Go To English Page

| | |
|---|---|
| Nomor Surat | 022/BNC-Tbk/E-Report/IDX/IV/2026 |
| Nama Perusahaan | PT Bank Neo Commerce Tbk. |
| Kode Emiten | BBYB |
| Lampiran | 2 |
| Perihal | Penyampaian Laporan Tahunan & Keberlanjutan dan ESG |

Perseroan Menyampaikan Laporan Tahunan & Keberlanjutan dan ESG tahun 2025 dengan periode tahun buku dari 01 Januari 2025 sampai dengan 31 Desember 2025 dalam bahasa Indonesia dan Inggris

Apakah Perseroan akan/telah melakukan panggilan Rapat Umum Pemegang Saham Tahunan? (Ya)

Perseroan melakukan panggilan Rapat Umum Pemegang Saham Tahunan pada tanggal 08 April 2026

Informasi sebagaimana dimaksud di atas telah dimuat pada Situs Web Perseroan di alamat link https://www.bankneocommerce.co.id pada tanggal 08 April 2026

Apakah Perseroan tercatat di Bursa lain? (Tidak)

**A. Kinerja Lingkungan (Environmental Performance)**

Perseroan menyampaikan Keberlanjutan dan ESG Tahunan :

| **E-01 Laporan Emisi Gas Rumah Kaca (GRK)** | |
|---|---|
| Laporan Emisi GRK Konsolidasi? | Ya |
| Batasan Organisasi | Operasional/Finansial |
| Adakah anak perusahaan yang tidak diikutsertakan dalam laporan ini? | Tidak |

| Name | Total Emisi (tCO2e) |
|---|---|
| **Kategori 1: Emisi GRK langsung dan pembuangan** | |
| Emisi langsung dari pembakaran stasioner | 0 |
| Emisi langsung dari pembakaran bergerak | 57,67 |
| Emisi langsung dari proses pengolahan | 0 |
| Emisi fugitive langsung | 0 |
| Emisi langsung dari Land Use, Land Use Change and Forestry (LULUCF) | 0 |
| **Total Emisi Langsung (Scope 1)** | 57,67 |

| | |
|---|---|
| **Kategori 2: Emisi GRK tidak langsung dari energi yang diimpor/dibeli** | |
| Emisi tidak langsung dari konsumsi Listrik yang diimpor/dibeli | 260,5 |
| Emisi tidak langsung dari konsumsi jaringan energi yang diimpor/dibeli (diluar listrik) | 0 |
| **Total Emisi Tidak Langsung (Scope 2)** | 260,5 |
| **Kategori 3: Emisi GRK tidak langsung dari transportasi** | |
| Transportasi dan distribusi hulu | 0 |
| Perjalanan dinas | 0 |
| Transportasi dari klien dan pengunjung | 0 |
| Transportasi dan distribusi hilir | 0 |
| Perjalanan Karyawan | 0 |
| **Kategori 4: Emisi GRK tidak langsung dari produk yang digunakan oleh perusahaan** | |
| Kegiatan yang berhubungan dengan energi yang tidak termasuk dalam emisi langsung dan emisi energi tidak langsung | 0 |
| Pembelian Barang dan Jasa | 0 |
| Capital equipment/goods | 0 |
| Limbah yang dihasilkan dalam kegiatan operasional | 0 |
| Aset Sewaan hulu | 0 |
| **Kategori 5: Emisi GRK tidak langsung yang terkait dengan penggunaan produk dari perusahaan** | |
| Investasi | 0 |
| Penggunaan produk yang dijual | 0 |
| Perawatan akhir masa pakai produk yang dijual | 0 |
| Waralaba hilir | 0 |
| Aset Sewaan Hilir | 0 |
| Pengolahan produk yang dijual | 0 |

| Kategori 6: Emisi GRK tidak langsung dari sumber lainnya | |
|---|---|
| Emisi atau pembuangan tidak langsung lainnya | 0 |
| **Total Emisi Tidak Langsung (Scope 3)** | 0 |
| **Total Emisi GRK (Scope 1 and 2)** | 318,17 |
| **Total Emisi GRK (Scope 1, 2 and 3)** | 318,17 |
| Offsets/Credits | 0 |
| Pembelian Renewable Energy Certificate (REC) (kWh) | 0 |

| | | | |
|---|---|---|---|
| **E-02** | **Intensitas Emisi GRK** | Total emisi dari Scope 1 dan 2 per unit pendapatan Perusahaan Tercatat | 0,0001 |
| **E-03** | **Konsumsi Energi listrik** | Jumlah total energi yang dikonsumsi secara langsung (kWh or J) | 0 |
| | | Jumlah total energi yang dikonsumsi secara tidak langsung (kWh or J)) | 329.750 |
| | | Total konsumsi energi (kWh or J) | 329.750 |
| **E-04** | **Konsumsi Air** | Total konsumsi air (m3) | 1.667 |
| **E-05** | **Limbah yang dihasilkan** | Total limbah yang dihasilkan (ton) | 755 |

