	*PT Bank Mandiri (Persero) Tbk*

t. Garansi bank yang diterbitkan / *t. Bank guarantees issued*

	2025	2024	
PT Pertamina (Persero)	4,684,240	4,728,735	*PT Pertamina (Persero)*
PT Pupuk Indonesia Holding Company (Persero)	3,356,801	3,114,170	*PT Pupuk Indonesia Holding Company (Persero)*
PT Len Industri (Persero)	2,601,077	781,896	*PT Len Industri (Persero)*
PT Hutama Karya (Persero)	2,344,532	2,964,796	*PT Hutama Karya (Persero)*
PT Adhi Karya (Persero) Tbk	2,003,294	1,648,980	*PT Adhi Karya (Persero) Tbk*
PT Telkom Indonesia (Persero) Tbk	1,640,953	1,596,544	*PT Telkom Indonesia (Persero) Tbk*
PT Danareksa (Persero)	1,434,090	1,549,760	*PT Danareksa (Persero)*
PT PLN (Persero)	1,350,847	363,999	*PT PLN (Persero)*
PT Wijaya Karya (Persero) Tbk	1,325,273	1,761,163	*PT Wijaya Karya (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	1,156,345	1,942,939	*PT Bank Mandiri (Persero) Tbk*
PT Brantas Abipraya (Persero)	691,392	551,718	*PT Brantas Abipraya (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	394,730	514,688	*PT Pembangunan Perumahan (Persero) Tbk*
PT Waskita Karya (Persero) Tbk	297,874	301,927	*PT Waskita Karya (Persero) Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	240,606	96,802	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Inspeksi Sertifikasi Dan Survey Indonesia	139,130	164,897	*PT Inspeksi Sertifikasi Dan Survey Indonesia*
Perum Peruri	132,615	89,932	*Perum Peruri*
PT Pengembangan Pariwisata Indonesia (Persero)	83,262	58,199	*PT Pengembangan Pariwisata Indonesia (Persero)*
PT Semen Indonesia (Persero) Tbk	69,017	72,760	*PT Semen Indonesia (Persero) Tbk*
PT Pelabuhan Indonesia (Persero)	62,829	62,792	*PT Pelabuhan Indonesia (Persero)*
PT Industri Kereta Api (Persero)	58,592	50,870	*PT Industri Kereta Api (Persero)*
PT Krakatau Steel (Persero)	47,804	5,249	*PT Krakatau Steel (Persero)*
PT Asuransi Tripakarta	47,091	48,287	*PT Asuransi Tripakarta*
PT Jasa Marga (Persero) Tbk	39,000	150,375	*PT Jasa Marga (Persero) Tbk*
PT Rajawali Nusantara Indonesia (Persero)	36,161	36,551	*PT Rajawali Nusantara Indonesia (Persero)*
PT Aviasi Pariwisata Indonesia (Persero)	32,044	45,025	*PT Aviasi Pariwisata Indonesia (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	23,887	38,019	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Agrinas Jaladri Nusantara (Persero)	18,091	35,649	*PT Agrinas Jaladri Nusantara (Persero)*
PT Garuda Indonesia (Persero)	4,010	196	*PT Garuda Indonesia (Persero)*
PT Mineral Industri Indonesia (Persero)	3,594	76	*PT Mineral Industri Indonesia (Persero)*
PT Kereta Api Indonesia (Persero)	3,019	-	*PT Kereta Api Indonesia (Persero)*
PT Pos Indonesia (Persero)	1,701	1,701	*PT Pos Indonesia (Persero)*
PT Agrinas Palma Nusantara (Persero)	1,655	6,655	*PT Agrinas Palma Nusantara (Persero)*
Perum Jasa Tirta I	525	-	*Perum Jasa Tirta I*
PT Industri Telekomunikasi Indonesia (Persero)	502	308	*PT Industri Telekomunikasi Indonesia (Persero)*
PT Amarta Karya (Persero)	-	2,403	*PT Amarta Karya (Persero)*
PT Barata Indonesia (Persero)	-	1,650	*PT Barata Indonesia (Persero)*
Perum Perumnas	-	601	*Perum Perumnas*
PT Bio Farma (Persero)	-	74	*PT Bio Farma (Perseo)*
	24,326,583	**22,790,386**	

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

***46. RELATED PARTY TRANSACTIONS** (continued)*

u. *Irrevocable Letters of Credit*

u. Irrevocable Letters of Credit

	2025	2024	
PT Pelabuhan Indonesia (Persero)	1,684,188	-	*PT Pelabuhan Indonesia (Persero)*
PT Pertamina (Persero)	1,631,382	1,017,057	*PT Pertamina (Persero)*
Kementerian Keuangan Republik Indonesia	745,755	-	*Ministry of Finance of Republic of Indonesia*
PT Len Industri (Persero)	691,708	337,571	*PT Len Industri (Persero)*
PT Pupuk Indonesia Holding Company (Persero)	518,110	413,435	*PT Pupuk Indonesia Holding Company (Persero)*
PT Kereta Api Indonesia (Persero)	517,303	8,682	*PT Kereta Api Indonesia (Persero)*
PT PLN (Persero)	288,995	135,576	*PT PLN (Persero)*
PT Krakatau Steel (Persero)	189,729	27,117	*PT Krakatau Steel (Persero)*
Perum Peruri	167,590	21,665	*Perum Peruri*
PT Danareksa (Persero)	91,570	91,521	*PT Danareksa (Persero)*
PT Semen Indonesia (Persero) Tbk	90,289	82,114	*PT Semen Indonesia (Persero) Tbk*
PT Perkebunan Nusantara III (Persero)	83,636	11,122	*PT Perkebunan Nusantara III (Persero)*
PT Industri Kereta Api (Persero)	63,271	573,806	*PT Industri Kereta Api (Persero)*
PT Hutama Karya (Persero)	20,625	185,879	*PT Hutama Karya (Persero)*
PT Pelayaran Nasional Indonesia (Persero)	11,858	10,802	*PT Pelayaran Nasional Indonesia* (Persero)
PT Brantas Abipraya (Persero)	8,427	10,256	*PT Brantas Abipraya (Persero)*
PT Mineral Industri Indonesia (Persero)	4,169	792	*PT Mineral Industri Indonesia (Persero)*
PT Wijaya Karya (Persero) Tbk	230	22,597	*PT Wijaya Karya (Persero) Tbk*
PT Pembangunan Perumahan (Persero) Tbk	-	548,384	*PT Pembangunan Perumahan (Persero) Tbk*
Perum BULOG	-	398,922	*Perum BULOG*
PT Adhi Karya (Persero) Tbk	-	11,051	*PT Adhi Karya (Persero) Tbk*
	6,808,835	**3,908,349**	

v. Fasilitas pinjaman yang belum ditarik

v. Unused loan facilities

	2025	2024	
PT Agrinas Pangan Nusantara (Persero)	19,302,513	-	*PT Agrinas Pangan Nusantara (Persero)*
Kementerian Keuangan Republik Indonesia	7,320,156	5,841,173	*Ministry of Finance of the Republic Indonesia*
PT Pupuk Indonesia Holding Company (Persero)	4,263,398	2,713,792	*PT Pupuk Indonesia Holding Company (Persero)*
PT Telkom Indonesia (Persero) Tbk	3,664,484	3,687,389	*PT Telkom Indonesia (Persero) Tbk*
PT Krakatau Steel (Persero)	1,259,496	1,208,377	*PT Krakatau Steel (Persero)*
PT Bank Rakyat Indonesia (Persero) Tbk	460,619	902,905	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Pertamina (Persero)	458,293	19,261	*PT Pertamina (Persero)*
PT Len Industri (Persero)	278,628	211,191	*PT Len Industri (Persero)*
PT Hutama Karya (Persero)	115,152	152,571	*PT Hutama Karya (Persero)*
Manajemen Kunci	69,660	61,177	*Key Management*
PT Danareksa (Persero)	51,569	1,277	*PT Danareksa (Persero)*
PT Brantas Abipraya (Persero)	25,000	25,000	*PT Brantas Abipraya (Persero)*
PT PLN (Persero)	13,673	1,014,647	*PT PLN (Persero)*
PT Semen Indonesia (Persero) Tbk	8,684	10,226	*PT Semen Indonesia (Persero) Tbk*
PT Mineral Industri Indonesia (Persero)	6,378	5,073	*PT Mineral Industri Indonesia (Persero)*
BPJS Kesehatan	6,021	5,026	*BPJS Kesehatan*
Perum BULOG	5,223	155,218	*Perum BULOG*
PT Pelabuhan Indonesia (Persero)	5,201	3,957	*PT Pelabuhan Indonesia (Persero)*
PT Industri Kereta Api (Persero)	5,000	-	*PT Industri Kereta Api (Persero)*
PT Pembangunan Perumahan (Persero) Tbk	4,614	1,934	*PT Pembangunan Perumahan (Persero) Tbk*

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

46. RELATED PARTY TRANSACTIONS *(continued)*

v. Fasilitas pinjaman yang belum ditarik (lanjutan)

v. Unused loan facilities *(continued)*

	2025	2024	
PT Kereta Api Indonesia (Persero)	4,062	5,206	*PT Kereta Api Indonesia (Persero)*
PT Bahana Pembinaan Usaha Indonesia (Persero)	3,553	3,579	*PT Bahana Pembinaan Usaha Indonesia (Persero)*
PT Aviasi Pariwisata Indonesia (Persero)	3,382	2,944	*PT Aviasi Pariwisata Indonesia (Persero)*
PT Perkebunan Nusantara III (Persero)	2,778	2,188	*PT Perkebunan Nusantara III (Persero)*
PT Garuda Indonesia (Persero)	1,876	447	*PT Garuda Indonesia (Persero)*
Perum Peruri	1,724	1,711	*Perum Peruri*
PT Bio Farma (Persero)	1,246	1,095	*PT Bio Farma (Persero)*
PT Asuransi Tripakarta	1,040	961	*PT Asuransi Tripakarta*
PT Waskita Karya (Persero) Tbk	777	821	*PT Waskita Karya (Persero) Tbk*
PT Adhi Karya (Persero) Tbk	722	966	*PT Adhi Karya (Persero) Tbk*
PT Primissima (Persero)	396	393	*PT Primissima (Persero)*
PT Rajawali Nusantara Indonesia (Persero)	373	115,156	*PT Rajawali Nusantara Indonesia (Persero)*
PT Agrinas Jaladri Nusantara (Persero)	192	15,556	*PT Agrinas Jaladri Nusantara (Persero)*
PT Djakarta Lloyd (Persero)	52	21	*PT Djakarta Lloyd (Persero)*
PT Asuransi Jiwasraya (Persero)	10	270	*PT Asuransi Jiwasraya (Persero)*
	37,345,945	**16,171,508**	

w. Gaji dan tunjangan

Imbalan kerja jangka pendek dan imbalan kerja jangka panjang yang dibayarkan untuk Dewan Komisaris, Direksi, Komite Audit, serta *Senior Executive Vice President* (SEVP), *Executive Vice President* (EVP) dan *Senior Vice President* (SVP) untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp467.040 dan Rp1.019.576 atau 1,51% dan 3,50% dari jumlah beban operasional lainnya konsolidasian dengan rincian sebagai berikut:

w. Salaries and employees' benefits

Short-term employment benefits and Long-term employment benefits paid to the Boards of Commissioners, Directors, Audit Committee and Senior Executive Vice President, Executive Vice President and Senior Vice President for the year ended 31 December 2025 and 2024 amounted to Rp467,040 and Rp1,019,576 or 1.51% and 3.50% of total consolidated other operating expenses, respectively, as follows:

	2025	2024	
Imbalan kerja jangka pendek	402,446	369,898	*Short-term employment benefits*
Imbalan kerja jangka panjang*)	64,594	649,678	*Long-term employment benefits**)
	467,040	**1,019,576**	

*) Tidak termasuk dalam imbalan kerja jangka panjang adalah bonus performa tahun 2024 kepada Dewan Komisaris, Direksi, Komite Audit, SEVP dan SVP yang belum dibayarkan di tahun 2025

*) *Not included in long-term employment benefits are performance bonuses 2024 payable to the Board of Commissioners, Directors, Audit Committee, SEVP and SVP which have not yet been paid in 2025.*

46. TRANSAKSI DENGAN PIHAK BERELASI (lanjutan)

46. *RELATED PARTY TRANSACTIONS (continued)*

Rincian saldo transaksi dengan pihak-pihak berelasi pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The details of balances of transactions with related parties as of 31 December 2025 and 2024 are as follows:

	2025	2024	
Aset			***Assets***
Giro pada bank lain	79,999	42,974	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	2,054,144	1,620,191	*Placements with other banks and Bank Indonesia*
Efek-efek	12,232,740	10,157,415	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	4,023,688	-	*Securities purchased under agreements to resell*
Obligasi Pemerintah	158,574,155	126,661,172	*Government Bonds*
Wesel ekspor dan tagihan lainnya	5,338,937	6,208,736	*Bills and other receivables*
Tagihan akseptasi	6,053,827	2,825,260	*Acceptance receivables*
Tagihan derivatif	768,083	341,832	*Derivative receivables*
Pinjaman yang diberikan	239,016,801	159,402,689	*Loans*
Investasi pada entitas asosiasi dan penyertaan saham	14,644,955	13,117,741	*Investment in associates and equity investments*
Jumlah aset kepada pihak-pihak berelasi	442,787,329	320,378,010	*Total assets with related parties*
Jumlah aset konsolidasian	1,362,054,731	1,130,128,862	*Total consolidated assets*
Persentase jumlah aset kepada pihak-pihak berelasi terhadap jumlah aset konsolidasian	32.5%	28.3%	*Percentage of total assets with related parties to total consolidated assets*
Liabilitas			***Liabilities***
Simpanan nasabah	290,807,909	112,833,811	*Deposits from customers*
Simpanan dari bank lain	2,945,332	4,164,697	*Deposits from other banks*
Efek-efek yang diterbitkan	1,885,528	1,891,832	*Securities issued*
Pinjaman yang diterima	1,428,013	1,574,211	*Borrowings*
Efek-efek subordinasi	3,335	3,218	*Subordinated securities*
Liabilitas derivatif	977,119	154,840	*Derivative payables*
Liabilitas akseptasi	501,612	900,755	*Acceptance payables*
Efek-efek yang dijual dengan janji dibeli kembali	52,153	-	*Securities sold under agreements to repurchase*
Jumlah liabilitas kepada pihak-pihak berelasi	298,601,001	121,523,364	*Total liabilities with related parties*
Jumlah liabilitas konsolidasian	1,185,715,363	963,580,855	*Total consolidated liabilities*
Persentase jumlah liabilitas kepada pihak-pihak berelasi terhadap jumlah liabilitas konsolidasian	25.2%	12.6%	*Percentage of total liabilities with related parties to total consolidated liabilities*

47. SEGMEN OPERASI

Grup menerapkan Konsep 3 Dimensi untuk penilaian kinerja secara internal yaitu Dimensi Segmen, Dimensi *Channel* dan Dimensi Produk. Untuk kepentingan pelaporan Segmen, maka yang dilaporkan adalah berdasarkan Dimensi Segmen.

Di bawah ini adalah penjelasan mengenai pelaporan masing-masing segmen per 31 Desember 2025 dan 2024:

- ***Corporate Banking*****:** termasuk pinjaman yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya milik nasabah korporasi, baik BUMN dan badan usaha swasta.
- ***Institutional Banking*****:** termasuk pinjaman yang diberikan, simpanan nasabah dan dan transaksi-transaksi lainnya milik nasabah Kementerian, Lembaga Pemerintah, yayasan dan universitas.
- ***Commercial Banking***: termasuk pinjaman yang diberikan, simpanan nasabah dan dan transaksi-transaksi lainnya milik nasabah dengan skala menengah/komersial serta nasabah SME dan kredit program.
- ***Consumer Banking***: termasuk pinjaman yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya milik nasabah konsumer termasuk kredit pembiayaan konsumsi termasuk kredit kepemilikan rumah, kartu kredit serta produk dan jasa lainnya seperti dana pihak ketiga, transaksi pembayaran dan transaksi-transaksi lainnya milik nasabah perorangan.
- ***Treasury & International Banking*****:** terkait dengan kegiatan treasuri Bank termasuk transaksi valuta asing, *money market, fixed income* dan pasar modal serta pinjaman yang diberikan, simpanan nasabah dan transaksi-transaksi lainnya milik nasabah institusi keuangan dan nasabah kantor cabang luar negeri.
- **Kantor Pusat**: terutama mengelola aset dan liabilitas Grup selain yang telah dikelola oleh segmen operasi lainnya termasuk menerima alokasi biaya atas penyediaan jasa servis secara sentralisasi kepada segmen lainnya serta pendapatan/biaya yang tidak teralokasi ke pelaporan segmen lainnya.

47. OPERATING SEGMENT

The Group applies the 3 Dimensional Concept for internal performance assessment, namely Segment, Channel and Product Dimensions. For the purpose of Segment reporting, what is reported is based on the Segment Dimension.

Below is an explanation of the reporting of each segment as of 31 December 2025 and 2024:

- ***Corporate Banking:*** *including loans, customer deposits and other transactions belonging to corporate customers, both BUMN and private business entities.*
- ***Institutional Banking:*** *including loans, customer deposits and other transactions belonging to customers of Ministries, Government Institutions, foundations and universities.*
- ***Commercial Banking:*** *including loans, customer deposits and other transactions belonging to customers of middle/commercial and also SME and credit program customer.*
- ***Consumer Banking:*** *including loans, customer deposits and other transactions belonging to consumer customers including consumer financing loans including home ownership loans, credit cards, other products and services such as third party funds, payment transactions and other transactions belonging to customers individual.*
- ***Treasury & International Banking:*** *related to the Bank's treasury activities including foreign exchange transactions, money market, fixed income, and capital market and also loans, customer deposits and other transactions belonging to financial institutions and overseas branch customers.*
- ***Head Office:*** *mainly manages the Group's assets and liabilities in addition to those already managed by other operating segments including receiving cost allocation for centralised service provision to other segments as well as revenues/costs that are not allocated to other segment reporting*.

47. SEGMEN OPERASI (lanjutan)

Di bawah ini adalah penjelasan mengenai pelaporan masing-masing segmen per 31 Desember 2025 dan 2024: (lanjutan)

- **Entitas Anak**: seluruh transaksi yang dilakukan oleh Entitas Anak yang bergerak di bidang asuransi, pembiayaan konsumen, perbankan, modal ventura dan sekuritas.

Kinerja diukur berdasarkan laba segmen sebelum pajak penghasilan, sebagaimana dilaporkan dalam laporan internal manajemen yang ditelaah oleh Manajemen Bank. Keuntungan segmen digunakan untuk mengukur kinerja dimana manajemen berkeyakinan bahwa informasi tersebut paling relevan dalam mengevaluasi hasil segmen tersebut relatif terhadap entitas lain yang beroperasi dalam industri tersebut.

Di tahun 2024, Grup mengungkapkan segmen operasionalnya berdasarkan segmen usaha sebagai berikut: *Wholesale & International Banking, Institutional Banking, Enterprises & Commercial Banking, Retail Banking, Treasury,* Kantor Pusat dan Entitas Anak dengan terdapat reklasifikasi di masing-masing bisnis segmen sesuai dengan organisasi direksi dan pembidangan yang baru.

Di tahun 2025, Grup menerapkan perubahan terhadap pengelompokan segmen operasi berdasarkan SK Penataan Organisasi Direksi tanggal 1 Agustus 2025, Grup mengungkapkan segmen operasionalnya berdasarkan segmen usaha sebagai berikut: *Corporate Banking, Institutional Banking, Commercial Banking, Consumer Banking, Treasury & International Banking*, Kantor Pusat dan Entitas Anak, dengan terdapat reklasifikasi di masing-masing bisnis segmen sesuai dengan organisasi direksi dan pembidangan mengacu pada Penataan Organisasi Direksi tersebut.

***47. OPERATING SEGMENT** (continued)*

Below is an explanation of the reporting of each segment as of 31 December 2025 and 2024: (continued)

- ***Subsidiaries:** all transactions conducted by Subsidiaries engaged in insurance, consumer financing, banking, venture capital and securities.*

Performance is measured based on segment profit before income tax, as included in the internal management reports that are reviewed by the Bank's Management. Segment profit is used to measure performance of that business segment as management believes that such information is the most relevant in evaluating the results of those segments relative to other entities that operate within these industries.

In 2024, the Group disclosing its operational segments based on business segments as follows: Wholesale & International Banking, Institutional Banking, Enterprises & Commercial Banking, Retail Banking, Treasury, Head Office and Subsidiaries with some reclassification for each business segments referring to the new organizational of board of directors.

In 2025, the Group implemented changes to the grouping of operating segments based on the Board of Directors' Decree on Organizational Restructuring dated 1 August 2025. The Group discloses its operating segments by business line as follows: Corporate Banking; Institutional Banking; Commercial Banking; Consumer Banking; Treasury & International Banking; Head Office; and Subsidiaries. Reclassifications have been made within each business segment in accordance with the Board's organizational structure and functional assignments under that Decree.

47. SEGMEN OPERASI (lanjutan)

47. *OPERATING SEGMENT (continued)*

Informasi yang berkaitan dengan segmen usaha yang utama dari Grup pada tahun 31 Desember 2025 dan 2024 disajikan dalam tabel di bawah ini:

Information relating to the Group's main business segments as of 31 December 2025 and 2024 is presented in the table below:

	2025									
	Corporate Banking/ *Corporate Banking*	Institutional Banking/ *Institutional Banking*	Commercial Banking/ *Commercial Banking*	Consumer Banking/ *Consumer Banking*	Treasuri & Internasional/ *Treasury & International*	Kantor Pusat/ *Head Office*	Entitas Anak/ *Subsidiaries*	Penyesuaian dan eliminasi/ *Adjustment and elimination***)	Konsolidasian/ *Consolidation*	
Pendapatan Bunga - Bersih*)	9,972,599	2,305,700	11,522,314	13,863,376	1,580,372	-	1,086,351	2,483	40,333,195	*Interest Income - Net*)
Pendapatan Premi - Bersih	-	-	-	-	-	-	(1,523)	-	(1,523)	*Premium Income - Net*
Pendapatan Asuransi dan Hasil Investasi - Bersih	-	-	-	-	-	-	799,916	(55,200)	744,716	*Insurance Income and Investment Return - Net*
Pendapatan Operasional Lainnya	3,466,179	143,612	5,398,979	8,050,810	4,022,288	2,268,038	773,580	(223,524)	23,899,962	*Other Operating Income*
Pembentukan Cadangan Penurunan Nilai	133,391	(10,874)	(6,214,409)	(2,998,760)	(46,838)	175,298	(568,116)	(194,062)	(9,724,370)	*Allowance for Impairment Losses*
Beban Operasional Lainnya	(3,120,782)	(1,023,385)	(6,740,035)	(11,984,278)	(1,919,314)	(4,305,019)	(1,849,964)	86,421	(30,856,356)	*Other Operating expenses*
Laba (Rugi) Operasional	10,451,387	1,415,053	3,966,849	6,931,148	3,636,508	(1,861,683)	240,244	(383,882)	24,395,624	*Operating Income (Loss)*
Pendapatan (Beban) Bukan Operasional - Bersih	-	-	-	-	-	15,848	(12,551)	(1,458)	1,839	*Non Operating Income (Expense) - Net*
Laba Sebelum Pajak	10,451,387	1,415,053	3,966,849	6,931,148	3,636,508	(1,845,835)	227,693	(385,340)	24,397,463	*Income Before Tax*
Beban Pajak	-	-	-	-	-	(4,205,136)	(81,287)	-	(4,286,423)	*Tax Expense*
Laba Bersih	10,451,387	1,415,053	3,966,849	6,931,148	3,636,508	(6,050,971)	146,406	(385,340)	20,111,040	*Net Income*
Total aset	492,426,765	46,330,183	239,727,784	174,310,133	353,538,881	-	63,718,597	(7,997,612)	1,362,054,731	*Total asset*
Total liabilitas	286,823,584	226,312,754	208,064,085	319,864,440	97,309,817	-	50,570,656	(3,229,973)	1,185,715,363	*Total liabilities*

	2024***)									
	Corporate Banking/ *Corporate Banking*	Institutional Banking/ *Institutional Banking*	Commercial Banking/ *Commercial Banking*	Consumer Banking/ *Consumer Banking*	Treasuri & Internasional/ *Treasury & International*	Kantor Pusat/ *Head Office*	Entitas Anak/ *Subsidiaries*	Penyesuaian dan eliminasi/ *Adjustment and elimination***)	Konsolidasian/ *Consolidation*	
Pendapatan Bunga - Bersih*)	9,511,795	2,559,885	11,977,222	13,941,048	1,498,129	-	990,151	1,975	40,480,205	*Interest Income - Net*)
Pendapatan Premi - Bersih	-	-	-	-	-	-	(1,752)	(52)	(1,804)	*Premium Income - Net*
Pendapatan Asuransi dan Hasil Investasi - Bersih	-	-	-	-	-	-	768,096	-	768,096	*Insurance Income and Investment Return - Net*
Pendapatan Operasional Lainnya	3,791,888	138,977	5,061,927	8,053,392	3,083,639	1,687,952	1,036,904	(205,500)	22,649,179	*Other Operating Income*
Pembentukan Cadangan Penurunan Nilai	2,102,720	(19,029)	(6,906,060)	(2,336,973)	(24,642)	(796,694)	(229,884)	-	(8,210,562)	*Allowance for Impairment Losses*
Beban Operasional Lainnya	(2,949,594)	(977,464)	(6,481,098)	(11,406,604)	(1,730,048)	(3,800,879)	(1,865,821)	99,282	(29,112,226)	*Other Operating expenses*
Laba (Rugi) Operasional	12,456,809	1,702,369	3,651,991	8,250,863	2,827,078	(2,909,621)	697,694	(104,295)	26,572,888	*Operating Income (Loss)*
Pendapatan (Beban) Bukan Operasional – Bersih	-	-	-	-	-	85,290	(87,758)	(1,329)	(3,797)	*Non Operating Income (Expense) - Net*
Laba Sebelum Pajak	12,456,809	1,702,369	3,651,991	8,250,863	2,827,078	(2,824,331)	609,936	(105,624)	26,569,091	*Income Before Tax*
Beban Pajak	-	-	-	-	-	(4,858,442)	(41,252)	-	(4,899,694)	*Tax Expense*
Laba Bersih	12,456,809	1,702,369	3,651,991	8,250,863	2,827,078	(7,682,773)	568,684	(105,624)	21,669,397	*Net Income*
Total aset	410,695,336	42,843,155	204,907,460	158,920,737	267,057,901	-	53,377,119	(7,672,846)	1,130,128,862	*Total asset*
Total liabilitas	213,016,587	126,003,254	166,153,490	315,071,289	106,078,189	-	40,362,184	(3,104,138)	963,580,855	*Total liabilities*

*) termasuk komponen *internal transfer pricing* antar segmen operasi
**) termasuk eliminasi *internal transfer pricing* atau reklasifikasi antar segmen operasi dan eliminasi terhadap Entitas Anak
***) disajikan kembali berdasarkan pengelompokan segmen operasi berdasarkan SK Penataan Organisasi Direksi tanggal 1 Agustus 2025.

*) *Includes components of internal transfer pricing between operating segment*
**) *Includes elimination of internal transfer pricing or reclassification between operating segment and elimination of Subsidiaries*
***) *Restated and presented based on the grouping of operating segments under the Board of Directors' Decree on Organizational Restructuring dated 1 August 2025.*

47. SEGMEN OPERASI (lanjutan)

47. OPERATING SEGMENT (continued)

Informasi yang berkaitan dengan segmen geografis BNI dan Entitas Anak disajikan dalam tabel di bawah ini:

Information concerning the geographical segments of BNI and Subsidiaries are set out in the tables below:

	2025						
	Indonesia	**New York**	**Eropa/ *Europe***	**Asia**	**Penyesuaian dan eliminasi/ *Adjustment and elimination***	**Konsolidasian /*Consolidated***	
Pendapatan Bunga - Bersih	38,928,911	280,915	169,767	951,119	2,483	40,333,195	*Interest Income - Net*
Pendapatan Premi - Bersih	(1,523)	-	-	-		(1,523)	*Premium Income - Net*
Pendapatan Asuransi dan Hasil Investasi- Bersih	799,916	-	-	-	(55,200)	744,716	*Premium Income and Invesment Return - Net*
Pendapatan Operasional lainnya	23,151,826	63,647	315,135	592,878	(223,524)	23,899,962	*Other Operating Income*
(Pembentukan)/pemulihan Cadangan Kerugian Penurunan Nilai	(9,529,662)	332	28,310	(29,288)	(194,062)	(9,724,370)	*(Allowance)/ Reversal For Impairment Losses*
Beban Operasional Lainnya	(29,425,756)	(214,693)	(384,511)	(917,817)	86,421	(30,856,356)	*Other Operating Expenses*
Laba Operasional	23,923,712	130,201	128,701	596,892	(383,882)	24,395,624	*Operating Income*
Pendapatan/(Beban) Bukan Operasional - Bersih	2,079	(654)	-	1,872	(1,458)	1,839	*Non Operating Income/ (Expenses) - Net*
Laba Sebelum Beban Pajak	23,925,791	129,547	128,701	598,764	(385,340)	24,397,463	*Income Before Tax Expense*
Beban Pajak						(4,286,423)	*Tax Expense*
Laba Bersih						20,111,040	*Net Income*
Total aset	1,248,299,477	22,396,679	17,625,490	81,730,697	(7,997,612)	1,362,054,731	*Total assets*
Total liabilitas	1,066,682,098	22,498,964	17,727,517	82,036,757	(3,229,973)	1,185,715,363	*Total liabilities*

	2024						
	Indonesia	**New York**	**Eropa/ *Europe***	**Asia**	**Penyesuaian dan eliminasi/ *Adjustment and elimination***	**Konsolidasian /*Consolidated***	
Pendapatan Bunga - Bersih	39,082,359	310,656	131,855	953,360	1,975	40,480,205	*Interest Income - Net*
Pendapatan Premi - Bersih	(1,752)	-	-	-	(52)	(1,804)	*Premium Income - Net*
Pendapatan Asuransi dan Hasil Investasi- Bersih	768,096	-	-	-	-	768,096	*Premium Income and Invesment Return - Net*
Pendapatan Operasional lainnya	22,103,432	55,224	205,713	490,310	(205,500)	22,649,179	*Other Operating Income*
(Pembentukan)/pemulihan Cadangan Kerugian Penurunan Nilai	(8,045,756)	14,741	39,908	(219,455)	-	(8,210,562)	*(Allowance)/ Reversal For Impairment Losses*
Beban Operasional Lainnya	(28,096,802)	(198,415)	(229,741)	(686,550)	99,282	(29,112,226)	*Other Operating Expenses*
Laba Operasional	25,809,577	182,206	147,735	537,665	(104,295)	26,572,888	*Operating Income*
Pendapatan/(Beban) Bukan Operasional - Bersih	(16,543)	9,611	(18)	4,482	(1,329)	(3,797)	*Non Operating Income/ (Expenses) - Net*
Laba Sebelum Beban Pajak	25,793,034	191,817	147,717	542,147	(105,624)	26,569,091	*Income Before Tax Expense*
Beban Pajak						(4,899,694)	*Tax Expense*
Laba Bersih						21,669,397	*Net Income*
Total aset	1,022,767,403	21,338,584	15,819,954	77,875,767	(7,672,846)	1,130,128,862	*Total assets*
Total liabilitas	850,828,615	21,495,924	15,985,094	78,375,360	(3,104,138)	963,580,855	*Total liabilities*

48. MANAJEMEN RISIKO

Untuk mengantisipasi tantangan ekonomi domestik maupun global serta peningkatan eksposur risiko yang dihadapi oleh BNI, dibutuhkan suatu sistem pengelolaan risiko dan permodalan yang efektif dan terintegrasi yang mampu mendukung pencapaian dan pertumbuhan kinerja secara berkelanjutan sekaligus meningkatkan daya saing Bank.

Risiko adalah potensi kerugian akibat terjadinya suatu peristiwa tertentu. Risiko dalam konteks perbankan merupakan suatu kejadian potensial, baik yang diperkirakan (*expected*) maupun yang tidak diperkirakan (*unexpected*) yang berdampak negatif terhadap pendapatan dan permodalan Bank.

Manajemen risiko merupakan serangkaian metodologi dan prosedur yang digunakan untuk mengidentifikasi, mengukur, memantau, dan mengendalikan risiko yang timbul dari seluruh kegiatan usaha Bank, termasuk upaya untuk memitigasi dan/atau meminimalkan kerugian finansial maupun non-finansial yang mungkin timbul dari produk atau aktivitas Bank, hubungan antara Bank dengan nasabah maupun dalam internal Bank.

Informasi tambahan manajemen risiko yang merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia diungkapkan pada Catatan 61l.

Penerapan Manajemen Risiko didasari oleh kebutuhan akan keseimbangan fungsi bisnis dengan pengelolaan risiko, dimana Manajemen Risiko menjadi *strategic partner* dari Unit Bisnis untuk mengoptimalkan pendapatan dari Unit Bisnis secara keseluruhan.

Dalam rangka penerapan Manajemen Risiko yang efektif, baik untuk BNI secara individu maupun secara Konsolidasi dan Terintegrasi dengan Entitas Anak, penerapan manajemen risiko dilakukan melalui 4 (empat) pilar penerapan manajemen risiko yaitu: (i) Pengawasan aktif Direksi dan Dewan Komisaris; (ii) Kecukupan kebijakan, dan prosedur manajemen risiko serta penetapan limit risiko; (iii) Kecukupan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko serta Sistem Informasi Manajemen Risiko; dan (iv) Sistem pengendalian internal yang menyeluruh.

Penerapan manajemen risiko di BNI secara umum terangkum dalam kerangka manajemen risiko. Kerangka manajemen risiko ini dituangkan dalam kebijakan, prosedur, limit-limit transaksi, kewenangan dan ketentuan lain serta diaplikasikan dalam perangkat manajemen risiko, yang berlaku di seluruh lingkup aktivitas usaha.

48. RISK MANAGEMENT

To anticipate domestic and global economic challenges and also increasing risk exposures faced by BNI, an effective and integrated risk and capital management system is needed, which is able to support the achievement and growth of sustainable performance while enhancing the competitiveness of the Bank.

Risk is the potential loss due to certain events. Risk in the banking context is a potential event, either an expected or an unexpected that has a negative impact on bank income and capital of the Bank.

Risk management is a set of methodologies and procedures used to identify, measure, monitor, and control the risks arising from the entire Bank's business activities, including the efforts to mitigate and/or minimise financial or non-financial losses that may arise from products or activities of the Bank, the relationship between the Bank and its customer and also within the internal Bank.

The additional risk management information that is required by regulations and/or additional disclosure prepared by the Group, and is not required by Indonesian Financial Accounting Standards is disclosed in Note 61l.

The Risk Management implementation is based on the need to maintain balance between the business functions with the risk management, where Risk Management becoming a strategic partner for the Business Unit to optimise the revenue from the Business Unit as a whole.

In order to implement effective Risk Management, both for BNI individually and as a Consolidated and Integrated subsidiaries, the application of risk management is done through 4 (four) pillars of risk management: (i) Active control from Board of Directors and Board of Commissioners; (ii) The adequacy of policies and risk management procedures and, i.e. risk limit determination; (iii) The adequacy of identification process, measurement, monitoring, and risk control and Risk Management Information Systems; and (iv) Overall internal control systems.

Implementation of risk management in BNI is undertaken within the risk management framework. This risk management framework is outlined in the policies, procedures, transaction limits, authorities and other regulations as well as being applied in the risk management tools, which is applicable in the whole scope of business activities.

48. MANAJEMEN RISIKO (lanjutan)

Secara berkala dilakukan evaluasi terhadap kebijakan dan prosedur manajemen risiko agar sesuai dengan perkembangan bisnis Bank dan perubahan regulasi.

Terkait dengan produk atau aktivitas baru yang akan diterbitkan, penilaian yang komprehensif dilakukan terhadap risiko yang melekat pada produk atau aktivitas baru untuk memastikan bahwa potensi risiko yang mungkin timbul telah dimitigasi dengan baik.

Pengelolaan risiko kredit, risiko likuiditas, risiko pasar dan operasional BNI sebagaimana diuraikan pada Catatan 49 sampai dengan Catatan 52 adalah sesuai dengan definisi dari Regulator (tidak diaudit).

***48. RISK MANAGEMENT** (continued)*

Periodic evaluation is applied to risk management policies and procedures to ensure it reflects the Bank's current business and regulations.

Related to new product or activity, a comprehensive assessment for each of inherent risk in those new product or activity is done to ensure the potential risk that may occur is mitigated.

The management of BNI's credit, liquidity, market and operational risks, as described in Notes 49 to 52 are consistent with Regulator's definition (unaudited).

49. RISIKO KREDIT

Pengelolaan kredit Bank diarahkan untuk melakukan ekspansi kredit dan mengelola kualitas setiap kredit sejak saat diberikan sampai dengan dilunasi oleh debitur dan untuk mencegah kredit tersebut menjadi kredit bermasalah (*Non-Performing Loan/NPL)*. Pengelolaan kredit yang efektif dapat meminimalkan kerugian dan mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

Pengelolaan risiko kredit BNI selain bertujuan untuk memenuhi persyaratan yang ditetapkan oleh Regulator, juga untuk meminimalkan kemungkinan kerugian yang timbul akibat debitur gagal memenuhi kewajibannya atas fasilitas kredit yang diberikan dan kontrak keuangan lainnya, baik pada tingkat individu debitur maupun portofolio kredit secara keseluruhan.

BNI telah memiliki kebijakan dan prosedur perkreditan serta kebijakan manajemen risiko kredit yang diputuskan melalui forum Komite Kebijakan Perkreditan (KKP), Komite Prosedur Perkreditan (KPP), Komite Manajemen Risiko dan *Anti Fraud* sub Komite Manajemen Risiko (KRA-RMC) yang beranggotakan Direksi dan beberapa anggota manajemen senior serta Rapat Direksi (Radisi) serta disetujui oleh Dewan Komisaris. Kebijakan Perkreditan Bank disetujui oleh Dewan Komisaris dan ditinjau paling lama setiap 3 (tiga) tahun sekali. Selanjutnya kebijakan dan prosedur tersebut dituangkan dalam Pedoman Perusahaan (PP) Perkreditan dan Pedoman Perusahaan Manajemen Risiko Kredit.

Pedoman Perusahaan (PP) Perkreditan memberikan pedoman secara lengkap dan terperinci atas kegiatan manajemen kredit dari saat pengajuan kredit, proses analisis, persetujuan, pemantauan, pendokumentasian, pengendalian, penyelamatan/restrukturisasi dan penyelesaian kredit bermasalah, sehingga kualitas kredit dapat terjaga dengan tetap memperhatikan target bisnis yang ditetapkan (tidak diaudit).

49. CREDIT RISK

The Bank's loan management is aimed to support the loan expansion and to manage the quality of each loan from the time the loan was granted until the loan is fully repaid by the debtors and to prevent the loan becoming a Non-Performing Loan (NPL). Effective loan management is intended to minimise the risk of losses and optimise the use of capital allocated for credit risk.

The purpose of BNI's credit risk management other than to comply with Regulatory requirement is to minimise the possible losses resulting from the debtors' failure to pay credit facility and other financial contracts at the minimum level, both on the individual and loan portfolio level.

BNI already has loan policies and procedures for credit and credit risk management that was decided in the Credit Policy Committee (KKP), Credit Procedures Committee (KPP), Risks Management and Anti Fraud Committee sub Committee of Risk Management (KRA-RMC) consisting of Board of Directors and several members of senior management and also Board of Directors meetings and approved by Board of Commissioner. Bank Credit Policies is approved by Board of Commissioner and reviewed at least once in 3 (three) years. These policies and procedures are written in the Credit Company Guidelines (PP) and Credit Risk Management Company Guidelines.

These Credit Company Guidelines (PP) provide complete and detailed guidance on loan management activities from loan proposal, analysis process, approval, monitoring, documentation, controls, restructuring and the settlements of non-performing loans, so that credit quality can be maintained by taking into account the business targets set (unaudited).

49. RISIKO KREDIT (lanjutan)

Dalam rangka mendukung proses pemberian kredit yang lebih hati-hati, BNI melakukan penelaahan dan penyempurnaan kebijakan perkreditan dan kebijakan manajemen risiko kredit secara periodik sesuai dengan perkembangan bisnis terkini.

