2025

Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report

bank victoria



Sustainable Growth through Digitalization and Strong Governance

PT Bank Victoria International Tbk

PT Bank Victoria International Tbk berizin dan diawasi oleh Otoritas Jasa Keuangan dan Bank Indonesia serta merupakan peserta penjaminan Lembaga Penjamin Simpanan.

Sanggahan dan Batasan Tanggung Jawab

Disclaimer and Scope of Responsibilities

Laporan Tahunan 2025 PT Bank Victoria International Tbk (yang selanjutnya disebut Bank Victoria atau Bank) ini disusun untuk memenuhi ketentuan pelaporan hasil kinerja Bank pada periode 1 Januari 2025 sampai dengan 31 Desember 2025 kepada regulator dan pemangku kepentingan. Laporan Tahunan ini antara lain disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik dengan muatan konten sesuai Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.

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

The 2025 Annual Report of PT Bank Victoria International Tbk (hereinafter referred to as Bank Victoria or Bank) was prepared to meet the requirements of reporting the Bank's performance results for the period of 1 January 2025 to 31 December 2025 to the regulator and stakeholders. This Annual Report was compiled based on Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Reports of Issuers or Public Companies with contents in accordance with Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies.

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

Kesinambungan Tema
Theme Continuity

2025
Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report



Sustainable Growth through Digitalization and Strong Governance

Bank Victoria meyakini bahwa pertumbuhan yang sehat perlu dibangun melalui perubahan yang relevan dengan perkembangan industri, sekaligus dijaga dengan fondasi pengelolaan yang kuat. Sepanjang tahun 2025, Bank tidak hanya berfokus pada pertumbuhan bisnis, tetapi juga pada cara pertumbuhan itu dicapai, yakni melalui penguatan digitalisasi, inovasi layanan, dan peningkatan efisiensi agar tetap adaptif terhadap kebutuhan nasabah dan dinamika perbankan yang semakin kompetitif. Dalam konteks ini, digitalisasi bukan diposisikan sekadar sebagai modernisasi teknologi, melainkan sebagai sarana untuk memperkuat kualitas layanan, memperluas akses, dan mendorong kinerja usaha yang lebih tangguh dan berkelanjutan.

Lebih dari itu, pertumbuhan yang ingin diwujudkan Bank bukanlah pertumbuhan yang berdiri sendiri, melainkan pertumbuhan yang dijalankan dengan disiplin tata kelola, kehati-hatian, dan tanggung jawab yang semakin kuat. Hal ini tercermin dari komitmen Bank dalam menjaga keseimbangan antara kinerja ekonomi, sosial, dan lingkungan, sebagaimana dituangkan dalam strategi keberlanjutan dan Rencana Aksi Keuangan Berkelanjutan, termasuk penguatan struktur organisasi, integrasi aspek sosial dan lingkungan dalam manajemen risiko, serta pengembangan kapasitas internal untuk mendukung keuangan berkelanjutan.

Bank Victoria believes that a healthy growth needs to be built through changes relevant to industry developments, underpinned by a strong management foundation. Throughout 2025, the Bank focused not only on business growth but also on ways to achieve that growth, namely through strengthening digitalization, innovating services, and improving efficiency to remain adaptive to customer needs and the increasingly competitive dynamics of banking. In this context, digitalization is not merely positioned as technology modernization, but rather as a means to strengthen service quality, expand access, and encourage more resilient and sustainable business performance.

Furthermore, the growth the Bank seeks to achieve is not a stand-alone growth, but instead growth carried out with the increasingly strong governance discipline, prudence, and responsibility. This is reflected in the Bank's commitment to maintaining the balance of economic, social, and environmental performances, as outlined in the sustainability strategy and Sustainable Finance Action Plan, including the strengthening of organizational structure, integration of social and environmental aspects into risk management, and development in internal capacity to support sustainable finance.

CONTINUOUS TRANSFORMATION WITH STRONG GOVERNANCE AND EXCELLENCE SERVICES FOR SUSTAINABLE GROWTH



2024

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

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

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

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

MOVING FORWARD TO ACCELERATED GROWTH AND STRONGER GOVERNANCE



2023

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

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

Keunggulan Kompetitif
Competitive Advantages



Memiliki Jaringan Kantor Operasional yang Berfokus pada Penetrasi Pasar

Having Operational Office Network that Focuses on Market Penetration

Memiliki Tingkat Kecukupan Modal yang Kuat

Having Strong Capital Adequacy

Memiliki Potensi Sinergi dan Saling Menguntungkan dengan Seluruh Grup Usaha

Potential Synergy and Mutual Benefits with All Business Groups

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

Implementing the Good Personal Customer Relationship Approach (Relationship Banking)

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

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



Inovasi Produk dan Layanan

Product and Service Innovations



Komitmen dan Strategi Keberlanjutan [POJK A.1]

Sustainability Commitment and Strategy

Bank Victoria meyakini bahwa pertumbuhan bisnis yang sehat tidak dapat dipisahkan dari prinsip keberlanjutan. Di tengah persaingan industri perbankan yang semakin dinamis, keberhasilan jangka panjang hanya dapat dicapai apabila Bank mampu menjaga keseimbangan antara kinerja ekonomi, sosial, dan lingkungan. Oleh karena itu, setiap langkah strategis yang diambil senantiasa diarahkan untuk tidak hanya menciptakan nilai finansial, tetapi juga memberikan kontribusi positif bagi masyarakat dan menjaga kelestarian lingkungan. Pendekatan ini menjadi dasar bagi Bank dalam membangun fondasi usaha yang tangguh dan berkelanjutan.

Bank Victoria believes that a healthy business growth is inseparable from the principle of sustainability. Amidst the increasingly dynamic competition in banking industry, long-term success can only be achieved when the Bank maintains a balance between economic, social, and environmental performance. Therefore, every strategic step taken is always directed not only at creating financial value, but also at making a positive contribution to society and preserving the environment. This approach serves as the basis for the Bank in establishing a strong and sustainable business foundation.

Untuk memastikan prinsip-prinsip keberlanjutan terintegrasi dalam setiap aktivitas usaha, Bank Victoria telah menyusun dan menerbitkan Rencana Aksi Keuangan Berkelanjutan (RAKB). RAKB ini dirancang berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik. RAKB Bank Victoria secara umum berisi strategi utama dalam mendukung penerapan keuangan berkelanjutan di Indonesia. Strategi tersebut mencakup penguatan struktur organisasi berbasis kinerja, penyesuaian HC sesuai kebutuhan strategis, integrasi aspek sosial dan lingkungan dalam manajemen risiko, serta peningkatan portofolio pembiayaan untuk kegiatan usaha berwawasan lingkungan. Dengan demikian, RAKB menjadi sebuah pedoman dalam penerapan keuangan berkelanjutan di Bank

To ensure that sustainability principles are integrated into every business activity, Bank Victoria has prepared and published the Sustainable Finance Action Plan (RAKB). This RAKB is designed in accordance with the provisions of Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies. Bank Victoria's RAKB generally consists of key strategies to support sustainable finance implementation in Indonesia. These strategies include strengthening performance-based organizational structure, aligning HC according to strategic needs, integrating social and environmental aspects into risk management, and increasing financing portfolio for environmentally-friendly business activities. As such, RAKB becomes a guideline for implementing sustainable finance

Victoria agar berjalan secara terarah dan terukur, sesuai dengan target yang telah direncanakan. Bank Victoria telah menyusun RAKB tahun 2025-2029 yang telah disampaikan kepada Otoritas Jasa Keuangan berdasarkan Surat No. 068/DIR-EKS/11/25 tanggal 28 November 2025.

Prioritas Penerapan Keuangan Berkelanjutan

RAKB yang telah disusun mencerminkan komitmen Bank dalam mengintegrasikan prinsip-prinsip keberlanjutan ke dalam strategi bisnis yang memuat sejumlah prioritas utama yang menjadi landasan dalam pelaksanaan keuangan berkelanjutan, sebagaimana diuraikan berikut:

1. **Pengembangan Kapasitas Internal Bank**
   Untuk meningkatkan kualitas penerapan prinsip keuangan berkelanjutan yang dilakukan, maka kami senantiasa berupaya untuk meningkatkan pemahaman seluruh karyawan melalui berbagai kegiatan pengembangan kompetensi yang diselenggarakan, baik oleh pihak internal maupun eksternal Bank. Secara bertahap, seluruh karyawan telah mendapatkan pengembangan kompetensi dan memahami perihal keuangan berkelanjutan yang sesuai dengan kompleksitas usaha Bank pada tahun 2025.

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

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

2025	**Pemetaan dan Tinjauan** Mapping and Review
2026	Mengintegrasikan Aspek Lingkungan Hidup dan Sosial dalam Kebijakan Tata Kelola Perusahaan Integrating Environmental and Social Aspects in the Corporate Governance Policy

3. **Pengembangan Bisnis yang Mendukung Keuangan Berkelanjutan**
   Dalam rangka mendukung penerapan keuangan berkelanjutan, Bank berkomitmen untuk mendanai proyek bisnis yang ramah lingkungan sebanyak 11% dari kredit yang diberikan untuk sektor industri pengolahan.

at Bank Victoria so that it runs in a directed and measurable manner, according to the planned targets. Bank Victoria has prepared the 2025-2029 RAKB which has been submitted to the Financial Services Authority based on Letter No. 068/DIR-EKS/11/25 dated 28 November 2025.

Priority of Sustainable Finance Implementation

The RAKB that has been prepared reflects the Bank's commitment to integrating sustainability principles into its business strategy, which contains a number of key priorities serving as the basis for implementing sustainable finance, as described below:

1. **Bank's Internal Capacity Development**
   To improve the implementation quality of the sustainable finance principles, we strive to increase personnel's understanding through various competency development activities organized by both internal and external parties of the Bank. Gradually, all employees have attended competence development programs and understood sustainable finance issues in accordance with the Bank's business complexity in 2025.

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

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

3. **Business Development that Supports Sustainable Finance**
   To support the implementation of sustainable finance, the Bank is committed to funding environmentally friendly business projects by 11% of the credit provided to the processing industry sector.

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

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

RAKB Bank Victoria Tahun 2025-2029

Bank Victoria telah merumuskan rencana aksi keberlanjutan yang akan dilaksanakan secara bertahap berdasarkan prioritas strategis dalam penerapan keuangan berkelanjutan. Periode pelaksanaan program ini mencakup tahun 2025 hingga 2029, dengan serangkaian inisiatif yang dirancang untuk mendukung pencapaian tujuan keberlanjutan Bank, sebagaimana dijabarkan berikut:

Program Pertama: Pengembangan Kapasitas Internal Bank

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

Bank Victoria's RAKB 2025-2029

Bank Victoria has formulated sustainability action plans to be implemented gradually based on strategic priorities in sustainable finance implementation. The program's implementation period covers 2025 to 2029, with a series of initiatives designed to support the achievement of the Bank's sustainability goals, as outlined below:

First Program: Bank's Internal Capacity Development

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

Uraian Kegiatan Description of Activities	**Indikator Keberhasilan** Indicator of Success	**Target**					**Penanggung Jawab** Person in Charge	**Target SDGs** SDGs Target
		2025	2026	2027	2028	2029		
Training of Trainers Program.	Menjadi bagian dari *Training* Perihal Keuangan Berkelanjutan. Becoming part of the Sustainable Finance Training.							
Pelatihan terkait penerapan prinsip keuangan berkelanjutan untuk pihak internal. Training related to the application of sustainable finance principles for internal parties.	• Pengurangan penggunaan botol minum plastik; • Penghematan energi; dan • Pelaksanaan pelatihan keuangan berkelanjutan. • Reduction in the usage of plastic drinking bottles; • Energy savings; and • The organization of training in sustainable finance.	**100%**	100%	100%	100%	100%	Human Capital Management & General Affair	4 PENDIDIKAN BERKUALITAS
Pelatihan untuk pihak eksternal yang bekerja sama dengan Divisi Bisnis. Training for external parties cooperating with the Business Division.	Pembinaan bagi debitur atau calon debitur terkait keuangan berkelanjutan. Development activities for debtors or potential debtors related to sustainable finance.	**100%**	100%	100%	100%	100%	Human Capital Management & Divisi Bisnis / Business Division	
Penyesuaian uraian tugas terkait keuangan berkelanjutan. Adjustments to the description of duties related to sustainable finance.	Penyusunan KPI serta uraian tugas dan tanggung jawab yang jelas. Preparing KPI and clear description of duties and responsibilities.	**100%**	100%	100%	100%	100%	Human Capital Management	-
Tantangan [POJK. E.5] **Challenges**	Program ini melibatkan berbagai pihak sehingga sulit untuk mengatur waktu pelatihan dari setiap Divisi. This program involves various parties, making it difficult to arrange training times for each Division.							

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2025	2026	2027	2028	2029		
Strategi/Rencana ke Depan [POJK. A.1] **Future Strategies/Plans**	Mengadakan pelatihan dalam beberapa *batch* sehingga memungkinkan para pemangku kepentingan dapat mengikuti kegiatan pelatihan. Hold training in several batches to enable stakeholders to participate in training activities.							

Program Kedua: Penyesuaian Peraturan Internal Bank

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

Second Program: Adjustment to the Bank's Internal Regulations

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

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2025	2026	2027	2028	2029		
Penyesuaian kebijakan dan/atau SOP yang terkait keuangan berkelanjutan. Adjustments to policies and/or SOP related to sustainable finance.	Penyesuaian kebijakan dan/atau SOP yang terkait dengan keuangan berkelanjutan dengan rencana kerja 5 tahunan Bank. Adjustments to policies and/or SOP concerning sustainable finance to the Bank's 5-year work plan.	**100%**	100%	100%	100%	100%	Compliance, System Procedure & Customer Protection dan Unit Terkait / and Related Unit	-
Tantangan [POJK. E.5] **Challenges**	Keterbatasan waktu yang tersedia untuk menyesuaikan peraturan internal dengan prinsip-prinsip keuangan berkelanjutan. Limited time available to adjust the internal regulations to sustainable finance principles.							
Strategi/Rencana ke Depan [POJK. A.1] **Future Strategies/Plans**	Menetapkan *timeline* program serta melibatkan para pemangku kepentingan dalam proses penentuan dan penyesuaian peraturan internal. Determining the program timeline and involving stakeholders in the process of determining and adjusting internal regulations.							

Program Ketiga: Pengembangan Bisnis yang Mendukung Keuangan Berkelanjutan

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

Third Program: Business Development that Supports Sustainable Finance

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

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2025	2026	2027	2028	2029		
Pembiayaan pada industri manufaktur. Financing for manufacturing industry.	Dilakukan Perubahan Uraian Kegiatan. Changes to the Activity Description.							
Pembiayaan terhadap Usaha yang mendukung keuangan berkelanjutan. Financing for Businesses that support sustainable finance.	Pembiayaan kepada debitur yang memenuhi kriteria kegiatan usaha berkelanjutan sesuai dengan SDGs. Financing to debtors who meet the criteria for sustainable business activities in accordance with the SDGs.	**+ 50 Miliar Billion**	+ 50 Miliar Billion	+ 75 Miliar Billion	+ 75 Miliar Billion	+ 75 Miliar Billion	• SME & *Consumer Banking* • *Commercial Banking*	

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2025	2026	2027	2028	2029		
								
Tantangan [POJK. E.5] **Challenges**	Terbatasnya waktu untuk melakukan pengembangan bisnis melalui penyediaan layanan perbankan kepada debitur yang berwawasan lingkungan. Limited time to carry out business development through the provision of banking services to the environmentally sound debtors.							
Strategi/Rencana ke Depan [POJK. A.1] **Future Strategies/Plans**	Melakukan upaya pemetaan pembiayaan yang didukung kebijakan terkait keuangan berkelanjutan. Conduct financing mapping efforts supported by policies on sustainable finance.							

Program Keempat: Kegiatan Pendukung Keuangan Berkelanjutan

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

Fourth Program: Sustainable Finance Support Activities

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

Uraian Kegiatan Description of Activities	Indikator Keberhasilan Indicator of Success	Target					Penanggung Jawab Person in Charge	Target SDGs SDGs Target
		2025	2026	2027	2028	2029		
Program CSR. CSR Program.	CSR berkelanjutan di bidang kesehatan, pendidikan, dan sosial kemasyarakatan. Sustainable CSR in health, education, and social community.	**100%**	100%	100%	100%	100%	Human Capital Management & Corporate Secretary	
Kebijakan penghematan kertas. Policies for paper saving.	Penghematan kertas dengan penggunaan surat elektronik. Paper saving by using electronic mails.	**20%**	22%	22%	22%	22%	General Affair	
Tantangan [POJK. E.5] **Challenges**	Terbatasnya aktivitas pelaksanaan program CSR akibat percepatan digitalisasi dan meningkatnya persaingan di sektor keuangan, sehingga mempersulit pengukuran dampak kegiatan bagi masyarakat. Limited CSR program implementation activities due to accelerated digitalization and increased competition in financial sector, making it difficult to measure activities' impact on society.							
Strategi/Rencana ke Depan [POJK. A.1] **Future Strategies/Plans**	Melakukan pengukuran melalui survei lapangan atau memanfaatkan data yang dikeluarkan instansi lain yang terkait. Measure by conducting field surveys or utilizing data issued by other relevant agencies.							

Penentuan Isi dan Topik Material Laporan Keberlanjutan

Determining Contents and Material Topics of the Sustainability Report

Pelibatan Pemangku Kepentingan [POJK. E.4]

Pemangku kepentingan memegang peran yang sangat krusial dalam mendukung keberlanjutan dan pertumbuhan jangka panjang bagi Bank Victoria. Bank percaya bahwa keterlibatan aktif pemangku kepentingan, baik internal maupun eksternal merupakan fondasi penting dalam menciptakan nilai bersama dan mendorong keberlanjutan bisnis. Oleh karena itu, Bank secara konsisten membangun komunikasi yang terbuka, hubungan yang konstruktif, dan kolaborasi jangka panjang dengan seluruh pemangku kepentingan. Berdasarkan pemetaan yang dilakukan Bank, berikut pemangku kepentingan dan metode pelibatan yang dilakukan selama tahun pelaporan:

Stakeholders Engagement [POJK. E.4]

Stakeholders play a crucial role in supporting Bank Victoria's long-term sustainability and growth. The Bank believes that active stakeholder engagement, both internal and external, is an essential foundation for creating shared value and driving business sustainability. Therefore, the Bank consistently builds open communication, constructive relationships, and long-term collaboration with all stakeholders. Based on the mapping conducted by the Bank, the following are stakeholders and engagement methods carried out during the reporting year:

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respon terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Nasabah	• Kualitas produk dan jasa perbankan. • Keamanan transaksi perbankan mencakup dana dan informasi nasabah. • Informasi yang jelas dan transparan. • *Reward* bagi nasabah.	• Mengembangkan produk dan jasa Bank. • Meningkatkan keandalan teknologi informasi yang digunakan. • Memastikan keamanan produk dan jasa yang diberikan. • Mengadakan program undian berhadiah.	• Pelaksanaan *customer gathering*. • Pelaksanaan survei kepuasan nasabah. • Penyediaan sarana pengaduan bagi nasabah.	Sepanjang tahun atau sesuai kebutuhan.
Customers	• Quality of banking products and services. • Security of banking transactions including the customer's funds and information. • Clear and transparent information. • Reward for customers.	• Developing the Bank's products and services. • Improving the reliability of the information technology used. • Ensuring the safety of the products and services provided. • Organizing a lucky draw program.	• Organizing customer gathering event. • Conducting customer satisfaction survey. • Providing complaint channel for customers.	All year round or as needed.
Karyawan	• Pemenuhan hak ketenagakerjaan. • Pemenuhan aspek Kesehatan dan Keselamatan Kerja (K3). • Pengembangan kompetensi dan karier. • Kepuasan kerja.	• Memenuhi kontrak kerja dan perjanjian kerja bersama. • Memastikan kecukupan sarana dan prasarana K3. • Melaksanakan pengembangan kompetensi, penilaian kinerja, dan pengembangan karier. • Menyampaikan kebijakan terbaru Bank kepada seluruh karyawan. • Menyelenggarakan program beasiswa bagi anak karyawan.	• Penyelenggaraan *gathering* karyawan dan *Focus Group Discussion* (FGD). • Penyediaan WBS untuk melaporkan pelanggaran praktik ketenagakerjaan di lingkungan Bank. • Pelaksanaan berbagai kegiatan pendidikan dan pelatihan, serta promosi atau mutasi. • Pelaksanaan survei kepuasan karyawan.	Sepanjang tahun atau sesuai rencana pelaksanaan program.

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respon terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Employee	• Fulfillment of employees' rights. • Fulfillment of Occupational Health And Safety (OHS) aspect. • Competency and career development. • Job satisfaction.	• Fulfilling work contracts and collective labor agreements. • Ensuring the adequacy of OHS facilities and infrastructures. • Conducting competency development, performance assessment, and career development. • Delivering the latest Bank policies to all employees. • Providing scholarships for employees' children.	• Organizing employee gathering and Focus Group Discussion (FGD). • Provision of a WBS to report violations of labor practice within the Bank. • Implementation of various educational and training activities, as well as promotions or transfers. • Implementation of employee satisfaction survey.	All year round or according to the program implementation plan.
Pemerintah dan Regulator	• Kepatuhan terhadap peraturan yang berlaku. • Pemenuhan kewajiban perpajakan.	• Memastikan pemenuhan seluruh peraturan yang berlaku bagi Bank. • Meningkatkan kualitas pelaksanaan GCG. • Membayar pajak dan Penerimaan Negara Bukan Pajak (PNBP).	• Penyampaian Laporan Tahunan, Laporan Keberlanjutan, Laporan GCG, dan laporan lainnya. • Pembayaran dan pelaporan pajak dan PNBP.	Sesuai waktu yang ditentukan, sesuai kebutuhan, atau setiap tahun.
Government and Regulator	• Compliance with the applicable regulations. • Fulfillment of taxation obligations.	• Ensuring compliance with all regulations applicable to the Bank. • Improving the quality of GCG implementation. • Paying taxes and Non-Tax State Revenue (PNBP).	• Submission of Annual Report, Sustainability Report, GCG Report, and other reports. • Payment and reporting of taxes and PNBP.	According to the time set, needs, or annually.
Pemegang Saham dan Investor	• Kinerja keuangan dan non-keuangan. • Keberlanjutan usaha. • Informasi yang jelas dan terkini terkait arah strategis Bank.	• Menyusun RBB dan RAKB. • Menjaga kinerja Bank tetap optimal dan sesuai target, dengan memperhatikan aspek ekonomi, sosial, dan lingkungan. • Menyampaikan informasi mutakhir secara transparan.	• Pelaksanaan RUPS. • Penyampaian Laporan Tahunan dan Laporan Keberlanjutan. • Akses informasi dalam situs web Bank.	Sesuai waktu yang ditentukan, sesuai kebutuhan, atau setiap tahun.
Shareholders and Investors	• Financial and non-financial performance. • Business sustainability. • Clear and updated information related to the Bank's strategic direction.	• Preparing the RBB and RAKB. • Maintaining the Bank's performance to keep optimal and on target, by considering the economic, social, and environmental aspects. • Delivering the latest information transparently.	• Convention of the GMS. • Submission of Annual Report and Sustainability Report. • Access to information on the Bank's website.	According to the time set, needs, or annually.
Mitra Usaha	• Pemenuhan kontrak kerja. • Kepuasan kerja sama.	• Melakukan kerja sama yang adil dan transparan sesuai dengan peraturan dan kontrak kerja yang berlaku. • Membangun hubungan kerja yang harmonis dengan mitra usaha.	• Perumusan kontrak kerja sama. • Pelaksanaan pertemuan berkala.	Sepanjang tahun atau sesuai kebutuhan.
Business Partners	• Fulfillment of work contracts. • Cooperation satisfaction.	• Conducting fair and transparent cooperation in accordance with the applicable regulations and work contracts. • Building harmonious working relationship with business partners.	• Formulation of cooperation contract. • Organizing regular meetings.	All year round or as needed.
Masyarakat	• Informasi aktivitas dan perkembangan usaha Bank. • Peningkatan kesejahteraan masyarakat.	• Melibatkan masyarakat dalam program kemitraan dan aksi sosial Bank. • Memberikan kesempatan kerja. • Menyampaikan informasi mutakhir dalam media sosial Bank.	• Pelaksanaan berbagai program pengembangan masyarakat dan kemitraan. • Penyediaan sarana pengaduan bagi masyarakat. • Penyediaan akses informasi dalam media sosial Bank.	Sesuai rencana pelaksanaan atau sesuai kebutuhan.
Community	• Information on the Bank's business activities and development. • Improvement of public welfare.	• Engaging the community in partnership program and the Bank's social acts. • Providing job opportunities. • Delivering latest information on the Bank's social media.	• Conducting various community and partnership development programs. • Providing complaint channel for communities. • Providing access to information on the Bank's social media.	According to the implementation plan or as necessary.

Kelompok Pemangku Kepentingan Stakeholders Group	Kebutuhan Pemangku Kepentingan Stakeholders Needs	Respon terhadap Kebutuhan Pemangku Kepentingan Respond to Stakeholders Needs	Metode Pelibatan Engagement Methods	Frekuensi Pelaksanaan Implementation Frequency
Media	• Kinerja keuangan dan non-keuangan Bank. • Informasi terkait perkembangan Bank. • The Bank's financial and non-financial performance. • Information related to the Bank's development.	Menyediakan informasi secara transparan dan relevan melalui media sosial Bank. Providing transparent and relevant information through the Bank's social media.	• Pelaksanaan paparan publik dan media *gathering*. • Pemutakhiran informasi pada media sosial Bank. • Conducting public expose and organizing media gathering. • Updating information on the Bank's social media.	Sesuai kebutuhan. As necessary.

Penentuan Topik Material

Bank Victoria menetapkan topik material melalui proses yang sistematis dengan melibatkan identifikasi pemangku kepentingan serta pemahaman terhadap kebutuhan dan ekspektasi mereka. Proses ini bertujuan untuk memastikan bahwa isu-isu yang bersifat strategis dan material bagi keberlanjutan Bank mendapat perhatian utama dan terintegrasi dalam kebijakan serta strategi keberlanjutan.

Pada tahun 2025, Bank Victoria menetapkan sejumlah topik material yang menjadi fokus utama Bank dalam mendukung keberlanjutan usaha, sebagaimana diuraikan berikut:

Determining the Material Topic

Bank Victoria identifies material topics through a systematic process that involves identifying stakeholders and understanding their needs and expectations. This process aims to ensure that strategic and material issues for the Bank's sustainability receive primary attention and are integrated into its sustainability policies and strategies.

As of 2025, Bank Victoria identified a number of material topics as the Bank's primary focus in supporting business sustainability, as outlined below:

Isu Material Bank Material Issues for the Bank	Peluang untuk Bank jika Isu Dikelola Opportunities for the Bank if Issues Managed	Potensi Risiko untuk Bank jika Isu Tidak Dikelola Potential Risks for the Bank if Issues Not Managed
Aspek Tata Kelola Governance Aspects		
Etika bisnis Bank senantiasa menerapkan prinsip serta standar perilaku yang menjadi pedoman dalam melaksanakan kegiatan usaha secara jujur, transparan, adil, dan bertanggung jawab. Hal ini mencakup upaya pencegahan konflik kepentingan, korupsi dan *fraud*, perlindungan nasabah, kepatuhan terhadap peraturan, serta penegakan kode etik di seluruh organisasi. **Business Ethics** The Bank consistently applies principles and standards of conduct that serve as guidelines for conducting business activities in an honest, transparent, fair, and responsible manner. This includes efforts to prevent conflicts of interest, corruption and fraud, customer protection, regulatory compliance, and enforcement of the code of conduct throughout the organization.	• Meningkatkan kepercayaan nasabah, investor, dan regulator. • Memperkuat reputasi dan kredibilitas bank. • Mendukung penerapan GCG dan kepatuhan regulasi secara berkelanjutan. • Memperkuat pengendalian internal dan pencegahan *fraud*. • Enhancing customer, investor, and regulatory trust. • Strengthening the Bank's reputation and credibility. • Supporting GCG implementation and ongoing regulatory compliance. • Strengthening internal controls and fraud prevention.	• Menurunnya kepercayaan publik dan pemangku kepentingan. • Risiko reputasi akibat persepsi lemahnya integritas dan transparansi. • Peningkatan risiko hukum, sanksi regulator, dan denda. • Meningkatnya potensi *fraud* dan konflik kepentingan. • Decreasing public and stakeholder trust. • Reputational risk due to perceptions of weak integrity and transparency. • Increasing legal risk, regulatory sanctions, and fines. • Increasing potential for fraud and conflicts of interest.

Isu Material Bank Material Issues for the Bank	Peluang untuk Bank jika Isu Dikelola Opportunities for the Bank if Issues Managed	Potensi Risiko untuk Bank jika Isu Tidak Dikelola Potential Risks for the Bank if Issues Not Managed
Manajemen Risiko Sistemik Manajemen risiko penting bagi Bank untuk menjaga ketahanan usaha dan stabilitas sistem keuangan. Melalui pengelolaan risiko yang terintegrasi dan *prudent,* Bank dapat mengantisipasi dampak gejolak ekonomi, memitigasi risiko likuiditas, kredit, dan pasar, serta menjaga kepercayaan pemangku kepentingan dan kepatuhan terhadap ketentuan regulator.	• Meningkatkan kepercayaan regulator, investor, dan masyarakat terhadap ketahanan bank. • Memperkuat reputasi bank sebagai institusi yang *prudent* dan resilien. • Mendukung pengambilan keputusan strategis berbasis manajemen risiko yang kuat. • Meningkatkan kesiapan bank dalam menghadapi krisis dan gejolak ekonomi. • Memperkuat penerapan GCG dan manajemen risiko terintegrasi.	• Menurunnya kepercayaan pemangku kepentingan terhadap ketahanan bank. • Peningkatan risiko likuiditas, kredit, dan pasar yang tidak terkelola secara memadai. • Risiko sanksi atau pengawasan ketat dari regulator akibat lemahnya transparansi. • Kerentanan bank terhadap krisis sistemik dan gejolak ekonomi. • Dampak negatif terhadap reputasi dan keberlanjutan usaha bank.
Systemic Risk Management Risk management is crucial for the Bank to maintain its business resilience and financial system stability. Through integrated and prudent risk management, the Bank can anticipate the impact of economic turmoil, mitigate liquidity, credit, and market risks, and maintain stakeholder trust and compliance with regulatory requirements.	• Enhancing regulatory, investor, and public confidence in the Bank's resilience. • Strengthening the Bank's reputation as a prudent and resilient institution. • Supporting strategic decision-making based on robust risk management. • Enhancing the Bank's readiness in facing crises and economic turmoil. • Strengthening GCG implementation and integrated risk management.	• Decreasing stakeholder confidence in the Bank's resilience. • Increasing liquidity, credit, and market risks inadequately managed. • Risk of sanctions or stricter regulatory oversight due to weak transparency. • Bank vulnerability to systemic crises and economic turmoil. • Negative impact on the Bank's reputation and business sustainability.
Aspek Sosial **Social Aspects**		
Inklusi Keuangan dan Akses Layanan UMKM Bank memiliki peran strategis dalam menyediakan layanan keuangan yang mudah diakses oleh UMKM dan masyarakat yang sebelumnya tidak terlayani.	• Memperluas pangsa pasar dan jumlah nasabah, khususnya segmen UMKM. • Meningkatkan reputasi bank sebagai lembaga yang mendukung pertumbuhan ekonomi inklusif. • Mendukung pencapaian SDG terkait pengentasan kemiskinan dan pemberdayaan ekonomi. • Membuka peluang untuk program pembiayaan inovatif dan produk digital keuangan.	• Risiko reputasi karena dianggap tidak peduli terhadap masyarakat dan UMKM. • Kehilangan peluang bisnis di segmen pasar yang berkembang pesat. • Potensi tekanan dari regulator atau pemangku kepentingan untuk meningkatkan akses keuangan.
Financial Inclusion and Access to MSME Services The Bank has a strategic role in providing easily accessible financial services to MSMEs and previously underserved communities.	• Expanding market share and customer base, particularly in MSME segment. • Enhancing the Bank's reputation as an institution that supports inclusive economic growth. • Supporting the achievement of SDGs related to poverty alleviation and economic empowerment. • Opening opportunities for innovative financing programs and digital financial products.	• Reputational risk due to perceived indifference to the community and MSMEs. • Missing out business opportunities in the rapidly growing market segment. • Potential pressure from regulators or stakeholders to increase financial access.
Perlindungan Data Nasabah dan Keamanan Siber Bank menyimpan data sensitif nasabah dalam jumlah besar, termasuk informasi pribadi, transaksi keuangan, dan data kartu kredit. Risiko kebocoran data, serangan siber, atau pencurian identitas sangat tinggi jika sistem keamanan tidak memadai.	• Meningkatkan kepercayaan nasabah dan investor karena menunjukkan komitmen terhadap keamanan informasi. • Memperkuat reputasi bank sebagai lembaga yang aman dan terpercaya. • Mengurangi risiko litigasi atau denda regulator akibat kebocoran data.	• Risiko reputasi serius jika terjadi kebocoran atau serangan siber. • Potensi kerugian finansial dari tuntutan hukum, denda, atau kompensasi kepada nasabah. • Kehilangan kepercayaan nasabah, yang dapat menurunkan volume transaksi dan loyalitas.
Customer Data Protection and Cybersecurity The Bank stores large amounts of sensitive customer data, including personal information, financial transactions, and credit card data. The risk of data breaches, cyberattacks, or identity theft is very high if security systems are inadequate.	• Increasing customer and investor confidence by demonstrating a commitment to information security. • Strengthening the Bank's reputation as a safe and trustworthy institution. • Reducing the risk of litigation or regulatory fines due to data breaches.	• Serious reputational risks in the event of a breach or cyberattack. • Potential financial losses from lawsuits, fines, or compensation to customers. • Loss of customer trust, which can reduce transaction volume and loyalty.

Isu Material Bank Material Issues for the Bank	Peluang untuk Bank jika Isu Dikelola Opportunities for the Bank if Issues Managed	Potensi Risiko untuk Bank jika Isu Tidak Dikelola Potential Risks for the Bank if Issues Not Managed
Aspek Lingkungan Environmental Aspects		
Emisi Karbon dan Efisiensi Energi di Operasional Bank Bank memiliki peluang untuk mengurangi jejak karbon melalui efisiensi energi dan praktik ramah lingkungan dalam menjalankan operasionalnya.	• Meningkatkan reputasi bank sebagai lembaga yang peduli lingkungan dan berkelanjutan. • Potensi penghematan biaya operasional melalui efisiensi energi. • Mendukung target nasional dan internasional terkait pengurangan emisi karbon.	• Risiko reputasi jika dianggap tidak ramah lingkungan atau tertinggal dalam praktik keberlanjutan. • Potensi biaya operasional lebih tinggi jika efisiensi energi tidak diterapkan. • Risiko regulasi atau kebijakan pemerintah terkait emisi karbon. • Tekanan dari pemangku kepentingan dan masyarakat terkait keberlanjutan lingkungan.
Carbon Emissions and Energy Efficiency in Bank Operations The Bank has the opportunity to reduce carbon footprint through energy efficiency and environmentally friendly practices in implementing its operations.	• Enhancing the Bank's reputation as an environmentally conscious and sustainable institution. • Potential operational cost savings through energy efficiency. • Supporting national and international targets related to carbon emission reduction.	• Reputational risk if perceived as environmentally unfriendly or falling behind in sustainability practices. • Potential higher operational costs if energy efficiency not implemented. • Risk of government regulations or policies related to carbon emissions. • Pressure from stakeholders and public regarding environmental sustainability.
Pembiayaan Proyek Berwawasan Lingkungan Bank menyalurkan kredit atau investasi ke proyek atau bisnis yang menerapkan praktik ramah lingkungan. Hal ini penting untuk mendukung transisi energi dan pembangunan berkelanjutan.	• Menarik investor dan nasabah yang peduli lingkungan. • Membuka akses ke instrumen pembiayaan hijau, seperti *green bonds* atau *sustainable finance*. • Mendukung pencapaian target nasional dan global terkait pengurangan emisi karbon. • Memperluas portofolio kredit yang sejalan dengan tren ekonomi hijau.	• Kehilangan peluang bisnis di sektor hijau yang berkembang pesat. • Risiko reputasi jika bank dianggap tidak mendukung keberlanjutan lingkungan. • Potensi tekanan dari regulator atau pemangku kepentingan terkait dukungan terhadap proyek ramah lingkungan. • Bank tertinggal dibanding pesaing yang lebih agresif dalam pembiayaan hijau.
Environmentally Friendly Project Financing The Bank channels credit or investment to projects or businesses that implement environmentally friendly practices. This is important to support energy transition and sustainable development.	• Attracting investors and customers who care about the environment. • Opening access to green financing instruments, such as green bonds or sustainable finance. • Supporting the achievement of national and global targets related to carbon emission reduction. • Expanding credit portfolio in line with green economy trends.	• Missing out business opportunities in the rapidly growing green sector. • Reputational risk if the Bank is perceived not supporting environmental sustainability. • Potential pressure from regulators or stakeholders regarding support for environmentally friendly projects. • The Bank falls behind more aggressive competitors in green financing.

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530 **Verifikasi Tertulis dari Pihak Independen /** Written Verification from Independent Party
531 **Lembar Umpan Balik /** Feedback Form
533 **Kriteria Penyampaian Laporan Tahunan berdasarkan Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 /** Criteria for Annual Report Submission based on Financial Services Authority Circular No. 16/SEOJK.04/2021
555 **Laporan Keuangan Tanggal 31 Desember 2025 /** Financial Statements as of 31 December 2025

Kilas Kinerja
Performance Highlights





01.

Kinerja Tahun 2025
2025 Performance

Kinerja Ekonomi
Economic Performance

Dana Pihak Ketiga
Third-Party Funds

Triliun / Trillion

2025	2024
▲ 4.13%	Rp24.29	Rp23.33

Pinjaman yang Diberikan - Bersih
Loans - Net

Triliun / Trillion

2025	2024
▲ 8.50%	Rp21.82	Rp20.11

Pendapatan Bunga
Interest Income

Triliun / Trillion

2025	2024
▲ 10.89%	Rp2.30	Rp2.08

Kinerja Sosial
Social Performance

Total Karyawan Wanita
Total Female Employees

Orang / People

2025	2024
▼ 3.90%	345	359

Penerima Manfaat Pengembangan Sosial dan Kemasyarakatan
Beneficiaries of Social and Community Development

Orang / People

2025	2024
▼ 39.29%	910	1,499

Biaya Investasi Sosial
Social Investment Cost

2025	2024
▼ 63.65%	Rp439,394,194	Rp1,208,651,520

Kinerja Lingkungan
Environmental Performance

Penggunaan Energi
Energy Use

GJ

▼ 14.32%

2025	2024
6,227.15	7,268.17

Penggunaan Air
Water Use

m^3

▲ 2.22%

2025	2024
20,525.30	20,080.38

Emisi yang Dihasilkan
Emissions Generated

Ton CO_2eq

▲ 18.15%

2025	2024
1,179.41	1,440.99

Ikhtisar Kinerja Keberlanjutan
Sustainability Performance Highlights

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

Kinerja Keuangan
Financial Performance

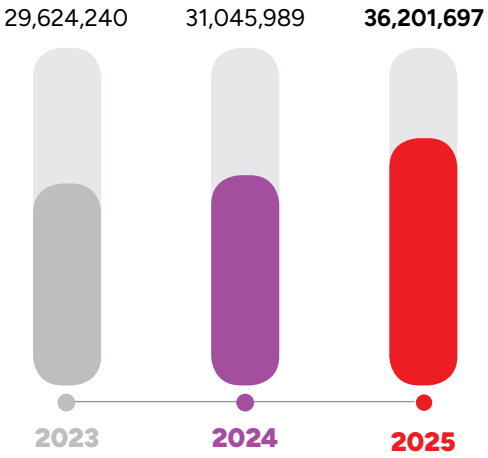
(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	2023	Description
Laporan Posisi Keuangan Konsolidasian **Consolidated Statements of Financial Position**				
Total Aset	**36,201,697**	31,045,989	**29,624,240**	**Total Assets**
Total Aset Keuangan	**35,379,356**	30,096,308	28,453,735	Total Financial Assets
Total Aset Non-Keuangan	**822,341**	949,681	1,170,505	Total Non-Financial Assets
Total Liabilitas	**31,832,776**	27,112,530	**25,799,455**	**Total Liabilities**
Total Liabilitas Keuangan	**31,739,119**	27,032,075	25,730,307	Total Financial Liabilities
Total Liabilitas Non-Keuangan	**93,657**	80,455	69,148	Total Non-Financial Liabilities
Total Ekuitas	**4,368,921**	3,933,459	**3,824,785**	**Total Equity**
Laporan Laba Rugi dan Penghasilan Komprehensif Lain Konsolidasian **Consolidated Statements of Profit or Loss and Other Comprehensive Income**				
Pendapatan Bunga	**2,302,354**	2,076,268	1,836,391	Interest Income
Beban Bunga	**(1,743,637)**	(1,527,667)	(1,257,662)	Interest Expense
Pendapatan Bunga - Bersih	**558,717**	548,601	578,729	Interest Income – Net
Pendapatan Operasional Lainnya	**533,277**	365,736	253,365	Other Operating Income
Beban Operasional Lainnya	**(870,025)**	(621,366)	(658,023)	Other Operating Expenses
Laba Operasional	**221,968**	292,970	174,071	Profit from Operations
Beban Non-Operasional - Bersih	**(59,615)**	(144,310)	(44,535)	Non-Operating Expense - Net
Laba Sebelum Beban Pajak Penghasilan	**162,354**	148,660	129,536	Profit Before Income Tax Expense
Beban Pajak Penghasilan - Bersih	**(30,609)**	(30,801)	(27,720)	Income Tax Expense - Net
Laba Bersih yang dapat Diatribusikan kepada:	**131,745**	117,859	101,816	Net Income Attributable to:
Pemilik Entitas Induk	**131,745**	117,859	101,816	Equity Holders of the Parent Entity
Kepentingan Non-Pengendali	**-**	-	-	Non-Controlling Interest
Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan	**30,075**	(83,091)	24,405	Other Comprehensive Income (Loss), Net of Income Tax
Penghasilan Komprehensif yang Dapat Diatribusikan kepada:	**161,820**	34,768	126,222	Comprehensive Income Attributable to:
Pemilik Entitas Induk	**161,820**	34,768	126,222	Equity Holders of the Parent Entity
Kepentingan Non-Pengendali	**-**	-	-	Non-Controlling Interest
Laba Bersih per Saham yang Dapat Diatribusikan kepada Pemilik Entitas Induk				Income per Share Attributable to Entity Holders of the Parent Entity
Dasar (Rupiah penuh)	**7.15**	7.44	6.42	Basic (full Rupiah)
Dilusian (Rupiah penuh)	**7.15**	7.44	6.42	Diluted (full Rupiah)

Uraian	2025	2024	2023	Description
Laporan Arus Kas Konsolidasian **Consolidated Statements of Cash Flows**				
Arus Kas Bersih Diperoleh dari/ (Digunakan untuk) Aktivitas Operasi	**1,757,587**	(942,316)	1,279,308	Net Cash Flow Provided from/(Used in) Operating Activities
Arus Kas Bersih Digunakan untuk Aktivitas Investasi	**(2,240,713)**	(1,193,957)	(1,413,275)	Net Cash Flows Used in Investing Activities
Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan	**1,890,558**	937,081	287,343	Net Cash Flows Provided from Financing Activities
Kas dan Setara Kas pada Akhir Tahun	**3,006,803**	1,599,372	2,798,564	Cash and Cash Equivalents at End of Year
Rasio Keuangan (dalam %) **Financial Ratios (in %)**				
Permodalan				**Capital**
KPMM dengan Memperhitungkan Risiko Kredit dan Operasional	**24.56**	22.38	20.69	CAR by Calculating Credit and Operational Risk
KPMM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar	**23.84**	21.53	19.95	CAR by Calculating Credit, Operational, and Market Risk
Aktiva Tetap terhadap Modal	**7.44**	8.86	11.08	Fixed Assets to Capital
Aset Produktif				**Earning Assets**
Aset Produktif dan Non-Produktif Bermasalah terhadap Total Aset Produktif dan Non-Produktif	**2.11**	3.04	3.91	Non-Performing Earning Assets and Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah terhadap Total Aset Produktif	**1.63**	2.35	2.79	Non-Performing Earning Assets to Total Earning Assets
CKPN Aset Keuangan terhadap Aset Produktif	**1.64**	1.57	2.19	CKPN of Financial Assets to Earning Assets
Pemenuhan CKPN Aset Produktif	**115.39**	119.37	165.67	CKPN Fulfillment of Earning Assets
NPL Bruto	**2.49**	3.27	3.99	Gross NPL
NPL Neto	**1.73**	2.36	3.24	Net NPL
Profitabilitas				**Profitability**
ROA	**0.50**	0.51	0.48	ROA
ROE	**3.41**	3.41	3.12	ROE
NIM	**2.05**	2.21	2.58	NIM
BOPO	**92.17**	88.00	91.67	BOPO
Rasio Laba terhadap Total Aset	**0.36**	0.38	0.34	Income to Total Assets Ratio
Rasio Laba terhadap Total Ekuitas	**3.02**	3.00	2.66	Income to Total Equity Ratio
Rasio Laba terhadap Pendapatan Bunga	**23.58**	21.48	17.59	Income to Interest Income
Rasio Liabilitas terhadap Total Aset	**87.93**	87.33	87.09	Liabilities to Total Assets Ratio
Rasio Liabilitas terhadap Total Ekuitas	**728.62**	689.29	674.53	Liabilities to Total Equity Ratio
Likuiditas				**Liquidity**
LDR	**92.12**	88.12	83.06	LDR
LFR	**84.32**	86.27	81.93	LFR
Rasio Aktiva Keuangan terhadap Liabilitas Keuangan	**113.72**	114.51	114.83	Financial Assets to Financial Liabilities Ratio
Kepatuhan				**Compliance**
Persentase Pelanggaran BMPK				Percentage of LLL Violation
Pihak Terkait	**0.00**	0.00	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	0.00	Non-Related Parties

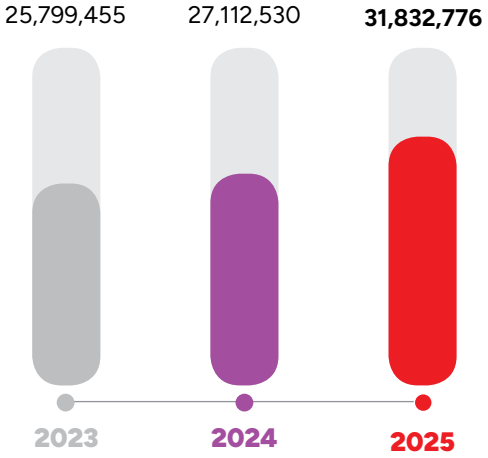
Uraian	2025	2024	2023	Description
Persentase Pelampauan BMPK				Percentage of LLL Excess
Pihak Terkait	**0.00**	0.00	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	0.00	Non-Related Parties
GWM Primer - Rupiah	**4.58**	6.67	7.32	Primary GWM - Rupiah
GWM Primer - Valas	**4.05**	4.05	4.05	Primary GWM - Foreign Exchange
GWM Sekunder - Rupiah	**23.29**	21.78	23.73	Secondary GWM - Rupiah
Posisi Devisa Neto (PDN) secara Keseluruhan	**0.10**	0.21	0.39	Net Open Position (NOP) in Overall

Total Aset
Total Assets



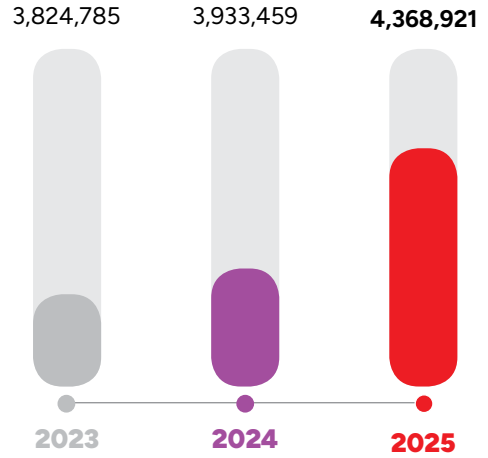
(dalam juta Rupiah / in million Rupiah)

Total Liabilitas
Total Liabilities



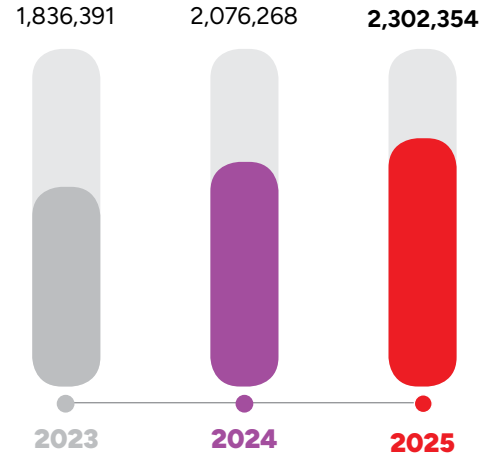
(dalam juta Rupiah / in million Rupiah)

Total Ekuitas
Total Equity



(dalam juta Rupiah / in million Rupiah)

Pendapatan Bunga
Interest Income



(dalam juta Rupiah / in million Rupiah)