| E-06 Komitmen Perusahaan untuk mencapai target Net Zero Emission | |
|---|---|
| Apakah Perusahaan memiliki komitmen pencapaian target net zero? | Tidak |
| Tahun berapa Perusahaan menargetkan pencapaian Net Zero emission yang dipublikasi? | null |
| Mohon berikan deskripsi ringkas penjelasan dan tautan ke dokumentasi yang menjelaskan komitmen pencapaian target Net zero emission Perusahaan. | |
| Perseroan saat ini belum menetapkan komitmen formal terkait target net zero emission. Namun demikian, Perseroan tetap berkomitmen untuk mengintegrasikan prinsip keberlanjutan dalam operasional dan pengambilan keputusan strategis, termasuk melalui pengelolaan dampak lingkungan secara bertahap serta penguatan kapabilitas internal sebagai fondasi dalam mendukung arah dekarbonisasi di masa mendatang. | |

| E-07 Komitmen Perusahaan untuk mengurangi Emisi Gas Rumah Kaca (Emission Reduction) | |
|---|---|
| Apakah Perusahaan memiliki komitmen mengurangi emisi? | Ya |
| Target pengurangan emisi GRK | 0 % |
| | 0 (tCO2e) |
| Tahun target untuk penurunan emisi GRK? | 2060 |

Apakah perusahaan memiliki manajemen yang mengawasi pengendalian iklim?

Tidak

Langkah-langkah yang sudah dilakukan dan penurunan emisi yang telah dicapai dibandingkan tahun sebelumnya.

Penjelasan:

Perseroan saat ini belum menetapkan komitmen formal terkait target net zero emission. Namun demikian, Perseroan tetap berkomitmen untuk mengintegrasikan prinsip keberlanjutan dalam operasional dan pengambilan keputusan strategis, termasuk melalui pengelolaan dampak lingkungan secara bertahap serta penguatan kapabilitas internal sebagai fondasi dalam mendukung arah dekarbonisasi di masa mendatang.

**B. Kinerja Sosial (Social Performance)**

**S-01 Kesetaraan Gender**

| Level Jabatan | Laki-Laki | | Perempuan | |
|---|---|---|---|---|
| | Jumlah pegawai | Persentasi pegawai | Jumlah pegawai | Persentasi pegawai |
| Entry-level | 359 | 73,57 % | 381 | 85,62 % |
| Mid-level | 113 | 23,16 % | 52 | 11,69 % |
| Senior-level | 13 | 2,66 % | 12 | 2,7 % |
| Executive-level | 3 | 0,61 % | 0 | 0 % |
| Total Pegawai | 488 | 100 % | 445 | 100 % |

**S-02 Jumlah level pegawai yang dimiliki oleh laki-laki dan perempuan berdasarkan kelompok umur**

| Rentang Usia (tahun) | Level Jabatan | | | | | | | | Jumlah Pegawai |
|---|---|---|---|---|---|---|---|---|---|
| | Entry-level | | Mid-level | | Senior-level | | Executive-level | | |
| | Laki-Laki | Perempuan | Laki-Laki | Perempuan | Laki-Laki | Perempuan | Laki-Laki | Perempuan | |
| 18-25 | 29 | 60 | 0 | 0 | 0 | 0 | 0 | 0 | 89 |
| 25-35 | 250 | 273 | 38 | 19 | 2 | 0 | 0 | 0 | 582 |
| 35-45 | 70 | 40 | 58 | 30 | 5 | 8 | 0 | 0 | 211 |
| 45-55 | 10 | 8 | 16 | 3 | 6 | 4 | 2 | 0 | 49 |
| >55 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 2 |

**S-03 Tingkat Pergantian Pegawai**

| | Jumlah Pegawai (dalam tahun pelaporan) | Percentage Pegawai (dalam tahun pelaporan) |
|---|---|---|
| Jumlah Pegawai resign/Pemutusan Hubungan Kerja | 459 Pegawai | 49,2 % |
| Jumlah Pegawai Baru/pengganti | 184 Pegawai | 19,72 % |

**S-04 Jumlah Pegawai Sementara**

| | Jumlah Pegawai (dalam tahun pelaporan) | Percentage Pegawai (dalam tahun pelaporan) |
|---|---|---|
| Jumlah Pegawai perusahaan yang dipegang oleh kontraktor dan/atau konsultan | 145 Pegawai | 15,33 % |

**S-05 Pelatihan dan Pengembangan Pegawai**

| Rata-rata jam pelatihan per pegawai dalam tahun Pelaporan | Jumlah pegawai yang ikut serta dalam program pelatihan | Persentase jumlah pegawai yang ikut serta dalam pelatihan (%) |
|---|---|---|
| 72,79 jam/pegawai | 14.491 | 100 % |

**S-06 Jumlah Kecelakaan Kerja**

| Frekuensi kecelakaan kerja dari total pegawai | Persentase kecelakaan kerja serius yang berakibat cedera serius dan fatal dari total pegawai (%) |
|---|---|
| 0 | 0 % |