Pengelolaan risiko kredit diterapkan pada tingkat individu dan tingkat portofolio. Pada tingkat individu pinjaman untuk kredit produktif, setiap usulan pemberian kredit dilakukan melalui proses analisis kredit oleh Unit Bisnis dan ditinjau oleh unit risiko kredit. Mekanisme proses persetujuan kredit dilakukan melalui rapat Komite Kredit. Komite Kredit merupakan lembaga pemutus kredit yang beranggotakan pemutus dari Unit Bisnis dan Unit Risiko Bisnis, dengan demikian proses pemberian kredit menjadi lebih komprehensif dan hati-hati.

Untuk mempercepat proses ekspansi bisnis segmen kecil, fungsi pemasaran dan proses analisa kredit dilakukan oleh *Relationship Manager* yang berada di bawah Unit Bisnis yaitu dengan melakukan analisa bisnis dan analisa risiko serta memberikan mitigasi risiko yang diperlukan terhadap calon debitur yang diusulkan.

Adapun untuk segmen menengah dan korporasi dilakukan oleh *Relationship Manager* dan *Business Analyst* yang berada di Unit Bisnis dengan tugas memproses usulan dari calon debitur, sementara analisis dan *review* risiko calon debitur di segmen Korporasi dan Menengah dilakukan oleh fungsi *Credit Risk Manager* yang berada di bawah Unit Risiko.

Penerapan *four eyes principles* dalam proses perkreditan di BNI diimplementasikan dalam proses persetujuan kredit yang dilakukan melalui Komite Kredit, yaitu forum bersama pejabat pemutus kredit yang mempunyai wewenang memutus kredit yang diusulkan sesuai dengan limit yang ditetapkan. Anggota Komite Kredit terdiri dari pejabat unit bisnis dan unit risiko bisnis. Dengan demikian proses pemberian kredit menjadi lebih komprehensif dan hati-hati.

Unit bisnis dan unit risiko bisnis berperan sebagai *first line of defense (risk owner)* yang bertugas mengelola dan mengendalikan risiko kredit pada kegiatan operasional harian unit tersebut.

Proses analisis dan persetujuan kredit dilakukan melalui serangkaian proses penilaian tingkat risiko kredit calon debitur, yang diantaranya dengan menggunakan *internal rating system* (untuk kredit produktif) dan *credit scoring* pada *decision engine iDEAS* yang telah terintegrasi dengan *Loan Origination System* (untuk kredit konsumtif dan kredit produktif segmen ritel sampai dengan Rp5 miliar), sekaligus juga strategi mitigasi risikonya. Hasil proses analisis dan penilaian tingkat risiko kredit kemudian diajukan kepada Komite Kredit untuk mendapatkan persetujuan.

***49. CREDIT RISK** (continued)*

To support a prudent loan granting process, BNI conducts periodic reviews and enhances its loan and credit risk management policies in line with current business developments.

Credit risk management is implemented both at the individual and portfolio level. At the individual level, for productive loans, each loan granting proposal is made through a process of analysis by the Business Unit and reviewed by the credit risk unit. The credit approval process mechanism is through a Credit Committee meeting. The Credit Committee constitutes the decision maker for credit approval, which consists of representatives from Business Units and the Credit Risk Unit, so that the loan granting process becomes more comprehensive and prudent.

To accelerate the process of business expansion in small segment, the marketing and credit analysis process function is performed by the Relationship Manager under the Business Unit by conducting business analysis and risk analysis as well as providing risk mitigation against the proposed debtor candidates.

As for the middle and corporate segment these are performed by Relationship Managers and Business Analyst who are in the Business Unit and have the task of processing the proposals from prospective debtors, while the analysis and risk review of prospective debtors in the Corporate and Middle segment are performed by Credit Risk Manager who is under the Risk Unit.

The application of four eyes principles in the lending process at BNI is implemented in the credit approval process through Credit Committees, that is a forum of credit decision makers who have the authority to approve the credit in accordance with the specified limit. The members of the Credit Committee consist of business unit officers and business risk unit officers. Thus the process of granting credit becomes more comprehensive and prudent.

Business units and business risk units act as first line of defense (risk owner) in charge of managing and controlling credit risk in daily operations of the unit.

Loan analysis and approval process is conducted through several assessment processes of the applicant's credit risks, i.e. through internal rating system (for productive loans) and credit scoring on the iDEAS decision engine which has been integrated with Loan Origination System (for consumer loans and productive retail loans up to Rp5 billion), followed by the related risk mitigation strategy. The results of the credit analysis and risk assessment process will be forwarded to the Credit Committee for approval.

49. RISIKO KREDIT (lanjutan)

Kredit yang bermasalah dikelola oleh Divisi *Corporate Remedial & Recovery* untuk segmen Korporasi, Divisi *Enterprise & Commercial Remedial & Recovery* untuk segmen *Enterprise*, Komersial dan Ritel produktif serta Divisi *Retail Collection & Recovery* untuk segmen Konsumer dan Program, agar penyelamatan/penyelesaian kredit dapat dilakukan secara lebih baik dan memampukan Unit Bisnis untuk dapat fokus pada pengelolaan debitur lancar dan melakukan ekspansi kredit.

Untuk menjaga agar portofolio Bank tidak terkonsentrasi pada debitur dan sektor ekonomi tertentu, maka telah ditetapkan pembatasan kredit sesuai *risk appetite*. Sedangkan untuk mengantisipasi pelampauan BMPK, BNI telah menetapkan limit BMPK yang disebut *house limit* dengan batas yang lebih *prudent* dibandingkan limit BMPK sesuai ketentuan regulator.

Untuk mengatur komposisi portofolio pinjaman BNI, setiap tahun sekali ditetapkan batas maksimum pinjaman (*Loan Exposure Limit*) yang bertujuan untuk mendiversifikasi portofolio pinjaman berdasarkan sektor industri dan sub-sektor industri untuk mengoptimalkan pendapatan dengan mempertimbangkan risiko di masing-masing sektor industri serta mengurangi risiko konsentrasi. Dalam penentuan konsentrasi tiap sektor industri yang optimal, Bank mengembangkan metode *Credit Portfolio Optimisation* (CPO) dengan memperhitungkan korelasi *risk-return* dari tiap sektor industri. Selanjutnya Bank memonitor status kelonggaran ekspansi pinjaman (*space available*) secara periodik berdasarkan *Loan Exposure Limit* (LEL).

Pengembangan manajemen risiko kredit dilakukan secara bertahap sesuai dengan kerangka kerja yang ditetapkan Otoritas Jasa Keuangan. Sejak 1 Januari 2023, BNI telah mengimplementasikan perhitungan ATMR Risiko Kredit dengan pendekatan Standar sesuai SEOJK No.24/SEOJK.03/2021 tentang Perhitungan Aset Tertimbang Menurut Risiko Untuk Risiko Kredit Dengan Menggunakan Pendekatan Standar Bagi Bank Umum (tidak diaudit).

Sebagai bagian dari pengukuran risiko kredit dan untuk mengantisipasi terjadinya perubahan faktor makro yang berpengaruh pada Bank, BNI secara berkala melakukan *stress testing* risiko kredit untuk menilai perubahan portofolio kredit dan pengaruhnya bagi Bank serta kemampuan Bank menghadapi kondisi tersebut.

***49. CREDIT RISK** (continued)*

Non-performing loan is managed by Corporate Remedial & Recovery Division for corporate segment, Enterprise & Commercial Remedial & Recovery Division for Enterprise, Commercial & productive Retail and Retail Collection & Recovery Division for Consumer and Program segment, to ensure better credit recovery and settlement, and to enable the Business Unit to focus on the management of performing debtors and loan expansion.

To prevent the Bank portfolio from being concentrated to certain debtors and economic sectors, credit restrictions have been set according to the risk appetite, while to anticipate exceeding the Legal Lending Limit, BNI has set limits on the Legal Lending Limit called House Limit with a more prudent limit than the limit of Maximum Credit Granting in accordance with the provisions of the regulator.

To manage the composition of BNI loan portfolio, the loan exposure limit is determined annually to diversify loan portfolio among different industry sectors and industry sub-sector in order to optimise return considering risk in each sector and to reduce concentration risk. In the determination of optimal concentration in industry sectors, the Bank has developed a method of Credit Portfolio Optimisation (CPO) by calculating the correlation of risk return from each industry sectors. Furthermore, the Bank monitors the status of the space available based on Loan Exposure Limit (LEL) periodically.

The development of credit risk management is conducted in stages, and in line with the framework set by Financial Service Authority. As of 1 January 2023, BNI has implemented the calculation of Credit Risk Weighted Assets using the standard approach according to SEOJK No.24/SEOJK.03/2021 concerning Calculation of Risk Weighted Assets for Credit Risk Using a Standard Approach for Commercial Banks (unaudited).

As part of the measurement of credit risk and to anticipate the occurrence of macro-factors changes affecting the Bank, BNI periodically performs stress testing of credit risk to assess changes in loan portfolio and its impact to the Bank and the Bank's ability to face such condition.

49. RISIKO KREDIT (lanjutan)

(i) Eksposur maksimum risiko kredit

Eksposur risiko kredit terhadap aset-bersih sesudah cadangan kerugian penurunan nilai pada laporan posisi keuangan konsolidasian pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

***49. CREDIT RISK** (continued)*

(i) Maximum exposure of the credit risk

Credit risk exposures relating to the assets-net of allowance for impairment losses on the consolidated statement of financial position as of 31 December 2025 and 2024 are as follows:

Keterangan	Eksposur maksimum/ *Maximum exposure* 2025	2024	*Description*
Giro pada Bank Indonesia	79,989,122	51,669,054	*Current accounts with Bank Indonesia*
Giro pada bank lain	25,938,086	22,074,173	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	33,779,915	17,075,441	*Placements with other banks and Bank Indonesia*
Efek-efek			*Marketable securities*
- Nilai wajar melalui laporan laba rugi	31,800,444	23,959,614	*Fair value through profit or loss -*
- Nilai wajar melalui penghasilan komprehensif lain	31,142,476	24,181,607	*Fair value through other - comprehensive income*
- Biaya perolehan diamortisasi	66,665	387,017	*Amortised cost -*
Efek-efek yang dibeli dengan janji dijual kembali	6,910,606	7,971,923	*Securities purchased under agreement to resell*
Wesel ekspor dan tagihan lainnya	13,452,846	13,243,026	*Bills and other receivables*
Tagihan akseptasi	19,448,760	15,925,521	*Acceptance receivables*
Pinjaman yang diberikan	863,670,065	737,187,258	*Loans*
Obligasi Pemerintah			*Government Bonds*
- Nilai wajar melalui laba rugi	5,594,298	3,957,073	*Fair value through profit or loss -*
- Nilai wajar melalui penghasilan komprehensif lain	123,033,402	90,900,188	*Fair value through other - comprehensive income*
- Biaya perolehan diamortisasi	34,878,671	37,207,067	*Amortised cost -*
Aset lain-lain - bersih*)	14,085,344	9,165,973	*Other assets - net*)*
	1,283,790,700	**1,054,904,935**	

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain dan piutang nasabah - Entitas Anak.

*) *Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and receivables from customers - Subsidiary.*

Eksposur risiko kredit terhadap rekening administratif konsolidasian pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

Credit risk exposures relating to consolidated administrative accounts items as of 31 December 2025 and 2024 are as follows:

Keterangan	Eksposur maksimum/ *Maximum exposure* 2025	2024	*Description*
Fasilitas kredit kepada debitur yang belum digunakan	93,616,400	57,552,807	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	11,086,951	9,952,660	*Outstanding irrevocable letters of credit*
Garansi yang diterbitkan	106,625,964	73,450,980	*Guarantees issued*
	211,329,315	**140,956,447**	

49. RISIKO KREDIT (lanjutan)

(i) Eksposur maksimum risiko kredit (lanjutan)

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Grup pada tanggal 31 Desember 2025 dan 2024. Untuk aset pada laporan posisi keuangan konsolidasian, eksposur di atas ditentukan berdasarkan nilai tercatat bersih seperti yang diungkapkan pada laporan posisi keuangan konsolidasian.

Pada tanggal 31 Desember 2025 dan 2024, masing-masing sebesar 67,27% dan 69,88% adalah jumlah eksposur risiko kredit maksimum terhadap aset pada laporan posisi keuangan konsolidasian yang berasal dari pinjaman yang diberikan.

Manajemen yakin akan kemampuan Bank untuk mengendalikan dan memelihara eksposur risiko kredit yang berasal dari kredit yang diberikan, berdasarkan hal-hal sebagai berikut:

- Proses peningkatan pengelolaan kredit secara berkelanjutan melalui penyempurnaan *end to end credit process*, pengembangan produk, penyempurnaan organisasi perkreditan, peningkatan kemampuan SDM di bidang perkreditan dan pengembangan perangkat kredit berbasis teknologi.
- BNI telah memiliki pedoman tertulis mengenai kebijakan dan proses kredit yang mencakup seluruh aspek pemberian kredit yang dilakukan. Setiap pemberian kredit harus senantiasa mengacu pada kebijakan tersebut.
- BNI telah menetapkan *risk appetite* dan *risk tolerance* yang selaras dengan sasaran strategis Bank, yang digunakan sebagai acuan tingkat risiko yang akan diambil Bank dalam pencapaian sasaran bisnis.
- BNI telah melakukan *stress test* risiko kredit untuk menilai kemampuan Bank bertahan dalam kondisi tidak normal serta sebagai alat untuk pengambilan keputusan Bank.
- BNI telah memiliki sistem deteksi dini permasalahan melalui "*early warning system*" dan pemantauan yang disiplin.
- Seluruh kredit diberikan dengan agunan kecuali untuk jenis kredit tertentu seperti kartu kredit, *personal loans* dan fasilitas antar bank.

***49. CREDIT RISK** (continued)*

(i) Maximum exposure of the credit risk (continued)

The table above represents credit risk exposures of the Group as of 31 December 2025 and 2024. For assets on the consolidated statement of financial position, the exposures set out above are based on net carrying value as reported in the consolidated statement of financial position.

As of 31 December 2025 and 2024, the total maximum credit risk exposure toward asset in the consolidated statement of financial position from loans is 67.27% and 69.88%, respectively.

Management is confident in its ability to control and sustain exposure of credit risk to the Bank resulting from its loans based on the following:

- *The process of improving credit management in a sustainable manner by improving end to end credit process, product development, credit organization improvement, credit capability improvement of human resources and development of technology based for credit application.*
- *BNI has documented credit policies and manual procedures that cover all aspects of the Bank's lending activities. Each loan transaction must adhere to the requirements of the Bank's policy.*
- *BNI has set risk appetite and risk tolerance in accordance with the Bank's strategic objectives, which are used as a reference level of risk to be taken by the Bank in achieving business goals.*
- *BNI has performed stress test on credit risk to assess the ability of the Bank to stay in the abnormal condition and as an instrument for decision making for the Bank.*
- *BNI has an early problem detection system through "early warning system" and disciplined monitoring.*
- *All loans are secured by collaterals, except for certain loans such as credit cards, personal loans and interbank loans.*

49. RISIKO KREDIT (lanjutan)

(ii) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya

BNI menentukan struktur kredit termasuk penentuan *covenant* yang tepat sesuai kebutuhan dan kondisi debitur, sehingga kredit yang diberikan benar-benar efektif dan menguntungkan bagi debitur maupun Bank. Jenis agunan yang yang dimiliki oleh Bank adalah kas, deposito, agunan yang diikat dengan hipotek dan hak tanggungan, garansi/ penjaminan pihak ketiga (termasuk penjaminan kredit oleh perusahaan asuransi) serta jaminan dalam bentuk aset lainnya. Perkiraan nilai wajar dari agunan yang digunakan oleh Bank didasarkan pada nilai agunan yang dinilai oleh penilai internal maupun eksternal.

Ketentuan *coverage* atau kecukupan agunan untuk tiap segmen ditentukan sebagai berikut: (tidak diaudit)

***49. CREDIT RISK** (continued)*

(ii) Analysis of maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation

BNI sets loan structure for every debtor through appropriate covenants that aligns with debtor needs and condition. This is to ensure the debtor uses the loan according to its original purpose so that the Bank and the debtor's interests are fulfilled. Collateral types held by the Bank are cash, deposits, registered mortgages, guarantees and other registered securities over assets. Estimates of fair value of collaterals held by the Bank is based on the value of collaterals assessed internally or externally by the independent appraisers.

The collateral coverage criteria for each segment is divided as follows: (unaudited)

Segmen/*Segment*	Jenis Agunan/*Collateral*	Jumlah *Coverage* Minimal / *Minimum Coverage Amount*
Korporasi/ *Wholesale*	Aset tetap/*Fixed Asset*	100% dari limit kredit/*from credit limit*
	Kas/*Cash*	
	Standby letter of credit ("SBLC")	
	Tanah dan Bangunan/*Land and Building*	
	Piutang/*Receivable*	
	Kendaraan/*Vehicle*	
	Agunan lain yang diterima oleh Bank/*Other collaterals held by the Bank*	
Menengah/ *Middle*	Aset tetap/*Fixed Asset*	125% dari limit kredit/*from credit limit*
	Kas/*Cash*	
	SBLC	
	Tanah dan Bangunan/*Land and Building*	
	Piutang/*Receivable*	
	Kendaraan/*Vehicle*	
	Agunan lain yang diterima oleh Bank/*Other collaterals held by the Bank*	
Kecil/*Retail*	Aset tetap/*Fixed Asset*	110% dari limit kredit/*from credit limit*
	Kas/*Cash*	
	SBLC	

Nilai tercatat dari aset keuangan bank selain kredit yang diberikan dan efek-efek yang dibeli dengan janji dijual kembali pada umumnya menggambarkan eksposur maksimum atas risiko kredit.

The carrying amounts of financial assets other than bank loans and securities purchased under agreements to resell is generally equal to the maximum exposure of credit risk.

49. RISIKO KREDIT (lanjutan)

(ii) Analisa eksposur maksimum terhadap risiko kredit setelah memperhitungkan dampak agunan dan mitigasi risiko kredit lainnya (lanjutan)

Tabel di bawah ini menunjukkan eksposur maksimum bersih atas risiko kredit untuk efek-efek yang dibeli dengan janji dijual kembali pada tanggal-tanggal 31 Desember 2025 dan 2024:

***49. CREDIT RISK** (continued)*

(ii) Analysis of maximum exposure to credit risk after taking into account the impact of collateral and other credit risk mitigation. (continued)

The table below shows the net maximum exposure to credit risk on securities purchased under agreements to resell on 31 December 2025 and 2024:

	2025			
Keterangan	**Eksposur maksimum/ *Maximum exposure***	**Agunan/ *Collateral***	**Eksposur Bersih/ *Net Exposure***	***Description***
Efek-efek yang dibeli dengan janji dijual kembali	6,910,606	7,121,131	(210,525)	*Securities purchased under agreements to resell*

	2024			
Keterangan	**Eksposur maksimum/ *Maximum exposure***	**Agunan/ *Collateral***	**Eksposur Neto/ *Net Exposure***	***Description***
Efek-efek yang dibeli dengan janji dijual kembali	7,971,923	8,226,650	(254,727)	*Securities purchased under agreements to resell*

(iii) Informasi kualitas kredit atas aset keuangan per tanggal 31 Desember 2025 dan 2024 sebagai berikut:

(iii) The information on the credit quality of financial assets as of 31 December 2025 and 2024 are as follows:

	2025								
	Belum jatuh tempo atau tidak mengalami penurunan nilai/ *Neither past due nor impaired*					**Jatuh tempo dan tidak mengalami penurunan nilai/ *Past-due but not impaired***	**Mengalami penurunan nilai/ *Impaired***	**Total**	
	Grup 1/ *Group 1*	**Grup 2/ *Group 2***	**Grup 3/ *Group 3***	**Grup 4/ *Group 4***	**Grup 5/ *Group 5***				
Giro pada Bank Indonesia	-	79,989,122	-	-	-	-	-	79,989,122	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	25,938,093	-	-	-	-	-	25,938,093	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	13,698,065	20,081,928	-	-	-	-	-	33,779,993	*Placements with other banks and Bank Indonesia*
Efek-efek	33,491,970	29,279,157	-	-	-	-	245,568	63,016,695	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	2,079,352	4,831,254	-	-	-	-	-	6,910,606	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	5,089,698	8,431,110	-	-	-	-	-	13,520,808	*Bills and other receivables*
Tagihan akseptasi	579,501	14,770,974	3,880,402	-	336,101	15,768	-	19,582,746	*Acceptance receivables*
Pinjaman yang diberikan									*Loans*
Modal kerja	89,796,767	328,536,154	7,461,873	128,703	25,433,350	12,731,685	9,865,104	473,953,636	*Working capital*
Investasi	13,526,256	136,111,079	8,034,452	82,316	4,806,649	1,824,153	3,134,033	167,518,938	*Investment*
Konsumen	12,929,733	123,887,599	10,135,030	772,543	2,496,332	3,503,276	4,328,319	158,052,832	*Consumer*
Sindikasi	636,493	89,240,248	88	-	2,876,206	4,844,185	-	97,597,220	*Syndicated*
Karyawan	1,321	2,241,072	97,954	9,310	2,612	8,366	45,128	2,405,763	*Employee*
Program Pemerintah	-	2,231	-	-	-	71	-	2,302	*Government programs*
Obligasi Pemerintah	34,866,841	128,646,060	-	-	-	-	-	163,512,901	*Government Bonds*
Aset lain-lain – bersih*)	-	14,085,344	-	-	-	-	-	14,085,344	*Other assets – net*)
Total	**206,695,997**	**1,006,071,425**	**29,609,799**	**992,872**	**35,951,250**	**22,927,504**	**17,618,152**	**1,319,866,999**	***Total***
Cadangan kerugian penurunan nilai								(36,065,149)	*Allowance for impairment losses*
Bersih								**1,283,801,850**	***Net***

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM, piutang lain-lain dan kartu kredit dan piutang nasabah - Entitas anak.

*) *Other assets – net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and receivables from customers - Subsidiary.*

49. RISIKO KREDIT (lanjutan)

(iii) Informasi kualitas kredit atas aset keuangan per tanggal 31 Desember 2025 dan 2024 sebagai berikut: (lanjutan)

***49. CREDIT RISK** (continued)*

(iii) The information on the credit quality of financial assets as of 31 December 2025 and 2024 are as follows: (continued)

	2024								
	Belum jatuh tempo atau tidak mengalami penurunan nilai/ *Neither past due nor impaired*					Jatuh tempo dan tidak mengalami penurunan nilai/ *Past-due but not impaired*	Mengalami penurunan nilai/ *Impaired*	Total	
	Grup 1/ *Group 1*	Grup 2/ *Group 2*	Grup 3/ *Group 3*	Grup 4/ *Group 4*	Grup 5/ *Group 5*				
Giro pada Bank Indonesia	-	51,669,054	-	-	-	-	-	51,669,054	*Current accounts with Bank Indonesia*
Giro pada bank lain	-	22,074,186	-	-	-	-	-	22,074,186	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	3,439,474	13,636,161	-	-	-	-	-	17,075,635	*Placements with other banks and Bank Indonesia*
Efek-efek	23,030,204	25,187,153	-	-	-	-	316,989	48,534,346	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	7,281,260	690,663	-	-	-	-	-	7,971,923	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	4,216,205	9,079,649	-	-	-	-	-	13,295,854	*Bills and other receivables*
Tagihan akseptasi	147,257	10,682,441	3,815,368	-	1,321,400	52,304	-	16,018,770	*Acceptance receivables*
Pinjaman yang diberikan									*Loans*
Modal kerja	24,151,410	313,967,462	9,949,258	135,707	23,209,245	18,612,263	9,745,230	399,770,575	*Working capital*
Investasi	6,695,321	108,089,121	4,522,200	30,826	6,926,294	2,764,903	2,594,234	131,622,899	*Investment*
Konsumen	15,313,455	110,549,579	9,333,575	668,108	2,467,561	3,261,194	2,866,799	144,460,271	*Consumer*
Sindikasi	811,737	89,539,671	136,379	-	1,700,791	4,912,686	19,846	97,121,110	*Syndicated*
Karyawan	7,840	2,726,811	105,998	10,944	1,091	14,892	26,695	2,894,271	*Employee*
Program Pemerintah	-	2,652	-	-	-	-	-	2,652	*Government programs*
Obligasi Pemerintah	7,948,761	124,122,808	-	-	-	-	-	132,071,569	*Government Bonds*
Aset lain-lain – bersih*)	-	9,165,973	-	-	-	-	-	9,165,973	*Other assets – net*)
Total	**93,042,924**	**891,183,384**	**27,862,778**	**845,585**	**35,626,382**	**29,618,242**	**15,569,793**	**1,093,749,088**	***Total***
Cadangan kerugian penurunan nilai								(38,834,065)	*Allowance for impairment losses*
Bersih								**1,054,915,023**	***Net***

*) Aset lain-lain – bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit dan piutang lain-lain.

*) *Other assets – net consist of interest receivables, receivables from transactions related to ATM and credit card and other receivables.*

Pengelompokkan kualitas kredit atas aset keuangan berdasarkan kebijakan internal Grup adalah sebagai berikut:

- **Grup 1**: Debitur baru (kurang dari 6 bulan).
- **Grup 2**: Nasabah lama yang tidak memiliki historis pernah menunggak dalam 3 tahun terakhir.
- **Grup 3**: Nasabah lama yang memiliki historis pernah menunggak (dibawah 90 hari) dalam 3 tahun terakhir.
- **Grup 4**: Nasabah lama yang memiliki historis pernah menunggak diatas 90 hari dalam 3 tahun terakhir.
- **Grup 5**: Nasabah lama yang pinjamannya pernah/telah direstrukturisasi.

The credit quality classifications of financial assets based on the Group's internal policies are as follows:

- ***Group 1**: New customers (less than 6 months).*
- ***Group 2**: Existing customers with no history of overdue for the past 3 years.*
- ***Group 3**: Existing customers with history of overdue below 90 days in the past 3 years.*
- ***Group 4**: Existing customers with history of default more than 90 days in the past 3 years.*
- ***Group 5**: Existing customers with loans that was/has been restructured.*

49. RISIKO KREDIT (lanjutan)

***49. CREDIT RISK** (continued)*

(iv) Analisis umur pinjaman yang jatuh tempo tetapi tidak mengalami penurunan nilai pada tanggal 31 Desember 2025 dan 2024:

(iv) The aging analysis of past due but not impaired loans as 31 December 2025 and 2024:

	2025				
	Kurang dari 30 hari/ *Less than 30 days*	**31 sampai 60 hari/ *31 to 60 days***	**Lebih dari 60 hari/ *More than 60 days***	**Total**	
Modal kerja	330,347	161,953	12,239,385	12,731,685	*Working capital*
Investasi	82,918	45,088	1,696,147	1,824,153	*Investment*
Konsumen	142,677	680,186	2,680,413	3,503,276	*Consumer*
Sindikasi	-	-	4,844,185	4,844,185	*Syndicated*
Karyawan	1	-	8,365	8,366	*Employee*
Program Pemerintah	71	-	-	71	*Government programs*
Total	556,014	887,227	21,468,495	22,911,736	***Total***
Cadangan kerugian penurunan nilai	(218,188)	(63,167)	(11,127,858)	(11,409,213)	*Allowance for impairment losses*
Bersih	**337,826**	**824,060**	**10,340,637**	**11,502,523**	***Net***

	2024				
	Kurang dari 30 hari/ *Less than 30 days*	**31 sampai 60 hari/ *31 to 60 days***	**Lebih dari 60 hari/ *More than 60 days***	**Total**	
Modal kerja	432,936	1,522,980	16,656,347	18,612,263	*Working capital*
Investasi	45,311	9,800	2,709,792	2,764,903	*Investment*
Konsumen	150,284	640,029	2,470,881	3,261,194	*Consumer*
Sindikasi	-	-	4,912,686	4,912,686	*Syndicated*
Karyawan	1	-	14,891	14,892	*Employee*
Total	628,532	2,172,809	26,764,597	29,565,938	***Total***
Cadangan kerugian penurunan nilai	(234,532)	(312,537)	(15,886,181)	(16,433,250)	*Allowance for impairment losses*
Bersih	**394,000**	**1,860,272**	**10,878,416**	**13,132,688**	***Net***

(v) Konsentrasi risiko aset keuangan konsolidasian dengan eksposur risiko kredit

Tabel berikut menggambarkan rincian eksposur kredit Grup pada nilai tercatat (tanpa memperhitungkan agunan atau pendukung kredit lainnya), yang dikategorikan berdasarkan area geografis pada tanggal-tanggal 31 Desember 2025 dan 2024. Untuk tabel ini, Grup telah mengalokasikan eksposur area berdasarkan wilayah geografis tempat mereka beroperasi.

(v) Concentration of risks of consolidated financial assets with credit risk exposure

The following table provides details of the Group's credit exposures at their carrying amounts (without taking into account any collateral held or other credit support), as categorised by geographical region as of 31 December 2025 and 2024. For this table, the Group has allocated exposures to the regions based on the geographical area where activities are undertaken.

49. RISIKO KREDIT (lanjutan) / *49. CREDIT RISK (continued)*

(v) Konsentrasi risiko aset keuangan konsolidasian dengan eksposur risiko kredit (lanjutan). / *(v) Concentration of risks of consolidated financial assets with credit risk exposure (continued).*

2025

	Jawa & Bali	Sumatera	Kalimantan	Sulawesi	Indonesia Timur/ *East Indonesia*	Lain-lain *)/ *Others* *)	Total	
Giro pada Bank Indonesia	78,559,909	-	-	-	-	1,429,213	79,989,122	*Current accounts with Bank Indonesia*
Giro pada bank lain	8,622,699	5	10	5	6	17,315,368	25,938,093	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	27,781,708	-	-	-	-	5,998,285	33,779,993	*Placements with other banks and Bank Indonesia*
Efek-efek								*Marketable securities*
Nilai wajar melalui laba rugi	25,451,557	-	-	-	-	6,348,887	31,800,444	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehesif lain	25,169,254	-	-	-	-	5,980,317	31,149,571	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	-	-	-	-	-	66,680	66,680	*Amortised cost*
Efek-efek yang dibeli dengan janji dijual kembali	5,481,513	-	-	-	-	1,429,093	6,910,606	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	13,089,965	19,924	66,058	11,664	-	333,197	13,520,808	*Bill and other receivables*
Tagihan akseptasi	18,415,892	371,978	-	129,808	-	665,068	19,582,746	*Acceptance receivables*
Pinjaman yang diberikan	676,574,407	59,859,036	32,565,578	32,085,935	8,262,755	90,182,980	899,530,691	*Loans*
Obligasi pemerintah								*Government Bonds*
Nilai wajar melalui laba rugi	3,085,578	-	-	-	-	2,508,720	5,594,298	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehensif lain	97,844,669	-	-	-	-	25,192,788	123,037,457	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	24,391,085	-	-	-	-	10,490,061	34,881,146	*Amortised cost*
Aset lain-lain - bersih**)	11,380,123	395,512	48,588	528,106	10,687	1,722,328	14,085,344	*Other assets - net***)
Total	**1,015,848,359**	**60,646,455**	**32,680,234**	**32,755,518**	**8,273,448**	**169,666,985**	**1,319,866,999**	***Total***
Cadangan kerugian penurunan nilai							(36,065,149)	*Allowance for impairment losses*
Neto							**1,283,801,850**	***Net***

2024

	Jawa & Bali	Sumatera	Kalimantan	Sulawesi	Indonesia Timur/ *East Indonesia*	Lain-lain *)/ *Others* *)	Total	
Giro pada Bank Indonesia	50,993,488	-	-	-	-	675,566	51,669,054	*Current accounts with Bank Indonesia*
Giro pada bank lain	8,763,015	5	11	5	6	13,311,144	22,074,186	*Current accounts with other banks*
Penempatan pada bank lain dan Bank Indonesia	9,526,846	-	-	-	-	7,548,789	17,075,635	*Placements with other banks and Bank Indonesia*
Efek-efek								*Marketable securities*
Nilai wajar melalui laba rugi	18,495,795	-	-	-	-	5,463,819	23,959,614	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehesif lain	20,955,867	-	-	-	-	3,231,575	24,187,442	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	300,000	-	-	-	-	87,290	387,290	*Amortised cost*
Efek-efek yang dibeli dengan janji dijual kembali	6,142,073	-	-	-	-	1,829,850	7,971,923	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	13,240,154	18,747	35,783	1,170	-	-	13,295,854	*Bill and other receivables*
Tagihan akseptasi	15,507,287	44,821	4,909	88,752	-	373,001	16,018,770	*Acceptance receivables*
Pinjaman yang diberikan	559,740,206	57,676,921	28,278,891	32,063,331	8,043,697	90,068,732	775,871,778	*Loans*
Obligasi pemerintah								*Government Bonds*
Nilai wajar melalui laba rugi	1,507,795	-	-	-	-	2,449,278	3,957,073	*Fair value through profit or loss*
Nilai wajar melalui penghasilan komprehensif lain	68,548,658	-	-	-	-	22,355,783	90,904,441	*Fair value through other comprehensive income*
Biaya perolehan diamortisasi	26,615,754	-	-	-	-	10,594,301	37,210,055	*Amortised cost*
Aset lain-lain - bersih**)	6,212,530	469,693	40,097	632,808	9,926	1,800,919	9,165,973	*Other assets - net***)
Total	**806,549,468**	**58,210,187**	**28,359,691**	**32,786,066**	**8,053,629**	**159,790,047**	**1,093,749,088**	***Total***
Cadangan kerugian penurunan nilai							(38,834,065)	*Allowance for impairment losses*
Neto							**1,054,915,023**	***Net***

*) Termasuk kantor cabang luar negeri dan Entitas Anak
**) Aset lain-lain – bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain, dan piutang nasabah - Entitas Anak.

*) *Includes overseas branches and Subsidiaries*
**) *Other assets – net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables, and receivables from customers - Subsidiary.*

50. RISIKO LIKUIDITAS

Risiko likuiditas di BNI mencakup potensi ketidakmampuan Bank memenuhi kewajiban jangka pendek baik kepada deposan, investor, kreditur, maupun pemenuhan Giro Wajib Minimum yang dapat dipicu oleh keterbatasan akses pendanaan atau hambatan likuidasi aset pada harga wajar.

Tata kelola risiko likuiditas di BNI dijalankan oleh Divisi *Enterprise Risk Management* (ERM), Divisi *Treasury* (TRS), dan Kantor Luar Negeri, dengan pemisahan tugas dan tanggung jawab yang jelas. Dalam pelaksanaannya, Divisi ERM menyusun kebijakan dan prosedur sebagai panduan pengelolaan risiko likuiditas, sementara Divisi TRS dan Kantor Luar Negeri mengeksekusi strategi likuiditas, termasuk pengelolaan arus kas dan penempatan *buffer* likuid. Sebagai *second line role*, Divisi ERM melakukan pemantauan berkala terhadap pelaksanaan manajemen likuiditas, terutama kepatuhan limit dan sinyal peringatan dini, untuk memastikan kondisi likuiditas tetap terukur dan terkendali.

Divisi ERM menyusun Kebijakan Risiko Likuiditas berupa Pedoman Penerapan Manajemen Risiko Likuiditas, yang lebih lanjut dijabarkan ke dalam Prosedur Manajemen Risiko Likuiditas yang berisi panduan pelaksanaan manajemen risiko likuiditas, antara lain berupa:

a. Ketersediaan Alat Likuid: Kas, GWM, Cadangan Likuiditas, *Early Warning Signal* (EWS) untuk Likuiditas, *Liquidity Contingency Plan Head Office* atau Kantor Luar Negeri;
b. Pengukuran Risiko Likuiditas: Rasio Likuiditas, Proyeksi Arus Kas, Profil Maturitas, Rasio Kecukupan Likuiditas dan *stress testing;*
c. Pemantauan Risiko Likuiditas;
d. Pengendalian Risiko Likuiditas; dan
e. Penetapan Limit Likuiditas: Pagu Kas *bank wide* dan wilayah (Rupiah dan Mata Uang Asing), *safety level*, limit profil maturitas. Pembatasan Kredit mata uang asing berdasarkan ketersediaan likuiditas mata uang asing.

Divisi ERM juga menyusun *risk appetite* dan *risk tolerance* risiko likuiditas yang selaras dengan sasaran strategis Bank, yang digunakan sebagai acuan tingkat risiko yang akan diambil Bank dalam pencapaian sasaran bisnis.

Dalam pengelolaan likuiditas, Bank mengelola kas dan Giro Wajib Minimum sebagai *primary reserve*, cadangan likuiditas sebagai *secondary reserve*, serta *buffer* tambahan sebagai *tertiary reserve* untuk memperkuat ketahanan Bank dalam berbagai kondisi pasar.

50. LIQUIDITY RISK

Liquidity risk in BNI relates to the possibility that the Bank will be unable to meet short-term obligations to depositors, investors and creditors, as well as fulfill Statutory Reserve Requirements due to, among others, limited access to financing or the inability to liquidate assets at reasonable prices.

Liquidity risk governance at BNI is implemented by Enterprise Risk Management (ERM) Division, Treasury (TRS) Division, and Overseas Branches through a clear segregation of roles. ERM Division is responsible for policy and procedural frameworks, while TRS Division and Overseas Branches execute liquidity strategies. As the second line role, ERM Division performs periodic monitoring to ensure compliance with limits and early warning indicators, thereby maintaining liquidity within a controlled range.

ERM Division prepares Liquidity Risk Policy Guidelines in Liquidity Risk Management Implementation Guidelines, which is further elaborated into the Liquidity Risk Management Procedures which contains guidelines for liquidity risk management practices, which include:

a. Availability Liquidity Tools: Cash, Statutory Reserve Requirement, Liquidity Buffer, Early Warning Signal (EWS) for Liquidity, Liquidity Contingency Plan Head Office or Overseas Branches;
b. Measurement of Liquidity Risk: Liquidity Ratio, Cash Flow Projection, Maturity Profile, Liquidity Adequacy Ratio and stress testing;
c. Liquidity Risk Monitoring;
d. Liquidity Risk Management; and
e. Determination of Liquidity Limit: Cash Ceiling bank wide and regional (Rupiah and Foreign Currencies), safety level, maturity profile limit. Credit in foreign currencies Limit based on the availability of liquidity for foreign currencies.

ERM Division also prepares risk appetite and risk tolerance for liquidity risk in accordance with the Bank's strategic objectives, which are used as a reference level of risk to be taken by the Bank in achieving business goals.

In managing liquidity, the Bank maintains cash and statutory reserve requirement as primary reserve, liquidity buffer as secondary reserve, and additional buffers as tertiary reserve to strengthen the Bank's resilience under various market conditions.

50. RISIKO LIKUIDITAS (lanjutan)

Penetapan dan pemantauan limit, yaitu limit Pagu Kas, limit *safety level*, limit profil maturitas, dan pembatasan kredit valas berdasarkan ketersediaan likuiditas valas dilakukan secara berkala oleh Divisi ERM, sedangkan ketersediaan atas keseluruhan *reserve* dipantau secara harian, mingguan, dan bulanan oleh Divisi TRS dan Divisi ERM.

Tabel di bawah ini menunjukkan sisa jatuh tempo kontraktual dari liabilitas keuangan berdasarkan *undiscounted cash flows.*

50. LIQUIDITY RISK (continued)

The setting and monitoring of limits, i.e. cash limit, safety level limit, maturity profile limit and credit limitation for foreign currencies based on the availability of liquidity for foreign currencies is conducted periodically by the ERM Division. While the availability of the whole reserve is monitored daily, weekly, and monthly by the TRS Division and the ERM Division.

The table below shows the remaining contractual maturities of the financial liabilities based on undiscounted cash flows.