Kinerja Operasional
Operational Performance

Uraian	2025	2024	2023	Description
Produk Simpanan (dalam unit rekening) **Deposit Products (in account unit)**				
Tabungan	**45,237**	52,529	41,191	Saving Deposits
Giro	**2,755**	3,114	2,564	Current Accounts
Deposito Berjangka	**21,935**	22,759	18,781	Time Deposits
Negotiable Certificate Deposits	**61**	181	150	Negotiable Certificate Deposits
Total	**69,988**	**78,583**	**62,686**	**Total**
Produk Pinjaman (dalam juta Rupiah) **Loan Products (in million Rupiah)**				
Pinjaman Tetap	**10,884,934**	10,085,769	9,697,513	Fixed Loans
Pinjaman Konsumen	**178,400**	167,347	164,627	Consumer Loans
Pinjaman Rekening Koran	**1,946,813**	2,122,250	1,871,767	Overdraft Loans
Pinjaman Tetap dengan Angsuran	**9,297,680**	8,110,450	6,864,293	Fixed Loans with Installments
Pinjaman Serba Guna	**72,339**	74,045	30,543	Multipurpose Loans
Total	**22,380,166**	**20,559,860**	**18,628,743**	**Total**

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

Uraian	Satuan Unit	2025	2024	2023	Description
Pengelolaan *Human Capital* **Human Capital Management**					
Total Karyawan	Orang People	**723**	746	713	Total Employees
Karyawan Wanita	%	**47.72**	48.12	47.55	Female Employees
Jam Pelatihan/Karyawan	Jam/Orang Hours/People	**5**	5	5	Training Hours/Employee
Karyawan Lokal*	%	**67.01**	68.36	67.46	Local Employees*
Pengembangan Sosial dan Kemasyarakatan **Social and Community Development**					
Penerima Manfaat	Orang People	**910**	1,499	2,072	Beneficiaries
Biaya Investasi Sosial	Rupiah	**439,394,194**	1,208,651,520	179,610,888	Social Investment Cost

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

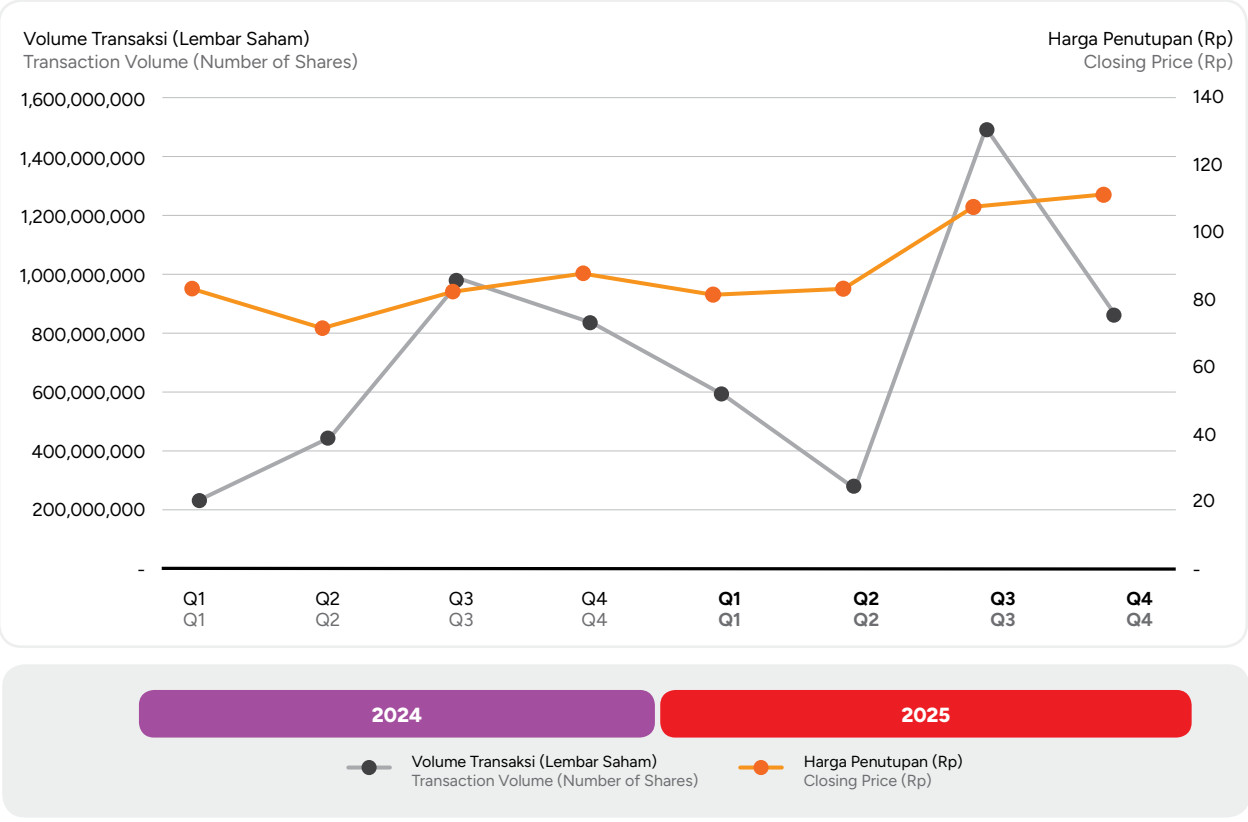
Keberlanjutan Lingkungan Hidup [POJK B.2]
Environmental Sustainability

Uraian	Satuan Unit	2025	2024	2023	Description
Pembiayaan Pertimbangan Aspek Lingkungan	Juta Rupiah Million Rupiah	**426,752**	601,964	623,231	Financing by Considering Environmental Aspect
Debitur yang Memperoleh PROPER	Entitas Entity	**-**	-	-	Debtor Receiving PROPER
Penggunaan Listrik	GJ	**3,925.84**	4,914.20	4,774.83	Use of Electricity
Penggunaan BBM	GJ	**2,301.31**	2,353.97	2,262.32	Use of Fuel
Penggunaan Air	m^3	**20,525.30**	20,080.38	18,746.74	Water Use
Penggunaan Kertas	Rim Ream	**2,283**	1,911	1,935	Paper Use
Limbah yang Dihasilkan	Ton	**4,00**	3,34	3,39	Waste Generated
Emisi yang Dihasilkan	TonCO_2eq	**1,179.41**	1,440.99	1,398.46	Emissions Generated
Keanekaragaman Hayati	Penanaman Pohon Tree Planting	**-**	-	-	Biodiversity

Ikhtisar Saham
Share Highlights

Periode Period	Harga Pembukaan Opening Price (Rp)	Harga Terendah Lowest Price (Rp)	Harga Tertinggi Highest Price (Rp)	Harga Penutupan Closing Price (Rp)	Volume Transaksi (Lembar Saham) Transaction Volume (Total Shares)	Total Saham Beredar (Lembar Saham) Total Outstanding Shares (Total Shares)	Kapitalisasi Pasar Market Capitalization (Rp)
2025							
Kuartal I Quarter I	**89**	**75**	**118**	**82**	**560,181,500**	**15,848,539,597**	**1,299,580,246,954**
Kuartal II Quarter II	**78**	**70**	**99**	**84**	**226,017,800**	**18,415,207,922**	**1,546,877,465,448**
Kuartal III Quarter III	**84**	**84**	**149**	**111**	**1,513,087,300**	**18,415,213,598**	**2,044,088,709,378**
Kuartal IV Quarter IV	**112**	**97**	**126**	**115**	**836,600,100**	**18,419,418,828**	**2,118,233,165,220**

Periode Period	Harga Pembukaan Opening Price (Rp)	Harga Terendah Lowest Price (Rp)	Harga Tertinggi Highest Price (Rp)	Harga Penutupan Closing Price (Rp)	Volume Transaksi (Lembar Saham) Transaction Volume (Total Shares)	Total Saham Beredar (Lembar Saham) Total Outstanding Shares (Total Shares)	Kapitalisasi Pasar Market Capitalization (Rp)
2024							
Kuartal I Quarter I	98	83	98	84	185,009,540	15,848,526,679	1,331,276,241,036
Kuartal II Quarter II	84	50	89	71	409,000,931	15,848,527,062	1,125,245,421,402
Kuartal III Quarter III	72	70	92	83	972,724,406	15,848,530,226	1,315,428,008,758
Kuartal IV Quarter IV	84	79	112	89	816,757,322	15,848,532,906	1,410,519,428,634



Aksi Korporasi

Sepanjang tahun 2025, Bank Victoria telah melaksanakan aksi korporasi berupa Pencatatan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria International Tbk dengan jangka waktu pelaksanaan dimulai pada 19 Juni 2023 sampai 18 Desember 2025. Hingga tanggal 31 Desember 2025, jumlah saham yang telah diterbitkan melalui pelaksanaan waran serta sisa waran yang masih beredar adalah sebagai berikut:

Corporate Actions

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

Waktu Time	Total Saham Sebelum Penambahan Saham Hasil *Exercise* Waran Seri VII Total Shares Before Addition of Shares Resulting from Exercise of Series VII Warrants	Total Penambahan Waran Seri VII Total Additional Series VII Warrants	Total Saham Setelah Penambahan Saham Hasil *Exercise* Waran Seri VII Total Shares After Addition of Shares Resulting from Exercise of Series VII Warrants	Sisa Waran Seri VII Remaining Series VII Warrants
Juni-Desember 2023 June-December 2023	15,848,234,714	**1,064**	15,848,235,778	2,573,669,053
Januari-Desember 2024 January-December 2024	15,848,235,778	**297,128**	15,848,532,906	2,573,371,925
Januari 2025 January 2025	15,848,532,906	**5,573**	15,848,538,479	2,573,366,352
Februari 2025 February 2025	15,848,538,479	**500**	15,848,538,979	2,573,365,852
Maret 2025 March 2025	15,848,538,979	**618**	15,848,539,597	2,573,365,234
April 2025	15,848,539,597	**343**	15,848,539,940	2,573,364,891
Mei 2025 May 2025	15,848,539,940	**685**	15,848,540,625	2,573,364,206
Juni 2025 June 2025	15,848,540,625	**2,566,667,297**	18,415,207,922	6,696,909
Juli 2025 July 2025	18,415,207,922	**1,215**	18,415,209,137	6,695,694
Agustus 2025 August 2025	18,415,209,137	**1,794**	18,415,210,931	6,693,900
September 2025	18,415,210,931	**2,667**	18,415,213,598	6,691,233
Oktober 2025 October 2025	18,415,213,598	**3,031**	18,415,216,629	6,688,202
November 2025	18,415,216,629	**4,419**	18,415,221,048	6,683,783
Desember 2025 December 2025	18,415,221,048	**4,197,780**	18,419,418,828	-

Keterangan / Note: Pencatatan penambahan saham hasil exercise waran seri berlaku sampai tanggal 18 Desember 2025. / Additional shares listing resulting from exercise of serial warrants was valid until 18 December 2025.

Selain melakukan pencatatan penambahan saham hasil *exercise* waran seri, Bank juga melakukan aksi korporasi berupa penawaran umum obligasi sebagai berikut:

1. **Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025**

   Penawaran umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 dilaksanakan pada Juni 2025 dengan nilai pokok sebesar Rp500.000.000.000,-. Obligasi ini ditawarkan dengan nilai 100% dari nilai pokok obligasi dengan tingkat bunga tetap sebesar 10,00% per tahun dengan jangka waktu 5 (lima) tahun sejak tanggal emisi. Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak tanggal emisi pada tanggal pembayaran bunga obligasi pertama kali, yaitu tanggal 18 September 2025, sedangkan pembayaran bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo, yaitu pada tanggal 18 Juni 2030.

Aside from recording additional shares from the exercise of serial warrants, the Bank also conducted corporate action in the form of public offering of bonds as follows:

1. **Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025**

   The public offering of Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025 was conducted in June 2025 with a principal value of Rp500,000,000,000. These bonds are offered at a value of 100% of the principal value of bonds with fixed rate of 10.00% per annum with a term of 5 (five) years since emission date. Interest of the bond paid every 3 (three) months starting from emission date, 18 September 2025, for the first payment whereas the last payment will be on 18 June 2030 at the maturity date of the bond.

2. **Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025**
   Penawaran umum Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 dilaksanakan pada Juli 2025 dengan nilai pokok sebesar Rp750.000.000.000,-. Obligasi ini ditawarkan dengan nilai 100,00% dari nilai pokok obligasi dengan tingkat bunga tetap sebesar 9,00% per tahun dengan jangka waktu 3 (tiga) tahun sejak tanggal emisi. Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak tanggal emisi pada tanggal pembayaran bunga obligasi pertama kali, yaitu tanggal 4 Oktober 2025, sedangkan pembayaran bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo, yaitu pada tanggal 4 Juli 2028.
3. **Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025**
   Penawaran umum Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 dilaksanakan pada September 2025 dengan nilai pokok sebesar Rp750.000.000.000. Obligasi ini ditawarkan dengan nilai 100% dari nilai pokok obligasi dengan tingkat bunga tetap sebesar 8,25% per tahun dengan jangka waktu 3 (tiga) tahun sejak tanggal emisi. Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak tanggal emisi pada tanggal pembayaran bunga obligasi pertama kali yaitu tanggal 26 Desember 2025, sedangkan pembayaran bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo yaitu pada tanggal 26 September 2028.

Aktivitas Perdagangan Saham

Selama periode 2025, Bank Victoria tidak menerima sanksi dari regulator, termasuk sanksi berupa penghentian sementara atas perdagangan saham (*suspension*) maupun penghapusan pencatatan saham (*delisting*). Hal ini mencerminkan stabilitas dalam pengelolaan Bank serta kepatuhan terhadap regulasi yang berlaku.

2. **Bank Victoria Continuing Bonds IV Phase I Year 2025**

   The public offering of Bank Victoria Continuing Bonds IV Phase I Year 2025 was carried out in July 2025 with a principal value of Rp750,000,000,000. These bonds are offered at a value of 100.00% of the principal value of bonds with fixed rate of 9.00% per annum with a term of 3 (three) years since emission date. Interest of the bond paid every 3 (three) months starting from emission date, 4 October 2025, for the first payment whereas the last payment will be on 4 July 2028 at the maturity date of the bond.

3. **Bank Victoria Continuing Bonds IV Phase II Year 2025**

   The public offering of Bank Victoria Continuing Bonds IV Phase II Year 2025 was carried out in September 2025 with a principal value of Rp750,000,000,000. These bonds are offered at a value of 100% of the principal value of bonds with fixed rate of 8.25% per annum with a term of 3 (three) years since emission date. Interest of the bond paid every 3 (three) months starting from emission date, 26 December 2025, for the first payment whereas the last payment will be on 26 September 2028 at the maturity date of the bond.

Share Trading Activities

In the 2025 period, Bank Victoria did not receive any sanctions from regulators, including temporary suspension of share trading or delisting of its shares. This matter reflects the stability of the Bank's management and compliance with applicable regulations.

Ikhtisar Obligasi
Bonds Highlights

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Dates	Peringkat Ratings		Status Pembayaran Payment Status
					2025	2024	
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019-28 Juni 2026 28 June 2019-28 June 2026	idBBB (Triple B)	idBBB (Triple B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuous Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019-8 November 2026	idBBB (Triple B)	idBBB (Triple B)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuous Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020-1 April 2027	idBBB (Triple B)	idBBB (Triple B)	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri A Bank Victoria Series A Continuing Bonds III Phase I Year 2023 at fixed interest rate	300,000	3	9.25	9 Maret 2023-9 Maret 2026 9 March 2023-9 March 2026	idA- (Single A Minus)	idA- (Single A Minus)	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri B Bank Victoria Series B Continuing Bonds III Phase I Year 2023 at fixed interest rate	200,000	5	10.25	9 Maret 2023-9 Maret 2028 9 March 2023-9 March 2028	idA- (Single A Minus)	idA- (Single A Minus)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024	500,000	5	10.75	12 Juli 2024-12 Juli 2029 12 July 2024-12 July 2029	idBBB (Triple B)	idBBB (Triple B)	Belum Lunas Not Paid
Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 Bank Victoria Continuing Bonds III Phase II Year 2024	500,000	3	9.50	12 Juli 2024-12 Juli 2027 12 July 2024-12 July 2027	idA- (Single A Minus)	idA- (Single A Minus)	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025	500,000	5	10.00	18 Juni 2025-18 Juni 2030 18 June 2025-18 June 2030	idBBB (Triple B)	-	Belum Lunas Not Paid
Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 Bank Victoria Continuing Bonds IV Phase I Year 2025	750,000	3	9.00	4 Juli 2025-4 Juli 2028 4 July 2025-4 July 2028	idA- (Single A Minus)	-	Belum Lunas Not Paid
Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 Bank Victoria Continuing Bonds IV Phase II Year 2025	750,000	3	8.25	26 September 2025-26 September 2028	idA- (Single A Minus)	-	Belum Lunas Not Paid

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

Peristiwa Penting
Significant Events



16 Januari / January

Bank Victoria meraih penghargaan *The Best Indonesia Enterprises Risk Management Award - VII - 2025 Gold Award (B) Excellent* kategori *Public Company - Bank Asset >Rp25 T* oleh Economic Review.

Bank Victoria won the Best Indonesia Enterprises Risk Management Award - VII - 2025 Gold Award (B) Excellent in Public Company - Bank Assets >Rp25 Trillion category by Economic Review.



14 Februari / February

Bank Victoria meraih penghargaan *The Best Indonesia GCG Award IX 2025, Gold Award (B) Excellent* kategori *Public Company - Bank Asset >Rp25 T* dalam ajang *Indonesia Good Corporate Governance* (GCG) *Award 2025* oleh Economic Review.

Bank Victoria won The Best Indonesia GCG Award IX 2025, Gold Award (B) Excellent in Public Company - Bank Assets >Rp25 Trillion category at Indonesia Good Corporate Governance (GCG) Awards 2025 by Economic Review.

18 Februari / February

Bank Victoria meraih penghargaan *Indonesia Best Digital Awards 2025 in Conventional Bank for the Development of User-Friendly Mobile App and Business Process Automation* kategori *Conventional Bank* dalam ajang *Indonesia Digital Sustainability Awards 2025* oleh JAKTV.

Bank Victoria won the Indonesia Best Digital Awards 2025 in Conventional Bank for the Development of a User-Friendly Mobile App and Business Process Automation in Conventional Bank category at Indonesia Digital Sustainability Awards 2025 by JAKTV.





6 Maret / March

Bank Victoria melakukan penutupan KCP Tanah Abang Blok B dan melakukan pengalihan layanan perbankan di KCP Wisma Indocement yang beralamat di Wisma Indocement Lt. Dasar, Jl. Jenderal Sudirman Kav. 70-71, Kel. Setiabudi, Kec. Setiabudi, Jakarta Selatan 12970.

Bank Victoria closed its KCP Tanah Abang Blok B and transferred its banking services to KCP Wisma Indocement located on the Ground Fl. of Wisma Indocement, Jl. Jenderal Sudirman Kav. 70-71, Kel. Setibudi, Kec. Setibudi, Jakarta Selatan 12970.



6 Maret / March

Bank Victoria melakukan penutupan KCP Kelapa Gading Boulevard dan melakukan pengalihan layanan perbankan di KCP Kelapa Gading 1 yang beralamat di Jl. Taman Mandiri I No. 8 Kav. A1-B1, Kelapa Gading Timur, Jakarta Utara 14240.

Bank Victoria closed its KCP Kelapa Gading Boulevard and transferred its banking services to KCP Kelapa Gading 1 located on Jl. Taman Mandiri I No. 8 Kav. A1-B1, Kelapa Gading Timur, Jakarta Utara 14240.



6 Maret / March

Bank Victoria melakukan penutupan KCP Gading Serpong dan melakukan pengalihan layanan perbankan di KCP BSD yang beralamat di Bumi Serpong Damai Sektor IV Blok RE No. 52, Kel. Lengkong Wetan, Kec. Serpong, Tangerang 15318.

Bank Victoria closed its KCP Gading Serpong and transferred its banking services to KCP BSD located on Bumi Serpong Damai Sektor IV Blok RE No. 52, Kel. Lengkong Wetan, Kec. Serpong, Tangerang 15318.

20 Maret / March

Bank Victoria meraih penghargaan *The 2nd Best Conventional Bank KBMI 1 - Asset >Rp25 Trillion* dan penghargaan *The 2nd Best Saving Account Conventional* Bank *KBMI 1 - Asset >Rp25 Trillion* dalam ajang Infobank-Isentia *Digital Brand Awards* 2025 oleh Majalah Infobank dan Isentia.

Bank Victoria won The 2nd Best Conventional Bank KBMI 1 - Assets >Rp25 Trillion and The 2nd Best Savings Account Conventional Bank KBMI 1 - Assets >Rp25 Trillion at Infobank-Isentia Digital Brand Awards 2025 by Infobank Magazine and Isentia.





27 Mei / May

Bank Victoria meraih penghargaan *Top Bank 2025 in KBMI 1* dalam ajang *6th Indonesia Top Bank Awards* 2025 oleh The Iconomics.

Bank Victoria won the Top Bank 2025 award in KBMI 1 at the 6th Indonesia Top Bank Awards 2025 by The Iconomics.



18 Juni / June

Bank Victoria menerbitkan Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 sebesar Rp500.000.000.000,-.

Bank Victoria issued Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025 of Rp500,000,000,000.



19 Juni / June

Bank Victoria meraih penghargaan *The Most Innovative Future Finance Awards* 2025 *for Strengthening the Implementation of Business Sustainability and Strengthening Business Development and Expansion sector Conventional Bank - Private* dan penghargaan *The Best CEO in the Conventional Bank 2025 for Innovative Digital Services and Encouraging Strategic Collaboration Sector Conventional Bank - private* kepada Direktur Utama Bank Victoria Achmad Friscantono dalam ajang *Innovative Future Finance Awards* 2025 oleh Goodmoney.id & Plus Idea Komunika.

Bank Victoria won The Most Innovative Future Finance Awards 2025 for Strengthening the Implementation of Business Sustainability and Strengthening Business Development and Expansion in Conventional Bank - Private Sector, and The Best CEO in the Conventional Bank 2025 for Innovative Digital Services and Encouraging Strategic Collaboration Sector Conventional Bank - private, presented to Bank Victoria President Director, Achmad Friscantono, at the 2025 Innovative Future Finance Awards held by Goodmoney.id & Plus Idea Komunika.



20 Juni / June

Bank Victoria melaksanakan RUPS Tahunan 2025 dan *Public Expose* Tahunan 2025 di Graha BIP, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

Bank Victoria held its 2025 Annual GMS and 2025 Annual Public Expose at Graha BIP, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930.

4 Juli / July

Bank Victoria menerbitkan Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 sebesar Rp750.000.000.000,-.

Bank Victoria issued Bank Victoria Continuing Bonds IV Phase I Year 2025 of Rp750,000,000,000.



4 Juli / July

Dalam rangka memperluas jangkauan layanan perbankan khususnya di wilayah Bali, Bank Victoria secara resmi membuka kantor fungsional terbarunya yang berlokasi di Cross Vibe Paasha Atelier Kuta, Bali.

To expand its banking services reach, particularly in Bali region, Bank Victoria officially opened its newest functional office located at Cross Vibe Paasha Atelier Kuta, Bali.



9 Juli / July

Bank Victoria meraih penghargaan *Pioneers of the Indonesia Renewable Energy Certificate* dalam rangkaian acara HUT ke-16 *Indonesia Commodity & Derivatives Exchange* (ICDX) dan *Indonesia Clearing House* (ICH).

Bank Victoria won the Pioneers of the Indonesia Renewable Energy Certificate award in the 16th anniversary celebrations of Indonesia Commodity & Derivatives Exchange (ICDX) and Indonesia Clearing House (ICH).

15 Agustus / Agustus

Bank Victoria meraih penghargaan *The Best Indonesia IT & Digital Operational Excellence Award 2025 - GOLD Award (B) (Excellent)* kategori *Bank Public Company Asset* diatas Rp30 T dalam ajang *Indonesia Information Technology & Digital Operational Excellence Award (IITA) 2025* oleh Economic Review.

Bank Victoria won The Best Indonesia IT & Digital Operational Excellence Award 2025 - GOLD Award (B) (Excellent) in Bank Public Company category with Assets above Rp30 Trillion at Indonesia Information Technology & Digital Operational Excellence Award (IITA) 2025 by Economic Review.



26 September

Bank Victoria menerbitkan Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 sebesar Rp750.000.000.000,-.

Bank Victoria issued Bank Victoria Continuing Bonds IV Phase II Year 2025 amounting to Rp750,000,000,000.

8 Desember / December

Bank Victoria memperoleh nilai *Financial Intergrity Rating on Money Laundering/Terrorist Financing* (FIR on ML/TF) tahun 2025 sebesar 9.33 Predikat Sangat Baik. Hal ini menunjukkan tingkat komitmen Bank dalam mendukung Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) dan aparat penegak hukum untuk melakukan penelusuran transaksi keuangan terkait indikasi Tindak Pidana Pencucian Uang (TPPU), Tindak Pidana Pendanaan Terorisme (TPPT), dan Pendanaan Proliferasi Senjata Pemusnah Massal (PPSPM).

Bank Victoria obtained a Financial Integrity Rating on Money Laundering/Terrorist Financing (FIR on ML/TF) of 9.33 for 2025, representing Very Good Predicate. This demonstrates the Bank's commitment to supporting the Financial Transaction Reports and Analysis Center (PPATK) and law enforcement agencies in investigating financial transactions related to indications of Money Laundering Crimes (TPPU), Terrorist Financing Crimes (TPPT), and Proliferation of Weapons of Mass Destruction Financing (PPSPM).





16 Desember / December

Bank Victoria menyalurkan donasi sebesar Rp58.000.000,- untuk membantu meringankan korban terdampak bencana banjir dan longsor yang melanda wilayah Sumatera. Bantuan ini diserahkan melalui Yayasan Buddha Tzu Chi Indonesia sebagai mitra resmi dalam penyaluran bantuan kemanusiaan.

Bank Victoria made a donation Rp58,000,000 to help alleviate the impact of floods and landslides that hit Sumatra. This assistance was provided through the Indonesian Buddhist Tzu Chi Foundation as an official partner in distributing humanitarian aid.

23 Desember / December

Bank Victoria melaksanakan kegiatan bakti sosial di Desa Hamparan Perak, Kabupaten Deli Serdang, Sumatera Utara. Kegiatan ini ditujukan untuk membantu meringankan beban warga yang terdampak banjir dan longsong serta memberikan dukungan di tengah situasi darurat yang sedang dihadapi.

Bank Victoria conducted a community service activity in Hamparan Perak Village, Deli Serdang Regency, North Sumatra. This activity aimed to alleviate the burden on residents affected by floods and landslides and to provide support during the emergency situation being faced.



Penghargaan dan Sertifikasi
Awards and Certifications



The Best Indonesia Enterprises Risk Management Award - VII - 2025 Gold Award (B) Excellent

01

Kategori / Category
Public Company - Bank Asset >Rp25 T

Tanggal / Date
16 Januari 2025 / 16 January 2025

Acara / Event
The Best Indonesia Enterprises Risk managament Award VII 2025

Penyelenggara / Organizer
Economic Review

Penerima / Awardee
Bank Victoria



02

The Best Indonesia GCG Award IX 2025, Gold Award (B) Excellent,

Kategori / Category
Public Company - Bank Asset >Rp25 T

Tanggal / Date
14 Februari 2025 / 14 February 2025

Acara / Event
Indonesia Good Corporate Governance (GCG) Award 2025

Penyelenggara / Organizer
Economic Review

Penerima / Awardee
Bank Victoria



Indonesia Best Digital Awards 2025 in Conventional Bank for The Development of User-Friendly Mobile App and Business Process Automation

Kategori / Category
Conventional Bank

Tanggal / Date
18 Februari 2025 / 18 February 2025

Acara / Event
Indonesia Digital Sustainability Awards 2025

Penyelenggara / Organizer
JAKTV

Penerima / Awardee
Bank Victoria

03



04

The 2nd Best Conventional Bank KBMI 1 - Asset > Rp25 Trillion

Kategori / Category
Conventional Bank KBMI 1 – Asset > Rp25 T

Tanggal / Date
20 Maret 2025 / 20 March 2025

Acara / Event
Infobank-Isentia Digital Brand Awards 2025

Penyelenggara / Organizer
Majalah Infobank dan Isentia. /
Infobank Magazine and Isentia.

Penerima / Awardee
Bank Victoria



The 2nd Best Saving Account Conventional Bank KBMI 1 - Asset > Rp25 Trillion

05

Kategori / Category
Conventional Bank KBMI 1 – Asset > Rp25 T

Tanggal / Date
20 Maret 2025 / 20 March 2025

Acara / Event
Infobank-Isentia Digital Brand Awards 2025

Penyelenggara / Organizer
Majalah Infobank dan Isentia. / Infobank Magazine and Isentia.

Penerima / Awardee
Bank Victoria



06

Top Bank 2025 in KBMI 1

Kategori / Category
Bank KBMI 1

Tanggal / Date
27 Mei 2025 / 27 May 2025

Acara / Event
6th Indonesia Top Bank Awards 2025

Penyelenggara / Organizer
The Iconomics

Penerima / Awardee
Bank Victoria



The Most Innovative Future Finance Awards 2025 for Strengthening the Implementation of Business Sustainability and Strengthening Business Development and Expansion

07

Kategori / Category
Sector : Conventional Bank - Private

Tanggal / Date
19 Juni 2025 / 19 June 2025

Acara / Event
Innovative Future Finance Awards 2025

Penyelenggara / Organizer
Goodmoney.id & Plus Idea Komunika

Penerima / Awardee
Bank Victoria



The Best CEO in the Conventional Bank 2025 for Innovative Digital Services and Encouraging Strategic Collaboration

08

Kategori / Category
Sector : Conventional Bank - Private

Tanggal / Date
19 Juni 2025 / 19 June 2025

Acara / Event
Innovative Future Finance Awards 2025

Penyelenggara / Organizer
Goodmoney.id & Plus Idea Komunika

Penerima / Awardee
Direktur Utama Bank Victoria / President Director of Bank Victoria



09

Pioneers of the Indonesia Renewable Energy Certificate

Kategori / Category
-

Tanggal / Date
9 Juli 2025 / 9 July 2025

Acara / Event
HUT ke-16 *Indonesia Commodity & Derivatives Exchange* (ICDX) dan *Indonesia Clearing House* (ICH) / 16th Anniversary of Indonesia Commodity & Derivatives Exchange (ICDX) and Indonesia Clearing House (ICH)

Penyelenggara / Organizer
Indonesia Commodity & Derivatives Exchange (ICDX) dan / and Indonesia Clearing House (ICH)

Penerima / Awardee
Bank Victoria



The Best Indonesia IT & Digital Operational Excellence Award 2025 - GOLD Award (B) (Excellent)

10

Kategori / Category
Bank Public Company - Asset >Rp30 T / Bank Public Company - Assets >Rp30 Trillion

Tanggal / Date
15 Agustus 2025 / 15 August 2025

Acara / Event
Indonesia Information Technology & Digital Operational Excellence Award (IITA) 2025

Penyelenggara / Organizer
Economic Review

Penerima / Awardee
Bank Victoria



Laporan Manajemen
Management Report





02.

Laporan Dewan Komisaris

Report of the Board of Commissioners

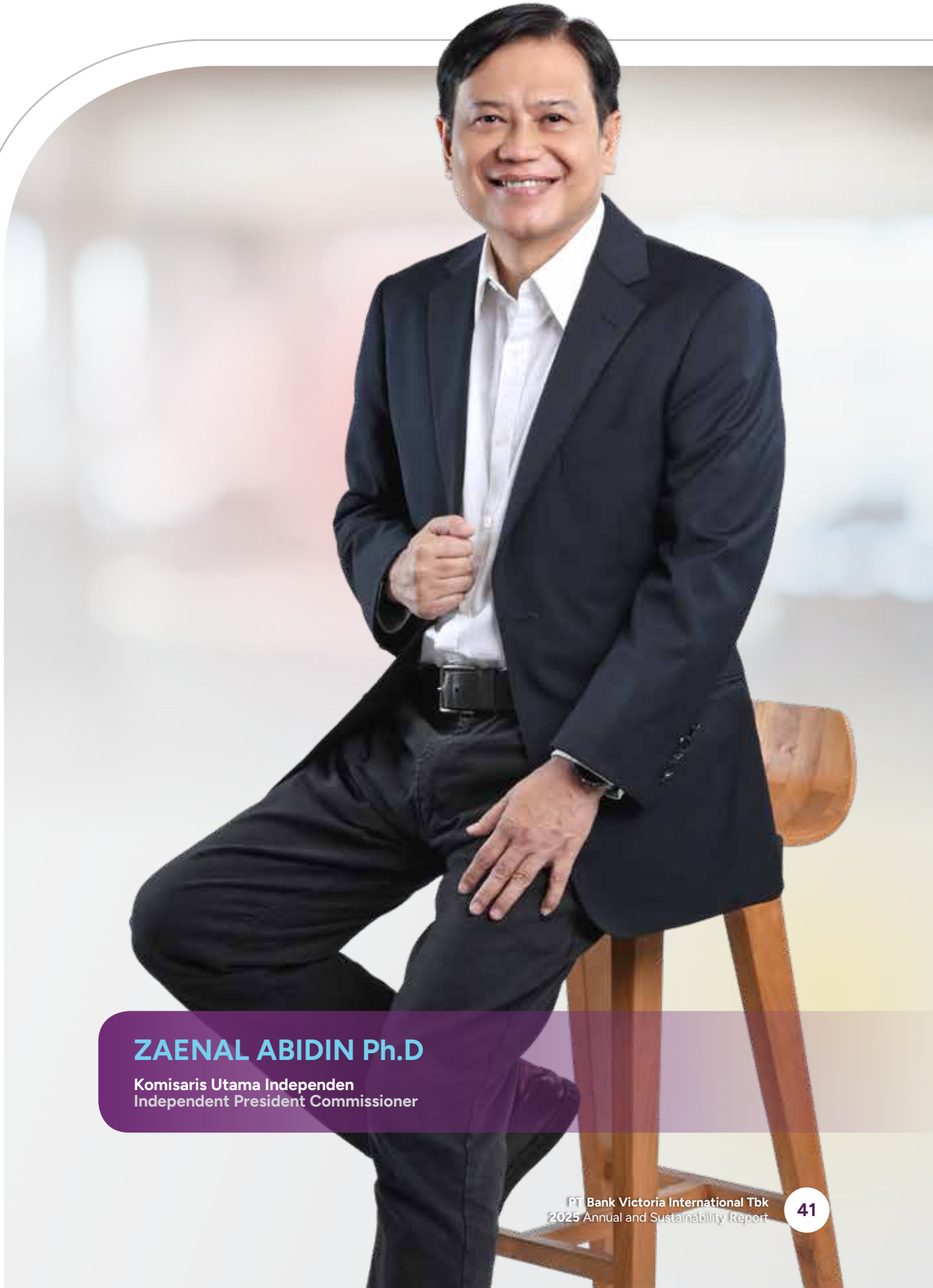
Pemegang Saham dan Pemangku Kepentingan yang Terhormat,
Dear Honorable Shareholders and Stakeholders,

Dewan Komisaris memanjatkan puji syukur atas capaian dan kinerja Bank Victoria sepanjang tahun 2025 yang tetap terjaga di tengah dinamika ekonomi dan industri yang penuh tantangan, ketepatan dalam pengambilan arah strategis, serta pengawasan yang konsisten agar pengelolaan Bank tetap berjalan sesuai dengan prinsip kehati-hatian, tata kelola yang baik, dan manajemen risiko yang memadai. Dalam konteks tersebut, Dewan Komisaris menjalankan fungsi pengawasan dan pemberian nasihat secara aktif melalui penelaahan atas kebijakan Direksi, evaluasi atas realisasi kinerja, serta pemantauan atas tindak lanjut berbagai agenda strategis Bank.

Berdasarkan hasil pengawasan yang dilakukan sepanjang tahun 2025, Dewan Komisaris memandang bahwa Direksi telah menjalankan pengelolaan Bank secara terarah dan responsif terhadap perkembangan lingkungan usaha. Arah kebijakan yang ditempuh telah mencerminkan upaya menjaga keseimbangan antara pertumbuhan usaha, kualitas aset, penguatan permodalan, serta peningkatan fondasi tata kelola dan keberlanjutan. Dewan Komisaris juga mencermati bahwa penguatan kualitas kinerja ke depan tetap perlu diarahkan pada peningkatan efisiensi, konsistensi implementasi kebijakan di seluruh lini, serta penyempurnaan proses pelaporan dan pengendalian internal agar pertumbuhan yang dicapai semakin berkualitas dan berkelanjutan.

The Board of Commissioners would like to express gratitude for Bank Victoria's achievements and performance throughout 2025, which were well-maintained amid the challenging economic and industrial dynamics, for the accuracy of its strategic direction, and for its consistent supervision to ensure that the Bank's management continued to adhere to the principles of prudence, good governance, and adequate risk management. In this regard, the Board of Commissioners actively carried out its supervisory and advisory functions by reviewing the Board of Directors' policies, evaluating performance realization, and monitoring the follow-up to the Bank's various strategic agenda.

Based on the results of supervision carried out throughout 2025, the Board of Commissioners believed that the Board of Directors managed the Bank in a focused and responsive manner in light of developments in business environment. The policy direction adopted reflected the efforts to maintain the balance across business growth, asset quality, capital strengthening, and elevated foundations of governance and sustainability. The Board of Commissioners also observed that, moving forward, strengthening performance quality still needed to be aimed at increasing efficiency, implementing consistent policy across all lines, and improving reporting and internal control processes to ensure higher-quality and sustainable growth.



ZAENAL ABIDIN Ph.D

Komisaris Utama Independen
Independent President Commissioner

Kondisi Makroekonomi dan Industri Perbankan Tahun 2025

Sepanjang tahun 2025, Dewan Komisaris mencermati bahwa lingkungan usaha Bank masih dihadapkan pada dinamika eksternal yang menuntut antisipasi seperti perlambatan pertumbuhan ekonomi global yang berlanjut, ketegangan geopolitik, volatilitas pasar keuangan, serta perubahan arah kebijakan moneter di berbagai negara menjadi faktor yang perlu diantisipasi karena berpotensi memengaruhi stabilitas likuiditas, kualitas aset, dan sentimen dunia usaha. Dalam konteks tersebut, Dewan Komisaris memandang bahwa pengelolaan Bank sepanjang tahun buku tetap diarahkan pada prinsip kehati-hatian, penguatan fondasi permodalan, serta konsistensi dalam menjaga keseimbangan antara pertumbuhan dan kualitas kinerja.

Di tingkat nasional, Dewan Komisaris mengamati bahwa ketahanan perekonomian Indonesia dan solidnya kinerja industri perbankan memberikan ruang yang cukup bagi Bank untuk menjaga keberlangsungan usaha. Meskipun likuiditas industri secara umum tetap memadai dan fungsi intermediasi nasional masih bertumbuh, Dewan Komisaris juga mencermati bahwa kondisi tersebut belum berlangsung merata pada seluruh kelompok bank, termasuk masih adanya tekanan pada segmen bank dengan skala permodalan yang lebih terbatas. Oleh karena itu, Dewan Komisaris secara konsisten menekankan agar Direksi tetap menjalankan strategi usaha secara selektif, menjaga disiplin manajemen risiko, memperkuat struktur pendanaan, serta mengutamakan kualitas aset dan efisiensi operasional agar Bank mampu merespons persaingan industri secara lebih adaptif dan berkelanjutan.

Pengawasan terhadap Perumusan dan Implementasi Strategi Bank Victoria

Dewan Komisaris menjalankan fungsi pengawasan secara aktif terhadap proses perumusan strategi dan kebijakan yang disusun oleh Direksi, dengan memastikan keselarasan antara arah pengembangan usaha, profil risiko, kondisi industri, serta visi jangka panjang Bank. Pengawasan tersebut dilakukan melalui penelaahan atas Rencana Bisnis Bank (RBB) dan Rencana Aksi Keuangan Berkelanjutan (RAKB), termasuk arah transformasi digital serta agenda keuangan berkelanjutan, disertai pemberian arahan dan masukan konstruktif agar setiap kebijakan yang ditetapkan tetap berada dalam koridor kehati-hatian, kepatuhan, dan keberlanjutan. Sebagai bagian dari pelaksanaan fungsi tersebut, Dewan Komisaris juga meninjau strategi Bank secara berkala serta menyusun Laporan Pengawasan RBB yang disampaikan kepada otoritas berwenang setiap semester.

Macroeconomic Conditions and Banking Industry in 2025

Throughout 2025, the Board of Commissioners observed that the Bank's business environment continued to face external dynamics requiring anticipation, including the continued slowdown in global economic growth, geopolitical tensions, financial market volatility, and changes in monetary policy direction in various countries—all of which were factors that must be anticipated as they coud potentially impact liquidity stability, asset quality, and business sentiment. In this regard, the Board of Commissioners believed that the Bank's management throughout the fiscal year remained oriented toward prudential principles, strengthening capital foundation, and consistently maintaining a balance between growth and performance quality.

At the national level, the Board of Commissioners observed that Indonesia's economic resilience and banking industry's solid performance provided sufficient room for the Bank to maintain business continuity. Despite the generally adequate liquidity in the industry and the continued growth of the national intermediation function, the Board of Commissioners also observed that such conditions were not evenly distributed across all banking groups, including ongoing pressure on banking segments with more limited capital. For this reason, the Board of Commissioners consistently emphasized that the Board of Directors must continue to implement selective business strategy, maintain disciplined risk management, strengthen funding structure, and prioritize asset quality and operational efficiency so that the Bank can respond to industry competition more adaptively and sustainably.

Supervision of Bank Victoria's Strategy Formulation and Implementation

The Board of Commissioners actively supervises the strategy and policy formulation process developed by the Board of Directors, ensuring alignment between business development direction, risk profile, industry conditions, and the Bank's long-term vision. Such supervision is conducted through a review of the Bank's Business Plan (RBB) and Sustainable Finance Action Plan (RAKB), including the direction of digital transformation and sustainable finance agenda, accompanied by the provision of constructive direction and input to ensure each policy remains within the framework of prudence, compliance, and sustainability. As part of its function implementation, the Board of Commissioners also periodically reviews the Bank's strategy and prepares the RBB Supervision Report, which is submitted to the relevant authorities each semester.

Dalam pelaksanaannya, pengawasan dilakukan secara berkesinambungan melalui forum rapat internal Dewan Komisaris maupun rapat gabungan dengan Direksi. Agenda yang dibahas mencakup antara lain laporan Direktur Kepatuhan, laporan tingkat kesehatan Bank, laporan keuangan dan pengendalian internal, roadmap digital Bank Victoria, evaluasi kinerja berkala, hingga pembahasan RBB 2026–2028. Intensitas dan substansi pembahasan tersebut menunjukkan bahwa fungsi pengawasan tidak hanya dilakukan secara formal, melainkan diarahkan untuk memastikan implementasi strategi berjalan konsisten, terukur, dan responsif terhadap perubahan kondisi usaha.

In the implementation, supervision is conducted continuously through internal meetings of the Board of Commissioners and joint meetings with the Board of Directors. Discussions on the agenda include the Director of Compliance's report, the Bank's sound level report, financial statements and internal control reports, Bank Victoria's digital roadmap, periodic performance evaluations, and discussions on the 2026–2028 RBB. The intensity and substance of these discussions demonstrate that the supervisory function is not merely formal but is aimed at ensuring that strategy implementation is consistent, measurable, and responsive to changing business conditions.

Penilaian terhadap Kinerja Direksi mengenai Pengelolaan Bank Victoria

Dewan Komisaris menilai bahwa Direksi telah menjalankan fungsi pengelolaan Bank sepanjang tahun 2025 dengan mengedepankan prinsip kehati-hatian, akuntabilitas, dan orientasi keberlanjutan. Penilaian tersebut didasarkan pada evaluasi atas kepemimpinan, kerja sama, komunikasi, implementasi GCG, pencapaian RBB, serta tindak lanjut Direksi atas rekomendasi audit internal, auditor eksternal, dan hasil pengawasan regulator. Berdasarkan penilaian tersebut, hasil evaluasi kinerja Direksi oleh Dewan Komisaris untuk tahun 2025 tingkat kesehatan Bank memperoleh nilai komposit 2 dengan kategori Baik, yang menunjukkan bahwa Direksi telah menjalankan tugas dan tanggung jawabnya secara memadai dalam mengelola Bank di tengah tantangan usaha yang dinamis.

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

The Board of Commissioners considered that the Board of Directors carried out its management functions throughout 2025 by prioritizing the principles of prudence, accountability, and sustainability orientation. This assessment was based on the evaluations of leadership, cooperation, communication, GCG implementation, achievement of the Bank's RBB, and the Board of Directors' follow-up on recommendations from internal audits, external auditors, and regulatory supervision results. Based on this assessment, the Board of Commissioners' performance evaluation of the Board of Directors for 2025 assigned the Bank a composite score of 2 under the category of Good, indicating that the Board of Directors adequately carried out its duties and responsibilities in managing the Bank amidst dynamic business challenges.

Dari sisi kinerja usaha, Dewan Komisaris mencermati adanya perkembangan yang positif pada sejumlah indikator utama. Peningkatan pendapatan bunga sebesar 10,89%, yang didukung oleh kenaikan pendapatan operasional lainnya sebesar 45,81%, berkontribusi terhadap pertumbuhan laba tahun berjalan sebesar 11,78%. Dari sisi posisi keuangan, pertumbuhan aset sebesar 16,61% diikuti oleh peningkatan liabilitas dan ekuitas, serta didukung oleh pertumbuhan penyaluran kredit yang mencerminkan fungsi intermediasi yang tetap terjaga. Perkembangan tersebut menunjukkan bahwa strategi pengelolaan bisnis yang ditempuh Direksi mampu menopang pertumbuhan usaha di tengah tekanan kompetisi dan perubahan lingkungan industri.

In terms of business performance, the Board of Commissioners recorded positive developments in several key indicators. A 10.89% increase in interest income, driven by the increase in other operating income of 45.81%, contributed to the 11.78% growth in profit for the year. In terms of financial position, asset growth of 16.61% was followed by the increase in liabilities and equity, and driven by the growth in lending, reflecting a maintained intermediation function. This development demonstrated that the Board of Directors' business management strategy was capable of supporting business growth amid competitive pressures and changes in the industry environment.

Pada saat yang sama, perhatian terhadap kualitas aset dan pengelolaan risiko juga terlihat melalui perbaikan rasio *Non-Performing Loan* (NPL) menjadi 2,49% secara bruto dan 1,73% secara neto, serta peningkatan rasio KPMM untuk risiko kredit, operasional, dan pasar menjadi 23,84%. Walaupun demikian, Dewan Komisaris tetap mencermati adanya ruang perbaikan pada beberapa indikator efisiensi

At the same time, attention to asset quality and risk management was also evident in the improvement of Non-Performing Loan (NPL) ratio to 2.49% on a gross basis and 1.73% on a net basis, as well as the increase in CAR for credit, operational, and market risks to 23.84%. Nevertheless, the Board of Commissioners continues to monitor room for improvement in several efficiency and profitability

dan profitabilitas, termasuk penguatan margin dan efektivitas pengelolaan biaya, agar kualitas pertumbuhan ke depan semakin solid dan tidak hanya bertumpu pada ekspansi volume usaha.

indicators, including strengthening margins and effective cost management, so that the growth in the future remains solid and is not solely reliant on business volume expansion.

Pandangan atas Prospek Usaha

Prospek usaha Bank Victoria untuk tahun 2026 sebagaimana disusun oleh Direksi dinilai telah mempertimbangkan dinamika eksternal secara komprehensif, baik pada tingkat global maupun domestik. Proyeksi perlambatan pertumbuhan ekonomi global ke kisaran 3,2% di tengah meningkatnya ketidakpastian geopolitik menjadi faktor yang perlu terus diantisipasi. Sementara perekonomian nasional yang diperkirakan tumbuh pada kisaran 4,9%-5,7% dengan inflasi yang terjaga memberikan landasan yang cukup kuat. Dalam konteks tersebut, pandangan terhadap industri perbankan yang tetap prospektif, didukung oleh pertumbuhan kredit pada kisaran 8%-12% serta permintaan pembiayaan yang terjaga, mencerminkan keseimbangan antara peluang pertumbuhan dan kewaspadaan terhadap risiko.

Views on Business Outlook

Bank Victoria's business outlook for 2026, as prepared by the Board of Directors, is deemed to have comprehensively considered external dynamics, both at the global and domestic levels. The projected slowdown in global economic growth to around 3.2% amid the rising geopolitical uncertainty serves as a factor that needs to be continuously anticipated. Meanwhile, the national economy, projected to grow in the range of 4.9%-5.7% with controlled inflation, provides a strong foundation. In this regard, banking industry's outlook remains promising, supported by loan growth in the range of 8%-12% and maintained financing demand, reflecting a balance between growth opportunities and risk awareness.

Sejalan dengan itu, strategi dan target usaha yang ditetapkan untuk tahun 2026 sebagaimana dalam rencana bisnis Bank, dinilai telah disusun secara terukur dan realistis, dengan tetap mengedepankan prinsip kehati-hatian. Target pertumbuhan DPK, kredit, dan aset yang moderat menunjukkan pendekatan yang lebih menekankan kualitas pertumbuhan daripada sekadar ekspansi yang agresif. Upaya menjaga kecukupan modal pada level yang kuat, mempertahankan margin bunga bersih, serta meningkatkan kualitas aset melalui penurunan rasio NPL neto menunjukkan fokus pada penguatan fundamental bisnis. Inisiatif penguatan struktur pendanaan, pengembangan jaringan secara selektif, serta percepatan transformasi transaksi dengan digital juga dipandang relevan dalam meningkatkan daya saing dan mendukung keberlanjutan kinerja Bank di tengah dinamika industri.