**S-07 Jumlah Kejadian Pelanggaran Hak Asasi Manusia**

| | |
|---|---|
| **Jumlah pelanggaran hak asasi manusia dalam tahun Pelaporan** | 0 |

| **Kebijakan Perusahaan terkait Pekerja** | |
|---|---|
| **S-08 Perusahaan memiliki kebijakan terkait pelecehan seksual dan/atau non-diskriminasi?** | Ya |
| Perusahaan memiliki kebijakan terkait pelecehan seksual dan non-diskriminasi yang tertuang dalam Peraturan Perusahaan serta kebijakan internal (SKEP/031/SET/BNC/III/2023). Kebijakan ini menjadi dasar dalam menciptakan lingkungan kerja yang adil, inklusif, dan bebas dari diskriminasi, serta memastikan hubungan kerja yang profesional dan saling menghormati. | |
| **S-09 Perusahaan memiliki kebijakan mengenai hak asasi manusia?** | Ya |
| Perusahaan memastikan bahwa seluruh kegiatan operasionalnya berjalan tanpa pelanggaran hak asasi manusia, yang tercermin dari tidak adanya kasus pelanggaran selama periode pelaporan. Namun demikian, laporan menyebutkan bahwa Perusahaan belum memiliki kebijakan khusus yang secara eksplisit mengatur hak asasi manusia dalam dokumen terpisah, sehingga pengaturan HAM masih terintegrasi dalam kebijakan internal dan praktik operasional yang ada. | |
| **S-10 Perusahaan memiliki kebijakan mengenai pekerja anak dan/atau pekerja paksa?** | Ya |
| Perusahaan memiliki komitmen untuk tidak mempekerjakan tenaga kerja anak dan menolak praktik kerja paksa. Kebijakan ini diatur dalam Peraturan Perusahaan dan dilaksanakan sesuai dengan ketentuan peraturan perundang-undangan di Indonesia, termasuk UU No. 13 Tahun 2003 tentang Ketenagakerjaan dan UU No. 6 Tahun 2023 tentang Cipta Kerja, sebagai bagian dari praktik ketenagakerjaan yang bertanggung jawab. | |
| **S-11 Perusahaan memiliki kebijakan perusahaan mengenai kesehatan dan keselamatan kerja serta lingkungan kerja yang aman dan layak diberikan kepada seluruh karyawan?** | Ya |
| Perusahaan telah menerapkan praktik kerja yang aman dan terkendali, yang tercermin dari tidak adanya kecelakaan kerja maupun insiden fatal selama periode pelaporan. Namun demikian, laporan juga menyatakan bahwa Perusahaan belum memiliki kebijakan formal terkait kesehatan dan keselamatan kerja (K3) dalam bentuk dokumen tersendiri, sehingga aspek ini masih menjadi area penguatan tata kelola ke depan. | |

**Corporate Social Responsibility (CSR)**

| S-12 Perusahaan memiliki aktivitas CSR, investasi atau sumbangan terhadap komunitas atau organisasi nirlaba terdaftar? | Ya |
|---|---|

Perusahaan secara aktif melaksanakan program Tanggung Jawab Sosial dan Lingkungan (TJSL), termasuk kegiatan sosial, literasi keuangan, serta keterlibatan masyarakat secara berkelanjutan. Program ini dijalankan sebagai bagian dari strategi keberlanjutan yang terintegrasi dalam RAKB dan selaras dengan Tujuan Pembangunan Berkelanjutan (SDGs), sehingga mencerminkan kontribusi Perusahaan terhadap pembangunan sosial dan lingkungan.

**C. Kinerja Tata Kelola (Governance Performance)**

**G-01 Keberagaman Manajemen dan Independensi (Board Diversity and Independence)**

| Tipe Manajemen Perusahaan | Jumlah | Laki-laki | Perempuan | Pihak Independen |
|---|---|---|---|---|
| Komisaris | 0 | 3 | 0 | 2 |
| Direksi | 0 | 3 | 0 | 3 |

**G-02 Total kehadiran direksi dan komisaris ke rapat dewan**

| | Jumlah rapat dewan (di tahun pelaporan) | Rata-rata persentase kehadiran direksi/komisaris dalam rapat dewan |
|---|---|---|
| Jumlah kehadiran direksi ke rapat dewan | 7 | 90,47 % |
| Jumlah kehadiran komisaris ke rapat dewan | 7 | 100 % |

Kebijakan mengenai manajemen lainnya

| G-03 Perusahaan memiliki kebijakan mengenai pemisahan Chairman of The Board dan CEO? | Tidak |
|---|---|

Perseroan menerapkan prinsip tata kelola yang baik dengan memastikan adanya pemisahan fungsi kepemimpinan antara Dewan Komisaris (termasuk Chairman of the Board) dan Direksi (CEO), guna menjaga independensi, efektivitas pengawasan, serta keseimbangan dalam pengambilan keputusan strategis. Struktur ini mendukung terciptanya mekanisme check and balance yang optimal dalam pengelolaan Perseroan.

| G-04 Perusahaan memiliki kebijakan penilaian dewan direksi dan komisaris | Ya |
|---|---|

Perusahaan memiliki kebijakan terkait penilaian direksi dan komisaris.
Penilaian kinerja Dewan Komisaris dilaksanakan sesuai dengan ketentuan dan mekanisme yang diatur dalam kebijakan Perseroan. Secara berkala, Dewan Komisaris menyusun laporan pengawasan tahunan yang disampaikan kepada Pemegang Saham dalam RUPS. Berdasarkan hasil penilaian kinerja tahun 2025, Dewan Komisaris dinilai berada pada kategori baik. Seluruh anggota Dewan Komisaris dinilai memiliki kompetensi dan profesionalisme yang memadai, didukung oleh latar belakang pendidikan, pengalaman, serta keahlian yang beragam, sehingga mampu mendukung efektivitas fungsi pengawasan terhadap operasional Perseroan.