2025

	Kurang dari 1 Bulan/ *Less than 1 Month*	1 - 3 Bulan/ *Months*	3 - 6 Bulan/ *Months*	6 - 12 Bulan/ *Months*	Lebih dari 12 Bulan/ *More than 12 Months*	Total	
LIABILITAS							***LIABILITIES***
Liabilitas segera	5,761,037	-	-	-	-	5,761,037	*Obligations due immediately*
Simpanan nasabah	826,153,014	146,951,315	23,385,997	45,184,597	1,686,280	1,043,361,203	*Deposits from customers*
Simpanan dari bank lain	8,484,463	2,332,133	411,758	140,742	236,856	11,605,952	*Deposits from other banks*
Liabilitas derivatif	5,398,899	-	-	-	-	5,398,899	*Derivative payables*
Liabilitas akseptasi	770,953	846,955	641,706	60,267	4,624	2,324,505	*Acceptance payables*
Efek-efek yang diterbitkan	82,688	17,418	320,215	420,319	16,262,805	17,103,445	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	695,605	39,385	131,730	2,704,326	4,110,864	7,681,910	*Securities sold under agreements to repurchase*
Pinjaman yang diterima	3,489,401	3,823,288	3,213,234	2,417,974	33,368,053	46,311,950	*Borrowings*
Efek-efek subordinasi	-	8,708,936	-	215,108	10,865,430	19,789,474	*Subordinated securities*
Liabilitas kontrak asuransi	22,381,021	-	-	-	-	22,381,021	*Insurance contract liabilities*
Liabilitas kontrak reasuransi	9,757	-	-	-	-	9,757	*Reinsurance contract liabilities*
Liabilitas lain-lain*)	2,056,900	-	-	-	-	2,056,900	*Other liabilities*)
Total	**875,283,738**	**162,719,430**	**28,104,640**	**51,143,333**	**66,534,912**	**1,183,786,053**	***Total***
Total aset lancar **)	**159,742,968**	**12,146,534**	**14,724,410**	**7,130,461**	**122,827,800**	**316,572,173**	***Total liquid assets**)**
KOMITMEN DAN KONTINJENSI							***COMMITMENT AND CONTINGENCIES***
Fasilitas kredit kepada debitur yang belum digunakan	93,616,400	-	-	-	-	93,616,400	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	1,322,953	4,823,150	1,537,496	2,006,092	1,397,260	11,086,951	*Outstanding irrevocable letters of credit*
Garansi yang diterbitkan	7,185,156	15,587,302	13,211,190	16,565,135	54,077,181	106,625,964	*Guarantees issued*
Total	**102,124,509**	**20,410,452**	**14,748,686**	**18,571,227**	**55,474,441**	**211,329,315**	***Total***

2024

	Kurang dari 1 Bulan/ *Less than 1 Month*	1 - 3 Bulan/ *Months*	3 - 6 Bulan/ *Months*	6 - 12 Bulan/ *Months*	Lebih dari 12 Bulan/ *More than 12 Months*	Total	
LIABILITAS							***LIABILITIES***
Liabilitas segera	5,514,720	-	-	-	-	5,514,720	*Obligations due immediately*
Simpanan nasabah	659,303,325	79,978,318	37,378,681	30,280,627	1,583,846	808,524,797	*Deposits from customers*
Simpanan dari bank lain	14,395,602	1,443,612	1,262,723	1,414,936	31,591	18,548,464	*Deposits from other banks*
Liabilitas derivatif	1,479,185	-	-	-	-	1,479,185	*Derivative payables*
Liabilitas akseptasi	532,009	2,600,816	1,015,831	72,457	8,372	4,229,485	*Acceptance payables*
Efek-efek yang diterbitkan	-	80,625	4,293,079	246,704	10,637,428	15,257,836	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	9,689,028	49,678	136,599	186,278	6,679,566	16,741,149	*Securities sold under agreements to repurchase*
Pinjaman yang diterima	4,223,302	6,501,505	16,280,117	17,127,735	3,464,181	47,596,840	*Borrowings*
Efek-efek subordinasi	-	358,516	-	8,406,016	19,101,144	27,865,676	*Subordinated securities*
Liabilitas kontrak asuransi	19,203,101	-	-	-	-	19,203,101	*Borrowings*
Liabilitas kontrak reasuransi	6,575	-	-	-		6,575	*Subordinated securities*
Liabilitas lain-lain*)	1,395,469	-	-	-	-	1,395,469	*Other liabilities*)
Total	**715,742,316**	**91,013,070**	**60,367,030**	**57,734,753**	**41,506,128**	**966,363,297**	***Total***
Total aset lancar **)	**105,169,035**	**8,036,442**	**3,603,644**	**2,649,837**	**117,141,416**	**236,600,374**	***Total liquid assets**)**

*) Liabilitas lain-lain terdiri dari utang ke pemegang polis, setoran jaminan, rekening dalam penyelesaian, utang reasuransi dan komisi, serta utang nasabah - Entitas Anak.
**) Aset lancar terdiri dari kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada bank lain dan Bank Indonesia dan Obligasi Pemerintah

*) *Other liabilities consist of obligation to policyholders, guarantee deposits, unsettled account, reinsurance payable and commission, and payable to customer - Subsidiary.*
**) *Liquid assets consist of cash, current accounts with Bank Indonesia, current accounts with other banks, placement with other banks and Bank Indonesia and Government Bonds.*

50. RISIKO LIKUIDITAS (lanjutan) / *50. LIQUIDITY RISK (continued)*

	2024						
	Kurang dari 1 Bulan/ *Less than 1 Month*	1 - 3 Bulan/ *Months*	3 - 6 Bulan/ *Months*	6 - 12 Bulan/ *Months*	Lebih dari 12 Bulan/ *More than 12 Months*	Total	
KOMITMEN DAN KONTINJENSI							***COMMITMENT AND CONTINGENCIES***
Fasilitas kredit kepada debitur yang belum digunakan	57,552,807	-	-	-	-	57,552,807	*Unused loan facilities*
Irrevocable letters of credit yang masih berjalan	2,864,725	4,637,284	843,350	368,650	1,238,651	9,952,660	*Outstanding irrevocable letters of credit*
Garansi yang diterbitkan	11,336,806	8,350,111	9,944,176	19,245,410	24,574,477	73,450,980	*Guarantees issued*
Total	**71,754,338**	**12,987,395**	**10,787,526**	**19,614,060**	**25,813,128**	**140,956,447**	***Total***

Dalam rangka meningkatkan ketahanan likuiditas, Bank menerapkan perhitungan rasio kecukupan likuiditas yaitu *Liquidity Coverage Ratio* (LCR) dan *Net Stable Funding Ratio* (NSFR) dan mengelola rasio Kecukupan Likuiditas tersebut sesuai ketentuan regulator, baik secara individu (Entitas Induk) maupun konsolidasi dengan Entitas Anak (tidak diaudit).

In order to strengthen liquidity resilience, the Bank applies the calculation of liquidity adequacy ratios, namely the Liquidity Coverage Ratio (LCR) and the Net Stable Funding Ratio (NSFR), and manages these liquidity adequacy ratios in accordance with regulatory requirements, both on an individual basis (Parent Entity) and on a consolidated basis with Subsidiaries (unaudited).

LCR bertujuan untuk meningkatkan ketahanan likuiditas jangka pendek dengan memelihara *High Quality Liquid Assets* (HQLA) yang memadai untuk memenuhi kebutuhan likuiditas Bank selama periode 30 hari ke depan dalam kondisi *stress,* sedangkan NSFR bertujuan untuk mengurangi risiko likuiditas terkait sumber pendanaan untuk jangka waktu yang lebih panjang dengan mensyaratkan Bank mendanai aktivitas dengan sumber dana stabil yang memadai dalam rangka memitigasi risiko kesulitan pendanaan pada masa depan.

LCR aims to improve the Bank's short-term liquidity resilience by maintaining High Quality Liquid Assets (HQLA) to meet liquidity needs over the next 30 days under stress conditions, while NSFR aims to reduce liquidity risk related to longer term funding sources requiring Bank to fund activities with sufficient stable funding sources in order to mitigate future financial hardship risks.

Laporan rasio Kecukupan Likuiditas Bank tersebut dilaporkan secara bulanan dan triwulanan kepada Otoritas Jasa Keuangan (OJK) (tidak diaudit).

The Bank's Liquidity Adequacy Ratio are reported monthly and quarterly to the Otoritas Jasa Keuangan (OJK) (unaudited).

51. RISIKO PASAR / *51. MARKET RISK*

Risiko pasar di BNI bersumber dari posisi neraca, rekening administratif, dan transaksi derivatif, termasuk risiko perubahan harga opsi. BNI terekspos risiko pasar pada aktivitas *trading book* maupun *banking book*. Bank secara individual terekspos risiko pasar yang bersumber dari pergerakan suku bunga dan nilai tukar. Sementara, Bank secara konsolidasian selain dari pergerakan suku bunga dan nilai tukar juga bersumber dari pergerakan ekuitas (saham) dan komoditas.

Market risk at the BNI arises from balance sheet positions, off-balance-sheet accounts, and derivative transactions, including the risk of changes in option prices. The Bank is exposed to market risk in both trading book and banking book activities. On a standalone basis, the Bank is exposed to market risk arising from movements in interest rates and foreign exchange rates. Meanwhile, on a consolidated basis, the Bank is also exposed to market risk arising from movements in equity prices and commodity prices.

51. RISIKO PASAR (lanjutan)

Dalam pengelolaan risiko pasar, Bank menerapkan pemisahan fungsi treasuri ke dalam *front office*, *middle office*, dan *back office* untuk memastikan proses berjalan independen dan saling mengontrol. *Front office* menjalankan aktivitas transaksi dan pencapaian target bisnis, sekaligus bertindak sebagai *risk owner* pada lini pertama dengan kewajiban menjaga eksposur dalam *risk appetite* dan limit yang ditetapkan. *Middle office* melakukan pemantauan dan pengendalian risiko secara independen, termasuk pemeriksaan kewajaran harga, kepatuhan penggunaan limit, dan deteksi indikasi transaksi *off-market,* sedangkan *back office* bertanggung jawab atas konfirmasi, pembukuan, dan *settlement* transaksi untuk menjaga kepastian dan integritas eksekusi.

Dari sisi *second line*, Divisi ERM melakukan pemantauan terhadap efektivitas kerangka, metodologi dan kontrol risiko pasar. Dalam pelaksanaanya, Divisi ERM melakukan pemantauan risiko pasar dan kepatuhan atas limit risiko baik limit risiko pasar, limit kewenangan maupun limit *counterpart*, melakukan validasi terhadap *fixing price*, memeriksa kewajaran harga atas transaksi treasuri dan investigasi terjadinya *off market* dan melakuan reviu penggunaan limit. Pengawasan Direksi atas risiko pasar dilakukan melalui forum rapat di tingkat Direksi, seperti pada Komite Manjamen Risiko dan *Anti Fraud* (KRA-RMC), untuk memastikan arah bisnis treasuri tetap *prudent*, terdiversifikasi, dan berkelanjutan, selaras dengan ketahanan modal dan strategi pertumbuhan Bank.

Untuk mendukung pertumbuhan bisnis yang dan prudent, Bank telah memiliki Pedoman Perusahaan (PP) Risiko Pasar yang mengatur tata laksana, metodologi, model pengukuran, dan kontrol risiko pasar, termasuk untuk aktivitas tresuri dan bisnis internasional. Pedoman ini menjadi acuan operasional bagi unit bisnis dalam menjaga eksposur agar tetap terukur dan dalam batas selera risiko Bank.

Pengukuran risiko pasar di BNI dilakukan secara berkala terhadap portofolio *trading book* dan *banking book* yang terekspos risiko pasar. Untuk pemenuhan Kewajiban Penyediaan Modal Minimum (KPMM) Risiko Pasar, BNI menggunakan pendekatan standar sesuai ketentuan regulator, yang mencakup pengukuran risiko suku bunga dan nilai tukar. Sementara untuk pengelolaan risiko pasar harian, Bank menggunakan *Value at Risk* (VaR) sebagai alat ukur potensi kerugian maksimum dalam kondisi pasar yang normal, dilengkapi pengukuran sensitivitas DV01 (per 1 bps) pada portofolio surat berharga, serta *delta* untuk transaksi opsi.

***51. MARKET RISK** (continued)*

In managing market risk, the Bank applies a segregation of treasury functions into front office, middle office, and back office to ensure independent processes and effective checks and balances. The front office conducts transaction activities and pursues business targets, while also acting as the risk owner at the first line of defense, with responsibility for maintaining exposures within the approved risk appetite and limits. The middle office independently monitors and controls risks, including the assessment of price reasonableness, compliance with limit utilization, and the detection of indications of off-market transactions. The back office is responsible for transaction confirmation, booking, and settlement to ensure the certainty and integrity of transaction execution.

From the second line of defense, the ERM Division monitors the effectiveness of the market risk framework, methodologies and controls. In carrying out its role, ERM Division monitors market risk exposures and compliance with risk limits, including market risk limits, authority limits, and counterparty limits; performs validation of fixing prices; assesses the reasonableness of prices on treasury transactions; investigates the occurrence of off-market transactions; and reviews limit utilization. The Board of Directors' oversight of market risk is exercised through Board-level forums, such as the Risk Management and Anti-Fraud Committee (KRA-RMC), to ensure that treasury business activities remain prudent, well-diversified, and sustainable, in line with the Bank's capital resilience and growth strategy.

To support prudent business growth, the Bank's has established a Market Risk Corporate Policy that governs governance arrangements, methodologies, measurement models, and market risk controls, including those related to treasury activities and international business. This policy serves as an operational reference for business units to ensure that exposures remain measurable and within the Bank's risk appetite.

Market risk measurement at the BNI is conducted on a regular basis for trading book and banking book portfolios that are exposed to market risk. For the purpose of meeting the Minimum Capital Adequacy Requirement (CAR) for market risk, the Bank applies the standardized approach in accordance with regulatory requirements, which covers the measurement of interest rate risk and foreign exchange risk. Meanwhile, for daily market risk management, BNI uses Value at Risk (VaR) as a tool to measure the maximum potential loss under normal market conditions, complemented by DV01 (per 1 basis point) sensitivity measurement for securities portfolios, as well as delta measurement for option transactions.

51. RISIKO PASAR (lanjutan)

Pengelolaan risiko suku bunga dalam *banking book* dilakukan melalui *Interest Rate Risk in The Banking Book* (IRRBB) yaitu risiko akibat pergerakan suku bunga di pasar yang berlawanan dengan posisi banking book, yang berpotensi memberikan dampak terhadap permodalan (*economic value perspective*) dan pendapatan Bank (*earning perspective*) baik untuk saat ini maupun pada masa mendatang.

Untuk mengetahui potensi dampak perubahan kondisi internal dan eksternal, pada Bank melakukan *scenario analysis* dan *stress testing* secara periodik dan insidentil. *Stress testing* secara periodik menggunakan skenario yang mengacu pada ketentuan regulator dan skenario internal Bank. Sedangkan skenario *stress testing* insidentil dan *scenario analysis* menyesuaikan kondisi faktor makro ekonomi dan faktor pasar pada saat itu. Hasil *stress testing* tersebut digunakan untuk menyiapkan *Contingency Plan* agar risiko yang terjadi dapat dimitigasi dan dikelola dengan baik.

Selanjutnya, pengendalian risiko pasar dilakukan dalam rangka mencegah terjadinya kerugian yang lebih dalam akibat Risiko Pasar melalui penetapan appetite risiko dan limit risiko pasar baik di Divisi TRS maupun Kantor Luar Negeri. Limit risiko pasar diantaranya:

1. Limit PDN,
2. Limit IRRBB (NII & EVE),
3. Limit *Value at Risk*,
4. Limit *Stress Value at Risk Limit* (SVaR *Limit*),
5. Limit *Budget Loss*,
6. *Management Action Trigger* (MAT),
7. Limit DV01,
8. Limit Delta Option,
9. Limit pembelian surat berharga
10. Limit *Nominal open position*,

Untuk mendukung keseluruhan proses pengelolaan risiko pasar tersebut, Bank telah mengembangkan perangkat pendukung serta sistem informasi manajemen risiko pasar secara menyeluruh sehingga risiko dapat terukur dan dimitigasi dengan baik.

***51. MARKET RISK** (continued)*

Interest rate risk management in the banking book is carried out through Interest Rate Risk in the Banking Book (IRRBB), which represents the risk arising from movements in market interest rates that are adverse to banking book positions and may have an impact on the Bank's capital (economic value perspective) and earnings (earnings perspective), both in the current period and in the future.

To assess the potential impact of changes in internal and external conditions, the Bank conducts scenario analysis and stress testing on a periodic and incidental basis. Periodic stress testing applies scenarios that refer to regulatory requirements as well as the Bank's internal scenarios. Meanwhile, incidental stress testing and scenario analysis are tailored to prevailing macroeconomic and market conditions at the time. The results of such stress testing are used to prepare Contingency Plan to ensure that emerging risks can be properly mitigated and managed.

Furthermore, market risk control is implemented to prevent more severe losses arising from market risk through the establishment of risk appetite and market risk limits, both at the TRS Division and Overseas Branches. Market risk limits include, among others:

1. *Net Open Position (NOP) limit;*
2. *IRRBB limits (NII and EVE);*
3. *Value at Risk (VaR) limit;*
4. *Stressed Value at Risk (SVaR) limit;*
5. *Budget Loss limit;*
6. *Management Action Trigger (MAT);*
7. *DV01 limit;*
8. *Option delta limit;*
9. *Securities purchase limit;*
10. *Nominal open position limit.*

To support the overall market risk management process, the Bank has developed comprehensive supporting tools and an integrated market risk management information system, enabling market risks to be properly measured and effectively mitigated.

51. RISIKO PASAR (lanjutan)

Sehubungan dengan penggunaan model internal yaitu *Value at Risk* (VaR) dalam pengukuran risiko pasar, Bank telah melakukan proses validasi melalui *backtesting* secara periodik untuk menilai akurasi pengukuran VaR yang digunakan. Metode yang digunakan Bank dalam menghitung VaR adalah *historical simulation* yaitu yang metode tidak membutuhkan asumsi bahwa pergerakan faktor pasar terdistribusi normal. Bank menghitung VaR berdasarkan 250 hari data faktor pasar historis pada tingkat keyakinan 99%.

Tabel di bawah ini menunjukkan VaR agregat pada portofolio *trading book* dan *banking book* milik Bank: (tidak diaudit)

***51. MARKET RISK** (continued)*

With regard to the use of an internal model, that is Value at Risk (VaR) in measuring market risk, the Bank conducts periodic validation through backtesting to assess the accuracy of the VaR measurement applied. The VaR methodology used by the Bank is historical simulation, which does not require the assumption that market factor movements are normally distributed. The Bank calculates VaR based on 250 days of historical market factor data at a 99% confidence level.

The table below presents the aggregate VaR on the Bank's trading book and banking book portfolio: (unaudited)

	2025			
	Risiko mata uang asing/ *Foreign exchange risk*	**Risiko nilai wajar suku bunga/ *Fair value interest rate risk***		
		Trading book	***Banking book***	
2025 - 31 Desember	7,224	429,537	192,940	*2025 - 31 December*
2025 - Rata-rata harian	33,151	75,902	264,818	*2025 - Average daily*
2025 - Tertinggi	230,827	429,537	469,172	*2025 - Highest*
2025 - Terendah	138	1,442	40,134	*2025 - Lowest*

	2024			
	Risiko mata uang asing/ *Foreign exchange risk*	**Risiko nilai wajar suku bunga/ *Fair value interest rate risk***		
		Trading book	***Banking book***	
2024 - 31 Desember	31,225	1,448	243,371	*2024 - 31 December*
2024 - Rata-rata harian	16,795	3,309	236,462	*2024 - Average daily*
2024 - Tertinggi	34,205	7,551	275,954	*2024 - Highest*
2024 - Terendah	1,740	1,396	186,284	*2024 - Lowest*

(i) Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul pada instrumen keuangan yang mempunyai kemungkinan kerugian akibat perubahan tingkat suku bunga yang akan berdampak pada arus kas masa depan atau nilai wajar instrumen keuangan.

Komite Manajemen Risiko dan *Anti Fraud* Sub Komite Manajemen Risiko (KRA-RMC) BNI, bertanggung jawab untuk menetapkan, melaksanakan serta menjaga kebijakan pengelolaan risiko tingkat suku bunga sesuai dengan pedoman umum BNI. Tujuan utama Komite Manajemen Risiko dan *Anti Fraud* Sub Komite Manajemen Risiko (KRA-RMC) BNI adalah memaksimalkan hasil usaha BNI dengan tetap memperhatikan limit risiko yang ditetapkan.

(i) Interest rate risk

Interest rate risks arise from financial instruments which have the loss possibilities from changes in interest rates that will affect future cash flows or fair value of the financial instruments.

BNI's Risk Management and Anti Fraud Committee sub Committee Risk Management (KRA-RMC) held responsible for determining, executing and overseeing the interest rate risk management policy in accordance with the overall guidelines of BNI. The main objective of the Risk Management and Anti Fraud Committee sub Committee Risk Management (KRA-RMC) is to maximise BNI's returns within the predetermined risk limits.

51. RISIKO PASAR (lanjutan) / *MARKET RISK (continued)*

(i) Risiko tingkat suku bunga (lanjutan) / *(i) Interest rate risk (continued)*

Tabel di bawah ini merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas konsolidasian yang signifikan pada tanggal 31 Desember 2025 dan 2024:

The tables below summarise the range of contractual interest rates per annum for significant consolidated assets and liabilities as of 31 December 2025 and 2024:

2025

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	Dolar Australia/ *Australian Dollar* %	
ASET											***ASSETS***
Penempatan pada bank lain dan Bank Indonesia	1.00 - 6.50	2.00 - 4.15	-	-	-	2.60 - 2.80	-	-	-	-	*Placements with other banks and Bank Indonesia*
Efek-efek	4.85 - 11.00	2.30 - 5.50	-	-	-	-	-	-	-	-	*Marketable securities*
Tagihan Akseptasi	-	0.00 - 4.14	-	-	-	-	-	-	-	-	*Acceptance receivable*
Efek-efek yang dibeli dengan janji dijual kembali	4.20 - 4.90	3.93 - 4.90	-	-	-	-	-	-	-	-	*Securities purchase under agrrement to resell*
Wesel ekspor dan tagihan lainnya	0.00 - 8.05	0.00 - 6.00	-	-	-	-	-	-	-	-	*Bills and other receivables*
Pinjaman yang diberikan	0.00 - 22.50	0.00 - 11.25	3.20 - 7.00	0.41 - 4.23	3.27 - 4.00	3.88 - 6.00	-	-	1.50 - 7.55	5.94 - 7.00	*Loans*
Obligasi Pemerintah											*Government Bonds*
- Tingkat bunga tetap	4.88 - 12.00	0.50 - 7.75	0.90 -1.40	0.57 - 3.00	1.25 - 2.88	-	2.50	-	-	4.40	*Fixed interest rate -*
LIABILITAS											***LIABILITIES***
Simpanan nasabah	0.00 - 6.75	0.00 - 5.30	0.00 - 2.60	0.00 - 1.31	0.00 - 2.25	0.00 - 2.30	-	0.00 - 0.10	0.00 - 1.00	-	*Deposits from customers*
Simpanan dari bank lain	0.00 - 4.80	0.00 - 4.90	0.00 - 1.00	0.00 - 1.31	0.00 - 1.85	-	-	-	-	4.57	*Deposits from other banks*
Efek-efek yang dijual dengan janji dibeli kembali	4.75 - 8.38	1.85 - 4.75	-	-	-	-	-	-	-	-	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	0.55 - 6.85	5.28	-	-	-	-	-	-	-	-	*Securities issued*
Pinjaman yang diterima	5.08 - 9.00	4.06 - 8.00	2.34 - 2.40	-	1.85	-	-	-	-	4.35 - 4.57	*Borrowings*
Efek-efek subordinasi	-	3.75 - 4.30	-	-	-	-	-	-	-	-	*Subordinated securities*

2024

	Rupiah %	Dolar Amerika Serikat/ *United States Dollar* %	Euro Eropa/ *European Euro* %	Yen Jepang *Japanese Yen* %	Dolar Singapura/ *Singapore Dollar* %	Won Korea Selatan/ *South Korean Won* %	Yuan China/ *Chinese Yuan* %	Pound Sterling Inggris/ *Great Britain Pound Sterling* %	Dolar Hongkong/ *Hongkong Dollar* %	Dolar Australia/ *Australian Dollar* %	
ASET											***ASSETS***
Penempatan pada bank lain dan Bank Indonesia	0.00 - 7.00	2.00 - 5.17	-	-	-	3.10 - 3.20	3.85	-	-	-	*Placements with other banks and Bank Indonesia*
Efek-efek	5.35 - 11.25	2.30 - 6.00	-	-	-	-	-	-	-	-	*Marketable securities*
Tagihan Akseptasi	-	0.00 - 7.52	-	-	-	-	-	-	-	-	*Acceptance receivable*
Efek-efek yang dibeli dengan janji dijual kembali	6.45 - 6.80	4.37 - 4.57	-	-	-	-	-	-	-	-	*Securities Purchase under agrrement to resell*
Wesel ekspor dan tagihan lainnya	0.00 - 8.00	0.00 - 6.00	-	-	-	-	-	-	-	-	*Bills and other receivables*
Pinjaman yang diberikan	0.00 - 22.45	0.00 - 10.22	3.90 - 7.00	0.41 - 3.88	4.00 - 7.25	4.35 - 6.00	6.25	7.60 - 7.70	1.50 - 8.56	6.71 - 7.00	*Loans*
Obligasi Pemerintah											*Government Bonds*
- Tingkat bunga tetap	4.88 - 12.00	0.50 - 7.75	0.90-1.75	0.57 - 3.00	0.50 - 1.25	-	-	-	-	-	*Fixed interest rate -*
- Tingkat bunga mengambang	6.29	-	-	-	-	-	-	-	-	-	*Floating interest rate -*
LIABILITAS											***LIABILITIES***
Simpanan nasabah	0.00 - 8.10	0.00 - 6.25	0.00 - 0.10	0.00 - 0.07	0.00 - 2.25	0.00 - 0.25	-	0.00 - 0.10	0.00 - 3.70	-	*Deposits from customers*
Simpanan dari bank lain	0.00 - 6.90	0.00 - 5.14	-	0.00 - 0.77	0.00 - 3.28	-	-	-	-	-	*Deposits from other banks*
Efek-efek yang dijual dengan janji dibeli kembali	5.50 - 8.38	1.85 - 4.75	-	-	-	-	-	-	-	-	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	6.35 - 6.85	5.28	-	-	-	-	-	-	-	-	*Securities issued*
Pinjaman yang diterima	7.18 - 9.50	4.52 - 6.00	3.07 - 3.18	-	3.86	3.60	-	-	-	5.26	*Borrowings*
Efek-efek subordinasi	-	3.75 - 4.30	-	-	-	-	-	-	-	-	*Subordinated securities*

51. RISIKO PASAR (lanjutan)

(i) Risiko tingkat suku bunga (lanjutan)

Tabel berikut menunjukkan sensitivitas terhadap kemungkinan perubahan suku bunga dalam Rupiah yang wajar, dengan semua variabel lainnya tetap konstan, dalam laporan laba rugi Bank. Sensitivitas laporan laba rugi adalah dampak dari perubahan asumsi suku bunga pada laporan laba rugi pada tahun tersebut. Sensitivitas total laba atau rugi didasarkan pada asumsi bahwa ada pergeseran paralel kurva hasil.

***51. MARKET RISK** (continued)*

***(i) Interest rate risk** (continued)*

The following tables demonstrate the sensitivity to a reasonable possible change in Rp, interest rates, with all other variables held constant, in the Bank's profit or loss. The sensitivity of profit or loss is the effect of the changes in interest rates assumptions on the profit or loss for the year. The total sensitivity of profit or loss is based on the assumption that there are parallel shifts in the yield curve.

2025	
Perubahan persentase/ *Percentage change*	**Pengaruh terhadap laporan laba rugi/ *Impact to profit or loss***
±25 bps	± 490,605
±50 bps	± 981,209

2024	
Perubahan persentase/ *Percentage change*	**Pengaruh terhadap laporan laba rugi/ *Impact to profit or loss***
±25 bps	±320,582
±50 bps	±641,164

BNI memiliki eksposur terhadap risiko tingkat suku bunga dalam mata uang Dolar Singapura, Dolar Amerika Serikat, Euro dan lainnya. BNI telah melakukan penilaian atas dampak dari risiko tingkat suku bunga tersebut dan hasilnya tidak signifikan.

BNI has exposure to interest rate risks in Singapore Dollar, United States Dollar, Euro and others. BNI assessed that the impact of those interest rate risks is not significant.

(ii) Risiko mata uang

Risiko valuta asing timbul sebagai akibat adanya aset dan liabilitas keuangan dalam valuta asing dan rekening administratif konsolidasian baik pada sisi aset konsolidasian maupun liabilitas konsolidasian. Posisi valuta asing BNI dapat dikelompokkan dalam dua aktivitas yaitu: *trading book*, yang dilakukan dalam rangka memperoleh keuntungan transaksi valuta asing, dan *banking book*, yang dilakukan dalam rangka mengendalikan Posisi Devisa Neto BNI secara keseluruhan.

BNI memiliki kebijakan untuk menjaga eksposur mata uang asing dalam batas yang wajar dan berdasarkan peraturan yang berlaku. Manajemen berkeyakinan bahwa saat ini eksposur mata uang asing atas aset dan liabilitas masih dalam batas yang konservatif.

(ii) Currency risk

Foreign currency risks arise from the consolidated financial assets and liabilities and administrative accounts in foreign currency positions, both on the consolidated assets and liabilities. BNI's foreign currency position is divided into two activities: the trading book, which is prepared to generate profit from the exchange rate, and the banking book, which is prepared to control BNI's overall Net Open Position.

BNI's policy is to maintain foreign currency exposure within acceptable limits and within existing regulatory guidelines. The Management believes that its current profile of foreign currency exposure on its assets and liabilities is within conservative limits.

Informasi tambahan risiko pasar yang merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia diungkapkan pada Catatan 61m.

The following additional information market risk that is required by regulations and/or additional disclosure prepared by the Group, and is not required by Indonesian Accounting Standards is disclosed in Note 61m.

52. RISIKO OPERASIONAL

Informasi tambahan risiko operasional yang merupakan informasi disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia diungkapkan pada Catatan 61n.

52. OPERATIONAL RISK

The following additional information operational risk that is required by regulations and/or additional disclosure prepared by the Group, and is not required by Indonesian Accounting Standards is disclosed in Note 61n.

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari semua aset dan liabilitas keuangan disajikan per kategori dari instrumen keuangan. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal-tanggal 31 Desember 2025 dan 2024, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES

The table below summarises the comparison between the carrying amounts and fair values of all financial assets and liabilities presented per category of financial instruments. The fair values disclosed are based on relevant information available as of 31 December 2025 and 2024, and not updated to reflect changes in market conditions which have occurred after this date.

	2025		2024		
	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	Nilai Tercatat/ *Carrying Value*	Nilai wajar/ *Fair value*	
Aset keuangan					***Financial assets***
Kas	13,352,065	13,352,065	13,709,930	13,709,930	*Cash*
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Efek-efek	31,800,444	31,800,444	23,959,614	23,959,614	*Marketable securities*
Obligasi Pemerintah	5,594,298	5,594,298	3,957,073	3,957,073	*Government Bonds*
Tagihan derivatif	5,422,349	5,422,349	1,792,978	1,792,978	*Derivatives receivable*
	42,817,091	42,817,091	29,709,665	29,709,665	
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Obligasi Pemerintah	123,037,457	123,037,457	90,904,441	90,904,441	*Government Bonds*
Efek-efek	31,149,571	31,149,571	24,187,442	24,187,442	*Marketable securities*
Penyertaan saham	652,311	652,311	637,280	637,280	*Equity investments*
	154,839,339	154,839,339	115,729,163	115,729,163	
Biaya perolehan diamortisasi					***Amortised cost***
Pinjaman yang diberikan	863,670,065	863,670,065	737,187,258	737,187,258	*Loans*
Giro pada Bank Indonesia	79,989,122	79,989,122	51,669,054	51,669,054	*Current accounts with Bank Indonesia*
Obligasi Pemerintah	34,881,146	36,160,839	37,210,055	36,984,557	*Government Bonds*
Penempatan pada bank lain dan Bank Indonesia	33,779,915	33,779,915	17,075,441	17,075,441	*Placements with other banks and Bank Indonesia*
Giro pada bank lain	25,938,086	25,938,086	22,074,173	22,074,173	*Current accounts with other banks*
Tagihan akseptasi	19,448,760	19,448,760	15,925,521	15,925,521	*Acceptance receivables*
Wesel ekspor dan tagihan lainnya	13,452,846	13,452,846	13,243,026	13,243,026	*Bills and other receivables*
Aset lain-lain - bersih*)	14,085,345	14,085,345	8,858,737	8,858,737	*Other assets - net*)*
Efek-efek yang dibeli dengan janji dijual kembali	6,910,606	6,910,606	7,971,923	7,971,923	*Securities purchased under agreement to resell*
Efek-efek	66,665	66,935	387,017	387,290	*Marketable securities*
Aset kontrak asuransi dan aset reasuransi	80,895	80,895	99,181	99,181	*Insurance and reinsurance contract*
	1,092,303,451	1,093,583,414	911,701,386	911,476,161	
	1,303,311,946	**1,304,591,909**	**1,070,850,144**	**1,070,624,919**	

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

	2025		2024		
	Nilai Tercatat/ *Carrying Value*	**Nilai wajar/ *Fair value***	**Nilai Tercatat/ *Carrying Value***	**Nilai wajar/ *Fair value***	
Liabilitas keuangan					***Financial liabilities***
Nilai wajar melalui laporan laba rugi					***Fair value through profit or loss***
Liabilitas derivatif	5,398,899	5,398,899	1,479,185	1,479,185	*Derivative payables*
Liabilitas keuangan lainnya					***Other financial liabilities***
Simpanan nasabah					*Deposits from customers*
Giro	439,498,864	439,498,864	305,733,528	305,733,528	*Current accounts*
Tabungan	286,460,151	286,460,151	257,544,353	257,544,353	*Savings account*
Deposito berjangka	314,875,409	314,875,409	242,232,967	242,232,967	*Time deposits*
Pinjaman yang diterima	39,040,387	39,040,387	42,931,444	42,931,444	*Borrowings*
Liabilitas lain-lain**)	2,056,900	2,056,900	1,395,469	1,395,469	*Other liabilities**)*
Efek-efek subordinasi	18,339,988	17,615,397	17,699,183	17,079,032	*Subordinated securities*
Simpanan dari bank lain					*Deposits from other banks*
Pinjaman pasar uang antar bank	6,429,564	6,429,564	12,294,527	12,294,527	*Inter-bank call money*
Giro	3,486,785	3,486,785	3,725,403	3,725,403	*Current accounts*
Deposito berjangka	746,784	746,784	831,067	831,067	*Time deposit*
Negotiable Certificate of Deposit	-	-	770,760	770,760	*Negotiable Certificate of Deposit*
Simpanan lainnya	899,650	899,650	926,707	926,707	*Other deposits*
Efek-efek yang dijual dengan janji dibeli kembali	7,251,381	7,251,381	15,890,945	15,890,945	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	14,253,190	14,602,279	12,974,497	13,167,926	*Securities issued*
Liabilitas segera	5,761,037	5,761,037	5,514,720	5,514,720	*Obligation due immediately*
Liabilitas kontrak asuransi	22,381,021	22,381,021	19,203,101	19,203,101	*Insurance contract liabilities*
Liabilitas kontrak reasuransi	9,757	9,757	6,575	6,575	*Reinsurance contract liabilities*
Liabilitas akseptasi	2,324,505	2,324,505	4,229,484	4,229,484	*Acceptance payables*
	1,163,815,373	1,163,439,871	943,904,730	943,478,008	
	1,169,214,272	**1,168,838,770**	**945,383,915**	**944,957,193**	

*) Aset lain-lain - bersih terdiri dari piutang bunga, piutang terkait transaksi ATM dan kartu kredit, piutang lain-lain dan piutang dari nasabah - Entitas Anak.

**) Liabilitas lain-lain terdiri dari utang ke pemegang polis, setoran jaminan, rekening dalam penyelesaian, utang reasuransi dan komisi, serta utang nasabah - Entitas Anak.

*) *Other assets - net consist of interest receivables, receivables from transactions related to ATM and credit card, other receivables and receivables from customers - Subsidiary.*

**) *Other liabilities consist of obligation to policyholders, guarantee deposits, unsettled account, reinsurance payable and commission, and payable to customers - Subsidiary.*

Bank menggunakan hirarki berikut untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan:

(i) Tingkat 1: Harga dikutip (tidak disesuaikan) dari pasar yang aktif untuk aset atau liabilitas keuangan yang identik;
(ii) Tingkat 2: *Input* selain harga yang dikutip dari pasar yang disertakan pada Tingkat 1 yang dapat diobservasi untuk aset dan liabilitas keuangan, baik secara langsung (yaitu sebagai sebuah harga) atau secara tidak langsung (yaitu sebagai turunan dari harga);
(iii) Tingkat 3: *Input* untuk aset atau liabilitas keuangan yang tidak didasarkan pada data pasar yang dapat diobservasi (informasi yang tidak dapat diobservasi).

The Bank adopts the following hierarchy for determining and disclosing the fair value of financial instruments:

(i) Level 1: Quoted prices in active market for the same/identical financial asset or liability;

(ii) Level 2: Inputs other than quoted market prices included in Level 1 that are observable for the financial asset or liability, either directly (as a price) or indirectly (as derived from price);

(iii) Level 3: Inputs for the financial assets or liability that are not based on observable market data (unobservable information).

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menunjukkan instrumen keuangan yang diukur pada nilai wajar yang dikelompokkan berdasarkan hirarki nilai wajar:

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES (continued)

The table below shows the financial instruments measured at fair value grouped according to the fair value hierarchy:

2025

	Nilai tercatat/ *Carrying value*	Nilai wajar/*Fair value* Tingkat/ *Level 1*	Tingkat/ *Level 2*	Tingkat/ *Level 3*	
Aset keuangan					***Financial assets***
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Efek-efek	31,800,444	1,265,695	30,497,528	37,221	*Marketable securities*
Obligasi Pemerintah	5,594,298	5,594,298	-	-	*Government Bonds*
Tagihan derivatif	5,422,349	-	5,422,349	-	*Derivative receivables*
	42,817,091	6,859,993	35,919,877	37,221	
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Obligasi Pemerintah	123,037,457	93,591,363	29,446,094	-	*Government Bonds*
Efek-efek	31,149,571	21,623,267	9,526,304	-	*Marketable securities*
Penyertaan saham	652,311	-	-	652,311	*Equity investments*
	154,839,339	115,214,630	38,972,398	652,311	
	197,656,430	**122,074,623**	**74,892,275**	**689,532**	
Liabilitas keuangan					***Financial liabilities***
Nilai wajar melalui laporan laba rugi					***Fair value through profit or loss***
Liabilitas derivatif	5,398,899	-	5,398,899	-	*Derivatives payable*
	5,398,899	-	5,398,899	-	

2024

	Nilai tercatat/ *Carrying value*	Nilai wajar/*Fair value* Tingkat/ *Level 1*	Tingkat/ *Level 2*	Tingkat/ *Level 3*	
Aset keuangan					***Financial assets***
Nilai wajar melalui laba rugi					***Fair value through profit or loss***
Efek-efek	23,959,614	1,160,733	22,777,322	21,559	*Marketable securities*
Obligasi Pemerintah	3,957,073	3,957,073	-	-	*Government Bonds*
Tagihan derivatif	1,792,978	-	1,792,978	-	*Derivative receivables*
	29,709,665	5,117,806	24,570,300	21,559	
Nilai wajar melalui penghasilan komprehensif lain					***Fair value through other comprehensive income***
Obligasi Pemerintah	90,904,441	66,807,204	24,097,237	-	*Government Bonds*
Efek-efek	24,187,442	19,281,464	4,905,978	-	*Marketable securities*
Penyertaan saham	637,280	-	-	637,280	*Equity investments*
	115,729,163	86,088,668	29,003,215	637,280	
	145,438,828	**91,206,474**	**53,573,515**	**658,839**	
Liabilitas keuangan					***Financial liabilities***
Nilai wajar melalui laporan laba rugi					***Fair value through profit or loss***
Liabilitas derivatif	1,479,185	-	1,479,185	-	*Derivatives payable*
	1,479,185	-	1,479,185	-	

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

Teknik penilaian dan *input* signifikan atas nilai wajar tingkat 3 untuk beberapa penyertaan saham pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

Valuation technique and significant input for fair value of level 3 for investments as 31 December 2025 and 2024 are as follows:

Akun	Teknik Penilaian/ *Valuation Technique*	*Input* Signifikan/*Significant Input*	2025 %	2024 %	*Account*
Nilai wajar melalui laba rugi penghasilan komprehensif lain					***Fair value through comprehensive income***
PT Penyelesaian Transaksi Elektronik Nasional (PTEN)	Arus Kas yang Didiskontokan/ *Discounted cashflow*	Tingkat diskonto/*Discount rate*	11.32	16.05	*PT Penyelesaian Transaksi Elektronik Nasional (PTEN)*
		Tingkat bunga bebas risiko/*Risk-free rate*	5.01	6.89	
		Diskon Marketabilitas/*Discount for Lack of Marketability (DLOM)*	30.00	36.00	
		Diskon Minoritas/*Discount for Lack of Control (DLOC)*	30.00	35.00	
PT Fintek Karya Nusantara	- Arus Kas yang Didiskontokan/ *Discounted cashflow* (90%) - Metode Pembanding Perusahaan Tercatat di Bursa Efek (GCM)/ *Guideline Publicly Traded Company Method* (10%)	Tingkat diskonto/*Discount rate*	14.64	19.33	*PT Fintek Karya Nusantara*
		Tingkat pertumbuhan perpetuitas/*Perpetuity Growth*	4.00	3.00	
		Diskon Marketabilitas/*Discount for Lack of Marketability (DLOM)*	30.00	30.00	
		Diskon Minoritas/*Discount for Lack of Control (DLOC)*	20.00	30.00	

Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hirarki nilai wajar.