Correspondingly, business strategies and targets set for 2026, as outlined in the Bank's business plan, are considered measurable and realistic, while maintaining a prudent approach. Moderate growth targets for DPK, loans, and assets demonstrate an approach that emphasizes quality growth over merely aggressive expansion. Efforts to maintain strong capital adequacy, maintain net interest margins, and improve asset quality by reducing the net NPL ratio demonstrate the focus on strengthening business fundamentals. Initiatives to strengthen funding structure, develop network selectively, and accelerate the transformation of transactions to digital are also considered relevant in enhancing competitiveness and supporting the Bank's sustainable performance amid the industry dynamics.

Pandangan atas Penerapan Tata Kelola Perusahaan yang Baik

Penerapan tata kelola perusahaan di Bank Victoria dipandang telah berjalan dengan mengacu pada kerangka yang terstruktur dan selaras dengan ketentuan regulator serta praktik terbaik yang berlaku. Hal ini tercermin dari adanya kerangka tata kelola yang dirancang sesuai dengan karakteristik operasional dan nilai inti Bank, sehingga mampu mendukung proses pengambilan keputusan yang lebih akuntabel dan transparan. Penerapan prinsip-prinsip tata kelola tersebut juga terlihat telah terintegrasi dalam berbagai kebijakan dan prosedur internal, serta menjadi

Views on the Implementation of Good Corporate Governance

The corporate governance implementation at Bank Victoria is considered in accordance with a structured framework aligned with regulatory requirements and applicable best practices. This is reflected in the governance framework designed in accordance with the Bank's operational characteristics and core values, thus supporting a more accountable and transparent decision-making process. The implementation of these governance principles is also integrated into various internal policies and procedures, serving as the foundation for consistent conduct of business

landasan dalam menjalankan aktivitas usaha secara konsisten. Dalam hal ini, Dewan Komisaris menilai bahwa implementasi tata kelola telah dilaksanakan dengan baik dan memberikan kontribusi positif terhadap penguatan kinerja serta peningkatan kepercayaan para pemangku kepentingan.

Dalam aspek implementasi, mekanisme pengawasan dan evaluasi yang dilakukan secara berkala dinilai telah memberikan dasar yang memadai dalam menjaga efektivitas penerapan tata kelola Bank. Penilaian melalui *self-assessment* mencerminkan adanya sistem evaluasi yang komprehensif, sekaligus menjadi sarana untuk melakukan perbaikan secara berkelanjutan. Meskipun demikian, Dewan Komisaris memandang bahwa upaya penyempurnaan tetap perlu dilakukan, khususnya dalam memperkuat konsistensi implementasi di seluruh lini organisasi serta meningkatkan efektivitas pengendalian internal. Selain itu, integrasi antara tata kelola dan pengelolaan risiko keberlanjutan menunjukkan adanya keselarasan dengan arah pengembangan usaha yang berorientasi masa depan. Pendekatan ini dinilai mampu terus memperkuat kualitas pengelolaan Bank secara menyeluruh.

Pandangan atas Penerapan Tanggung Jawab Sosial dan Lingkungan

Pelaksanaan tanggung jawab sosial dan lingkungan di lingkungan operasional Bank Victoria dinilai telah menunjukkan arah yang semakin terintegrasi dengan pengembangan usaha. Inisiatif yang dijalankan tidak lagi semata bersifat kepatuhan, melainkan mulai dikaitkan dengan kerangka kebijakan strategis. Hal ini tercermin dari penguatan pemahaman internal terkait aspek lingkungan, sosial, dan tata kelola (*Environmental, Social, and Governance*/ESG) serta pemanfaatan Rencana Aksi Keuangan Berkelanjutan (RAKB) sebagai pedoman dalam menentukan prioritas kegiatan. Pendekatan tersebut memberikan landasan yang lebih terarah dalam memastikan bahwa prinsip keberlanjutan diimplementasikan secara selaras dengan kebutuhan bisnis.

Integrasi aspek keberlanjutan ke dalam kerangka manajemen risiko juga mencerminkan adanya peningkatan perhatian terhadap potensi risiko yang bersumber dari faktor ekonomi, sosial, dan lingkungan. Di sisi lain, keterlibatan berbagai unit kerja dalam mendukung implementasi kebijakan menunjukkan bahwa proses internalisasi telah mulai berjalan pada tingkat operasional. Meskipun demikian, penguatan pada aspek konsistensi pelaksanaan dan kedalaman evaluasi masih menjadi area yang perlu terus ditingkatkan, agar manfaat yang dihasilkan tidak hanya bersifat administratif, tetapi juga memberikan nilai tambah yang lebih nyata bagi pemangku kepentingan.

operations. In this matter, the Board of Commissioners considers that the good corporate governance has been implemented properly and has made positive contribution to strengthening performance and enhancing stakeholder trust.

In terms of implementation, the periodic monitoring and evaluation mechanisms are considered to have provided an adequate basis for maintaining the effectiveness of the Bank's corporate governance implementation. The self-assessment reflects the existence of a comprehensive evaluation system and serves as a means for continuous improvement. Nevertheless, the Board of Commissioners believes that further improvements are necessary, particularly in strengthening implementation consistency across the organization and enhancing the effectiveness of internal controls. Furthermore, the integration of corporate governance and sustainability risk management demonstrates the alignment with future-oriented direction of business development. This approach is considered capable of continuously strengthening the quality of the Bank's overall management.

Views on the Implementation of Social and Environmental Responsibility

The implementation of social and environmental responsibility within Bank Victoria's operations is considered to have shown a trend of increasing integration with business development. Initiatives undertaken are no longer solely for compliance purposes but are currently linked to the strategic policy framework. This is reflected in the strengthening of internal understanding of Environmental, Social, and Governance (ESG) aspects and the utilization of Sustainable Finance Action Plan (RAKB) as the guideline for determining activity priorities. This approach provides a more focused foundation for ensuring that sustainability principles are implemented in alignment with business needs.

The integration of sustainability aspects into risk management framework also reflects increased attention to potential risks stemming from economic, social, and environmental factors. Furthermore, the involvement of various work units in supporting policy implementation indicates that the internalization process has begun at the operational level. Nevertheless, strengthening the consistency of implementation and the depth of evaluation remain areas that require continued improvement, so that the resulting benefits are not merely administrative but also provide more tangible added value for stakeholders.

Perubahan Komposisi Anggota Dewan Komisaris

Sepanjang tahun 2025, tidak terdapat perubahan terkait komposisi anggota Dewan Komisaris Bank Victoria. Komposisi Dewan Komisaris yang menjabat hingga saat ini meliputi:

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

Changes in the Board of Commissioners' Composition

Throughout 2025, there were no changes to the composition of the Board of Commissioners of Bank Victoria. The current composition of the Board of Commissioners includes:

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

Penutup

Dewan Komisaris menyampaikan penghargaan kepada seluruh pihak yang telah berkontribusi dalam mendukung kinerja Bank Victoria sepanjang tahun 2025, baik Direksi, karyawan, Pemegang Saham, mitra usaha, nasabah, maupun pemangku kepentingan lainnya. Keterpaduan peran, komitmen terhadap penerapan tata kelola yang baik, serta kemampuan dalam merespons dinamika industri menjadi faktor penting dalam menjaga keberlangsungan usaha Bank. Dewan Komisaris akan terus melaksanakan fungsi pengawasan dan pemberian nasihat secara konsisten guna memastikan arah pengelolaan Bank tetap berada dalam koridor strategis yang tepat. Dengan dukungan kolaborasi dan koordinasi yang berkesinambungan serta penguatan kapabilitas usaha, Bank diharapkan mampu mempertahankan kinerja yang stabil sekaligus memberikan nilai tambah yang berkelanjutan bagi seluruh pemangku kepentingan.

Closing

The Board of Commissioners would like to express its appreciation to all parties who contributed to supporting Bank Victoria's performance throughout 2025, including the Board of Directors, employees, shareholders, business partners, customers, and other stakeholders. Integration of roles, commitment to implementing good governance, and ability to respond to industry dynamics are crucial factors in maintaining the Bank's business continuity. The Board of Commissioners will continue to consistently carry out its supervisory and advisory functions to ensure that the Bank's management direction remains within the appropriate strategic corridor. With the support of continuous collaboration and coordination, as well as strengthening business capabilities, the Bank is expected to maintain stable performance while providing sustainable added value to all stakeholders.

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



Zaenal Abidin Ph.D
Komisaris Utama Independen
Independent President Commissioner

Dewan Komisaris
Board of Commissioners



2

Gunawan Tenggarahardja
Komisaris Independen
Independent Commissioner

3

Sia Leng Ho
Komisaris
Commissioner

1

Zaenal Abidin Ph.D
Komisaris Utama Independen
Independent President Commissioner

Laporan Direksi [POJK D.1]

Report of the Board of Directors

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

Tahun 2025 menjadi periode yang menuntut ketahanan, ketepatan strategi, dan kemampuan adaptasi yang semakin tinggi di tengah dinamika ekonomi global yang masih dibayangi ketidakpastian. Dalam kondisi tersebut, Bank Victoria menjalankan arah pengelolaan usaha secara terukur dengan tetap mengedepankan prinsip kehati-hatian, penguatan fundamental bisnis, serta peningkatan kualitas layanan. Melalui langkah-langkah strategis yang dijalankan secara konsisten, Bank berupaya menjaga kesinambungan kinerja sekaligus memperkuat daya saing dalam merespons perubahan lanskap industri perbankan yang semakin dinamis.

The year 2025 became a period that demanded increased resilience, strategic accuracy, and adaptability amid the global economic dynamics still shrouded in uncertainty. Under these conditions, Bank Victoria implemented a measured business management direction while prioritizing prudential principle, strengthening business fundamentals, and improving service quality. Through the consistently implemented strategic steps, the Bank strove to maintain its performance continuity while strengthening competitiveness in responding to the increasingly dynamic landscape of banking industry.

Di tengah berbagai tantangan yang dihadapi, Bank Victoria mampu mencatatkan perkembangan kinerja yang positif. Pertumbuhan aset, peningkatan penyaluran kredit, perbaikan kualitas aset, penguatan permodalan, serta kenaikan laba bersih menunjukkan bahwa strategi yang diterapkan sepanjang tahun berjalan pada arah yang tepat. Kinerja tersebut juga mencerminkan keterpaduan antara kebijakan manajemen, disiplin pengelolaan risiko, dukungan tata kelola yang kuat, serta kontribusi seluruh pemangku kepentingan dalam menjaga keberlangsungan pertumbuhan usaha Bank.

Amidst the various challenges faced, Bank Victoria was able to record positive performance developments. Asset growth, increased lending, improved asset quality, strengthened capital, and increased net profit demonstrated that the strategies implemented throughout the year were on the right track. This performance also reflected the integration of management policies, disciplined risk management, strong governance support, and all stakeholders' contribution in maintaining the Bank's sustainable business growth.

Tantangan Ekonomi dan Industri Perbankan Tahun 2025

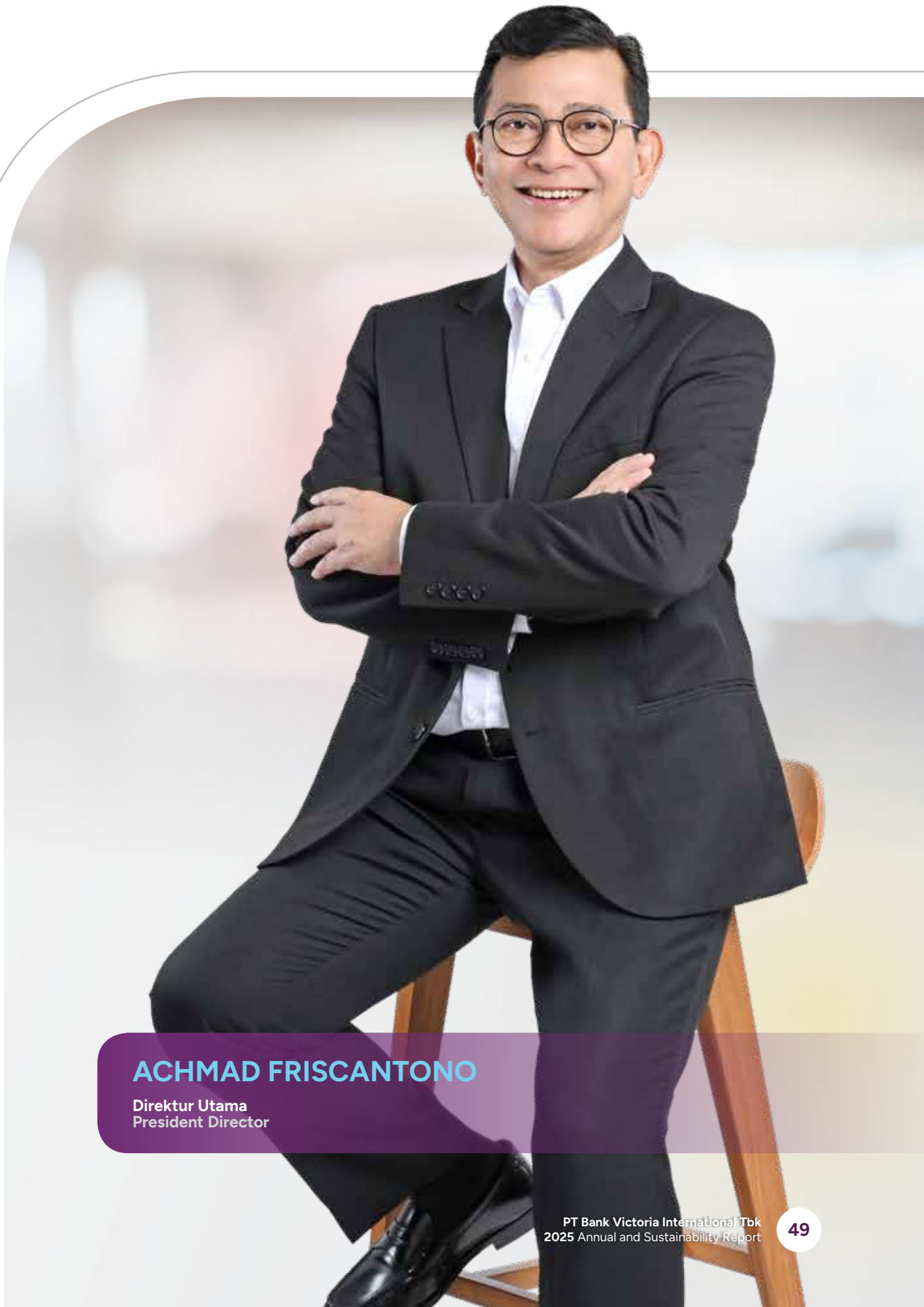
Sepanjang tahun 2025, perekonomian global masih diwarnai oleh ketegangan geopolitik, fragmentasi perdagangan, dan meningkatnya ketidakpastian pasar keuangan. Konflik Rusia–Ukraina yang belum mereda, eskalasi di Timur Tengah, serta kebijakan tarif dan proteksionisme Amerika Serikat menambah tekanan terhadap perdagangan internasional, rantai pasok, dan sentimen pelaku usaha. Kondisi tersebut mendorong perlambatan pertumbuhan ekonomi global menjadi 3,3% serta menahan laju penurunan inflasi global.

Di tengah situasi global tersebut, perekonomian Indonesia tetap menunjukkan resiliensi yang baik. Pertumbuhan ekonomi nasional tercatat sebesar 5,39% dengan inflasi yang terjaga pada level 2,92%, didukung oleh kuatnya permintaan domestik, pertumbuhan investasi, kinerja

Economic Challenges and Banking Industry in 2025

Throughout 2025, the global economy was still filled with geopolitical tensions, trade fragmentation, and increasing financial market uncertainty. The ongoing Russia-Ukraine conflict, escalation in the Middle East, as well as US tariff and protectionist policies added pressures to the international trade, supply chains, and business sentiment. Such conditions slowed global economic growth to 3.3% and held back the decline in global inflation.

Amidst these global conditions, Indonesia's economy continued to demonstrate good resilience. The national economic growth was recorded at 5.39%, with inflation maintained at 2.92%, driven by strong domestic demand, investment growth, solid export performance, and



ACHMAD FRISCANTONO

Direktur Utama
President Director

ekspor yang tetap solid, serta akselerasi digitalisasi sistem pembayaran. Fundamental ekonomi nasional yang relatif kuat ini menjadi penopang penting bagi keberlangsungan aktivitas usaha dan permintaan pembiayaan di sektor perbankan.

Dari sisi industri, perbankan nasional pada tahun 2025 tetap menunjukkan kinerja yang solid dengan pertumbuhan kredit sebesar 9,46% dan Dana Pihak Ketiga sebesar 13,83%. Likuiditas industri juga tetap memadai, ditopang oleh rasio Alat Likuid terhadap Dana Pihak Ketiga (AL/DPK) maupun terhadap *Non-Core Deposit* (AL/NCD), serta *Liquidity Coverage Ratio* (LCR) yang berada pada level kuat. Namun demikian, pertumbuhan industri belum berlangsung merata pada seluruh kelompok bank. Tekanan masih terasa pada segmen Kelompok Bank berdasarkan Modal Inti (KBMI) 1, yang mencatatkan penurunan aset sebesar 9,55%, DPK sebesar 4,55%. dan kredit sebesar 6,56%. Kondisi ini menunjukkan bahwa meskipun likuiditas industri secara umum tetap kuat, persaingan dalam penghimpunan dana dan penyaluran kredit pada kelompok bank masih berlangsung ketat, sehingga mendorong pengelolaan likuiditas dan ekspansi pembiayaan yang lebih selektif serta berorientasi pada kualitas.

Kebijakan dan Strategi Keberlanjutan yang Ditempuh Bank Victoria

Dalam menghadapi dinamika industri yang semakin kompleks, Bank Victoria terus memperkuat komitmen terhadap penerapan keuangan berkelanjutan melalui kebijakan dan strategi yang terintegrasi dalam pengembangan bisnis. Pendekatan ini tidak hanya berfokus pada pencapaian kinerja jangka pendek, tetapi juga diarahkan untuk menciptakan pertumbuhan yang sehat, berkualitas, dan berkesinambungan. Hal tersebut diwujudkan melalui penerapan prinsip kehati-hatian (*prudential banking*), penguatan aspek manajemen risiko, serta pengembangan portofolio bisnis yang memperhatikan aspek lingkungan, sosial, dan tata kelola (*Environmental, Social, and Governance*/ESG), sebagaimana tertuang dalam Rencana Bisnis Bank (RBB) dan Rencana Aksi Keuangan Berkelanjutan (RAKB).

Sepanjang tahun 2025, fokus utama strategi pengembangan bisnis Bank Victoria diarahkan pada 3 pilar utama, yaitu penguatan fungsi intermediasi melalui penyaluran kredit yang berkualitas, optimalisasi struktur pendanaan, serta percepatan transformasi digital. Di bidang perkreditan, strategi dijalankan secara selektif dan konservatif dengan proyeksi pertumbuhan yang terukur, disertai peningkatan kualitas aset melalui penguatan sistem *monitoring* debitur, *early warning system*, serta pengembangan kapabilitas sumber daya manusia. Upaya ini turut didukung oleh pengembangan ekosistem *digital lending* dan pengembangan penerusan kredit melalui

accelerated payment system digitalization. These relatively strong national economic fundamentals served as an important support for the sustainability of business activities and demand for financing in banking sector.

In terms of industry, the national banking sector in 2025 continued to demonstrate solid performance, with loan growth of 9.46% and Third-Party Funds of 13.83%. The Industry's liquidity also remained adequate, driven by strong ratios of Liquid Assets to Third-Party Funds (AL/DPK) and Non-Core Deposits (AL/NCD), as well as Liquidity Coverage Ratio (LCR). Nevertheless, the industry's growth was not evenly distributed across all banking groups. Pressures were still felt in the Bank Group based on Core Capital (KBMI) 1 segment, which recorded a decline in assets of 9.55%, DPK of 4.55%, and loans of 6.56%. These conditions indicated that while industry's liquidity remained generally strong, competition for funding and lending within banking groups remained intense, encouraging more selective and quality-oriented liquidity management and financing expansion.

Policies and Sustainability Strategies Taken by Bank Victoria

In facing the increasingly complex industry dynamics, Bank Victoria constantly strengthens its commitment to implementing sustainable finance through policies and strategies integrated into business development. This approach focuses not only on achieving short-term performance but also on creating sound, quality, and sustainable growth. This is realized through the application of prudential banking principles, strengthening of risk management aspects, and development in business portfolio with due observance of Environmental, Social, and Governance (ESG) aspects, as stated in the Bank's Business Plan (RBB) and Sustainable Finance Action Plan (RAKB).

Throughout 2025, Bank Victoria's business development strategy focused on 3 main pillars, namely strengthening intermediation function through quality lending, optimizing funding structure, and accelerating digital transformation. In credit sector, the strategy was implemented selectively and conservatively, with measured growth projections, accompanied by improvements in asset quality through strengthening of debtor monitoring systems, early warning systems, and development of human capital capabilities. These efforts were supported by the development of digital lending ecosystem and the development of loan distribution through channeling

skema *channeling* dengan berbagai mitra strategis, guna memperluas akses pembiayaan sekaligus meningkatkan efisiensi proses. Sejalan dengan itu, pada sisi pendanaan dan layanan, Bank terus mendorong pertumbuhan dana secara optimal dengan tetap menjaga biaya dana, memperkuat loyalitas nasabah, serta mengembangkan produk dan layanan berbasis digital, termasuk melalui peningkatan kapabilitas *mobile* dan *internet banking* serta pengembangan *digital operations*.

Selanjutnya, pada aspek operasional dan teknologi informasi, strategi difokuskan pada penguatan infrastruktur digital, peningkatan kualitas layanan, serta optimalisasi efisiensi operasional secara berkelanjutan. Transformasi digital terus didorong melalui pengembangan *digital banking*, pemanfaatan data analytics, serta peningkatan keamanan dan kepatuhan sistem teknologi informasi. Di sisi pemasaran, Bank Victoria secara aktif mengembangkan inovasi produk dan layanan, serta memperluas jangkauan pasar melalui optimalisasi jaringan kantor dan pengembangan transaksi digital. Upaya tersebut juga diiringi dengan peningkatan literasi dan inklusi keuangan, termasuk dalam mendukung implementasi keuangan berkelanjutan. Melalui langkah ini, Bank memperkuat keterlibatan nasabah sekaligus memperluas basis pertumbuhan usaha.

Peranan Direksi dalam Perumusan dan Implementasi Strategi Keberlanjutan

Perumusan strategi dan kebijakan strategis Bank dilaksanakan melalui peran aktif manajemen dalam memastikan keselarasan antara visi jangka panjang, profil risiko, serta dinamika industri yang terus berkembang. Penyusunan strategi dilakukan secara komprehensif melalui analisis kondisi makroekonomi, tren industri perbankan, perubahan regulasi yang relevan dengan kegiatan usaha Bank, serta evaluasi kinerja internal guna menghasilkan kebijakan yang terukur, adaptif, dan sejalan dengan prinsip keberlanjutan. Dalam kerangka tersebut, RAKB menjadi acuan dalam penetapan prioritas bisnis, pengelolaan risiko, serta penguatan struktur permodalan dan likuiditas, dengan tetap menjaga keseimbangan antara pertumbuhan dan prinsip kehati-hatian.

Dalam memastikan implementasi strategi berjalan efektif, dilakukan penguatan mekanisme pengendalian dan pengawasan melalui penetapan indikator kinerja utama (*Key Performance Indicators* atau KPI) yang terukur di seluruh lini organisasi, termasuk indikator yang berkaitan dengan pelaksanaan RAKB. Evaluasi kinerja dilaksanakan secara berkala melalui forum manajemen yang didukung oleh sistem pelaporan yang transparan dan tepat waktu, sehingga memungkinkan dilakukannya penyesuaian strategi secara responsif. Selain itu, penguatan fungsi manajemen

schemes with various strategic partners, with the aim of broadening access to financing while im-proving process efficiency. Similarly, in terms of funding and service, the Bank continued to drive optimal funding growth while maintaining cost of funds, strengthening customer loyalty, and developing digital-based products and services, including through enhanced mobile and internet banking capabilities and the development of digital operations.

Furthermore, in operational and information technology aspects, the strategy focused on strengthening digital infrastructure, improving service quality, and continuously optimizing operational efficiency. Digital transformation continued to be driven through the development of digital banking, utilization of data analytics, and enhancement in security and compliance of information technology systems. In terms of marketing, Bank Victoria actively developed the innovations on products and services and expanded its market reach by optimizing office network and developing digital transactions. These efforts were also accompanied by increased financial literacy and inclusion, including in supporting the implementation of sustainable finance. Through these steps, the Bank strengthened customer engagement while broadening its base for business growth.

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

The formulation of the Bank's strategies and strategic policies is carried out through the management's active role in ensuring alignment between long-term vision, risk profile, and evolving industry dynamics. Strategy development is carried out comprehensively through the analysis of macroeconomic conditions, banking industry trends, regulatory changes relevant to the Bank's business activities, and internal performance evaluations to develop policies that are measurable, adaptive, and aligned with sustainability principles. Within such framework, RAKB serves as a reference for setting business priorities, managing risks, and strengthening the capital and liquidity structure, while maintaining the balance between growth and prudential principles.

To ensure effective strategy implementation, control and supervision mechanisms are strengthened by establishing measurable Key Performance Indicators (KPIs) across all organizational levels, including indicators related to the implementation of RAKB. Performance evaluations are conducted periodically through management forums, supported by a transparent and timely reporting system, enabling responsive strategy adjustments. Furthermore, risk management, compliance, and internal audit functions are continuously strengthened to ensure that the policy

risiko, kepatuhan, serta audit internal terus dilakukan guna memastikan implementasi kebijakan berjalan sesuai prinsip kehati-hatian dan ketentuan yang berlaku, seiring dengan optimalisasi pemanfaatan teknologi informasi dan pengembangan sumber daya manusia untuk mendukung efektivitas pelaksanaan strategi Bank.

Pencapaian Target dan Kinerja Keberlanjutan Bank Victoria

Kinerja Bank Victoria pada tahun 2025 menunjukkan capaian yang secara umum bergerak selaras dengan arah strategis yang telah ditetapkan. Peningkatan pendapatan bunga sebesar 10,89% menjadi Rp2,30 triliun atau mencapai 101,5% dari target, yang turut diperkuat oleh kenaikan pendapatan operasional lainnya sebesar 45,81%, menjadi faktor utama yang mendorong pertumbuhan laba tahun berjalan sebesar 11,78% menjadi Rp131,75 miliar atau sebesar 84,45% dari target. Hal ini mencerminkan bahwa penguatan kinerja pendapatan mampu memberikan kontribusi langsung terhadap peningkatan profitabilitas. Sejalan dengan itu, struktur pendapatan yang semakin beragam turut memperkuat kualitas kinerja keuangan secara berkesinambungan.

Dari sisi posisi neraca keuangan, total aset meningkat sebesar 16,61% menjadi Rp36,20 triliun atau mencapai 105,86% dari target yang ditetapkan. Peningkatan ini sejalan dengan bertambahnya liabilitas sebesar 17,41% menjadi Rp31,83 triliun serta pertumbuhan ekuitas sebesar 11,07% menjadi Rp4,37 triliun, yang mencerminkan penguatan struktur pendanaan dalam mendukung ekspansi usaha Bank. Pertumbuhan tersebut juga didukung oleh peningkatan penyaluran kredit kepada pihak ketiga sebesar 8,44% menjadi Rp22,16 triliun, serta kenaikan kredit kepada pihak berelasi sebesar 77,89% menjadi Rp219,63 miliar, yang menunjukkan penguatan fungsi intermediasi. Di sisi lain, total DPK meningkat 4,13% menjadi Rp24,29 triliun, dipengaruhi oleh peningkatan tabungan dan giro sebesar 14,88% dan 14,94%.

Dalam konteks tersebut, peningkatan *Loan to Deposit Ratio* (LDR) menjadi 92,12% dari 88,12% pada tahun sebelumnya mengindikasikan fungsi intermediasi yang semakin optimal dalam mendukung penyaluran kredit. Di sisi lain, rasio profitabilitas dan efisiensi menunjukkan dinamika yang perlu dicermati, dengan *Return on Assets* (ROA) tercatat sebesar 0,50% dan *Net Interest Margin* (NIM) sebesar 2,05% yang sedikit menurun dibandingkan tahun sebelumnya, serta Biaya Operasional terhadap Pendapatan Operasional (BOPO) yang meningkat menjadi 92,17%, yang mengindikasikan tekanan terhadap efisiensi operasional. Meskipun demikian, perbaikan kualitas aset yang tercermin dari penurunan *Non-Performing Loan* (NPL), baik bruto sebesar 2,49% maupun neto sebesar 1,73%, menunjukkan

implementation complies with prudential principles and applicable regulations, along with the optimization of information technology utilization and human capital development to support the effective implementation of the Bank's strategy.

Target Achievement and Sustainability Performance of Bank Victoria

Bank Victoria's performance in 2025 demonstrated that achievements were generally in line with the established strategic direction. The increase in interest income of 10.89% to Rp2.30 trillion, or 101.5% of the target, coupled with the increase in other operating income of 45.81%, was the primary factor driving the growth in profit for the year of 11.78% to Rp131.75 billion, or 84.45% of the target. These achievements reflected the strengthening of revenue performance, which directly contributed to the increased profitability. Consistently, the increasingly diversified revenue structure contributed to the sustained strengthening of financial performance.

In terms of balance sheet, the total assets increased by 16.61% to Rp36.20 trillion, or 105.86% of the target. This increase wwas in line with the increase in liabilities of 17.41% to Rp31.83 trillion and the increase in equity of 11.07% to Rp4.37 trillion, representing the strengthening funding structure to support the Bank's business expansion. This growth was also supported by the increase in lending to third parties of 8.44% to Rp22.16 trillion, as well as the increase in loans to related parties of 77.89% to Rp219.63 billion, indicating the strengthening of the intermediation function. On the other hand, the total DPK increased by 4.13% to Rp24.29 trillion, driven by the increase in savings deposits and demand deposits of 14.88% and 14.94%, respectively.

In this regard, the increase in Loan-to-Deposit Ratio (LDR) to 92.12% from 88.12% in the previous year indicated the increasingly optimal intermediation function in supporting lending. On the other hand, profitability and efficiency ratios exhibited dynamics that warranted close attention, with Return on Assets (ROA) recorded at 0.50% and Net Interest Margin (NIM) at 2.05%, a slight decrease compared to those of the previous year. Operating Expenses to Operating Income (BOPO) increased to 92.17%, indicating pressure on operational efficiency. Nevertheless, improvements in asset quality, reflected in the decline in Non-Performing Loans (NPL), both gross by 2.49% and net by 1.73%, demonstrated the effectiveness of credit risk management. These conditions contributed to

efektivitas pengelolaan risiko kredit. Kondisi ini turut menjaga stabilitas kinerja Bank, seiring dengan penguatan efisiensi dan struktur pendanaan.

Dari sisi keberlanjutan, Bank telah membentuk Tim Penyusun dan Pelaksana Aksi Keuangan Berkelanjutan melalui Surat Keputusan Direksi tanggal 30 April 2025, meningkatkan total pembiayaan terhadap kegiatan usaha berkelanjutan menjadi Rp469 miliar, serta menjalankan RAKB tahun 2025. Sepanjang tahun 2025, Bank Victoria secara konsisten memperkuat kualitas sumber daya manusia melalui berbagai program pengembangan yang terstruktur, termasuk pelatihan keuangan berkelanjutan yang diikuti oleh 120 peserta. Secara keseluruhan, program pelatihan telah menjangkau mayoritas karyawan, mencerminkan fokus Bank Victoria dalam memastikan kesiapan organisasi menghadapi dinamika bisnis yang terus berkembang. Komitmen ini menunjukkan bahwa penguatan kapabilitas SDM dan agenda keberlanjutan dijalankan secara terintegrasi sebagai bagian dari strategi transformasi Bank.

Demikian pula pada aspek keberlanjutan lingkungan, Bank telah mencatatkan perkembangan yang positif melalui pengelolaan operasional yang semakin efisien dan lebih selaras dengan prinsip keberlanjutan. Penggunaan energi tercatat menurun 14,32% menjadi 6.227,15 GJ, begitu juga emisi yang dihasilkan menurun 18,15% menjadi 1.179,41 ton CO2eq. Di sisi lain, penggunaan air tercatat sebesar 20.525,30 m^3 atau meningkat 2,22% dibandingkan tahun sebelumnya, sehingga tetap menjadi area yang perlu dikelola secara lebih cermat ke depan. Secara umum, capaian ini menunjukkan bahwa di tengah pertumbuhan usaha dan penguatan aktivitas operasional, Bank tetap berupaya menjaga efisiensi penggunaan sumber daya serta meminimalkan dampak lingkungan dari kegiatan operasional.

Komitmen Bank Victoria akan Penerapan Keuangan Berkelanjutan

Bank Victoria secara konsisten mengintegrasikan prinsip keuangan berkelanjutan ke dalam kegiatan usaha melalui penguatan tata kelola, pengembangan kapasitas internal, serta penyelarasan kebijakan strategis. Upaya ini antara lain diwujudkan melalui peningkatan kompetensi karyawan secara berkelanjutan agar memiliki pemahaman yang memadai terkait aspek ESG, sehingga mampu mendukung implementasi bisnis yang bertanggung jawab. Selain itu, penyusunan dan implementasi RAKB yang menjadi acuan dalam menetapkan prioritas strategis turut memastikan bahwa setiap inisiatif usaha selaras dengan prinsip keberlanjutan yang telah ditetapkan.

Dalam pelaksanaannya, Bank juga mengintegrasikan aspek keberlanjutan ke dalam kebijakan manajemen risiko guna mengidentifikasi, mengukur, dan mengelola potensi

maintaining the stability of the Bank's performance, along with strengthening efficiency and funding structure.

In terms of sustainability, the Bank established the Team for Preparing and Implementing Sustainable Financial Actions through the Board of Directors' Decision Letter dated 30 April 2025, increased total financing for sustainable business activities to Rp469 billion, and implemented the 2025 RAKB. Throughout 2025, Bank Victoria consistently strengthened the quality of its human capital through various structured development programs, including sustainable finance training attended by 120 participants. Overall, the training program reached the majority of employees, reflecting Bank Victoria's focus on ensuring the organization's readiness to face the ever-evolving business dynamics. This commitment demonstrated that strengthening of HC capabilities and the sustainability agenda were implemented in an integrated manner as part of the Bank's transformation strategy.

Similarly, in terms of environmental sustainability, the Bank recorded positive progress through the increasingly efficient operational management that aligned more closely with sustainability principles. Energy use decreased by 14.32% to 6,227.15 GJ, while emissions decreased by 18.15% to 1,179.41 tons CO2eq. Meanwhile, water use was recorded at 20,525.30 m3 or increased by 2.22% compared to the previous year, thus remaining areas that required more careful management going forward. Overall, these achievements demonstrated that amid business growth and strengthening operational activities, the Bank constantly strove to maintain efficient resource use and minimize the environmental impact of its operations.

Bank Victoria's Commitment to Implementing Sustainable Finance

Bank Victoria consistently integrates sustainable finance principles into its business activities through strengthened governance, internal capacity development, and strategic policy alignment. These efforts include continuously improving employee competency to ensure adequate understanding of ESG aspects, thereby supporting responsible business implementation. Furthermore, the development and implementation of RAKB, which serve as references for establishing strategic priorities, ensure that every business initiative is in line with the established sustainability principles.

In the implementation, the Bank also integrates sustainability aspects into its risk management policies to identify, measure, and manage potential risks related to economic,

risiko yang berkaitan dengan faktor ekonomi, sosial, dan lingkungan. Sinergi antara Unit Sistem dan Prosedur dengan berbagai unit kerja terus diperkuat untuk memastikan bahwa kebijakan dan prosedur operasional mampu mengakomodasi prinsip keuangan berkelanjutan secara konsisten. Pendekatan ini memungkinkan implementasi RAKB berjalan secara terstruktur dan terukur di seluruh lini operasional. Dengan dukungan tata kelola yang solid serta kolaborasi internal yang efektif, integrasi keuangan berkelanjutan dapat diimplementasikan secara selaras dengan kebutuhan bisnis dan ketentuan yang berlaku.

Penerapan Tata Kelola Perusahaan yang Baik

Penerapan tata kelola perusahaan yang baik (*Good Corporate Governance*/GCG) di Bank Victoria dilaksanakan sebagai fondasi utama dalam pengelolaan usaha yang tidak hanya berorientasi pada kepatuhan terhadap regulasi, tetapi juga pada peningkatan kinerja dan daya saing secara berkelanjutan. Implementasi GCG mengacu pada ketentuan Otoritas Jasa Keuangan serta Pedoman Umum Governansi Korporat Indonesia (PUGKI) 2021 yang berlandaskan pilar perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan. Dalam pelaksanaannya, Bank menetapkan *Corporate Governance Framework* yang disesuaikan dengan karakteristik operasional, budaya organisasi, dan nilai inti perusahaan, sehingga prinsip tata kelola dapat terintegrasi secara konsisten di seluruh lini bisnis dan mendukung pengambilan keputusan yang akuntabel serta transparan.

Untuk memastikan efektivitas implementasinya, Bank menerapkan mekanisme tata kelola yang mengacu pada praktik terbaik industri melalui penetapan standar kualitas, pengawasan, penilaian, serta peningkatan berkelanjutan melalui *benchmarking*. Evaluasi atas penerapan GCG dilakukan secara berkala melalui *self-assessment* yang mencakup 3 aspek utama, yaitu *governance structure, governance process*, dan *governance outcome*, dengan mempertimbangkan berbagai faktor penilaian yang relevan. Pada tahun 2025, hasil *self-assessment* GCG Bank berada pada peringkat 2 dengan predikat Baik, yang menunjukkan bahwa penerapan tata kelola secara umum telah berjalan dengan baik dan beberapa kelemahan yang ada dinilai berkurang signifikan dibandingkan tahun sebelumnya.

Dalam mendukung kualitas pengendalian internal, Bank menegaskan bahwa sistem pengendalian internal sepanjang tahun 2025 berada pada kondisi efektif dan memadai. Penguatan ini juga mencakup penerapan *Internal Control Over Financial Reporting* (ICOFR), pembentukan unit terkait, serta penegasan bahwa seluruh risiko yang muncul masih berada dalam batas toleransi. Selain itu, Bank juga menunjukkan penguatan nyata pada aspek manajemen risiko, *anti-fraud*, Anti-Pencucian Uang dan Pencegahan

social, and environmental factors. Synergy between the System and Procedure Unit and various work units is continuously strengthened to ensure that operational policies and procedures consistently accommodate sustainable finance principles. This approach enables RAKB implementation to be structured and measurable across all operational lines. With the support of solid governance and effective internal collaboration, the integration of sustainable finance can be implemented in alignment with business needs and applicable regulations.

Implementation of Good Corporate Governance

The implementation of Good Corporate Governance (GCG) at Bank Victoria serves as the main foundation for business management, oriented not only towards regulatory compliance but also towards continuously improving performance and competitiveness. GCG implementation adheres to the provisions of Financial Services Authority and the 2021 General Guidelines for Indonesian Corporate Governance (PUGKI), which are based on the pillars of ethical behavior, accountability, transparency, and sustainability. In its implementation, the Bank establishes a Corporate Governance Framework tailored to the operational characteristics, organizational culture, and corporate core values, ensuring consistent integration of governance principles across all business lines and supporting accountable and transparent decision-making.

To ensure an effective implementation, the Bank employs governance mechanisms according to the industry best practices through the establishment of quality standards, supervision, assessment, and continuous improvement through benchmarking. GCG implementation is evaluated periodically through self-assessments that cover 3 main aspects, namely governance structure, governance process, and governance outcome, with due regard to various relevant assessment factors. In 2025, the Bank's GCG self-assessment was in rank 2 with a Good rating, indicating that overall governance implementation was properly-implemented and that several weaknesses were significantly reduced compared to those of the previous year.

To support the quality of internal control, the Bank confirmed that the internal control system was effective and adequate throughout 2025. This strengthening also included the implementation of Internal Control Over Financial Reporting (ICOFR), establishment of related units, and affirmation that all emerging risks remained within tolerable limits. Furthermore, the Bank also demonstrated tangible strengthening in aspects of risk management, anti-fraud, Anti-Money Laundering and Counter-Terrorist

Pendanaan Terorisme (APU-PPT), serta Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (PPPSPM). Salah satu cerminan pentingnya adalah nilai *Financial Integrity Rating on Money Laundering/Terrorism Financing* (FIR on ML/TF) pada 2025 sebesar 9,33 dengan predikat Sangat Baik. Pencapaian ini menunjukkan komitmen Bank dalam mendukung integritas sistem keuangan nasional, memperkuat kualitas pelaporan, dan menjaga kepatuhan terhadap standar pencegahan kejahatan keuangan yang semakin kompleks.

Financing (AML-CTF), and Counter-Proliferation Financing of Weapons of Mass Destruction (CPF). One important reflection was the Financial Integrity Rating on Money Laundering/Terrorist Financing (FIR on ML/TF) in 2025 of 9.33, with a predicate of Very Good. This achievement demonstrated the Bank's commitment to supporting the integrity of the national financial system, strengthening reporting quality, and maintaining compliance with increasingly complex financial crime prevention standards.

Pada saat yang sama, Direksi menyadari masih terdapat ruang perbaikan, khususnya terkait ketepatan waktu dan akurasi pelaporan regulator. Hal tersebut telah menjadi perhatian serius manajemen dan akan terus ditindaklanjuti melalui penguatan sistem pelaporan, penetapan penanggung jawab yang lebih jelas, serta peningkatan *monitoring* secara berkelanjutan.

At the same time, the Board of Directors realizes that there is still room for improvement, particularly regarding the timeliness and accuracy of regulatory reporting. Such matter has been a serious concern for management and will continue to be addressed through strengthening the reporting system, establishing clearer responsibilities, and improving ongoing monitoring.

Prospek Usaha Tahun 2026

Tahun 2026 diperkirakan masih diwarnai oleh dinamika perekonomian global yang penuh tantangan. Pertumbuhan ekonomi global diproyeksikan melambat ke kisaran 3,2% seiring meningkatnya ketidakpastian akibat tensi geopolitik dan kebijakan perdagangan antarnegara. Di tengah kondisi tersebut, perekonomian Indonesia tetap menunjukkan ketahanan yang baik dengan proyeksi pertumbuhan pada kisaran 4,9%-5,7% serta inflasi yang terjaga dalam rentang sasaran Bank Indonesia. Kinerja ini didukung oleh kuatnya konsumsi domestik, peningkatan investasi, serta stabilitas kebijakan makroekonomi, sehingga memberikan landasan yang cukup solid bagi keberlanjutan aktivitas ekonomi nasional.

Business Outlook for 2026

The year 2026 is expected to continuously be filled with challenging global economic dynamics. Global economic growth is projected to slow to around 3.2% due to increasing uncertainty caused by geopolitical tensions and international trade policies. Amidst these conditions, Indonesia's economy continues to demonstrate good resilience, with projected growth in the range of 4.9%-5.7% and inflation maintained within Bank Indonesia's target range. This performance is supported by strong domestic consumption, increased investment, and stable macroeconomic policies, providing a solid foundation for the sustainability of national economic activity.

Sejalan dengan kondisi tersebut, industri perbankan diperkirakan tetap memiliki prospek yang positif, terutama dari sisi fungsi intermediasi yang terus menunjukkan tren pertumbuhan. Pada awal tahun 2026, pertumbuhan kredit tercatat sebesar 9,96%, meningkat dibandingkan periode sebelumnya, yang diproyeksikan akan terus berlanjut dengan kisaran pertumbuhan pada rentang 8%-12% sepanjang tahun. Hal ini didukung oleh permintaan pembiayaan yang tetap terjaga serta pelonggaran kebijakan penyaluran kredit. Di sisi lain, prinsip kehati-hatian tetap dikedepankan dalam mengantisipasi risiko, khususnya pada segmen konsumsi serta Usaha Mikro, Kecil, dan Menengah (UMKM). Dukungan kebijakan yang terkoordinasi antara regulator dan pemerintah juga memperkuat prospek industri dalam menjaga stabilitas sekaligus mendorong pertumbuhan yang berkelanjutan.

In line with these conditions, banking industry is expected to maintain positive prospects, particularly from intermediation function, which continues to show a growth trend. At the beginning of 2026, loan growth is recorded at 9.96%, an increase compared to the previous period. This growth is projected to continue at a range of 8%-12% throughout the year. This is supported by maintained financing demand and relaxed lending policies. Meanwhile, prudential principles remain at the forefront in anticipating risks, particularly in consumer segment and Micro, Small, and Medium Enterprises (MSMEs). Coordinated policy support between regulators and the government also strengthens the industry's prospects in maintaining stability while encouraging sustainable growth.

Dalam merespons prospek tersebut, Bank Victoria menetapkan strategi dan target usaha yang terukur untuk tahun 2026 dengan tetap mengedepankan prinsip kehati-

In response to this outlook, Bank Victoria establishes measurable business strategies and targets for 2026, while prioritizing prudential and sustainable principles. The Bank

hatian dan keberlanjutan. Bank menargetkan pertumbuhan DPK pada kisaran 5%, kredit sekitar 7%, serta total aset sekitar 6%, dengan menjaga rasio kecukupan modal pada level yang kuat sekitar 23,85%. Selain itu, Bank berupaya mempertahankan margin bunga bersih di atas 2,0% melalui pengendalian biaya dana, serta meningkatkan kualitas aset dengan menurunkan rasio NPL neto menjadi sekitar 1,35%. Upaya tersebut didukung oleh penguatan struktur pendanaan, pengembangan jaringan kantor secara selektif, serta percepatan transformasi digital melalui pengembangan produk dan layanan yang lebih inovatif dan berorientasi pada kebutuhan nasabah.

targets DPK growth of around 5%, loans of around 7%, and total assets of around 6%, while maintaining a strong capital adequacy ratio of around 23.85%. Furthermore, the Bank strives to maintain a net interest margin above 2.0% by controlling its cost of funds and improving asset quality by reducing net NPL ratio to around 1.35%. These efforts are supported by the strengthening of funding structure, selectively expanding office network, and accelerating digital transformation through the development of more innovative, customer-oriented products and services.

Perubahan Komposisi Anggota Direksi

Sepanjang tahun 2025, tidak terdapat perubahan terkait komposisi anggota Direksi Bank Victoria. Komposisi Direksi yang menjabat hingga saat ini meliputi:

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

Changes in the Board of Directors' Composition

Throughout 2025, there were no changes to the composition of the Board of Directors of Bank Victoria. The current composition of the Board of Directors includes as follows:

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

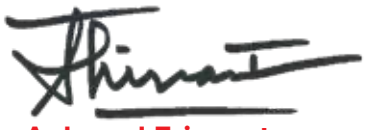
Penutup

Menutup laporan ini, seluruh jajaran Direksi menyampaikan apresiasi kepada Dewan Komisaris atas arahan, dukungan, dan pengawasan yang telah diberikan sepanjang tahun buku 2025, yang turut mendukung pelaksanaan strategi secara terarah. Penghargaan juga disampaikan kepada seluruh karyawan atas dedikasi dan komitmen yang berkontribusi dalam menjalankan kegiatan usaha Bank. Selain itu, disampaikan pula ungkapan terima kasih kepada para Pemegang Saham, nasabah, regulator, serta seluruh pemangku kepentingan atas kepercayaan dan dukungan yang diberikan. Dukungan tersebut menjadi bagian penting dalam mendorong upaya peningkatan kinerja, pengembangan layanan, serta penguatan peran Bank dalam memberikan nilai tambah yang berkelanjutan.

Closing

In closing this report, the entire Board of Directors would like to express appreciation to the Board of Commissioners for their guidance, support, and supervision throughout the 2025 fiscal year, which contributed to the targeted implementation of the strategy. Appreciation also goes to all employees for their dedication and commitment in contributing to the Bank's business operations. Furthermore, we would like to express our gratitude to the Shareholders, customers, regulators, and all stakeholders for their trust and support. Such support serves as an important part in driving performance improvement, service development, and strengthening of the Bank's role in providing sustainable added value.

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



Achmad Friscantono
Direktur Utama
President Director

Direksi
Board of Directors



1
Achmad Friscantono
Direktur Utama
President Director

2
Rusli
Wakil Direktur Utama
Deputy President Director

3
Lembing
Direktur Bisnis
Director of Business

4
Debora Wahjutirto Tanoyo
Direktur Keuangan
Director of Finance

5
Tamunan
Direktur Kepatuhan dan Manajemen Risiko
Director of Compliance and Risk Management

Tanggung Jawab Laporan Tahunan dan Keberlanjutan

Annual and Sustainability Report Responsibility

Surat Pernyataan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan dan Keberlanjutan 2025 PT Bank Victoria International Tbk

Statement of Members of the Board of Commissioners on the Responsibility for the 2025 Annual and Sustainability Report of PT Bank Victoria International Tbk

Kami, yang bertanda tangan di bawah ini, menyatakan bahwa semua informasi dalam Laporan Tahunan dan Keberlanjutan PT Bank Victoria International Tbk tahun 2025 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan dan Keberlanjutan Bank.