Perseroan memiliki kebijakan penilaian kinerja Direksi yang mengacu pada ketentuan yang berlaku, khususnya POJK No. 5/POJK.03/2016 tanggal 26 Januari 2016 tentang Rencana Bisnis Bank Umum serta regulasi terkait lainnya. Penilaian kinerja Direksi dilakukan melalui penyusunan Laporan Pengawasan Rencana Bisnis yang disampaikan secara semesteran kepada bidang pengawasan Otoritas Jasa Keuangan.

| | |
|---|---|
| **G-05 Perusahaan memiliki kebijakan pelatihan dewan direksi dan komisaris** | Tidak |
| Perseroan memiliki komitmen untuk meningkatkan kompetensi dan profesionalisme Dewan Direksi dan Dewan Komisaris melalui penyelenggaraan program pelatihan dan pengembangan yang berkelanjutan. Kebijakan ini dirancang untuk memastikan bahwa setiap anggota dewan senantiasa memiliki pengetahuan dan pemahaman yang memadai terkait dinamika industri, regulasi, serta praktik tata kelola terkini, sehingga dapat menjalankan fungsi pengawasan dan pengambilan keputusan secara efektif dan berintegritas. | |
| **G-06 Kriteria khusus yang digunakan untuk pemilihan dewan direksi dan komisaris** | Tidak |
| Perusahaan memiliki kebijakan pemilihan direksi dan dewan komisaris.<br><br>Proses nominasi , pengangkatan, serta pemberhentian anggota Dewan Komisaris dan Direksi Perseroan dilaksanakan oleh Pemegang Saham melalui mekanisme Rapat Umum Pemegang Saham (RUPS). Dalam mendukung proses tersebut, Komite Nominasi dan Remunerasi menjalankan fungsi evaluasi dan penilaian terhadap calon anggota Dewan Komisaris dan Direksi, yang hasilnya disampaikan sebagai rekomendasi kepada Dewan Komisaris. Selanjutnya, Dewan Komisaris akan mengajukan rekomendasi tersebut untuk memperoleh persetujuan RUPS | |
| **G-07 Perusahaan memiliki kebijakan mengenai kode etik dan/atau anti-korupsi?** | Ya |
| Perusahaan memiliki kebijakan kode etik (Code of Conduct) yang mengatur standar perilaku seluruh insan perusahaan, termasuk Direksi, Komisaris, dan karyawan. Selain itu, Perusahaan menerapkan kebijakan anti-korupsi dan anti-penyuapan dengan prinsip zero tolerance, yang dituangkan dalam Prosedur Anti Suap dan Anti Korupsi yang disahkan melalui SK Direksi No. SK/035-2/SET/BNC/VI/2021. Kebijakan ini juga diperkuat dengan kewajiban pelaporan gratifikasi serta penandatanganan pakta integritas oleh seluruh insan perusahaan. | |
| **G-08 Perusahaan memiliki kebijakan mengenai perlakuan adil terhadap Pemegang Saham?** | Tidak |
| Perseroan menerapkan salah satu prinsip dalam GCG yaitu Prinsip 7 menjelaskan mengenai pemenuhan hak pemegang saham dan perlakuan adil bagi pemegang saham, bagaimana cara kerja sama aktif antara Perseroan dengan pemegang sahamnya dilaksanakan serta pelaksanaan sebagian hak pemegang saham secara efektif melalui RUPS | |
| **G-09 Perusahaan memiliki kebijakan mengenai kewajiban direksi/komisaris untuk mencegah adanya konflik kepentingan?** | Ya |
| Perusahaan memiliki kebijakan yang mengatur bahwa seluruh karyawan wajib menghindari konflik kepentingan, baik yang berasal dari kepentingan pribadi maupun pihak lain yang dapat bertentangan dengan kepentingan perusahaan. Ketentuan ini merupakan bagian dari kode etik (Code of Conduct) yang menjadi pedoman perilaku seluruh insan perusahaan dalam menjalankan tugas secara profesional dan berintegritas. | |

**D. Lain-lain**

Keselarasan Laporan Keberlanjutan/Tahunan dengan Metrik ESG

| Kinerja | Kode | Nama Metrik | Halaman di Laporan Keberlanjutan/Tahunan |
|---|---|---|---|
| Lingkungan | E-01 | Laporan Emisi Gas Rumah Kaca | 510 |
| | E-02 | Intensitas Emisi Gas Rumah Kaca | 510 |
| | E-03 | Konsumsi Energi Listrik | 509 |
| | E-04 | Konsumsi Air | 508 |
| | E-05 | Limbah yang Dihasilkan | 504-505 |
| | E-06 | Komitmen Perusahaan untuk Mencapai Target Net Zero Emission | - |
| | E-07 | Komitmen Perusahaan untuk mengurangi Emisi Gas Rumah Kaca | 508-509 |
| Sosial | S-01 | Kesetaraan Gender | 110 |
| | S-02 | Pegawai Berdasarkan Gender dan Kelompok Umur | 110 |
| | S-03 | Tingkat Pergantian Pegawai | 113 |
| | S-04 | Jumlah Pegawai Sementara | 110 |
| | S-05 | Pelatihan dan Pengembangan Pegawai | 113-131 |
| | S-06 | Jumlah Kecelakaan Kerja | 516 |
| | S-07 | Kejadian Pelanggaran Hak Asasi Manusia | 115-513 |
| | S-08 | Kebijakan Pelecehan Seksual dan/atau Non-diskriminasi | 115 |
| | S-09 | Kebijakan Mengenai Hak Asasi Manusia | 115 |
| | S-10 | Kebijakan Pekerja Anak dan/atau Pekerja Paksa | 115-513 |
| | S-11 | Kebijakan Mengenai Kesehatan dan Keselamatan Kerja serta Lingkungan Kerja yang Aman dan Layak diberikan Kepada Seluruh Karyawan | 115-516 |
| | S-12 | Pencegahan Konflik Kepentingan | 520-524 |