Nilai wajar instrumen keuangan yang diperdagangkan dalam pasar aktif (contohnya surat berharga yang diukur dan tersedia untuk dijual), ditentukan dengan berdasarkan harga pasar yang dikutip pada tanggal pelaporan. Suatu pasar dianggap aktif apabila informasi mengenai harga kuotasian dapat diakses dengan mudah dan tersedia secara berkala dari suatu bursa, pedagang efek, broker, kelompok penilai harga pasar industri tertentu, regulator dan harga tersebut mencerminkan transaksi pasar yang aktual dan regular pada tingkat yang wajar. Harga pasar dikutip untuk aset keuangan yang dimiliki Grup adalah harga penawaran (*bid price*). Instrumen-instrumen tersebut digolongkan dalam Tingkat 1. Instrumen yang termasuk dalam Tingkat 1 umumnya meliputi investasi yang diklasifikasikan sebagai surat berharga yang diukur pada nilai wajar melalui laba rugi dan yang diukur pada nilai wajar melalui penghasilan komprehensif lain.

There is no transfer between level 1 and level 2 of the fair value hierarchy.

The fair value of financial instruments traded in an active market (i.e. measured and available-for-sale securities), is based on quoted market price at reporting date. A market is regarded as active if quoted prices are readily and regularly available from 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 length basis. The quoted market price used for financial asset held by Group is bid price. These instruments are included in Level 1. Instruments included in Level 1 comprise primarily of securities classified as fair value through profit or loss and fair value through other comprehensive income.

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

Nilai wajar instrumen keuangan yang tidak diperdagangkan di pasar aktif (contohnya derivatif *over-the-counter*) ditentukan dengan teknik penilaian. Teknik-teknik penilaian tersebut menggunakan data pasar yang dapat diobservasi dan sedapat mungkin meminimalisir penggunaan estimasi spesifik dari entitas. Apabila seluruh *input* yang dibutuhkan untuk menentukan nilai wajar instrumen keuangan dapat diobservasi, maka instrumen keuangan tersebut dikategorikan dalam Tingkat 2. Sebaliknya, jika salah satu atau lebih data tidak didasarkan pada data pasar yang dapat diobservasi, instrumen ini termasuk dalam Tingkat 3.

Teknik penilaian spesifik yang digunakan untuk melakukan penilaian pada instrumen keuangan, antara lain:

- Harga yang dikutip dari pasar atau pedagang efek instrumen serupa
- Nilai wajar dari *swap* tingkat suku bunga yang diperhitungkan sebagai nilai kini dari estimasi arus kas masa datang berdasarkan kurva imbal hasil yang dapat diobservasi
- Nilai wajar dari kontrak berjangka valuta asing yang ditentukan berdasarkan kurs berjangka pada tanggal pelaporan keuangan, dan
- Teknik-teknik lainnya, seperti analisis arus kas diskontoan yang digunakan untuk menentukan nilai wajar instrumen keuangan lainnya

(i) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada bank lain dan Bank Indonesia, efek-efek, wesel ekspor dan tagihan lainnya, efek-efek yang dibeli dengan janji dijual kembali, penyertaan saham, tagihan akseptasi dan aset lain-lain:

Penempatan pada bank lain dan Bank Indonesia merupakan penanaman dana dalam bentuk Bank Indonesia *Deposit Facility*, *Term Deposit, Deposit Facility Syariah*, *call money*, penempatan "*fixed-term*", deposito berjangka dan lain-lain.

Estimasi nilai wajar penyertaan saham ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasian yang serupa atau dinilai dengan menggunakan metode penilaian.

Nilai tercatat dari kas dan setara kas, serta penempatan dengan suku bunga mengambang adalah perkiraan yang layak atas nilai wajar.

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

The fair value of financial instruments that are not traded in an active market (i.e over-the-counter derivatives) is determined by using valuation techniques. These valuation techniques maximise 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 for the fair value of an instrument are observable, the instrument is included in Level 2. Otherwise, if one or more of the significant inputs is not based on observable market data, the instrument is included in Level 3.

Specific valuation techniques used to value financial instruments include:

- *Quoted market prices or dealer quotes for similar instruments*
- *Fair value of interest rate swap is calculated as the present value of estimated future cashflow based on observable yield curves*
- *Fair value of foreign exchange contracts is determined using forward exchange rates at reporting date, and*
- *Other techniques, such as discounted cash flow analysis, are used to determine fair value for other financial instruments*

(i) Current accounts with Bank Indonesia, current accounts with other banks, placements with other banks and Bank Indonesia, marketable securities, bills and other receivables, securities purchases under agreements to resell and other assets, equity investments, acceptance receivables and other assets:

Placements with other banks and Bank Indonesia represent placements in the form of Bank Indonesia Deposit Facility, *Term Deposit, Sharia Deposit Facility, call money, "fixed-term" placements, time deposits and others.*

The fair value for equity investment are based on the market prices or broker/dealer price quotations. When this information is not available, the fair value is estimated using quoted market prices for securities with similar characteristics or using valuation model.

The carrying amount of cash and cash equivalents, as well as placements with floating rates are a reasonable approximation of fair value.

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

(i) Giro pada Bank Indonesia, giro pada bank lain, penempatan pada bank lain dan Bank Indonesia, efek-efek, wesel ekspor dan tagihan lainnya, efek-efek yang dibeli dengan janji dijual kembali, penyertaan saham, tagihan akseptasi dan aset lain-lain: (lanjutan)

Estimasi nilai wajar terhadap penempatan dengan suku bunga tetap, efek-efek, wesel ekspor dan tagihan lainnya, tagihan akseptasi dan aset lain-lain ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga pasar uang yang berlaku untuk utang dengan risiko kredit dan sisa jatuh tempo yang serupa. Karena sisa jatuh tempo di bawah satu tahun sehingga nilai tercatat dari penempatan dengan suku bunga tetap, wesel ekspor dan tagihan lainnya, efek-efek yang dibeli dengan janji untuk dijual kembali, tagihan akseptasi dan aset lain-lain adalah perkiraan yang layak atas nilai wajar.

(ii) Pinjaman yang diberikan

Portofolio kredit Bank secara umum terdiri dari pinjaman yang diberikan dengan suku bunga mengambang dan pinjaman yang diberikan jangka pendek dengan suku bunga tetap. Pinjaman yang diberikan dinyatakan berdasarkan *amortised cost*. Nilai wajar dari pinjaman yang diberikan menunjukkan nilai diskon dari perkiraan arus kas masa depan yang diharapkan akan diterima oleh Bank dengan menggunakan suku bunga pasar saat ini.

Nilai tercatat dari pinjaman yang diberikan dengan suku bunga mengambang dan nilai tercatat atas pinjaman jangka pendek dengan suku bunga tetap adalah perkiraan yang layak atas nilai wajar.

(iii) Liabilitas segera, simpanan nasabah dan simpanan dari bank lain, liabilitas akseptasi dan liabilitas lain-lain

Estimasi nilai wajar liabilitas segera, simpanan tanpa jatuh tempo, termasuk simpanan tanpa bunga adalah sebesar jumlah yang harus dibayarkan kembali sewaktu-waktu.

Estimasi nilai wajar terhadap simpanan dengan tingkat suku bunga tetap dan liabilitas akseptasi ditetapkan berdasarkan diskonto arus kas dengan menggunakan suku bunga utang baru dengan sisa jatuh tempo yang serupa. Karena sisa jatuh tempo dibawah satu tahun sehingga nilai tercatat dari simpanan dengan suku bunga tetap, liabilitas akseptasi dan liabilitas lain-lain adalah perkiraan yang layak atas nilai wajar.

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

(i) Current accounts with Bank Indonesia, current accounts with other banks, placements with other banks and Bank Indonesia, marketable securities, bills and other receivables, securities purchases under agreements to resell and other assets, equity investments, acceptance receivables and other assets: (continued)

The estimated fair values of fixed interest bearing placements, marketable securities, bills and other receivables, acceptance receivables and other assets were based on discounted cash flows using prevailing money market interest rates for debts with similar credit risk and remaining maturity. Since the maturity is less than one year, the carrying amounts of fixed rate placements, bills and other receivables, securities purchased under agreements to resell, acceptance receivables and other assets were a reasonable approximation of their fair value.

(ii) Loans

Generally, the Bank's portfolio consists of loans with floating interest rate and short-term loans with fixed interest rate. Loans are stated at amortised cost. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received by the Bank using the current market rates.

The carrying amount of floating rate loans and short-term fixed rate loans are the reasonable approximation of their fair values.

(iii) Obligations due immediately, deposits from customers and deposits from other banks, acceptance payables and other liabilities

The estimated fair value of obligations due immediately, deposits with no stated maturity, which include non-interest bearing deposits, are the amounts repayable on demand.

The estimated fair values of fixed interest-bearing deposits and acceptance payables are based on discounted cash flows using interest rates for new debts with similar remaining maturity. Since the maturity is below one year, the carrying amounts of fixed rate deposits, acceptance payables and other liabilities are the reasonable approximation of their fair values.

53. NILAI WAJAR ASET DAN LIABILITAS KEUANGAN (lanjutan)

(iv) Efek-efek dan Obligasi Pemerintah

Nilai wajar untuk efek-efek dan Obligasi Pemerintah yang dimiliki hingga jatuh tempo ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa atau dinilai dengan menggunakan metode penilaian.

(v) Efek-efek yang diterbitkan, pinjaman yang diterima, dan efek-efek yang dijual dengan janji dibeli kembali dan efek-efek subordinasi.

Nilai wajar agregat berdasarkan model diskonto arus kas menggunakan kurva *yield* terkini yang tepat untuk sisa periode jatuh temponya.

53. FAIR VALUE OF FINANCIAL ASSETS AND LIABILITIES *(continued)*

(iv) Marketable securities and Government Bonds

The fair value for amortised cost marketable securities and Government Bonds are based on the market prices or broker/dealer price quotations. When this information is not available, the fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics or using internal valuation model.

(v) Securities issued, borrowings, securities sold under agreements to repurchase and subordinated securities.

Their aggregate fair values are based on discounted cash flow model using current yield curve appropriate for the remaining term to maturity.

54. MANAJEMEN MODAL

Tujuan manajemen permodalan Bank adalah untuk mempertahankan posisi modal yang kuat untuk mendukung pertumbuhan bisnis dan mempertahankan investor, deposan, pelanggan dan kepercayaan pasar. Dalam pengelolaan permodalan, Bank mempertimbangkan faktor-faktor seperti: pengembalian modal yang optimal pada pemegang saham, menjaga keseimbangan antara keuntungan yang lebih tinggi dengan *gearing ratio* serta keamanan yang diberikan oleh posisi modal yang sehat.

Informasi tambahan manajemen modal yang merupakan informasi disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia diungkapkan pada Catatan 61o.

54. CAPITAL MANAGEMENT

The Bank's capital management objective is to maintain a strong capital position to support business growth and to maintain investor, depositor, customer and market confidence. In managing its capital, the Bank considers factors such as: providing optimal capital rate of return to shareholders, maintaining a balance between high return gearing ratio and safety provided by a sound capital position.

The following additional information capital management that is required regulations and/or additional disclosure prepared by the Group, and is not required by Indonesian Accounting Standards is disclosed in Note 61o.

55. AKTIVITAS JASA LAINNYA

BNI menyediakan jasa kustodi, *trustee,* pengelolaan investasi dan reksadana kepada pihak-pihak ketiga. Aset yang terdapat dalam aktivitas jasa lainnya tidak termasuk dalam laporan keuangan konsolidasian ini. Jumlah komisi yang diterima dari pemberian jasa ini adalah masing-masing sebesar Rp82.687.538.765 (nilai penuh) dan Rp68.343.424.174 (nilai penuh) untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024.

55. OTHER ACTIVITIES

BNI provides custodian, trustee, investment management and mutual fund services to third parties. Assets that are held in other activities are not included in these consolidated financial statements. Total fees received from these services amounted to Rp82,687,538,765 (full amount) dan Rp68,343,424,174 (full amount) for the year ended 31 December 2025 and 2024, respectively.

55. AKTIVITAS JASA LAINNYA (lanjutan)

Kegiatan Jasa Kustodian

Jasa Kustodian BNI mendapat izin operasi oleh Bapepam dan LK berdasarkan Surat Keputusan No. KEP-162/PM/1991 tertanggal 9 Desember 1991. Kustodian BNI merupakan bagian dari Divisi *Banking Operations* dan Divisi *International Banking and Financial Institutions*, dimana jasa-jasa yang ditawarkan adalah sebagai berikut:

a. Penyimpanan (*safekeeping*) dan administrasi (*administration*) atas efek-efek maupun dokumen berharga lainnya;
b. Penyelesaian transaksi (*settlement*) jual dan beli efek berbentuk warkat (*script*) maupun tanpa warkat (*scriptless*);
c. Pengurusan hak-hak nasabah atas kepemilikan efek-efek yang disimpan sehingga hak tersebut efektif di rekening nasabah *(corporate action)*;
d. Perwalian *(proxy)* pada Rapat Umum Pemegang Saham dan Rapat Umum Pemegang Obligasi; dan
e. Penyampaian laporan *(reporting)* dan informasi *(information)* yang terkait dengan efek-efek dan/atau dokumen berharga milik nasabah yang disimpan dan diadministrasikan oleh Kustodian BNI.

Untuk memenuhi kebutuhan investor dalam melakukan investasi pada berbagai instrumen efek-efek, Kustodian BNI memfasilitasinya dengan menyediakan beragam layanan:

a. Kustodian umum untuk melayani investor yang melakukan investasi pada instrumen pasar modal dan pasar uang di Indonesia;

b. *Sub-Registry* untuk melayani investor yang melakukan transaksi dan investasi pada Surat Utang Negara (SUN - Obligasi Pemerintah atau Surat Perbendaharaan Negara) serta Sertifikat Bank Indonesia (SBI);

c. Kustodian reksadana (*mutual fund*) dan kontrak pengelolaan dana (*discretionary fund*) yang diterbitkan dan dikelola oleh manajer investasi; dan

d. Kustodian *Euroclear* bagi nasabah yang akan melakukan investasi dan penyelesaian transaksi efek-efek yang tercatat di *Euroclear Operations Centre,* Brussels. Kustodian BNI merupakan anggota langsung dari *Euroclear.*

***55. OTHER ACTIVITIES** (continued)*

Custodian Services

BNI Custodian Services has obtained an operating license based on the Decision Letter of Bapepam and LK No. KEP-162/PM/1991 dated 9 December 1991. BNI's Custodian Department, which is part of the Division Banking Operations and Division International Banking and Financial Institutions, provides a full range of custodian services such as:

a. Safekeeping and administration of marketable securities and other valuable assets;

b. Settlement and handling services for script and scriptless trading transactions;

c. Corporate action services related to the rights of the marketable securities;

d. Proxy services for its customers' shareholder meetings and bond holder meetings; and

e. Generate reports and information regarding customers' marketable securities which are kept and administered by BNI's custodian department.

In order to fulfill the investors' needs in investing in various marketable securities and instruments, BNI's Custodian Operations facilitates various services as follows:

a. General custodian which provides services to investors investing in capital markets or money markets in Indonesia;

b. Sub-Registry service provider for settlement of Government Debenture Debt (SUN - either Government Bonds or Surat Perbendaharaan Negara) and SBI transactions;

c. Custodian for mutual funds and discretionary funds issued and managed by investment manager; and

d. Euroclear Custodian for customer who is conducting investment and settlement of securities transactions listed in Euroclear Operations Center, Brussels. BNI Custodian is a direct member of Euroclear.

55. AKTIVITAS JASA LAINNYA (lanjutan)

Kegiatan Jasa Kustodian (lanjutan)

Pada tanggal-tanggal 31 Desember 2025 dan 2024, Kustodian BNI memiliki 237 nasabah dan 173 nasabah (tidak diaudit). Nasabah utama terdiri dari dana pensiun, perusahaan asuransi, bank, yayasan, perusahaan sekuritas, reksadana, institusi/badan hukum lain dan perseorangan. Nilai portofolio yang disimpan pada tanggal 31 Desember 2025 dan 2024 adalah masing-masing sebesar Rp302.082.876.185.464 (nilai penuh) dan Rp282.093.689.329.744 (nilai penuh).

BNI mengasuransikan portofolio nasabah yang disimpan di Kustodian terhadap kemungkinan kerugian yang timbul dari penyimpanan dan pemindahan efek-efek sesuai dengan ketentuan OJK, dahulu Bapepam dan LK.

Kegiatan Wali Amanat

BNI mendapat izin operasi untuk kegiatan wali amanat berdasarkan Surat Keputusan Badan Pengawas Pasar Modal dan Lembaga keuangan No. 01/STTD-WA/PM/1996 tertanggal 27 Maret 1996. Jasa-jasa yang ditawarkan oleh wali amanat adalah sebagai berikut:

a. Jasa Wali Amanat untuk obligasi dan *medium-term notes* (MTN)
b. Jasa Agen Pengelola Rekening Penampungan
c. Jasa Agen Pembayaran
d. Jasa Penampungan Dana IPO
e. Jasa Agen Penjaminan

BNI selaku Wali Amanat, telah mengelola 117 emisi dengan nilai emisi (obligasi dan MTN) sebesar Rp26.250.424.706.259 (nilai penuh) pada tanggal 31 Desember 2025 dan 117 emisi dengan nilai emisi (obligasi dan MTN) sebesar Rp25.814.067 pada tanggal 31 Desember 2024 (tidak diaudit).

***55. OTHER ACTIVITIES** (continued)*

***Custodian Services** (continued)*

As of 31 December 2025 and 2024, BNI's custodians operations has 237 customers and 173 customers (unaudited), respectively. The customers are primarily pension funds, insurance companies, banks, foundations, securities companies, mutual funds, other institutions/legal entities and individual customers with total portfolio value as of 31 December 2025 and 2024 of Rp302,082,876,185,464 (in full amount) and Rp282,093,689,329,744 (in full amount) respectively.

BNI carries insurance on custodian services against potential losses from safekeeping and transit of securities in accordance with OJK, previously Bapepam and LK regulation.

Trust Operations

BNI has obtained the operating license for trustee services based on Decision Letter of Capital Market and Financial Institutions Supervisory Agency No. 01/STTD-WA/PM/1996 dated 27 March 1996. The Trustee Services Business (TSB) provides a full range of the following services:

a. Trustee for bond and medium-term notes (MTN)
b. Escrow Account Agent
c. Paying Agent
d. Initial Public Offering / IPO Receiving Bank
e. Security Agent

BNI as a Trustee, has 117 bonds and MTN issued amounting to Rp26,250,424,706,259 (full amount) as of 31 December 2025 and 117 bonds and MTN issued amounting to Rp25,814,067 as of 31 December 2024 (unaudited).

56. KREDIT KELOLAAN

BNI mengelola dana yang langsung dikeluarkan oleh Pemerintah Republik Indonesia (didanai oleh kreditur luar negeri) yang ditujukan kepada penerima pinjaman untuk keperluan pembiayaan proyek tertentu. Penerima pinjaman ini telah disetujui oleh Pemerintah Republik Indonesia. Pembayaran yang diterima oleh BNI dari penerima pinjaman dikembalikan lagi ke Pemerintah. BNI tidak menanggung risiko kredit atas transaksi-transaksi tersebut. Pinjaman tersebut bukan merupakan aset BNI dan dana yang diterima dari Pemerintah Republik Indonesia bukan merupakan liabilitas BNI. Pinjaman tersebut tidak dibukukan dalam laporan keuangan konsolidasian BNI. BNI memperoleh pendapatan atas pengelolaan pinjaman tersebut sebesar 0,25% dari rata-rata saldo baki debet pinjaman dalam mata uang Rupiah dan 0,15% dari rata-rata saldo baki debet pinjaman dalam mata uang Dolar Amerika Serikat.

Jumlah kredit yang dikelola oleh BNI atas nama Pemerintah tersebut pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

56. CHANNELLING LOANS

BNI administers loans directly disbursed by the Government of the Republic of Indonesia (financed by overseas creditors) to the borrowers of certain specified projects. These borrowers are approved by the Government of the Republic of Indonesia. Payments received by BNI from borrowers are remitted back to the Government. BNI bears no credit risk on these transactions. These loans are not the assets of BNI and funds received from the Government of Republic of Indonesia are not the liabilities of BNI. These loans are not recognised in BNI's consolidated financial statements. BNI receives fees for administering the loans of 0.25% from the average of loans outstanding balance in Rupiah and 0.15% of the average of loan outstanding balance in United States Dollar.

Following is the outstanding loans balance administered by BNI on behalf of the Government as of 31 December 2025 and 2024:

	2025	2024	
Sektor			***Sector***
Listrik, gas dan air	4,098	4,098	*Electricity, gas and water*
Pertanian	2,876	2,876	*Agriculture*
Pengangkutan, pergudangan dan komunikasi	2,747	2,747	*Transportation, warehouse and communications*
Perdagangan, restoran dan hotel	2,258	2,258	*Trading, restaurant and hotel*
Jasa pelayanan sosial	1,876	1,876	*Social services*
Jasa dunia usaha	1,680	1,680	*Business services*
Perindustrian	1,125	1,125	*Manufacturing*
Konstruksi	6	6	*Construction*
Lain-lain	9,396	9,399	*Others*
Total	**26,062**	**26,065**	***Total***

57. TAMBAHAN INFORMASI ARUS KAS

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas konsolidasian adalah sebagai berikut:

57. SUPPLEMENTARY CASH FLOW INFORMATION

Changes in liabilities arising from financing activities in the consolidated cash flow statement are as follows:

	1 Januari/ *January* 2025	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember / *December* 2025	
Pinjaman yang diterima	42,931,444	(5,285,042)	1,393,985	39,040,387	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	15,890,945	(8,785,704)	146,140	7,251,381	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	12,974,497	1,013,486	265,207	14,253,190	*Securities issued*
Efek-efek subordinasi	17,699,184	-	640,804	18,339,988	*Subordinated securities*
Pembayaran dividen	-	(13,951,339)	13,951,339	-	*Payment of dividends*
Pembayaran liabilitas sewa	1,004,213	(547,116)	282,435	739,532	*Payment of lease liabilities*
	90,500,283	**(27,555,715)**	**16,679,910**	**79,624,478**	

	1 Januari/ *January* 2024	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember/ *December* 2024	
Pinjaman yang diterima	30,949,608	12,424,936	(443,100)	42,931,444	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	6,891,177	8,430,894	568,874	15,890,945	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	4,893,357	8,187,500	(106,360)	12,974,497	*Securities issued*
Efek-efek subordinasi	16,928,731	-	770,453	17,699,184	*Subordinated securities*
Saham treasuri	(179,960)	-	179,960	-	*Treasury shares*
Pembayaran dividen	-	(10,454,738)	10,454,738	-	*Payment of dividends*
Pembayaran liabilitas sewa	1,287,369	(870,149)	586,993	1,004,213	*Payment of lease liabilities*
	60,770,282	**17,718,443**	**12,011,558**	**90,500,283**	

58. ANALISIS KUALITAS KREDIT

Pengukuran Kerugian Kredit Ekspektasian

Peningkatan Risiko Kredit Secara Signifikan

Ketika menentukan apakah risiko gagal bayar pada instrumen keuangan telah meningkat secara signifikan sejak pengakuan awal, Bank mempertimbangkan informasi yang wajar dan terdukung, serta relevan yang tersedia tanpa biaya atau upaya yang berlebihan. Hal tersebut mencakup informasi dan analisa kuantitatif dan kualitatif, berdasarkan pada pengalaman historis dan penilaian pakar kredit dan termasuk perkiraan masa depan (*forward-looking*).

Tujuan dari penilaian ini adalah untuk mengidentifikasi apakah peningkatan risiko kredit secara signifikan atas eksposur telah terjadi dengan membandingkan:

- *Probability of default* (PD) atas umur tersisa pada tanggal pelaporan; dengan
- *Probability of default* (PD) atas umur tersisa yang diestimasi pada saat pengakuan awal eksposur (jika relevan, disesuaikan dengan perubahan ekspektasi pembayaran di muka).

58. CREDIT QUALITY ANALYSIS

Measurement of Expected Credit Losses

Significant Increase in Credit Risk

When determining whether the risk of default on financial instruments has increased significantly since initial recognition, the Bank considers reasonable and supported relevant information that is available without excessive costs or efforts. This includes quantitative and qualitative information and analysis, based on historical experience and credit expert assessments and including forward-looking estimates.

The purpose of this assessment is to identify whether a significant increase in credit risk of exposure has occurred by comparing:

- *Probability of default (PD) for the remaining age at the reporting date; with*
- *Probability of default (PD) for the estimated remaining age at initial recognition of the exposure (if relevant, adjusted for change in expectations of prepayment).*

58. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Peningkatan Risiko Kredit Secara Signifikan (lanjutan)

Bank menggunakan kriteria berikut dalam menentukan apakah peningkatan risiko kredit secara signifikan atas eksposur telah terjadi:

- pengujian kuantitatif berdasarkan perubahan *probability of default* (PD);
- indikator kualitatif;
- tertunggak lebih dari 30 hari.

Credit Risk Grades

Bank mengalokasikan setiap eksposur ke *credit risk grades* berdasarkan variasi data yang ditentukan dapat memprediksi risiko gagal bayar dan menerapkan pengalaman atas kredit. *Credit risk grades* ditetapkan menggunakan faktor kualitatif dan kuantitatif yang dapat mengindikasikan risiko gagal bayar. Faktor-faktor ini bervariasi tergantung pada sifat eksposur dan jenis peminjam.

Credit risk grades ditetapkan dan dikalibrasi sedemikian rupa sehingga risiko terjadinya gagal bayar meningkat secara eksponensial seiring dengan penurunan *rating* risiko kredit, sebagai contoh, selisih antara *credit risk rating grades* 1 dan 2 lebih kecil dari pada selisih antara *credit risk rating grades* 2 dan 3.

Setiap eksposur dialokasikan ke *credit risk grades* pada pengakuan awal berdasarkan informasi yang tersedia tentang peminjam. Eksposur ini dipantau secara berkelanjutan, dan dapat mengakibatkan eksposur dipindahkan ke *credit risk grades* yang berbeda. Pemantauan biasanya menggunakan data berikut: laporan keuangan, penggunaan fasilitas kredit, dan estimasi kondisi ekonomi.

Penentuan Struktur *Probability of Default*

Credit risk grades adalah *input* utama dalam penentuan struktur PD *term structure* atas eksposur. Bank mengumpulkan informasi kinerja dan gagal bayar tentang eksposur risiko kredit yang dianalisa berdasarkan yurisdiksi atau wilayah dan menurut jenis produk dan peminjam serta penilaian risiko kredit. Untuk beberapa portofolio, informasi yang dibeli dari penilai kredit eksternal juga digunakan.

***58. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

***Significant Increase in Credit Risk** (continued)*

The Bank use these criteria for determining whether there has been a significant increase in credit:

- *quantitative test based on movement in probability of default (PD);*
- *qualitative indicators;*
- *a backstop of 30 days past due.*

Credit Risk Grades

The Bank allocated each exposure to credit risk grades based on a variety of data that is determined to predict the risk of default and apply credit experience judgement. Credit risk grades are determined using qualitative and quantitative factors that can indicate the risk of default. These factors vary depending on the nature of the exposure and the type of borrower.

Credit risk grades are determined and calibrated in such a way that the risk of default is increasing exponentially as credit risk rating decreases, for example, the difference between credit risk rating grades 1 and 2 is smaller than the difference between credit risk rating grades 2 and 3.

Each exposure is allocated to credit risk grades at initial recognition based on available information about the borrower. This exposure is monitored on an ongoing basis, and can result in the exposure being transferred to different credit risk grades. Monitoring usually uses the following data: financial statements, use of credit facilities and estimates of economic conditions.

Determination of the Probability of Default Structure

Credit risk grades are the main input in determining the PD term structure of the exposure. The Bank collects performance and default information about credit risk exposures, which are analyzed by jurisdiction or region and by product and borrower type as well as credit risk assessment. For some portfolios, information purchased from external credit analyst is also used.

58. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Penentuan Struktur *Probability of Default* (lanjutan)

Bank menggunakan model statistik untuk menganalisa data yang dikumpulkan dan menghasilkan perkiraan *probability of default* (PD) atas umur tersisa dan bagaimana hal ini diperkirakan akan berubah sebagai akibat dari berlalunya waktu.

Analisa ini mencakup identifikasi dan kalibrasi hubungan antara perubahan tingkat gagal bayar dan perubahan dalam faktor-faktor makro ekonomi utama serta analisa mendalam tentang dampak faktor-faktor lain tertentu (misalkan restrukturisasi) pada risiko gagal bayar. Untuk sebagian besar eksposur, indikator makro ekonomi utama meliputi: pertumbuhan PDB, suku bunga acuan, dan tingkat pengangguran. Untuk eksposur pada industri dan/atau wilayah tertentu, analisa dapat mencakup harga komoditas dan/atau harga properti yang relevan.

Penentuan Terjadinya Peningkatan Risiko Kredit Secara Signifikan

Bank mempergunakan sejumlah kriteria untuk menentukan telah terjadi peningkatan risiko kredit secara signifikan.

Kriteria tersebut ditetapkan menggunakan faktor kuantitatif dan kualitatif termasuk penentuan berdasarkan status hari tunggakan yang dapat mengindikasikan telah terjadi peningkatan risiko kredit yang signifikan terhadap saat awal diberikan.

Bank dimungkinkan menggunakan penilaian dari analis kredit dan jika memungkinkan, pengalaman historis yang relevan, dalam menentukan bahwa eksposur mungkin saja telah mengalami peningkatan risiko kredit yang signifikan berdasarkan indikator kualitatif tertentu yang dianggap dapat mengindikasikan hal tersebut dimana pengaruhnya mungkin belum sepenuhnya tercermin pada saat dilakukan analisis kuantitatif secara komprehensif dan tepat waktu.

***58. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

***Determination of the Probability of Default Structure** (continued)*

The Bank uses a statistical model to analyze the collected data and produce an estimate of the probability of default (PD) for the remaining life and how this is expected to change as a result of the passage of time.

This analysis includes the identification and calibration of the relationship between changes in default rates and changes in key macroeconomic factors as well as an in-depth analysis of the impact of other certain factors (e.g. restructuring) on the risk of default. For most exposures, the main macroeconomic indicators include: GDP growth, benchmark interest rates, and the unemployment rate. For exposures in certain industries and/or regions, the analysis can include commodity prices and/or relevant property prices.

Determination of Significant Increase in Credit Risk

The Bank uses several criteria for determining that credit risk has increased significantly.

The criteria are determined using qualitative and quantitative factors including determination based on arrear day status that can indicate significant increase in credit risk since initial recognition.

The Bank can also use the judgment of credit analysts and, if possible, relevant historical experience, in determining that the exposure may have experienced a significant increase in credit risk based on certain qualitative indicators that are considered to indicate this and their effects may not be fully reflected in quantitative analysis in a comprehensive manner on a timely manner.

58. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Penentuan Terjadinya Peningkatan Risiko Kredit Secara Signifikan (lanjutan)

Bank menentukan bahwa peningkatan risiko kredit secara signifikan belum terjadi apabila masih kurang dari 30 hari tunggakan. Hari tunggakan ditentukan dengan menghitung jumlah hari sejak tanggal jatuh tempo awal dimana pembayaran penuh belum diterima. Tanggal jatuh tempo ditentukan tanpa mempertimbangkan masa tenggang yang mungkin tersedia bagi peminjam.

Bank memantau efektivitas kriteria yang digunakan dalam mengidentifikasi peningkatan risiko kredit yang signifikan dengan cara reviu berkala.

Modifikasi Aset Keuangan

Ketentuan kontraktual pinjaman dapat dimodifikasi untuk beberapa alasan, termasuk perubahan kondisi pasar, retensi pelanggan dan faktor-faktor lain yang tidak terkait dengan penurunan kredit saat ini. Pinjaman yang ketentuan kontraktualnya dimodifikasi dapat menyebabkan pinjaman awal dihentikan pengakuannya dan pinjaman hasil modifikasi diakui sebagai pinjaman baru pada nilai wajar.

Ketika ketentuan kontraktual pinjaman dimodifikasi dan tidak mengakibatkan penghentian pengakuan, penentuan terjadinya peningkatan risiko kredit secara signifikan dilakukan dengan cara membandingkan:
- Sisa PD sepanjang umur pada tanggal pelaporan berdasarkan ketentuan yang dimodifikasi; dengan
- Sisa PD sepanjang umur yang diestimasi berdasarkan data pada saat pengakuan awal dan ketentuan kontraktual awal.

Definisi Gagal Bayar *(Default)*

Grup menganggap aset keuangan dalam keadaan *default*/gagal bayar ketika:
- Debitur tidak mungkin membayar kewajiban kreditnya kepada secara penuh, tanpa bantuan (*recourse*) dari Grup; atau
- Debitur telah melewati jatuh tempo lebih dari 90 hari atas kewajiban kredit material apapun kepada Grup.

***58. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

***Determination of Significant Increase in Credit Risk** (continued)*

The Bank determines that a significant increase in credit risk has not occurred if it is still less than 30 days in arrears. Arrear days are determined by counting the number of days from the initial due date where full payment has not been received. The due date is determined without considering the grace period that might be available to the borrower.

The Bank monitors the effectiveness of the criteria used in identifying significant increases in credit risk by periodic review.

Modification of Financial Assets

Loan contractual terms can be modified for a number of reasons, including changes in market conditions, customer retention and other factors not related to the current credit decline. Loans with modified contractual terms can cause the initial loan to be derecognized and recognized the modified loan as a new loan at fair value.

When the contractual terms of the loan are modified and do not result in termination of recognition, determining the occurrence of a significant increase in credit risk is done by comparing:
- *PD remaining life at reporting date based on modified provision; with*
- *Residual PD throughout the estimated age based on data at initial recognition and initial contractual provisions.*

Definition of Failed Payment (Default)

The Group considers financial assets as default when:
- *The debtor is unlikely to pay its credit obligation in full, without assistance (recourse) from the Group; or*
- *The debtors have past due more than 90 days for any material credit obligations to the Group.*

58. ANALISIS KUALITAS KREDIT (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Definisi Gagal Bayar *(Default)* (lanjutan)

Dalam menilai apakah debitur dalam keadaan *default*/gagal bayar, Grup mempertimbangkan indikator berikut:
- Kualitatif seperti pelanggaran persyaratan perjanjian (*covenants*);
- Kuantitatif seperti status tunggakan; dan
- Berdasarkan data yang dikembangkan secara internal dan diperoleh dari sumber eksternal.

***Input*, Asumsi, dan Teknik yang Digunakan dalam Mengestimasi Penurunan Nilai**

Penggunaan informasi perkiraan masa depan *(forward-looking)*

Grup menggunakan informasi *forward-looking* dalam menilai apakah telah terjadinya peningkatan risiko kredit secara signifikan dan pengukuran kerugian kredit ekspektasian. Berdasarkan saran dari Komite Manajemen Risiko, pakar ekonomi dan pertimbangan berbagai informasi aktual dan perkiraan eksternal, Grup merumuskan pandangan dasar (*base case*) tentang pergerakan variabel ekonomi yang relevan di masa depan serta perkiraan skenario lain yang mungkin terjadi. Proses ini meliputi pengembangan dua atau lebih skenario ekonomi tambahan dan mempertimbangkan probabilitas relatif dari keluaran (*output*) yang mungkin. Informasi eksternal mencakup data ekonomi dan perkiraan yang diterbitkan oleh, seperti badan pemerintah dan analis sektor swasta dan akademisi terpilih.

Pandangan dasar (*base case*) mencerminkan keluaran dengan probabilitas yang paling tinggi dan digunakan dalam perencanaan strategis dan anggaran. Skenario yang lain, mencerminkan keluaran yang lebih optimis dan keluaran yang lebih pesimis.

Pengukuran Kerugian Kredit Ekspektasian

Input utama dalam pengukuran kerugian kredit ekspektasian adalah variabel berikut:
- *Probability of default* (PD);
- *Loss of given default* (LGD);
- *Exposure at default* (EAD).

***58. CREDIT QUALITY ANALYSIS** (continued)*

***Measurement of Expected Credit Losses** (continued)*

***Definition of Failed Payment (Default)** (continued)*

In assessing whether a debtor is in default, the Group considers the following indicators:

- *Qualitative such as violations of the terms of the agreement (covenants);*
- *Quantitative such as arrears status; and*
- *Based on data developed internally and obtained from external sources.*

Inputs, Assumptions, and Techniques Used in Estimating Impairment

Use of forward-looking information

The Group uses forward-looking information in assessing whether there has been a significant increase in credit risk and measurement of expected credit losses. Based on advice from the Risk Management Committee, economists and consideration of various actual information and external forecast, the Group formulated a base case for the movement of relevant economic variables in future as well as forecasts of other possible scenarios. This process involves developing two or more additional economic scenarios and considering the relative probabilities of the possible outputs. External information includes economic data and estimation published by, such as government agencies and selected private sector analysts and academics.

The base case reflects the output with the highest probability and is used in strategic planning and budgeting. Another scenario, reflects more optimistic outputs and more pessimistic outputs.

Measurement of Expected Credit Loss

The main inputs in measuring expected credit loss are the following variables:
- *Probability of default (PD);*
- *Loss of given default (LGD);*
- *Exposure at default (EAD).*

58. ANALISIS KUALITAS KREDIT (lanjutan)

***Input*, Asumsi, dan Teknik yang Digunakan dalam Mengestimasi Penurunan Nilai** (lanjutan)

Pengukuran Kerugian Kredit Ekspektasian (lanjutan)

Parameter ini umumnya berasal dari model statistik yang dikembangkan secara internal dan data historis lainnya. Parameter ini disesuaikan untuk mencerminkan informasi *forward-looking*.

Estimasi PD adalah estimasi pada tanggal tertentu, yang dihitung berdasarkan model peringkat statistik, dan dinilai menggunakan rating yang disesuaikan dengan berbagai kategori dari debitur dan eksposur untuk segmen debitur Korporasi dan Menengah. Sedangkan untuk segmen Kecil dan Konsumer, estimasi PD dinilai menggunakan bucket umur tunggakan. Model statistik ini didasarkan pada data yang disusun secara internal yang terdiri dari faktor kuantitatif dan kualitatif.

LGD adalah besarnya kerugian jika terjadi gagal bayar. Parameter LGD diestimasi secara historis berdasarkan tingkat pemulihan atas klaim terhadap debitur yang gagal bayar. Model LGD mempertimbangkan struktur, jaminan, senioritas klaim, industri debitur, dan biaya pemulihan setiap jaminan yang merupakan bagian integral dari aset keuangan.

EAD merepresentasikan estimasi eksposur jika terjadi gagal bayar. EAD suatu aset keuangan adalah jumlah tercatat bruto. Untuk komitmen pinjaman dan jaminan keuangan, EAD mencakup jumlah yang telah ditarik, serta jumlah potensial di masa depan yang akan ditarik, yang diestimasi berdasarkan pengamatan historis dan perkiraan berwawasan ke depan (*forward-looking*).

Ketika pemodelan parameter dilakukan secara kolektif, instrumen keuangan dikelompokkan berdasarkan kesamaan karakteristik risiko yang meliputi:
- jenis instrumen;
- peringkat risiko kredit;
- jenis agunan;
- tanggal pengakuan awal;
- sisa waktu jatuh tempo;
- industri; dan
- lokasi geografis debitur.