Demikian pernyataan ini dibuat dengan sebenarnya.

We, the undersigned, hereby declare that all information in the Annual and Sustainability Report of PT Bank Victoria International Tbk for year 2025 has been fully contained and we shall be fully responsible to the correctness of contents in the Annual and Sustainability Report of the Bank.

This statement is hereby made in all truthfulness.

Jakarta, April 2026

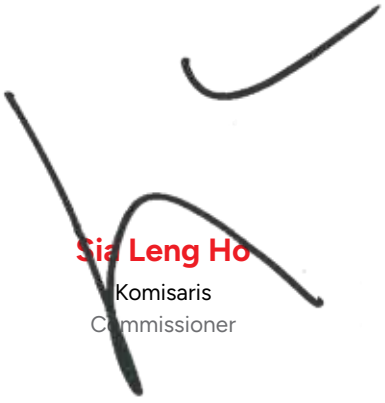
Dewan Komisaris
Board of Commissioners



Zaenal Abidin Ph.D
Komisaris Utama Independen
Independent President Commissioner



Gunawan Tenggarahardja
Komisaris Independen
Independent Commissioner



Sia Leng Ho
Komisaris
Commissioner

Surat Pernyataan Anggota Direksi tentang Tanggung Jawab atas Laporan Tahunan dan Keberlanjutan 2025 PT Bank Victoria International Tbk

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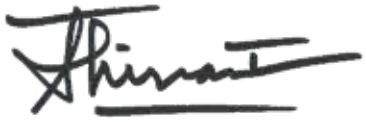
Direksi
Board of Directors



Achmad Friscantono
Direktur Utama
President Director



Rusli
Wakil Direktur Utama
Deputy President Director



Lembing
Direktur Bisnis
Director of Business



Debora Wahjutirto Tanoyo
Direktur Keuangan
Director of Finance



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

Profil Perusahaan

Company Profile



03.



Identitas Perusahaan
Company Identity

PT Bank Victoria International Tbk

Alamat [POJK C.2]
Address

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corsec@victoriabank.co.id
www.victoriabank.co.id

Dasar Hukum Pendirian
Legal Basis of Establishment

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

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

Tanggal Pendirian
Date of Establishment

28 Oktober 1992
28 October 1992

Bidang Usaha
Line of Business

Bank Umum
Commercial Bank

Modal Dasar
Authorized Capital

Rp4,100,000,000,000

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

Rp1,841,941,882,800

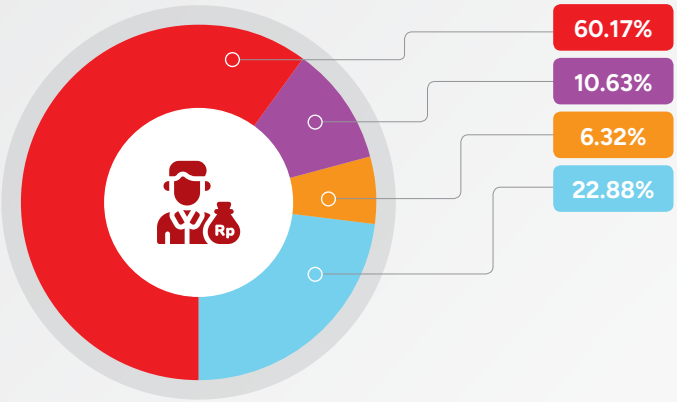
Keterangan / Description:
Pada tahun 2025, Bank Victoria tidak melakukan perubahan nama.
In 2025, Bank Victoria did not make any changes to its name.

Perubahan Organisasi yang Bersifat Signifikan [POJK C.6]
Significant Changes in Organization

Pada tahun 2025, Bank Victoria melakukan penutupan Kantor Cabang Pembantu Tanah Abang Blok B, Kantor Cabang Pembantu Kelapa Gading Boulevard, dan Kantor Cabang Pembantu Gading Serpong. Selain itu, dalam memperluas jangkauan layanan perbankan di wilayah Bali, Bank juga membuka Kantor Fungsional terbarunya yang berlokasi di Cross Vibe Paasha Atelier Kuta, Bali.

In 2025, Bank Victoria closed its Sub-Branch Office Tanah Abang Blok B, Sub-Branch Office Kelapa Gading Boulevard, and Sub-Branch Office Gading Serpong. Furthermore, to expand its banking services reach in Bali region, the Bank also opened its newest functional office located at Cross Vibe Paasha Atelier Kuta, Bali.

Kepemilikan Saham
Share Ownership



PT Victoria Investama Tbk	:	60.17%
Chemical Asia Corporation Pte Ltd	:	10.63%
Suzanna Tanojo	:	6.32%
Masyarakat / Public <5%	:	22.88%

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

30 Juni 1999
30 June 1999

Dasar Hukum Perubahan Nama
Legal Basis of Name Change

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

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

Kode Saham
Share Code

BVIC

Media Sosial
Social Media

@bankvictoria | Bank Victoria | BankVictoriaID | PT Bank Victoria International Tbk

Skala Usaha [POJK C.3]
Business Scale

Jaringan Kantor
Office Network

1 Kantor Pusat Head Office	21 Kantor Cabang Pembantu Sub-Branch Offices
14 Kantor Cabang Utama Main Branch Offices	1 Kantor Fungsional Functional Office

Wilayah Operasional
Operational Areas

- Jakarta
- Bogor
- Bandung
- Semarang
- Solo
- Surabaya
- Bali
- Medan
- Manado
- Makassar

Total Karyawan (per Desember 2025)
Total Employees (as of December 2025)

723 Orang / People

Total Aset (Per Desember 2025)
Total Assets (As of December 2025)

Rp36.20 triliun / trillion

Total Liabilitas (Per Desember 2025)
Total Liabilities (As of December 2025)

Rp31.83 triliun / trillion

Riwayat Singkat
Brief History

1992-2007

1992
Didirikan di Jakarta dengan nama PT Bank Victoria pada tanggal 28 Oktober 1992.
Incorporated in Jakarta under the name PT Bank Victoria on 28 October 1992.

1994
Memulai operasi sebagai Bank Umum secara komersial berdasarkan izin dari Menteri Keuangan Republik Indonesia pada tanggal 5 Oktober 1994.
Started its operations as a Commercial Bank based on the license from the Finance Minister of the Republic of Indonesia dated 5 October 1994.

1997
Memperoleh izin dari Bank Indonesia untuk beroperasi sebagai Pedagang Valuta Asing pada tanggal 25 Mei 1997.
Obtained Foreign Exchange License from Bank Indonesia to operate as a Foreign Exchange Trader on 25 May 1997.

1999
Menjadi perusahaan publik dengan melakukan Penawaran Umum Perdana Saham sejumlah 250.000.000 lembar saham dengan nilai nominal Rp100,- per saham dan sejumlah 80.000.000 Waran Seri I efektif pada tanggal 4 Juni 1999.
Became a publicly listed company by conducting an initial public offering of 250,000,000 shares with a nominal value of Rp100 per share and 80,000,000 Series I Warrants effectively on 4 June 1999.

2000
Melakukan Penawaran Umum Terbatas (PUT) I sejumlah 614.000.000 lembar saham dengan nilai nominal sebesar Rp100,- per saham dengan harga yang ditawarkan sebesar Rp115,- per saham dan sejumlah 85.960.000 Waran Seri II pada tanggal 28 September 2000.
Conducted a Limited Public Offering (LPO) I of 614,000,000 shares with a nominal value of Rp100 per share and offering price of Rp115 per share and 85,960,000 Series II Warrants on 28 September 2000.

2003
Melakukan PUT II sejumlah 705.243.360 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 423.146.016 Waran Seri III pada tanggal 20 Maret 2003.
Conducted LPO II of 705,243,360 shares with both nominal value and offering price of Rp100 per share and 423,146,016 Series III Warrants on 20 March 2003.

2006
Melakukan PUT III sejumlah 670.363.760 lembar saham dengan nilai nominal Rp100,- per saham dengan harga yang ditawarkan sebesar Rp115,- per saham dan sejumlah 469.277.676 Waran Seri IV pada tanggal 13 Juli 2006.
Conducted LPO III of 670,363,760 shares with a nominal value of Rp100 per share and offering price of Rp115 per share and 469,277,676 Series IV Warrants on 13 July 2006.

2007
Mengakuisisi PT Bank Swaguna sebagai Entitas Anak.
Acquired PT Bank Swaguna as a Subsidiary.

2008-2018

2008
Melakukan PUT IV sejumlah 1.167.498.560 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 630.449.220 Waran Seri V pada tanggal 11 Juli 2008.
Conducted LPO IV of 1,167,498,560 shares with both nominal value and offering price of Rp100 per share and 630,449,220 Series V Warrants on 11 July 2008.

2010
Melakukan perubahan nama Entitas Anak Bank Victoria dari PT Bank Swaguna menjadi PT Bank Victoria Syariah pada tanggal 19 Januari 2010.
Changed the name of Bank Victoria's Subsidiary from PT Bank Swaguna to PT Bank Victoria Syariah on 19 January 2010.

2011
Melakukan PUT V sejumlah 1.954.919.259 lembar saham dengan nilai nominal dan harga yang ditawarkan sebesar Rp100,- per saham dan sejumlah 1.448.939.990 Waran Seri VI pada 4 Juli 2011.
Conducted LPO V of 1,954,919,259 shares with both nominal value and offering price of Rp100 per share and 1,448,939,990 Series VI Warrants on 4 July 2011.

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

2018
Memperluas jaringan kantor dengan membuka Kantor Cabang Utama di Semarang, Jawa Tengah dan Makassar, Sulawesi Selatan.
Expanding the office network by opening Main Branch Offices in Semarang, Central Java, and Makassar, South Sulawesi.

2019-2023

2019

- Melakukan PMTHMETD sejumlah 280.898.877 lembar saham oleh PT Victoria Investama Tbk dan PT Nata Patindo.
- Memperluas jaringan kantor dengan membuka Kantor Cabang Utama di Solo, Jawa Tengah dan Medan, Sumatera Utara.
- Conducted PMTHMETD of 280,898,877 shares of PT Victoria Investama Tbk and PT Nata Patindo.
- Expanded the office network by opening Main Branch Offices in Solo, Central Java, and Medan, North Sumatra.

2020

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

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

2021

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

2022

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

2023

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

2024-2025

2024

- Melakukan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria International Tbk sejumlah 294.441 Waran.
- Melakukan Penawaran Umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 sebesar Rp500.000.000.000,-.
- Melakukan Penawaran Umum Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 sebesar Rp500.000.000.000,-.
- Melakukan relokasi Kantor Cabang Pembantu Senayan City ke Kantor Cabang Pembantu Hang Tuah.
- Added Shares from Series VII Warrant Exercise of PT Bank Victoria International Tbk of 294,441 Warrants.
- Conducted Public Offering of Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024 amounting to Rp500,000,000,000.
- Conducted Public Offering of Bank Victoria Continuing Bonds III Phase II Year 2024 amounting to Rp500,000,000,000.
- Relocated Sub-Branch Office Senayan City to Sub-Branch Office Hang Tuah.

2025

- **Melakukan Penambahan Saham Hasil *Exercise* Waran Seri VII PT Bank Victoria International Tbk sejumlah 2.570.885.922 Waran.**
- **Melakukan Penawaran Umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 sebesar Rp500.000.000.000,-.**
- **Melakukan Penawaran Umum Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 sebesar Rp750.000.000.000,-.**
- **Melakukan Penawaran Umum Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 sebesar Rp750.000.000.000,-.**
- **Melakukan penutupan Kantor Cabang Pembantu Tanah Abang Blok B, Kantor Cabang Pembantu Kelapa Gading Boulevard, dan Kantor Cabang Pembantu Gading Serpong**
- **Melakukan pembukaan Kantor Fungsional yang berlokasi di Cross Vibe Paasha Atelier Kuta, Bali.**
- **Melakukan penjualan seluruh saham Bank Victoria di Bank Victoria Syariah kepada PT Bank Tabungan Negara (Persero) Tbk.**
- **Menjadi peserta Bursa Tenaga Listrik Terbarukan di Bursa Komoditi dan Derivatif Indonesia (ICDX).**
- **Added Shares from Series VII Warrant Exercise of PT Bank Victoria International Tbk of 2,566,676,887 Warrants.**
- **Conducted Public Offering of Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025 amounting to Rp500,000,000,000.**
- **Conducted Public Offering of Bank Victoria Continuing Bonds IV Phase I Year 2025 amounting to Rp750,000,000,000.**
- **Conducted Public Offering of Bank Victoria Continuing Bonds IV Phase II Year 2025 amounting to Rp750,000,000,000.**
- **Closed Tanah Abang Blok B Sub-Branch Office, Kelapa Gading Boulevard Sub-Branch Office, and Gading Serpong Sub-Branch Office.**
- **Opened Functional Office located at Cross Vibe Paasha Atelier Kuta, Bali.**
- **Conducting a sale of all of Bank Victoria's shares in Bank Victoria Syariah to PT Bank Tabungan Negara (Persero) Tbk.**
- **Becoming participant in the Renewable Electricity Exchange on the Indonesia Commodity and De-rivatives Exchange (ICDX).**

Visi dan Misi Perusahaan [POJK C.1]
Company's Vision and Mission

VISI Vision

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

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



Pilihan Nasabah
Customers' Preferred

Bank Victoria dikenal, dipercaya, serta menjadi pilihan nasabah untuk memenuhi kebutuhan nasabah dalam mendapatkan produk dan layanan perbankan.

Bank Victoria is recognized, trusted, and preferred by customers to fulfill their needs in obtaining banking products and services.

Dipercaya
Trustworthy

Bank Victoria berkomitmen menjadi bank yang bisa memberikan rasa aman dan kepastian bagi para nasabah, karyawan, Pemegang Saham, dan stakeholders lainnya.

Bank Victoria is committed to being the bank that can provide security and certainty to the customers, human capital, Shareholders, and other stakeholders.

Sehat dan Efisien
Sound and Efficient

Bank Victoria mempunyai struktur modal yang kuat, kondisi keuangan yang sehat, serta didukung oleh operasional perbankan yang efisien.

Bank Victoria has strong capital structure, sound financial condition, and is supported by efficient banking operation.

Mendukung Pertumbuhan Berkelanjutan
Support Sustainable Growth

Bank Victoria senantiasa memperhatikan pertumbuhan yang mengedepankan aspek manusia (people), lingkungan (*planet*), dan nilai bagi pemangku kepentingan (*profit*).

Bank Victoria always pays attention to growth that prioritize aspects of people, environment (planet), and value for stakeholders (profit).

Pernyataan Persetujuan atas Visi dan Misi Perusahaan
Statement of Approval of the Company's Vision and Mission

Bank telah menetapkan visi dan misi sebagai landasan strategis dalam menentukan arah pengembangan usaha ke depan. Penetapan visi dan misi tersebut dituangkan dalam Surat Keputusan Direksi No. 004/SK-DIR/11/24 tanggal 13 November 2024 tentang Visi dan Misi Bank.

The Bank has established vision and mission as a strategic basis for determining the direction of future business development. This vision and mission establishment are outlined in Board of Directors' Decision Letter No. 004/SK-DIR/11/24 dated 13 November 2024 on the Bank's Vision and Mission.

MISI Mission



Customers

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

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

People

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

Developing human resources with integrity, professionalism, and dedication.

Operations

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

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

Governance, Risk, and Compliance

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

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

Digitalisasi / Digitalization

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

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

Tinjauan Ulang Visi dan Misi oleh Dewan Komisaris dan Direksi

Review and Approval of Vision and Mission by the Board of Commissioners and Board of Directors

Visi dan Misi Bank ditinjau secara berkala dengan melibatkan Dewan Komisaris dan Direksi guna memastikan kesesuaiannya dengan dinamika perkembangan bisnis, kebutuhan para pemangku kepentingan, serta arah persaingan di industri jasa keuangan. Sampai akhir tahun 2025, Dewan Komisaris dan Direksi menilai bahwa Visi dan Misi Bank Victoria masih relevan dan selaras dengan arah pertumbuhan serta strategi bisnis Bank.

The Bank's Vision and Mission are periodically reviewed by involving the Board of Commissioners and Board of Directors. This review is aimed at ensuring its alignment with the dynamics of business development, stakeholder needs, and competition direction in financial services industry. As of the end of 2025, the Board of Commissioners and Board of Directors considered that Bank Victoria's Vision and Mission remained relevant and in line with the Bank's growth direction and business strategy.

Nilai Budaya Perusahaan
Corporate Cultural Values

Bank Victoria telah menetapkan nilai budaya perusahaan yaitu SQEW sebagai filosofi inti yang diyakini mampu mendukung pencapaian visi dan misi bank. Nilai budaya perusahaan tersebut mencerminkan prinsip-prinsip utama yang menjadi acuan bagi seluruh insan Bank dalam menciptakan lingkungan kerja yang kondusif, mendorong etika kerja yang produktif, serta memperkuat nilai-nilai yang mendukung pencapaian tujuan strategis Bank.

Bank Victoria has established corporate cultural values, namely SQEW, as a core philosophy, believed to support the achievement of the Bank's vision and mission. These corporate cultural values reflect the main principles that serve as a reference for all Bank employees in creating conducive work environment, promoting productive work ethic, and strengthening values that support the achievement of the Bank's strategic goals.

S — ***Safe***

Relasi yang Aman dan Handal

Safe and Reliable Relationships

Q — ***Quick***

Solusi dan Inovasi yang Cepat, Tepat, Terukur

Fast, Precise, Measurable Solutions and Innovation

E — ***Easy***

Mudah dalam Transaksi dan Kolaborasi

Easy Transaction and Collaboration

W — ***Warm***

Melayani dengan Peduli, Ramah, dan Asertif

Serving with Care, Friendly, and Assertive

Kegiatan Usaha [POJK C.4]
Line of Business

Bank Victoria melakukan kegiatan usaha sebagai bank umum dengan berpedoman pada Pasal 3 Anggaran Dasar Bank yang tercantum dalam Akta No. 26 tanggal 14 Juni 2024. Untuk mencapai maksud dan tujuan tersebut, Bank melaksanakan kegiatan usaha utama dan kegiatan usaha penunjangnya sebagai berikut:

Bank Victoria conducts its business activities as a commercial bank, guided by Article 3 of the Bank's Articles of Association, as stated in Deed No. 26 dated 14 June 2024. To achieve such aims and objectives, the Bank carries out the following main business activities and supporting business activities:

Kegiatan Usaha berdasarkan Anggaran Dasar yang Dijalankan pada Tahun 2025
Business Activities Run in 2025 by Articles of Association

Kegiatan Usaha Utama Main Business Activities	
• Menghimpun dana dari masyarakat dalam bentuk simpanan giro, deposito berjangka, sertifikat deposito, tabungan, dan/atau bentuk lainnya yang dipersamakan dengan itu; • Memberikan kredit; • Menerbitkan surat pengakuan utang; • Membeli, menjual, atau menjamin atas risiko sendiri maupun untuk kepentingan dan atas perintah nasabahnya: a. Surat-surat wesel, termasuk wesel yang diakseptasi oleh Bank yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat dimaksud; b. Surat pengakuan utang dan kertas dagang lainnya yang masa berlakunya tidak lebih lama dari kebiasaan dalam perdagangan surat-surat dimaksud; c. Kertas perbendaharaan negara dan surat jaminan pemerintah; d. Sertifikat Bank Indonesia (SBI); e. Obligasi; f. Surat dagang berjangka waktu sampai dengan 1 (satu) tahun; dan g. Instrumen surat berharga lain yang berjangka waktu sampai dengan 1 (satu) tahun; • Memindahkan uang, baik untuk kepentingan sendiri maupun untuk kepentingan nasabah; • Menempatkan dana pada, meminjam dana dari, atau meminjamkan dana kepada bank lain, baik dengan menggunakan surat, sarana telekomunikasi maupun dengan wesel unjuk, cek, atau sarana lainnya; • Menerima pembayaran dari tagihan atas surat berharga dan melakukan perhitungan dengan atau antara pihak ketiga; • Melakukan penempatan dana dari nasabah kepada nasabah lainnya dalam bentuk surat berharga yang tercatat di bursa efek; • Melakukan kegiatan dalam valuta asing dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia; • Menyediakan pembiayaan dan/atau melakukan kegiatan lain berdasarkan prinsip syariah, sesuai dengan ketentuan yang ditetapkan oleh Bank Indonesia; serta • Melakukan kegiatan yang berkaitan dengan penyediaan jasa pembayaran kepada pengguna akhir (*end user*) jasa layanan Sistem Pembayaran (SP) pada sisi *front end* yang mencakup aktivitas, antara lain menampilkan informasi sumber dana, menginisiasi transaksi/*acquiring* (dompet elektronik, *acquirer*, dan *payment gateway*), menerbitkan instrumen/akun pembayaran, dan layanan remintansi/transaksi dana.	• Collect funds from the society in the form of current accounts, time deposits, certificates of deposit, savings, and/or other forms equivalent; • Provide credits; • Issue debt certificates; • Buy, sell, or guarantee on own risk and for the interest and upon the order of its customers: a. Money orders, including accredited money orders by the Bank in which the validity period is not longer than the custom of the trade of the said papers; b. Debt certificates and other trade papers in which the validity period is not longer than the custom of the trade of the said papers; c. State treasury bills and government guarantee letter; d. Bank Indonesia Certificates (SBI); e. Bonds; f. Commercial papers with validity period of up to 1 (one) year; and g. Other securities instruments with validity period of up to 1 (one) year; • Transfer of money, both for own interest and for the customers' interest; • Place funds in, borrow funds from, or lend funds to other banks, either by mail, telecommunication means, or by sight draft, check, or other means; • Receive payments from claims on securities and perform calculations with or between third parties; • Perform placement of funds from a customer to another customer in the form of securities listed in stock exchange; • Perform activities in foreign currencies by meeting the provisions stipulated by Bank Indonesia; • Provide financing and/or perform other activities based on sharia principles, in accordance with the provisions stipulated by Bank Indonesia; and • Perform activities related to provision of payment service to end users of Payment System (SP) services on the front end which includes activities such as displaying source of funds information, initiating transaction/acquiring (electronic wallet, acquirer, and payment gateway), issuing payment instrument/ account, and remittance/fund transaction services.

Kegiatan Usaha berdasarkan Anggaran Dasar yang Dijalankan pada Tahun 2025
Business Activities Run in 2025 by Articles of Association

Kegiatan Usaha Penunjang
Supporting Business Activities

- Menyediakan tempat untuk menyimpan barang dan surat berharga;
- Melakukan kegiatan penitipan untuk kepentingan pihak lain berdasarkan suatu kontrak;
- Melakukan kegiatan anjak piutang, usaha kartu kredit, dan kegiatan wali amanat;
- Bertindak sebagai pendiri dana pensiun dan pengurus dana pensiun sesuai dengan ketentuan dalam peraturan perundang-undangan dana pensiun yang berlaku;
- Melakukan kegiatan penyertaan modal pada bank atau perusahaan lain di bidang keuangan, sewa guna usaha, perusahaan modal ventura, perusahaan efek, asuransi, lembaga kliring penyelesaian dan penyimpanan dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia;
- Melakukan kegiatan penyertaan modal sementara untuk mengatasi akibat kegagalan kredit atau kegagalan pembiayaan berdasarkan prinsip syariah, dengan syarat harus menarik kembali penyertaannya dengan memenuhi ketentuan yang ditetapkan oleh Bank Indonesia; serta
- Melakukan kegiatan lain yang lazim dilakukan oleh bank sepanjang tidak bertentangan dengan undang-undang perbankan dan peraturan perundang-undangan yang berlaku.

- Provide place for storing valuables and securities;
- Conduct custodial activities for the benefits of others under a contract;
- Perform factoring activities, credit card business, and trustee activities;
- Act as the pension fund founder and pension fund manager in accordance with the provisions of the applicable pension fund laws and regulations;
- Conduct equity participation in a bank or other company in the field of finance, leasing companies, venture capital firms, securities companies, insurance companies, clearing and settlement institutions in compliance with the provisions stipulated by Bank Indonesia;
- Conduct temporary equity participation to overcome the consequences of credit failure or financing failure based on sharia principles, subject to withdrawal of statements by fulfilling the provisions stipulated by Bank Indonesia; and
- Conduct other activities commonly carried out by banks as long as they are not contradictory with banking laws and the applicable laws and regulations.



Produk dan Jasa [POJK C.4]
Products and Services

Bank Victoria berkomitmen untuk menghadirkan produk dan layanan perbankan yang inovatif, kompetitif, dan berorientasi pada kebutuhan nasabah. Sebagai mitra keuangan yang andal, Bank melayani berbagai segmen nasabah, baik individu maupun pelaku usaha, melalui penyediaan solusi keuangan yang menyeluruh dan terpercaya. Produk dan layanan yang ditawarkan terbagi dalam 5 (lima) kategori, yaitu produk simpanan, produk pembiayaan, jasa layanan lainnya, layanan bank devisa, serta produk investasi yang dirancang secara fleksibel dan adaptif guna menjawab dinamika pasar serta mendukung pertumbuhan keuangan nasabah secara berkelanjutan. Uraian terkait produk dan layanan jasa Bank Victoria diuraikan sebagai berikut:

Bank Victoria is committed to providing innovative, competitive, and customer-oriented banking products and services. As a reliable financial partner, the Bank serves various customer segments, both individuals and businesses, by providing comprehensive and reliable financial solutions. The products and services offered are divided into 5 (five) categories: savings products, financing products, other services, foreign exchange bank services, and investment products. These products are designed flexibly and adaptively to respond to market dynamics and support sustainable customer financial growth. Bank Victoria's products and services are outlined as follows:

Jenis Produk/Layanan
Type of Products/Services

Produk Simpanan
Savings Products

Tabungan / Savings
- Tabungan Victoria / Victoria Savings
- Tabungan VIP Safe / VIP Safe Savings
- Tabungan Victoria Junior / Victoria Junior Savings
- Tabungan Victoria Bisnis / Victoria Business Savings
- TabunganKu / TabunganKu
- Tabungan Victoria Maxima / Victoria Maxima Savings
- Tabungan Victoria EduSave / Victoria EduSave Savings
- Tabungan VIP Safe Digital / VIP Safe Digital Savings

Giro / Demand Deposit
- Giro Rupiah dan Giro Valas / Rupiah Current Account and Foreign Current Account
- VIP Giro Rupiah dan VIP Giro Valas / VIP Rupiah Current Account and VIP Foreign Current Account

Deposito / Time Deposits
- Deposito Rupiah / Rupiah Time Deposits
- Deposito US Dollar / US Dollar Time Deposits
- Deposito Online / Online Deposits

Produk Pinjaman
Loan Products

Kredit Produktif / Productive Loans
- Commercial Lending
- Small Medium Enterprise Lending
- Multi Finance Lending
- Bank Garansi / Bank Guarantee
- Surat Kredit Berdokumen Dalam Negeri (SKBDN) / Domestic Letter of Credit (SKBDN)
- L/C (*Letter of Credit*)

Kredit Konsumtif / Consumptive Loans
- Kredit Pemilikan Rumah / Home Ownership Loan
- Kredit Pemilikan Mobil / Car Ownership Loan
- Kredit Multi Guna / Multi-Purpose Loan

Jasa Layanan Lainnya
Other Services

- Kliring/Warkat Debit / Clearing/Debit Draft
- Transfer (SKNBI, BI-FAST, BI-RTGS) / Transfer (SKNBI, BI-FAST, BI-RTGS)
- Pembayaran Tagihan (PLN, Telkom, PDAM, BPJS, TV/ Internet, Kartu Kredit) / Billing Payment (PLN, Telkom, PDAM, BPJS, TV/Internet, Credit Card)
- Kartu ATM / ATM Card
- Auto Save
- *Internet Banking Retail & Victoria Mobile*
- *Internet Banking* Bisnis / Business Internet Banking
- *Bank Notes*
- *Bank* Persepsi / Collecting Bank
- *Virtual Account*

Layanan Bank Devisa
Foreign Exchange Bank Services

- Transaksi Kiriman Uang (*Remittance*)
- Perdagangan Internasional / International Trade Finance
- *Treasury* dan Layanan Interbank Lainnya / Treasury and Other Interbank Services

Produk Investasi
Investment Products

- Surat Berharga Negara (SBN) / Government Bonds (SBN)
- Reksa Dana / Mutual Funds
- *Bancassurance*

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



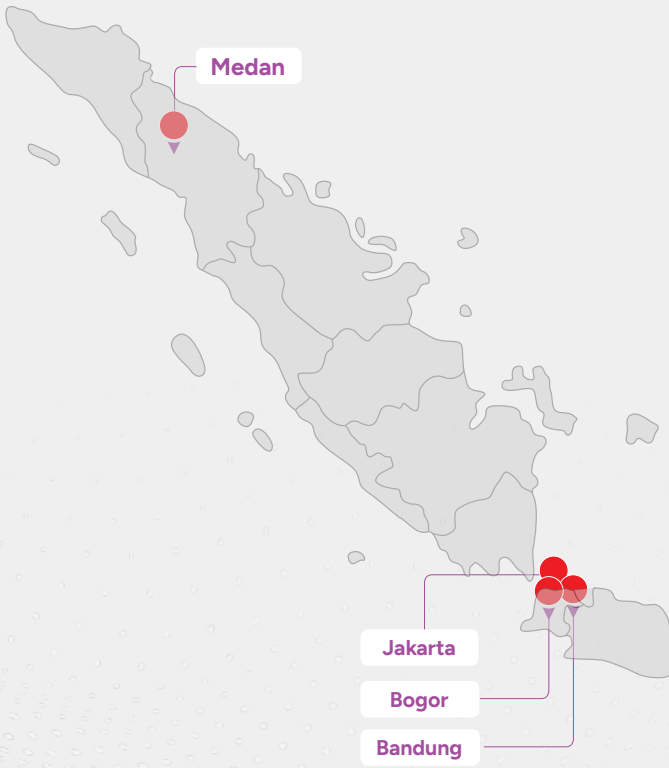
Wilayah Operasional [POJK C.3]
Operational Areas

1 **Kantor Pusat**
Head Office

14 **Kantor Cabang Utama**
Main Branch Offices

21 **Kantor Cabang Pembantu**
Sub-Branch Offices

1 **Kantor Fungsional**
Functional Office

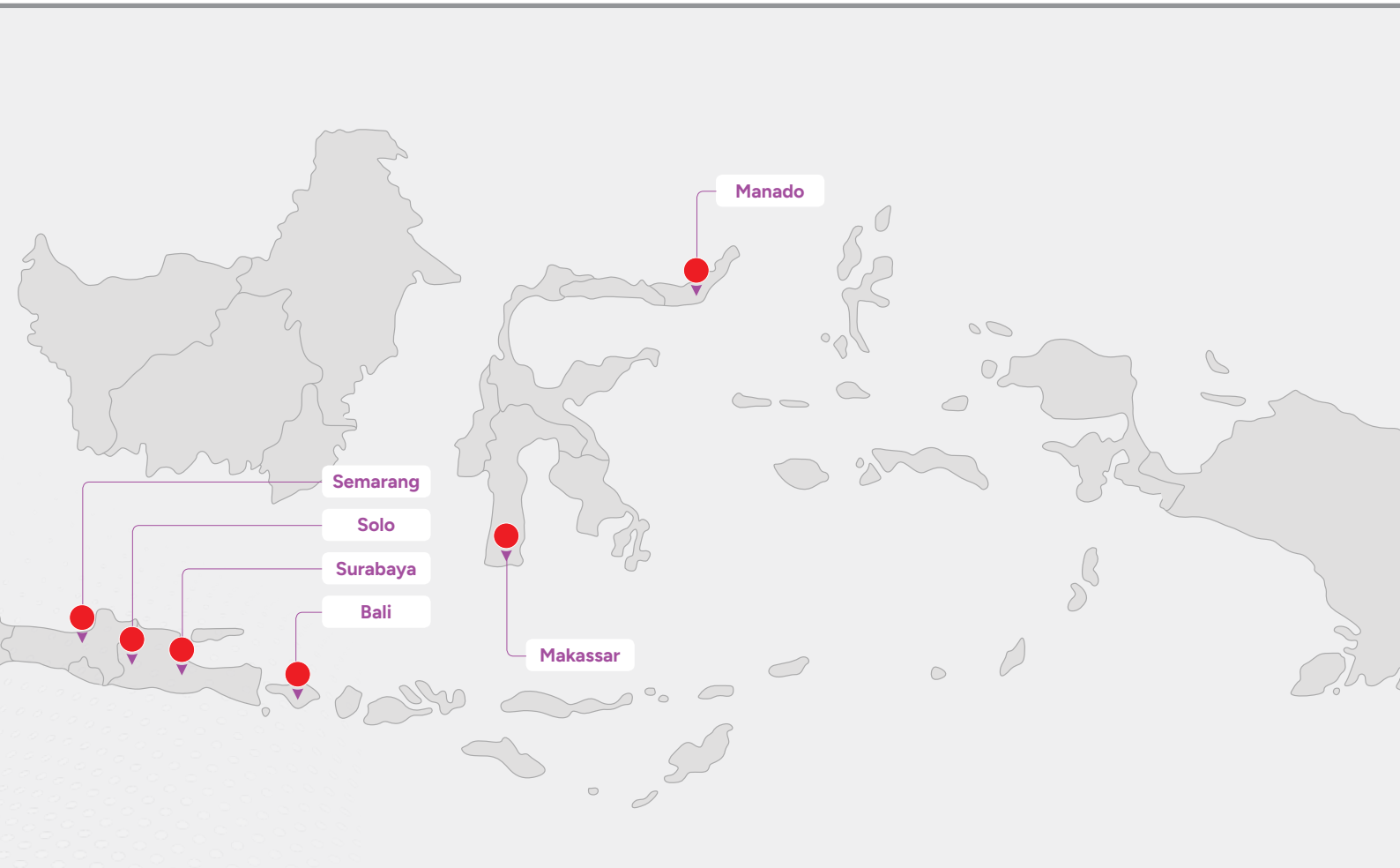


Bank Victoria memiliki jaringan distribusi dan pemasaran yang strategis dan tersebar di 10 (sepuluh) kota besar di Indonesia, yang dirancang untuk meningkatkan aksesibilitas layanan serta mendukung penetrasi pasar secara efektif. Keberadaan jaringan kantor ini menjadi salah satu kekuatan Bank dalam menyediakan produk perbankan yang unggul serta layanan yang andal dan responsif terhadap kebutuhan nasabah di berbagai wilayah. Adapun rincian jaringan kantor Bank Victoria dalam 3 (tiga) tahun terakhir diuraikan sebagai berikut:

Bank Victoria has strategic distribution and marketing networks spread across 10 (ten) major cities in Indonesia, designed to increase service accessibility and support effective market penetration. The existence of this office network serves as one of the Bank's strengths in providing excellent banking products and reliable, responsive services to customer needs in various regions. The details of Bank Victoria's office network over the past 3 (three) years are outlined as follows:

Jaringan Kantor
Office Network

Uraian	2025	2024	2023	Description
Kantor Pusat	**1**	1	1	Head Office
Kantor Cabang Utama	**14**	14	14	Main Branch Office
Kantor Cabang Pembantu	**21**	24	24	Sub-Branch Office
Kantor Fungsional	**1**	-	-	Functional Office
Total	**37**	**39**	**39**	**Total**



Jaringan Kantor per Wilayah Tahun 2025
Office Network by Region in 2025

Wilayah	Kantor Cabang Utama Main Branch Offices	Kantor Cabang Pembantu Sub-Branch Offices	Kantor Fungsional Functional Office	Total	Area
Jakarta Timur	-	-	-	-	East Jakarta
Jakarta Selatan	2	5	-	7	South Jakarta
Jakarta Utara	1	3	-	4	North Jakarta
Jakarta Barat	-	9	-	9	West Jakarta
Jakarta Pusat	2	3	-	5	Central Jakarta
Bekasi, Cibubur, dan sekitarnya	-	-	-	-	Bekasi, Cibubur, and the surrounding
Tangerang dan sekitarnya	-	1	-	1	Tangerang and the surrounding
Cabang Luar Kota	9	-	1	9	Out-of-Town Branch
Total	**14**	**21**	**1**	**35**	**Total**

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

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

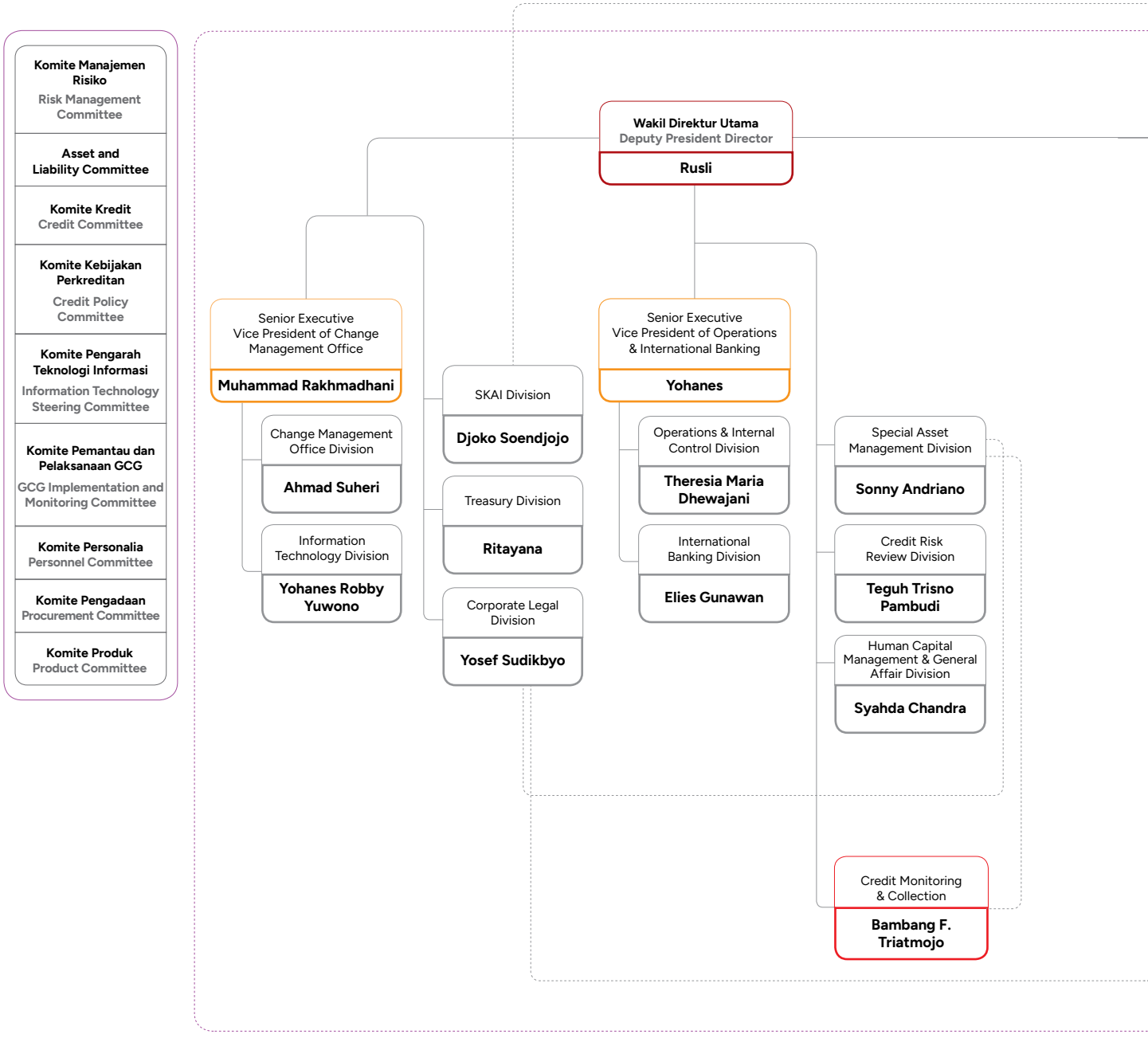
Nama Kantor Name of Office	Alamat Address	No. Telepon dan Fax Telephone No. and Fax
Kantor Pusat Head Office		
Kantor Pusat Head Office	Gedung Graha BIP Lt. 10, Jl. Gatot Subroto Kav. 23, Kel. Karet Semanggi, Kec. Setiabudi, Jakarta Selatan 12930	T : (021) 5228 888 F : (021) 5228 777
Kantor Cabang Utama Main Branch Offices		
BIP	Gedung Graha BIP Lt. Dasar, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930	T : (021) 5258 208 F : (021) 5258 028
Bali	Jl. Raya Imam Bonjol No. 117, Dusun BR. Tenten, Bali 80114	T : (0361) 8451 000 F : (0361) 8451 010
Bandung	Jl. Braga No. 16, Kel. Braga, Kec. Sumur Bandung, Bandung, Jawa Barat 40111	T : (022) 4266 846 F : (022) 4266 845
Bogor	Jl. Pakuan No. 8, Kel. Baranangsiang, Kec. Bogor Timur, Bogor, Jawa Barat 16143	T : (0251) 8343 800 (Hunting) (0251) 8343 804 (0251) 8343 806 (0251) 8343 805 (Direct) F : (0251) 8343 807
Cideng	Jl. Cideng Timur No. 33, Kel. Petojo Utara, Kec. Gambir, Jakarta Pusat 10130	T : (021) 6338 913 F : (021) 6338 914
Fatmawati	Jl. RS Fatmawati No. 85A, Cipete Utara, Kebayoran Baru, Jakarta Selatan 12150	T : (021) 7201 496 F : (021) 7201 497
Kelapa Gading	Jl. Taman Mandiri I No. 8 Kav. A1-B1, Kelapa Gading Timur, Jakarta Utara 14240	T : (021) 4514 012 F : (021) 4514 013
Makassar	Ruko Poros Boulevard/Ruko Emerald No. 16, Jl. Boulevard Masale, Kel. Masale, Kec. Panakukang, Makassar, Sulawesi Selatan 90231	T : (0411) 4093 171 F : (0411) 4093 262
Manado	Jl. Walter Monginsidi Komplek Ruko Bahu Mall Blok E No. 5, Kel. Bahu, Kec. Malalayang, Manado, Sulawesi Utara 95115	T : (0431) 831 431 F : (0431) 831 427
Medan	Jl. Zainal Arifin No. 53C, Kel. Madras Hulu, Kec. Medan Polonia, Medan, Sumatera Utara 20153	T : (061) 8051 0979 F : (061) 4576 274
Semarang	Jl. Raya Pemuda No. 108, Kel. Kembang Sari, Kec. Semarang Tengah, Jawa Tengah 50139	T : (024) 3587 048 F : (024) 3587 049
Senayan	Gedung Bank Panin Senayan Lt. Dasar, Jl. Jenderal Sudirman No. 1, Kel. Gelora, Jakarta Selatan 12710	T : (021) 5735 425 F : (021) 5735 429
Solo	Jl. Brigjen Slamet Riyadi No. 424, Kel. Purwosari, Kec. Laweyan, Surakarta, Jawa Tengah 57142	T : (0271) 722 243 F : (0271) 713 576
Surabaya	Jl. Raya Darmo No. 173, Kel. Darmo, Kec. Wonokromo, Surabaya 60241	T : (031) 5670 778 (Hunting) F : (031) 5670 775

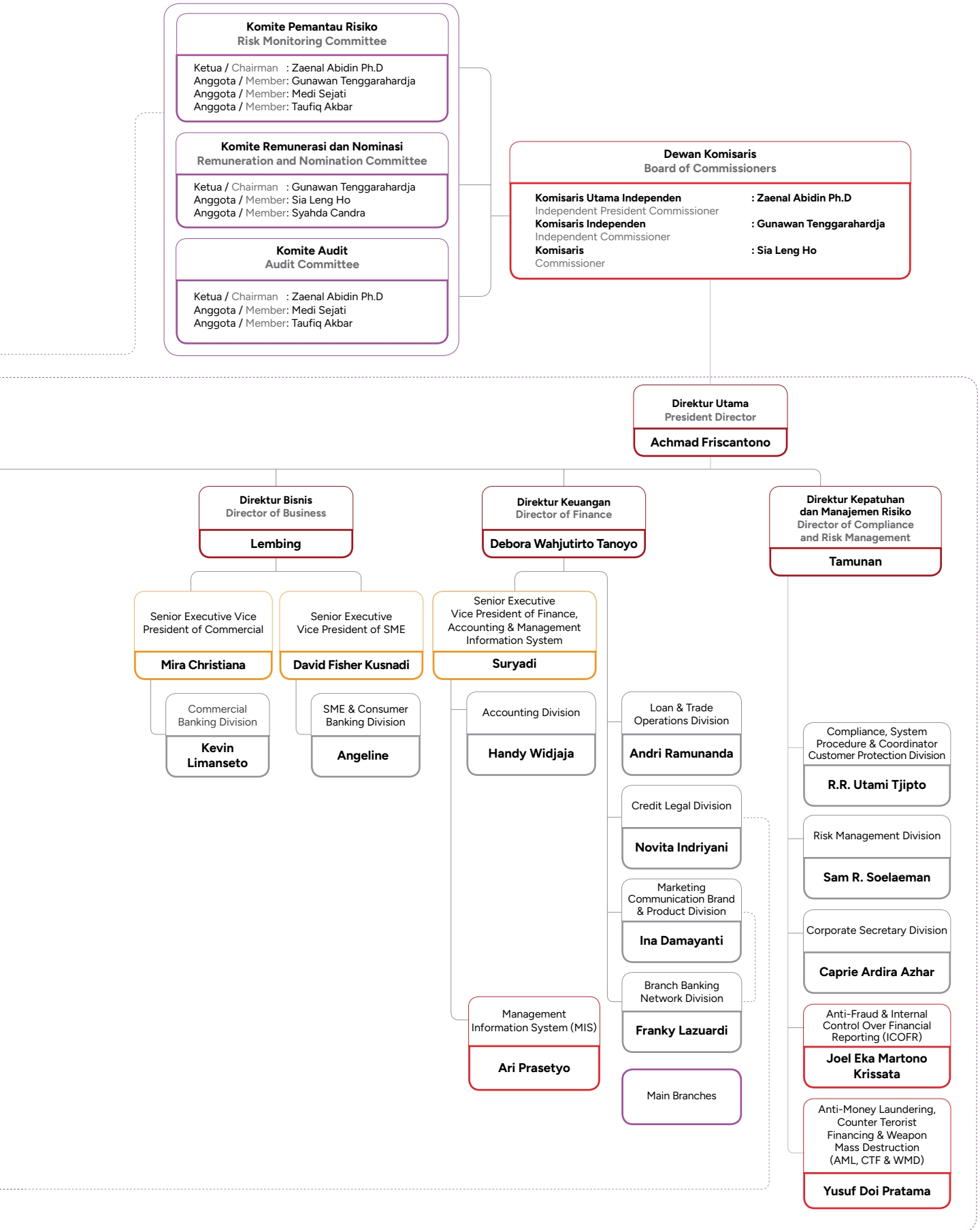
Nama Kantor Name of Office	Alamat Address	No. Telepon dan Fax Telephone No. and Fax
Kantor Cabang Pembantu Sub-Branch Offices		
BSD	Bumi Serpong Damai Sektor IV Blok RE No. 52, Kel. Lengkong Wetan, Kec. Serpong, Tangerang 15318	T : (021) 5315 2783 F : (021) 5315 2785
Central Park	Garden Shopping Arcade B/08/BG, Jl. Tanjung Duren Raya Kav. 5-9, Tanjung Duren, Jakarta Barat 11470	T : (021) 2920 6257 F : (021) 2920 6258
Citra Dua	Rukan Citra Niaga Blok A/5, Kel. Pegadungan, Kec. Kalideres, Jakarta Barat 11830	T : (021) 5437 6656 F : (021) 5437 6695
Duta Mas	Komplek Perumahan Taman Duta Mas Blok D8 No. 12, Kel. Wijaya Kusuma, Kec. Grogol Petamburan, Jakarta Barat 11460	T : (021) 5697 9990 F : (021) 5697 9996
Duta Merlin	Komplek Pertokoan Duta Merlin Blok A No. 10, Jl. Gajah Mada No. 3-5, Kel. Petojo Utara, Kec. Gambir, Jakarta Pusat 10160	T : (021) 6386 5970 F : (021) 6386 5971
Grand Wijaya	Komplek Grand Wijaya Blok C No. 10, Jl. Wijaya II, Kel. Pulo, Kec. Kebayoran Baru, Jakarta Selatan 12160	T : (021) 7200 009 F : (021) 7202 878
Green Garden	Komplek Green Garden Blok A 14 No. 28, Jl. Panjang Kedoya Utara, Kel. Kedoya Utara, Kec. Kebon Jeruk, Jakarta Barat 11520	T : (021) 5835 6803 F : (021) 5835 6844
Kebon Jeruk	Komplek Pertokoan Intercon Blok B No. 4-5, Jl. Meruya Ilir Raya, Kel. Srengseng, Kec. Kembangan, Jakarta Barat 11620	T : (021) 5874 427 F : (021) 5842 379
Kemang	Jl. Kemang Raya No. 82 C, Kel. Bangka, Kec. Mampang Prapatan, Jakarta Selatan 12730	T : (021) 7193 521 F : (021) 7193 721
Mandala Tomang	Lobby Gedung Mandala Airlines, Jl. Tomang Raya No. 33-37, Kel. Tomang, Kec. Grogol Petamburan, Jakarta Barat 11440	T : (021) 5697 2227 F : (021) 5697 2237
Muara Karang 2	Jl. Pluit Karang Utara No. 46 Blok I1 Selatan Kav. 48, Penjaringan, Jakarta Utara 14450	T : (021) 6604 144 F : (021) 6604 116
Pantai Indah Kapuk	Bukit Golf Mediterania Blok B/18, Pantai Indah Kapuk, Kel. Kamal Muara, Kec. Penjaringan, Jakarta Utara 14460	T : (021) 5694 5973 F : (021) 5694 5974
Patal Senayan	Rukan Permata Senayan Blok B No. 6, Jl. Tentara Pelajar, Kel. Grogol Utara, Kec. Kebayoran Lama, Jakarta Selatan 12210	T : (021) 5794 0668 F : (021) 5794 0667
Pecenongan	Jl. Pecenongan Raya No. 26, Kel. Kebon Kelapa, Kec. Gambir, Jakarta Pusat 10120	T : (021) 386 5627 F : (021) 386 5637
Pondok Indah	Plaza Pondok Indah Blok II Blok UPS No. 51, Jl. Metro Pondok Indah, Kel. Pondok Pinang, Kec. Kebayoran Lama, Jakarta Selatan 12310	T : (021) 7591 5628 F : (021) 7591 5625
Puri Indah	Komplek Puri Indah Blok A No. 3, Jl. Puri Indah Raya, Kel. Kembangan Selatan, Kec. Kembangan, Jakarta Barat 11610	T : (021) 582 0216 F : (021) 582 0217
Hangtuah	Jl. Hang Tuah Raya No.4 Lt. 2, Kel. Gunung, Kec. Kebayoran Baru, Jakarta Selatan 12120	T : (021) 2904 4280 F : (021) 2904 4281
Sunter	Komplek Rukan Sunter Permai Blok A-9, Jl. Danau Sunter Utara, Kel. Sunter Agung, Kec. Tanjung Priok, Jakarta Utara 14350	T : (021) 6530 7347 F : (021) 6530 7348
Taman Palem Lestari	Ruko Taman Palem Blok D1 No. 19D, Kel. Cengakareng Barat, Kec. Cengkareng, Jakarta Barat 11730	T : (021) 5596 0771 F : (021) 5596 0772
Wisma Indocement	Wisma Indocement Lt. Dasar, Jl. Jenderal Sudirman Kav 70-71, Kel. Setibudi, Kec. Setiabudi, Jakarta Selatan 12970	T : (021) 5223 765 F : (021) 5223 762
Wisma Slipi	Wisma Slipi Lt. Dasar, Jl. Letnan Jenderal S Parman Kav. 12, Kel. Kemanggisan, Kec. Palmerah, Jakarta Barat 11480	T : (021) 5308 800 F : (021) 5307 207
Kantor Fungsional Functional Office		
Kantor Fungsional Bali Bali Functional Office	Cross Vibe Paasha Atelier Kuta, Bali.	T : (0361) 9598500