| | | | |
|---|---|---|---|
| Tata-kelola | G-01 | Keberagaman Manajemen dan Independensi | 390 |
| | G-02 | Total Kehadiran Direksi dan Komisaris ke Rapat Dewan | 377 |
| | G-03 | Kebijakan Pemisahan Chairman of the Board dan CEO | 330-382 |
| | G-04 | Kebijakan Penilaian Dewan Direksi dan Komisaris | 456 |
| | G-05 | Kebijakan Pelatihan Dewan Direksi dan Komisaris | 115-119 |
| | G-06 | Kriteria Khusus Pemilihan Dewan | 391-392 |
| | G-07 | Kode Etik dan/atau Anti-Korupsi | 457-459 |
| | G-08 | Kebijakan Perlakuan Adil terhadap Pemegang Saham | 331 |
| | G-09 | Pencegahan Konflik Kepentingan | 182-186 |

Standar Internasional yang Diacu dan Verifikasi Pihak Ketiga

Keselarasan dengan kerangka pelaporan keberlanjutan

[X] Ya [ ] Tidak

- [ ] GRI
- [ ] TCFD
- [ ] CDP
- [ ] IFRS S1
- [ ] IFRS S2
- [ ] SASB
- [X] Others, please specify

Laporan keberlanjutan Perusahaan disusun sesuai dengan ketentuan POJK No. 51/POJK.03/2017 dan SEOJK No. 16/SEOJK.04/2021, serta mengacu pada prinsip keuangan berkelanjutan dan selaras dengan Tujuan Pembangunan Berkelanjutan (SDGs). Penyusunan ini mencerminkan komitmen Perusahaan dalam menerapkan praktik pelaporan keberlanjutan yang terstandarisasi dan transparan.

Assurance dan validasi pihak ketiga

[X] Tidak

Demikian untuk diketahui.

Hormat Kami,

**PT Bank Neo Commerce Tbk.**

Heru Sulistiadhi

Head of Corporate Secretary

PT Bank Neo Commerce Tbk.

Treasury Tower Lantai 60 Kawasan District 8, Lot 28, SCBD, Jalan Jenderal

Telepon : 021-27094950  021-27094951, Fax : -, http://www.bankneocommerce.co.

| | |
|---|---|
| Nama Pengirim | Heru Sulistiadhi |
| Jabatan | Head of Corporate Secretary |
| Tanggal dan Waktu | 08-04-2026 21:21 |
| Lampiran | 1. Pengantar.pdf |
| | 2. AR SR 2025 compressed.pdf |

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| | |
|---|---|
| Letter / Announcement No. | 022/BNC-Tbk/E-Report/IDX/IV/2026 |
| Issuer Name | PT Bank Neo Commerce Tbk. |
| Issuer Code | BBYB |
| Attachment | 2 |
| Subject | Submission of Annual And Sustainability Report |

The Company hereby submit Annual And Sustainability Report Report 2025 for the period of 01 Januari 2025 to 31 Desember 2025 in Indonesia dan Inggris

Will the Company be/has summons for the Annual General Meeting of Shareholders? (Yes)

The Company made invitations to the Annual General Meeting of Shareholders on 08 April 2026

The information referred above has been published on the Company's website https://www.bankneocommerce.co.id at 08 April 2026

Is the Company listed on another Stock Exchange? (No)

**A. Environmental Performance**

The Company submits its Annual Sustainability and ESG Report:

| **E-01 Greenhouse Gas (GHG) Emission Report** | |
|---|---|
| Consolidated GHG Emission Report? | Yes |
| Organizational Boundaries | Operasional/Finansial |
| Any subsidiaries that are not included in the report? | No |

| Name | Total emission (tCO2e) |
|---|---|
| **Category 1: Direct GHG emissions and removals** | |
| Direct emissions from stationary combustion | 0 |
| Direct emissions from mobile combustion | 57,67 |
| Direct emissions from processes | 0 |
| Direct fugitive emissions | 0 |
| Direct emissions from Land Use, Land Use Change and Forestry (LULUCF) | 0 |
| Total Direct Emissions (Scope 1) | 57,67 |
| **Category 2: Indirect GHG emissions from imported energy** | |