***58. CREDIT QUALITY ANALYSIS** (continued)*

***Inputs, Assumptions, and Techniques Used in Estimating Impairment** (continued)*

***Measurement of Expected Credit Loss** (continued)*

These parameters generally come from statistical models that are developed internally and other historical data. This parameter is adjusted to reflect forward-looking information.

The PD estimation is an assessment for a certain date, calculated based on a statistical rating model, and evaluated using ratings adjusted for various categories of debtors and exposures for the Corporate and Middle segments. Meanwhile, for the Retail and Consumer segments, the PD estimation is evaluated using day past due buckets. This statistical model is based on internally compiled data that consists of quantitative and qualitative factors.

LGD is the amount of loss if there is a default. LGD parameters are historically estimated based on the level of recovery of claims against debtors who default. The LGD model considers the structure, collateral, claim seniority, the debtor industry, and the cost of recovering any collateral that is an integral part of a financial asset.

EAD represents the estimated exposure in case of default. EAD of a financial asset is the gross carrying amount. For loan commitments and financial guarantees, EAD includes the amount that has been withdrawn, as well as potential future amounts to be withdrawn, which are estimated based on historical observations and forward-looking estimates.

When parameter modelling is done collectively, financial instruments are grouped according to the similarity of risk characteristics which include:

- *type of instrument;*
- *credit risk rating;*
- *type of collateral;*
- *date of initial recognition;*
- *remaining due date;*
- *industry; and*
- *debtor's geographical location.*

59. BEBAN TANGGUNG JAWAB SOSIAL DAN LINGKUNGAN (TJSL)

Beban TJSL yang telah dibebankan pada laporan laba rugi untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 adalah masing-masing sebesar Rp121.505 dan Rp134.755.

59. TANGGUNG JAWAB SOSIAL DAN LINGKUNGAN (TJSL) EXPENSE

TJSL expense that was charged to profit or loss amounted to Rp121,505 and Rp134,755 for the year ended 31 December 2025 and 2024, respectively.

60. PENYAJIAN KEMBALI LAPORAN KEUANGAN KONSOLIDASIAN

Pada tanggal 1 Januari 2025, Bank mengadopsi PSAK 117 'Kontrak Asuransi' secara retrospektif sesuai dengan persyaratan standar tersebut, dengan perbandingan yang telah disajikan kembali dari tanggal transisi yaitu tanggal 1 Januari 2024.

Tabel-tabel di bawah ini menunjukkan dampak penyajian kembali pada transisi terhadap neraca konsolidasian Bank per 1 Januari 2024, laporan laba rugi konsolidasian Bank dan laporan laba rugi komprehensif konsolidasian Bank serta laporan arus kas konsolidasian Bank untuk tahun yang berakhir pada 31 Desember 2024.

Laporan posisi keuangan konsolidasian pada tanggal 1 Januari 2024

60. RESTATEMENT OF THE CONSOLIDATED FINANCIAL STATEMENTS

On 1 January 2025 the Bank adopted SFAS 117 'Insurance Contracts' and as required by the standard applied the requirements retrospectively with comparatives restated from the transition date, 1 January 2024.

The tables below provide the transition restatement impact on the Bank's consolidated balance sheet as at 1 January 2024, the Bank's consolidated income statement and the Bank's consolidated statement of comprehensive income as well as the Bank's consolidated statement of cash flows for the year ended 31 December 2024.

Consolidated statement of financial position as at 1 January 2024

	Sebelum disajikan kembali/ *Before restatement*	**Penyesuaian/ *Adjustments***	**Setelah disajikan kembali/ *After restatement***	
Aset kontrak asuransi dan reasuransi	-	69,368	69,368	*Insurance and reinsurance contract assets*
Aset lain-lain - bersih	16,972,197	(20,379)	16,951,818	*Other assets - net*
Aset pajak tangguhan - bersih	7,440,618	207,807	7,648,425	*Deferred tax assets - net*
	24,412,815	**256,796**	**24,669,611**	
Total aset	**1,086,663,986**	**256,796**	**1,086,920,782**	***Total assets***
Liabilitas kontrak asuransi	-	17,868,128	17,868,128	*Insurance contract liabilities*
Liabilitas kontrak reasuransi	-	107	107	*Reinsurance contract liabilities*
Liabilitas lain-lain	26,124,897	(16,842,165)	9,282,732	*Other liabilities*
	26,124,897	**1,026,070**	**27,150,967**	
Total liabilitas	**931,931,466**	**1,026,070**	**932,957,536**	***Total liabilities***
Keuntungan/(kerugian) yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	(896,178)	(45,011)	(941,189)	*Unrealised gain/(loss) on marketable securities and Government Bonds at fair value through other comprehensive income, net of tax*
Saldo laba Tidak ditentukan penggunaannya	104,457,102	(419,767)	104,037,335	*Retained earnings (deficit) Unappropriated –*
Kepentingan non-pengendali	4,601,506	(304,496)	4,297,010	*Non-controlling interest*
	108,162,430	**(769,274)**	**107,393,156**	
Jumlah ekuitas	**154,732,520**	**(769,274)**	**153,963,246**	***Total equity***

60. PENYAJIAN KEMBALI LAPORAN KEUANGAN KONSOLIDASIAN (lanjutan)

Tabel-tabel di bawah ini menunjukkan dampak penyajian kembali pada transisi terhadap neraca konsolidasian Bank per 1 Januari 2024, laporan laba rugi konsolidasian Bank dan laporan laba rugi komprehensif konsolidasian Bank serta laporan arus kas konsolidasian Bank untuk tahun yang berakhir pada 31 Desember 2024. (lanjutan)

Laporan posisi keuangan konsolidasian pada tanggal 31 Desember 2024

***60. RESTATEMENT OF THE CONSOLIDATED FINANCIAL STATEMENTS** (continued)*

The tables below provide the transition restatement impact on the Bank's consolidated balance sheet as at 1 January 2024, the Bank's consolidated income statement and the Bank's consolidated statement of comprehensive income as well as the Bank's consolidated statement of cash flows for the year ended 31 December 2024. (continued)

Consolidated statement of financial position as at 31 December 2024

	Sebelum disajikan kembali/ ***Before restatement***	**Penyesuaian/** ***Adjustments***	**Setelah disajikan kembali/** ***After restatement***	
Aset kontrak asuransi dan reasuransi	-	99,181	99,181	*Insurance and reinsurance contract assets*
Aset lain-lain - bersih	14,107,067	28,354	14,135,421	*Other assets - net*
Aset pajak tangguhan - bersih	6,949,596	195,690	7,145,286	*Deferred tax assets – net*
	21,056,663	**323,225**	**21,379,888**	
Total aset	**1,129,805,637**	**323,225**	**1,130,128,862**	***Total assets***
Liabilitas kontrak asuransi	-	19,203,101	19,203,101	*Insurance contract liabilities*
Liabilitas kontrak reasuransi	-	6,575	6,575	*Reinsurance contract liabilities*
Liabilitas lain-lain	26,563,501	(18,247,905)	8,315,596	*Other liabilities*
	26,563,501	**961,771**	**27,525,272**	
Total liabilitas	**962,619,084**	**961,771**	**963,580,855**	***Total liabilities***
Keuntungan/(kerugian) yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	(1,465,059)	33,426	(1,431,633)	*Unrealised gain/(loss) on marketable securities and Government Bonds at fair value through comprehensive income income net of tax,*
Saldo laba				*Retained earnings (deficit)*
Tidak ditentukan penggunaannya	115,885,182	(419,767)	115,465,415	*Unappropriated –*
Kepentingan non-pengendali	4,728,972	(252,205)	4,476,767	*Non-controlling interest*
	119,149,095	**(638,546)**	**118,510,549**	
Jumlah ekuitas	**167,186,553**	**(638,546)**	**166,548,007**	***Total equity***

60. PENYAJIAN KEMBALI LAPORAN KEUANGAN KONSOLIDASIAN (lanjutan)

Tabel-tabel di bawah ini menunjukkan dampak penyajian kembali pada transisi terhadap neraca konsolidasian Bank per 1 Januari 2024, laporan laba rugi konsolidasian Bank dan laporan laba rugi komprehensif konsolidasian Bank serta laporan arus kas konsolidasian Bank untuk tahun yang berakhir pada 31 Desember 2024. (lanjutan)

Laporan posisi laba rugi dan penghasilan komprehensif lain konsolidasian untuk tahun yang berakhir 31 Desember 2024:

60. RESTATEMENT OF THE CONSOLIDATED FINANCIAL STATEMENTS (continued)

The tables below provide the transition restatement impact on the Bank's consolidated balance sheet as at 1 January 2024, the Bank's consolidated income statement and the Bank's consolidated statement of comprehensive income as well as the Bank's consolidated statement of cash flows for the year ended 31 December 2024. (continued)

Consolidated statement of profit or loss and other comprehensive income for the year ended 31 December 2024:

	Sebelum disajikan kembali/ *Before restatement*	Penyesuaian/ *Adjustments*	Setelah disajikan kembali/ *After restatement*	
Pendapatan premi dan hasil investasi	6,741,317	(6,741,369)	(52)	*Premium income and investment return*
Beban klaim	(5,017,507)	5,015,755	(1,752)	*Claim expense*
Pendapatan premi dan hasil Investasi bersih	**1,723,810**	**(1,725,614)**	**(1,804)**	***Premium income and investment return***
Pendapatan asuransi	-	1,992,659	1,992,659	*Insurance income*
Beban asuransi	-	(1,535,674)	(1,535,674)	*Insurance expense*
Pendapatan (beban) asuransi - bersih	**-**	**456,985**	**456,985**	***Insurance income (expense) - net***
Pendapatan hasil investasi	-	1,255,915	1,255,915	*Investment return*
Beban asuransi dan keuangan bersih	-	(944,804)	(944,804)	*Net insurance finance expense*
Pendapatan asuransi dan hasil investasi - bersih	**-**	**768,096**	**768,096**	***Net insurance and investment result***
Total pendapatan operasional lainnya	**22,310,905**	**338,274**	**22,649,179**	***Total other operating income***
Total beban operasional lainnya	**(29,688,445)**	**576,219**	**(29,112,226)**	***Total other operating expenses***
Laba sebelum beban pajak	**26,580,458**	**(11,367)**	**26,569,091**	***Income before tax expenses***
Beban pajak				***Tax expenses***
Kini	(4,495,531)	-	(4,495,531)	*Current*
Tangguhan	(415,530)	11,367	(404,163)	*Deferred*
Total beban pajak	(4,911,061)	11,367	(4,899,694)	*Total tax expenses*
Laba bersih	**21,669,397**	**-**	**21,669,397**	***Net income***
Total laba komprehensif tahun berjalan	**22,666,338**	**33,570**	**22,699,908**	***Total comprehensive income for the year ended***

60. PENYAJIAN KEMBALI LAPORAN KEUANGAN KONSOLIDASIAN (lanjutan)

Tabel-tabel di bawah ini menunjukkan dampak penyajian kembali pada transisi terhadap neraca konsolidasian Bank per 1 Januari 2024, laporan laba rugi konsolidasian Bank dan laporan laba rugi komprehensif konsolidasian Bank serta laporan arus kas konsolidasian Bank untuk tahun yang berakhir pada 31 Desember 2024. (lanjutan)

Laporan arus kas konsolidasian untuk tahun yang berakhir 31 Desember 2024:

***60. RESTATEMENT OF THE CONSOLIDATED FINANCIAL STATEMENTS** (continued)*

The tables below provide the transition restatement impact on the Bank's consolidated balance sheet as at 1 January 2024, the Bank's consolidated income statement and the Bank's consolidated statement of comprehensive income as well as the Bank's consolidated statement of cash flows for the year ended 31 December 2024. (continued)

Consolidated statement of cash flows for the year ended 31 December 2024:

	Sebelum disajikan kembali/ ***Before restatement***	**Penyesuaian/** ***Adjustments***	**Setelah disajikan kembali/** ***After restatement***	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan pendapatan bunga	66,149,661	-	66,149,661)	*Receipts from interest income*
Pembayaran beban bunga	(26,031,790)	-	(26,031,790)	*Payments of interest expense*
Pendapatan premi dan hasil investasi	6,741,317	(6,741,369)	(52)	*Premium and investment income*
Beban klaim	(5,017,507)	5,015,755	(1,752)	*Claim expense*
Penerimaan kas dari aktivitas asuransi	-	5,481,495	5,481,495	*Cash received from insurance activity*
Pembayaran kas dari aktivitas asuransi	-	(4,453,367)	(4,453,367)	*Cash paid from insurance activity*
Pendapatan hasil investasi	-	1,455,232	1,455,232	*Investment return*
Pendapatan operasional lainnya	26,436,787	(954,420)	25,482,367	*Other operating income*
Beban operasional lainnya	(28,632,962)	2,865,176	(25,767,786)	*Other operating expenses*
Pendapatan (beban) bukan operasional - bersih	(35,455)	31,658	(3,797)	*Non-operating income (expenses) - net*
Beban klaim	(4,349,809)	-	(4,349,809)	*Claim expense*
Arus kas sebelum perubahan dalam aset dan liabilitas operasi	**35,260,242**	**2,700,160**	**37,960,402**	***Cash flows before changes in operating assets and liabilities***
Penurunan dalam aset dan liabilitas operasi	(63,217,913)	(2,700,160)	(63,217,913)	*Decrease in operating assets and liabilities*
Kas bersih digunakan untuk aktivitas operasi	**(63,217,913)**	**-**	**(63,217,913)**	***Net cash used in operating activities***

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia:

a. Giro pada Bank Indonesia

Bank dipersyaratkan untuk memiliki Giro Wajib Minimum (GWM) dalam mata uang Rupiah dalam kegiatannya sebagai bank umum, serta GWM dalam mata uang asing dalam kegiatannya melakukan transaksi mata uang asing.

Pada tanggal 31 Desember 2025 dan 31 Desember 2024, Giro Wajib Minimum Bank telah sesuai dengan Peraturan Bank Indonesia (PBI) No. 24/4/PBI/2022 tanggal 1 Maret 2022 tentang Giro Wajib Minimum Bank Umum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional dan Peraturan Anggota Dewan Gubernur (PADG) No. 8 tahun 2025 tanggal 27 Maret 2025, yang masing-masing sebesar:

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards:

a. Current accounts with Bank Indonesia

The Bank is required to maintain Minimum Statutory Reserves (GWM) in Rupiah for conventional bank and Minimum Statutory Reserves in foreign currencies for foreign exchange transactions.

As of 31 December 2025 and 2024, the Bank's Minimum Statutory Reserve has complied with Bank Indonesia Regulation (PBI) No. 24/4/PBI/2022 dated 1 March 2022 concerning Minimum Statutory Reserve of Commercial Banks with BI in Rupiah and Foreign Currency and Members of the Board of Governors (PADG) Regulation No. 8/2025 dated 27 March 2025, which are as follows:

	2025	2024	
Rupiah			*Rupiah*
- GWM Primer	3.90%	6.40%	*Primary Statutory Reserve -*
Harian*)	0.00%	0.00%	*Daily*)
Rata-rata*)	3.90%	6.40%	*Average*)
- PLM**)	4.00%	5.00%	*MPLB*) -*
Mata uang asing	4.00%	4.00%	*Foreign Currencies*
Harian	2.00%	2.00%	*Daily*
Rata-rata	2.00%	2.00%	*Average*

*) Berdasarkan PADG Nomor 8 Tahun 2025 tanggal 27 Maret 2025, Bank mendapatkan insentif berupa kelonggaran GWM dalam Rupiah pada 31 Desember 2025 sebesar 5,10% karena Bank melakukan penyediaan dana untuk kegiatan ekonomi tertentu dan inklusif. GWM dalam Rupiah yang harus dipenuhi Bank pada 31 Desember 2025 yang seharusnya sebesar 9,00% dengan ketentuan harian 0,00% dan rata-rata 9,00% menjadi sebesar 3,90% dengan ketentuan harian 0,00% dan rata-rata 3,90%.

**) Berdasarkan PADG Nomor 23 Tahun 2025 tanggal 20 Oktober 2025, kebijakan pemenuhan Penyangga Likuiditas Makroprudensial (PLM) ditetapkan sebesar 4,00%.

*) *Based on PADG No. 8/2025 dated 27 March 2025, Bank gets incentives in the form of relaxation of the Statutory Reserves in Rupiah on 31 December 2025 amounting to 5.10% because Bank provides funds for certain and inclusive economic activities. The Statutory Reserves in Rupiah that must be fulfilled by the Bank on 31 December 2025 which should be 9.00% with daily provisions of 0.00% and an average of 9.00% become 3.90% with daily provisions of 0.00% and an average of 3.90%.*

**) *Based on PADG No. 23/2025 dated 20 October 2025, the policy regarding fulfillment of Macroprudential Liquidity Buffer (MPLB) is set at 4.00%.*

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

a. Giro pada Bank Indonesia (lanjutan)

Giro Wajib Minimum (GWM) adalah simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia. Penyangga Likuiditas Makroprudensial (PLM) adalah cadangan minimum yang wajib dipelihara oleh Bank dalam bentuk Sertifikat Bank Indonesia (SBI), Sertifikat Deposito Bank Indonesia (SDBI), Sukuk Bank Indonesia (SukBI) dan/atau Surat Berharga Negara (SBN). Giro RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo Rekening Giro pada Bank Indonesia. Berdasarkan PADG No. 23/7/PADG/2021 tanggal 26 April 2021, besaran dan parameter yang digunakan dalam pemenuhan Giro RIM adalah batas bawah target sebesar 84% dan batas atas target sebesar 94% dengan Kewajiban Penyediaan Modal Minimum (KPMM) insentif sebesar 14%.

Rasio Giro Wajib Minimum untuk rekening Rupiah dan mata uang asing pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar:

	2025	2024	
Rupiah			*Rupiah*
- GWM Primer	6.38%	6.51%	*Primary Statutory Reserve -*
Harian	0.00%	0.00%	*Daily*
Rata-rata	6.38%	6.51%	*Average*
- PLM	18.31%	14.77%	*MPLB -*
Mata uang asing	4.02%	4.01%	*Foreign currencies*
Harian	2.00%	2.00%	*Daily*
Rata-rata	2.02%	2.01%	*Average*

BNI telah memenuhi ketentuan Bank Indonesia tentang Giro Wajib Minimum pada tanggal 31 Desember 2025 dan 2024.

Pengungkapan lebih lanjut pada giro pada Bank Indonesia diungkapkan pada Catatan 5.

b. Giro pada bank lain

Berdasarkan kolektibilitas sesuai Peraturan OJK

Seluruh giro pada bank lain pada tanggal-tanggal 31 Desember 2025 dan 2024 diklasifikasikan lancar.

Pengungkapan lebih lanjut pada giro pada bank lain diungkapkan pada Catatan 6.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

a. Current accounts with Bank Indonesia *(continued)*

Minimum Statutory Reserve is a minimum reserve that should be maintained by the Bank in Current Accounts with Bank Indonesia. Macroprudential Liquidity Buffer (MPLB) is the minimum reserves that should be maintained by the Bank in the form of Bank Indonesia Certificates (SBI), Bank Indonesia Deposit Certificates (SDBI), Bank Indonesia Sukuk (SukBI), and/or Government Securities (SBN). RIM Current Account is an additional reserve that should be maintained by the Bank in the form of Current Accounts with Bank Indonesia. Based on PADG No. 23/7/PADG/2021 dated 26 April 2021, the amount and parameters used in fulfilling RIM Current Account are the lower target limit of 84% and the upper target limit of 94% with a Capital Adequacy Ratio (CAR) incentive of 1

The ratio of the Minimum Statutory Reserve requirement for its Rupiah and foreign currencies accounts as of 31 December 2025 and 2024, are as follows:

BNI has complied with the Bank Indonesia regulations regarding the Minimum Statutory Reserve as of 31 December 2025 and 2024.

The further disclosures on current accounts with Bank Indonesia are presented in Note 5.

b. Current accounts with other banks

By Financial Service Authority Rule collectibility

All current accounts with other banks as of 31 December 2025 and 2024 are classified as current.

The further disclosures on current accounts with other banks are presented in Note 6.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

c. Penempatan pada bank lain dan Bank Indonesia

Berdasarkan kolektibilitas sesuai Peraturan OJK

Seluruh penempatan pada bank lain dan Bank Indonesia pada tanggal-tanggal 31 Desember 2025 dan 2024 diklasifikasikan sebagai lancar.

Pengungkapan lebih lanjut pada penempatan pada bank lain dan Bank Indonesia diungkapkan pada Catatan 7.

c. Placements with other banks and Bank Indonesia

By Financial Service Authority Rule collectibility

All placements with other banks and Bank Indonesia as of 31 December 2025 and 2024 are classified as current.

The further disclosures on placement with other banks and Bank Indonesia are presented in Note 7.

d. Efek-efek

Berdasarkan kolektibilitas sesuai Peraturan OJK

d. Marketable securities

By Financial Service Authority Rule collectibility

	2025		2024		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	59,845,805	(20)	48,217,357	(273)	*Current*
Kurang lancar*)	245,568	-	316,989	-	*Substandard*)
	60,091,373	**(20)**	**48,534,346**	**(273)**	

*) Cadangan kerugian penurunan nilai pada efek-efek dengan klasifikasi nilai wajar melalui penghasilan komprehensif lain dicatat pada penghasilan komprehensif lain, karena nilai tercatatnya disajikan sebesar nilai wajarnya.

*) *Allowance for impairment losses on marketable securities classified as fair value through other comprehensive income is recorded in other comprehensive income, because the carrying value is presented at fair value.*

Pengungkapan lebih lanjut pada efek-efek diungkapkan pada Catatan 8.

The further disclosures on marketable securities are presented in Note 8.

e. Wesel ekspor dan tagihan lainnya

Berdasarkan kolektibilitas sesuai Peraturan OJK

e. Bills and other receivables

By Financial Service Authority Rule collectibility

	2025		2024		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	13,507,554	(67,675)	13,295,854	(52,828)	*Current*
Dalam perhatian khusus	13,254	(287)	-	-	*Special mention*
	13,520,808	**(67,962)**	**13,295,854**	**(52,828)**	

Pengungkapan lebih lanjut pada wesel ekspor dan tagihan lainnya diungkapkan pada Catatan 9.

The further disclosures on bills and other receivables are presented in Note 9.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

f. Tagihan akseptasi

f. Acceptance receivables

Berdasarkan kolektibilitas sesuai Peraturan OJK

By Financial Service Authority Rule collectibility

	2025		2024		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	19,566,978	(133,051)	15,966,466	(85,551)	*Current*
Dalam perhatian khusus	15,768	(935)	52,304	(7,698)	*Special mention*
	19,582,746	**(133,986)**	**16,018,770**	**(93,249)**	

Pengungkapan lebih lanjut pada tagihan akseptasi diungkapkan pada Catatan 10.

The further disclosures on acceptance receivables are presented in Note 10.

g. Tagihan dan liabilitas derivatif

g. Derivative receivables and payables

Berdasarkan hasil penelaahan dan evaluasi manajemen Bank, seluruh tagihan dan liabilitas derivatif pada tanggal 31 Desember 2025 dan 2024 digolongkan lancar.

Based on the Bank's management review and evaluation, all derivative receivables and payables as of 31 December 2025 and 2024 are classified as current.

Pengungkapan lebih lanjut pada tagihan dan liabilitas derivatif diungkapkan pada Catatan 11.

The further disclosures on derivative receivables and payables are presented in Note 11.

h. Pinjaman yang diberikan

h. Loans

Berdasarkan kolektibilitas sesuai Peraturan OJK

By Financial Service Authority Rule collectibility

	2025		2024		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Lancar	859,246,371	(13,339,947)	731,053,036	(12,730,108)	*Current*
Dalam perhatian khusus	22,911,736	(11,409,213)	29,565,938	(16,433,250)	*Special mention*
Kurang lancar	2,170,273	(1,136,419)	3,837,708	(2,248,250)	*Substandard*
Diragukan	2,402,569	(1,303,407)	2,137,988	(1,221,285)	*Doubtful*
Macet	12,799,742	(8,671,640)	9,277,108	(6,051,627)	*Loss*
	899,530,691	**(35,860,626)**	**775,871,778**	**(38,684,520)**	

Pengungkapan lebih lanjut pada pinjaman yang diberikan diungkapkan pada Catatan 12.

The further disclosures on loans are presented in Note 12.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

h. Pinjaman yang diberikan (lanjutan)

Pinjaman bermasalah dan cadangan kerugian penurunan nilai berdasarkan sektor ekonomi

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

h. Loans *(continued)*

Non-performing loans and allowance for impairment losses by economic sector

	2025		2024		
	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	Pokok/ *Principal*	Cadangan kerugian penurunan nilai/ *Allowance for impairment losses*	
Perindustrian	5,163,486	(3,495,793)	3,995,256	(2,403,477)	*Manufacturing*
Perdagangan, restoran dan hotel	4,904,348	(2,681,898)	4,251,648	(2,532,619)	*Trading, restaurants and hotels*
Pengangkutan, pergudangan dan komunikasi	1,100,242	(976,458)	1,649,543	(1,314,101)	*Transportation, warehousing and communications*
Konstruksi	512,160	(387,978)	429,856	(322,748)	*Construction*
Jasa pelayanan sosial	234,970	(132,928)	237,474	(127,783)	*Social services*
Pertanian	490,194	(301,322)	1,133,250	(734,684)	*Agriculture*
Jasa dunia usaha	339,035	(214,229)	556,739	(347,782)	*Business services*
Listrik, gas dan air	145,692	(80,130)	39,368	(25,659)	*Electricity, gas and water*
Pertambangan	109,010	(63,832)	66,177	(40,113)	*Mining*
Lain-lain	4,373,447	(2,776,898)	2,893,493	(1,672,196)	*Others*
	17,372,584	**(11,111,466)**	**15,252,804**	**(9,521,162)**	

Rasio kredit bermasalah BNI dan Entitas Anak secara *gross* (sebelum dikurangi cadangan kerugian penurunan nilai) sesuai dengan peraturan OJK yang berlaku pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar 1,93% dan 1,97% (rasio untuk BNI saja 1,93% dan 1,97% masing-masing pada tanggal 31 Desember 2025 dan 2024), sedangkan rasio kredit bermasalah BNI dan Entitas Anak secara neto pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar 0,70% dan 0,74% (rasio untuk BNI saja 0,70% dan 0,74% masing-masing pada tanggal 31 Desember 2025 dan 2024). Pengungkapan lebih lanjut pada pinjaman yang diberikan diungkapkan pada Catatan 12.

The non-performing loans ratio of BNI and Subsidiaries on a gross basis (before deducting the allowance for impairment losses) in accordance with the OJK regulation as of 31 December 2025 and 2024 were 1.93% and 1.97%, respectively (the ratios for BNI only were 1.93% and 1.97% as of 31 December 2025 and 2024, respectively), while the non-performing loans ratio of BNI and Subsidiaries on a net basis as of 31 December 2025 and 2024 were 0.70% and 0.74%, respectively (the ratios for BNI only were 0.70% and 0.74% as of 31 December 2025 and 2024, respectively). The further disclosures on loans are presented in Note 12.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

h. Pinjaman yang diberikan (lanjutan)

Pinjaman yang direstrukturisasi

Jumlah kredit yang telah direstrukturisasi dan dalam kategori kredit bermasalah berdasarkan peraturan OJK pada tanggal 31 Desember 2025 dan 2024 adalah masing-masing sebesar Rp8.312.216 dan Rp7.024.794.

Informasi pokok lainnya sehubungan dengan pinjaman yang diberikan

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat pelanggaran maupun pelampauan Batas Maksimum Pemberian Kredit (BMPK) kepada pihak berelasi dan pihak ketiga sesuai dengan peraturan yang ditetapkan Otoritas Jasa Keuangan.

i. Efek-efek yang dibeli dengan janji dijual kembali

Efek-efek yang dibeli dengan janji dijual kembali yang diungkapkan pada Catatan 14 diklasifikasikan berdasarkan kolektabilitas sesuai dengan peraturan OJK sebagai lancar.

j. Penyertaan saham - bersih

Penyertaan saham jangka panjang berdasarkan kolektibilitas sesuai Peraturan OJK adalah:

	2025	2024	
Lancar	652,311	637,280	*Current*
Total	652,311	637,280	*Total*

Pengungkapan lebih lanjut pada penyertaan saham - bersih diungkapkan pada Catatan 17.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

h. Loans *(continued)*

Restructured loans

The total of restructured loans that are categorised as non-performing loan based on OJK's regulation amounted to Rp8,312,216 and Rp7,024,794 as of 31 December 2025 and 2024, respectively.

Other significant information relating to loans

As of 31 December 2025 and 2024, there is neither any breach nor violation of Legal Lending Limit (LLL) to related parties and third parties as required by Regulation of Financial Services Authority.

i. Securities purchased under agreements to resell

Securities purchased under agreements to resell disclosed in Note 14 are classified by Financial Service Authority rule collectability as current.

j. Equity investments - net

The classification of long-term equity investments based on Financial Service Authority Rule collectibility are as follows:

The further disclosures on equity investment - net are presented in Note 17.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

k. Komitmen dan Kontinjensi

k. Commitments and Contingencies

Transaksi komitmen dan kontinjensi yang mempunyai risiko kredit berdasarkan kolektibilitas adalah sebagai berikut:

Commitments and contingent transactions that have credit risk by collectability are as follows:

	2025	2024	
Lancar	208,723,922	137,900,021	*Current*
Dalam perhatian khusus	1,999,170	2,128,420	*Special mention*
Kurang lancar	40,401	41,844	*Substandard*
Diragukan	103,907	54,329	*Doubtful*
Macet	461,915	831,833	*Loss*
	211,329,315	**140,956,447**	

Pengungkapan lebih lanjut pada komitmen dan kontinjensi diungkapkan pada Catatan 45.

The further disclosures on commitments and contingencies are presented in Note 45.

l. Manajemen risiko

l. Risk management

Penerapan Manajemen Risiko BNI berlandaskan pada regulasi nasional maupun internasional, meliputi Peraturan Otoritas Jasa Keuangan (POJK), Surat Edaran Otoritas Jasa Keuangan (SEOJK), Peraturan Bank Indonesia (PBI), Surat Edaran Bank Indonesia (SEBI), dan dokumen *Basel Committee on Banking Supervision* (BCBS).

The implementation of BNI Risk Management is based on national and international regulations, including Financial Services Authority Regulations (POJK), Financial Services Authority Circular Letters (SEOJK), Bank Indonesia Regulations (PBI), Bank Indonesia Circular Letters (SEBI), and Basel Committee on Banking Supervision (BCBS).

Beberapa regulasi yang terkait dengan Manajemen Risiko Bank adalah sebagai berikut:

Some of the regulations related to the Bank's Risk Management are as follows:

1. POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 dan SEOJK No. 34/SEOJK.03/2016 tanggal 1 September 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.

2. POJK No. 38/POJK.03/2017 tanggal 12 Juli 2017 dan SEOJK No. 43/SEOJK.03/2017 tanggal 19 Juli 2017 tentang Prinsip Kehati-hatian dan Laporan dalam rangka Penerapan Manajemen Risiko secara Konsolidasi bagi Bank yang Melakukan Pengendalian terhadap Perusahaan Anak.

3. POJK No. 17/POJK.03/2014 tanggal 19 November 2014 dan SEOJK No.14/ SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan.

1. *POJK No. 18/POJK.03/2016, dated 16 March 2016 and SEOJK No.34/SEOJK.03/2016 dated 1 September of 2016 concerning the Implementation of Risk Management for Commercial Banks.*

2. *POJK No. 38/POJK.03/2017 dated 12 July 2017 and SEOJK No. 43/SEOJK.03/2017 dated 19 July 2017 concerning Prudential Principles and Reports within the framework of the Application of Consolidated Risk Management for Banks that Control Subsidiaries.*

3. *POJK No. 17/POJK.03/2014 dated 19 November 2014 and SEOJK No. 14/ SEOJK.03/2015 dated 25 May 2015 concerning the Implementation of Integrated Risk Management for Financial Conglomerates.*

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

BNI juga melakukan pengelolaan terhadap risiko lainnya sesuai aturan Regulator, yaitu (i) risiko hukum untuk mengurangi kemungkinan kerugian dari tuntutan hukum atau kelemahan aspek yuridis seperti ketiadaan peraturan perundang-undangan yang mendukung atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak atau pengikatan agunan yang tidak sempurna; (ii) risiko reputasi untuk mengurangi kemungkinan kerugian akibat menurunnya tingkat kepercayaan pemangku kepentingan (*stakeholder*) yang bersumber dari persepsi negatif terhadap Bank; (iii) risiko stratejik untuk mengurangi kemungkinan kerugian akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan stratejik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis; dan (iv) risiko kepatuhan untuk mengurangi kemungkinan kerugian karena Bank tidak mematuhi atau tidak melaksanakan peraturan perundang-undangan dan ketentuan.

Upaya-upaya yang dilakukan untuk mengelola risiko hukum, risiko reputasi, risiko stratejik dan risiko kepatuhan seperti tersebut di atas diantaranya adalah:

- Mengelola Pedoman Perusahaan untuk manajemen risiko hukum, risiko reputasi, risiko stratejik, dan risiko kepatuhan;
- Melakukan analisis aspek risiko hukum dan uji kepatuhan terhadap produk atau aktivitas *existing* dan baru;
- Melakukan kaji ulang berkala terhadap format standar perjanjian, khususnya perjanjian kredit, guna memastikan kesesuaian dengan peraturan perundang-undangan;
- Melakukan kaji ulang secara berkala terhadap kontrak dan perjanjian antara BNI dengan pihak lain, antara lain dengan cara melakukan penilaian kembali terhadap efektivitas proses *enforcement* guna mengecek validitas hak dalam kontrak dan perjanjian yang ada;
- Melakukan pengelolaan komplain/keluhan nasabah dengan optimalisasi fungsi sarana *Online Request Management* (ORM), selanjutnya menyelesaikan permasalahan tersebut;

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

BNI also has risk management for other risks as regulated by Regulator, as follows (i) legal risk to minimise possible losses from lawsuits or weakness in juridical aspects such as the absence of laws and regulations, or weaknesses such as non-compliance with the terms of the engagements validity of contracts or imperfect binding of collaterals; (ii) reputation risk to minimise possible losses due to stakeholder's declining levels of trust which comes from the negative perception of the Bank; (iii) strategic risk to minimise possible losses arising from inappropriate or improper implementation of the Bank's strategy and business decisions, or strategy that is not responsive to external changes; and (iv) compliance risk to minimise possible losses of the Bank from non-compliance or failure to implement the prevailing laws and regulations.

The initiatives taken to manage legal risk, reputation risk, strategic risk and compliance risk as described above, among others, are as follows:

- *Manage Operational Guidance Manual for legal risk, reputation risk, strategic risk, and compliance risk;*
- *Analysis of the legal aspects and compliance test for existing and new product or activities;*
- *Conduct periodic reviews of the standard format of the agreement, especially the credit agreement, to ensure compliance with statutory regulations;*
- *Conduct periodic reviews of contracts and agreements between BNI and other parties, among others by reassessing the effectiveness of the enforcement process to check the validity of rights in existing contracts and agreements;*
- *Manage customer complaints by optimizing the function of Online Request Management (ORM) facilities, then resolve the issue;*

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

Upaya-upaya yang dilakukan untuk mengelola risiko hukum, risiko reputasi, risiko stratejik dan risiko kepatuhan seperti tersebut di atas diantaranya adalah: (lanjutan)

- Mengelola jumlah pemberitaan negatif yang ada di media, baik media cetak maupun media elektronik dan menindaklanjuti pemberitaan tersebut sesuai dengan ketentuan;
- Melakukan perencanaan strategis melalui serangkaian proses untuk penyelarasan strategi perusahaan dengan strategi unit;
- Melakukan pemantauan pencapaian rencana bisnis yang telah ditetapkan, dilakukan dengan membandingkan target terhadap realisasi bisnis;
- Melakukan sertifikasi kepatuhan terhadap kebijakan dan prosedur sesuai dengan ketentuan; dan
- Melakukan pemantauan terhadap jenis, signifikansi dan frekuensi pelanggaran terhadap ketentuan (*track record* kepatuhan BNI).

Sesuai dengan Surat Edaran OJK (SEOJK) No. 14/SEOJK.03/2015, BNI selaku Entitas Utama Konglomerasi Keuangan wajib menerapkan Manajemen Risiko Terintegrasi secara komprehensif dan efektif. Tujuan penerapan manajemen risiko terintegrasi tersebut yaitu untuk mengelola seluruh risiko yang melekat pada aktivitas/kegiatan usaha konglomerasi keuangan BNI serta menciptakan keunggulan kompetitif dan memelihara pertumbuhan yang berkesinambungan sehingga dapat meningkatkan nilai (*shareholder value*) konglomerasi keuangan BNI secara keseluruhan.

Secara umum, seluruh Lembaga Jasa Keuangan (LJK) anggota Konglomerasi Keuangan BNI, baik BNI sebagai LJK Induk (Entitas Utama) dan masing-masing LJK Anak telah menerapkan manajemen risiko, antara lain dengan membentuk unit risiko pada masing-masing LJK. Manajemen risiko pada masing-masing LJK Anak secara operasional dilakukan terpisah dari unit bisnis dan menjalankan fungsinya secara independen. Untuk mendukung penerapan manajemen risiko, pada organisasi LJK Anak juga dibentuk unit/fungsi internal yang melakukan pemantauan kepatuhan terhadap kontrol internal secara rutin dan berkala.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

The initiatives taken to manage legal risk, reputation risk, strategic risk and compliance risk as described above, among others, are as follows: (continued)

- *Managing the amounts of negative news on media, whether printed or electronic media, and follow up the proclamation in accordance with the prevailing policies;*
- *The strategic planning done through a series of strategic planning process to align the corporate strategy and strategy unit;*
- *Planning the completion of a business that has been determined, is done by comparing the target to the realisation of the business;*
- *Compliance certification to all policies and procedures in accordance with applicable regulations; and*
- *Monitoring of types, significance and frequency of violations of regulations (BNI compliance track record).*

In accordance with the Circular Letter of Financial Services Authority regulations (SEOJK) No. 14/SEOJK.03/2015, BNI as the parent entity of a financial conglomerate has to implement the integrated risk management comprehensively and effectively. The purpose of the implementation of integrated risk management implementation is to manage the whole inherent risks in the financial conglomerate's business activities, and also to create competitive advantages and maintain sustainable growth, so that it can increase the financial conglomeration shareholder value of BNI as a whole.

Generally, all of the Financial Services Institutions (FSI) as part of the BNI Financial Conglomeration, where BNI as the Parent FSI (Main Entity) and each Subsidiaries FSI have implemented risk management, among others by establishing a risk unit in each FSI. Risk management in each FSI is operating separately from the business unit and conducts its function independently. To support the implementation of risk management, the FSI have established internal control units/function in their organizational structure, which monitors the compliance with internal controls regularly and periodically on a regular basis.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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I. Manajemen risiko (lanjutan)

Disamping itu, Dewan Komisaris dan Direksi pada masing-masing LJK Anak secara aktif juga melakukan pemantauan, dan evaluasi melalui laporan-laporan yang disampaikan oleh setiap LJK Anak untuk selanjutnya digunakan sebagai salah satu bahan pertimbangan dalam menetapkan kebijakan pada LJK Anak.

BNI selaku Entitas Utama telah melakukan koordinasi dengan LJK Anak untuk menerapkan manajemen risiko sesuai ketentuan Otoritas Jasa Keuangan, antara lain dengan melakukan pemantauan dan pengukuran risiko yang dituangkan dalam bentuk penilaian Kecukupan Penyediaan Modal Minimum (KPMM) Konsolidasi, KPMM Terintegrasi, penilaian Tingkat Kesehatan Bank (TKB) konsolidasi, serta penilaian Profil Risiko Konsolidasi dan penilaian Profil Risiko Terintegrasi Konglomerasi Keuangan BNI (tidak diaudit).

Penilaian profil risiko BNI individu menggambarkan risiko yang melekat dalam kegiatan bisnis Bank (*inherent risk*) termasuk kualitas penerapan Manajemen Risiko yang mencerminkan sistem pengendalian risiko (*risk control system*) pada 8 (delapan) jenis risiko yaitu Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Reputasi, Risiko Stratejik, dan Risiko Kepatuhan. Penilaian Profil Risiko BNI telah dilakukan sesuai dengan lampiran SEOJK No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.