Struktur Organisasi
Organization Structure

Pada tahun 2025, Bank Victoria telah melakukan penyempurnaan struktur organisasi sebagai bagian dari upaya strategis untuk memperkuat efektivitas tata kelola dan mendukung pencapaian tujuan serta sasaran Bank. Struktur organisasi Bank Victoria telah disahkan melalui Surat Keputusan Direksi No. 008/SK-DIR/07/25 tanggal 22 Juli 2025 tentang Struktur Organisasi PT Bank Victoria International Tbk, sebagaimana berikut:

In 2025, Bank Victoria refined its organizational structure as part of strategic efforts to strengthen governance effectiveness and support the achievement of the Bank's goals and objectives. Bank Victoria's organizational structure was ratified through the Board of Directors' Decision Letter No. 008/SK-DIR/07/25 dated 22 July 2025 on the Organizational Structure of PT Bank Victoria International Tbk, as follows:




Komite Pemantau Risiko
Risk Monitoring Committee
Ketua / Chairman : Zaenal Abidin Ph.D
Anggota / Member: Gunawan Tenggarahardja
Anggota / Member: Medi Sejati
Anggota / Member: Taufiq Akbar
Komite Remunerasi dan Nominasi
Remuneration and Nomination Committee
Ketua / Chairman : Gunawan Tenggarahardja
Anggota / Member: Sia Leng Ho
Anggota / Member: Syahda Candra
Komite Audit
Audit Committee
Ketua / Chairman : Zaenal Abidin Ph.D
Anggota / Member: Medi Sejati
Anggota / Member: Taufiq Akbar
Dewan Komisaris
Board of Commissioners
Komisaris Utama Independen
Independent President Commissioner
: Zaenal Abidin Ph.D
Komisaris Independen
Independent Commissioner
: Gunawan Tenggarahardja
Komisaris
Commissioner
: Sia Leng Ho
Direktur Utama
President Director
Achmad Friscantono
Direktur Bisnis
Director of Business
Lembing
Direktur Keuangan
Director of Finance
Debora Wahjutirto Tanoyo
Direktur Kepatuhan dan Manajemen Risiko
Director of Compliance and Risk Management
Tamunan
Senior Executive Vice President of Commercial
Mira Christiana
Senior Executive Vice President of SME
David Fisher Kusnadi
Senior Executive Vice President of Finance, Accounting & Management Information System
Suryadi
Commercial Banking Division
Kevin Limanseto
SME & Consumer Banking Division
Angeline
Accounting Division
Handy Widjaja
Loan & Trade Operations Division
Andri Ramunanda
Credit Legal Division
Novita Indriyani
Marketing Communication Brand & Product Division
Ina Damayanti
Branch Banking Network Division
Franky Lazuardi
Main Branches
Management Information System (MIS)
Ari Prasetyo
Compliance, System Procedure & Coordinator Customer Protection Division
R.R. Utami Tjipto
Risk Management Division
Sam R. Soelaeman
Corporate Secretary Division
Caprie Ardira Azhar
Anti-Fraud & Internal Control Over Financial Reporting (ICOFR)
Joel Eka Martono Krissata
Anti-Money Laundering, Counter Terorist Financing & Weapon Mass Destruction (AML, CTF & WMD)
Yusuf Doi Pratama

Daftar Keanggotaan dalam Asosiasi [POJK C.5]

List of Association Membership

Sebagai institusi jasa keuangan, Bank Victoria secara aktif berpartisipasi dalam berbagai asosiasi maupun lembaga yang memiliki relevansi dengan bidang usaha utama Bank. Partisipasi ini memungkinkan Bank untuk tetap terinformasi mengenai perkembangan terkini, isu strategis, serta tren industri, sekaligus mendorong terjadinya pertukaran informasi dan pemberian masukan konstruktif demi kemajuan bersama. Sepanjang tahun 2025, Bank Victoria tercatat sebagai anggota dari beberapa asosiasi, perhimpunan, dan lembaga nasional berikut:

As a financial services institution, Bank Victoria actively participates in various associations and institutions relevant to the Bank's main business areas. This participation allows the Bank to stay informed about the latest developments, strategic issues, and industry trends, while also promoting information exchange and constructive input provision for mutual progress. Throughout 2025, Bank Victoria was registered as a member of national associations, societies, and institutions as follows:

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

Profil Dewan Komisaris
Board of Commissioners Profile

ZAENAL ABIDIN Ph.D

Komisaris Utama Independen
Independent President Commissioner

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Sukabumi

Usia / Age
62 tahun / years old

Domisili / Domicile
Depok



Penilaian Uji Kemampuan dan Kepatutan
Sebagai Komisaris Utama Independen:
Telah lulus *fit and proper test* dari Otoritas Jasa Keuangan tanggal 28 Oktober 2022.
Sebagai Komisaris/Komisaris Independen:
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 27 September 2012.

Fit and Proper Test
As Independent President Commissioner:
Passed the fit and proper test from Financial Services Authority on 28 October 2022.
As Commissioner/Independent Commissioner:
Passed the fit and proper test from Bank Indonesia on 27 September 2012.

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

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

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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
Sebagai Komisaris Utama Independen:
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

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

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

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

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Level 2 Komisaris dari Lembaga Sertifikasi Profesi Perbankan (2021-2025);
- Sertifikasi bidang Manajemen Risiko Utama dari Lembaga Sertifikasi Profesi Pasar Modal (2022-2025);
- Sertifikasi bidang Asesor Kompetensi Level Asesmen/Uji Kompetensi dari Lembaga Sertifikasi Profesi Perbankan (2022-2025);
- Sertifikasi Bidang Pengembangan Sistem Manajemen Risiko dari Lembaga Sertifikasi Profesi Perbankan (2023-2026);
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2025-2028); dan
- Sertifikasi bidang Kepatuhan Subbidang Pengawasan Bank Umum Jenjang Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2025-2028).

Basis of Appointment and Term of Office
As Independent President Commissioner:
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

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

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

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

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

Certification
- Certification in Banking Risk Management Level 2 Commissioner from Banking Profession Certification Institute (2021-2025);
- Certification in Main Risk Management from Capital Market Professional Certification Institute (2022-2025);
- Certification in Competency Assessor Level Assessment/Competency Test from Banking Profession Certification Institute (2022-2025);
- Certification in Risk Management System Development from Banking Profession Certification Institute (2023-2026);
- Certification in Banking Risk Management, Qualification 7 from Banking Profession Certification Institute (2025-2028); and
- Certification in Compliance, Sub-Division Commercial Bank Supervision, Qualification Level 7 from Banking Profession Certification Institute (2025-2028).

GUNAWAN TENGGARAHARDJA

Komisaris Independen
Independent Commissioner

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Malang

Usia / Age
70 tahun / years old

Domisili / Domicile
Jakarta



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

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

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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Luar Biasa tanggal 24 Februari 2003 (periode 2003-2007);
- Keputusan RUPS Luar Biasa tanggal 19 Desember 2007 (periode 2007-2010);
- Keputusan RUPS Tahunan tanggal 25 Juni 2010 (periode 2010-2013);
- Keputusan RUPS Tahunan tanggal 28 Juni 2013 (periode 2013-2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (periode 2016-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (periode 2019-2022);
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

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

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

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

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

Basis of Appointment and Term of Office
- Extraordinary GMS Resolutions dated 24 February 2003 (2003-2007 period);
- Extraordinary GMS Resolutions dated 19 December 2007 (2007-2010 period);
- Annual GMS Resolutions dated 25 June 2010 (2010-2013 period);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016 period);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019 period);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022 period);
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

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

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

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

Certification
Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

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

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

SIA LENG HO

Komisaris
Commissioner

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
66 tahun / years old

Domisili / Domicile
Jakarta



Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Luar Biasa tanggal 19 Oktober 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

Rangkap Jabatan Saat Ini
Di dalam Bank Victoria:
Anggota Komite Remunerasi dan Nominasi Bank Victoria (sejak 2022).
Di luar Bank Victoria:
Komisaris Independen PT Central Proteina Prima Tbk (sejak 2023).

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

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Basis of Appointment and Term of Office
- Extraordinary GMS Resolutions dated 19 October 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

Current Concurrent Positions
In Bank Victoria:
Member of Remuneration and Nomination Committee of Bank Victoria (since 2022).
Outside of Bank Victoria:
Independent Commissioner of PT Central Proteina Prima Tbk (since 2023).

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

Certification
Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

Fit and Proper Test
Passed the fit and proper test from Financial Services Authority on 28 October 2002.

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

Share Ownership of Bank Victoria
None.

Perubahan Komposisi Anggota Dewan Komisaris dan Alasan Perubahannya

Sepanjang tahun 2025, tidak terdapat perubahan komposisi anggota Dewan Komisaris Bank Victoria, namun terdapat pengangkatan kembali anggota Dewan Komisaris yang telah habis masa jabatannya, sebagaimana tertuang dalam keputusan RUPS Tahunan tanggal 20 Juni 2025.

Changes in the Composition of Board of Commissioners Members and the Reasons of Changes

Throughout 2025, there were no changes to the composition of the Board of Commissioners of Bank Victoria, but there were reappointments of members of the Board of Commissioners whose terms of office ended, as stated in the resolution of the Annual GMS on 20 June 2025.

Profil Direksi
Board of Directors Profile

ACHMAD FRISCANTONO
Direktur Utama
President Director



Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
San Francisco

Usia / Age
64 tahun / years old

Domisili / Domicile
Jakarta

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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

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

Riwayat Jabatan Sebelumnya
- *Dealer Senior (Senior Assistant Manager)* Divisi *Treasury* PT Bank Internasional Indonesia Tbk, Jakarta (1990-1994);
- Kepala *Dealer (Manager)* Divisi Treasury PT Bank Namura Internusa, Jakarta (1994-1996);
- Kepala *Treasury (Senior Manager)* Divisi *Treasury & International* PT Bank Rama Tbk, Jakarta (1996-2000);
- Pemimpin Tim *Treasury*/ALM/*International*, Proyek Merger PT Bank Danamon Indonesia Tbk, Jakarta (1999-2000);
- Wakil Kepala Divisi (*Assistant Vice President*) Divisi Risiko Kredit dan Risiko Pasar PT Bank Danamon Indonesia Tbk, Jakarta (2000-2004);
- Kepala Risiko Likuiditas (*Senior Assistant Vice President*) Divisi Risiko Pasar dan Risiko Likuiditas PT Bank Danamon Indonesia Tbk, Jakarta (2004-2006);
- Kepala Divisi *Treasury (Vice President)* PT Bank Tabungan Pensiunan Nasional Tbk, Jakarta (2006-2008);
- Kepala Divisi *Treasury, Financial Institution & Consumer Finance (Senior Vice President)* PT Bank Tabungan Pensiunan Nasional Tbk, Jakarta (2008-2014);
- Kepala Divisi *Treasury & Financial Institution (Executive Vice President)* PT Bank Tabungan Pensiunan Nasional Tbk, Jakarta (2014-2016);
- Direktur Eksekutif Perbanas (Perhimpunan Bank Nasional), Jakarta (2017-2021); dan
- Komisaris Utama PT Bank Victoria Syariah, Jakarta (2019-2022).

Sertifikasi
- Sertifikasi bidang Treasuri Jenjang 7 dari ACI Financial Markets Association Indonesia (2023-2026);
- Sertifikasi bidang *Workplace Asesssment* Kualifikasi Asesor Kompetensi dari Badan Nasional Sertifikasi Profesional (2023-2026); dan
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

Current Concurrent Positions
In Bank Victoria:
None.
Outside of Bank Victoria:
None.

History of Previous Positions
- Senior Dealer (Senior Assistant Manager) Treasury Divison PT Bank Internasional Indonesia Tbk, Jakarta (1990-1994);
- Chief Dealer (Manager) Treasury Divison PT Bank Namura Internusa, Jakarta (1994-1996);
- Treasury Head (Senior Manager) Treasury & International Divison PT Bank Rama Tbk, Jakarta (1996-2000);
- Team Leader of Treasury/ALM/International, Merger Project PT Bank Danamon Indonesia Tbk, Jakarta (1999-2000);
- Deputy Division Head (Assistant Vice President) Credit & Market Risk Division PT Bank Danamon Indonesia Tbk, Jakarta (2000-2004);
- Liquidity Risk Head (Senior Assistant Vice President) Market & Liquidity Risk Division PT Bank Danamon Indonesia Tbk, Jakarta (2004-2006);
- Treasury Division Head (Vice President) PT Bank Tabungan Pensiunan Nasional Tbk, Jakarta (2006-2008);
- Treasury, Financial Institution & Consumer Finance Division Head (Senior Vice President) PT Bank Tabungan Pensiunan Nasional Tbk, Jakarta (2008-2014);
- Treasury & Financial Institution Division Head (Executive Vice President) PT Bank Tabungan Pensiunan Nasional Tbk, Jakarta (2014-2016);
- Executive Director Perbanas (Perhimpunan Bank Nasional), Jakarta (2017-2021); and
- President Commissioner PT Bank Victoria Syariah, Jakarta (2019-2022).

Certification
- Certification in Treasury Level 7 from ACI Financial Markets Association Indonesia (2023-2026);
- Certification in Workplace Assessment Competency Assessor Qualification from the National Professional Certification Agency (2023-2026); and
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

Fit and Proper Test
Passed the fit and proper test from Financial Services Authority on 19 October 2022.

RUSLI

Wakil Direktur Utama
Deputy President Director

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Tebing Tinggi

Usia / Age
54 tahun / years old

Domisili / Domicile
Jakarta



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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Luar Biasa tanggal 29 Februari 2016 (periode 2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (periode 2016-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (periode 2019-2022);
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

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

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027); dan
- Sertifikasi bidang Treasuri Jenjang 7 dari ACI Financial Markets Association Indonesia (2024-2027).

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

Basis of Appointment and Term of Office
- Extraordinary GMS Resolutions dated 29 February 2016 (2016 period);
- Annual GMS Resolutions dated 24 June 2016 (2016-2019 period);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022 period);
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

Current Concurrent Positions
In Bank Victoria:
None.
Outside of Bank Victoria:
None.

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

Certification
- Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027); and
- Certification in Treasury Level 7 from ACI Financial Markets Association Indonesia (2024-2027).

Fit and Proper Test
Passed the fit and proper test from Financial Services Authority on 16 September 2016.

LEMBING

Direktur Bisnis
Director of Business

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Pekanbaru

Usia / Age
61 tahun / years old

Domisili / Domicile
Jakarta



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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 18 Mei 2018 (periode 2018-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (periode 2019-2022);
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

Riwayat Pendidikan
Sarjana Ekonomi dari Universitas Tarumanegara (1989).

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

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

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 18 May 2018 (2018-2019 period);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022 period);
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

Education
Bachelor of Economic from Tarumanegara University (1989).

Current Concurrent Positions
In Bank Victoria:
None.
Outside of Bank Victoria:
None.

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

Certification
Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

Fit and Proper Test
Passed the fit and proper test from Financial Services Authority on 30 October 2018.

DEBORA WAHJUTIRTO TANOYO

Direktur Keuangan
Director of Finance

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Surabaya

Usia / Age
40 tahun / years old

Domisili / Domicile
Jakarta



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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 18 Mei 2018 (periode 2018-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (periode 2019-2022);
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

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

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

Sertifikasi
Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

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

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 18 May 2018 (2018-2019 period);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022 period);
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

Current Concurrent Positions
In Bank Victoria:
None.
Outside of Bank Victoria:
None.

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

Certification
Certification in Banking Risk Management Qualification 7 from Banking Profession Certification Institution (2024-2027).

Fit and Proper Test
Passed the fit and proper test from Financial Services Authority on 22 November 2018.

TAMUNAN

Direktur Kepatuhan dan Manajemen Risiko
Director of Compliance and Risk Management

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Banjarmasin

Usia / Age
60 tahun / years old

Domisili / Domicile
Jakarta



Penilaian Uji Kemampuan dan Kepatutan
Telah lulus *fit and proper test* dari Bank Indonesia tanggal 17 Maret 2008.

Fit and Proper Test
Passed the fit and proper test from Bank Indonesia on 17 March 2008.

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

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

Kepemilikan Saham Bank Victoria
Tidak ada.

Share Ownership of Bank Victoria
None.

Dasar Pengangkatan dan Periode Menjabat
- Keputusan RUPS Tahunan tanggal 27 Juni 2008 (periode 2008-2010);
- Keputusan RUPS Tahunan tanggal 25 Juni 2010 (periode 2010-2013);
- Keputusan RUPS Tahunan tanggal 28 Juni 2013 (periode 2013-2016);
- Keputusan RUPS Tahunan tanggal 24 Juni 2016 (periode 2016-2019);
- Keputusan RUPS Tahunan tanggal 10 Mei 2019 (periode 2019-2022);
- Keputusan RUPS Tahunan tanggal 3 Juni 2022 (periode 2022-2025); dan
- Keputusan RUPS Tahunan tanggal 20 Juni 2025 (periode 2025-2028).

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

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

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

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Kualifikasi Jenjang 7 dari Lembaga Sertifikasi Profesi Perbankan (2023-2026);
- Sertifikasi bidang *Treasury Dealer Level Advance* dari Lembaga Sertifikasi Profesi Perbankan (2024-2027);
- Sertifikasi bidang Anti-Pencucian Uang dan Pencegahan Pendanaan Terorisme Kualifikasi Jenjang 7 (APU-PPT) (2025-2028); dan
- Sertifikasi bidang Kepatuhan Sub-Bidang Pengelolaan Bank Umum Jenjang Kualifikasi 7 dari Lembaga Sertifikasi Profesi Perbankan (2025-2028).

Basis of Appointment and Term of Office
- Annual GMS Resolutions dated 27 June 2008 (2018-2010 period);
- Annual GMS Resolutions dated 25 June 2010 (2010-2013 period);
- Annual GMS Resolutions dated 28 June 2013 (2013-2016 period);
- Annual GMS Resolution dated 24 June 2016 (2016-2019 period);
- Annual GMS Resolutions dated 10 May 2019 (2019-2022 period);
- Annual GMS Resolutions dated 3 June 2022 (2022-2025 period); and
- Annual GMS Resolutions dated 20 June 2025 (2025-2028 period).

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

Current Concurrent Positions
In Bank Victoria:
None.
Outside of Bank Victoria:
None.

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

Certification
- Certification in Banking Risk Management Qualification Level 7 from Banking Profession Certification Institution (2023-2026);
- Certification in Treasury Dealer Level Advance from Banking Profession Certification Institute (2024-2027);
- Certification in Anti-Money Laundering and Counter-Terrorist Financing Qualification Level 7 (AML-CTF) (2025-2028); and
- Certification in Compliance, Sub-Division Commercial Bank Management, Qualification Level 7 from Banking Profession Certification Institute (2025-2028).

Perubahan Komposisi Anggota Direksi dan Alasan Perubahannya

Sepanjang tahun 2025, tidak terdapat perubahan komposisi anggota Direksi Bank Victoria, namun terdapat pengangkatan kembali anggota Direksi yang telah habis masa jabatannya, sebagaimana tertuang dalam keputusan RUPS Tahunan 20 Juni 2025.

Changes in the Composition of Board of Directors Members and the Reasons of Changes

Throughout 2025, there were no changes to the composition of the Board of Directors of Bank Victoria, but there were reappointments of members of the Board of Directors whose terms of office ended, as stated in the resolution of the Annual GMS on 20 June 2025.

Pejabat Eksekutif
Executive Officer

Susunan Pejabat Eksekutif Bank Victoria per 31 Desember 2025 diuraikan sebagai berikut:

The composition of Bank Victoria's Executive Officers as of 31 December 2025 is described as follows:

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

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

Materi Material	Penyelenggara Organizer
Sharing Session "Suistainable Growth Through Digitalization and Strong Governance"	Bank Victoria
***Training IBM Tech Innovation Experience Artificial Intelligence* (AI) dalam Aksi: Produktivitas AI dan Otomatisi Teknologi Informasi (TI)** Training IBM Tech Innovation Experience Artificial Intelligence (AI) in Action: AI Productivity and Information Technology (IT) Automation	Infobank
***Training Refreshment Financial Integrity Rating* (FIR) 2025 dan Tindak Pidana Pencucian Uang Pidana Pencucian Uang** Training Refreshment Financial Integrity Rating (FIR) 2025 and Money Laundering Crimes	Andara Sarana
Training* Bahaya Pinjaman *Online Training on the Dangers of Online Loans	Bank Victoria
Training Building a Fraud-Resilent Bank: from Detection to Response	Victoria Institute
***Training* untuk Pekerjaan *Security Elastic Security Information and Event Management* (SIEM)** Job Training for Security Elastic Security Information and Event Management (SIEM)	FAN Integrasi Teknologi
***Training: Expert Sharing Session* "Transformasi Digital IT Perbankan"** Training: Expert Sharing Session: "Digital Transformation of Banking IT"	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
***Training* Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi** Training on Strategy and Implementation of Consumer and Personal Data Protection	Victoria Institute
SMF Housing Finance Outlook* 2025: *Strenghtening the Housing Sector Through Diverse Innovative Funding	Sarana Multigriya Financial
Ujian Sertifikasi Manajemen Risiko Jenjang 7 Examination of Risk Management Certification Level 7	Lembaga Sertifikasi Profesi Perbankan Banking Professional Certification Institute
***Training* Pembekalan Manajemen Risiko Jenjang 7** Briefing Training on Risk Management Level 7	Arfaidhams Secret
Team Building: "Work Hard Vacation Harder"	Victoria Institute
***Training* Pelatihan Berbasis Kompetensi Sistem Pembayaran dan Pengelolaan Uang Rupiah (PBK SPPUR) "Pengelolaan Transfer Dana" Jenjang 6** Competency-Based Training for Payment System and Rupiah Currency Management (PBK SPPUR) "Fund Transfer Management" Level 6	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
***Focus Group Discussion* Perayaan Hari Jadi Asosiasi Sistem Pembayaran Indonesia** Focus Group Discussion on Celebrating the Anniversary of the Indonesian Payment System Association	Asosiasi Sistem Pembayaran Indonesia Indonesian Payment System Association
***Sharing Session*: Koordinasi Kepala Operasional** Sharing Session: Coordination with Head of Operations	Victoria Institute
***Refreshment* Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR) "Pengelolaan Transfer Dana" Jenjang 6** Refreshment of Payment System and Rupiah Currency Management (SPPUR) "Fund Transfer Management" Level 6	Lembaga Sertifikasi Profesi Sistem Pembayaran Indonesia Indonesian Payment System Professional Certification Institute
Training Talkshow Women's Leadership	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
Team Building: "Work Life Balance"	Bank Victoria
Team Building: "One Team, Endless Possibilities"	Bank Victoria
Training Chief Financial Officer (CFO) Forum "Navigating Uncertainty: Seizing Banking Resilience and Growth in Volatile Times"	Perhimpunan Bank-Bank Nasional Association of National Banks

Materi Material	Penyelenggara Organizer
Innovative Credit Scoring **dalam Meningkatkan Kualitas dan Inklusi Kredit dan Pengembangan** ***Model Credit Scoring*** **untuk Konsumen Asuransi Jiwa** Innovative Credit Scoring in Improving Credit Quality and Inclusion and Developing Model Credit Scoring for Consumers Life Insurance	Otoritas Jasa Keuangan Financial Services Authority
Training Trade Finance	Victoria Institute
Training Refreshment **Manajemen Risiko Jenjang 6** Training Refreshment of Risk Management Level 6	Arfaidhams Secret
Training Driving Branch Productivity Through Effective Leadership	Edcore Indonesia
Refreshment **Sertifikasi** ***Treasury*** **Jenjang 7** Refreshment of Treasury Certification Level 7	ACI Financial Markets Association
Training Refreshment **Manajemen Risiko Jenjang 5** Training Refreshment of Risk Management Level 5	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
Training Idea Talks Riset **OJK Institute** ***Volume*** **8 Tahun 2025** Training Idea Talks of OJK Institute Research Volume 8 of 2025	Otoritas Jasa Keuangan Financial Services Authority
Webinar "Memutus Mata Rantai ***Scam*****: Sinergi dan Strategi Perlindungan Konsumen Sektor Keuangan"** Webinar "Breaking the Chain of Scams: Synergy and Consumer Protection Strategy in the Financial Sector"	OJK Institute
Uji Sertifikasi Manager Sumber Daya Manusia Certification Test of Human Resources Manager	Lembaga Sertifikasi Profesi Manajemen Sumber Daya Manusia Professional Certification Institute for Human Resource Management
Training Human Capital Beyond & Summit (IHCBS)	QuBisa
Team Building: "Together We Grow, Together We Go"	Bank Victoria
Training Indonesia Marketing Convention	MarkPlus
Webinar "*How to Achieve a Peak Performance in* **2025"** Webinar "How to Achieve a Peak Performance in 2025"	OJK Institute
Sosialisasi ***Potential Risk Detection System*** **(PRDS), Fitur** ***Quick Response Code Indonesian Standard*** **(QRIS)** ***Tap Near Field Communication*** **(NFC) dan Diskusi Panel:** ***sharing*** **Penanganan Keluhan Nasabah Terkait** ***Fraud*** Dissemination of Potential Risk Detection System (PRDS), feature of Quick Response Code Indonesian Standard (QRIS) Tap Near Field Communication (NFC), and Panel Discussion: Sharing on Handling Customer Complaints Related to Fraud	PT Rintis Sejahtera Prima Network
Rapat Jaringan Prima Prima Network Meeting	Prima
Refreshment **Cakupan Pelindungan Konsumen Bank Indonesia dan Rencana Penguatan Kapasitas Industri dalam Praktik Pelindungan Konsumen** Refreshment on Bank Indonesia's Consumer Protection Coverage and Plans to Strengthen Industry Capacity in Consumer Protection Practices	Asosiasi Sistem Pembayaran Indonesia Indonesian Payment System Association
Webinar "Waspada SMS ***Phishing*** **(SMISHING) Mengatasnamakan Penyedia Jasa Pembayaran"** Webinar "Beware of SMS Phishing (SMISHING) Impersonating Payment Service Providers"	Departemen Surveilans Sistem Pembayaran dan Pelindungan Konsumen - Grup Pelindungan Konsumen Department of Payment System Surveillance and Consumer Protection – Consumer Protection Group
Training **Aplikasi Rekap Pajak Revamp** Training on Revamped Tax Recap Application	Bank Victoria
Training **Aplikasi Verifikasi Pengambilan Kartu ATM Tabungan T19** Training on ATM Savings Card Retrieval Verification Application T19	Bank Victoria

Materi Material	Penyelenggara Organizer
Training Refreshment **Identifikasi Dokumen (Fisik dan Digital) dan Pemeriksaan Keaslian Mata Uang Kertas (Rupiah dan Valas)** Training Refreshment on (Physical and Digital) Document Identification and Authenticity Check of Paper Currency (Rupiah and Forex)	Andara Sarana
Training **Peningkatan Fungsi Pengendalian Internal Bank** Training on Improving Bank Internal Control Functions	Andara Sarana
Training **Program Perlindungan Konsumen dan Masyarakat di Sektor Keuangan: Menurut Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023** Training on Consumer and Community Protection Programs in Financial Sector: According to Financial Services Authority Regulation No. 22 of 2023	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
Training **Aplikasi *Virtual Account*** Training on Virtual Account Application	Bank Victoria
Training **Tuntas Penyelenggaraan Rapat Umum Pemegang Saham dan Likuidasi dalam Praktek untuk Perseroan Terbatas Tertutup** Complete Training on Holding General Meetings of Shareholders and Liquidation in Practice for Private Limited Companies	Ikatan Notaris Indonesia Indonesian Notary Association
Kupas Tuntas Prosedur *Spin Off* (Pemisahan), *Inberg, Merger*, dan Akuisisi Perseroan Terbatas Complete Analysis of the Procedures for Spin-Off (Separation), Inberg, Merger, and Acquisition for Limited Liability Companies	Ikatan Notaris Indonesia Indonesian Notary Association
Sosialisasi Pedoman Akses Pelayanan Keuangan untuk Disabilitas Berdaya (Pedoman SETARA) Dissemination of Guidelines for Access to Financial Services for Empowered Persons with Disabilities (SETARA Guidelines)	Otoritas Jasa Keuangan Financial Services Authority
Training Compliance Champion	Bank Victoria
Pembekalan Sertifikasi Kompetensi Kepatuhan Jenjang 6 Briefing of Compliance Competency Certification Level 6	Forum Komunikasi Direktur Kepatuhan Perbankan Banking Compliance Directors Communication Forum
Training Internal Liquidity Adequacy Assessment Process (ILAAP)	Manaek Robert L. Toruan
Training IT Risk Management	Acumen Advice Training & Consulting
Asesmen Sidik Jari PRiADI Pegawai Bank Victoria PRiADI Fingerprint Assessment for Bank Victoria Employees	PRiADI
Team Building: "Victoria Challege Camp"	Bank Victoria
Training **Dasar-Dasar Reksadana** Mutual Fund Basics Training	Batavia Prosperindo Aset Manajemen Batavia Prosperindo Aset Manajemen
Training **Pendidikan Profesi Lanjutan Wakil Agen Penjual Efek Reksa Dana (WAPERD)** Training of Advance Professional Education for Representatives of Mutual Fund Selling Agent (WAPERD)	Asosiasi Pelaku Reksa Dana & Investasi Indonesia Indonesian Mutual Fund and Investment Association
Training Experiential Emotional Branding	Markplus
Training Digital Marketing "Marketeers Tech For Business"	Markplus
Sharing Discussion Preparation ISO 20022 Society for Worldwide Interbank Financial Telecommunication (SWIFT)	Asosiasi SWIFT Indonesia
Training Identifying Risk & Preventing Fraud In International Trade Heavily Based on Real Life IMB Case Studies	International Chamber of Commerce
Training **Perdagangan Berjangka Komoditi, Resi Gudang, dan Aset Kripto** Training on Commodity Futures Trading, Warehouse Receipts, and Crypto Assets	Asosiasi Perdagangan Berjangka Komoditi Indonesia Indonesian Commodity Futures Trading Association
Focus Group Discussion SMF Fixed-Income Securities Outlook 2026	Sarana Multigriya Finansial
Training Security Table Top	SecurXcess

Materi Material	Penyelenggara Organizer
Perpanjangan Keanggotaan Afiliasi Affiliate Membership Renewal	Association of Certified Fraud Examiners
***Workshop* Identifikasi Transaksi Keuangan Mencurigakan dan Penentuan Indikasi Tindak Pidanan Asal** Workshop on Identifying Suspicious Financial Transaction and Determining Indications of Predicate Crimes	Forum Komunikasi Direktur Kepatuhan Perbankan Banking Compliance Directors Communication Forum
***Training* Pembekalan Anti-Pencucian Uang-Pencegahan Pendanaan Terorisme (APU–PPT) Jenjang 6** Training on Anti-Money Laundering-Counter-Terrorist Financing (AML-CTF) Level 6	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
Ujian Sertifikasi Anti-Pencucian Uang-Pencegahan Pendanaan Terorisme (APU–PPT) Jenjang 6 Certification Examination of Anti-Money Laundering-Counter Terrorist Financing (AML-CTF) Level 6	Lembaga Sertifikasi Profesi Perbankan Banking Professional Certification Institute
Team Building: "Victoria Challege Camp"	Bank Vcitoria
Webinar Peningkatan *Awareness* terhadap Risiko Tindak Pidana terkait *Investment Fraud* dan *Green Financial Crime* Webinar on Increasing Awareness of Criminal Risks related to Investment Fraud and Green Financial Crime	Anti-Pencucian Uang dan Pencegahan Pendanaan Terorisme Otoritas Jasa Keuangan Anti-Money Laundering and Counter-Terrorism Financing, Financial Services Authority
***Training* Penerapan *Internal Control over Financial Reporting* (ICoFR) untuk Meningkatkan Integritas Laporan Keuangan dan Kepercayaan Publik** Training on the Implementation of Internal Control over Financial Reporting (ICoFR) to Improve Financial Statements' Integrity and Public Confidence	Lembaga Pengembangan Perbankan Indonesia Indonesian Institute for Banking Development
Training National Anti Fraud Conference 2025	Association of Certified Fraud Examiners
Training Leading Gen Z: Dealing with Mental Health @Work	Next Leader
***Workshop* Pelaporan Rencana Kegiatan Literasi dan Inklusi Keuangan melalui Sistem SiPEDULI** Workshop on Reporting Financial Literacy and Inclusion Activity Plans through SiPEDULI System	Otoritas Jasa Keuangan Financial Services Authority
Sosialisasi Bulan Inklusi Keuangan 2025 Dissemination on Financial Inclusion Month 2025	Otoritas Jasa Keuangan Financial Services Authority
Sosialisasi Bulan Literasi Keuangan Tahun 2025 Dissemination on Financial Literacy Month 2025	Otoritas Jasa Keuangan Financial Services Authority

Profil Kepala Kantor Cabang Utama
Profile of Main Branch Office Head

Jane Alexandra Herman
Pemimpin Kantor Cabang Utama BIP
Head of BIP Main Branch Office

Nerly Sugianto
Pemimpin Kantor Cabang Utama Senayan
Head of Senayan Main Branch Office

Amelia
Pemimpin Kantor Cabang Utama Cideng
Head of Cideng Main Branch Office

Rosina
Pemimpin Kantor Cabang Utama Kelapa Gading 1
Head of Kelapa Gading 1 Main Branch Office

Rosita B. Rajaisun
Pemimpin Kantor Cabang Utama Bogor
Head of Bogor Main Branch Office

Erli Nornawati
Pemimpin Kantor Cabang Utama Surabaya
Head of Surabaya Main Branch Office

Tjioe Dedy Himawan
Pemimpin Kantor Cabang Utama Semarang
Head of Semarang Main Branch Office

Wiwi Candra
Pemimpin Kantor Cabang Utama Medan
Head of Medan Main Branch Office

Febyra Asia Rini
Pemimpin Kantor Cabang Utama Solo
Head of Solo Main Branch Office

Daisy Merry Natalia
Pemimpin Kantor Cabang Utama Manado
Head of Manado Main Branch Office

I Gusti Putu Sridana Sastrawan
Pemimpin KCU Bali
Head of Bali Main Branch Office

Sandra Martiana Sari
Pemimpin Kantor Cabang Utama Bandung
Head of Bandung Main Branch Office

Kinanti Gusti Putri
Pemimpin Kantor Cabang Utama Fatmawati
Head of Fatmawati Main Branch Office

Tony Utomo
Pemimpin Kantor Cabang Utama Makassar
Head of Makassar Main Branch Office

Komposisi Pemegang Saham [POJK C.3]
Shareholders Composition

Komposisi Pemegang Saham Perseroan pada awal dan akhir tahun diungkapkan secara transparan sesuai dengan prinsip keterbukaan informasi sebagaimana disajikan dalam tabel berikut:

The composition of the Company's Shareholders at the beginning and end of the year is disclosed transparently in accordance with the principle of information transparency, as presented in the following table:

Uraian Description	31 Desember 2025 31 December 2025			1 Januari 2025 1 January 2025		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)
Saham dengan Sertifikat Kolektif **Shares with Collective Certificates**						
Pemegang Saham Pendiri Founders Shares	-	-	-	-	-	-
Masyarakat Public						
Pemodal Nasional National Investor						
5% atau lebih **5% or more**	-	-	-	-	-	-
Lainnya Others	**1,165,500**	**0.01**	**116,550,000**	1,165,500	0.01	116,550,000
Pemodal Asing Foreign Investors						
5% atau lebih **5% or more**	-	-	-	-	-	-

Uraian Description	31 Desember 2025 31 December 2025			1 Januari 2025 1 January 2025		
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total (Rp)
Lainnya Others	**24,500**	**0.00**	**2,450,000**	24,500	0.00	2,450,000
Sub Total	**1,190,000**	**0.01**	**119,000,000**	**1,190,000**	**0.01**	**119,000,000**
Saham dengan Penitipan Kolektif PT Kustodian Sentral Efek Indonesia Shares in Collective Custody with PT Kustodian Sentral Efek Indonesia						
Pemegang Saham Pendiri Founders Shares						
PT Nata Patindo	-	-	-	48,823,665	0.31	4,882,366,500
Masyarakat Public						
Pemodal Nasional National Investor						
5% atau lebih **5% or more**						
Suzanna Tanojo	**1,163,587,703**	**6.32**	**116,358,770,300**	3,066,411,303	19.35	306,641,130,300
PT Victoria Investama Tbk	**11,082,071,942**	**60.17**	**1,108,207,194,200**	7,010,537,747	44.23	701,053,774,700
Lainnya Others	**2,371,366,489**	**12.87**	**237,136,648,900**	3,491,811,401	22.03	349,181,140,100
Pemodal Asing Foreign Investors						
5% atau lebih **5% or more**						
Chemical Asia Corporation Pte Ltd	**1,958,234,404**	**10.63**	**195,823,440,400**	-	-	-
Lainnya Others	**1,842,968,290**	**10.01**	**184,296,829,000**	2,229,758,790	14.07	222,975,879,000
Sub Total	**18,418,228,828**	**99.99**	**1,841,822,882,800**	**15,847,342,906**	**99.99**	**1,584,734,290,600**
Total	**18,419,418,828**	**100.00**	**1,841,941,882,800**	**15,848,532,906**	**100.00**	**1,584,853,290,600**

Komposisi Pemegang Saham yang Memiliki 5% atau Lebih Saham

Composition of Shareholders with 5% or More Shares

Uraian Description	31 Desember 2025 31 December 2025		1 Januari 2025 1 January 2025	
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)
PT Victoria Investama Tbk	**11,082,071,942**	**60.17**	7,010,537,747	44.23
Suzanna Tanojo	**1,163,587,703**	**6.32**	3,066,411,303	19.35
Chemical Asia Corporation Pte Ltd	**1,958,234,404**	**10.63**	-	-
Total	**14,203,894,049**	**77.11**	**10,076,949,050**	**63.58**

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

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

Sepanjang tahun 2025, tidak terdapat anggota Dewan Komisaris maupun anggota Direksi yang tercatat sebagai Pemegang Saham Bank Victoria, baik secara langsung maupun tidak langsung. Hal ini mencerminkan pemisahan yang jelas antara fungsi kepengurusan dan kepemilikan, serta merupakan bentuk komitmen Bank terhadap penerapan prinsip tata kelola perusahaan yang baik, khususnya dalam hal transparansi dan pencegahan potensi benturan kepentingan.

Throughout 2025, there were no members of Board of Commissioners or members of Board of Directors listed as Shareholders of Bank Victoria, either directly or indirectly. This reflected a clear separation between management and ownership functions and demonstrated the Bank's commitment to implementing good corporate governance principles, particularly with regard to transparency and preventing potential conflicts of interest.

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

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

Uraian	31 Desember 2025 31 December 2025		1 Januari 2025 1 January 2025		Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	
Pemodal Nasional National Investors					
Perorangan	**1,218,333,393**	**6.60**	1,319,317,235	8.32	Individuals
Perseroan Terbatas	**1,144,849,316**	**6.22**	1,634,441,754	10.31	Limited Liability Companies
Asuransi	**88,000**	**0.00**	164,920,000	1.04	Insurance
Reksa Dana	**15,000**	**0.00**	915,000	0.01	Mutual Funds
Broker	**9,246,280**	**0.05**	422,206,577	2.66	Broker
Pemodal Asing Foreign Investors					
Perorangan	**581,538,815**	**3.16**	242,031,715	1.53	Individuals
Institusi Asing	**1,261,453,975**	**6.85**	1,987,751,575	12.54	Foreign Institutions
Total	**4,215,524,779**	**22.88**	**5,771,583,856**	**36.42**	**Total**

Komposisi Pemegang Saham berdasarkan Status Kepemilikan

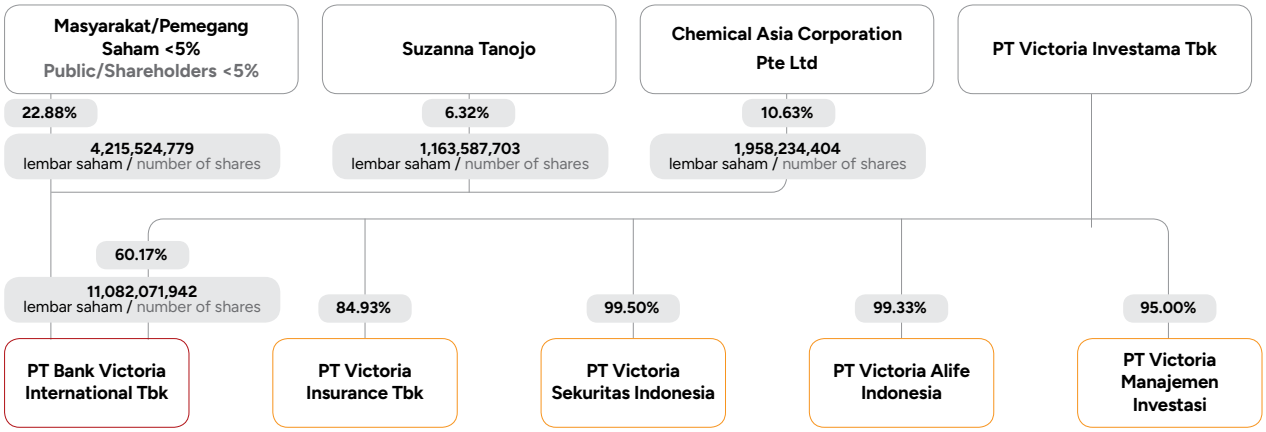
Shareholders Composition by Ownership Status

Uraian	31 Desember 2025 31 December 2025			1 Januari 2025 1 January 2025			Description
	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	Total Saham (Lembar Saham) Total Shares (Number of Shares)	Kepemilikan Saham Share Ownership (%)	Total Investor	
SCRIPTLESS							
Pemodal Nasional							National Investors
Perorangan	**2,380,859,096**	**12.93**	**7,565**	4,384,666,538	27.67	7,137	Individuals
Perseroan Terbatas	**12,226,920,758**	**66.38**	**22**	8,644,979,001	54.55	32	Limited Liability Companies
Broker	**9,246,280**	**0.05**	**5**	422,206,577	2.66	6	Broker
Mutual Fund	-	-	-	900,000	0.01	1	Mutual Fund
Asuransi	-	-	-	164,832,000	1.04	2	Insurance
Pemodal Asing							Foreign Investors
Perorangan	**581,514,315**	**3.16**	**9**	242,007,215	1.53	10	Individual
Institusi Asing	**3,219,688,379**	**17.48**	**25**	1,987,751,575	12.54	18	Foreign Institutions
SCRIPT							
Pemodal Nasional							National Investors
Perorangan	**1,062,000**	**0.01**	**132**	1,062,000	0.01	132	Individuals
Perseroan Terbatas	**500**	**0.00**	**1**	500	0.00	1	Limited Liability Companies
Reksa Dana	**15,000**	**0.00**	**1**	15,000	0.00	1	Mutual Fund
Asuransi	**88,000**	**0.00**	**3**	88,000	0.00	3	Insurance
Pemodal Asing							Foreign Investors
Perorangan	**24,500**	**0.00**	**7**	24,500	0.00	7	Individual
Institusi Asing	-	-	-	-	-	-	Foreign Institutions
Total	**18,419,418,828**	**100.00**	**7,770**	**15,848,532,906**	**100.00**	**7,350**	**Total**

Struktur Pemegang Saham Utama dan Pengendali
Main and Controlling Shareholders Structure

Pada akhir tahun 2025, sebanyak 60,17% saham Bank Victoria dimiliki oleh PT Victoria Investama Tbk. Kepemilikan mayoritas ini menempatkan PT Victoria Investama Tbk sebagai Pemegang Saham Utama sekaligus Pemegang Saham Pengendali Bank. Sedangkan penerima manfaat akhir individu dari kepemilikan saham Bank Victoria adalah Suzanna Tanojo, sebagaimana diuraikan dalam struktur berikut:

At the end of 2025, 60.17% of Bank Victoria's shares were owned by PT Victoria Investama Tbk. This majority ownership positioned PT Victoria Investama Tbk as the Bank's Main Shareholder and Controlling Shareholder. The ultimate individual beneficiary of Bank Victoria's share ownership was Suzanna Tanojo, as outlined in the following structure:



Informasi Entitas Anak, Perusahaan Asosiasi, Perusahaan Ventura Bersama, dan *Special Purpose Vehicle*
Information on Subsidiaries, Associated Entities, Joint Venture Companies, and Special Purpose Vehicles

Per 31 Desember 2025, Bank Victoria tidak memiliki Entitas Anak, perusahaan ventura bersama, maupun *special purpose vehicle* yang menjadi bagian dari struktur grup usaha. Namun demikian, Bank memiliki 1 (satu) Entitas Asosiasi yang memberikan kontribusi terhadap kegiatan usaha Bank melalui hubungan kepemilikan strategis. Keberadaan Entitas Asosiasi ini mencerminkan upaya Bank dalam menjalin kemitraan yang sinergis guna mendukung pertumbuhan bisnis secara berkelanjutan. Informasi lebih lanjut mengenai Entitas Asosiasi yang dimiliki oleh Bank Victoria diuraikan sebagai berikut:

At 31 December 2025, Bank Victoria did not have any Subsidiary, joint venture company, or special purpose vehicle within its business group structure. Nevertheless, the Bank had 1 (one) Associated Entity that contributed to its business activities through strategic ownership relationships. The existence of this Associated Entity reflected the Bank's efforts to establish synergistic partnerships to support sustainable business growth. Further information regarding Bank Victoria's Associated Entity is outlined below:

PT Bank Victoria Syariah*	
Alamat Address	**Gedung Graha BIP Lt. 5** **Jl. Gatot Subroto Kav. 23 Karet Semanggi, Setiabudi** **Jakarta Selatan 12930** **T : (021) 5600 467** **(021) 5225 285 (Hunting)** **F : (021) 5664 247** **E : corsec@bankvictoriasyariah.co.id** **W : www.bankvictoriasyariah.co.id**
Bidang Usaha Line of Business	**Perbankan Syariah** Sharia Banking
Tahun Beroperasi Year of Operations	**Beroperasi sejak 1966** Has been in operation since 1966
Domisili Domicile	**Jakarta**

* PT Bank Victoria International Tbk telah mendivestasikan seluruh kepemilikan sahamnya pada PT Bank Victoria Syariah efektif 5 Juni 2025, sehingga entitas tersebut tidak lagi menjadi Entitas Asosiasi Bank Victoria. / PT Bank Victoria International Tbk divested all of its shares in PT Bank Victoria Syariah effective as of 5 June 2025, therefore, the entity is no longer an Associated Entity of Bank Victoria.