| | |
|---|---|
| Indirect emissions from imported/purchased electricity consumption | 260,5 |
| Indirect emissions from imported/purchased network energy consumption (excluding electricity) | 0 |
| Total Indirect Emissions (Scope 2) | 260,5 |
| **Category 3: Indirect GHG emissions from transportation** | |
| Upstream transport and distribution | 0 |
| Business travels | 0 |
| Transportation of clients and visitors | 0 |
| Downstream transportation and distribution | 0 |
| Employee commuting | 0 |
| **Category 4: Indirect GHG emissions from products used by Organization** | |
| Energy related activities not included in direct emissions and energy indirect emissions | 0 |
| Purchased goods and services | 0 |
| Capital equipment/goods | 0 |
| Waste generated in operations | 0 |
| Upstream leased assets | 0 |
| **Category 5: Indirect GHG Emissions associated with the use of products from the Organization** | |
| Investments | 0 |
| Use of sold products | 0 |
| End of life treatment of sold products | 0 |
| Downstream franchises | 0 |
| Downstream leased assets | 0 |
| Processing of sold products | 0 |
| **Category 6: Indirect GHG emissions from other sources** | |

| | |
|---|---|
| Other indirect emissions or removals | 0 |
| Total GHG Emissions (Scope 1 and 2) | 0 |
| Total GHG Emissions (Scope 1 and 2) | 318,17 |
| Total GHG Emissions (Scope 1, 2 and 3) | 318,17 |
| Offsets/Credits | 0 |
| REC Purchases (kWh) | 0 |

| | | | |
|---|---|---|---|
| **E-02** | **GHG Emissions Intensity** | Total scope 1 and 2 emissions produced per revenue of listed compant (tCO2e/Rp) | 0,0001 |
| **E-03** | **Electricity Consumption** | Total amount of energy directly consumed (kWh or J) | 0 |
| | | Total amount of energy indirectly consumed (kWh or J) | 329.750 |
| | | Total energy consumption (kWh or J) | 329.750 |
| **E-04** | **Water Consumption** | Total water consumed (m3) | 1.667 |
| **E-05** | **Waste Generation** | Total waste generated (ton) | 755 |

| **E-06 Company commitment to Net Zero Emission Target** | |
|---|---|
| Does the Company have a net zero emission target commitment? | No |
| What year is the Company's net zero emission published target? | null |
| Please provide a brief description and a link to documentation explaining the Company's commitment in achieving net zero emission target. | |
| The Company has not yet made a formal commitment regarding net-zero emissions targets. However, the Company remains committed to integrating sustainability principles into its operations and strategic decision-making, including through the gradual management of environmental impacts and the strengthening of internal capabilities as a foundation for supporting future decarbonization efforts. | |

| **E-07 Company Commitment to GHG Emission Reduction Target** | |
|---|---|
| Does the Company commit to reducing GHG emission? | Ya |
| What is the Company's GHG emission reduction target? | 0 % |
| | 0 (tCO2e) |
| Targeted year in achieving GHG reduction target? | 2060 |

Does the Listed Company has measures on monitoring in enacting climate policy?

No

Steps that have been taken and emission reductions that have been achieved compared to the previous year

The Company is committed to reducing its environmental impact, including emissions, as reflected in its digital banking operations, which minimize the need for customers' physical mobility, as well as through the implementation of green office practices and energy efficiency initiatives. This commitment forms an integral part of the Company's sustainability strategy as outlined in its Sustainable Finance Action Plan (RAKB), and is aligned with sustainable finance principles in accordance with POJK No. 51/POJK.03/2017, although it has not yet been translated into quantified emission reduction targets.
The Company has established a sustainability management mechanism through the formation of a dedicated task force responsible for coordinating and monitoring the achievement of sustainability targets, including environmental aspects. In addition, ESG considerations have been integrated into business decision-making processes, reflecting the presence of oversight functions in managing climate-related aspects within the sustainability governance framework, in line with POJK No. 51/POJK.03/2017.
The Company has implemented various energy efficiency measures, including the use of LED lighting, optimization of natural lighting, regulation of air conditioning usage, and reduction of electricity consumption outside operational hours. Furthermore, efforts have been made to reduce paper and plastic usage in daily operations as part of the green office culture. These initiatives represent the implementation of internal energy efficiency policies and the integration of sustainability principles within the RAKB.
In terms of performance, electricity consumption in 2025 was recorded at 329,750 kWh, reflecting a decrease of 7,408 kWh compared to 337,158 kWh in 2024. This reduction indicates improved energy efficiency, which contributes to emission reduction, although it has not been directly reported as a quantified reduction in greenhouse gas (GHG) emissions.

**B. Kinerja Sosial (Social Performance)**

**S-01 Gender Diversity**

| Job positions | Men | | Women | |
|---|---|---|---|---|
| | Number of employees | Percentage of employees | Number of employees | Percentage of employees |
| Entry-level | 359 | 73,57 % | 381 | 85,62 % |
| Mid-level | 113 | 23,16 % | 52 | 11,69 % |
| Senior-level | 13 | 2,66 % | 12 | 2,7 % |
| Executive-level | 3 | 0,61 % | 0 | 0 % |
| Total Pegawai | 488 | 100 % | 445 | 100 % |