Berdasarkan hasil laporan terakhir atas penilaian sendiri (*self-assessment*), peringkat risiko inheren BNI posisi 31 Desember 2025 adalah *low to moderate* dengan peringkat kualitas penerapan manajemen risiko yang memadai (*satisfactory*) sehingga peringkat komposit Profil Risiko BNI adalah 2 (*low to moderate*) (tidak diaudit).

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

In addition, the Boards of Commissioners and Directors of the respective Subsidiaries actively monitor and evaluate the internal controls of the Subsidiaries, through the reports submitted by the respective Subsidiaries, as a basis in formulating and developing appropriate policies for the Subsidiaries.

As the Parent Entity, BNI coordinates with its FSI Subsidiaries regarding the implementation of risk management policies as defined by Indonesia Financial Services Authority, among others by implementing risk monitoring and measurement in the form of consolidated Capital Adequacy Ratio (CAR) assessment, integrated Capital Adequacy Ratio (CAR) assessment, the Bank's consolidated soundness rating consolidated assessment, consolidated risk profile and also integrated risk profile assessment on BNI Financial Conglomeration (unaudited).

The risk profile assessment of BNI reflects the inherent risk of the Bank's business, including the risk control system for 8 (eight) types of risk are assessed are Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputation Risk, Strategic Risk, and Compliance Risk. The risk profile of BNI has been performed based on attachment of SEOJK No. 14/SEOJK.03/2017 about the Bank's Soundness Rating Assessment.

Based on the results of a recent self-assessment report, inherent risk rank of BNI as of 31 December 2025 is low to moderate and the quality of the risk management implementation rank is satisfactory, therefore the risk profile composite rank of BNI is 2 (low to moderate) (unaudited).

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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I. Manajemen risiko (lanjutan)

Penilaian Profil Risiko Terintegrasi merupakan penilaian terhadap 10 (sepuluh) jenis Risiko berdasarkan Risiko Inheren dan Kualitas Penerapan Manajemen Risiko (KPMR) terintegrasi. Kesepuluh jenis Risiko tersebut adalah Risiko Kredit, Risiko Pasar, Risiko Likuiditas, Risiko Operasional, Risiko Hukum, Risiko Reputasi, Risiko Stratejik, Risiko Kepatuhan, Risiko Transaksi Intra-Grup dan Risiko Asuransi. Penilaian Profil Risiko BNI Terintegrasi tersebut telah dilakukan sesuai dengan lampiran SEOJK No. 14/SEOJK.03/2015 tanggal 25 Mei 2015 tentang Penerapan Manajemen Risiko Terintegrasi bagi Konglomerasi Keuangan.

Penilaian Profil Risiko Terintegrasi dilakukan semesteran. Berdasarkan hasil laporan terakhir secara penilaian sendiri (*self assessment*), peringkat risiko inheren posisi 31 Desember 2024 adalah *low to moderate* dengan peringkat kualitas penerapan manajemen risiko yang memadai (*satisfactory*) sehingga peringkat komposit Profil Risiko Konglomerasi Keuangan BNI adalah 2 *(low to moderate)* (tidak diaudit).

Tingkat Kesehatan Bank (TKB) BNI posisi 31 Desember 2025 yang dilakukan secara *self assessment* berada pada Peringkat 2 (PK 2) dengan predikat "sehat" atau stabil dibandingkan dengan TKB BNI posisi 31 Desember 2024 (tidak diaudit).

1. Profil Risiko
   Hasil penilaian Profil Risiko BNI posisi 31 Desember 2025 masih stabil di Peringkat 2 *(Low to Moderate)*.

2. Rentabilitas
   Terjadi penurunan tren risiko pada parameter Rentabilitas yang dipicu oleh pencapaian rasio profitabilitas yang telah membaik dan sesuai target.
3. Permodalan
   Penurunan tren risiko pada parameter permodalan diakibatkan peningkatan rasio CAR BNI karena peningkatan total modal BNI secara modal tier 1 melalui laba ditahan serta penerbitan *Additional Tier 1 Capital Securities* dan peningkatan modal tier 2 melalui penerbitan *subdebt*.

4. Tata Kelola
   Tata kelola BNI posisi 31 Desember 2025 dibandingkan dengan posisi 31 Desember 2024 relatif stabil.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

Integrated Risk Profile assessment is the assessment of the 10 (ten) types of risks based on Inherent Risks and the integrated Implementation of Risk Management Quality (KPMR). The ten types of Risks being assessed are Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Legal Risk, Reputation Risk, Strategic Risk, Compliance Risk, Intra Group Transactions Risk and Insurance Risk. Assessment of the Integrated Risk Profile has complied with the SEOJK No. 14/SEOJK.03/2015 dated 25 May 2015 about Integrated Risk Management Implementation for Financial Conglomerate.

Integrated Risk Profile assessment is conducted semi annually. Based on the results of the last self- assessment report, the inherent risk rank of BNI as of 31 December 2024 is low to moderate with the quality of the risk management implementation rank as satisfactory, therefore the composite rank of BNI's Risk Profile as a financial conglomeration is 2 (low to moderate) (unaudited).

BNI Bank Soundness Level (TKB) self assessment for the position as of 31 December 2025 which is in Rank 2 (PK 2) with the predicate "healthy" or stable compared to the TKB BNI at the position in 31 December 2024 (unaudited).

1. *Risk Profile*
   The results of the BNI Risk Profile assessment for the position 31 December 2025 are still stable at Rank 2 (Low to Moderate).
2. *Rentability*
   The decreasing of risk trend which occurred in Rentability parameter which was triggered by improvement of the achievement of a profitability ratio as target.
3. *Capital*
   The decreasing risk trend in the capital parameter was due to an increase in the BNI's total capital component due to an increase of BNI's tier 1 capital from retained earnings as well as issuance of Additional Tier 1 Capital Securities and increase of tier 2 capital due to subdebt issuance.
4. *Governance*
   BNI's governance for the position of 31 December 2025 is relatively stable compared to the position in 31 December 2024.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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I. Manajemen risiko (lanjutan)

Guna melakukan penguatan fungsi manajemen risiko, BNI juga melakukan beberapa upaya antara lain:

1. Simulasi Kondisi Terburuk dan *Stress Testing*.

   Stress testing merupakan salah satu alat manajemen risiko yang digunakan BNI untuk mengevaluasi dampak suatu skenario yang *severe* namun mungkin terjadi (*plausible*) terhadap kondisi finansial Bank. BNI melakukan *stress testing* secara berkala sebagai salah satu dasar pertimbangan untuk keputusan dan arahan direksi dan dewan komisaris atau dalam pengambilan keputusan Bank serta sebagai pemenuhan atas ketentuan regulasi yang berlaku baik di Indonesia maupun ketentuan regulator pada masing-masing Kantor Luar Negeri (KLN). Selain sebagai dasar pengambilan keputusan dan pemenuhan regulasi, *stress testing* juga bertujuan untuk mengestimasi besarnya kerugian yang akan timbul serta ketahanan modal Bank dalam menyerap kerugian tersebut dan mengidentifikasi langkah-langkah yang harus dilakukan untuk memitigasi risiko dan menjaga ketahanan modal Bank. Dalam hal likuiditas, *stress test* berfungsi untuk mengestimasi kecukupan alat likuid Bank untuk memenuhi kewajiban, baik kontraktual maupun *behavioral*.

   Hasil *stress testing* yang dilakukan BNI sepanjang tahun 2025 menunjukkan bahwa permodalan BNI masih mampu untuk menyerap kerugian yang akan timbul serta mampu menjaga kecukupan likuiditas dengan antisipasi yang cepat pada sisi pengelolaan aset dan liabilitas serta kesiapan kebijakan pendukung rencana pendanaan. Selain itu, BNI juga telah menetapkan mitigasi risiko atas kemungkinan kerugian yang akan timbul.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

In order to strengthen the risk management function, BNI has also carried out several efforts, including:

1. Worst Condition Simulation and Stress Testing.

   Stress testing is one of the risk management tools used by BNI to evaluate the impact of a severe but plausible scenario on the Bank's financial condition. BNI carries out stress testing periodically as a basis for consideration for decisions and directions of the board of directors and board of commissioners or in making Bank decisions as well as in compliance with applicable regulatory provisions both in Indonesia and regulatory provisions at each Overseas Branches (KLN). Apart from being a basis for decision making and compliance with regulations, stress testing also aims to estimate the magnitude of losses that will arise as well as the resilience of the Bank's capital in absorbing these losses and identifying steps that must be taken to mitigate risks and maintain the resilience of the Bank's capital. In terms of liquidity, the stress test functions to estimate the adequacy of the Bank's liquid assets to fulfill obligations, both contractual and behavioral.

   The results of stress testing carried out by BNI throughout 2025 show that BNI's capital is still able to absorb losses that will arise and is able to maintain sufficient liquidity with rapid anticipation in terms of asset and liability management as well as the readiness of policies to support funding plans. Apart from that, BNI has also established risk mitigation for possible losses that may arise.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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I. Manajemen risiko (lanjutan)

2. Penyusunan Rencana Aksi *(Recovery Plan)* dan Rencana Resolusi *(Resolution Plan)*.

Recovery Plan merupakan rencana untuk mengatasi (mencegah, memulihkan dan memperbaiki) permasalahan keuangan yang mungkin terjadi di Bank Sistemik. Penyusunan *Recovery Plan* merupakan pemenuhan atas Peraturan OJK No. 14/POJK.03/2017 tanggal 4 April 2017 tentang Rencana Aksi (*Recovery Plan*) bagi Bank Sistemik, yang dimaksudkan untuk mengatasi secara dini permasalahan keuangan yang mungkin terjadi pada Bank sistemik melalui mekanisme *"bail in"* sehingga permasalahan keuangan tersebut diharapkan tidak sampai memicu dampak sistemik bagi sistem keuangan nasional. BNI sebagai Bank Sistemik wajib menyusun *Recovery Plan* kepada OJK setiap tahun secara berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun dan menyampaikan pengkinian Rencana Aksi kepada OJK paling lama akhir bulan November.

Resolution Plan merupakan rencana penanganan atau penyelesaian oleh Lembaga Penjamin Simpanan (LPS) ketika Bank dinyatakan sebagai bank gagal, tertuang dalam dokumen *Resolution Plan* yang di-reviu secara periodik setiap 2 (dua) tahun sekali. Penyusunan *Resolution Plan* merupakan pemenuhan atas Peraturan Lembaga Penjamin Simpanan No. 1 Tahun 2021 tentang Rencana Resolusi bagi Bank Umum. Rencana Resolusi merupakan komitmen Bank, pemegang saham pengendali dan/atau pihak lain untuk mewujudkan resolusi Bank yang efektif guna mengurangi gangguan sistemik ke stabilitas sistem keuangan serta meminimalisir penggunaan dana publik (APBN) dalam resolusi Bank. Rencana Resolusi berisi informasi mengenai Bank yang sejalan dengan Rencana Aksi yang dilengkapi dengan analisa opsi resolusi dan potensi hambatan pelaksanaan opsi resolusi, serta strategi komunikasi sebelum dilakukannya penanganan permasalahan solvabilitas Bank oleh otoritas resolusi.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

2. Preparation of Recovery Plan and Resolution Plan.

The Recovery Plan is a plan to overcome (prevent, recover and repair) financial problems that may occur at Systemic Banks. The preparation of the Recovery Plan is a fulfillment of OJK Regulation No. 14/POJK.03/2017 dated 4 April 2017 concerning Action Plans (Recovery Plan) for Systemic Banks, which is intended to overcome early financial problems that may occur in systemic Banks through a "bail in" mechanism so that it is hoped that these financial problems will not trigger a systemic impact on the national financial system. BNI as a Systemic Bank is obliged to prepare a Recovery Plan to the OJK every year on a regular basis at least 1 (one) time in 1 (one) year and submit an updated Action Plan to the OJK no later than the end of November.

The Resolution Plan is a handling or resolution plan by the Deposit Insurance Corporation (LPS) when the Bank is declared as a failed bank, contained in the Resolution Plan document which is reviewed periodically every 2 (two) years. The preparation of the Resolution Plan is a fulfillment of the Deposit Insurance Corporation Regulation No. 1 of 2021 concerning Resolution Plans for Commercial Banks. The Resolution Plan is a commitment of the Bank, controlling shareholders and/or other parties to realise an effective Bank resolution to reduce systemic disruption to financial system stability and minimise the use of public funds (APBN) in Bank resolutions. The Resolution Plan contains information about the Bank that is in line with the Action Plan which is equipped with analysis of resolution options and potential obstacles to implementing resolution options, as well as communication strategies before handling Bank solvency problems by the resolution authority.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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I. Manajemen risiko (lanjutan)

3. Penilaian *Risk Maturity Index* (RMI).

Risk Maturity Index (RMI) merupakan indeks yang digunakan untuk mengukur efektivitas dan kualitas penerapan manajemen risiko dalam melindungi dan menciptakan nilai. Berdasarkan Surat Kementerian BUMN No. S-31/Wk2.MBU.A/ 09/2020 dimana disampaikan dalam rangka mengimplementasikan rencana strategis Kementerian BUMN tahun 2020–2024, sesuai Peraturan Menteri BUMN No. PER-08/MBU/08/2020 perlu dilakukan penguatan terhadap fungsi Manajemen Risiko salah satunya menetapkan nilai RMI sebagai salah satu indikator kinerja utama peningkatan pengelolaan Risiko BUMN. Hasil *assessment* RMI BNI telah mencapai skor *"Managed"* (tidak diaudit).

Dalam rangka pemenuhan kepatuhan terhadap Peraturan Menteri BUMN No. PER-02/ MBU/03/2023, maka akan dilakukan penilaian RMI secara berkelanjutan dengan memperhatikan keputusan deputi bidang keuangan dan manajemen risiko KBUMN No. SK-8/DKU.MBU/12/2023 tanggal 6 Desember 2023 tentang Petunjuk teknis RMI. Penilaian RMI akan dilakukan berbasis kinerja, yaitu menggabungkan penilaian RMI berdasarkan 5 dimensi yaitu (1) budaya & kapabilitas risiko, (2) organisasi & tata kelola risiko, (3) kerangka risiko & kepatuhan, (4) proses & kontrol risiko, dan (5) model, data, dan teknologi risiko, dengan realisasi kinerja yang terdiri dari Tingkat Kesehatan Peringkat Akhir (*final rating*) dan Peringkat Komposit Risiko.

Pengungkapan lebih lanjut pada manajemen risiko diungkapkan pada Catatan 48.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

3. Risk Maturity Index (RMI) Assessment.

Risk Maturity Index (RMI) is an index used to measure the effectiveness and quality of implementing risk management in protecting and creating value. Based on the Letter of the Ministry of BUMN No. S-31/Wk2.MBU.A/09/2020 which was submitted in order to implement the strategic plan of the Ministry of BUMN for 2020–2024, in accordance with Minister of BUMN Regulation No. PER-08/MBU/08/2020 requires strengthening the Risk Management function, one of which is determining the RMI value as one of the main performance indicators for improving BUMN Risk management. BNI's RMI assessment results have achieved a "Managed" score (unaudited).

In order to fulfill compliance with BUMN Ministerial Regulation No. PER-02/ MBU/03/2023, an ongoing RMI assessment will be carried out taking into account the decision of the deputy for finance and risk management of KBUMN No. SK-8/DKU.MBU/12/2023 dated 6 December 2023 concerning RMI technical instructions. The RMI assessment will be carried out based on performance, namely combining RMI assessments based on 5 dimensions, namely (1) risk culture & capability, (2) risk organization & governance, (3) risk & compliance framework, (4) risk processes & controls, and (5) risk models, data and technology, with performance realisation consisting of Final Rating Health Level and Risk Composite Rating.

The further disclosures on risk management are presented in Note 48.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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I. Manajemen risiko (lanjutan)

Sebagai bagian dari Strategi Manajemen Risiko, BNI menetapkan *Risk Appetite Statement* (RAS). RAS merupakan jenis dan tingkat risiko yang sanggup diambil/dihadapi Bank yang berada dalam kapasitas risiko yang dimiliki dalam rangka mencapai tujuan bisnis. Adapun *Risk Appetite Statement* BNI sebagai berikut:

Risk Appetite	*Risk Appetite Statement*
Permodalan	Memelihara modal sesuai dengan tingkat risiko dan di-reviu secara periodik.
Rentabilitas	Memelihara rentabilitas secara berkesinambungan dalam jangka panjang untuk mendukung pertumbuhan permodalan dan kinerja bank.
Risiko Kredit	a. Memelihara pertumbuhan kredit yang berkualitas fokus pada sektor prioritas. Pemberian kredit kepada sektor industri dan kegiatan usaha berisiko tinggi dilakukan dengan sangat hati-hati dan selektif. b. Mengelola risiko konsentrasi pada level yang menghasilkan *return* optimum. c. Meningkatkan kualitas kredit dan efektivitas pengelolaan kredit bermasalah.
Risiko Pasar	Memelihara tingkat Risiko Pasar sesuai ketentuan dengan tetap memperhatikan pencapaian target bisnis.
Risiko Likuiditas	Memelihara ketersediaan likuiditas sesuai ketentuan dengan tetap memperhatikan pencapaian target bisnis.
Risiko Operasional	a. Intoleransi pada *internal fraud*. b. Integritas sepenuhnya terintegrasi ke dalam semua proses pengambilan keputusan dan perencanaan. c. Bank memiliki *risk appetite* yang rendah atas risiko operasional sehingga perlu perbaikan terus menerus terhadap Kualitas Identifikasi dan Pengendalian Risiko. d. Manajemen risiko yang kuat untuk keberlangsungan layanan IT. e. Menjaga implementasi proyek IT sesuai jadwal yang telah ditetapkan. f. *Business Continuity Management* (BCM) yang kuat untuk meminimalkan dampak *external event* terhadap SDM, layanan dan aset BNI.
Risiko Hukum	Meminimalisir potensi kerugian akibat permasalahan hukum dalam kegiatan usaha BNI.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

As part of the Risk Management Strategy, BNI establishes a Risk Appetite Statement (RAS). RAS is the type and level of risk that a Bank can take/face within its risk capacity in order to achieve business objectives. The BNI Risk Appetite Statement is as follows:

Risk Appetite	*Risk Appetite Statement*
Capital	*Maintaining capital according to the level of risk and reviewed periodically.*
Rentability	*Maintain sustainable profitability in the long term to support capital growth and bank performance.*
Credit Risk	*a. Maintaining quality credit growth focusing on priority sectors. Lending to the industrial sector and high-risk business activities is carried out very carefully and selectively.* *b. Manage concentration risk at a level that generates optimum returns.* *c. Improving credit quality and effectiveness in managing non-performing loans.*
Market Risk	*Maintaining the level of Market Risk in accordance with regulations while taking into account the achievement of business targets.*
Liquidity Risk	*Maintaining the availability of liquidity in accordance with the provisions by taking into account the achievement of business targets.*
Operational Risk	*a. Intolerance to internal fraud.* *b. Integrity is fully integrated into all decision-making and planning processes.* *c. Bank has a low risk appetite for operational risks so it needs continuous improvement in the Quality of Risk Identification and Control.* *d. Strong risk management for continuity of IT services.* *e. Maintain the implementation of IT projects according to a predetermined schedule.* *f. Strong Business Continuity Management (BCM) to minimise the impact of external events on HR, BNI services and assets.*
Legal Risk	*Minimizing potential losses due to legal issues in BNI's business activities.*

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

I. Manajemen risiko (lanjutan)

Sebagai bagian dari Strategi Manajemen Risiko, BNI menetapkan *Risk Appetite Statement* (RAS). RAS merupakan jenis dan tingkat risiko yang sanggup diambil/dihadapi Bank yang berada dalam kapasitas risiko yang dimiliki dalam rangka mencapai tujuan bisnis. Adapun *Risk Appetite Statement* BNI sebagai berikut:

Risk Appetite	*Risk Appetite Statement*
Risiko Stratejik	a. Menghasilkan pendapatan yang berkelanjutan dengan risiko yang terjaga. b. Memelihara kecukupan permodalan berada di atas ketentuan minimum regulator dan memenuhi kebutuhan saat normal maupun krisis. c. Menjaga kinerja bisnis yang berkelanjutan dengan risiko yang terjaga. d. Menjaga Tingkat Kesehatan Bank minimal pada predikat Sehat.
Risiko Kepatuhan	Meminimalisir secara berkelanjutan denda dari Regulator sehingga menurun dari waktu ke waktu.
Risiko Reputasi	a. Menjaga *rating* BNI tetap *investment grade*. b. Meningkatkan kepercayaan dan persepsi positif melalui *Customer Journey* untuk mendukung pertumbuhan bisnis.

Agar penerapan manajemen risiko dapat berjalan secara efektif, BNI menyusun *Risk Governance* sebagai bagian dari sistem Tata Kelola Perusahaan (*Corporate Governance*) yang fokus pada struktur, proses dan pendekatan pengelolaan risiko dalam upaya pencapaian tujuan bisnis.

Inisiatif dan langkah-langkah penyempurnaan telah dilakukan untuk meletakkan landasan yang kuat dalam manajemen risiko di BNI yang mencakup aspek-aspek organisasi, strategi, sistem informasi dan operasi, serta pengembangan sumber daya manusia. BNI juga telah melakukan langkah-langkah antisipatif yang menyentuh aspek humanis dan personal setiap individu BNI, yaitu dengan membangun budaya risiko yang kuat yang merupakan bagian dari budaya perusahaan BNI. BNI terus berupaya untuk meningkatkan budaya risiko segenap insan BNI agar tercipta budaya risiko yang kuat.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

I. Risk management *(continued)*

As part of the Risk Management Strategy, BNI establishes a Risk Appetite Statement (RAS). RAS is the type and level of risk that a Bank can take/face within its risk capacity in order to achieve business objectives. The BNI Risk Appetite Statement is as follows:

Risk Appetite	*Risk Appetite Statement*
Strategic Risk	*a. Generate sustainable income with manageable risk.* *b. Maintaining capital adequacy that is above the minimum regulatory requirements and meets needs during normal and crisis times.* *c. Maintain sustainable business performance with controlled risks.* *d. Maintaining the Bank's Health Level at a minimum of the Healthy predicate.*
Compliance Risk	*Minimising on an ongoing basis fines from Regulators so that they decrease over time.*
Reputation Risk	*a. Maintaining BNI's investment grade rating.* *b. Increase trust and positive perceptions through Customer Journey to support business growth.*

Risk Governance is formed to enforce the effectiveness of risk management implementation, and as a part of Corporate Governance system, which focuses on structure, process and approach to risk management in achieving the business goals.

Initiatives and corrective actions have been taken to build a solid foundation for BNI's risk management, covering aspect of organization, strategies, information system and operations, and human capital. BNI has taken some anticipatory actions related to humanity and personal aspects of each individual of BNI by implementing risk culture enhancement to build a strong risk culture that is part of the BNI's company culture. BNI constantly strives to improve employee's risk culture in order to create a strong risk culture.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

m. Risiko pasar

Risiko mata uang

Berikut adalah Posisi Devisa Neto (PDN), dalam nilai absolut, BNI pada tanggal 31 Desember 2025 per mata uang, sesuai dengan peraturan Bank Indonesia:

m. Market risk

Currency risk

Presented below is the Net Open Position (NOP), in absolute amounts, of BNI as of 31 December 2025 by currency, based on Bank Indonesia regulations:

	2025			
Mata Uang	**Aset/ *Assets***	**Liabilitas/ *Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	***Currencies***
KESELURUHAN (LAPORAN POSISI KEUANGAN DAN REKENING ADMINISTRATIF)				***AGGREGATE (STATEMENT OF FINANCIAL POSITION AND ADMINISTRATIVE ACCOUNTS)***
Dolar Amerika Serikat	550,378,169	551,245,188	867,019	*United States Dollar*
Euro Eropa	24,092,642	23,814,687	277,955	*European Euro*
Yen Jepang	30,240,807	30,279,413	38,606	*Japanese Yen*
Yuan China	3,609,098	3,392,628	216,470	*Chinese Yuan*
Dolar Singapura	7,552,776	7,573,627	20,851	*Singapore Dollar*
Dolar Hong Kong	1,101,682	1,017,998	83,684	*Hong Kong Dollar*
Pound sterling Inggris	2,495,043	2,523,682	28,639	*British Pound Sterling*
Lain-lain	5,158,455	5,011,244	334,134*)	*Others*
			1,867,358	
LAPORAN POSISI KEUANGAN				***STATEMENT OF FINANCIAL POSITION***
Dolar Amerika Serikat	307,880,052	309,790,596	1,910,544	*United States Dollar*
Euro Eropa	5,399,896	3,720,040	1,679,856	*European Euro*
Yen Jepang	15,441,600	15,771,390	329,790	*Japanese Yen*
Yuan China	2,113,539	2,127,705	14,166	*Chinese Yuan*
Dolar Singapura	5,724,694	5,661,930	62,764	*Singapore Dollar*
Dolar Hong kong	477,088	246,713	230,375	*Hong Kong Dollar*
Pound sterling Inggris	466,024	177,907	288,117	*British Pound Sterling*
Lain-lain	3,299,539	1,954,981	1,344,558*)	*Others*
			5,860,170	
Total Modal Tier I dan Tier II dikurangi penyertaan pada Entitas Anak (Catatan 54)			165,630,093	*Total Tier I and II Capital less investment in Subsidiaries (Note 54)*
Rasio PDN (Keseluruhan)			1.13%	*NOP Ratio (Aggregate)*
Rasio PDN (Laporan Posisi Keuangan)			3.54%	*NOP Ratio (Statement of Financial Position)*

*) Merupakan penjumlahan absolut dari selisih antara aset dan liabilitas dari beberapa mata uang asing lainnya

*) *Sum of the absolute values of the difference between assets and liabilities of other foreign currencies*

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

m. Risiko mata uang (lanjutan)

Berikut adalah Posisi Devisa Neto (PDN), dalam nilai absolut, BNI pada tanggal 31 Desember 2024 per mata uang, sesuai dengan peraturan Bank Indonesia:

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

m. Currency risk *(continued)*

Presented below is the Net Open Position, in absolute amounts, of BNI as of 31 December 2024 by currency, based on Bank Indonesia regulations:

	2024			
Mata Uang	**Aset/ *Assets***	**Liabilitas/ *Liabilities***	**Posisi Devisa Neto/ *Net Open Position***	***Currencies***
KESELURUHAN (LAPORAN POSISI KEUANGAN DAN REKENING ADMINISTRATIF)				***AGGREGATE (STATEMENT OF FINANCIAL POSITION AND ADMINISTRATIVE ACCOUNTS)***
Dolar Amerika Serikat	504,259,275	504,848,665	589,390	*United States Dollar*
Yen Jepang	24,568,493	24,514,414	54,079	*Japanese Yen*
Euro Eropa	19,194,866	19,296,896	102,030	*European Euro*
Dolar Singapura	7,016,224	7,139,863	123,639	*Singapore Dollar*
Yuan China	5,773,744	5,585,695	188,049	*Chinese Yuan*
Pound sterling Inggris	1,252,126	1,286,866	34,740	*British Pound Sterling*
Dolar Hong Kong	908,009	891,483	16,526	*Hong Kong Dollar*
Lain-lain	5,049,417	4,913,311	210,189 *)	*Others*
			1,318,642	
LAPORAN POSISI KEUANGAN				***STATEMENT OF FINANCIAL POSITION***
Dolar Amerika Serikat	290,730,836	295,940,547	5,209,711	*United States Dollar*
Yen Jepang	16,231,952	16,223,421	8,531	*Japanese Yen*
Dolar Singapura	4,393,175	4,523,324	130,149	*Singapore Dollar*
Yuan China	3,095,469	2,965,492	129,977	*Chinese Yuan*
Euro Eropa	3,925,460	2,227,695	1,697,765	*European Euro*
Dolar Hong kong	364,731	233,401	131,330	*Hong Kong Dollar*
Pound sterling Inggris	419,095	130,399	288,696	*British Pound Sterling*
Lain-lain	3,291,288	2,113,416	1,177,872 *)	*Others*
			8,774,031	
Total Modal Tier I dan Tier II dikurangi penyertaan pada Entitas Anak (Catatan 54)			152,307,417	*Total Tier I and II Capital less investment in Subsidiaries (Note 54)*
Rasio PDN (Keseluruhan)			0.87%	*NOP Ratio (Aggregate)*
Rasio PDN (Laporan Posisi Keuangan)			5.76%	*NOP Ratio (Statement of Financial Position)*

*) Merupakan penjumlahan absolut dari selisih antara aset dan liabilitas beberapa mata uang asing lainnya

*) *Sum of the absolute values of the difference between assets and liabilities of other foreign currencies*

Pengungkapan lebih lanjut pada risiko pasar diungkapkan pada Catatan 51.

The further disclosures on market risk are presented in Note 51.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

n. Risiko operasional

Risiko Operasional terjadi karena adanya ketidakcukupan atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, atau adanya gangguan eksternal yang memengaruhi operasional Bank. Kejadian Risiko Operasional merupakan kejadian risiko yang melekat pada setiap proses bisnis dan operasional yang dijalankan Bank dan dapat memicu terjadinya risiko reputasi, risiko hukum, risiko kepatuhan, serta risiko lainnya apabila tidak dikelola dengan baik.

Dalam rangka menerapkan manajemen risiko operasional, BNI mengacu pada ketentuan Otoritas Jasa Keuangan, Bank Indonesia, serta *International Best Practices*. BNI juga memiliki prosedur manajemen risiko operasional yang disusun dan dievaluasi secara berkala sebagai pedoman bagi segenap unit kerja dalam melaksanakan kerangka kerja manajemen risiko operasional yang telah ditetapkan oleh Bank. Strategi Manajemen Risiko Operasional dirumuskan sesuai strategi dan tujuan bisnis secara keseluruhan dengan memerhatikan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*).

Tata kelola manajemen risiko operasional diimplementasikan berdasarkan konsep *Three Lines Model* yang membedakan antara Satuan Kerja Operasional (*Risk Taking Unit*) yang merupakan *Risk and Control Owner*, Satuan Kerja Manajemen Risiko yang independen dan Satuan Kerja Audit Intern. Satuan Kerja Operasional dalam konteks risiko operasional bermitra dengan *Senior Operational Risk Executive* (SORX) dalam memitigasi risiko yang dihadapi pada area cakupan atau sektor masing-masing. Satuan Kerja Manajemen Risiko bertugas memantau risiko dan menyediakan kebijakan/prosedur terkait manajemen risiko serta mereviu produk Bank baru. Satuan Kerja Audit Intern bertugas memastikan efektivitas pengelolaan risiko dan pengendalian intern.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

n. Operational risk

Operational risk arises from inadequate or failed internal processes, human errors. system failures, or external events that disrupt the Bank's operations. Operational risks are inherent in all business and operational activities, and if not effectively managed, they may lead to reputational, legal, compliance, or other related risks.

In implementing operational risk management, BNI refers to the regulations of the Financial Authority Regulations, Bank Indonesia, and International Best Practices. BNI has also established operational risk management procedures, which are reviewed and updated regularly, to serve as guidelines for all work units in applying the Bank's operational risk management framework. The Operational Risk Management Strategy is formulated in alignment with the Bank's overall business strategies and objectives, taking into account the defined risk appetite and risk tolerance.

Operational risk management governance is implemented based on the Three Lines Model concept which differentiates between Risk Taking Units (RTU) that have the role as Risk and Control Owner, Risk Management Units that are independent to RTU, and Internal Audit. The Risk Taking Unit functions are carried out by the Operation Units and together with the Senior Operational Risk Executive (SORX) mitigating the potential operational risks. Risk Management Units are monitoring risks and providing policies/procedures related to risk management to minimize risks and reviewing new Bank products. Internal Audit is ensuring the effectiveness of risk management and internal control.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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n. Risiko operasional (lanjutan)

Proses manajemen risiko operasional dilakukan oleh segenap unit baik Lini Pertama (*maker-checker*, *segregation of duties*, rekonsiliasi, dll), Lini Kedua (*framework*, kebijakan, prosedur, dll), dan Lini Ketiga (audit secara berkala). Salah satu proses manajemen risiko operasional yang dilakukan di BNI adalah proses *Risk Control Self-Assessment* (RCSA) yang merupakan sebuah proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko operasional yang dilakukan periodik secara *self-assessment* oleh segenap unit kerja, yang bertujuan untuk mengidentifikasi potensi kelemahan kontrol yang ada sehingga risiko dapat dimitigasi sedini mungkin. Pada proses identifikasi risiko, telah ditetapkan taksonomi risiko operasional sebagai acuan dalam pemetaan semua risiko yang ada, sehingga identifikasi menjadi lebih granular dan tindak lanjut serta prioritas yang diambil dapat menjadi lebih fokus.

Proses RCSA merupakan dasar untuk mengidentifikasikan *Control Improvement Plan* (CIP) atau perbaikan kontrol yang dibutuhkan. Selain bersumber dari aktivitas RCSA, CIP juga dapat dihasilkan dari tindak lanjut kejadian risiko operasional serta proses identifikasi lainnya. Hal ini bertujuan agar perbaikan dan peningkatan kontrol dilakukan secara berkelanjutan serta merupakan cerminan dari budaya risiko yang kuat

Terkait dengan kejadian risiko operasional, BNI menetapkan mekanisme identifikasi kejadian risiko operasional, mencatat, melaporkan dan menganalisis kejadian yang ada melalui prosedur *Operational Risk Event* (ORE) *Management*. ORE sebagai suatu sarana untuk menganalisa akar permasalahan dan menyusun tindak lanjut yang diperlukan melalui tindakan preventif kedepannya dan tindakan remediasi yang diperlukan. Selain itu, BNI memiliki mekanisme pelaporan Risiko Operasional sebagai pertimbangan dalam pengambilan keputusan strategis dan eskalasi kepada Manajemen dengan tujuan kecepatan informasi atas kejadian risiko operasional disertai dengan tindak lanjut.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

n. Operational risk *(continued)*

The operational risk management process is implemented across all units, including the First Line (e.g., maker-checker, segregation of duties, reconciliation, etc), the Second Line (e.g., frameworks, policies, procedures, etc), and the Third Line (e.g., periodic audits). One of the operational risk management activities at BNI is the Risk Control Self-Assessment (RCSA), a process involving the periodic identification, measurement, monitoring, and control of operational risks through self-assessment conducted by all RTU, with the objective of identifying potential weaknesses in existing controls so that risks can be mitigated as early as possible. As part of the risk identification process, BNI has established an operational risk taxonomy to serve as a reference for mapping all identified risks. This taxonomy enables more granular identification of risks, thereby allowing for more focused prioritization and follow-up actions.

The RCSA process as foundation for identifying the Control Improvement Plan (CIP), or enhancements to existing controls. CIP may also be derived from follow-up actions related to operational risk events and other risk identification processes. This approach ensures that control improvements are implemented continuously and reflect a strong risk culture.

In managing operational risk events, BNI has established a structured mechanism for identifying, recording, reporting, and analyzing incidents through the Operational Risk Event (ORE) Management procedure. The ORE process serves as a tool to analyze root causes and formulate necessary follow-up actions, including preventive measures and remediation efforts. In addition, BNI has implemented an operational risk reporting mechanism to support strategic decision-making and escalation to Management, aiming to ensure timely information and appropriate response to operational risk events.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

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n. Risiko operasional (lanjutan)

Dalam perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk Risiko Operasional BNI menggunakan Pendekatan Standar sesuai dengan regulasi dari Otoritas Jasa Keuangan (OJK) yang dipergunakan sebagai salah satu elemen dalam mengukur kecukupan modal (*Capital Adequacy Ratio*).

Proses manajemen risiko operasional memerlukan dukungan organisasi dengan gambaran jelas terkait tugas dan tanggung jawab yang dipahami secara utuh oleh semua unit kerja. Mekanisme *maker* dan *checker* yang dijalankan secara konsisten terjadi dalam organisasi sehingga proses manajemen risiko operasional dapat berjalan sesuai dengan yang direncanakan.

Penggunaan dan penerapan teknologi informasi dapat mendukung proses manajemen risiko operasional sesuai kompleksitas Bank dan otomasi proses kontrol dapat memaksimalkan upaya mitigasi risiko. Data yang terintegrasi untuk risiko operasional dapat menghasilkan informasi yang lengkap dan akurat yang dapat digunakan dalam pengelolaan risiko operasional dan sebagai data pendukung dalam pengambilan keputusan oleh manajemen. Untuk memenuhi kebutuhan tersebut, BNI telah mengembangkan *Operational Risk Management System* (ORMS).

Pondasi yang terpenting dan fundamental dalam manajemen risiko operasional di BNI adalah budaya risiko yang kuat, perilaku pegawai yang sesuai atas *risk* & *control*, dan mindset yang tepat atas manajemen risiko. Dengan terpenuhinya aspek ini, maka proses manajemen risiko dapat berjalan dengan efektif dimana garda terdepan yang berhadapan dengan risiko dapat secara optimal memitigasi risiko dan hal ini juga akan dilengkapi oleh metodologi lainnya, sehingga upaya manajemen risiko dapat bermanfaat secara maksimal. Upaya - upaya untuk meningkatkan budaya risiko operasional dilakukan antara lain melalui berbagai program *risk awareness* yang disampaikan secara konsisten, berkelanjutan, dan fokus melalui berbagai macam media seperti buletin, poster, PC *wallpaper*, *video*, dan lain sebagainya.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

n. Operational risk *(continued)*

For the calculation of Risk-Weighted Assets (RWA) related to operational risk, BNI adopts the Standardized Approach in accordance with regulations issued by the Financial Services Authority (Otoritas Jasa Keuangan/ OJK) which is used as one of the elements in measuring capital adequacy (Capital Adequacy Ratio.

The operational risk management process necessitates strong organizational support, with clearly defined roles and responsibilities that are well understood by all work units. The maker and checker mechanisms are consistently implemented within the organization to ensure that the operational risk management process functions as intended.

The utilization of information technology can support the operational risk management process, which align with the Bank's complexity and automation of control processes, can enhance risk mitigation efforts. Integrated data related to operational risk enables the generation of complete and accurate information, which is essential for effective risk management and serves as a valuable resource for management decision-making. To address these needs, BNI has developed the Operational Risk Management System (ORMS).

The most important and fundamental foundation of operational risk management in BNI is a strong risk culture, appropriate employee behavior regarding risk and control, and the right mindset toward risk management. By fulfilling these aspects, the risk management process can be implemented effectively, enabling the front line to optimally mitigate risks. These efforts are further supported by complementary methodologies to ensure that risk management delivers maximum value. Initiatives to enhance the operational risk culture are carried out through various risk awareness programs that are delivered consistently, continuously, and in a focused manner through multiple media channels, such as bulletins, posters, PC wallpapers, videos, and more.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

n. Risiko operasional (lanjutan)

Terkait dengan kelangsungan usaha bila terjadi kondisi *disaster* (bencana), BNI sudah mempunyai prosedur *Business Continuity Management* (BCM), yaitu suatu mekanisme formal yang merupakan kombinasi antara strategi, prosedur, dan organisasi yang dikembangkan untuk memastikan kelangsungan operasional dari fungsi-fungsi usaha yang kritikal pada tingkat layanan tertentu pada saat terjadi gangguan atau bencana. Prosedur ini mencakup semua unit usaha yang ada di BNI, baik di dalam negeri maupun di luar negeri. Untuk meningkatkan kesiapan terhadap penanganan insiden, BNI melakukan pengkinian dokumen dan pengujian BCM secara teratur.

BNI memiliki infrastruktur yang dibutuhkan dalam implementasi BCM seperti *Data Center* (DC), *Disaster Recovery Center* (DRC), dan Lokasi Alternatif Gedung BCM.

o. Manajemen modal

Pada tanggal 31 Desember 2025 dan 2024, Bank telah memenuhi semua persyaratan modal yang diwajibkan.

Rasio Liabilitas Penyediaan Modal Minimum

Rasio Liabilitas Penyediaan Modal Minimum (*Capital Adequacy Ratio* (CAR)) adalah rasio modal terhadap aset tertimbang menurut risiko (*Risk - Weighted Assets* (RWA)). Berdasarkan peraturan Bank Indonesia, jumlah modal untuk risiko kredit terdiri dari Modal Inti ("Tier I") dan Modal Pelengkap ("Tier II") dikurangi penyertaan pada Entitas Anak. Sesuai dengan Peraturan OJK No. 11/POJK.03/2016, Peraturan OJK No. 34/POJK.03/2016, dan Peraturan OJK No. 27 Tahun 2022 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dan Surat Edaran OJK No.9/SEOJK.03/2020 tentang Transparansi dan Publikasi Laporan Bank Umum Konvensional, sejak akhir bulan September 2016, Cadangan Tujuan tidak dapat lagi diperhitungkan sebagai komponen Modal Bank.