Kronologi Pencatatan Saham
Chronology of Share Listing

Sejak melaksanakan Penawaran Umum Perdana Saham (*Initial Public Offering*/IPO) pada tahun 1999, Bank Victoria telah melalui sejumlah tahap penting dalam perjalanan pencatatan sahamnya di Bursa Efek Indonesia. Bank Victoria terus berupaya menjaga kepatuhan terhadap ketentuan pasar modal serta memastikan keterbukaan informasi kepada seluruh pemangku kepentingan. Kronologis lengkap terkait pencatatan saham Bank hingga akhir tahun 2025, disajikan secara rinci pada tabel berikut:

Since its Initial Public Offering (IPO) in 1999, Bank Victoria has gone through several important stages in its journey to listing its shares on Indonesia Stock Exchange. Bank Victoria continuously strives to maintain compliance with capital market regulations and ensure information transparency to all stakeholders. A complete chronology of the Bank's share listing through the end of 2025 is presented in detail in the following table:

Uraian Description	**Tahun Pelaksanaan** Exercise Year	**Total Saham yang Diterbitkan (Lembar Saham)** Total Issued Shares (Number of Shares)	**Nilai Nominal** Nominal Value **(Rp)**	**Harga Penawaran** Offering Price **(Rp)**	**Total Saham Beredar (Lembar Saham)** Total Outstanding Shares (Number of Shares)
Saham Pendiri Founders' Shares		250,000,000	100	-	250,000,000
Saham dari Kapitalisasi Saldo Laba Shares from Capitalization of Retained Earnings		34,000,000	100	-	284,000,000
Penawaran Umum Perdana Saham Initial Public Offering	1999	250,000,000	100	100	534,000,000
Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering I with Preemptive Rights	2000	100,000,000	100	115	634,000,000
Pelaksanaan Waran Seri I dan II Exercise of Series I and II Warrants	2002	66,793,400	100	-	700,793,400
Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering II with Preemptive Rights	2003	400,000,000	100	100	1,100,793,400

Uraian Description	Tahun Pelaksanaan Exercise Year	Total Saham yang Diterbitkan (Lembar Saham) Total Issued Shares (Number of Shares)	Nilai Nominal Nominal Value (Rp)	Harga Penawaran Offering Price (Rp)	Total Saham Beredar (Lembar Saham) Total Outstanding Shares (Number of Shares)
Pelaksanaan Waran Seri III Exercise of Series III Warrants	2004	193,799,960	100	-	1,294,593,360
Pelaksanaan Waran Seri III Exercise of Series III Warrants	2006	46,200,000	100	-	1,340,793,360
Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering III with Preemptive Rights	2006	670,363,760	100	100	2,011,157,120
Pelaksanaan Waran Seri IV Exercise of Series IV Warrants	2007	323,840,000	100	100	2,334,997,120
Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering IV with Preemptive Rights	2008	1,167,498,560	100	100	3,502,495,680
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2009	344,244,500	100	100	3,846,740,180
Pelaksanaan Waran Seri IV dan V Exercise of Series IV and V Warrants	2010	249,707,135	100	100	4,096,447,315
Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu Limited Public Offering V with Preemptive Rights	2011	1,954,919,259	100	100	6,051,366,574
Penerbitan Saham tanpa Hak Memesan Efek Terlebih Dahulu Limited Public Offering without Preemptive Rights	2011	414,580,000	100	100	6,465,946,574
Pelaksanaan Waran Seri IV dan VI Exercise of Series IV and VI Warrants	2011	81,724,314	100	100	6,547,670,888
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2012	56,673,554	100	100	6,604,344,442
Pelaksanaan Waran Seri V dan VI Exercise of Series V and VI Warrants	2013	25,923,831	100	100	6,630,268,273
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2014	508,898,707	100	100	7,139,166,980
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2015	300	100	100	7,139,167,280
Pelaksanaan Waran Seri VI Exercise of Series VI Warrants	2016	751,486,547	100	100	7,890,653,827
Penambahan Modal tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase without Preemptive Rights	2016	780,394,335	100	100	8,671,048,162
Penambahan Modal tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase without Preemptive Rights	2019	280,898,877	100	356	8,951,947,039
Penambahan Modal tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase without Preemptive Rights	2021	586,205,939	100	160	9,538,152,978
Penambahan Modal tanpa Hak Memesan Efek Terlebih Dahulu Capital Increase without Preemptive Rights	2021	948,979,590	100	196	10,487,132,568
Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu Capital Increase with Preemptive Rights	2022	2,553,461,919	100	150	13,040,594,487
Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu Capital Increase with Preemptive Rights	2022	2,807,640,227	100	150	15,848,234,714
Pelaksanaan Waran Seri VII Exercise of Series VII Warrants	2023	1,064	100	100	15,848,235,778
Pelaksanaan Waran Seri VII Exercise of Series VII Warrants	2024	297,128	100	100	15,848,532,906
Pelaksanaan Waran Seri VII Exercise of Series VII Warrants	2025	2,570,885,922	100	100	18,419,418,828
Total Modal Saham yang Ditempatkan dan Disetor Penuh Total Issued and Fully Paid Share Capital					**18,419,418,828**

Kronologi Pencatatan Efek Lainnya
Chronology of Other Securities Listing

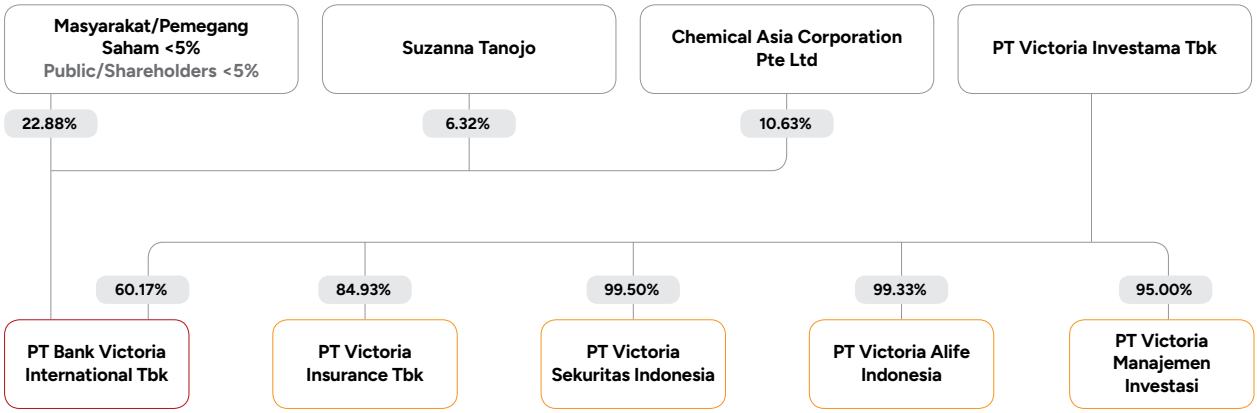
Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi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

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Bond I Phase I of 2017 at fixed interest rate	300,000	5	10.30	11 Juli 2017- 11 Juli 2022 11 July 2017- 11 July 2022	idA- (Single A Minus)	idA- (Single A Minus)	√	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase I of 2017 at fixed interest rate	50,000	7	11.00	11 Juli 2017- 11 Juli 2024 11 July 2017- 11 July 2024	idBBB (Triple B)	idBBB (Triple B)	√	
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri A Bank Victoria Series A Continuous Bond I Phase II of 2018 at fixed interest rate	100,000	3	9.70	5 Juni 2018- 5 Juni 2021 5 June 2018- 5 June 2021	idA- (Single A Minus)	idA- (Single A Minus)	√	
Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Seri B Bank Victoria Series B Continuous Bond I Phase II of 2018 at fixed interest rate	200,000	5	10.30	5 Juni 2018- 5 Juni 2023 5 June 2018- 5 June 2023	idA- (Single A Minus)	idA- (Single A Minus)	√	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dengan tingkat suku bunga tetap Bank Victoria Continuous Subordinated Bond I Phase II of 2018 at fixed interest rate	350,000	7	11.00	5 Juni 2018- 5 Juni 2025 5 June 2018- 5 June 2025	idBBB (Triple B)	idBBB (Triple B)	√	
Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Bonds II Phase I Year 2019	100,000	2	9.75	28 Juni 2019- 28 Juni 2021 28 June 2019- 28 June 2021	idA- (Single A Minus)	idA- (Single A Minus)	√	
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase I Year 2019	250,000	7	11.75	28 Juni 2019- 28 Juni 2026 28 June 2019- 28 June 2026	idBBB (Triple B)	idBBB (Triple B)		√
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 Bank Victoria Continuing Subordination Bonds II Phase II Year 2019	150,000	7	11.25	8 November 2019- 8 November 2026	idBBB (Triple B)	idBBB (Triple B)		√

Uraian Description	Total (Juta Rupiah) Total (Million Rupiah)	Tenor (Tahun) Tenure (Year)	Tingkat Suku Bunga Interest Rates (%)	Tanggal Date	Peringkat Saat Diterbitkan Ratings at Issuance	Peringkat Terakhir Latest Ratings	Status Pembayaran Payment Status	
							Lunas Paid	Belum Lunas Not Paid
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 Bank Victoria Continuing Subordination Bonds II Phase III Year 2020	60,000	7	11.25	1 April 2020- 1 April 2027	idBBB (Triple B)	idBBB (Triple B)		√
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri A Bank Victoria Series A Continuing Bonds III Phase I Year 2023 at fixed interest rate	300,000	3	9.25	9 Maret 2023- 9 Maret 2026 9 March 2023- 9 March 2026	idA- (Single A Minus)	idA- (Single A Minus)		√
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 dengan tingkat bunga tetap Seri B Bank Victoria Series B Continuing Bonds III Phase I Year 2023 at fixed interest rate	200,000	5	10.25	9 Maret 2023- 9 Maret 2028 9 March 2023- 9 March 2028	idA- (Single A Minus)	idA- (Single A Minus)		√
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 Bank Victoria Continuous Subordinated Bonds III Phase I Year 2024	500,000	5	10.75	12 Juli 2024- 12 Juli 2029 12 July 2024- 12 July 2029	idBBB (Triple B)	idBBB (Triple B)		√
Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 Bank Victoria Continuing Bonds III Phase II Year 2024	500,000	3	9.50	12 Juli 2024- 12 Juli 2027 12 July 2024- 12 July 2027	idA- (Single A Minus)	idA- (Single A Minus)		√
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025	500,000	5	10.00	18 Juni 2025- 18 Juni 2030 18 June 2025- 18 June 2030	idBBB (Triple B)	idBBB (Triple B)		√
Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 Bank Victoria Continuing Bonds IV Phase I Year 2025	750,000	3	9.00	4 Juli 2025- 4 Juli 2028 4 July 2025- 4 July 2028	idA- (Single A Minus)	idA- (Single A Minus)		√
Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 Bank Victoria Continuing Bonds IV Phase II Year 2025	750,000	3	8.25	26 September 2025- 26 September 2028	idA- (Single A Minus)	idA- (Single A Minus)		√

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

Struktur Grup
Group Structure



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

Nama Kantor Akuntan Publik **Name of Public Accounting Firm**	Kantor Akuntan Publik Purwanto Susanti & Surja Purwanto Susanti & Surja Public Accounting Firm
Jaringan/Asosiasi/Aliansi **Network/Association/Alliance**	Member of Ernst & Young
Alamat **Address**	Indonesia Stock Exchange Building Tower 2 Lt. 7 Jl. Jenderal Sudirman Kav. 52-53, Jakarta 12190 T : (021) 5289 5000 F : (021) 5289 4100
Nama Akuntan Publik **Name of Public Accountant**	Yovita
Periode Penugasan **Assignment Period**	2025
Jasa Audit **Audit Services**	Audit Laporan Keuangan tahun buku 2025. Audit of Financial Statements for the 2025 fiscal year.
Jasa Non Audit **Non-Audit Services**	-
Biaya Jasa Audit **Audit Service Fee**	Rp2,275,500,000,-
Biaya Jasa Non Audit **Non-Audit Services Fee**	-

Lembaga dan Profesi Penunjang Pasar Modal
Capital Market Supporting Institutions and Professionals

Uraian Description	Nama Name	Alamat Address	Jasa yang Diberikan Services Provided	Biaya Jasa Services Fee (Rp)
Biro Administrasi Efek Share Registrar Bureau	**PT Adimitra Jasa Korpora**	Rukan Kirana Boutique Office Jl. Kirana Avenue III Blok F3 No. 5 Kelapa Gading Jakarta Utara 14250 T : (021) 2974 5222 F : (021) 2928 9961 E : opr@adimitra-jk.co.id W : www.adimitrajk.co.id	Jasa Administrasi Daftar Pemegang Saham dan Administrasi Waran No. PW-145/BVIC/092022 dan No. AF088/BVIC/032023. Shareholder Registration and Warrant Administration Services No. PW-145/BVIC/092022 and No. AF088/BVIC/032023.	51,080,000
Pencatatan Efek Securities Listing	**Bursa Efek Indonesia** **Indonesia Stock Exchange**	Indonesia Stock Exchange Building Tower I Jl. Jenderal Sudirman Kav. 52-53 Jakarta Selatan 12190 T : (021) 5150 515 F : (021) 5150 330 W : www.idx.co.id	Pencatatan Tahunan Saham dan/atau Efek Bersifat Utang dan Sukuk. Annual Listing of Shares and/or Debt Securities and Sukuk.	565,545,000
Notaris Notary	**Fathiah Helmi, SH**	Graha Irama Lt. 6C Jl. HR Rasuna Said Kav. 1-2 Jakarta 12950 T : (021) 5290 7304 (021) 5290 7305 (021) 5290 7306 F : (021) 5261 136 E : fhchozie@gmail.com	Pembuatan Akta Berita Acara dan Akta Pernyataan Keputusan RUPS Tahunan. Preparation of Deed of Minutes and Deed of Statement of Annual GMS Resolutions.	35,520,000
Perusahaan Pemeringkat Efek Securities Rating Agency	**PT Pemeringkat Efek Indonesia**	Equity Tower Lt. 30 Sudirman Central Business District Lot. 9 Jl. Jenderal Sudirman Kav. 52-53 Jakarta 12190 T : (021) 5096 8469 F : (021) 5096 8468 W : www.pefindo.com	• Pemeringkatan atas Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025; • Pemeringkatan atas Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025; • Pemeringkatan atas Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025; dan • Pemeringkatan Tahunan Perusahaan, Obligasi, dan Obligasi Subordinasi Bank Victoria. • Rating of Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025; • Rating of Bank Victoria Sustainable Bonds IV Phase I Year 2025; • Rating of Bank Victoria Sustainable Bonds IV Phase II Year 2025; and • Bank Victoria's Annual Rating of the Company, Bonds, and Subordinated Bond.	1,748,250,000
Wali Amanat Trustee	**PT Bank Mega Tbk**	Menara Bank Mega Jl. Kapten Tendean No. 12-12A Jakarta 12970 T : (021) 7917 5000 F : (021) 7918 7100 W : www.bankmega.com	Jasa Tahunan Wali Amanat atas Obligasi dan Obligasi Subordinasi Bank. Annual Trustee Service on the Bank's Bonds and Subordinated Bonds.	549,450,000

Analisis dan Pembahasan Manajemen

Management Discussion and Analysis



04.



Tinjauan Ekonomi dan Industri
Economic and Industrial Overview

Perekonomian Global dan Nasional

Ketegangan geopolitik global masih berlanjut, ditandai dengan konflik Rusia–Ukraina yang belum mereda serta meningkatnya eskalasi di Timur Tengah seiring intensitas serangan Israel terhadap Palestina. Di sisi ekonomi, kebijakan proteksionisme Amerika Serikat pada 2 April 2025 melalui penerapan tarif impor universal sebesar 10% dan tarif resiprokal tinggi kepada 57 negara mitra dagang, termasuk Tiongkok, Kanada, Meksiko, dan Uni Eropa, memicu respons berupa tarif balasan dari sejumlah negara tersebut, sehingga memperburuk tensi perang dagang global. Kombinasi perang dagang dan ketegangan geopolitik tersebut meningkatkan ketidakpastian di pasar keuangan global serta menekan kepercayaan pelaku usaha dan investor. Dampaknya tercermin pada perlambatan pertumbuhan ekonomi global dan meningkatnya fragmentasi antarnegara.

Selain itu, kebijakan tarif tersebut turut menurunkan volume dan nilai perdagangan internasional serta memperparah gangguan rantai pasok yang telah berlangsung sejak 2024. Secara keseluruhan, pertumbuhan ekonomi global dinyatakan melambat menjadi 3,3% pada 2025. Di sisi lain, kebijakan tarif juga mendorong kenaikan harga emas serta berbagai komoditas pangan dan jasa. Tekanan tersebut, ditambah dengan kenaikan upah akibat kebijakan imigrasi di Amerika Serikat, menyebabkan laju penurunan inflasi global berjalan lebih lambat dari perkiraan, dengan inflasi mencapai 3,9% pada tahun 2025.

Di negara maju, perekonomian Amerika Serikat menunjukkan perlambatan, sementara pemulihan ekonomi Uni Eropa masih berlangsung. Perekonomian Amerika Serikat diperkirakan tumbuh 2,2% pada tahun 2025, melambat dari 2,8% pada tahun 2024. Pertumbuhan tersebut didukung oleh investasi di sektor teknologi, meskipun tekanan eksternal meningkat akibat penurunan impor yang tidak diimbangi oleh akselerasi ekspor. Kondisi ini turut menahan laju penurunan inflasi, dengan inflasi tercatat mencapai 2,6% pada tahun 2025. Sementara itu, pemulihan ekonomi Uni Eropa terus berlanjut dengan pertumbuhan ekonomi yang mencapai 1,3% pada tahun 2025. Kinerja tersebut didukung oleh perbaikan konsumsi seiring pelonggaran kebijakan moneter dan stimulus fiskal, serta peningkatan ekspor di awal periode sebagai antisipasi dinamika perdagangan dengan Amerika Serikat. Inflasi di kawasan ini juga menunjukkan tren penurunan hingga mencapai 2,0% pada tahun 2025. Sedangkan di Tiongkok, pertumbuhan

Global and National Economy

The tensions in global geopolitics continued, marked by the ongoing Russia-Ukraine conflict and increasing escalation in the Middle East alongside the intensity of Israeli's attacks on Palestine. Economically, the United States' protectionist policy on 2 April 2025 through the implementation of a universal 10% import tariff and high reciprocal tariffs on 57 trading partners, including China, Canada, Mexico, and the European Union, triggered retaliatory tariffs from a number of these countries, thereby exacerbating the global trade war tensions. The combination of trade war and geopolitical tensions increased uncertainty in global financial markets and undermined the confidence of business owners and investor. The impacts were reflected in slowing global economic growth and increasing fragmentation between countries.

Furthermore, these tariff policies reduced the volume and value of international trade and exacerbated supply chain disruptions that started since 2024. Overall, global economic growth was projected to slow to 3.3% in 2025. Furthermore, these tariff policies also drove up the prices of gold, various food commodities, and services. Such pressures, coupled with rising wages due to immigration policies in the United States, caused global inflation to decline more slowly than expected, reaching 3.9% in 2025.

In developed countries, the United States' economy slowed down, while the European Union's economy was still recovering. The United States economy was projected to grow 2.2% in 2025, slowing from 2.8% in 2024. This growth was supported by investment in technology sector, though external pressures increased due to a decline in imports that was not offset by an acceleration in exports. This condition also helped restrain the rate of inflation decline, with inflation recorded at 2.6% in 2025. Meanwhile, the European Union's economic recovery continued, with economic growth reaching 1.3% in 2025. This performance was supported by improved consumption in line with monetary policy easing and fiscal stimulus, as well as increased exports at the beginning of the period in anticipation of trade dynamics with the United States. Inflation in the region also showed a downward trend, reaching 2.0% in 2025. Meanwhile, in China, economic growth slowed down from 5.0% in 2024 to 4.4% in 2025.

ekonomi tercatat melambat dari 5,0% pada tahun 2024 menjadi 4,4% pada tahun 2025. Yang dipengaruhi oleh tingginya tarif Amerika Serikat sehingga menekan kinerja ekspor, kecuali pada komoditas berbasis teknologi informasi yang tetap kuat didukung adopsi teknologi dan *Artificial Intelligence* (AI) serta stimulus pemerintah.

Kontras dengan kondisi perekonomian global yang diliputi ketidakpastian, perekonomian Indonesia tetap menunjukkan fundamental yang kuat dan tingkat resiliensi yang terjaga. Pada tahun 2025, pertumbuhan ekonomi tercatat sebesar 5,39% (*year-on-year*), dengan nilai Produk Domestik Bruto (PDB) atas dasar harga berlaku mencapai Rp23.821,1 triliun dan PDB per kapita sebesar Rp83,7 juta. Kinerja ini didorong oleh kuatnya permintaan domestik, peningkatan investasi, efektivitas belanja Pemerintah, stabilitas kinerja ekspor, serta dukungan likuiditas melalui penempatan kas negara pada perbankan komersial.

Dari sisi pengeluaran, seluruh komponen mencatat pertumbuhan positif, dengan Pembentukan Modal Tetap Bruto (PMTB) sebagai kontributor utama yang tumbuh sebesar 6,12%, diikuti oleh Pengeluaran Konsumsi Lembaga Nonprofit yang Melayani Rumah Tangga (PK-LNPRT) sebesar 5,90% dan Pengeluaran Konsumsi Rumah Tangga (PK-RT) sebesar 5,11%. Kondisi ini mencerminkan terjaganya daya beli masyarakat, seiring meningkatnya mobilitas serta inflasi yang tetap terkendali pada level 2,92%. Dari sisi produksi, sektor manufaktur menunjukkan kinerja yang ekspansif dengan pertumbuhan sebesar 5,40%, sejalan dengan *Purchasing Managers' Index* (PMI) Manufaktur yang konsisten berada pada fase ekspansi. Kinerja ini didukung oleh kuatnya permintaan domestik serta pemulihan permintaan global, khususnya pada subsektor strategis berbasis hilirisasi dan penguatan daya saing industri.

Sejalan dengan hal tersebut, kinerja sektor eksternal juga mencatat capaian yang solid, tercermin dari surplus neraca perdagangan kumulatif sebesar USD41,05 miliar. Nilai ekspor mencapai USD282,91 miliar atau tumbuh 6,15%, melampaui impor sebesar USD241,86 miliar yang meningkat 2,83%. Selain itu, akselerasi digitalisasi sistem pembayaran yang berkembang pesat turut menjadi faktor pendorong penting dalam memperkuat pertumbuhan ekonomi yang inklusif.

Sumber:
- Bank Indonesia, "Laporan Perekonomian Indonesia 2025";
- Badan Pusat Statistik, "Pertumbuhan Ekonomi Indonesia Triwulan IV-2025 BRS No. 18/02/Th. XXIX, 5 Februari 2026";
- Siaran Pers Kementerian Keuangan Republik Indonesia, "Ekonomi Indonesia 2025 Kuat, Didorong Tingginya Investasi dan Ekspor serta Akselerasi Belanja Pemerintah";
- Badan Pusat Statistik, "Perkembangan Indeks Harga Konsumen Desember 2025 BRS No. 01/01/Th. XXIX, 5 Januari 2026"; dan
- Badan Pusat Statistik, "Perkembangan Ekspor dan Impor Indonesia Desember 2025 BRS No. 12/02/Th. XXIX, 2 Februari 2026".

This was influenced by high US tariffs, which depressed export performance, except for information technology-based commodities that remained strong, supported by the adoption of technology and Artificial Intelligence (AI) and government stimulus.

In contrast to the uncertain global economic conditions, Indonesia's economy continued to demonstrate strong fundamentals and maintained resilience. In 2025, economic growth was recorded at 5.39% (year-on-year), with Gross Domestic Product (GDP) at current prices reaching Rp23,821.1 trillion and GDP per capita reaching Rp83.7 million. This performance was driven by strong domestic demand, increased investment, effective government spending, stable export performance, and liquidity support through state cash placements in commercial banks.

In terms of expenditure, all components recorded positive growth, with Gross Fixed Capital Formation (PMTB) as the main contributor, growing by 6.12%, followed by Consumption Expenditure of Non-Profit Institutions Serving Households (PK-LNPRT) at 5.90% and Household Consumption Expenditure (PK-RT) at 5.11%. This condition reflected maintained public purchasing power, along with increased mobility and controlled inflation at 2.92%. In terms of production, manufacturing sector demonstrated expansive performance, growing by 5.40%, in line with the Manufacturing Purchasing Managers' Index (PMI), which consistently remained in an expansionary phase. This performance was supported by strong domestic demand and recovery in global demand, particularly in strategic subsectors based on downstream processing and strengthening industrial competitiveness.

In line with these matters, external sector also recorded solid performance, reflected in a cumulative trade balance surplus of USD41.05 billion. Exports reached USD282.91 billion, growing by 6.15%, surpassing imports of USD241.86 billion, which increased by 2.83%. Furthermore, the rapid acceleration of digitalization in payment systems also became a key driving factor in strengthening inclusive economic growth.

Source:
- Bank Indonesia, "Indonesia Economic Report 2025";
- Statistics Indonesia, "Indonesia's Economic Growth Quarter IV-2025 BRS No. 18/02/Th. XXIX, 5 February 2026";
- Press Release of the Ministry of Finance of the Republic of Indonesia, "Indonesia's Strong Economy in 2025, Driven by High Investment and Exports and Accelerated Government Spending";
- Statistics Indonesia, "Development of Consumer Price Index, December 2025, BRS No. 01/01/Th. XXIX, January 5, 2026"; and
- Statistics Indonesia, "Development of Indonesia's Exports and Imports, December 2025, BRS No. 12/02/Th. XXIX, 2 February 2026."

Tinjauan Pasar Keuangan dan Industri Perbankan

Kinerja industri perbankan Indonesia sepanjang tahun 2025 tetap menunjukkan kondisi yang sangat solid dan resilien, tercermin dari fungsi intermediasi yang terus menguat, likuiditas yang memadai, serta profil risiko yang tetap terjaga dengan baik. Hingga Desember 2025, penyaluran kredit mencatat pertumbuhan yang positif sebesar 9,46% (*year-on-year*), mencapai Rp8.693,97 triliun. Berdasarkan jenis penggunaan, pertumbuhan kredit didorong terutama oleh Kredit Investasi yang tumbuh signifikan sebesar 20,81%, diikuti oleh Kredit Konsumsi sebesar 6,58% dan Kredit Modal Kerja sebesar 4,52%.

Di sisi penghimpunan dana, Dana Pihak Ketiga (DPK) menunjukkan pertumbuhan yang kuat sebesar 13,83% (*year-on-year*), dengan total mencapai Rp10.057,54 triliun. Pertumbuhan ini didukung oleh kinerja positif pada seluruh instrumen simpanan, di mana giro tumbuh sebesar 19,13%, deposito sebesar 14,28%, dan tabungan sebesar 8,19%. Komposisi ini mencerminkan meningkatnya aktivitas ekonomi serta kepercayaan masyarakat terhadap sistem perbankan, sekaligus memberikan ruang likuiditas yang cukup untuk mendukung ekspansi kredit.

Likuiditas industri perbankan tetap berada pada level yang sangat memadai, tercermin dari rasio Alat Likuid terhadap *Non-Core Deposit* (AL/NCD) sebesar 126,15% dan rasio Alat Likuid terhadap Dana Pihak Ketiga (AL/DPK) sebesar 28,57%, yang secara signifikan berada di atas ambang batas yang ditetapkan. Selain itu, *Liquidity Coverage Ratio* (LCR) yang mencapai 200,97% menunjukkan kemampuan perbankan dalam memenuhi kebutuhan likuiditas jangka pendek, sekaligus memperkuat ketahanan sektor keuangan terhadap potensi tekanan eksternal.

Dari sisi profitabilitas, industri perbankan tetap mencatat kinerja yang stabil dengan *Return on Assets* (ROA) sebesar 2,53%, sedikit meningkat dibandingkan periode sebelumnya. Sementara itu, rasio permodalan (*Capital Adequacy Ratio*/ CAR) yang tetap tinggi pada level 25,89% mencerminkan kapasitas perbankan yang kuat dalam menyerap potensi risiko serta mendukung ekspansi usaha ke depan.

Secara keseluruhan, kinerja industri perbankan nasional pada tahun 2025 menunjukkan hasil yang solid, tercermin dari pertumbuhan aset, dana pihak ketiga, dan kredit yang masing-masing meningkat sebesar 9,51%, 13,81%, dan 9,46%. Namun demikian, Kelompok Bank berdasarkan Modal Inti (KBMI) 1 mencatatkan kinerja yang relatif tertekan, dengan penurunan aset sebesar 9,55%, dana pihak

Overview of Financial Market and Banking Industry

The performance of Indonesia's banking industry throughout 2025 remained very solid and resilient, reflected in a continuously strengthening intermediation function, adequate liquidity, and a well-maintained risk profile. As of December 2025, lending recorded a positive growth of 9.46% (year-on-year), reaching Rp8,693.97 trillion. Based on the type of use, loan growth was driven primarily by Investment Loans, which grew significantly by 20.81%, followed by Consumer Loans at 6.58%, and Working Capital Loans at 4.52%.

In terms of funding, Third Party Funds (DPK) showed strong growth of 13.83% year-on-year, totaling Rp10,057.54 trillion. This growth was supported by positive performance across all deposit instruments, with demand deposits growing by 19.13%, time deposits by 14.28%, and savings deposits by 8.19%. This composition reflected increasing economic activity and public confidence in banking system, while also providing sufficient liquidity to support loan expansion.

Banking industry's liquidity remained at a very adequate level, as reflected in Liquid Assets to Non-Core Deposits (AL/NCD) ratio of 126.15% and Liquid Assets to Third Party Funds (AL/DPK) ratio of 28.57%, significantly above the established threshold. Furthermore, the Liquidity Coverage Ratio (LCR), which reached 200.97%, demonstrated banking industry's ability to meet short-term liquidity needs while strengthening financial sector's resilience to potential external pressures.

In terms of profitability, banking industry continued to record stable performance with Return on Assets (ROA) of 2.53%, a slight increase compared to the previous period. Meanwhile, Capital Adequacy Ratio (CAR) remained high at 25.89%, reflecting strong capacity of banking to absorb potential risks and support future business expansion.

Overall, the national banking industry's performance in 2025 showed solid results, reflected in growth in assets, third-party funds, and loans, which increased by 9.51%, 13.81%, and 9.46%, respectively. However, Bank Group based on Core Capital (KBMI) 1 recorded relatively depressed performance, with a decline in assets of 9.55%, third-party funds of 4.55%, and loans of 6.56% throughout 2025. Going

ketiga sebesar 4,55%, dan kredit sebesar 6,56% sepanjang tahun 2025. Ke depan, sektor perbankan diharapkan terus memainkan peran strategis dalam memperkuat fungsi intermediasi, mendorong inklusi keuangan, serta menopang pertumbuhan ekonomi nasional yang berkelanjutan.

Sumber:
- Siaran Pers Otoritas Jasa Keuangan, "Kebijakan OJK Menjaga Sektor Jasa Keuangan Semakin Mendukung Program Prioritas Pemerintah"; dan
- Portal Data Otoritas Jasa Keuangan, "Dataset Industri Bank Umum".

forward, banking sector is expected to continue playing a strategic role in strengthening intermediation function, driving financial inclusion, and supporting sustainable national economic growth.

Sources:
- Press Release of Financial Services Authority, "OJK Policy Maintains Financial Services Sector to Further Support Government's Priority Programs"; and
- Data Portal of Financial Services Authority, " Dataset of Commercial Bank Industry".

Tinjauan Operasional
Operational Overview

Strategi Pengembangan Bisnis

Bank Victoria berkomitmen untuk terus mendorong inovasi dalam pengembangan produk, jasa, dan layanan yang ditawarkan, serta secara berkesinambungan memperluas saluran distribusi dan memperkuat infrastruktur pendukung lainnya. Seluruh upaya ini bertujuan untuk menghadirkan pengalaman perbankan yang relevan, efisien, dan bernilai tambah bagi nasabah, selaras dengan perkembangan teknologi, perubahan perilaku nasabah, serta dinamika industri jasa keuangan yang terus berkembang.

Sebagai perwujudan nyata dari komitmen tersebut, Bank telah menyusun rencana strategis yang mencerminkan arah kebijakan dan prioritas pengembangan bisnis sepanjang tahun 2025. Rencana ini menjadi pedoman utama bagi Bank Victoria dalam mengimplementasikan berbagai program kerja yang berfokus pada peningkatan daya saing, penguatan kapabilitas internal, serta optimalisasi layanan kepada nasabah. Adapun fokus utama strategi pengembangan bisnis yang dijalankan Bank Victoria pada tahun 2025 meliputi:

1. **Strategi Perkreditan**
   Strategi di bidang perkreditan diprioritaskan pada upaya menjaga dan meningkatkan kualitas kredit, termasuk pemberian kredit yang ramah lingkungan untuk mencapai target pertumbuhan yang sehat dan berkelanjutan dengan tetap memperhatikan prinsip kehati–hatian (*prudential financing*). Beberapa strategi bisnis yang akan dilakukan adalah sebagai berikut:
   a. Memproyeksikan pertumbuhan total kredit secara selektif dan konservatif pada kisaran 7%;
   b. Meningkatkan penyaluran kredit melalui model bisnis *channeling* dengan menjalin kerja sama dengan *fintech*, BPR, *multifinance*, dan koperasi guna meningkatkan portofolio kredit, potensi *fee based income*, dan memperluas penetrasi bisnis;

Business Development Strategy

Bank Victoria is committed to continuously driving innovation in the development of products and services offered, as well as continuously expanding distribution channels and strengthening other supporting infrastructure. All of these efforts aim to provide a relevant, efficient, and value-added banking experience for customers, in line with technology developments, changing customer behavior, and the ever-evolving dynamics of financial services industry.

As a concrete manifestation of this commitment, the Bank prepared a strategic plan reflecting its policy direction and business development priorities throughout 2025. This plan served as the primary guideline for Bank Victoria in implementing various work programs focused on increasing competitiveness, strengthening internal capabilities, and optimizing customer service. The main focuses of business development strategy carried out by Bank Victoria in 2025 included:

1. **Loans Strategies**
   The strategy in loan sector is prioritized on efforts to maintain and improve loan quality, including environmentally friendly lending to achieve healthy and sustainable growth targets while adhering to prudential financing principles. Several business strategies to be implemented are as follows:

   a. Projecting total loan growth selectively and conservatively in the range of 7%;
   b. Increasing lending through a channeling business model by collaborating with fintech, BPR, multifinance, and cooperatives in order to increase the loan portfolio, potential fee-based income, and expand business penetration;

c. Mengembangkan ekosistem *digital lending* untuk memberikan kemudahan akses informasi dan mempercepat proes penyaluran kredit kepada debitur;
d. Menjaga dan meningkatkan kualitas kredit melalui monitoring debitur, pelaksanaan *early warning system*, serta pengembangan sumber daya manusia dan sistem;
e. Mempercepat penyelesaian kredit yang dihapusbukukan dan penjualan agunan yang diambilalih, termasuk melalui optimalisasi penjualan jaminan dan agunan yang diambil alih melalui situs web; dan
f. Mengoptimalkan program pelatihan yang berkelanjutan untuk meningkatkan kapasitas dan kompetensi tenaga penjualan.

2. Strategi Pendanaan dan Pengembangan Layanan

Strategi di bidang pendanaan dan pengembangan layanan diprioritaskan pada upaya menjaga dan meningkatkan loyalitas nasabah serta menambah nasabah baru, dengan target pertumbuhan didukung oleh struktur pendanaan yang sehat dan optimal. Beberapa strategi bisnis yang akan dilakukan adalah sebagai berikut:

a. Menargetkan pertumbuhan pendanaan pada kisaran 5% (yoy) dengan tetap memprioritaskan pengendalian *cost of fund*;
b. Mengembangkan berbagai program akuisisi nasabah baru, antara lain melalui penawaran *cashback* atau suku bunga yang menarik;
c. Menjalin kerja sama dan meningkatkan penjualan produk obligasi ritel, *bancassurance*, dan reksa dana guna meningkatkan pendapatan berbasis *fee (fee-based income)*;
d. Melakukan pengembangan secara berkelanjutan melalui *Revamping Internet Banking, Mobile Banking, Internet Banking Business*, dan *Mobile Banking Corporate* yang dilengkapi dengan fitur dan produk digital yang unggul serta kompetitif untuk memenuhi kebutuhan transaksi keuangan nasabah;
e. Melanjutkan peningkatan kualitas layanan guna memenuhi kebutuhan nasabah melalui pengembangan *digital operations*, yaitu melakukan aktivitas transaksi non-tunai dengan memanfaatkan teknologi *video banking* sehingga interaksi dapat dilakukan secara *virtual* dengan tetap mengedepankan prinsip kehati-hatian serta keamanan bertransaksi;
f. Melakukan promosi melalui media sosial dan/atau kegiatan lainnya untuk meningkatkan kesadaran terhadap produk dan layanan Bank Victoria;
g. Melanjutkan peningkatan layanan transaksi perbankan untuk mendukung kebutuhan transaksi para pemangku kepentingan serta memperluas penetrasi peluang bisnis;

c. Developing a digital lending ecosystem to provide easy access to information and accelerate lending process to debtors;
d. Maintaining and improving loan quality through debtor monitoring, implementing early warning system, and developing human capital and systems;
e. Accelerating the settlement of written-off loans and the sale of foreclosed assets, including through the optimization of the sale of collateral and foreclosed assets via website; and
f. Optimizing ongoing training programs to improve the capacity and competence of sales personnel.

2. Funding and Service Development Strategies

The strategy in funding and service development is prioritized on efforts to maintain and enhance customer loyalty and acquire new customers, with growth targets supported by a healthy and optimal funding structure. Several business strategies to be implemented are as follows:

a. Targeting funding growth in the range of 5% (yoy) while prioritizing cost of funds control;
b. Developing various new customer acquisition programs, including cashback offers or attractive interest rates;
c. Establishing partnerships and increasing sales of retail bonds, bancassurance, and mutual funds to increase fee-based income;
d. Carrying out continuous development through Revamping Internet Banking, Mobile Banking, Internet Banking Business, and Mobile Banking Corporate, complemented by excellent and competitive digital features and products to meet customers' financial transaction needs;
e. Continuing to improve service quality to meet customer needs through the development of digital operations, namely conducting cashless transactions using video banking technology so that interactions can be conducted virtually by still prioritizing the principles of prudence and transaction security;
f. Conducting promotions through social media and/or other activities to raise awareness of Bank Victoria's products and services;
g. Continuing to improve banking transaction services to support stakeholders' transaction needs and expand business opportunities;

h. Dalam rangka mendukung penerapan keuangan berkelanjutan, Bank akan terus melakukan pendekatan melalui program *corporate social responsibility* (CSR) di bidang kesehatan, pendidikan, dan kemasyarakatan; serta
i. Meningkatkan sinergi kerja sama dengan grup usaha dalam pengembangan bisnis berkelanjutan, termasuk layanan perbankan syariah.

3. Strategi Operasional dan Teknologi Sistem Informasi

Strategi di bidang operasional dan teknologi sistem informasi diprioritaskan pada pemanfaatan dan pengembangan teknologi informasi secara berkelanjutan dalam rangka mendukung peningkatan kualitas layanan, efektivitas operasional bisnis, keamanan, dan kepatuhan terhadap regulasi. Beberapa strategi yang akan diterapkan oleh Bank adalah sebagai berikut:

a. Meningkatkan *service excellence* kepada nasabah guna memastikan operasional Bank berjalan dengan baik dan optimal;
b. Melanjutkan evaluasi kinerja jaringan kantor cabang, termasuk aspek geografis, untuk mendorong peningkatan penjualan, produktivitas, dan efisiensi guna mendukung profitabilitas Bank secara keseluruhan;
c. Melakukan peninjauan ulang dan pengembangan terhadap kontrol pengamanan sistem teknologi informasi yang efektif dan memastikan tingkat kepatuhan yang tinggi terhadap ketentuan regulator;
d. Melanjutkan penguatan dan pengembangan operasional untuk meningkatkan kualitas interaksi dan layanan kepada nasabah dan mendukung rencana bisnis yang berkelanjutan;
e. Meningkatkan layanan dan produk perbankan melalui pengembangan *digital banking*;
f. Mendorong transformasi digital perbankan secara berkelanjutan;
g. Melanjutkan pengembangan ke arah proyek *analytics* yang mendukung kegiatan operasional dan bisnis, serta pemenuhan ketentuan kepatuhan, dalam rangka meningkatkan hubungan kepada nasabah, memperkuat monitoring layanan, dan mempercepat *management oversight* di seluruh cabang dan lini usaha;
h. Melakukan relokasi *data center* guna menunjang aktivitas operasional Bank dan memastikan keberlangsungan sistem operasional dalam keadaan krisis atau bencana;
i. Melakukan peningkatan dan pembaruan aplikasi dan infrastruktur Bank untuk mendukung kebutuhan bisnis;
j. Meningkatkan manajemen proyek berbasis *system development live cycle* (SDLC) dengan pendekatan *agile/scrum* maupun *waterfall*; serta
k. Meningkatkan koordinasi dan komunikasi dalam pengembangan teknologi informasi, baik secara internal maupun dengan pemangku kepentingan Bank.

h. In supporting the implementation of sustainable finance, the Bank will continue to implement the approach through corporate social responsibility (CSR) programs in health, education, and community development; and
i. Increasing synergy in collaboration with business groups in developing sustainable businesses, including Islamic banking services.

3. Operational and Information Systems Technology Strategies

The strategy in operational and information systems technology is prioritized on the continuous utilization and development of information technology to support improved service quality, business operational effectiveness, security, and regulatory compliance. Several business strategies to be implemented by the Bank are as follows:

a. Improving service excellence to customers to ensure the Bank's operations run smoothly and optimally;
b. Continuing to evaluate the performance of branch network, including geographical aspects, to drive increased sales, productivity, and efficiency to support the Bank's overall profitability;
c. Reviewing and developing effective information technology system security controls and ensuring a high level of compliance with regulatory requirements;
d. Continuing to strengthen and develop operations to enhance the quality of customer interactions and services and support sustainable business plans;
e. Improving banking services and products through the development of digital banking;
f. Encouraging sustainable digital transformation in banking;
g. Continuing to develop analytics projects that support operational and business activities, as well as compliance requirements, in order to improve customer relationships, strengthen service monitoring, and accelerate management oversight across all branches and lines of business;
h. Relocating data centers to support the Bank's operational activities and ensure the continuity of operational systems in the event of crisis or disaster;
i. Improving and updating the Bank's applications and infrastructure to support business needs;
j. Improving project management based on system development life cycle (SDLC) by using agile/scrum and waterfall approaches; and
k. Improving coordination and communication in information technology development, both internally and with the Bank's stakeholders.

Strategi Pemasaran

Dalam menjalankan operasional bisnisnya, Bank Victoria menempatkan aspek pemasaran sebagai salah satu pilar utama yang menentukan keberhasilan dalam menjangkau dan mempertahankan nasabah. Aspek ini berperan strategis dalam memetakan pangsa pasar secara komprehensif untuk mendukung pertumbuhan bisnis yang berkelanjutan, sekaligus melakukan analisis mendalam terhadap kebutuhan dan preferensi pasar yang terus berkembang.

Oleh karena itu, Bank telah merumuskan strategi pemasaran yang dirancang secara adaptif dan proaktif guna memastikan keselarasan antara penawaran produk dan layanan dengan ekspektasi serta permintaan nasabah di berbagai segmen pasar. Berikut ini adalah strategi pemasaran yang telah dijalankan oleh Bank Victoria sepanjang tahun 2025:

1. Mengembangkan inovasi produk dan layanan, baik digital maupun pengembangannya, dengan dukungan sistem teknologi informasi guna menciptakan keunggulan kompetitif dan meningkatkan loyalitas nasabah, serta mendorong pendapatan operasional termasuk *fee-based income* dan memperluas pangsa pasar;
2. Melanjutkan evaluasi kinerja jaringan kantor serta optimalisasi lokasi ke area bisnis yang lebih potensial guna memperluas pangsa pasar, termasuk penguatan promosi dan edukasi produk dan layanan digital sebagai inovasi terkini; serta
3. Mendorong peran aktif jaringan kantor dalam pelaksanaan program literasi keuangan, inklusi keuangan, dan keuangan berkelanjutan.

Marketing Strategy

In carrying out business operations, Bank Victoria places marketing as a key pillar in determining the success in reaching and retaining customers. This aspect plays a strategic role in comprehensively mapping market share to support sustainable business growth, while simultaneously conducting in-depth analysis of evolving market needs and preferences.

Therefore, the Bank has formulated an adaptive and proactive marketing strategy to ensure the alignment between product and service offerings and customer expectations and demands across various market segments. The following were marketing strategies implemented by Bank Victoria throughout 2025:

1. Developing product and service innovations, both in digital and in their development, supported by information technology systems to create competitive advantages and increase customer loyalty, as well as boosting operational income, including fee-based income, and expanding market share;
2. Continuing to evaluate office network performance and optimizing locations in more potential business areas to expand market share, including strengthening promotion and education of digital products and services as the latest innovations; and
3. Encouraging the active role of office network in implementing financial literacy, financial inclusion, and sustainable finance programs.

Pangsa Pasar

Bank Victoria secara konsisten melakukan pemetaan pangsa pasar secara berkala sebagai bagian dari upaya strategis dalam memahami posisi kompetitifnya di industri perbankan. Pemetaan ini dilakukan melalui analisis komparatif terhadap Bank Umum Konvensional (BUK) secara nasional serta Kelompok Bank dengan Modal Inti (KBMI) 1. Pendekatan ini memungkinkan Bank Victoria untuk mengevaluasi kinerja bisnisnya secara menyeluruh, mengidentifikasi tren pasar, serta mengantisipasi perubahan dinamika persaingan yang terjadi. Uraian terkait pangsa pasar Bank Victoria pada periode 2025 sebagai berikut:

Market Share

Bank Victoria consistently carries out periodic market share mapping as a strategic effort to understand its competitive position in banking industry. This mapping is conducted through comparative analysis of Conventional Commercial Banks (BUK) nationwide and Bank Group with Core Capital (KBMI) 1. This approach allows Bank Victoria to comprehensively evaluate business performance, identify market trends, and anticipate changing competitive dynamics. The description of Bank Victoria's market share in 2025 was as follows:

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

Uraian	2025			2024			Description
	Aset Assets	Kredit Loans	DPK Third-Party Funds	Aset Assets	Kredit Loans	DPK Third-Party Funds	
BUK	**13,646,417**	**8,693,972**	**10,057,543**	12,460,955	7,942,947	8,837,242	BUK
KBMI 1	**1,309,081**	**757,559**	**930,499**	1,447,345	810,760	974,815	KBMI 1

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

Uraian	2025			2024			Description
	Aset Assets	Kredit Loans	DPK Third-Party Funds	Aset Assets	Kredit Loans	DPK Third-Party Funds	
Bank Victoria	**36,202**	**22,380**	**24,295**	31,046	20,560	23,332	Bank Victoria
Pangsa Pasar terhadap BUK (%)	**0.27**	**0.26**	**0.24**	0.25	0.26	0.26	Market Share to BUK (%)
Pangsa Pasar terhadap KBMI 1 (%)	**2.77**	**2.95**	**2.61**	2.15	2.54	2.39	Market Share of KBMI 1 (%)

Pangsa Pasar Bank Victoria terhadap Industri Perbankan

Berdasarkan total aset, penguasaan pasar Bank Victoria terhadap Industri perbankan nasional pada tahun 2025 tercatat sebesar 0,27%, meningkat dibandingkan tahun 2024. Dari sisi dana pihak ketiga, pangsa pasar Bank Victoria tercatat sebesar 0,24%, mengalami penurunan dibandingkan tahun 2024 yang sebesar 0,26%. Sementara itu, dari sisi penyaluran kredit, pangsa pasar Bank Victoria terhadap industri perbankan berada di level 0,26%, berada pada level yang sama seperti tahun sebelumnya.

Pangsa Pasar Bank Victoria terhadap KBMI 1

Pada kelompok Bank berdasarkan Modal Inti KBMI 1, pangsa pasar Bank Victoria dari sisi total aset tercatat sebesar 2,77% pada tahun 2025, lebih tinggi dari tahun 2024 yang tercatat sebesar 2,15%. Dari sisi dana pihak ketiga, pangsa pasar Bank Victoria pada tahun 2025 mencapai 2,61%, meningkat dari 2,39% pada tahun sebelumnya. Sementara itu, pangsa pasar kredit yang disalurkan Bank Victoria terhadap KBMI 1 mengalami peningkatan dari 2,54% pada tahun 2024 menjadi 2,95% pada tahun 2025.

Bank Victoria's Market Share in Banking Industry

Based on the total assets, Bank Victoria's market share in national banking industry in 2025 was recorded at 0.27%, increasing compared to that of 2024. In terms of third party funds, Bank Victoria's market share was recorded at 0.24%, decreasing compared to 0.26% in 2024. Meanwhile, from lending side, Bank Victoria's market share in banking industry was at 0.26%, the same as that of the previous year.

Bank Victoria's Market Share of KBMI 1

In the Bank group based on KBMI 1 Core Capital, Bank Victoria's market share in terms of total assets was recorded at 2.77% in 2025, higher than the 2.15% recorded in 2024. In terms of third-party funds, Bank Victoria's market share in 2025 reached 2.61%, an increase from 2.39% in the previous year. Meanwhile, the market share of lending by Bank Victoria to KBMI 1 increased from 2.54% in 2024 to 2.95% in 2025.