**S-02 Employees Level by Gender and Age Group**

| Age group (years) | Job levels | | | | | | | | Number of employees |
|---|---|---|---|---|---|---|---|---|---|
| | Entry-level | | Mid-level | | Senior-level | | Executive-level | | |
| | Men | Women | Men | Women | Men | Women | Men | Women | |
| 18-25 | 29 | 60 | 0 | 0 | 0 | 0 | 0 | 0 | 89 |
| 25-35 | 250 | 273 | 38 | 19 | 2 | 0 | 0 | 0 | 582 |
| 35-45 | 70 | 40 | 58 | 3 | 5 | 8 | 0 | 0 | 211 |
| 45-55 | 10 | 8 | 16 | 3 | 6 | 4 | 2 | 0 | 49 |
| >55 | 0 | 0 | 1 | 0 | 0 | 0 | 1 | 0 | 2 |

**S-03 Employees Turnover**

| | Number of employees (in reporting year) | Percentage (in reporting year) |
|---|---|---|
| Number of employees resigned | 459 Employees | 49,2 % |
| Number of newly appointed Employees | 184 Employees | 19,72 % |

**S-04 Temporary Worker**

| | Number of employees (in reporting year) | Percentage (in reporting year) |
|---|---|---|
| Total company headcount held by contractors and/or consultants | 145 Employees | 15,33 % |

**S-05 Employee Training and Development**

| Average training hour per employee (in reporting year) | Total employee attending company training program | Percentage of employee attending company training program (%) |
|---|---|---|
| 72,79 hours/employee | 14.491 | 100 % |

**S-06 Injury Rate**

| Frequency of work-related accidents of total Employees (in reporting year) | Percentage of serious work-related accidents resulting in serious and fatal injuries from total employees (%) |
|---|---|
| 0 | 0 % |

**S-07 Incidents Regarding Human Rights Abuse**

| | |
|---|---|
| **Number of incidents regarding human rights abuse (in reporting year)** | 0 |

| **Company Policy Regarding Employees** |
|---|

| | |
|---|---|
| **S-08 Does the company has a policy regarding sexual harassment and/or non-discrimination?** | Yes |

| | |
|---|---|
| **S-09 Does the company has a policy regarding human rights?** | Yes |

| | |
|---|---|
| **S-10 Does the company have a policy regarding child labor and/or forced labor?** | Yes |

| | |
|---|---|
| **S-11 Does the company have a company policy regarding occupational health and safety as well as a safe working environment for all employees?** | Yes |

**Corporate Social Responsibility (CSR)**

| | |
|---|---|
| **S-12 Does the company have CSR activities, investments or donations to the community or registered non-profit organizations?** | Yes |

**C. Governance Performance**

**G-01 Board Diversity and Independence**

| Type of Company Board | Number of seats on Company | Seats Occupied by Men | Seats Occupied by Women | Seats Occupied by Independent Party |
|---|---|---|---|---|
| Commissioners | 0 | 3 | 0 | 2 |
| Directors | 0 | 3 | 0 | 3 |

**G-02 Board Meeting Attendance**

| | Number of board meetings (in reporting year) | Percentage of board meeting attendances (in reporting year) |
|---|---|---|
| Director Attendance to Board Meetings | 7 | 90,47 % |
| Comissioner Attendance to Board Meetings | 7 | 100 % |

Other governmental-related policy

| | |
|---|---|
| **G-03 Does the company has a policy regarding separation of the Chairman of the Board and CEO?** | No |
| The Company implements good corporate governance principles by ensuring a clear separation of leadership functions between the Board of Commissioners (including the Chairman of the Board) and the Board of Directors (CEO). This structure is intended to maintain independence, enhance the effectiveness of oversight, and ensure balanced strategic decision-making. It supports the establishment of an optimal system of checks and balances in the management of the Company. | |
| **G-04 Does the company has a policy regarding board appraisal?** | Yes |
| The Company has established policies regarding the performance evaluation of the Board of Directors and the Board of Commissioners.<br><br>The performance assessment of the Board of Commissioners is conducted in accordance with the provisions and mechanisms stipulated in the Company's policies. On a periodic basis, the Board of Commissioners prepares an annual supervisory report, which is submitted to the Shareholders through the General Meeting of Shareholders (GMS). Based on the 2025 performance evaluation results, the Board of Commissioners was assessed to be in the "good" category. All members of the Board of Commissioners are considered to possess adequate competence and professionalism, supported by diverse educational backgrounds, experience, and expertise, enabling them to effectively carry out their supervisory functions | |

over the Companys operations.

The Company also has a policy for evaluating the performance of the Board of Directors, which refers to applicable regulations, particularly POJK No. 5/POJK.03/2016 dated January 26, 2016 concerning Commercial Bank Business Plans, as well as other relevant regulations. The performance evaluation of the Board of Directors is carried out through the preparation of the Business Plan Supervision Report, which is submitted semi-annually to the supervisory authority of the Financial Services Authority (OJK).

| | |
|---|---|
| **G-05 Does the company has a policy regarding board training and development?** | No |

The Company is committed to enhancing the competence and professionalism of the Board of Directors and the Board of Commissioners through the implementation of continuous training and development programs. This policy is designed to ensure that each board member maintains adequate knowledge and understanding of industry dynamics, regulatory developments, and current governance practices, thereby enabling them to perform their oversight and decision-making functions effectively and with integrity.

| | |
|---|---|
| **G-06 Does the company has a criteria regarding board appointment and re-election?** | No |

The Company has established policies governing the selection of members of the Board of Directors and the Board of Commissioners.