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

n. Operational risk *(continued)*

To ensure business continuity in the event of a disaster, BNI has established a Business Continuity Management (BCM) framework - a formal mechanism comprising strategies, procedures, and organizational structures designed to maintain the continuity of critical business functions at a predefined service level during disruptions or disasters. This procedure covers all of BNI's business units, both domestic and international. To enhance incident response readiness, BNI regularly updates and tests its BCM documentation.

BNI has the infrastructure needed to implement BCM such as Data Center (DC), Disaster Recovery Center (DRC), and BCM Alternative Site.

o. Capital management

As of 31 December 2025 and 2024, the Bank has complied with all capital requirements.

Capital Adequacy Ratio

The Capital Adequacy Ratio (CAR) is the ratio of the Bank's capital over its Risk - Weighted Assets (RWA). Based on Bank Indonesia regulations, the total capital for credit risk consists of core capital (Tier I) and supplementary capital (Tier II) less investments in Subsidiaries. In accordance with OJK Regulation No. 11/POJK.03/2016, OJK Regulation No. 34/POJK.03/2016, OJK Regulation No. 27 of 2022 concerning the Minimum Capital Requirement for Commercial Banks and OJK Circular Letter No.9/SEOJK.03/2020 on Transparency and Publication Conventional Commercial Bank Report, since the end of September 2016, Specific Reserves can no longer be taken into account as a component of Bank's Capital.

61. INFORMASI TAMBAHAN YANG TIDAK DIPERSYARATKAN OLEH STANDAR AKUNTANSI KEUANGAN INDONESIA (lanjutan)

Informasi tambahan yang disajikan di bawah ini merupakan informasi yang disyaratkan oleh regulasi dan/atau pengungkapan tambahan yang dibuat oleh Grup, yang bukan merupakan informasi yang dipersyaratkan oleh Standar Akuntansi Keuangan Indonesia: (lanjutan)

o. Manajemen modal (lanjutan)

Rasio Liabilitas Penyediaan Modal Minimum (lanjutan)

Rasio Kecukupan Modal (hanya BNI) pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

61. ADDITIONAL INFORMATION THAT IS NOT REQUIRED BY INDONESIAN FINANCIAL ACCOUNTING STANDARDS *(continued)*

The following additional information presented below is information required by regulations and/or additional disclosure prepared by the Group, and is not information required by Indonesian Financial Accounting Standards: (continued)

o. Capital management *(continued)*

Capital Adequacy Ratio (continued)

The Capital Adequacy Ratio of BNI (BNI only) as of 31 December 2025 and 2024 is as follows:

	2025	2024	
BNI - tanpa memperhitungkan risiko pasar			***BNI - without considering market risk***
Aset Tertimbang Menurut Risiko	749,998,108	660,200,271	*Risk Weighted Assets*
Total Modal	165,630,093	152,307,417	*Total Capital*
Rasio Liabilitas Penyediaan Modal Minimum BNI	22.08%	23.07%	*Capital Adequacy Ratio*
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Otoritas Jasa Keuangan	9.95%	9.80%	*Minimum Capital Adequacy Ratio required by Financial Service Authority*
BNI - dengan memperhitungkan risiko pasar dan kredit			***BNI - considering market and credit risks***
Aset Tertimbang Menurut Risiko	761,221,091	674,362,768	*Risk Weighted Assets*
Total Modal	165,630,093	152,307,417	*Total Capital*
Rasio Liabilitas Penyediaan Modal Minimum BNI	21.76%	22.59%	*Capital Adequacy Ratio*
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Otoritas Jasa Keuangan	9.95%	9.80%	*Minimum Capital Adequacy Ratio required by Financial Service Authority*
BNI - dengan memperhitungkan risiko operasional, mulai berlaku sejak 1 Januari 2010			***BNI - considering operational risk, effective since 1 January 2010***
Aset Tertimbang Menurut Risiko	801,605,046	711,773,633	*Risk Weighted Assets*
Total Modal	165,630,093	152,307,417	*Total Capital*
Rasio Liabilitas Penyediaan Modal Minimum BNI	20.66%	21.40%	*Capital Adequacy Ratio*
Rasio Liabilitas Penyediaan Modal Minimum yang diwajibkan oleh Otoritas Jasa Keuangan	9.95%	9.80%	*Minimum Capital Adequacy Ratio required by Financial Service Authority*

62. PERISTIWA SETELAH PERIODE PELAPORAN

Berdasarkan Surat Kepala Badan Pengaturan Badan Usaha Milik Negara Republik Indonesia ("BP BUMN") No. S-18/BPU/01/2026 tanggal 6 Januari 2026 dan Surat PT Danantara Asset Management (Persero) ("DAM") No. SR.005/DI-DAM/DO/2026 tanggal 6 Januari 2026, yang keduanya ditujukan kepada Bank, BP BUMN dan DAM pada pokoknya menyampaikan bahwa pada tanggal 5 Januari 2026 telah dilaksanakan penandatanganan perjanjian pengalihan sebagian saham seri B milik DAM pada Bank kepada BP BUMN.

Pengalihan saham milik DAM kepada BP BUMN dalam rangka pelaksanaan Undang-Undang Nomor 16 Tahun 2025 yang mengatur kepemilikan saham Negara melalui Kepala BP BUMN sebesar 1% (satu persen) dari total kepemilikan Negara Republik Indonesia baik secara langsung maupun tidak langsung pada Bank. Jumlah saham ini sebelum dan sesudah perolehan adalah sebagai berikut:

- Sebelum: 434.012.799 (empat ratus tiga puluh empat juta dua belas ribu tujuh ratus sembilan puluh sembilan) lembar saham seri B milik DAM.
- Sesudah: 223.783.877 (dua ratus dua puluh tiga juta tujuh ratus delapan puluh tiga ribu delapan ratus tujuh puluh tujuh) lembar saham Seri B milik BP BUMN dan 210.228.922 (dua ratus sepuluh juta dua ratus dua puluh delapan ribu sembilan ratus dua puluh dua) lembar saham seri B milik DAM.

Persentase kepemilikan saham sebelum dan sesudah perolehan adalah sebagai berikut:

- Sebelum: BP BUMN 0,0000% (nol koma nol nol nol nol persen), dan DAM 1,16% (satu koma satu enam persen) seri B dan 58,84% (lima puluh delapan koma delapan empat persen) seri C.
- Sesudah: BP BUMN 0,60% (nol koma enam nol persen), dan DAM 0,56% (nol koma lima enam persen) seri B dan 58,84% (lima puluh delapan koma delapan empat persen) seri C.

62. SUBSEQUENT EVENT

Based on the Letter of the Head of the State-Owned Enterprises Regulatory Agency of the Republic of Indonesia ("BP BUMN") No. S-18/BPU/01/2026 dated 6 January 2026 and the Letter of PT Danantara Asset Management (Persero) ("DAM") No. SR.005/DI-DAM/DO/2026 dated 6 January 2026, both addressed to the Bank, BP BUMN and DAM essentially conveyed that on 5 January 2026 a share transfer agreement had been executed for the transfer of a portion of DAM's Series B shares in the Bank to BP BUMN.

Transfer of shares owned by DAM to BP BUMN in the context of the implementation of Law Number 16 of 2025 which require the State, through the Head of BP BUMN to hold a 1% (one percent) of the total ownership of the Republic of Indonesia, whether directly or indirectly, in the Bank. These number of shares before and after the acquisition is as follows:

- *Before: 434,012,799 (four hundred thirty-four million twelve thousand seven hundred ninety-nine) Series B shares held by DAM.*
- *After: 223,783,877 (two hundred twenty-three million seven hundred eighty-three thousand eight hundred seventy-seven) Series B shares held by BP BUMN and 210,228,922 (two hundred ten million two hundred twenty-eight thousand nine hundred twenty-two) Series B shares held by DAM.*

The percentage of share ownership before and after the acquisition is as follows:

- *Before: BP BUMN 0.0000% (zero point zero zero zero zero percent), and DAM 1.16% (one point one six percent) in Series B shares and 58.84% (fifty-eight point eight four percent) in Series C shares.*
- *After: BP BUMN 0.60% (zero point six zero percent), and DAM 0.56% (zero point five six percent) in Series B shares and 58.84% (fifty-eight point eight four percent) in Series C shares.*

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	2025	2024	
ASET			***ASSETS***
Kas	13,257,078	13,616,467	*Cash*
Giro pada Bank Indonesia	78,559,909	50,993,488	*Current accounts with Bank Indonesia*
Giro pada bank lain	25,470,463	21,826,713	*Current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(5)	(6)	*Less: Allowance for impairment losses*
	25,470,458	21,826,707	
Penempatan pada bank lain dan Bank Indonesia	29,648,913	13,173,121	*Placements with other banks and Bank Indonesia*
Dikurangi: Cadangan kerugian penurunan nilai	(3)	(6)	*Less: Allowance for impairment losses*
	29,648,910	13,173,115	
Efek-efek	51,646,738	40,837,596	*Marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai	(15)	(270)	*Less: Allowance for impairment losses*
	51,646,723	40,837,326	
Efek-efek yang dibeli dengan janji dijual kembali	6,112,945	7,281,260	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	13,487,761	13,295,854	*Bills and other receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(67,957)	(52,828)	*Less: Allowance for impairment losses*
	13,419,804	13,243,026	
Tagihan akseptasi	19,559,625	16,002,813	*Acceptance receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(133,864)	(93,171)	*Less: Allowance for impairment losses*
	19,425,761	15,909,642	
Tagihan derivatif	5,422,349	1,792,978	*Derivative receivables*
Pinjaman yang diberikan	883,013,377	761,550,303	*Loans*
Dikurangi: Cadangan kerugian penurunan nilai	(35,090,063)	(38,328,597)	*Less: Allowance for impairment losses*
	847,923,314	723,221,706	
Obligasi Pemerintah setelah penyesuaian amortisasi diskonto dan premi	141,527,481	112,491,067	*Government Bonds adjusted for amortization of discount and premium*
Dikurangi: Cadangan kerugian penurunan nilai	(2,475)	(2,988)	*Less: Allowance for impairment losses*
	141,525,006	112,488,079	
Pajak dibayar di muka	3,065,809	-	*Prepaid taxes*
Beban dibayar di muka	2,129,904	2,805,977	*Prepaid expenses*
Investasi pada entitas asosiasi	14,354,281	12,748,127	*Investment in associates*
Penyertaan saham - bersih	5,951,754	5,952,954	*Equity investments - net*
Aset lain-lain - bersih	16,254,947	12,198,918	*Other assets - net*
Aset tetap	49,204,896	47,342,360	*Fixed assets*
Dikurangi: Akumulasi penyusutan	(18,907,776)	(17,793,691)	*Less: Accumulated depreciation*
	30,297,120	29,548,669	
Aset pajak tangguhan - bersih	1,867,674	6,786,150	*Deferred tax assets - net*
TOTAL ASET	**1,306,333,746**	**1,084,424,589**	***TOTAL ASSETS***

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	2025	2024	
LIABILITAS DAN EKUITAS			***LIABILITIES AND EQUITY***
LIABILITAS			***LIABILITIES***
Liabilitas segera	5,739,590	5,486,691	*Obligations due immediately*
Simpanan nasabah	1,021,895,200	792,672,134	*Deposits from customers*
Simpanan dari bank lain	11,546,000	18,513,894	*Deposits from other banks*
Liabilitas derivatif	5,398,899	1,479,185	*Derivative payables*
Efek-efek yang dijual dengan janji dibeli kembali	7,251,381	15,890,945	*Securities sold under agreements to repurchase*
Liabilitas akseptasi	2,301,384	4,213,527	*Acceptance payables*
Beban yang masih harus dibayar	609,861	1,264,319	*Accrued expenses*
Utang pajak			*Taxes payable*
- Pajak penghasilan badan	225,010	202,599	*Corporate income tax* -
- Pajak lainnya	96,779	84,312	*Other taxes* -
Total utang pajak	321,789	286,911	*Total taxes payable*
Imbalan kerja	8,540,038	6,877,242	*Employee benefits*
Penyisihan	1,463,072	2,283,222	*Provision*
Liabilitas lain-lain	4,964,338	7,023,812	*Other liabilities*
Efek-efek yang diterbitkan	14,346,025	13,045,283	*Securities issued*
Pinjaman yang diterima	35,657,115	39,586,461	*Borrowings*
Efek-efek subordinasi	18,339,988	17,699,183	*Subordinated securities*
TOTAL LIABILITAS	**1,138,374,680**	**926,322,809**	***TOTAL LIABILITIES***

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	2025	2024	
EKUITAS			***EQUITY***
Modal saham:			*Share capital:*
- Seri A Dwiwarna - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)			*Class A Dwiwarna - Rp3,750 par value per share (in full Rupiah amount)* -
- Seri B - nilai nominal Rp3.750 per saham (dalam Rupiah penuh)			*Class B – Rp3,750 par value per share (in full Rupiah amount)* -
- Seri C - nilai nominal Rp187,5 per saham (dalam Rupiah penuh)			*Class C – Rp187.5 par value per share (in full Rupiah amount)* -
Modal dasar:			*Share capital - Authorised:*
- Seri A Dwiwarna - 1 saham			*Class A Dwiwarna - 1 share* -
- Seri B – 578.683.733 saham			*Class B – 578,683,733 shares* -
- Seri C – 68.426.325.320 saham			*Class C – 68,426,325,320 shares* -
Modal ditempatkan dan disetor penuh:			*Issued and fully paid:*
- Seri A Dwiwarna - 1 saham			*Class A Dwiwarna - 1 share* -
- Seri B – 578.683.733 saham			*Class B – 578,683,733 shares* -
- Seri C – 36.678.114.582 saham	9,054,807	9,054,807	*Class C – 36,678,114,582 shares* -
Tambahan modal disetor	19,633,584	19,633,584	*Additional paid-in capital*
Cadangan pembayaran berbasis saham	349,167	322,589	*Share-based payment reserve*
Cadangan revaluasi aset	16,646,723	16,646,723	*Asset revaluation reserve*
Kerugian yang belum direalisasi atas efek-efek dan Obligasi Pemerintah dalam kelompok tersedia untuk dijual, setelah pajak	2,511,977	(1,426,665)	*Unrealised loss on available-for-sale marketable securities and Government Bonds, net of tax*
Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing	(125,441)	(97,232)	*Exchange difference in translation of foreign currency financial statements*
Saldo laba			*Retained earnings*
Sudah ditentukan penggunaannya			*Appropriated*
Cadangan umum dan wajib	2,778,412	2,778,412	*General and legal reserves*
Cadangan khusus		-	*Specific reserves*
Tidak ditentukan penggunaannya	117,109,837	111,189,562	*Unappropriated*
	119,888,249	113,967,974	
Saham treasuri	-	-	*Treasury shares*
TOTAL EKUITAS	**167,959,066**	**158,101,780**	***TOTAL EQUITY***
TOTAL LIABILITAS DAN EKUITAS	**1,306,333,746**	**1,084,424,589**	***TOTAL LIABILITIES AND EQUITY***

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LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
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STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
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	2025	2024	
PENDAPATAN BUNGA	67,338,231	64,923,225	***INTEREST INCOME***
BEBAN BUNGA	(28,093,870)	(25,435,146)	***INTEREST EXPENSE***
PENDAPATAN BUNGA - BERSIH	**39,244,361**	**39,488,079**	***INTEREST INCOME - NET***
PENDAPATAN OPERASIONAL LAINNYA	11,156,009	10,551,324	***OTHER OPERATING INCOME***
Provisi dan komisi lainnya	1,764,461	1,629,349	*Other fee and commission*
Laba dari entitas asosiasi			*Income from investment in associates*
Penerimaan kembali aset yang telah dihapusbukukan	5,438,988	6,025,183	*Recovery of assets written off*
Keuntungan yang belum direalisasi dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui laba rugi	110,363	121,796	*Unrealised gain on changes in fair value of financial assets at fair through profit or loss*
Keuntungan dari penjualan aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan nilai wajar melalui laba rugi	2,844,152	1,737,167	*Gain on sale of financial assets at fair value through comprehensive income and fair value through profit or loss*
Laba selisih kurs - bersih	1,038,679	1,261,260	*Foreign exchange gains – net*
Lain-lain	997,254	491,696	*Others*
TOTAL PENDAPATAN OPERASIONAL LAINNYA	**23,349,906**	**21,817,775**	***TOTAL OTHER OPERATING INCOME***
PEMBENTUKAN CADANGAN KERUGIAN PENURUNAN NILAI	**(8,962,192)**	**(7,980,678)**	***ALLOWANCE FOR IMPAIRMENT LOSSES***
BEBAN OPERASIONAL LAINNYA			***OTHER OPERATING EXPENSES***
Gaji dan tunjangan	(13,571,100)	(12,859,782)	*Salaries and employees' benefits*
Umum dan administrasi	(8,682,046)	(8,313,035)	*General and administrative*
Beban promosi	(1,146,975)	(1,048,227)	*Promotion expense*
Premi penjaminan	(1,703,849)	(1,567,476)	*Guarantee premium*
Lain-lain	(3,988,843)	(3,557,167)	*Others*
TOTAL BEBAN OPERASIONAL LAINNYA	**(29,092,813)**	**(27,345,687)**	***TOTAL OPERATING EXPENSES***
LABA OPERASIONAL	**24,539,262**	**25,979,489**	***OPERATING INCOME***
PENDAPATAN/(BEBAN) BUKAN OPERASIONAL - BERSIH	**15,848**	**85,290**	***NON-OPERATING INCOME/(EXPENSES) - NET***
LABA SEBELUM BEBAN PAJAK	**24,555,110**	**26,064,779**	***INCOME BEFORE TAX EXPENSE***
BEBAN PAJAK			***TAX EXPENSE***
Kini	-	(4,447,711)	*Current*
Tangguhan	(4,205,136)	(410,731)	*Deferred*
TOTAL BEBAN PAJAK	(4,205,136)	(4,858,442)	***TOTAL TAX EXPENSE***
LABA TAHUN BERJALAN	**20,349,974**	**21,206,337**	***INCOME FOR THE YEAR***

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LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
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STATEMENTS OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
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	2025	2024	
LABA TAHUN BERJALAN	**20,349,974**	**21,206,337**	***INCOME FOR THE YEAR***
PENGHASILAN KOMPREHENSIF LAIN:			***OTHER COMPREHENSIVE INCOME:***
Pos-pos yang tidak akan direklasifikasi ke laba rugi			***Items that will not be reclassified to profit or loss***
Keuntungan revaluasi aset tetap	-	1,263,566	*Gain on revaluation of fixed assets*
Pengukuran kembali liabilitas imbalan kerja	(590,569)	517,551	*Remeasurement of post employment benefit*
Pajak penghasilan terkait dengan komponen pendapatan komprehensif lain	112,209	(98,335)	*Income tax relating to components of other comprehensive income*
Pos-pos yang akan direklasifikasi ke laba rugi			***Items that will be reclassified to profit or loss***
Penyesuaian akibat penjabaran laporan keuangan dalam mata uang asing	(28,209)	(38,309)	*Translation adjustment of foreign currency financial statements*
Keuntungan/(kerugian) dari perubahan nilai wajar aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain	4,862,521	(576,904)	*Gain/(losses) on changes in fair value of financial assets at fair value through other comprehensive income*
Pajak penghasilan terkait dengan komponen pendapatan komprehensif lain	(923,879)	109,612	*Income tax relating to components of other comprehensive income*
LABA KOMPREHENSIF LAIN TAHUN BERJALAN SETELAH PAJAK	**3,432,073**	**1,177,181**	***OTHER COMPREHENSIVE INCOME FOR THE YEAR AFTER TAXES***
TOTAL LABA KOMPREHENSIF TAHUN BERJALAN	**23,782,047**	**22,383,518**	***TOTAL COMPREHENSIVE INCOME FOR THE YEAR***

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LAPORAN PERUBAHAN EKUITAS UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2025 DAN 2024
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STATEMENTS OF CHANGES IN EQUITY FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Laba yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui Penghasilan komprehensif lain setelah pajak/ *Unrealised gain on marketable securities and Government Bonds, at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference from translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Cadangan kompensasi berbasis saham/ *Share-based compensation reserve*	Total ekuitas/ *Total equity*	
						Dicadangkan/ *Appropriated*				
						Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated*)*			
Saldo pada tanggal 31 Desember 2024	**9,054,807**	**19,633,584**	**(1,426,665)**	**(97,232)**	**16,646,723**	**2,778,412**	**111,189,562**	**322,589**	**158,101,780**	***Balance as of 31 December 2024***
Laba tahun berjalan	-	-	-	-	-	-	19,871,614	-	19,871,614	*Income for the year*
Laba komprehensif lainnya untuk tahun berjalan	-	-	3,938,642	(28,209)	-	-	-	-	3,910,433	*Other comprehensive income for the year*
Pembagian dividen	-	-	-	-	-	-	(13,951,339)	-	(13,951,339)	*Distribution of dividends*
Saham treasuri	-	-	-	-	-	-	-	-	-	*Treasury shares*
Cadangan pembayaran berbasis saham	-	-	-	-	-	-	-	26,578	26,578	*Share-based payment reserve*
Saldo pada tanggal 31 Desember 2025	**9,054,807**	**19,633,584**	**2,511,977**	**(125,441)**	**16,646,723**	**2,778,412**	**117,109,837**	**349,167**	**167,959,066**	***Balance as of 31 December 2025***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

*) *Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN PERUBAHAN EKUITAS UNTUK TAHUN-TAHUN YANG BERAKHIR 31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CHANGES IN EQUITY FOR THE YEARS ENDED 31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	Modal ditempatkan dan disetor penuh/ *Issued and fully paid-up capital*	Tambahan modal disetor/ *Additional paid-in capital*	Rugi yang belum direalisasi atas efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain setelah pajak/ *Unrealised losses on marketable securities and Government Bonds, at fair value through other comprehensive income - net of tax*	Selisih kurs karena penjabaran laporan keuangan dalam mata uang asing/ *Exchange difference from translation of foreign currency financial statements*	Cadangan revaluasi aset/ *Asset revaluation reserve*	Saldo laba/*Retained earnings*		Saham treasuri/ *Treasury shares*	Cadangan kompensasi berbasis saham/ *Share-based compensation reserve*	Total ekuitas/ *Total equity*	
						Dicadangkan/ *Appropriated*					
						Cadangan umum dan wajib/ *General and legal reserves*	Tidak dicadangkan/ *Unappropriated*)*				
Saldo pada tanggal 31 Desember 2023	**9,054,807**	**19,633,584**	**(959,372)**	**(58,923)**	**15,383,157**	**2,778,412**	**100,018,746**	**(179,960)**	**260,116**	**145,930,567**	***Balance as of 31 December 2023***
Laba tahun berjalan	-	-	-	-	-	-	21,625,554	-	-	21,625,554	*Income for the year*
Laba komprehensif lainnya untuk tahun berjalan	-	-	(467,293)	(38,309)	1,263,566	-	-	-	-	757,964	*Other comprehensive income for the year*
Pembagian dividen	-	-	-	-	-	-	(10,454,738)	-	-	(10,454,738)	*Distribution of dividends*
Saham treasuri	-	-	-	-	-	-	-	179,960	-	179,960	*Treasury shares*
Cadangan pembayaran berbasis saham	-	-	-	-	-	-	-	-	62,473	62,473	*Share-based payment reserve*
Saldo pada tanggal 31 Desember 2024	**9,054,807**	**19,633,584**	**(1,426,665)**	**(97,232)**	**16,646,723**	**2,778,412**	**111,189,562**	**-**	**322,589**	**158,101,780**	***Balance as of 31 December 2024***

*) Termasuk di dalam saldo laba tidak dicadangkan adalah pengukuran kembali liabilitas imbalan kerja.

*) *Included in unappropriated retained earnings is the remeasurement of post employment benefit.*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN ARUS KAS
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	2025	2024	
ARUS KAS DARI AKTIVITAS OPERASI			***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan pendapatan bunga	66,433,683	64,637,509	*Receipts from interest income*
Pembayaran beban bunga	(25,728,800)	(25,435,146)	*Payments of interest expense*
Pendapatan operasional lainnya	21,613,420	24,866,571	*Other operating income*
Beban operasional lainnya	(22,635,361)	(24,084,564)	*Other operating expenses*
Pendapatan (beban) bukan operasional – bersih	15,848	85,290	*Non-operating income (expense) - net*
Pembayaran pajak penghasilan	(3,043,398)	(4,297,912)	*Payment of income tax*
Arus kas sebelum perubahan dalam aset dan liabilitas operasi	**36,655,392**	**35,771,748**	***Cash flows before changes in operating assets and liabilities***
Perubahan dalam aset dan liabilitas operasi:			***Changes in operating assets and liabilities:***
(Kenaikan)/penurunan aset operasi:			*(Increase)/decrease in operating assets:*
Penempatan pada Bank Indonesia dan bank lain	277,149	(324,265)	*Placements with Bank Indonesia and other banks*
Efek-efek dan Obligasi Pemerintah yang diukur pada nilai wajar melalui laporan laba rugi	(9,086,259)	(15,388,114)	*Marketable securities and Government Bonds at fair value through profit or loss*
Efek-efek yang dibeli dengan janji dijual kembali	1,168,315	2,667,326	*Securities purchased under agreements to resell*
Wesel ekspor dan tagihan lainnya	(191,907)	5,981,641	*Bills and other receivables*
Pinjaman yang diberikan	(136,861,060)	(92,306,852)	*Loans*
Tagihan akseptasi	(3,556,812)	1,541,976	*Acceptance receivables*
Biaya dibayar di muka	(655,419)	(137,121)	*Prepaid expenses*
Penempatan *term deposit* valas devisa hasil ekspor	509,168	1,631,138	*Foreign exchange term deposit from export activities*
Aset lain-lain	(2,517,847)	1,106,157	*Other assets*
(Penurunan)/kenaikan liabilitas operasi:			*(Decrease)/increase in operating liabilities:*
Liabilitas segera	252,899	337,242	*Obligations due immediately*
Simpanan nasabah	229,223,066	(9,036,727)	*Deposits from customers*
Simpanan dari bank lain	(6,967,894)	6,667,862	*Deposits from other banks*
Beban yang masih harus dibayar	(654,458)	(199,520)	*Accrued expenses*
Imbalan kerja	(3,902,873)	(3,143,934)	*Employee benefits*
Liabilitas akseptasi	(1,912,143)	(1,511,133)	*Acceptance payables*
Utang pajak	12,467	(17,097)	*Taxes payable*
Kewajiban atas penempatan *term deposit* valas devisa hasil ekspor	(509,168)	(1,631,138)	*Liabilites related to foreign exchange term deposit from export activities*
Liabilitas lain-lain	(616,555)	1,673,893	*Other liabilities*
Kas bersih diperoleh dari/ (digunakan) untuk aktivitas operasi	**100,666,061**	**(66,316,918)**	***Net cash provided from/ (used in) operating activities***
ARUS KAS DARI AKTIVITAS INVESTASI			***CASH FLOWS FROM INVESTING ACTIVITIES***
Penjualan efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	92,908,114	92,241,948	*Proceed of marketable securities measured at fair value through other comprehensive income and amortised cost*
Pembelian efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	(93,107,417)	(93,951,947)	*Placement of marketable securities measured at fair value through other comprehensive income and amortised cost*

PT BANK NEGARA INDONESIA (PERSERO) Tbk
ENTITAS INDUK/*PARENT ENTITY*

LAPORAN ARUS KAS
UNTUK TAHUN-TAHUN YANG BERAKHIR
31 DESEMBER 2025 DAN 2024
(Disajikan dalam jutaan Rupiah, kecuali dinyatakan lain)

STATEMENTS OF CASH FLOWS
FOR THE YEARS ENDED
31 DECEMBER 2025 AND 2024
(Expressed in millions of Rupiah, unless otherwise stated)

	2025	2024	
ARUS KAS DARI AKTIVITAS INVESTASI (lanjutan)			***CASH FLOWS FROM INVESTING ACTIVITIES** (continued*
Penjualan dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	140,978,512	118,012,386	*Proceed from Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian dari Obligasi Pemerintah yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan biaya perolehan yang diamortisasi	(163,532,728)	(114,537,958)	*Placement of Government Bonds at fair value through other comprehensive income and amortised cost*
Pembelian aset tetap	(2,728,901)	(2,522,674)	*Acquisition of fixed assets*
Perolehan aset hak guna	-	-	*Acquisition of right-of-use assets*
Hasil penjualan aset tetap	5,337	2,343	*Proceeds from sale of fixed assets*
Kas bersih (digunakan) untuk diperoleh dari aktivitas investasi	**(25,477,083)**	**(755,902)**	***Net cash (used) in/ provided from investing activities***
ARUS KAS DARI AKTIVITAS PENDANAAN			***CASH FLOWS FROM FINANCING ACTIVITIES***
Penerimaan pinjaman yang diterima	27,124,766	26,387,881	*Receipt from borrowings*
Pembayaran pinjaman yang diterima	(32,584,808)	(16,277,534)	*Borrowings payment*
Penerimaan efek-efek yang dijual dengan janji dibeli kembali	4,821,302	9,351,740	*Proceed in securities sold under agreements to repurchase*
Pembayaran efek-efek yang dijual dengan janji dibeli kembali	(13,607,006)	(920,846)	*Payment of securities sold under agreements to repurchase*
Penerimaan efek-efek yang diterbitkan	5,013,486	8,187,500	*Receipt in securities issued*
Pembiayaan efek-efek yang diterbitkan	(4,000,000)	-	*Payment in securities issued*
Pembayaran liabilitas sewa	(504,977)	(891,782)	*Payment of lease liability*
Pembayaran dividen	(13,951,339)	(10,454,738)	*Payment of dividends*
Kas bersih (digunakan) untuk/ diperoleh dari aktivitas pendanaan	**(27,688,576)**	**15,382,221**	***Net cash (used) in/ provided from financing activities***
KENAIKAN/(PENURUNAN) BERSIH KAS DAN SETARA KAS	**47,500,402**	**(51,690,599)**	***NET INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN	**99,162,348**	**150,884,688**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR***
Pengaruh perubahan kurs mata uang asing	103,321	(31,741)	*Effect of foreign currency exchange rate changes*
KAS DAN SETARA KAS PADA AKHIR TAHUN	**146,766,071**	**99,162,348**	***CASH AND CASH EQUIVALENTS AT END OF YEAR***

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas adalah sebagai berikut:

Changes in liabilities arising from financing activities in the cash flow statement is as follows:

	1 Januari/ *January* 2025	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember / *December* 2025	
Pinjaman yang diterima	39,586,461	(5,460,042)	1,530,696	35,657,115	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	15,890,945	(8,785,704)	146,140	7,251,381	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	13,045,283	1,013,486	287,256	14,346,025	*Securities issued*
Efek-efek subordinasi	17,699,184	-	640,804	18,339,988	*Subordinated securities*
Pembayaran dividen	-	(13,951,339)	13,951,339	-	*Payment of dividends*
Liabilitas sewa	976,195	(504,977)	65,707	536,925	*Lease liabilities*
	87,198,068	**(27,688,576)**	**16,621,942**	**76,131,434**	

	1 Januari/ *January* 2024	Arus kas/ *Cash flow*	Lain-lain/ *Others*	31 Desember/ *December* 2024	
Pinjaman yang diterima	29,919,191	10,110,347	(443,077)	39,586,461	*Borrowings*
Efek-efek yang dijual dengan janji dibeli kembali	6,891,177	8,430,894	568,874	15,890,945	*Securities sold under agreements to repurchase*
Efek-efek yang diterbitkan	4,998,280	8,187,500	(140,497)	13,045,283	*Securities issued*
Efek-efek subordinasi	16,928,731	-	770,453	17,699,184	*Subordinated securities*
Saham treasuri	(179,960)	-	179,960	-	*Treasury shares*
Pembayaran dividen	-	(10,454,738)	10,454,738	-	*Payment of dividends*
Liabilitas sewa	1,233,958	(891,782)	634,019	976,195	*Lease liabilities*
	59,791,377	**15,382,221**	**12,024,470**	**87,198,068**	

1. Ikhtisar kebijakan akuntansi yang penting

Dasar penyusunan laporan keuangan tersendiri entitas induk.

Laporan keuangan tersendiri entitas induk disusun sesuai dengan Pernyataan Standar Akuntansi Keuangan ("PSAK") 227, "Laporan Keuangan Tersendiri".

PSAK 227 mengatur dalam hal entitas menyajikan laporan keuangan tersendiri maka laporan tersebut hanya dapat disajikan sebagai informasi tambahan dalam laporan keuangan konsolidasian. Laporan keuangan tersendiri adalah laporan yang disajikan oleh entitas induk yang mencatat investasi pada entitas anak, entitas asosiasi, dan pengendalian bersama entitas berdasarkan kepemilikan ekuitas langsung bukan berdasarkan pelaporan hasil dan aset bersih *investee*.

Kebijakan akuntansi yang diterapkan dalam penyusunan laporan keuangan tersendiri entitas induk adalah sama dengan kebijakan akuntansi yang diterapkan dalam penyusunan laporan keuangan konsolidasian sebagaimana diungkapkan pada Catatan 2 atas laporan keuangan konsolidasian, kecuali untuk penyertaan pada Entitas Anak yang disajikan pada biaya perolehan.

2. Penyertaan Saham

Informasi mengenai Entitas Anak yang dimiliki Bank diungkapkan pada Catatan 1j atas laporan keuangan konsolidasian.

1. Summary of significant accounting policies

Basis of preparation of the separate financial statements of the parent entity.

The separate financial statements of the parent entity are prepared in accordance with the statement of Financial Accounting Standards ("SFAS") 227, "Separate Financial Statements".

SFAS 227 regulates that when an entity presents the separate financial statements, such financial statements should be presented as supplementary information to the consolidated financial statements. Separate financial statements are those presented by a parent entity, in which the investments of subsidiaries, associated entities and jointly controlled entities are accounted for on the basis of the direct equity interest rather than on the basis of the reported results and net assets of the investees.

Accounting policies adopted in the preparation of the parent entity separate financial statements are the same as the accounting policies adopted in the preparation of the consolidated financial statements as disclosed in Note 2 to the consolidated financial statements, except for investments in Subsidiaries which are stated at cost.

2. Equity Investment

Information pertaining to Subsidiaries of the Bank is disclosed in Note 1j to the consolidated financial statements.