Suku Bunga Dasar Bank

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

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

Prime Lending Rate

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

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

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

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

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

(dalam % / in %)

Uraian	2025	2024	Description
Giro			**Demand Deposits**
Rupiah	**0.67**	0.67	Rupiah
Dolar Amerika Serikat	**0.82**	0.82	United States Dollar
Tabungan			**Savings Deposits**
Rupiah	**0.94**	0.9	Rupiah
Dolar Amerika Serikat	**N/A**	N/A	United States Dollar
Deposito Berjangka			**Time Deposits**
Rupiah	**6.06**	6.20	Rupiah
Dolar Amerika Serikat	**4.13**	4.20	United States Dollar

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

(dalam % / in %)

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Harga Pokok Dana untuk Kredit (HPDK) Cost of Funds for Loans (HPDK)						
Biaya Dana	6.98	6.98	6.98	6.98	6.98	Cost of Funds
Biaya Dana Pihak Ketiga	5.61	5.61	5.61	5.61	5.61	Cost of Third-Party Funds
Biaya Dana Bukan Pihak Ketiga	1.37	1.37	1.37	1.37	1.37	Cost of Non-Third-Party Funds
Biaya Dana Liabilitas kepada Bank Lain	0.24	0.24	0.24	0.24	0.24	Cost of Liability Funds to Other Banks
Biaya Dana Liabilitas kepada Bank Indonesia	0.00	0.00	0.00	0.00	0.00	Cost of Liability Funds to Bank Indonesia
Biaya Dana Surat Berharga	1.13	1.13	1.13	1.13	1.13	Cost of Securities Funds
Biaya Dana Pinjaman yang Diterima	0.00	0.00	0.00	0.00	0.00	Cost of Borrowing Funds
Biaya Dana Liabilitas antar Kantor	0.00	0.00	0.00	0.00	0.00	Cost of Inter-Office Liability Funds
Biaya Dana Liabilitas Keuangan Permodalan	0.00	0.00	0.00	0.00	0.00	Cost of Capital Finance Liability Funds
Biaya Dana Lainnya	0.00	0.00	0.00	0.00	0.00	Cost of Other Funds
Biaya Promosi dan Pemasaran terkait Pendanaan	0.00	0.00	0.00	0.00	0.00	Cost of Promotion and Marketing related to Funding

(dalam % / in %)

Komponen[1]	Kredit Korporasi[2] Corporate Loans[2]	Kredit Ritel[2] Retail Credit[2]	Kredit Mikro[3] Micro Credit[3]	Kredit Konsumsi[2] Consumer Credit[2]		Component[1]
				KPR House Loan	Non-KPR[4] Non-House Loan[4]	
Lainnya	0.00	0.00	0.00	0.00	0.00	Others
Biaya Jasa	0.00	0.00	0.00	0.00	0.00	Cost of Services
Biaya Regulasi	0.00	0.00	0.00	0.00	0.00	Cost of Regulations
Biaya GWM	0.00	0.00	0.00	0.00	0.00	Cost of Statutory Reserve Requirement
Biaya Premi Penjaminan Lembaga Penjamin Simpanan	0.00	0.00	0.00	0.00	0.00	Cost of Deposit Insurance Corporation Guarantee Premium
HPDK Lainnya	0.00	0.00	0.00	0.00	0.00	Other HPDK
Biaya Kas	0.00	0.00	0.00	0.00	0.00	Cost of Cash
Lainnya	0.00	0.00	0.00	0.00	0.00	Others
Biaya *Overhead* Overhead Cost						
Biaya Tenaga Kerja	0.67	0.67	0.67	0.67	0.67	Labor Cost
Biaya Pendidikan dan Pelatihan	0.00	0.00	0.00	0.00	0.00	Education and Training Cost
Biaya Penelitian dan Pengembangan	0.00	0.00	0.00	0.00	0.00	Research and Development Cost
Biaya Sewa	0.00	0.00	0.00	0.00	0.00	Rent Cost
Biaya Promosi dan Pemasaran	0.06	0.06	0.06	0.06	0.06	Promotion and Marketing Cost
Cash Back	0.00	0.00	0.00	0.00	0.00	Cash Back
Hadiah	0.00	0.00	0.00	0.00	0.00	Gifts
Iklan dan Promosi	0.06	0.06	0.06	0.06	0.06	Advertising and Promotion
Sponsorship/Entertainment	0.00	0.00	0.00	0.00	0.00	Sponsorship/Entertainment
Lainnya	0.00	0.00	0.00	0.00	0.00	Others
Biaya Pemeliharaan dan Perbaikan	0.00	0.00	0.00	0.00	0.00	Repairs and Maintenance Cost
Biaya Penyusutan Aset Tetap dan Inventaris	0.12	0.12	0.12	0.12	0.12	Depreciation of Fixed Asset and Inventory Cost
Biaya *Overhead* Lainnya	0.87	0.87	0.87	0.87	0.87	Other Overhead Cost
Biaya Barang/Jasa dan Administrasi	0.01	0.01	0.01	0.01	0.01	Goods/Services and Administration Cost
Lainnya	0.86	0.86	0.86	0.86	0.86	Others
Margin Keuntungan	**1.00**	**1.50**	**2.50**	**1.00**	**2.50**	**Profit Margin**
SBDK	**9.70**	**10.20**	**11.20**	**9.70**	**11.20**	**SBDK**
Estimasi Premi Risiko	**0.86**	**0.86**	**0.86**	**0.86**	**0.86**	**Risk Premium Estimation**
Suku Bunga Kredit (SBDK + Estimasi Premi Risiko)	**10.56**	**11.06**	**12.06**	**10.56**	**12.06**	**Loan Interest Rate (SBDK + Risk Premium Estimation)**

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

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

(dalam % / in %)

Uraian	2025	2024	Description
Rupiah	**9.95**	10.27	Rupiah
Dolar Amerika Serikat	**4.87**	5.39	United States Dollar

Tinjauan Segmen Usaha

Penjelasan dan Kinerja Operasional Segmen Operasi

Dalam menjalankan kegiatan usahanya, Bank Victoria berfokus pada 1 (satu) segmen usaha utama, yaitu segmen perbankan konvensional. Segmen ini mencakup rangkaian produk dan layanan yang komprehensif, termasuk penghimpunan dana pihak ketiga, produk pinjaman kredit, serta berbagai jasa perbankan lainnya yang dirancang untuk memenuhi kebutuhan finansial nasabah secara menyeluruh. Adapun penjelasan mengenai kinerja segmen konvensional Bank Victoria sepanjang tahun 2025 diuraikan sebagai berikut:

1. **Penghimpunan Dana (Simpanan)**

   Bank menjalankan kegiatan penghimpunan dana dari masyarakat melalui 3 (tiga) produk utama, yaitu tabungan, giro, dan deposito berjangka. Setiap produk dirancang dengan karakteristik dan keunggulan yang berbeda guna memenuhi beragam kebutuhan serta preferensi nasabah dari berbagai segmen pasar.

   Produk tabungan menawarkan kemudahan dan fleksibilitas dalam bertransaksi, giro memberikan solusi optimal untuk kebutuhan likuiditas dan transaksi bisnis, sementara deposito berjangka memberikan pilihan investasi dengan tingkat pengembalian yang kompetitif dan jangka waktu yang variatif. Kinerja produk simpanan Bank dalam 2 (dua) tahun terakhir diuraikan sebagai berikut:

Business Segment Overview

Explanation and Operational Performance of Operating Segment

In carrying out its business activities, Bank Victoria focuses on 1 (one) main business segment, namely conventional banking. This segment encompasses a comprehensive range of products and services, including collection of third-party funds, loan product, and other banking services designed to meet the comprehensive financial needs of customers. The explanation regarding the conventional segment performance of Bank Victoria throughout 2025 was outlined as follows:

1. **Funding (Savings)**

   The Bank carries out funding activities from the community through 3 (three) main products, namely savings deposits, demand deposits, and time deposits. Each product is designed with distinct characteristics and advantages to meet the diverse needs and preferences of customers from various market segments.

   Savings deposits product offer convenience and flexibility in transactions, demand deposits provide optimal solutions for liquidity needs and business transactions, while time deposits offer investment options with competitive returns and varying terms. The performance of the Bank's savings products over the past 2 (two) years is outlined as follows:

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

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	**45,237**	**64.64**	52,529	66.84	(13.88)	Savings Deposits
Giro	**2,755**	**3.94**	3,114	3.96	(11.53)	Demand Deposits
Deposito Berjangka	**21,935**	**31.34**	22,759	28.96	(3.62)	Time Deposits
Negotiable Certificate Deposits	**61**	**0.09**	181	0.23	(66.30)	Negotiable Certificate Deposits
Total	**69,988**	**100.00**	**78,583**	**100.00**	**(10.94)**	**Total**

Per akhir tahun 2025, Bank mencatat penurunan penghimpunan dana pihak ketiga dengan total rekening mencapai 69.988 unit rekening, menurun sebesar 10,94% dibandingkan dengan periode sebelumnya yang tercatat sebanyak 78.583 unit rekening. Penurunan ini terutama dipengaruhi oleh produk tabungan yang menurun sebesar 13,88%. Pada tahun 2025, produk tabungan mendominasi 64,64% dari total rekening dana pihak ketiga.

As of the end of 2025, the Bank recorded a decline in the collection of third-party funds, reaching a total of 69,988. account units, decreased by 10.94% compared to that of the previous period of 78,583. account units. This decline was primarily driven by savings deposits product, which decreased by 13.88%. In 2025, savings deposits product dominated 64.64% of the total third-party fund accounts.

Total Dana Pihak Ketiga
Total Third-Party Funds

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Tabungan	**3,775,826**	**15.54**	3,286,886	14.09	14.88	Savings Deposits
Giro	**3,350,471**	**13.79**	2,914,891	12.49	14.94	Demand Deposits
Deposito Berjangka	**17,129,088**	**70.51**	16,701,533	71.58	2.56	Time Deposits
Negotiable Certificate Deposits	**39,313**	**0.16**	428,802	1.84	(90.83)	Negotiable Certificate Deposits
Total	**24,294,698**	**100.00**	**23,332,112**	**100.00**	**4.13**	**Total**

Pada periode 31 Desember 2025, Bank berhasil menghimpun total dana pihak ketiga sebesar Rp24,29 triliun, mengalami kenaikan sebesar 4,13% dibandingkan tahun sebelumnya yang tercatat sebesar Rp23,33 triliun. Peningkatan ini dikontribusikan oleh pertumbuhan dana pada produk tabungan dan giro masing-masing sebesar 14,88% dan 14,94%. Meskipun demikian, deposito berjangka tetap menjadi kontributor utama dalam struktur dana pihak ketiga Bank Victoria, dengan komposisi sebesar 70,51% dari total dana pihak ketiga pada tahun 2025.

As of 31 December 2025, the Bank managed to collect total third-party funds of Rp24.29 trillion, an increase of 4.13% compared to Rp23.33 trillion in the previous year. This increase was contributed by the growth of funds in 14.88% product of 14.94%. Product became the main contributor to Bank Victoria's third-party fund structure, with a composition of 70.51% of the total third-party funds in 2025.

2. Penyaluran Dana (Pinjaman)

Bank menyalurkan berbagai jenis pinjaman kepada nasabah, baik individu maupun korporasi, sebagai bagian dari pelaksanaan fungsi intermediasi perbankan yang vital dalam mendukung pertumbuhan ekonomi. Produk-produk pinjaman yang ditawarkan dirancang dengan beragam keunggulan kompetitif, tidak hanya melalui tingkat suku bunga yang kompetitif, tetapi juga melalui fleksibilitas, kemudahan proses, dan layanan pendukung yang responsif untuk memenuhi kebutuhan beragam segmen debitur. Adapun kinerja produk pinjaman Bank selama 2 (dua) tahun terakhir diuraikan sebagai berikut:

2. Lending (Loans)

The Bank provides various types of loans to customers, both individuals and corporations, as part of its vital banking intermediation function in supporting economic growth. The loan products offered are designed with a variety of competitive advantages, not only through competitive interest rates, but also through flexibility, easy process, and responsive support services to meet the needs of various debtor segments. The Bank's loan product performance over the past 2 (two) years is described as follows:

Produk Pinjaman berdasarkan Pihak
Loan Products by Party

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pihak Ketiga	**22,160,535**	**99.02**	20,436,393	99.40	8.44	Third Parties
Pihak Berelasi	**219,631**	**0.98**	123,467	0.60	77.89	Related Parties
Total	**22,380,166**	**100.00**	**20,559,860**	**100.00**	**8.85**	**Total**

Pada tahun 2025, penyaluran dana dalam bentuk kredit kepada pihak ketiga tercatat sebesar Rp22,16 triliun, mengalami kenaikan sebesar 8,44% dibandingkan tahun 2024 yang sebesar Rp20,44 triliun. Sedangkan, penyaluran dana kepada pihak berelasi mengalami kenaikan sebesar 77,89%, dari Rp123,47 miliar pada tahun sebelumnya menjadi Rp219,63 miliar di tahun 2025. Secara komposisi, portofolio kredit Bank masih didominasi oleh pinjaman kepada pihak ketiga dengan porsi sebesar 99,02% dari total penyaluran pinjaman.

In 2025, lending in the form of loans to third parties was recorded at Rp22.16 trillion, an increase of 8.44% compared to Rp20.44 trillion in 2024. Meanwhile, lending to related parties increased by 77.89%, from Rp123.47 billion. in the previous year to Rp219.63 billion in 2025. In terms of composition, the Bank's loan portfolio was still dominated by loans to parties with a portion of 99.02.% of the total lending.

Produk Pinjaman berdasarkan Jenis Pinjaman
Loan Products by Types of Loans

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pinjaman Tetap	**10,884,934**	**48.64**	10,085,769	49.06	7.92	Fixed Loans
Pinjaman Tetap dengan Angsuran	**9,297,680**	**41.54**	8,110,450	39.45	14.64	Fixed Loans with Installments
Pinjaman Rekening Koran	**1,946,813**	**8.70**	2,122,250	10.32	(8.27)	Overdraft Loans
Pinjaman Konsumen	**178,400**	**0.80**	167,347	0.81	6.60	Consumer Loans
Pinjaman Serba Guna	**72,339**	**0.32**	74,045	0.36	(2.30)	Multi Purpose Loans
Total	**22,380,166**	**100.00**	**20,559,860**	**100.00**	**8.85**	**Total**

Per 31 Desember 2025, Bank berhasil menyalurkan total pinjaman sebesar Rp22,38 triliun, mengalami peningkatan sebesar 8,85% dari tahun sebelumnya yang tercatat sebesar Rp20,56 triliun. Pertumbuhan tersebut terutama didorong oleh pinjaman tetap dengan angsuran yang meningkat sebesar 14,64%. Dari sisi komposisi portofolio, pinjaman tetap menjadi kontributor utama dengan proporsi sebesar 48,64% dari total penyaluran pinjaman Bank Victoria pada tahun 2025.

As of 31 December 2025, the Bank managed to distribute total loans of Rp22.38 trillion, an increase of 8.85% from that of the previous year of Rp20.56 This growth was primarily driven by fixed loans which increased by 14.64%. In terms of portfolio composition, fixed loans were the main contributor, with a proportion of 48.64% of Bank Victoria's total lending in 2025.

Produk Pinjaman berdasarkan Sektor Ekonomi
Loan Products by Economic Sector

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Lembaga Pembiayaan	**5,111,935**	**22.84**	5,577,685	27.13	(8.35)	Financing
Perdagangan, Restoran, dan Hotel	**4,572,237**	**20.43**	4,092,649	19.91	11.72	Trading, Restaurant, and Hotel
Industri	**3,817,154**	**17.06**	3,015,057	14.66	26.60	Industry
Real Estat	**3,061,966**	**13.68**	2,476,933	12.05	23.63	Real Estate
Konstruksi	**1,110,646**	**4.96**	1,100,320	5.35	0.94	Construction
Jasa-Jasa Sosial/Masyarakat	**515,917**	**2.31**	417,107	2.03	23.69	Social/Community Services
Lain-Lain	**4,190,311**	**18.72**	3,880,110	18.87	7.99	Others
Total	**22,380,166**	**100.00**	**20,559,860**	**100.00**	**8.85**	**Total**

Berdasarkan sektor ekonomi, kontribusi penyaluran pinjaman terbesar pada tahun 2025 berasal dari sektor lembaga pembiayaan sebesar Rp5,11 triliun atau 22,84% dari total pinjaman. Sedangkan, kontribusi penyaluran pinjaman terkecil pada tahun 2025 berasal dari sektor jasa-jasa sosial/masyarakat sebesar Rp515,92 miliar atau 2,31% dari total pinjaman.

Based on economic sector, the largest contribution of lending in 2025 was from financing sector of Rp5.11 trillion or 22.84% of the total loans. Meanwhile, the smallest contribution of lending in 2025 was from social community service sector of Rp515.92 billion or 2.31% of the total loans.

Produk Pinjaman UMKM
MSME Loan Products

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Usaha Mikro	**-**	**-**	-	-	-	Micro Business
Usaha Kecil	**12,048**	**0.36**	13,778	0.43	(12.56)	Small Business
Usaha Menengah	**3,358,230**	**99.64**	3,157,840	99.57	6.35	Medium Business
Total	**3,370,278**	**100.00**	**3,171,618**	**100.00**	**6.26**	**Total**

Per 31 Desember 2025, Bank membukukan total pinjaman UMKM sebesar Rp3,37 triliun, mengalami peningkatan sebesar 6,26% dibandingkan 31 Desember 2024 sebesar Rp3,17 triliun. Peningkatan ini terutama berasal segmen usaha menengah yang mengalami kenaikan sebesar 6,35% dibandingkan tahun sebelumnya.

As of 31 December 2025, the Bank recorded total MSME loans of Rp3.37 trillion, increasing by 6.26% compared to Rp3.17 trillion as of 31 December 2024. This increase primarily came from medium-sized business segment, which increased by 6.35% compared to the previous year.

3. Jasa Layanan

Bank Victoria memberikan berbagai layanan penunjang yang bertujuan untuk memudahkan nasabah dalam melakukan transaksi perbankan. Kinerja layanan perbankan Bank Victoria dalam 2 (dua) tahun terakhir diuraikan sebagai berikut:

3. Services

Bank Victoria provides various supporting services aimed at facilitating customers in conducting banking transactions. The performance of Bank Victoria's banking services in the past 2 (two) years is outlined as follows:

Layanan Keuangan
Financial Services

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Kliring	**220,173**	**25.09**	156,031	18.90	41.11	Clearing
Postpaid	**87,826**	**10.01**	6,823	0.83	1187.21	Postpaid
Prepaid	**103**	**0.01**	133	0.02	(22.56)	Prepaid
Pembayaran Telkom	**643**	**0.07**	8,238	1.00	(92.19)	Telkom Payment
Pembayaran Gaji Karyawan	**110,009**	**12.54**	100,784	12.21	9.15	Employees' Salary Payments
ATM Victoria	**458,808**	**52.28**	553,746	67.06	(17.14)	ATM Victoria
Total	**877,562**	**100.00**	**825,755**	**100.00**	**6.27**	**Total**

Kinerja layanan Bank Victoria per 31 Desember 2025 tercatat mengalami peningkatan sebesar 6,27% atau setara Rp51,81 miliar menjadi Rp877,56 miliar dari sebelumnya tercatat Rp825,76 miliar di tahun 2024. Layanan yang berkontribusi paling tinggi, yaitu ATM Victoria sebesar 52,28%.

Bank Victoria's service performance as of 31 December 2025 recorded an increase of 6.27% or equivalent to Rp51.81 billion to Rp877.56 billion from previously Rp825.76 billion in 2024. The service with the highest contribution was ATM Victoria, with 52.28%.

Layanan Bank Devisa
Foreign Exchange Bank Services

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

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	**2,716**	**11.04**	808	65.00	236.14	Demand Deposits
Deposito Berjangka	**21,881**	**88.96**	435	35.00	4,930.11	Time Deposits
Total	**24,597**	**100.00**	**1,243**	**100.00**	**1,878.84**	**Total**

Total rekening dana pihak ketiga dari layanan bank devisa pada tahun 2025 mengalami peningkatan signifikan sebesar 1.878,84% dari 1.243 unit rekening di tahun 2024 menjadi 24.597 unit rekening di tahun 2025. Peningkatan ini bersumber dari rekening deposito berjangka yang meningkat signifikan sebesar 4.930,11%.

Total third-party fund accounts from foreign exchange banking services in 2025 increased significantly by 1,878.84% from 1,243 account units in 2024 to 24,597 account units in 2025. This increase was driven by the significant increase in time deposit account units of 4,930.11%.

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

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Giro	**276,714**	**19.36**	69,851	8.10	296.15	Demand Deposits
Deposito Berjangka	**1,152,839**	**80.64**	792,560	91.90	45.46	Time Deposits
Total	**1,429,553**	**100.00**	**862,411**	**100.00**	**65.76**	**Total**

Sejalan dengan peningkatan total rekening dana pihak ketiga dari layanan bank devisa di tahun 2025, total dana yang berhasil dihimpun juga mengalami peningkatan sebesar 65,76%, dari sebelumnya sebesar Rp862,41 miliar di tahun 2024 menjadi Rp1,43 triliun di tahun 2025. Kondisi tersebut terutama didorong oleh peningkatan dana deposito berjangka sebesar 45,46%.

In line with the increase in total third-party fund accounts from foreign exchange banking services in 2025, the total funding also increased by 65.76%, from previously Rp862.41 billion in 2024 to Rp1.43 trillion in 2025. Such condition was primarily driven by the increase in time deposits of 45.46%.

Transaksi melalui Jaringan Layanan Utama
Transactions through the Main Service Network

Jumlah Transaksi
Total Transactions

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Mobile Banking	**1,747,996**	**76.88**	1,782,570	73.85	(1.94)	Mobile Banking
Internet Banking	**8,474**	**0.37**	11,965	0.50	(29.18)	Internet Banking
Teller	**120,449**	**5.30**	139,368	5.77	(13.57)	Teller
ATM	**396,735**	**17.45**	479,794	19.88	(17.31)	ATM
Total	**2,273,654**	**100.00**	**2,413,697**	**100.00**	**(5.80)**	**Total**

Sepanjang tahun 2025, total jumlah transaksi Bank Victoria tercatat sebanyak 2.273.654 transaksi yang didominasi oleh transaksi *Mobile Banking*, sedangkan transaksi *Internet Banking* mencatatkan kontribusi yang lebih kecil.

Throughout 2025, the total number of transactions at Bank Victoria was 2,273,654 transactions, dominated by mobile banking transaction, while internet banking transaction recorded a smaller contribution.

Nilai Transaksi
Transaction Value

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

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Mobile Banking	**15,838,108**	**20.56**	20,740,368	23.85	(23.64)	Mobile Banking
Internet Banking	**291,150**	**0.38**	659,971	0.76	(55.88)	Internet Banking

Uraian	2025	Komposisi Composition (%)	2024	Komposisi Composition (%)	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Teller	**60,614,842**	**78.69**	65,226,852	75.01	(7.07)	Teller
ATM	**283,444**	**0.37**	331,082	0.38	(14.39)	ATM
Total	**77,027,544**	**100.00**	**86,958,273**	**100.00**	**(11.42)**	**Total**

Per akhir tahun 2025, total nilai transaksi Bank Victoria tercatat sebesar Rp77,03 triliun, angka tersebut menunjukkan penurunan sebesar 11,42% dibandingkan tahun 2024 yang mencapai Rp86,96 triliun. *Teller* menjadi kontributor terbesar terhadap total nilai transaksi, diikuti oleh *Mobile Banking*, sedangkan ATM mencatatkan kontribusi yang lebih kecil.

As of the end of 2025, the total transaction value of Bank Victoria was Rp77.03 trillion, indicating a decrease of 11.42% compared to that of 2024 of Rp86.96 trillion. Teller was the largest contributor to the total transaction value, followed by mobile banking, while ATM recorded a smaller contribution.

Pendapatan dan Profitabilitas

Pada tahun 2025, Bank Victoria tetap berfokus pada 1 (satu) segmen usaha, yaitu segmen konvensional. Selain itu, Bank juga mengelompokkan laporan berdasarkan segmen geografis, yang dibedakan menurut wilayah operasional untuk mencerminkan perbedaan risiko dan imbal hasil antar daerah. Segmen gerografis yang dilaporkan mencakup wilayah Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur, serta Luar Jawa.

Kinerja pendapatan dan profitabilitas dari masing-masing segmen usaha dan segmen geografis untuk tahun 2025 dan 2024 diuraikan dalam tabel berikut:

Income and Profitability

In 2025, Bank Victoria continued its focus on 1 (one) business segment, namely the conventional segment. In addition, the Bank also groups reports based on geographical segments, differentiated by operational area to reflect differences in risk and return between regions. The reported geographical segment includes Jadetabek region, West Java, Central Java and East Java, and Non Java.

The income and profitability performances of each business segment and geographic segment for 2025 and 2024 are outlined in the following table:

Segmen Usaha
Business Segment

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

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease) (%)	Description
Pendapatan Bunga - Bersih	**558,717**	548,601	1.84	Interest Income - Net
Pendapatan Operasional Lainnya	**533,277**	365,736	45.81	Other Operating Income
Beban Operasional Lainnya	**(870,026)**	(621,366)	40.02	Other Operating Expenses
Laba Operasional	**221,969**	292,970	(24.23)	Profit from Operations
Total Aset	**36,201,697**	31,045,989	16.61	Total Assets
Total Liabilitas	**31,832,776**	27,112,530	17.41	Total Liabilities

Sepanjang tahun 2025, segmen konvensional Bank mencatatkan kenaikan pendapatan bunga – bersih sebesar 1,84%, dari sebelumnya sebesar Rp548,60 miliar menjadi sebesar Rp558,72 miliar. Pendapatan operasional lainnya

Throughout 2025, the Bank's conventional segment recorded an increase/a decrease in net interest income of 1.84%, from previously Rp548.60 billion to Rp558.72 billion. Other operating income from conventional

segmen konvensional turut mengalami kenaikan pada tahun 2025 sebesar 45,81% dari sebelumnya mencapai Rp365,74 miliar menjadi Rp533,28 miliar.

Sementara itu, dari segi profitabilitas terjadi penurunan pada segmen konvensional sebesar 24,23% dari sebelumnya memperoleh laba sebesar Rp292,97 miliar menjadi Rp221,97 miliar di tahun 2025.

segment also increased by 45.81% in 2025, from Rp365.74 billion to Rp533.28 billion.

Meanwhile, in terms of profitability, conventional segment decreased by 24.33%, from a previous profit of Rp292.97 billion to Rp221.97 billion in 2025.

Segmen Geografis
Geographical Segment

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

Uraian	Jadetabek	Jawa Barat West Java	Jawa Tengah dan Jawa Timur Central Java and East Java	Luar Jawa Non Java	Total	Description
2025						
Pendapatan Bunga - Bersih	**530,514**	**11,125**	**57,540**	**(40,461)**	**558,718**	**Interest Income - Net**
Pendapatan Operasional Lainnya	**521,766**	**2,236**	**4,631**	**4,645**	**533,278**	**Other Operating Income**
Laba/(Rugi) Operasional	**322,831**	**(46,973)**	**21,716**	**(75,605)**	**221,969**	**Profit/(Loss) from Operations**
Total Aset	**33,969,231**	**364,483**	**1,434,364**	**433,619**	**36,201,697**	**Total Assets**
Total Liabilitas	**28,849,025**	**656,254**	**1,067,726**	**1,259,770**	**31,832,775**	**Total Liabilities**
2024						
Pendapatan Bunga - Bersih	549,423	11,106	20,835	(32,763)	548,601	Interest Income - Net
Pendapatan Operasional Lainnya	345,167	1,480	8,441	10,648	365,736	Other Operating Income
Laba/(Rugi) Operasional	341,862	2,425	3,679	(54,996)	292,970	Profit/(Loss) from Operations
Total Aset	29,256,280	292,161	1,159,177	338,371	31,045,989	Total Assets
Total Liabilitas	24,853,242	318,504	1,017,511	923,273	27,112,530	Total Liabilities
Kenaikan (Penurunan) (%) Increase (Decrease) (%)						
Pendapatan Bunga - Bersih	(3.44)	0.17	176.17	23.50	1.84	Interest Income - Net
Pendapatan Operasional Lainnya	51.16	51.08	(45.14)	(56.38)	45.81	Other Operating Income
Laba/(Rugi) Operasional	(5.57)	(2,037.03)	490.27	37.47	(24.23)	Profit/(Loss) from Operations
Total Aset	16.11	24.75	23.74	28.15	16.61	Total Assets
Total Liabilitas	16.08	106.04	4.94	36.45	17.41	Total Liabilities

Per 31 Desember 2025, wilayah Jawa Tengah dan Jawa Timur mencatatkan pertumbuhan pendapatan bunga – bersih tertinggi sebesar 176,17%, disusul oleh wilayah Luar Jawa dengan pertumbuhan sebesar 23,50%. Sementara itu, wilayah Jadetabek mencatatkan penurunan pendapatan bunga – bersih sebesar 3,44%.

As of 31 December 2025, the Central Java and East Java regions recorded the highest growth of net interest income of 176.17%, followed by the Non-Java region with a growth of 23.50%. Meanwhile, Jadetabek region recorded a decrease in net interest income of 3.44%.

Dari sisi profitabilitas, wilayah Jawa Tengah dan Jawa Timur mencatatkan peningkatan laba operasional tertinggi sebesar 490,27%, dari sebelumnya sebesar Rp3,68 miliar menjadi Rp21,72 miliar di tahun 2025.

Prospek Usaha 2026

Tahun 2026 menjadi periode yang krusial bagi perekonomian global maupun Indonesia, ditandai oleh kombinasi antara proses pemulihan ekonomi, meningkatnya ketidakpastian geopolitik, serta percepatan transformasi struktural, termasuk adopsi teknologi berbasis *Artificial Intelligence* (AI). Pada tingkat global, pertumbuhan ekonomi global diproyeksikan melambat ke kisaran 3,2% pada tahun 2026, disertai dengan divergensi kinerja antarnegara. Perlambatan ini terutama dipengaruhi oleh dampak kebijakan tarif resiprokal Amerika Serikat serta berlanjutnya tensi geopolitik global.

Di tengah dinamika global tersebut, prospek perekonomian Indonesia pada tahun 2026 tetap menunjukkan ketahanan yang baik. Bank Indonesia memperkirakan pertumbuhan ekonomi berada pada kisaran 4,9%–5,7%, didukung oleh kuatnya konsumsi domestik, peningkatan investasi, khususnya dari sektor pemerintah, serta kinerja ekspor berbasis sumber daya alam. Stabilitas makroekonomi juga diperkirakan tetap terjaga, tercermin dari inflasi yang berada dalam kisaran target 2,5±1%. Hal ini menunjukkan efektivitas bauran kebijakan moneter yang ditempuh, serta sinergi yang erat antara pemerintah pusat dan daerah dalam menjaga stabilitas harga.

Sementara itu, kinerja intermediasi perbankan pada awal tahun mencerminkan tren pertumbuhan yang berkelanjutan, dengan kredit perbankan pada Januari 2026 tumbuh sebesar 9,96% (*year-on-year*), meningkat dibandingkan capaian Desember 2025 sebesar 9,46% (*year-on-year*). Kondisi ini mengindikasikan bahwa fungsi intermediasi perbankan tetap berjalan optimal di tengah dinamika ekonomi global yang masih berfluktuasi. Ke depan, prospek pertumbuhan kredit diperkirakan tetap solid, didukung oleh faktor permintaan dan penawaran yang sama-sama kondusif.

Di sisi lain, minat perbankan dalam menyalurkan kredit terus menunjukkan perbaikan, yang tercermin dari pelonggaran persyaratan pemberian kredit (*lending requirement*). Meski demikian, penerapan prinsip kehati-hatian tetap menjadi fokus utama, khususnya pada segmen kredit konsumsi dan UMKM, seiring dengan masih relatif tingginya risiko kredit pada kedua segmen tersebut. Sejalan dengan perkembangan tersebut, Bank Indonesia memproyeksikan pertumbuhan kredit pada tahun 2026 berada pada kisaran 8%–12%. Untuk mendukung pencapaian tersebut, Bank Indonesia akan terus memperkuat koordinasi kebijakan dengan Pemerintah dan Komite Stabilitas Sistem Keuangan (KSSK), khususnya

In terms of profitability, the Central Java and East Java regions recorded the highest increase in profit from operations by 490.27%, from previously Rp3.68 billion to Rp21.72 billion in 2025.

2026 Business Outlook

Year 2026 serves as a crucial period for both global and Indonesian economies, marked by the combination of economic recovery, increasing geopolitical uncertainty, and accelerated structural transformation, including the adoption of Artificial Intelligence (AI)-based technologies. Globally, global economic growth is projected to slow in the range of 3.2% in 2026, accompanied by performance divergences between countries. This slowdown is primarily influenced by the impact of the United States' reciprocal tariff policy and continued global geopolitical tensions.

Amid these global dynamics, Indonesia's economic prospects in 2026 continue to demonstrate good resilience. Bank Indonesia estimates economic growth in the range of 4.9%–5.7%, supported by strong domestic consumption, increased investment, particularly from government sector, and performance of natural resource-based exports. Macroeconomic stability is also expected to be maintained, represented in the inflation within the target range of 2.5±1%. This matter demonstrates the effectiveness of monetary policy mix implemented, as well as the close synergy between central and regional governments in maintaining price stability.

Meanwhile, banking intermediation performance at the beginning of the year reflects a sustainable growth trend, with banking loan growing by 9.96% year-on-year in January 2026, an increase compared to 9.46% year-on-year in December 2025. This condition indicates that banking intermediation function continues to operate optimally amidst fluctuating global economic dynamics. Going forward, the prospect for loan growth is expected to remain solid, supported by equally conducive demand and supply factors.

On the other hand, banking interest in lending continues to show improvement, as reflected in the easing of lending requirements. Nevertheless, the implementation of prudential principles remains a primary focus, particularly in consumer and MSME loans segment, given the relatively high credit risk in both segments. In line with such developments, Bank Indonesia projects the loan growth in 2026 to be in the range of 8%–12%. To support such achievement, Bank Indonesia will continue to strengthen policy coordination with the Government and the Financial System Stability Committee (KSSK), particularly in promoting the efficiency of interest rate

dalam mendorong efisiensi struktur suku bunga serta meningkatkan efektivitas intermediasi perbankan.

Sumber :
- Artikel Kementerian Keuangan Republik Indonesia, "Dinamika Ekonomi Global dan Indonesia Tahun 2026 : Tantangan Ketidakpastian dan Peluang Pertumbuhan"; dan
- Siaran Pers Bank Indonesia, "*BI-Rate* Tetap 4,75%: Mendorong Pertumbuhan Ekonomi, Mempertahankan Stabilitas".

structure and increasing the effectiveness of banking intermediation.

Sources:
- Article by the Ministry of Finance of the Republic of Indonesia, "Global Economic Dynamics and Indonesia in 2026: Challenges of Uncertainty and Opportunities for Growth"; and
- Press Release of Bank Indonesia, "BI Rate Remains at 4.75%: Driving Economic Growth, Maintaining Stability".

Strategi dan Rencana Kerja 2026

Sebagai bagian dari perencanaan strategis yang berkelanjutan, Bank Victoria telah menetapkan target jangka pendek untuk 1 (satu) tahun ke depan dan target jangka menengah untuk 3 (tiga) tahun ke depan. Penyusunan target ini dilakukan dengan mengacu pada visi dan misi Bank, arah kebijakan strategis, evaluasi terhadap kondisi internal, serta dinamika eksternal yang diproyeksikan akan memengaruhi industri perbankan. Strategi yang dirancang bertujuan untuk memastikan pertumbuhan usaha yang sehat dan berkesinambungan, menjaga profitabilitas, serta meningkatkan daya saing Bank di tengah persaingan industri yang semakin kompetitif.

Adapun target jangka pendek Bank Victoria untuk tahun 2026 meliputi, antara lain:

1. Menjaga rasio kecukupan modal (CAR) di level yang kuat sekitar 23,85% di akhir tahun 2026 guna mengantisipasi potensi risiko dan pertumbuhan serta regulasi permodalan yang lebih ketat;
2. Meningkatkan pertumbuhan dana pihak ketiga (DPK) pada kisaran 5%, kredit pada kisaran 7% dan total aset sekitar 6% menyesuaikan kondisi ekonomi yang masih penuh ketidakpastian dengan potensi perlambatan;
3. Melakuan Penawaran Umum Berkelanjutan (PUB) untuk Obligasi Berkelanjutan V dan Obligasi Subordinasi Berkelanjutan IV dengan nilai maksimum sebesar Rp3,00 triliun pada tahun 2026-2028;
4. Mempertahankan dan meningkatkan pertumbuhan marjin dengan kecenderungan naik yakni *net interest margin* di atas 2,0% dengan mengendalikan *cost of fund*;
5. Menambah jaringan kantor baru secara selektif untuk memperluas area geografis dan optimalisasi melalui evaluasi kinerja jaringan kantor cabang yang sudah ada sehingga dapat meningkatkan layanan nasabah, efisiensi, dan produktivitas;
6. Melanjutkan pengembangan inovasi dan layanan produk Bank guna memenuhi dan meningkatkan kebutuhan nasabah;
7. Mengurangi agunan yang diambil alih (AYDA) neto sehingga posisinya dapat turun menjadi lebih kurang Rp300,00 miliar di akhir tahun 2026, dan memperbaiki kualitas kredit dengan menekan rasio NPL secara neto menjadi 1,35% di akhir tahun 2026;

Strategies and Work Plans in 2026

As part of the ongoing strategic planning, Bank Victoria has established short-term targets for the next 1 (one) year and medium-term targets for the next 3 (three) years. These targets are prepared based on the Bank's vision and mission, strategic policy direction, internal condition evaluation, and external dynamics projected to impact banking industry. The strategies designed are aimed at ensuring healthy and continous business growth, maintaining profitability, and enhancing the Bank's competitiveness amidst the increasingly competitive industry conditions.

Bank Victoria's short-term targets for 2026, include the followings:

1. Maintaining Capital Adequacy Ratio (CAR) at a strong level of around 23.85% by the end of 2026 to anticipate potential risks and growth, as well as tighter capital regulations;
2. Increasing third-party funds (DPK) growth to around 5%, loans to around 7%, and total assets to around 6%, adjusting to the still-uncertain economic conditions with the potential for a slowdown;
3. Conducting Continuous Public Offering (PUB) for Continuing Bonds V and Subordinated Bonds IV with a maximum value of Rp3.00 trillion in 2026-2028;
4. Maintaining and increasing margin growth with an upward trend, namely net interest margin above 2.0% by controlling the cost of funds;
5. Adding new branch networks selectively to expand geographic coverage and optimize the performance of existing branch networks through performance evaluation to improve customer service, efficiency, and productivity;
6. Continuing the development of the Bank's product innovations and services to meet and enhance customer needs;
7. Reducing net foreclosed assets (AYDA) to approximately Rp300 billion by the end of 2026, and improving loan quality by reducing the net NPL ratio to 1.35% by the end of 2026;

8. Menerapkan dan mengembangkan sistem informasi manajemen berbasis teknologi informasi (TI) dengan kualitas standar keamanan tinggi yang diharapkan dapat menghadirkan layanan yang lebih baik dan lebih aman bagi nasabah; dan
9. Mengimplementasikan konsep perbaikan GCG dan manajemen risiko yang kuat dan memadai melalui implementasi yang berkelanjutan.

Sedangkan, target jangka menengah Bank Victoria untuk tahun 2026-2028 meliputi, antara lain:

1. Melanjutkan strategi pengembangan bisnis secara organik, terutama dengan ditopang pengembangan bisnis melalui sinergi Grup;
2. Memperbaiki struktur pendanaan khususnya komposisi DPK, dengan mendorong CASA (dana murah) lebih banyak sehingga mampu menurunkan *cost of fund*;
3. Melanjutkan komitmen penguatan GCG yang memadai sehingga berjalan maksimal dan sesuai dengan ketentuan regulator;
4. Melanjutkan investasi strategis dalam teknologi informasi yang diantaranya peningkatan proses, kontrol, kualitas layanan, dan produktivitas di dalam aktivitas penyelenggaraan teknologi informasi dan kegiatan operasional Bank guna mendukung pertumbuhan bisnis yang berkelanjutan dengan tetap menjaga beban operasional pada tingkat yang wajar; dan
5. Bank berkomitmen untuk menjadi lembaga keuangan yang memberikan pertumbuhan ekonomi dan bisnis yang berkesinambungan bagi seluruh masyarakat melalui layanan inklusi, memberikan dampak positif kepada masyarakat dengan meningkatkan literasi keuangan, memberikan kredit yang bertanggung jawab terhadap lingkungan, menciptakan kondisi kerja yang terbaik bagi karyawan Bank, serta menerapkan etika bisnis yang baik dengan mematuhi peraturan dan perundang-undangan yang berlaku dalam rangka mendorong keberhasilan Rencana Aksi Keuangan Berkelanjutan (RAKB).

8. Implementing and developing IT-based management information system with high security standards, which is expected to provide better and safer services to customers; and
9. Implementing a robust and adequate concept of GCG improvement and risk management through continuous implementation.

Meanwhile, Bank Victoria's medium-term targets for 2026-2028, include the followings:

1. Continuing the organic business development strategy, primarily supported by business development through Group synergies;
2. Improving funding structure, particularly DPK composition, by encouraging more CASA (low-cost funds) to reduce the cost of funds;
3. Continuing the commitment to strengthening GCG in an adequate manner so that it runs optimally and complies with regulatory requirements;
4. Continuing strategic investments in information technology, including improving processes, controls, service quality, and productivity within the Bank's information technology applications and operations to support sustainable business growth while maintaining operational costs at a reasonable level; and
5. The Bank is committed to being a financial institution that provides sustainable economic and business growth for the entire community through inclusive services, positively impacting society by increasing financial literacy, providing environmentally responsible loans, creating the best working conditions for the Bank's employees, and implementing good business ethics by complying with applicable laws and regulations to promote the success of Sustainable Finance Action Plan (RAKB).

Tinjauan Keuangan
Financial Overview

Laporan Posisi Keuangan
Statement of Financial Position

Aset
Assets

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

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(%)	
Aset Keuangan Financial Assets					
Kas	**46,336**	71,600	(25,264)	(35.28)	Cash
Giro pada Bank Indonesia	**1,238,091**	1,401,053	162,962	(11.63)	Current Accounts with Bank Indonesia
Giro pada Bank Lain	**317,275**	114,473	202,802	177.16	Current Accounts with Other Banks
Penempatan pada Bank Indonesia dan Bank Lain - Bersih	**1,405,032**	12,197	1,392,835	11,419.49	Placements with Bank Indonesia and Other Banks - Net
Efek-Efek - Bersih	**10,074,458**	7,462,723	2,611,735	35.00	Marketable Securities - Net
Efek-Efek yang Dibeli dengan Janji Dijual Kembali	**-**	197,776	(197,776)	(100.00)	Securities Purchased under Resale Agreement
Pendapatan Bunga yang Masih akan Diterima - Bersih	**325,114**	314,751	10,363	3.29	Interest Income Receivables - Net
Pinjaman yang Diberikan - Bersih	**21,821,520**	20,112,894	1,708,626	8.50	Loans - Net
Tagihan Akseptasi	**21,291**	17,792	3,499	19.67	Acceptance Receivables
Penyertaan Saham	**-**	219,934	(219,934)	(100.00)	Investments in Shares
Aset Lain-Lain - Bersih	**130,239**	171,114	(40,876)	(23.89)	Other Assets - Net
Total Aset Keuangan	**35,379,356**	**30,096,308**	**5,283,048**	**17.55**	**Total Financial Assets**
Aset Non Keuangan Non-Financial Assets					
Biaya Dibayar di Muka	**38,252**	31,144	7,109	22.83	Prepaid Expenses
Aset Tetap dan Aset Hak Guna - Bersih	**381,630**	391,434	(9,804)	(2.50)	Fixed Assets and Right-of-Use Assets - Net
Agunan yang Diambil Alih - Bersih	**295,722**	378,984	(83,262)	(21.97)	Foreclosed Assets - Net
Aset Tak Berwujud - Bersih	**13,641**	11,099	2,542	22.90	Intangible Assets - Net
Aset Pajak Tangguhan - Bersih	**93,096**	137,021	(43,925)	(32.06)	Deferred Tax Assets - Net
Total Aset Non-Keuangan	**822,341**	**949,681**	**(127,340)**	**(13.41)**	**Total Non-Financial Assets**
Total Aset	**36,201,697**	**31,045,989**	**5,155,708**	**16.61**	**Total Assets**

Total Aset

Total aset Bank Victoria tahun 2025 tercatat sebesar Rp36,20 triliun mengalami peningkatan sebesar 16,61% apabila dibandingkan dengan tahun 2024 yang sebesar Rp31,05 triliun. Hal ini terutama dipengaruhi oleh kenaikan total aset keuangan sebesar 17,55% menjadi Rp 35,58 triliun dari sebelumnya Rp30,10 triliun.

Total Assets

Bank Victoria's total assets in 2025 were recorded at Rp36.20 trillion, increased by 16.61% compared to Rp31.05 trillion in 2024. This was primarily driven by the increase in total financial assets of 17.55% from previously Rp30.10 trillion to Rp35.58 trillion.

Total Aset Keuangan

Bank mencatatkan aset keuangan senilai Rp35,38 triliun di akhir tahun 2025, meningkat 17,55% apabila dibandingkan akhir tahun 2024 yang mencapai Rp30,10 triliun. Peningkatan tersebut disebabkan oleh efek efek bersih yang mengalami kenaikan sebesar 35,00%.

Total Aset Non-Keuangan

Hingga akhir 2025, total aset non keuangan tercatat sebesar Rp822,34 miliar, mengalami penurunan sebesar Rp127,34 miliar atau 13,41% apabila dibandingkan tahun sebelumnya yang sebesar Rp949,68 miliar. Kondisi ini disebabkan oleh penurunan agunan yang diambil alih sebesar 21,97%.

Total Financial Assets

The Bank recorded financial assets worth Rp35.38 trillion at the end of 2025, increasing by 17.55% compared to that of the end of 2024 of Rp30.10 trillion. Such increase was driven by the increase in net marketable securities of 35.00%.

Total Non-Financial Assets

As of the end of 2025, the total non-financial assets were recorded at Rp822.34 billion, decreased by Rp127.34 billion or 13.41% compared to Rp949.68 in the previous year. This condition was due to the decline in foreclosed assets of 21.97%.

Liabilitas
Liabilities

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

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(Rp)	
Liabilitas Keuangan Financial Liabilities					
Simpanan Nasabah	**24,294,698**	23,332,112	962,586	4.13	Deposit from Customers
Simpanan dari Bank Lain	**2,580,560**	591,018	1,989,542	336.63	Deposits from Other Banks
Efek-Efek yang Dijual dengan Janji Dibeli Kembali	**693,569**	587,475	106,094	18.06	Securities Sold under Repurchase Agreement
Efek-Efek yang Diterbitkan	**3,922,381**	2,289,413	1,632,968	71.33	Securities Issued
Liabilitas Akseptasi	**21,291**	17,005	4,286	25.20	Acceptances Payable
Beban yang Masih Harus Dibayar	**127,215**	215,052	13,462	11.83	Accrued Expense
Liabilitas Lain-Lain	**99,404**		(1,895)	(1.87)	Other Liabilities
Total Liabilitas Keuangan	**31,739,119**	**27,032,074**	**4,707,045**	**17.41**	**Total Financial Liabilities**
Liabilitas Non-Keuangan Non-Financial Liabilities					
Utang Pajak	**29,424**	26,452	2,972	11.24	Taxes Payable
Liabilitas Imbalan Kerja Karyawan	**64,233**	54,003	10,230	18.94	Employee Benefits Obligation
Total Liabilitas Non-Keuangan	**93,657**	**80,455**	**13,202**	**16.41**	**Total Non-Financial Liabilities**
Total Liabilitas	**31,832,776**	**27,112,530**	**4,720,246**	**17.41**	**Total Liabilities**

Total Liabilitas

Per 31 Desember 2025, total liabilitas yang dicatatkan oleh Bank sebesar Rp31,83 triliun, lebih tinggi 17,41% jika dibandingkan posisi 31 Desember 2024 yang mencapai Rp27,11 triliun. Peningkatan ini disebabkan oleh simpanan dari bank lain dan efek-efek yang diterbitkan yang meningkat masing-masing sebesar 336,63% dan 71,33%.

Total Liabilitas Keuangan

Total liabilitas keuangan Bank tahun 2025 tercatat mengalami peningkatan sebesar 17,41%, dari sebelumnya sebesar Rp27,03 triliun pada akhir tahun 2024 menjadi sebesar

Total Liabilities

As of 31 December 2025, the Bank's total liabilities were recorded at Rp31.83 trillion, higher by 17.41% compared to the position as of 31 December 2024 of Rp27.11. This increase was due to deposits from other banks and securities issued, which increased by 336.63% and 71.33%, respectively.

Total Financial Liabilities

The Bank's total financial liabilities in 2025 increased by 17.41%, from Rp27.03 trillion at the end of 2024 to Rp31.74 trillion. Such increase came from deposits from

Rp31,74 triliun. Kenaikan tersebut berasal dari simpanan dari bank lain dan efek-efek yang diterbitkan yang meningkat masing-masing sebesar 336,63% dan 71,33%.

other banks and securities issued, which increased by 336.63% and 71.33%, respectively.