The nomination, appointment, and dismissal of members of the Board of Commissioners and the Board of Directors are carried out by the Shareholders through the mechanism of the General Meeting of Shareholders (GMS). To support this process, the Nomination and Remuneration Committee performs evaluation and assessment of candidates for the Board of Commissioners and the Board of Directors, the results of which are submitted as recommendations to the Board of Commissioners. Subsequently, the Board of Commissioners will propose these recommendations for approval at the GMS.

| | |
|---|---|
| **G-07 Does the company has a policy regarding ethics and/or anti-corruption?** | Yes |

The Company has established a Code of Conduct policy that sets out the standards of behavior for all employees, including members of the Board of Directors, the Board of Commissioners, and staff. In addition, the Company implements anti-corruption and anti-bribery policies based on a zero-tolerance principle, as stipulated in the Anti-Bribery and Anti-Corruption Procedures approved through Board of Directors Decree No. SK/035-2/SET/BNC/VI/2021. This policy is further reinforced by mandatory gratuity reporting and the signing of integrity pacts by all personnel across the Company.

| | |
|---|---|
| **G-08 Does the company has a policy regarding equitable treatment of shareholders?** | No |

The Company implements one of the key principles of Good Corporate Governance (GCG), namely Principle 7, which emphasizes the fulfillment of shareholders rights and the fair treatment of shareholders. This principle outlines how active engagement between the Company and its shareholders is carried out, as well as the effective exercise of certain shareholders rights through the General Meeting of Shareholders (GMS)

| | |
|---|---|
| **G-09 Does the company have a policy regarding the obligations of directors/commissioners to prevent conflicts of interest?** | Yes |

The Company has established a policy requiring all employees to avoid conflicts of interest, whether arising from personal interests or from other parties that may conflict with the interests of the Company. This provision forms part of the Code of Conduct, which serves as a guideline for all personnel to carry out their duties professionally and with integrity.

**D. Other**

Alignment of Sustainability/Annual Reports with ESG Metrics

| Kinerja | Kode | Metric Name | Pages in the Sustainability/Annual Report |
|---|---|---|---|
| Environment | E-01 | Greenhouse Gas Emission Report | 510 |
| | E-02 | Greenhouse Gas Emission Intensity | 510 |
| | E-03 | Electricity Consumption | 509 |
| | E-04 | Water Consumption | 508 |
| | E-05 | Waste Generated | 504-505 |
| | E-06 | Company Commitment to Achieving Net Zero Emission Target | - |
| | E-07 | Company Commitment to Reduce Emission | 508-509 |
| Social | S-01 | Gender Equality | 110 |
| | S-02 | Employees by Gender and Age Group | 110 |
| | S-03 | Employee Turnover Rate | 113 |
| | S-04 | Number of Temporary Officers | 110 |
| | S-05 | Employee Training and Development | 113-131 |
| | S-06 | Number of Work Accidents | 516 |
| | S-07 | Human Rights Violation Incidents | 115-513 |
| | S-08 | Sexual Harassment and/or Non-Discrimination Policy | 115 |
| | S-09 | Policy on Human Rights | 115 |
| | S-10 | Child Labor and/or Forced Labor Policy | 115-513 |
| | S-11 | Occupational Health and Safety Policy and Safe and Secure Work Environment are provided to all employees. | 115-516 |
| | S-12 | Corporate Social Responsibility | 520-524 |

| | | | |
|---|---|---|---|
| Governance | G-01 | Management Diversity and Independence | 390 |
| | G-02 | Total Attendance of Directors and Commissioners to Board Meetings | 377 |
| | G-03 | Chairman of the Board and CEO Separation Policy | 330-382 |
| | G-04 | Board of Directors and Commissioners Assessment Policy | 456 |
| | G-05 | Board of Directors and Commissioners Training Policy | 115-119 |
| | G-06 | Special Criteria for Election of the Board | 391-392 |
| | G-07 | Code of Ethics and/or Anti-Corruption | 457-459 |
| | G-08 | Fair Treatment Policy for Shareholders | 331 |
| | G-09 | Conflict of Interest Prevention Policy | 182-186 |

Referenced International Standards and Third Party Verification

Alignment with sustainability reporting framework

[X] Yes [ ] No

- [ ] GRI
- [ ] TCFD
- [ ] CDP
- [ ] IFRS S1
- [ ] IFRS S2
- [ ] SASB
- [X] Others, please specify

Laporan keberlanjutan Perusahaan disusun sesuai dengan ketentuan POJK No. 51/POJK.03/2017 dan SEOJK No. 16/SEOJK.04/2021, serta mengacu pada prinsip keuangan berkelanjutan dan selaras dengan Tujuan Pembangunan Berkelanjutan (SDGs). Penyusunan ini mencerminkan komitmen Perusahaan dalam menerapkan praktik pelaporan keberlanjutan yang terstandarisasi dan transparan.

Third-party assurance and/or validation

[X] No

Thus to be informed accordingly.

Respectfully,

**PT Bank Neo Commerce Tbk.**

Heru Sulistiadhi

Head of Corporate Secretary

PT Bank Neo Commerce Tbk.

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| | |
|---|---|
| Sender Name | Heru Sulistiadhi |
| Function | Head of Corporate Secretary |
| Date and Time | 08-04-2026 21:21 |
| Attachment | 1. Pengantar.pdf |
| | 2. AR SR 2025 compressed.pdf |

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