SEOJK No. 16/SEOJK.04/2021: Annual Report of Public Company

Description			Page
I.	**General Provision**		
	1.	In this Financial Services Authority Circular Letter what is meant by:	
		a. The Annual Report is a report on the Board of Directors and Board of Commissioners accountability in managing and supervising issuers or public companies within a period of 1 (one) fiscal year to the general meeting of shareholders prepared based on the provisions of the Financial Services Authority Regulation concerning the Annual Report of issuers or public companies	√
		b. Issuers are parties who make public offerings	√
		c. A Public Company is a company whose shares are owned by at least 300 (three hundred) shareholders and has a paid-up capital of at least Rp3,000,000,000.00 (three billion rupiah) or a number of shareholders and paid-up capital as determined by the Financial Services Authority	√
		d. A Public Company is an Issuer that has made a public offering of equity securities or a Publically- listed Company	√
		e. A Sustainability Report is a report published to the public that contains the economic, financial, social, and environmental performance of a financial service institution, Issuer, and Public Company in running a sustainable business	√
		f Board of Directors:	
		1) For an Issuer or a Public Company in the form of a limited liability company, it is the Board of Directors as referred to in the Financial Services Authority Regulation concerning the Board of Directors and Board of Commissioners of an Issuer or Public Company; and	√
		2) For an Issuer or a Public Company in the form of a legal entity other than a limited liability company, it is the body that carries out the management of the legal entity as referred to in the laws and regulations concerning the legal entity.	√
		g. Board of Commissioners:	
		1) For an Issuer or a Public Company in the form of a limited liability company, the Board of Commissioners as referred to in the Financial Services Authority Regulation concerning the Board of Directors and Board of Commissioners of an Issuer or Public Company; and	√
		2) For the Issuer or Public Company in the form of a legal entity other than a limited liability company, it is the body that supervises the legal entity as referred to in the laws and regulations concerning the legal entity.	√
		h. General Meeting of Shareholders hereinafter abbreviated as GMS:	
		1) For an Issuer or a Public Company in the form of a limited liability company, it is the GMS as referred to in the Financial Services Authority Regulation concerning the Planning and Organizing of the General Meeting of Shareholders of a Public Company; and	√
		2) For an Issuer or Public Company in the form of a legal entity other than a limited liability company, it is the body that has authority that is not given to any other body that carries out management and supervisory functions, within the limits specified in the legislation and/or articles of association governing the legal entity.	√
	2.	The Annual Report of Issuers or Public Companies is an important source of information for investors or shareholders as one of the basic considerations in making investment decisions and a means of supervision of Issuers or Public Companies.	√
	3.	Along with the development of the capital market and the increasing need for information disclosure by investors or shareholders, the Board of Directors and the Board of Commissioners are required to present quality, accurate, and accountable information through the Annual Reports of Issuers or Public Companies.	√
	4.	Annual Reports that are prepared regularly and informatively can provide convenience for investors or shareholders and stakeholders in obtaining the required information.	√
	5	This Financial Services Authority Circular is a guideline for Issuers or Public Companies that must be applied in preparing Annual Reports and Sustainability Reports.	√
II.	**Format of Annual Report**		
	1.	Annual Report should be presented in the printed format and in electronic document copy.	√
	2.	The printed version of the Annual Report should be printed on light-colored paper of fine quality, in A4 size, bound and can be reproduced in good quality.	√
	3.	The Annual Report may present information in the form of pictures, graphs, tables, and/or diagrams by including clear titles and/or descriptions, so that they are easy to read and understand.	√
	4.	The Annual Report presented in electronic document format is the Annual Report converted into pdf format.	√

Description	Page
III. Content of Annual Report	
1. Annual Report should contain at least the following information:	
a. Summary of key financial information;	24-27
b. Stock information (if any);	33-35
c. The Board of Directors report;	62-80
d. The Board of Commissioners report;	48-60
e. Profile of Issuer or Public Company;	86-235
f. Management discussion and analysis;	236-437
g. Corporate governance applied by the Issuer or Public Company;	648-1213
h. Corporate social and environmental responsibility of the Issuer or Public Company;	Sustainability Report
i. Audited annual report; and	1248-1583
j. Statement that the Board of Directors and the Board of Commissioners are fully responsible for the Annual Report;	84-85
2. Description of Content of Annual Report	
a. Summary of Key Financial Information	
Summary of Key Financial Information contains financial information presented in comparison with previous 3 (three) fiscal years or since commencement of business if the Issuers or the Public Company commencing the business less than 3 (three) years, at least contain:	
1) income/sales;	
2) gross profit;	
3) profit (loss);	
4) total profit (loss) attributable to equity holders of the parent entity and non-controlling interest;	
5) total comprehensive profit (loss);	
6) total comprehensive profit (loss) attributable to equity holders of the parent entity and non controlling interest;	
7) earning (loss) per share;	24-27
8) total assets;	
9) total liabilities;	
10) total equities;	
11) profit (loss) to total assets ratio;	
12) profit (loss) to equities ratio;	
13) profit (loss) to income ratio;	
14) current ratio;	
15) liabilities to equities ratio;	
16) liabilities to total assets ratio; and	
17) other information and financial ratios relevant to the Issuer or Public Company and type of industry;	
b. Stock Information	
Stock Information (if any) at least contains:	
1) shares issued for each three-month period in the last 2 (two) fiscal years (if any), at least covering:	
a) number of outstanding shares;	
b) market capitalization based on the price at the Stock Exchange where the shares listed on;	
c) highest share price, lowest share price, closing share price at the Stock Exchange where the shares listed on; and	33-35
d) share volume at the Stock Exchange where the shares listed on;	
Information in point a) should be disclosed by the Issuer, the public company whose shares is listed or not listed in the Stock Exchange;	
Information in point b), point c), and point d) only be disclosed if the Issuer is a public company whose shares is listed in the Stock Exchange;	

Description			Page
	2)	in the event of corporate actions, including stock split, reverse stock, dividend, bonus share, and change in par value of shares, then the share price referred to in point 1), should be added with explanation on:	35
		a) date of corporate action;	
		b) stock split ratio, reverse stock, dividend, bonus shares, and change in par value of shares;	
		c) number of outstanding shares prior to and after corporate action; and	
		d) The number of convertible securities exercised (if any); and	
		e) share price prior to and after corporate action;	
	3)	in the event that the company's shares were suspended and/or delisted from trading during the year under review, then the Issuers or Public Company should provide explanation on the reason for the suspension and/or delisting; and	35
	4)	in the event that the suspension and/or delisting as referred to in point 3) was still in effect until the date of the Annual Report, then the Issuer or the Public Company should also explain the corporate actions taken by the company in resolving the suspension and/or delisting;	35
c.	The Board of Directors Report		
	The Board of Directors Report should at least contain the following items:		
	1)	the performance of the Issuer or Public Company, at least covering:	
		a) strategy and strategic policies of the Issuer or Public Company;	64-65
		b) Role of the Board of Directors in formulating strategies and strategic policies of Issuers or Public Companies;	65-66
		c) Process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy;	66
		d) comparison between achievement of results and targets; and	67
		e) challenges faced by the Issuer or Public Company;	67-68
	2)	description on business prospects;	73-74
	3)	implementation of good corporate governance by Issuer or Public Company; and	74-75
	4)	changes in the composition of the Board of Directors and the reason behind (if any);	78-79
d.	The Board of Commissioners Report		
	The Board of Commissioners Report should at least contain the following items:		
	1)	Assessment on the performance of the Board of Directors in managing the Issuer or the Public Company;	50-51
	2)	Supervision on the implementation of the strategy of the Issuer or Public Company;	51-52
	3)	View on the business prospects of the Issuer or Public Company as established by the Board of Directors;	53
	4)	View on the implementation of the corporate governance by the Issuer or Public Company;	53-55
	5)	Changes in the composition of the Board of Commissioners and the reason behind (if any); and	59-60
e.	Profile of the Issuer or Public Company		
	Profile of the Issuer or Public Company should cover at least:		
	1)	Name of Issuer or Public Company, including change of name, reason of change, and the effective date of the change of name during the year under review;	88, 93
	2)	access to Issuer or Public Company, including branch office or representative office, where public can have access of information of the Issuer or Public Company, which include:	88
		a) Address;	
		b) Telephone number;	
		c) Facsimile number;	
		d) E-mail address; and	
		e) Website address;	
	3)	Brief history of the Issuer or Public Company;	92-93
	4)	Vision and mission of the Issuer or Public Company;	94-96
	5)	Line of business according to the latest Articles of Association, and types of products and/or services produced;	99-103
	6)	Operational area of the Issuer or Public Company	104-105
	7)	Structure of organization of the Issuer or Public Company in chart form, at least 1 (one) level below the Board of Directors, with the names and titles;	106-107

Description			Page
8)	List of industry association memberships both on a national and international scale related to the implementation of sustainable finance;		108-109
9)	The Board of Directors profiles include:		120-136
	a)	Name and short description of duties and functions;	
	b)	Latest photograph;	
	c)	Age;	
	d)	Citizenship;	
	e)	Education;	
	f)	history position, covering information on:	
		(1) Legal basis for appointment as member of the Board of Directors to the said Issuer or Public Company;	
		(2) Dual position, as member of the Board of Directors, member of the Board of Commissioners, and/or member of committee, and other position (if any); and	
		(3) Working experience and period in and outside the Issuer or Public Company;	
	g)	Affiliation with other members of the Board of Directors, members of the Board of Commissioners, majority and controlling shareholders, either directly or indirectly to individual owners, including names of affiliated parties. In the event that a member of the Board of Directors has no affiliation, the Issuer or Public Company shall disclose this matter; and	
	h)	Changes in the composition of the members of the Board of Directors and the reasons for the changes. In the event that there is no change in the composition of the members of the Board of Directors, this matter shall be disclosed;	
10)	The Board of Commissioners profiles, at least include:		110-119
	a)	Name;	
	b)	Latest photograph;	
	c)	Age;	
	d)	Citizenship;	
	e)	Education;	
	f)	History position, covering information on:	
		(1) Legal basis for the appointment as member of the Board of Commissioners who is not Independent Commissioner at the said Issuer or Public Company;	
		(2) Legal bases for the first appointment as member of the Board of Commissioners who also Independent Commissioner at the said Issuer or Public Company;	
		(3) Dual position; as member of the Board of Commissioners, member of the Board of Directors, and/or member of committee and other position (if any); and	
		(4) Working experience and period in and outside the Issuer or Public Company;	
	g)	Affiliation with other members of the Board of Commissioners, major shareholders, and controllers either directly or indirectly to individual owners, including names of affiliated parties; In the event that a member of the Board of Commissioners has no affiliation, the Issuer or Public Company shall disclose this matter;	
	h)	Statement of independence of Independent Commissioner in the event that the Independent Commissioner has been appointed more than 2 (two) periods (if any);	
	i)	Changes in the composition of the members of the Board of Commissioners and the reasons for the changes. In the event that there is no change in the composition of the members of the Board of Commissioners, this matter shall be disclosed;	
11)	In the event that there were changes in the composition of the Board of Commissioners and/or the Board of Directors occurring between the period after year-end until the date the Annual Report submitted, then the last and the previous composition of the Board of Commissioners and/or the Board of Directors shall be stated in the Annual Report;		137
12)	Number of employees by gender, position, age, education level, and employment status (permanent/ contracted) in the fiscal year; Disclosure of information can be presented in tabular form.		166-167
13)	Names of shareholders and ownership percentage at the end of the fiscal year, including:		180-183
	a)	Shareholders having 5% (five percent) or more shares of Issuer or Public Company;	
	b)	Commissioners and Directors who own shares of the Issuers or Public Company; and	
	c)	Groups of public shareholders, or groups of shareholders, each with less than 5% (five percent) ownership shares of the Issuers or Public Company;	
14)	The percentage of indirect ownership of the shares of the Issuer or Public Company by members of the Board of Directors and members of the Board of Commissioners at the beginning and end of the fiscal year, including information on shareholders registered in the shareholder register for the benefit of indirect ownership of members of the Board of Directors and members of the Board of Commissioners;		184-185

Description			Page
	15)	Number of shareholders and ownership percentage at the end of the fiscal year, based on:	186
		a) Ownership of local institutions;	
		b) Ownership of foreign institutions;	
		c) Ownership of local individual; and	
		d) Ownership of foreign individual;	
	16)	Information on major shareholders and controlling shareholders the Issuers of Public Company, directly or indirectly, and also individual shareholder, presented in the form of scheme or diagram;	187
	17)	Name of subsidiaries, associated companies, joint venture controlled by Issuers or Public Company, with entity, percentage of stock ownership, line of business, total assets and operating status of the Issuers of Public Company (if any);	188-199
		For subsidiaries, include the addresses of the said subsidiaries;	
	18)	Chronology of share listing, number of shares, par value, and bid price from the beginning of listing up to the end of the financial year, and name of Stock Exchange where the Issuers of Public Company shares are listed;	202-203
	19)	Other securities listing information other than the securities as referred to in number 18), which have not yet matured in the fiscal year, at least contain the name of the securities, year of issue, interest rate/yield, maturity date, offering value, and securities rating (if any);	204-217
	20)	Information on the use of a Public Accountant (AP) and a Public Accounting firm (KAP) services and their networks/associations/alliances include:	218-219
		a) name and address;	
		b) period of assignment;	
		c) informasi jasa audit dan/atau non audit yang diberikan;	
		d) Audit and/or non-audit fees for each assignment given during the fiscal year; and	
		e) In the event that AP and KAP and their network/association/alliance, which are appointed do not provide non-audit services, then the information is disclosed; and	
	21)	Name and address of capital market supporting institutions and/or professionals other than AP and KAP	220-221
f.		Management Discussion and Analysis	
		Management Analysis and Discussion Annual should contain discussion and analysis on financial statements and other material information emphasizing material changes that occurred during the year under review, at least including:	
	1)	Operational review per business segment, according to the type of industry of the Issuer or Public Company including:	249-320
		a) Production, including process, capacity, and growth;	
		b) Income/sales; and	
		c) Profitability;	
	2)	comprehensive financial performance analysis which includes a comparison between the financial performance of the last 2 (two) fiscal years, and explanation on the causes and effects of such changes, among others concerning:	322-350
		a) Current assets, non-current assets, and total assets;	
		b) Short term liabilities, long term liabilities, total liabilities;	
		c) Equities;	
		d) Sales/operating revenues, expenses and profit (loss), other comprehensive revenues, and total comprehensive profit (loss); and	
		e) Cash flows	
	3)	The capacity to pay debts by including the computation of relevant ratios;	360-361
	4)	Accounts receivable collectability of the Issuer or Public Company, including the computation of the relevant ratios;	362-364
	5)	Capital structure and management policies concerning capital structure, including the basis for determining the said policy;	375-376
	6)	discussion on material ties for the investment of capital goods, including the explanation on at least:	377-378
		a) The purpose of such ties;	
		b) Source of funds expected to fulfill the said ties;	
		c) Currency of denomination; and	
		d) Steps taken by the Issuer of Public Company to protect the position of a related foreign currency against risks;	

Description			Page
7)	Discussion on investment of capital goods which was realized in the last fiscal year, at least include:		379
	a)	Type of investment of capital goods;	
	b)	Objective of the investment of capital goods; and	
	c)	Value of the investment of capital goods;	
8)	Material Information and facts that occurring after the date of the accountant's report (if any);		380
9)	Information on the prospects of the Issuer or the Company in connection with industry,economy in general, accompanied with supporting quantitative data if there is a reliable data source;		388-392
10)	Comparison between target/projection at beginning of year and result (realization), concerning:		381-383
	a)	Income/sales;	
	b)	Profit (loss);	
	c)	Capital structure; or	
	d)	Dividend policy; or	
	e)	Others that deemed necessary for the Issuer or Public Company;	
11)	Target/projection at most for the next one year of the Issuer or Public Company, concerning:		393-394
	a)	Income/sales;	
	b)	Profit (loss);	
	c)	Capital structure; or	
	d)	Dividend policy;	
	e)	Or others that deemed necessary for the Issuer or Public Company;	
12)	Marketing aspects of the company's products and/or services the Issuer or Public Company, among others marketing strategy and market share;		395-398
13)	Description regarding the dividend policy during the last 2 (two) fiscal years, at least:		399-401
	a)	Dividend policy;	
	b)	The date of the payment of cash dividend and/or date of distribution of non-cash dividend;	
	c)	Amount of cash per share (cash and/or non cash); and	
	d)	Amount of dividend per year paid;	
	Disclosure of information can be presented in tabular form. In the event that the Issuer or Public Company does not distribute dividends in the last 2 (two) years, this matter shall be disclosed.		
14)	Use of proceeds from Public Offerings, under the condition of:		403-411
	a)	during the year under review, on which the Issuer has the obligation to report the realization of the use of proceeds, then the realization of the cumulative use of proceeds until the year end should be disclosed; and	
	b)	In the event that there were changes in the use of proceeds as stipulated in the Regulation of the Financial Services Authority on the Report of the Utilization of Proceeds from Public Offering, then Issuer should explain the said changes;	
15)	Material information (if any), among others concerning investment, expansion, divestment, acquisition, debt/capital restructuring, transactions with related parties and transactions with conflict of interest that occurred during the year under review, among others include:		413-421
	a)	Transaction date, value, and object;	
	b)	Name of transacting parties;	
	c)	Nature of related parties (if any);	
	d)	Description of the fairness of the transaction; and	
	e)	Compliance with related rules and regulations;	
	f)	In the event that there is an affiliation relationship, apart from disclosing the information as referred to in letter a) to letter e), the Issuer or Public Company also discloses information:	
		1) A statement from the Board of Directors that the affiliate transaction has gone through adequate procedures to ensure that the affiliate transaction is carried out in accordance with generally accepted business practices, by complying with the arms-length principle; and	
		2) The role of the Board of Commissioners and the audit committee in carrying out adequate procedures to ensure that affiliated transactions are carried out in accordance with generally accepted business practices, by complying with the arms-length principle;	
	g)	For affiliated transactions or material transactions which are business activities carried out to generate business income and are carried out regularly, repeatedly, and/or continuously, an explanation is added that the affiliated transactions or material transactions are business activities carried out to generate operating income. and run regularly, repeatedly, and/or continuously;	

Description	Page
h) For disclosure of affiliated transactions and/or conflict of interest transactions resulting from the implementation of affiliated transactions and/or conflict of interest transactions that have been approved by independent shareholders, additional information regarding the date of the GMS which approved the affiliated transactions and/or conflict of interest transactions is added;	
i) In the event that there is no affiliated transaction and/or conflict of interest transaction, then this shall be disclosed;	
16) Changes in regulation which have a significant effect on the Issuer or Public Company and impacts on the company (if any); and	423-432
17) Changes in the accounting policy, rationale and impact on the financial statement (if any);	433
g. Corporate Governance of the Issuer or Public Company	
Corporate Governance of the Issuer or Public Company contains at least:	
1) GMS, at least contains:	
a) Information regarding the resolutions of the GMS in the fiscal year and 1 (one) year prior to the fiscal year include:	
1) Resolutions of the GMS in the fiscal year and 1 (one) year before the fiscal year realized in the fiscal year; and	673-698
2) Resolutions of the GMS in the fiscal year and 1 (one) year before the fiscal year that have not been realized and the reasons for not realizing them;	
b) In the event that the Issuer or Public Company uses an independent party in the conduct of the GMS to calculate the votes, then this matter shall be disclosed;	
2) The Board of Directors, covering:	
a) The tasks and responsibilities of each member of the Board of Directors;	
b) Statement that the Board of Directors has already have board manual or charter;	
c) Policies and implementation of the frequency of meetings of the Board of Directors, meetings of the Board of Directors with the Board of Commissioners, and the level of attendance of members of the Board of Directors in the meeting including attendance at the GMS;	
d) Training and/or competency development of members of the Board of Directors:	
(1) Policies for training and/or improving the competence of members of the Board of Directors, including an orientation program for newly appointed members of the Board of Directors (if any); and	742-805
(2) Training and/or competency improvement attended by members of the Board of Directors in the fiscal year (if any);	
e) The Board of Directors' assessment of the performance of the committees that support the implementation of the Board of Directors' duties for the fiscal year shall at least contain:	
(1) Performance appraisal procedures; and	
(2) The criteria used are performance achievements during the fiscal year, are competence and attendance at meetings; and	
f) In the event that the Issuer or Public Company does not have a committee that supports the implementation of the duties of the Board of Directors, this matter shall be disclosed.	
3) The Board of Commissioners, among others include:	
a) Duties and responsibilities of the Board of Commissioners;	
b) Statement that the Board of Commissioner has already have the board manual or charter;	
c) Policies and implementation of the frequency of meetings of the Board of Commissioners, meetings of the Board of Commissioners with the Board of Directors and the level of attendance of members of the Board of Commissioners in these meetings including attendance at the GMS;	
d) Training and/or competency improvement of members of the Board of Commissioners:	
(1) Policy on competency training and/or development of members of the Board of Commissioners, including orientation programs for newly appointed members of the Board of Commissioners (if any); and	
(2) Competency training and/or development attended by members of the Board of Commissioners in the fiscal year (if any);	699-741
e) The assessment on the performance of the Board of Directors and Board of Commissioners and the implementation, at least covering:	
(1) procedure for the implementation of performance assessment;	
(2) Criteria used are performance achievements during the fiscal year, competency and attendance at meetings; and	
(3) Assessor;	
f) Board of Commissioners' assessment of the performance of the Committees that support the implementation of the duties of the Board of Commissioners in the fiscal year includes:	
(1) Performance appraisal procedures; and	
(2) The criteria used are performance achievements during the fiscal year, competency and attendance at meetings;	

Description			Page
4)	The nomination and remuneration of the Board of Directors and the Board of Commissioners shall at least contain:		811-826
	a)	Nomination procedure, including a brief description of the policies and process for nomination of members of the Board of Directors and/or members of the Board of Commissioners; and	
	b)	Procedures and implementation of remuneration for the Board of Directors and the Board of Commissioners, among others:	
		(1) Procedures for determining remuneration for the Board of Directors and the Board of Commissioners;	
		(2) The remuneration structure of the Board of Directors and the Board of Commissioners such as salary, allowances, tantiem/bonus and others; and	
		(3) The amount of remuneration for each member of the Board of Directors and member of the Board of Commissioners	
5)	Sharia Supervisory Board, for Issuer or Public Company that conduct business based on sharia law, as stipulated in the articles of association, at least containing:		N.A
	a)	name;	
	b)	Legal basis for the appointment of the sharia supervisory board;	
	c)	Period of assignment of the sharia supervisory board;	
	d)	duty and responsibility of Sharia Supervisory Board; and	
	e)	frequency and procedure in providing advice and suggestion, as well as the compliance of Sharia Principles by the Issuer or Public Company in the Capital Market;	
6)	Audit Committee, among others covering:		833-854
	a)	Name and position in the committee;	
	b)	Age;	
	c)	Citizenship;	
	d)	Education background;	
	e)	History of position; including:	
		(1) Legal basis for appointment as committee member;	
		(2) Dual position, as member of Board of Commissioners, member of Board of Directors, and/or member of committee, and other position (if any); and	
		(3) working experience and period in and outside the Issuer or Public Company;	
	f)	Period and terms of office of the member of Audit Committee;	
	g)	statement of independence of the Audit Committee;	
	h)	Training and/or competency improvement that have been followed in the fiscal year (if any);	
	i)	Policies and implementation of the frequency of audit committee meetings and the level of attendance of audit committee members in those meetings; and	
	j)	the activities of the Audit Committee in the year under review, in accordance with the Audit Committee Charter;	
7)	The nomination and remuneration committee or function of the Issuer or Public Company, at least containing:		855-868
	a)	Name and position in committee membership;	
	b)	Age;	
	c)	Nationality;	
	d)	Educational history;	
	e)	Position history, including information on:	
		(1) Legal basis for appointment as committee member;	
		(2) Concurrent positions, either as a member of the Board of Commissioners, member of the Board of Directors, and/or committee member and other positions (if any); and	
		(3) Work experience and period of time both inside and outside the Issuer or Public Company;	
	f)	Period and term of office of the committee members;	
	g)	Statement of committee independence;	
	h)	Training and/or competency improvement that have been followed in the fiscal year (if any);	
	i)	Description of duties and responsibilities;	
	j)	A statement that it has a guideline or charter;	
	k)	Policies and implementation of the frequency of meetings and the level of attendance of members at the meeting;	
	l)	Brief description of the implementation of activities in the fiscal year; and	
	m)	In the event that no nomination and remuneration committee is formed, the Issuer or Public Company is sufficient to disclose the information as referred to in letter i) to letter l) and disclose:	
		(1) Reasons for not forming the committee; and	
		(2) The party carrying out the nomination and remuneration function;	

Description			Page
8)	Other committees owned by Issuers or Public Companies in order to support the functions and tasks of the Board of Directors (if any) and / or committees that support the functions and duties of the Board of Commissioners, the least contains:		868-904, 911-951
	a)	Name and position in the Committee;	
	b)	Age;	
	c)	Citizenship;	
	d)	Education background;	
	e)	History of position, including:	
		(1) Legal basis for the appointment as member of the committee;	
		(2) Dual position, as member of Board of Commissioners, member of Board of Directors, and/or member of committee, and other position (if any); and	
		(3) Working experience and period in and outside the Issuer or Public Company;	
	f)	Period and terms of office of the member of Audit Committee;	
	g)	Statement of committee independence;	
	h)	Training and/or competency improvement that have been followed in the fiscal year (if any); and	
	i)	Description of duties and responsibilities;	
	j)	A statement that the committee has had guidelines or charters;	
	k)	Policies and implementation of the frequency of committee meetings and the level of attendance of committee members at the meeting; and	
	l)	A brief description of the committee's activities for the fiscal year;	
9)	Corporate Secretary, including:		951-958
	a)	name;	
	b)	domicile;	
	c)	history of position, including:	
		(1) legal basis for the appointment as Corporate Secretary; and	
		(2) working experience and period in and outside the Issuer or Public Company;	
	d)	education background;	
	e)	education and/or training during the year under review; and	
	f)	brief description on the implementation of duties of the Corporate Secretary in the year under review;	
10)	Internal Audit Unit, among others including:		958-980
	a)	Name of Head of Internal Audit Unit;	
	b)	History of position, including:	
		(1) Legal basis for the appointment as Head of Internal Audit Unit; and	
		(2) Working experience and period in and outside the Issuer or Public Company;	
	c)	Qualification or certification as internal auditor (if any);	
	d)	Education and/or training during the year under review;	
	e)	Structure and position of Internal Audit Unit;	
	f)	Description of duties and responsibilities;	
	g)	Statement that the Internal Audit Unit has already have Internal Audit Unit charter; and	
	h)	Brief description on the implementation of duty of Internal Audit Unit during the year under review;	
11)	Description on internal control system adopted by the Issuer or Public Company, at least covering:		996-1006
	a)	Financial and operational control, and compliance to the other prevailing rules; and	
	b)	Review on the effectiveness of internal control systems;	
	c)	Statement of the Board of Directors and/or Board of Commissioners on the adequacy of the internal control system;	
12)	Risk management system implemented by the company, at least includes:		1007-1023
	a)	General description about the company's risk management system the Issuer or Public Company;	
	b)	Types of risk and the management; and	
	c)	Review the effectiveness of the risk management system applied by the Issuer or Public Company;	
	d)	Statement of the Board of Directors and/or the Board of Commissioners or the audit committee on the adequacy of the risk management system;	

Description			Page
13)	Legal cases that have a material impact faced by Issuers or Public Companies, subsidiaries, members of the Board of Directors and members of the Board of Commissioners (if any), at least contain:		1031-1034
	a)	Substance of the case/claim;	
	b)	Status of settlement of case/claim; and	
	c)	Potential impacts on the condition of the Issuer or Public Company;	
14)	information about administrative sanctions imposed to Issuer or Public Company, members of the Board of Commissioners and the Board of Directors, by the Capital Market Authority and other authorities during the last fiscal year (if any);		1035-1036
15)	information about codes of conduct of the Issuer or Public Company, includes:		1097-1100
	a)	Key points of the code of conduct;	
	b)	Socialization of the code of conduct and enforcement; and	
	c)	Statement that the code of conduct is applicable for the Board of Commissioners, the Board of Directors, and employees of the Issuer of Public Company;	
16)	A brief description of the policy of providing long-term performance-based compensation to management and/or employees owned by the Issuer or Public Company (if any), including the management stock ownership program (MSOP) and/or program employee stock ownership (ESOP); Information disclosed on the compensation in the form of a management stock ownership program (MSOP) and/or employee stock ownership program (ESOP) shall at least include:		1118-1122
	a)	Number of shares and/or options;	
	b)	Implementation period;	
	c)	Requirements for eligible employees and/or management; and	
	d)	Exercise price or determination of exercise price;	
17)	A brief description of the information disclosure policy regarding:		1123-1126
	a)	Share ownership of members of the Board of Directors and members of the Board of Commissioners no later than 3 (three) working days after the occurrence of ownership or any change in ownership of shares of a Public Company; and	
	b)	Implementation of the policy;	
18)	Description of whistleblowing system at the Issuer or Public Company (if any), among others include:		1127-1130
	a)	Mechanism for violation reporting;	
	b)	Protection for the whistleblower;	
	c)	Handling of violation reports;	
	d)	Unit responsible for handling of violation report; and	
	e)	Results from violation report handling, at least includes:	
		(1) Number of complaints received and processed during the fiscal year; and	
		(2) Follow up of complaints;	
19)	A description of the anti-corruption policy of the Issuer or Public Company, at least containing:		1087-1091
	a)	Programs and procedures implemented in overcoming corrupt practices, kickbacks, fraud, bribery and/or gratification in Issuers or Public Companies; and	
	b)	Anti-corruption training/socialization to employees of Issuers or Public Companies;	
20)	Implementation of the Guidelines of Corporate Governance for Public Companies for Issuer issuing Equity-based Securities or Public Company, including:		1152-1159
	a)	statement regarding recommendation that have been implemented; and/or	
	b)	description of recommendation that have not been implemented, along with the reason and alternatives of implementation (if any);	
h.	Social and Environmental Responsibility of the Issuer or Public Company		
1)	The information disclosed in the social and environmental responsibility section is a Sustainability Report as referred to in the Financial Services Authority Regulation Number 51/POJK.03/2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies, at at least includes:		Sustainability Report
	a)	Explanation of the sustainability strategy;	Sustainability Report
	b)	Overview of sustainability aspects (economic, social, and environmental);	Sustainability Report
	c)	Brief profile of the Issuer or Public Company;	Sustainability Report
	d)	Explanation of the Board of Directors;	Sustainability Report

Description				Page
		e)	Sustainability governance;	Sustainability Report
		f)	Sustainability performance;	Sustainability Report
		g)	Written verification from an independent party, if any;	Sustainability Report
		h)	Feedback sheet for readers, if any; and	Sustainability Report
		i)	The response of the Issuer or Public Company to the previous year's report feedback;	Sustainability Report
	2)	The Sustainability Report as referred to in number 1) must be prepared in accordance with the Technical Guidelines for the Preparation of a Sustainability Report for Issuers and Public Companies as contained in Appendix II which is an integral part of this Financial Services Authority Circular Letter;		√
	3)	Information on the Sustainability Report in number 1) can:		
		a)	Disclosed in other relevant sections outside the Social and Environmental Responsibility section, such as the Directors' explanation regarding the Sustainability Report disclosed in the section related to the Directors' Report; and/or	√
		b)	Refers to other sections outside the Social and Environmental Responsibility section by still referring to the Technical Guidelines for the Preparation of Sustainability Reports for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular Letter, such as the profile of the Issuer or Public Company;	√
	4)	The Sustainability Report as referred to in number 1) is an inseparable part of the Annual Report but can be presented separately from the Annual Report;		√
	5)	In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:		
		a)	Contains all the information as referred to in number 1); and	√
		b)	Prepared in accordance with the Technical Guidelines for the Preparation of a Sustainability Report for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular Letter;	√
	6)	In the event that the Sustainability Report is presented separately from the Annual Report, then the Social and Environmental Responsibility section contains information that information on Social and Environmental Responsibility has been disclosed in the Sustainability Report which is presented separately from the Annual Report; and		√
	7)	Submission of the Sustainability Report which is presented separately from the Annual Report must be submitted together with the Annual Report.		√
i	Audited Annual Financial Statement			
	Financial Statements included in Annual Report should be prepared in accordance with the Financial Accounting Standards in Indonesia and audited by an Accountant. The said financial statement should be included with statement of responsibility for financial report as stipulated in the legislations in the Capital Markets sector governing the responsibility of the Board of Directors on the financial report or the legislations in the Capital Markets sector governing the periodic reports of securities company in the event the Issuer is a Securities Company; and			1248-1583
j	Letter of Statement of the Board of Directors and the Board of Commissioners regarding the Responsibility for Annual Reporting			
	Letter of statement of the Board of Directors and the Board of Commissioners regarding the responsibility for Annual Reporting should be prepared according to the format of letter of statement of member of Board of Directors and the Board of Commissioners regarding the responsibility for Annual Reporting as attached in the Attachment, which is an integral part of this Circulation Letter of the Financial Services Authority.			84-85

To Financial Services Authority Circular Letter No. 29/SEOJK.03/2025: Transparency and Publication of Conventional Commercial Bank Reports

Description			Page
I.	**Statement Letter of the Board of Directors and the Board of Commissioners regarding Responsibility for Financial Publication Reports and Annual Financial Performance Information**		
II.	**General Information**		
	A. Key Financial Highlights		
	Financial Highlights presents financial information in a comparative format for 2 (two) financial years, or since the Bank begins its business for banks that have been in business for less than 2 (two) years. At the very least, financial highlights covers:		
	1.	Net interest income (expense)/yield;	25
	2.	Operating profit (loss);	25
	3.	Profit (loss) for the current year before tax;	25
	4.	Net profit (loss);	25
	5.	Total comprehensive income (loss);	26
	6.	Net income per share;	26
	7.	Total assets;	24
	8.	Total liabilities;	24
	9	Total equity;	25
	10.	Earning assets;	24
	11.	Third party funds;	24
	12.	Borrowings;	24
	13.	Securities issued;	24
	14.	KPMM ratio including ATMR figures;	26
	15.	Non-performing productive assets and non-performing non-productive assets to total productive assets and non-productive assets;	26
	16.	Non-performing productive assets to total productive assets;	26
	17.	CKPN financial assets to productive assets;	26
	18.	NPL gross;	26
	19.	NPL net;	26
	20.	KKR;	26
	21.	Return on Asset (ROA);	27
	22.	Return on Equity (ROE);	27
	23.	Net Interest Magin (NIM);	27
	24.	Profit (loss) to income ratio;	27
	25.	Operating Expenses to Operating Income Ratio (BOPO);	27
	26.	Cost to Income Ratio (CIR);	27
	27.	Loan to Deposit Ratio (LDR);	27
	28.	PPKA;	27
	29.	AYDA;	27
	30.	Percentage of violations and exceedances of the BMPK, including the amount and quality of funds provided or distributed to related parties in accordance with Financial Services Authority regulations regarding maximum credit limits;	27
	31.	Mandatory Minimum Reserves (GWM) Ratio;	27
	32.	Net Open Position (PDN) Ratio; and	27
	33.	Other information and ratios relevant to the banking industry.	27

Description	Page
B. Bank profile covers at the very least:	
1. Name of Bank, including if any, change of name, reason for the change, and effective date of name change in the financial year;	88, 93
2. Access to the Bank, including branch or representative offices, whereby the general public may obtain information on the Issuer or Public Company, comprising of:	
a. Address;	88
b. Telephone number;	88
c. E-mail address; and	88
d. Website address;	88
3. Brief profile of the Bank;	92-93
4. Vision and mission of the Bank (corporate culture) or value of the Bank;	94-96
5. Line(s) of business according to the latest articles of association, business activities performed in the Financial Year, and types of products and/or services provided;	99-103
6. The region or area where the Bank's operational activities are carried out or the scope of the Bank's operational activities;	104-105
7. The organizational structure of the Bank in the form of a chart, at least up to one (1) level below the board of directors, including committees under the board of directors (if any) and committees under the board of commissioners, accompanied by names and positions. The Bank discloses changes in the composition of the board of directors and/or board of commissioners along with the reasons for the changes (if any);	106-107
8. Shareholding structure and composition, that is, names of shareholders and percentage of shareownership, including:	
a Shareholders with a minimum of 5% (five percent) of shares of the Bank;	183
b Members of the Board of Directors and Board of Commissioners that own shares of the Bank;	184-185
c Public shareholders, that is, shareholders that each held less than 5% (five percent) of shares of the Bank;	183
d Information on the majority and controlling shareholder(s) of the Bank, direct or indirect, up to the individual ultimate shareholders, presented in a schematic diagram or chart;	187
Members of the Board of Directors and Board of Commissioners that own shares of the Bank;	184-185
9. Name of subsidiaries, associated company or joint venture company where the Bank exercise a joint control with the entity, along with the percentage of shareownership, lines of business, total assets, and operating status of the subsidiaries (if any);	188-199
10. For subsidiaries, include information on address of such subsidiaries;	190-195
11. Profiles of the Board of Directors and the Board of Commissioners, covering at least	
a. Composition of the Board of Directors and the Board of Commissioners, along with the position and brief resume of the respective members thereof;	110-119, 120-136
b. Names and position according to the duties and responsibilities;	
c. Latest photograph;	
d. Age;	
e. Nationality;	
f. Education background and/or certification;	
g. Work history, including information on:	
i. Legal basis of appointment as member of the Board of Directors and Board of Commissioner of the Bank	
ii. concurrent positions in accordance with the Financial Services Authority's provisions on the implementation of governance for commercial banks. In the event that members of the board of directors and board of commissioners do not hold concurrent positions, this shall be disclosed; and	
iii. Work history, with period of service thereon, with or without the Bank;	
iv. Certification, education and/or training attended by member of the Board of Directors and Board of Commissioners for competence development during the financial year (if any);	
12. In the event of changes in the membership composition of the Board of Directors and/or the Board of Commissioners occuring subsequent to the end of the Financial Year and up to the deadline for submission of the annual report of published financial statements and information on financial performance, membership composition of the Board of Directors and/or Board of Commissioners shall be presented both prior and after such change(s);	137
13. Brief profiles of executive officers, with structure, position and summary curriculum vitae;	138-165
14. Total headcount, and employee distribution in the Financial Year by education and age; and	166-167
15. Awards and/or certifications in domestic as well as international scope, received by the Bank in the last Financial Year (if any), which covers:	
a. Name of award and/or certification;	225-235
b. Issuing institution or agency; and	
c. Validity period of such award and/or certification (if any).	

Description		Page
III.	**Information on Financial Performance**	
	A. Report of the Board of Directors	
	Brief description of the Bank performance, at the very least covering:	
	1. Strategy and policies of the Bank's management	64-65
	2. Comparison between achievement and targets;	67
	3. Constraints faced by the Bank;	67-68
	4. Overview of business prospects;	73-74
	5. Implementation of Bank governance;	74-75
	6. Primary activities;	72
	7. Information Technology;	71
	8. Types of products and services offered by Banks and UUS (for Banks that have UUS), including lending and/or financing to micro, small, and medium enterprise debtors;	72
	9. Interest rates for funding collection during 1 (one) fiscal year;	72-73
	10. The prime lending rate in accordance with the Financial Services Authority Regulation on transparency and publication of prime lending rates for conventional commercial banks for one (1) fiscal year;	72-73
	11. Economic developments and market targets at the end of the year;	73-74
	12. Business networks and partners within and/or overseas, including the number of laku pandai agents owned and the distribution of laku pandai agents at least in aggregate per district or city. The term "laku pandai" is in accordance with the Financial Services Authority Regulation on financial services without offices in the context of inclusive finance;	72-73
	13. Significant changes that occurred in the Bank and the Bank's business group during the relevant year;	73
	14. Important matters anticipated to occur in the future; and	73-74
	15. Human resources, covering quantity, education level, training, and human resource development.	69-70
	B. Report of the Board of Commissioners	
	The report of the Board of Commissioners covers at least:	
	1. Supervision of the policies and management of the Board of Directors;	51-52
	2. Supervision of the implementation of Bank's strategies;	51-52
	3. Opinion on the business prospects as prepared by the Board of Directors;	53
	4. Opinion on the implementation of Bank governance;	53-55
	5. Frequency and mechanism for advising members of the Board of Directors;	56-57
	C. Management Discussion & Analysis	
	Management discussion and analysis presents an analysis and discussion of financial statements accounts and other important information with an emphasis on material changes that occurred during the Financial Year, which at least includes:	
	1. A review of the Bank's performance by business segment, including the Sharia Business Unit (UUS), covering at minimum the Bank's profitability;	249-320
	2. Comprehensive financial performance, which includes a comparison of the current year's financial performance with the previous year's, an explanation of the causes of any changes and the impact of such changes, covering at minimum:	
	a. Investment of funds (investments and disbursement of loan/financing) and total assets;	322-334
	b. Third party funds and other sources of funding;	334-340
	c. Equity;	340-342
	d. Revenues, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss);	342-349
	e. Cash flows; and	349-350
	f. Prime lending rate;	358
	3. Analysis of the quality of earning assets and relevant financial ratios, such as the causes of increases or decreases in the quality of earning assets and mitigation measures taken by the Bank;	351, 383
	4. Capital structure of the Bank;	375-376
	5. Material information and facts subsequent to the date of accountant report (if any); and	380
	6. Marketing aspects of Bank's products, at least on marketing strategy and market share;	395-398
	D. Banks that operate a Sharia Business Unit (UUS) must include UUS-related information in their Published Financial Reports and annual financial performance disclosures, in accordance with the Financial Services Authority regulations concerning transparency and reporting for Islamic commercial banks and sharia business units.	**N.A**
IV.	**Information on Risk Exposure and Capital**	
	Risk Exposure and Capital Reports include the annual Risk Exposure and Capital Publication Report as stipulated in Part IV of the appendix to this Financial Services Authority Circular.	518-647
V.	**Information on Related Parties The disclosure of related party information includes the aggregate total exposure and total transaction value of related parties, categorized by related party type. The scope of related parties and the scope of related party transactions are in accordance with the Financial Services Authority regulations concerning the implementation of corporate governance for commercial banks.**	

Description		Page
VI.	**Information Related to the Bank's Business Group (if applicable) The Bank's business group consists of entities consolidated by the Bank or entities with joint arrangements with the Bank in accordance with financial accounting standards. Banks that are part of a business group and/or have Subsidiaries shall additionally disclose the following:**	
	A. Bank business group structure which includes:	
	1. The structure of the Bank's business group, including the Bank, Subsidiaries, related companies (sister companies), Parent Entity up to the final controlling shareholder;	180, 187, 200-201
	2. The structure of management relationships within the Bank's business group; and	
	3. Shareholders acting on behalf of other shareholders. The definition of a shareholder acting on behalf of another shareholder is an individual shareholder or entity that has a common goal of controlling the Bank, based or not based on an agreement;	
	B. Transactions between the Bank and parties that have special relationships within the Bank's business group, taking into account:	
	1. Information on transactions with related parties, whether carried out by the Bank or by any entity within the Bank's business group operating in the financial sector with the Bank;	414-421
	2. Types of transactions with related parties include:	
	a. Cross-ownership;	
	b. transactions of one business group acting for the benefit of another business group;	
	c. short-term liquidity management within a business group;	
	d. provision of funds provided or received by other entities within a business group;	
	e. exposure to the majority shareholder, including in the form of credit, commitments, and contingencies; and	
	f. purchase, sale, and/or lease of assets with other entities within a business group, including those conducted under repurchase agreements (repos);	
	C. Transactions with related parties conducted by any entity within the Bank's financial group;	**414-421**
	D. Provision of funds, commitments, or other comparable facilities from any entity within the Bank's business group to debtors and/or parties who have received funds from the Bank; and	**422**
	E. The existence of prohibitions, restrictions, and/or other significant obstacles to transferring funds or meeting capital requirements required by the competent authorities between the Bank and other entities within the same business group.	**422**
VII.	**Governance Implementation Report**	
	The scope and guidelines for completion refer to the Financial Services Authority's provisions regarding the implementation of governance for commercial banks.	648-1191
VII.	**Internal Control Report in the Bank's Financial Reporting Process**	
	The internal control report in the Bank's financial reporting process complies with Financial Services Authority regulations regarding the integrity of bank financial reporting.	1004-1006
VIII.	**Financial reports audited by a public accountant registered with the Financial Services Authority, including the independent auditor's report.**	**1248-1583**
IX.	**Other reports in accordance with statutory provisions.**	
	Other reports include reports that can be combined or separated from the Financial Publication Report and annual financial performance information in accordance with statutory provisions, including:	
	A. An annual report on the implementation of integrated governance for a Bank that is a holding company of a financial conglomerate in accordance with the Financial Services Authority Regulation concerning the implementation of integrated governance for financial conglomerates;	**1142**
	B. A public company plan approved at a general meeting of shareholders that has not been implemented within 12 (twelve) months from the date of approval at the general meeting of shareholders for a Bank that is a public company in accordance with the Financial Services Authority Regulation concerning the implementation of capital market activities;	**N.A**
	C. Complaint handling materials in accordance with the Financial Services Authority Regulation concerning consumer and public protection in the financial services sector;	**1108-1110**
	D. A sustainability report in accordance with the Financial Services Authority's provisions concerning the implementation of sustainable finance for financial services institutions, issuers, and public companies; and/or	√
	E. A report on the implementation of social and environmental responsibility in accordance with the provisions of laws and regulations concerning social and environmental responsibility for limited liability companies, including social responsibility implemented by a UUS for Banks with UUS.	**Sustainability Report**
	If the Bank has presented other reports as referred to in letters A) through E) above in a separate report, the Bank is exempt from disclosing such reports in the Annual Financial Published Report and financial performance information. For example, the Bank presents a sustainability report in a separate report, then the Bank does not disclose the report in the Financial Publication Report and annual financial performance information.	√
X.	**Additional Information for Banks that are Issuers or Public Companies**	
	Banks that are issuers or public companies must supplement the scope of information as stipulated in the Financial Services Authority regulations regarding the format and content of annual reports for issuers or public companies.	√

2025
ANNUAL REPORT

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