Total Liabilitas Non-Keuangan

Total liabilitas non keuangan Bank sampai dengan 31 Desember 2025 tercatat sebesar Rp93,66 miliar, jumlah tersebut lebih tinggi 16,41% apabila dibandingkan posisi 31 Desember 2024 yang mencapai Rp80,46 miliar. Hal tersebut berasal dari kenaikan liabilitas imbalan kerja karyawan sebesar 18,94%.

Total Non-Financial Liabilities

The Bank's total non-financial liabilities as of 31 December 2025 were recorded at Rp93.66 billion, higher by 16.41% compared to the position as of 31 December 2024 of Rp80.46 billion This was due to the increase in employee benefits obligation of 18.94%.

Ekuitas
Equity

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

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(Rp)	
Ekuitas yang Dapat Diatribusikan kepada Pemilik Entitas Induk Equity Attributable to Equity Holders of the Parent Entity					
Modal Ditempatkan dan Disetor Penuh	**1,841,942**	1,584,853	257,089	16.22	Issued and Fully Paid Capital
Tambahan Modal Disetor	**667,789**	668,371	(582)	(0.09)	Additional Paid-In Capital
Keuntungan/(kerugian) yang Belum Direalisasi atas Perubahan Nilai Wajar Efek-Efek yang Diukur pada Nilai Wajar Melalui Penghasilan Komprehensif Lain, Setelah Pajak	**28,293**	(25,504)	53,797	(210.94)	Unrealised gains/(losses) on Changes in Fair Value of Marketable Securities Measured at Fair Value Through Other Comprehensive Income, Net of Tax
Surplus Revaluasi Aset Tetap, Setelah Pajak	**299,310**	316,445	(17,135)	(5.41)	Gain on Revaluation of Fixed Assets, Net of Tax
Pengukuran Kembali atas Liabilitas Imbalan Kerja, Setelah Pajak	**4,471**	11,058	(6,587)	(59.57)	Remeasurements on Employee Benefit Liabilities, Net of Tax
Saldo Laba:					Retained Earnings:
Telah Ditentukan Penggunaannya	**252,200**	227,200	25,000	11.00	Appropriated
Belum Ditentukan Penggunaannya	**1,274,916**	1,151,036	123,880	10.76	Unappropriated
Total Ekuitas	**4,368,921**	**3,933,460**	**435,461**	**11.07**	**Total Equity**

Total Ekuitas

Pada tahun 2025, total ekuitas Bank Victoria meningkat 11,07%, menjadi Rp4,37 triliun dari semula Rp3,93 triliun. Hal ini terutama disebabkan oleh modal ditempatkan dan disetor penuh yang mengalami kenaikan sebesar 16,22% atau setara Rp257,09 miliar.

Total Equity

In 2025, Bank Victoria's total equity increased by 11.07%, to Rp4.37 trillion from previously Rp3.93 trillion This was primarily due to the increase in issued and fully paid capital of 16.22% or equivalent to Rp257.09 billion.

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

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

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(Rp)	
Pendapatan Bunga - Bersih	**2,302,354**	2,076,268	226,086	10.89	Interest Income
Beban Bunga	**(1,743,637)**	(1,527,667)	215,970	14.14	Interest Expense
Pendapatan Bunga Bersih	**558,717**	548,601	10,116	1.84	Interest income - Net

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(Rp)	
Pendapatan Operasional Lainnya	**533,277**	365,736	167,541	45.81	Other Operating Income
Beban Operasional Lainnya	**(870,026)**	(621,366)	248,660	40.02	Other Operating Expenses
Laba Operasional	**221,968**	292,970	71,002	(24.24)	Profit from Operations
Beban Non Operasional - Bersih	**(59,615)**	(144,310)	(84,695)	(58.69)	Non-Operating Expenses - Net
Laba Sebelum Beban Pajak Penghasilan	**162,354**	148,660	13,694	9.21	Profit Before Income Tax Expense
Beban Pajak Penghasilan - Bersih	**(30,609)**	(30,801)	(192)	(0.62)	Income Tax Expenses - Net
Laba Bersih Tahun Berjalan	**131,745**	117,859	13,886	11.78	Net Profit for the Year
Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan	**30,075**	(83,091)	113,166	136.20	Other Comprehensive Income (Loss), Net of Income Tax
Total Penghasilan Komprehensif	**161,820**	34,768	127,052	365.43	Total Comprehensive Income
Laba Bersih per Saham					Income per Share
Dasar (Rupiah penuh)	**7.15**	7.44	(0.29)	(3.90)	Basic (full Rupiah)
Dilusian (Rupiah penuh)	**7.15**	7.44	(0.29)	(3.90)	Diluted (full Rupiah)

Pendapatan Bunga

Pada tahun 2025, pendapatan bunga Bank tercatat sebesar Rp2,30 triliun, mengalami peningkatan sebesar 10,89% dibandingkan dengan tahun 2024 yang sebesar Rp2,08 triliun. Peningkatan pendapatan bunga sebagian besar berasal dari pinjaman yang diberikan yang meningkat sebesar 6,36% atau setara Rp105,82 miliar.

Interest Income

In 2025, the Bank's interest income was recorded at Rp2.30 trillion, an increase of 10.89% compared to Rp2.08 trillion in 2024. The increase in interest income was primarily from the increase in loans of 6.36% or equivalent to Rp105.82 billion.

Beban Bunga

Per akhir tahun 2025, beban bunga Bank Victoria tercatat mengalami peningkatan sebesar 14,14% menjadi Rp1,74 triliun dari Rp1,53 triliun pada akhir tahun 2024. Meningkatnya beban bunga bersumber dari beban bunga efek-efek yang diterbitkan yang meningkat sebesar 56,41%.

Interest Expense

As of the end of 2025, Bank Victoria's interest expense increased by 14.14% to Rp1.74 trillion from Rp1.53 trillion at the end of 2024. The increase in interest expense stemmed from the increase in interest expense on securities issued.

Pendapatan Bunga - Bersih

Pendapatan bunga - bersih merupakan hasil dari selisih antara pendapatan bunga dengan beban bunga. Pada tahun 2025, Bank mencatatkan pendapatan bunga – bersih sebesar Rp558,72 miliar, mengalami peningkatan sebesar 1,84% dibandingkan dengan tahun sebelumnya yang mencapai Rp548,60 miliar. Kondisi ini didorong oleh kenaikan pendapatan bunga pinjaman yang diberikan sebesar 6,36%.

Interest income - Net

Interest income - net is the result of the difference between interest income and interest expense. In 2025, the Bank recorded interest income of Rp558.72 billion, an increase of 1.87% compared to that of the previous year of Rp548.60 billion. This condition was driven by the increase in interest income on loans of 6.36%.

Pendapatan Operasional Lainnya

Per 31 Desember 2025, Bank mencatatkan pendapatan operasional lainnya sebesar Rp533,28 miliar, mengalami peningkatan 45,81% jika dibandingkan dengan periode 31 Desember 2024 yang tercatat sebesar Rp365,74 miliar. Kenaikan tersebut disebabkan oleh keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain – bersih.

Other Operating Income

As of 31 December 2025, the Bank recorded other operating income of Rp533.28 billion, an increase of 45.81% compared to the period of 31 December 2024 of Rp365.74 billion. This increase was due to gains on sale of securities measured at fair value through profit or loss and other comprehensive income – net.

Beban Operasional Lainnya
Bank mencatatkan nilai beban operasional lainnya pada tahun 2025 sebesar Rp870,03 miliar, tercatat meningkat sebesar Rp248.66 miliar atau 40,02% dibandingkan dengan tahun 2024 yang sebesar Rp621,37 miliar. Hal ini terutama dipengaruhi oleh pembentukan cadangan kerugian penurunan nilai kredit.

Laba Operasional
Laba operasional Bank Victoria pada periode 2025 tercatat mengalami penurunan sebesar 24,24% menjadi sebesar Rp221,97 miliar dari sebelumnya tercatat sebesar Rp292,97 miliar. Kondisi ini dipengaruhi oleh peningkatan beban operasional lainnya sebesar 40,02%.

Beban Non Operasional - Bersih
Beban non operasional - bersih per 31 Desember 2025 tercatat sebesar Rp59,62 miliar, mengalami penurunan sebesar 58,69% apabila dibandingkan tahun 2024 yang tercatat sebesar Rp144,31 miliar. Menurunnya beban non operasional - bersih dipengaruhi oleh rugi penjualan AYDA yang menurun sebesar 70,17%.

Laba Sebelum Beban Pajak Penghasilan
Hingga akhir 2025, laba sebelum beban pajak penghasilan Bank Victoria tercatat mengalami peningkatan sebesar 9,21% dari tahun 2024 yang tercatat sebesar Rp148,66 miliar menjadi Rp162,35 miliar di tahun 2025. Kenaikan ini terjadi dipengaruhi oleh penurunan beban non operasional – bersih sebesar 58,69%.

Beban Pajak Penghasilan - Bersih
Bank Victoria mencatatkan beban pajak penghasilan - bersih sebesar Rp30,61 miliar pada akhir periode 2025, menurun sebesar 0,62% bila dibandingkan tahun 2024 yang tercatat sebesar Rp30,80 miliar. Hal ini didorong oleh penurunan pajak tangguhan.

Laba Bersih Tahun Berjalan
Laba bersih tahun berjalan Bank Victoria sampai dengan 31 Desember 2025 tercatat sebesar Rp131,75 miliar, meningkat 11,78% apabila dibandingkan posisi 31 Desember 2024 yang mencapai Rp117,86 miliar. Hal ini terutama dipengaruhi oleh meningkatnya laba sebelum beban pajak penghasilan sebesar 9,21% dan penurunan beban pajak penghasilan - bersih sebesar 0,62%.

Penghasilan (Rugi) Komprehensif Lain, Setelah Pajak Penghasilan
Bank mencatatkan kenaikan penghasilan komprehensif lain, setelah pajak penghasilan senilai Rp113,17 miliar atau setara 136,19% dari mencatatkan rugi sebesar Rp83,09 miliar di tahun 2024 menjadi Rp30,08 miliar pada tahun 2025. Kenaikan ini terjadi karena perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan surplus revaluasi aset – bersih.

Other Operating Expenses
The Bank recorded other operating expenses in 2025 of Rp870.03 billion, an increase of Rp248.66 billion or 40.02% compared to Rp621.37 billion in 2024. This was primarily driven by the establishment of allowance for impairment losses on loans.

Profit from Operations
Bank Victoria's profit from operations in 2025 was recorded decreasing by 24.24% to Rp221.97 billion from previously Rp292.97 billion. TThis condition was driven by the increase in other operating expenses of 40.02%.

Non-Operating Expenses - Net
Non-operational expenses - net as of 31 December 2025 were recorded at Rp59.62 billion, a decrease of 58.69% compared to that of 2024 of Rp144.31 billion. The decrease in non-operating expenses – net was driven by the decline in losses on the sale of Foreclosed Assets (AYDA) of 70.17%.

Profit Before Income Tax Expense
Until the end of 2025, Bank Victoria's profit before income tax expense increased by 9.21% from Rp148.66 billion in 2024 to Rp162.35 billion in 2025. This increase was driven by the decrease in non-operating expenses –net of 58.69%.

Income Tax Expenses - Net
Bank Victoria recorded income tax expenses - net of Rp30.61 billion at the end of 2025, a decrease of 0.62% compared to Rp30.80 billion in 2024. This was driven by the decrease in deferred tax.

Net Profit for the Year
Bank Victoria's net profit for the year as of 31 December 2025 was recorded at Rp131.75 billion, an increase of 11.78% compared to Rp117.86 billion as of 31 December 2024. This was primarily driven by the increase in profit before income tax expense of 9.21% and the decrease in income tax expenses – net of 0.62%.

Other Comprehensive Income (Loss), Net of Income Tax
The Bank recorded an increase in other comprehensive income, net of income tax of Rp113.17 billion or equivalent to 136.19% from Rp83.09 billion in 2024 to R30.08 billion in 2025. This increase occurred due to changes in fair value of marketable securities measured at fair value through other comprehensive income and gain from revaluation asset – net.

Total Penghasilan Komprehensif

Hingga akhir 2025, jumlah penghasilan komprehensif Bank tercatat mengalami peningkatan signifikan sebesar 365,43% dari tahun 2024 yang tercatat Rp34,77 miliar menjadi Rp161,82 miliar di tahun 2025. Kenaikan ini dipengaruhi oleh meningkatnya penghasilan komprehensif lain, setelah pajak penghasilan sebesar Rp113,17 miliar atau setara 136,19%.

Total Comprehensive Income

Until the end of 2025, the Bank's comprehensive income recorded a significant increase of 365.43% from Rp34.77 billion in 2024 to Rp161.82 billion in 2025. This increase was influenced by the increase in other comprehensive income, net of income tax of Rp113.17 billion or equivalent to 136.19%.

Laporan Arus Kas
Statements of Cash Flows

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

Uraian	2025	2024	Kenaikan (Penurunan) Increase (Decrease)		Description
			(Rp)	(Rp)	
Arus Kas Bersih Diperoleh dari/ (Digunakan untuk) Aktivitas Operasi	**1,757,587**	(942,316)	2,699,903	(286.52)	Net Cash Flow Provided from/ (Used in) Operating Activities
Arus Kas Bersih Digunakan untuk Aktivitas Investasi	**(2,240,713)**	(1,193,957)	(1,046,756)	87.67	Net Cash Flow Used in Investing Activities
Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan	**1,890,558**	937,081	953,477	101.75	Net Cash Flow Provided from Financing Activities
Kenaikan/(penurunan) Bersih Kas dan Setara Kas	**1,407,432**	(1,199,193)	2,606,625	(217.36)	Net Increase/(Decrease) in Cash and Cash Equivalents
Kas dan Setara Kas pada Awal Tahun	**1,599,371**	2,798,564	(1,199,193)	(42.85)	Cash and Cash Equivalents at Beginning of Year
Kas dan Setara Kas pada Akhir Tahun	**3,006,803**	1,599,372	1,407,431	88.00	Cash and Cash Equivalents at End of the Year

Arus Kas Bersih (Digunakan untuk)/Diperoleh dari Aktivitas Operasi

Arus kas bersih yang diperoleh dari aktivitas operasi Bank pada tahun 2025 tercatat sebesar Rp1,76 triliun, meningkat signifikan sebesar 286,52% dibandingkan tahun sebelumnya yang sebesar Rp942,32 miliar. Peningkatan ini terutama berasal dari kenaikan dalam kewajiban operasi simpanan dari bank lain sebesar 487,23%.

Net Cash Flow Provided by/(Used in) Operating Activities

Net cash flow provided by the Bank's operating activities in 2025 was recorded at Rp1.76 trillion, increased significantly by 286.52% compared to that of the previous year of Rp942.32 billion. This increase was primarily due to the increase in operating liabilities of deposits from other banks of 487.23%.

Arus Kas Bersih Digunakan untuk Aktivitas Investasi

Pada tahun 2025, arus kas bersih yang digunakan untuk aktivitas investasi tercatat sebesar Rp2,24 triliun, mengalami kenaikan sebesar 87,67% dibandingkan dengan tahun 2024 yang mencapai Rp1,19 triliun. Peningkatan ini terutama disebabkan oleh adanya penerimaan dari penyertaan saham sebesar Rp322,49 miliar.

Net Cash Flow Used in Investing Activities

In 2025, net cash flow used in investing activities was recorded at Rp2.24 trillion, an increase of 87.67% compared to Rp1.19 trillion in 2024. This increase was primarily due to receive from investment in shares of Rp322.49 billion.

Arus Kas Bersih Diperoleh dari Aktivitas Pendanaan

Sepanjang tahun 2025, Bank Victoria mencatatkan arus kas bersih yang diperoleh dari aktivitas pendanaan senilai Rp1,89 triliun, meningkat 101,75% apabila dibandingkan tahun sebelumnya yang mencapai Rp937,08 miliar. Hal ini terutama dipengaruhi oleh penambahan modal disetor dan penerbitan obligasi.

Net Cash Flow Provided from Financing Activities

Throughout 2025, Bank Victoria recorded net cash flow provided from financing activities of Rp1.89 trillion, increasing by 101.75% compared to that of the previous year of Rp937.08 billion. This was primarily influenced by additional paid-in capital and bond issuance.

Rasio Keuangan Penting

Dalam rangka menjaga stabilitas dan kesehatan keuangan, Bank secara berkelanjutan memastikan pemenuhan terhadap berbagai indikator kunci yang diatur oleh regulator, di antaranya rasio permodalan, rasio aset produktif, rasio rentabilitas, rasio likuiditas, dan rasio kepatuhan secara berkelanjutan sebagaimana diuraikan pada tabel berikut:

Significant Financial Ratios

To maintain financial stability and health, the Bank continuously ensures compliance with various key indicators set by regulators, including capital ratio, earning asset ratio, profitability ratio, liquidity ratio, and compliance ratio, as outlined in the following table:

Tabel Rasio Keuangan Penting
Table of Significant Financial Ratios

(dalam % / in %)

Uraian	2025	2024	Description
Rasio Kinerja **Performance Ratio**			
KPMM untuk Risiko Kredit, Operasional, dan Pasar	**23.84**	21.53	CAR for Credit, Operational, and Market Risks
Aset Produktif Bermasalah dan Aset Non-Produktif Bermasalah terhadap Total Aset Produktif dan Non-Produktif	**2.11**	3.04	Non-Performing Earning Assets and Non-Performing Non-Earning Assets to Total Earning Assets and Non-Earning Assets
Aset Produktif Bermasalah terhadap Total Aset Produktif	**1.63**	2.35	Non-Performing Earning Assets to Total Earning Assets
CKPN Aset Keuangan terhadap Aset Produktif	**1.64**	1.57	CKPN of Financial Assets to Earning Assets
NPL Bruto	**2.49**	3.27	Gross NPL
NPL Neto	**1.73**	2.36	Net NPL
ROA	**0.50**	0.51	ROA
ROE	**3.41**	3.41	ROE
NIM	**2.05**	2.22	NIM
BOPO	**92.17**	88.00	BOPO
Cost to Income Ratio (CIR)	**48.41**	55.35	Cost to Income Ratio (CIR)
LDR	**92.12**	88.12	LDR
LR secara Individual	**10.60**	11.04	Individual LR
Rasio Pinjaman terhadap Pendanaan (LFR)	**84.32**	86.27	Loan to Funding Ratio (LFR)
Rasio Dana Murah (CASA)	**29.33**	26.58	Low-Cost Funds Ratio (CASA)
Rasio Kepatuhan **Compliance Ratios**			
Persentase Pelanggaran BMPK			Percentage of LLL Violation
Pihak Terkait	**0.00**	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	Non-Related Parties
Persentase Pelampauan BMPK			Percentage of LLL Excess
Pihak Terkait	**0.00**	0.00	Related Parties
Pihak Tidak Terkait	**0.00**	0.00	Non-Related Parties
Giro Wajib Minimum (GWM) Bank Umum - Konvensional			Minimum Statutory Reserve (GWM) of Commercial Bank - Conventiona
Rupiah			Rupiah
GWM*	**4.58**	6.67	GWM*

Uraian	2025	2024	Description
Penyangga Likuiditas Makroprudensial**	**23.29**	21.78	Macroprudential Liquidity Buffer**
Rasio Intermediasi Makroprudensial***	**1.89**	4.76	Macroprudential Intermediation Ratio***
Valuta Asing	**4.05**	4.05	Foreign Currencies
Posisi Devisa Neto (PDN) secara Keseluruhan	**0.10**	0.21	Net Open Position (PDN) in Overall

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

Kemampuan Membayar Utang dan Kolektibilitas Piutang

Dalam rangka memastikan kemampuan Bank dalam memenuhi seluruh kewajiban keuangannya, baik jangka pendek maupun jangka panjang, Bank secara konsisten melakukan pengukuran dan evaluasi melalui sejumlah indikator keuangan utama. Indikator tersebut mencakup rasio likuiditas, rasio solvabilitas, rasio kepatuhan, serta rasio rentabilitas, yang masing-masing berfungsi sebagai parameter penting dalam menilai kemampuan Bank dalam menjaga kestabilan operasional dan menyediakan cadangan likuiditas yang memadai. Adapun kinerja rasio-rasio tersebut selama tahun 2025 dipaparkan sebagai berikut:

1. **Rasio Likuiditas**
   Kemampuan Bank Victoria dalam memenuhi kewajiban jangka pendek diukur melalui rasio likuiditas, khususnya rasio pinjaman terhadap dana pihak ketiga *(Loan to Deposit Ratio/LDR)*. Pada tahun 2025, LDR Bank Victoria tercatat sebesar 92,12%, mengalami peningkatan dibandingkan posisi tahun 2024 yang sebesar 88,12%. Capaian tersebut secara umum menunjukkan bahwa kondisi likuiditas Bank tetap berada dalam posisi yang optimal dan sehat, mengingat nilai LDR tersebut masih berada dalam rentang batas yang ditetapkan oleh Bank Indonesia.

2. **Rasio Solvabilitas**
   Rasio solvabilitas Bank diukur melalui Rasio Kewajiban Penyediaan Modal Minimum (KPMM) sebagai indikator kecukupan modal dalam menanggung risiko kredit, operasional, dan pasar. Pada akhir tahun 2025, rasio KPMM Bank Victoria tercatat sebesar 23,84%, tercatat lebih tinggi dibandingkan tahun 2024 yang sebesar 21,53%. Capaian ini mencerminkan posisi permodalan Bank yang kuat dan memadai, karena rasio KPMM masih berada di atas ambang batas minimum yang ditetapkan oleh regulator.

3. **Rasio Kepatuhan**
   Pada akhir tahun 2025, Bank Victoria mencatat rasio GWM primer sebesar 4,58% untuk mata uang Rupiah dan 4,05% untuk valuta asing pada segmen bank konvensional. Rasio GWM RIM tercatat sebesar 4,76%,

Solvency and Receivables Collectability

To ensure the Bank's ability to meet all financial obligations, both short-term and long-term, the Bank consistently measures and evaluates several key financial indicators. These indicators include liquidity ratio, solvency ratio, compliance ratio, and profitability ratio, each of which serves as a key parameter in assessing the Bank's ability to maintain operational stability and provide adequate liquidity reserves. The performance of such ratios throughout 2025 is presented as follows:

1. **Liquidity Ratio**
   Bank Victoria's ability to meet short-term obligations is measured through liquidity ratio, specifically Loan to Deposit Ratio (LDR). In 2025, Bank Victoria's LDR was recorded at 92.12%, increasing compared to 88.12% in 2024. This achievement generally indicates that the Bank's liquidity remains optimal and healthy, given that the LDR remains within the limits set by Bank Indonesia.

2. **Solvency Ratio**
   The Bank's solvency ratio is measured through Capital Adequacy Ratio (CAR) as a capital adequacy indicator to cover credit, operational, and market risks. At the end of 2025, Bank Victoria's CAR was recorded at 23.84%, higher/lower than that of 2024 of 21.53%. This achievement reflects the Bank's strong and adequate capital position, as the CAR remained above the minimum threshold set by the regulator.

3. **Compliance Ratio**
   At the end of 2025, Bank Victoria recorded primary GWM ratio of 4.58% for Rupiah and 4.05% for foreign currency in conventional banking segment. The GWM RIM ratio was recorded at 4.76%, while

sedangkan rasio GWM PLM mencapai 23,29%. Capaian tersebut menunjukkan bahwa Bank dengan konsisten telah memenuhi seluruh ketentuan Bank Indonesia terkait GWM untuk bank umum konvensional pada periode 31 Desember 2025 maupun 2024, yang mencerminkan kepatuhan Bank dalam menjaga likuiditas dan stabilitas operasional sesuai regulasi yang berlaku.

4. **Rasio Rentabilitas**
   Bank Victoria mengukur efektivitas dalam menghasilkan laba melalui beberapa rasio kunci, yakni *Return on Assets* (ROA), *Return on Equity* (ROE), *Net Interest Margin* (NIM), dan rasio Beban Operasional terhadap Pendapatan Operasional (BOPO). Per 31 Desember 2025, rasio ROA, ROE, NIM, dan BOPO masing-masing tercatat sebesar 0,50%, 3,41%, 2,05%, dan 92,17%, sedangkan pada tahun 2024 tercatat masing-masing sebesar 0,51%, 3,41%, 2,22%, dan 88,00%. Pencapaian ini menggambarkan peningkatan yang konsisten dalam profitabilitas serta efisiensi operasional Bank.

5. **Kemampuan Membayar Utang dari Obligasi yang Diterbitkan**
   Kemampuan Bank dalam memenuhi kewajiban atas utang juga tercermin dari peringkat atas efek-efek yang diterbitkan, khususnya obligasi. Untuk menjaga kredibilitas dan mendukung kelayakan investasinya, obligasi yang diterbitkan oleh Bank Victoria secara rutin dinilai oleh lembaga pemeringkat independen. Kualitas efek tersebut sangat bergantung pada kemampuan Bank dalam membayar pokok dan kupon secara tepat waktu selama periode penerbitan. Saat ini, obligasi Bank Victoria telah dicatatkan di Bursa Efek Indonesia.

6. **Kolektibilitas Piutang**
   Tingkat kolektibilitas piutang Bank diukur melalui rasio NPL, yang menggambarkan persentase kredit bermasalah dari total kredit yang diberikan kepada nasabah. Semakin rendah nilai NPL, semakin baik kinerja Bank dalam mengelola kolektibilitas piutang, yang mencerminkan kualitas kredit yang sehat dan pengelolaan risiko yang efektif. Bank Victoria senantiasa menjaga rasio NPL tetap berada di bawah batas maksimum 5,00% sesuai ketentuan Bank Indonesia. Pada akhir tahun 2025, Bank berhasil mencatatkan NPL bruto sebesar 2,49% dan NPL neto sebesar 1,73%, mengalami perbaikan dibandingkan dengan tahun 2024 yang

GWM PLM ratio reached 23.29%. These achievements demonstrate that the Bank has consistently complied with all Bank Indonesia regulations regarding GWM for conventional commercial banks for the period of 31 December 2025 and 2024, thus reflecting the Bank's compliance in maintaining liquidity and operational stability in accordance with applicable regulations.

4. **Profitability Ratio**
   Bank Victoria measures its effectiveness in generating profits through several key ratios, namely Return on Assets (ROA), Return on Equity (ROE), Net Interest Margin (NIM), and Operating Expenses to Operating Income (BOPO) ratio. As of 31 December 2025, ROA, ROE, NIM, and BOPO ratios were recorded at 0.50%, 3.41%, 2.05%, and 92.17%, Meanwhile, in 2024, these were recorded at 0.51%, 3.41%, 2.22%, and 88.00%, respectively. These achievements demonstrate a consistent increase in the Bank's profitability and operational efficiency.

5. **Ability to Pay Debt from Bonds Issued**

   The Bank's ability to meet its debt obligations is also reflected in the ratings of the securities issued, particularly bonds. To maintain credibility and support its investment feasibility, bonds issued by Bank Victoria are regularly assessed by an independent rating agency. The quality of such securities is highly dependent on the Bank's ability to pay principal and coupons on time during the issuance period. Currently, Bank Victoria's bonds are listed on Indonesia Stock Exchange.

6. **Receivables Collectability**
   The Bank's receivables collectability is measured by NPL ratio, which represents the percentage of non-performing loans out of total loans to customers. The lower the NPL, the better the Bank's performance in managing receivables collectablity, reflecting healthy credit quality and effective risk management. Bank Victoria consistently maintains its NPL ratio below the maximum limit of 5.00% as stipulated by Bank Indonesia. At the end of 2025, the Bank recorded gross NPL of 2.49% and net NPL of 1.73%, improving compared to 3.27% and 2.36% in 2024. Based on Bank

masing-masing tercatat sebesar 3,27% dan 2,36%. Berdasarkan peraturan Bank Indonesia, pinjaman yang dikelola oleh Bank diklasifikasikan berdasarkan kolektibilitasnya dalam beberapa kategori sebagai berikut:

Indonesia regulations, loans managed by the Bank are classified based on their collectability into several categories, as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025		2024		Description
	Pokok Principal	Cadangan Allowance	Pokok Principal	Cadangan Allowance	
Lancar	**20,943,526**	**211,123**	19,197,769	146,102	Current
Dalam Perhatian Khusus	**879,921**	**177,661**	688,874	112,644	Special Mention
Kurang Lancar	**47,189**	**7,154**	62,186	22,339	Substandard
Diragukan	**662**	**285**	5,103	1,387	Doubtful
Macet	**508,868**	**162,423**	605,929	164,494	Loss
Total	**22,380,166**	**(558,646)**	**20,559,860**	**(446,966)**	**Total**

Kontribusi kepada Negara

Bank Victoria menyalurkan kontribusi signifikan kepada negara melalui pemenuhan kewajiban perpajakan sebagai wajib pajak yang taat. Pemenuhan kewajiban ini mencerminkan komitmen Bank dalam menjalankan tanggung jawab sosial dan kepatuhan terhadap peraturan perundang-undangan yang berlaku. Rincian pembayaran pajak Bank Victoria selama 2 (dua) tahun terakhir disajikan dalam tabel berikut:

Contribution to the State

Bank Victoria makes significant contributions to the state by fulfilling its tax obligations as a compliant taxpayer. Fulfillment of these obligations reflects the Bank's commitment to social responsibility and compliance with applicable laws and regulations. Details of Bank Victoria's tax payments for the past 2 (two) years are presented in the following table:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	Description
PPh Pasal 4 ayat 2	**296,892**	258,455	Income Tax Article 4 paragraph 2
PPh Pasal 21	**24,834**	19,164	Income Tax Article 21
PPh Pasal 23	**1,338**	1,078	Income Tax Article 23
PPh Pasal 25	**-**	-	Income Tax Article 25
PPh Pasal 26	**309**	293	Income Tax Article 26
PPN	**440**	4,233	VAT
Amnesti Pajak	**-**	-	Tax Amnesty
Total	**323,813**	**283,223**	**Total**

Struktur Modal dan Kebijakan Struktur Modal

Kebijakan Manajemen atas Struktur Modal dan Dasar Pemilihannya

Bank Victoria memiliki kebijakan pengelolaan modal untuk memastikan tersedianya modal yang kuat guna mendukung strategi ekspansi usaha saat ini dan mempertahankan keberlanjutan pengembangan di masa mendatang. Selain itu, kebijakan permodalan juga ditujukan untuk memenuhi ketentuan kecukupan modal yang ditetapkan oleh regulator serta menjaga agar struktur permodalan Bank tetap efisien.

Capital Structure and Capital Structure Policy

Management Policy on Capital Structure and Basis of Selection

Bank Victoria has a capital management policy to ensure the availability of strong capital to support current business expansion strategy and maintain sustainable development in the future. In addition, the capital policy is also aimed at meeting the capital adequacy requirements set by the regulator and maintaining the Bank's capital structure to remain efficient.

Bank secara berkala menyusun rencana permodalan berdasarkan penelaahan atas kebutuhan kecukupan modal yang dipersyaratkan, dikombinasikan dengan evaluasi terhadap perkembangan kondisi ekonomi terkini. Rencana tersebut disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Sepanjang periode pelaporan, Bank telah mematuhi seluruh ketentuan modal yang ditetapkan oleh regulator, khususnya terkait perhitungan KPMM dan Aset Tertimbang Menurut Risiko (ATMR).

The Bank periodically prepares a capital plan based on a review of the required capital adequacy requirements, combined with an evaluation of current economic developments. The plan is prepared by the Board of Directors as part of the Bank's Business Plan and approved by the Board of Commissioners. Throughout the reporting period, the Bank has complied with all capital requirements set by the regulator, particularly regarding the calculation of the CAR and Risk Weighted Assets (RWA).

Rincian Struktur Modal

Perhitungan kecukupan modal Bank Victoria dilakukan sesuai dengan ketentuan yang berlaku dari Bank Indonesia, dengan mengklasifikasikan modal ke dalam 2 (dua) kelompok utama, yaitu Modal *Tier* I dan Modal *Tier* II. Penilaian kecukupan modal ini mempertimbangkan eksposur terhadap risiko kredit, risiko operasional, dan risiko pasar guna memastikan ketahanan keuangan Bank dalam menghadapi potensi tekanan risiko.

Details of Capital Structure

Bank Victoria's capital adequacy is calculated in accordance with the applicable Bank Indonesia regulations, classifying capital into 2 (two) main groups, namely Tier I Capital and Tier II Capital. This capital adequacy assessment considers exposure to credit risk, operational risk, and market risk to ensure the Bank's financial resilience in facing potential risk pressures.

Rincian struktur modal Bank Victoria per 31 Desember 2024 dan 2025 disajikan dalam tabel berikut sebagai bentuk transparansi dan akuntabilitas dalam pengelolaan permodalan.

Details of Bank Victoria's capital structure as of 31 December 2024 and 2025 are presented in the following table to demonstrate transparency and accountability in capital management.

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

Uraian	2025	2024	Description
Modal Inti (*Tier* I)	**4,000,450**	3,584,008	Core Capital (Tier I)
Modal Pelengkap (*Tier* II)	**1,129,545**	833,933	Supplementary Capital (Tier II)
Total Modal	**5,129,996**	**4,417,941**	**Total Capital**
ATMR untuk Risiko Kredit	**19,283,626**	18,182,056	RWA for Credit Risk
ATMR untuk Risiko Operasional	**1,603,180**	1,555,658	RWA for Operational Risk
ATMR untuk Risiko Pasar	**627,275**	785,592	RWA for Market Risk
Risiko KPMM untuk Risiko Kredit dan Risiko Operasional (%)	**24.56**	22.38	CAR with Credit and Operational Risks (%)
Risiko KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	**23.84**	21.53	CAR with Credit, Operational, and Market Risks (%)
Rasio KPMM yang Diwajibkan (%)	**9.00**	9.00	Minimum CAR Required (%)

Ikatan Material terkait Investasi Barang Modal

Sepanjang periode 2025, Bank Victoria tidak memiliki ikatan material yang berkaitan dengan investasi barang modal. Oleh karena itu, tidak terdapat informasi yang dapat disampaikan terkait aktivitas investasi tersebut dalam periode pelaporan ini.

Material Commitments related to Capital Goods Investment

Throughout 2025, Bank Victoria did not have any material commitments related to capital goods investments. Therefore, there is no information that can be provided on these investment activities during this reporting period.

Realisasi Investasi Barang Modal

Investasi barang modal merupakan pengeluaran dana yang dialokasikan untuk perolehan atau peningkatan nilai aset tetap guna mendukung operasional dan memberikan manfaat ekonomi di masa depan. Bagi Bank Victoria, investasi ini difokuskan pada peningkatan kualitas layanan kepada nasabah, serta memperkuat infrastruktur dan sarana pendukung guna menunjang pertumbuhan usaha Bank secara berkelanjutan. Seluruh transaksi belanja modal dilakukan dalam mata uang Rupiah, sehingga tidak menimbulkan eksposur terhadap risiko nilai tukar mata uang asing. Rincian investasi barang modal yang dilakukan Bank Victoria selama 2 (dua) tahun terakhir diuraikan sebagai berikut:

Realization of Capital Goods Investment

Capital goods investment is expenditures allocated to acquire or increase fixed assets value to support operations and provide future economic benefits. For Bank Victoria, this investment is focused on improving service quality to customers and strengthening infrastructure and support facilities to support the Bank's sustainable business growth. All capital expenditure transactions are conducted in Rupiah, thus avoiding exposure to foreign exchange risk. Details of capital goods investment carried out by Bank Victoria throughout the past 2 (two) years are outlined as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	Description
Bangunan	**6,028**	2,673	Buildings
Kendaraan Bermotor	**-**	2,885	Vehicles
Mesin-Mesin dan Peralatan	**10,034**	13,870	Machinery and Equipment
Perlengkapan dan Perabotan Kantor	**162**	373	Office Furniture and Equipment
Aset Tetap dalam Proses Pembangunan	**5**	-	Assets under Constructions
Total	**16,229**	**19,802**	**Total**

Derivatif dan Fasilitas Lindung Nilai

Pada akhir tahun 2024 dan 2025, Bank Victoria tidak melakukan aktivitas atau transaksi keuangan yang berkaitan dengan instrumen derivatif maupun fasilitas lindung nilai. Dengan demikian, tidak terdapat informasi yang dapat disajikan terkait hal tersebut dalam Laporan Tahunan ini.

Derivative and Hedging Facilities

At the end of 2024 and 2025, Bank Victoria did not engage in any financial activities or transactions related to derivative instruments or hedging facilities. Therefore, there is no information that can be presented regarding this matter in this Annual Report.

Dampak Perubahan Tingkat Suku Bunga terhadap Kinerja Bank Tahun 2025

Perubahan tingkat suku bunga acuan oleh Bank Indonesia sepanjang tahun 2025 memberikan dampak yang cukup signifikan terhadap kinerja industri perbankan, termasuk Bank Victoria. Perubahan ini memengaruhi berbagai aspek operasional, terutama dalam hal penetapan suku bunga kredit dan dana pihak ketiga, yang pada akhirnya berdampak pada NIM, pertumbuhan kredit, serta pengelolaan likuiditas. Sepanjang tahun 2025, Bank Indonesia beberapa kali melakukan penyesuaian suku bunga acuan atau BI *7-Day Reverse Repo Rate* (BI7DRR), yang menurun dari 5,75% menjadi 5,50% pada Mei 2025, kembali diturunkan menjadi 5,00% pada Agustus 2025, serta mengalami penurunan lanjutan menjadi 4,75% pada September 2025 dan dipertahankan pada level tersebut hingga Desember 2025.

Impact of Changes of Interest Rates to Bank Performance in 2025

Changes in Bank Indonesia's benchmark interest rate throughout 2025 significantly impacted banking industry's performance, including Bank Victoria. These changes impacted various operational aspects, particularly in determining credit interest rates and third-party funds, which eventually impacted NIM, credit growth, and liquidity management. Throughout 2025, Bank Indonesia made several adjustments to its benchmark interest rate or BI 7-Day Reverse Repo Rate (BI7DRR), which decreased from 5.75% to 5.50% in May 2025, then decreased again to 5.00% in August 2025, and further lowered to 4.75% in September 2025, where it remained at that level until December 2025. Going forward, Bank Indonesia will continue to monitor

Ke depannya, Bank Indonesia akan terus mencermati ruang penurunan suku bunga untuk mendorong pertumbuhan ekonomi yang lebih tinggi sejalan dengan rendahnya prakiraan inflasi dengan tetap mempertahankan stabilitas nilai tukar Rupiah.

the opportunity for interest rate cuts to encourage higher economic growth in line with low inflation forecast while maintaining the stability of Rupiah exchange rate.

Perbandingan Target dan Realisasi Tahun 2025

Memasuki tahun 2025, Bank Victoria telah merumuskan dan menetapkan berbagai target strategis sebagai bagian dari pelaksanaan Rencana Bisnis Bank (RBB). Penyusunan target tersebut dilakukan secara komprehensif dengan mempertimbangkan perkembangan terkini di sektor perekonomian nasional maupun kondisi industri perbankan, termasuk potensi risiko dan peluang yang dapat memengaruhi kinerja usaha. Berikut pencapaian kinerja Bank Victoria terhadap target-target utama yang telah ditetapkan dalam RBB tahun 2025:

Comparison of Target and Realization in 2025

Entering 2025, Bank Victoria formulated and set various strategic targets as part of its Bank Business Plan (RBB) implementation. These targets were prepared comprehensively, by considering the latest developments in national economy and banking industry, including potential risks and opportunities that could impact business performance. The following is Bank Victoria's performance towards main targets set in the 2025 RBB:

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

Uraian	Target RBB 2025 RBB Target in 2025	Realisasi 2025 Realization in 2025	Pencapaian Achievement (%)	Description
Kinerja Keuangan **Financial Performance**				
Total Aset	34,198	**36,202**	105.86	Total Assets
Total Liabilitas	29,817	**31,833**	106.76	Total Liabilities
Total Ekuitas	4,380	**4,369**	99.75	Total Equity
Pendapatan Bunga - Bersih	557	**559**	100.31	Interest Income - Net
Pendapatan (Beban) Operasional selain Bunga - Bersih	(276)	**(337)**	122.10	Operating Income (Expenses) other than Interest - Net
Laba Operasional	281	**222**	78.99	Profit from Operations
Laba Bersih Tahun Berjalan	156	**132**	84.45	Net Profit for the Year
Rasio Keuangan (dalam %) **Financial Ratios (in %)**				
KPMM dengan Memperhitungkan Risiko Kredit dan Operasional	24.89	**24.56**	98.67	CAR by Calculating Credit and Operational Risks
KPMM dengan Memperhitungkan Risiko Kredit, Operasional, dan Pasar	24.02	**23.84**	99.25	CAR by Calculating Credit, Operational, and Market Risks
NIM	2.01	**2.05**	101.99	NIM
LDR	87.01	**92.12**	105.87	LDR
ROA	0.61	**0.50**	81.97	ROA
ROE	4.00	**3.41**	85.25	ROE
NPL Bruto	2.50	**2.49**	99.60	Gross NPL
Rasio BOPO	89.47	**92.17**	103.02	BOPO
Kinerja Operasional **Operational Performance**				
Produk Simpanan				**Deposits Products**
Tabungan	3,604	**3,776**	104.77	Savings Deposits

Uraian	Target RBB 2025 RBB Target in 2025	Realisasi 2025 Realization in 2025	Pencapaian Achievement (%)	Description
Giro	3,327	**3,350**	100.71	Demand Deposits
Deposito Berjangka	17,783	**17,129**	96.32	Time Deposits
Negotiable Certificate Deposits	39	**39**	100.80	Negotiable Certificate Deposits
Total Produk Simpanan	**24,754**	**24,295**	**98.14**	**Total Deposits Products**
Produk Pinjaman				**Loan Products**
Pinjaman Tetap	10,566	**10,885**	103.02	Fixed Loans
Pinjaman Konsumen	175	**178**	101.94	Consumer Loans
Pinjaman Rekening Koran	2,223	**1,947**	87.58	Overdraft Loans
Pinjaman Tetap dengan Angsuran	8,496	**9,298**	109.44	Fixed Loans with Installments
Pinjaman Serba Guna	78	**72**	92.74	Multi Purpose Loans
Total Produk Pinjaman	**21,538**	**22,380**	**103.91**	**Total Loan Products**

Proyeksi Tahun 2026

Bank Victoria telah menetapkan sejumlah proyeksi kinerja keuangan yang tertuang dalam RBB Tahun 2026. Proyeksi tersebut disusun dengan mempertimbangkan perkembangan terkini di sektor ekonomi dan industri perbankan, termasuk kondisi makroekonomi nasional, tren pasar, serta potensi risiko dan peluang di tahun mendatang. Informasi terkait proyeksi untuk dicapai pada tahun 2026, diuraikan sebagai berikut:

Projections for 2026

Bank Victoria has established several financial performance projections, as outlined in the 2026 RBB. These projections are prepared by considering the latest developments in economic sector and banking industry, including national macroeconomic conditions, market trends, and potential risks and opportunities in the coming year. Information on projections to be achieved in 2026 is outlined below:

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

Uraian	Proyeksi RBB 2026 RBB Projection 2026	Description
Ringkasan Neraca **Summary of Balance Sheet**		
Total Aset	**37,087**	**Total Assets**
Efek-Efek	**10,161**	Marketable Securities
Kredit yang Diberikan	**23,008**	Loans
Agunan yang Diambil Alih	**220**	Foreclosed Assets
Komponen Aset Lainnya	**3,698**	Other Components of Assets
Total Liabilitas	**32,516**	**Total Liabilities**
Total Dana Pihak Ketiga	**25,702**	Total Third-Party Funds
Giro	**3,624**	Demand Deposits
Tabungan	**4,087**	Savings Deposits
Deposito	**17,991**	Time Deposits
Efek-Efek yang Diterbitkan	**3,834**	Securities Issued
Komponen Liabilitas Lainnya	**2,980**	Other Components of Liability
Total Ekuitas	**4,571**	**Total Equity**
Modal Disetor dan Tambahan Modal Disetor	**2,509**	Paid-In Capital and Additional Paid-In Capital
Akumulasi Laba/(Rugi)	**1,456**	Accumulated Profit/(Loss)
Komponen Ekuitas Lainnya	**606**	Other Equity Components

Uraian	Proyeksi RBB 2026 RBB Projection 2026	Description
Ringkasan Laba/(Rugi) **Summary of Profit/(Loss)**		
Pendapatan dan Beban Bunga - Bersih	**579**	Interest Income and Expenses - Net
Pendapatan/(Beban) Operasional selain Bunga - Bersih	**(308)**	Operating Income/(Expenses) Other than Interest - Net
Laba/(Rugi) Operasional	**270**	Profit/(Loss) from Operations
Pendapatan/(Beban) Non-Operasional - Bersih	**(47)**	Non-Operating Income/(Expenses) - Net
Laba/(Rugi) Sebelum Beban Pajak Penghasilan	**224**	Profit/(Loss) before Income Tax Expense
Beban Pajak Penghasilan - Bersih	**(48)**	Income Tax Expense - Net
Laba/(Rugi) Setelah Beban Pajak Penghasilan	**175**	Profit/(Loss) Net of Income Tax Expense
Kebijakan Dividen **Dividend Policy**		
Dividen yang Dibagikan	**0**	Distributed Dividends
Struktur Modal **Capital Structure**		
KPMM untuk Risiko Kredit, Risiko Operasional, dan Risiko Pasar (%)	**23.85**	CAR for Credit Risk, Operational Risk, and Market Risk (%)
Total Kantor **Total Offices**		
Kantor Cabang	**14**	Branches
Kantor Cabang Pembantu	**21**	Sub-Branches
Jaringan Kantor Lain (Kantor Kas, *Payment Point*, dan Lainnya)	**2**	Other Office Network (Cash Office, Payment Point, and Others)

Asumsi dalam Menyusun Proyeksi

Dalam menyusun proyeksi keuangan, Bank Victoria mengacu pada kemampuan internal serta mempertimbangkan perkembangan kondisi ekonomi terkini dan prospek ke depan. Proyeksi disesuaikan dengan dinamika ekonomi global, arah kebijakan pemerintah, serta indikator makro dan mikro yang bersumber dari APBN 2026 dan publikasi resmi Bank Indonesia. Asumsi-asumsi tersebut menjadi dasar dalam penyusunan RBB, guna memastikan perencanaan keuangan yang realistis, terukur, dan selaras dengan strategi pertumbuhan berkelanjutan. Adapun asumsi makro dan mikro utama yang digunakan dalam penyusunan RBB Bank Victoria untuk periode 2026-2028 adalah sebagai berikut:

Assumptions in Preparing Projections

In preparing its financial projections, Bank Victoria refers to internal capabilities and considers current economic developments and future prospects. The projections are adjusted to global economic dynamics, government policy directions, and macro and micro indicators sourced from the 2026 State Budget and official Bank Indonesia publications. These assumptions serve as the basis for preparing RBB, ensuring realistic, and measurable financial planning in line with sustainable growth strategies. The main macro and micro assumptions used in preparing Bank Victoria's RBB for the 2026-2028 period are as follows:

Uraian	Proyeksi Projection			Description
	2026	2027	2028	
Asumsi Makro **Macro Assumptions**				
Pertumbuhan PDB	5.00 – 5.20%	5.00 – 5.20%	5.00 – 5.20%	GDP Growth
Inflasi	2.50%	2.80%	3.00%	Inflation
Kurs IDR/USD	16,500	16,800	17,000	IDR/USD Exchange Rate
BI 7 *Days Rate*	5.75 – 6.00%	5.75 – 6.00%	5.75 – 6.00%	BI 7 Days Rate

Uraian	Proyeksi Projection			Description
	2026	2027	2028	
Asumsi Mikro Micro Assumptions				
Pertumbuhan Kredit	9 – 12%	9 – 12%	9 – 12%	Loan Growth
Pertumbuhan Dana Pihak Ketiga	8 – 10%	8 – 10%	8 – 10%	Third-Party Funds Growth
Tingkat Bunga Simpanan Tabungan	3.00 – 7.50%	3.00 – 7.25%	3.00 – 7.00%	Interest Rate on Savings Deposits
Tingkat Bunga Kredit Ritel Komersil	10.00 – 13.50%	10.00 – 13.50%	10.00 – 13.50%	Commercial Retail Loan Interest Rate

Strategi Pengembangan Bisnis ke Depan

Untuk memastikan pencapaian kinerja yang optimal, berkelanjutan, dan mampu merespons dinamika pasar serta kebutuhan nasabah yang terus berkembang, Bank Victoria telah merancang strategi dan rencana pengembangan bisnis yang terintegrasi dan berorientasi jangka panjang. Strategi pengembangan bisnis tersebut sejalan dengan penetapan tema Rencana Bisnis Bank 2026 yaitu ***"Strengthening Digital Transformation for Sustainable Banking Growth"*** yang dijabarkan sebagai berikut:

1. Menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten yang selaras dengan prinsip-prinsip manajemen risiko dan kepatuhan terhadap regulasi (*compliance*);
2. Menjaga dan memelihara permodalan di level yang kuat dan memadai sebagai landasan pengembangan dan pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan;
3. Melanjutkan optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan;
4. Melanjutkan dan meningkatkan inovasi produk dan layanan terbaik yang fokus kepada nasabah (*customer-centric*);
5. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi dan pengembangan produk, serta peningkatan layanan;
6. Mengembangkan kualitas dan meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah untuk menghadapi tantangan bisnis; dan
7. Meningkatkan nilai perusahaan bagi pemegang saham dan pemangku kepentingan.

Future Business Development Strategies

To ensure optimal, sustainable performance and ability to respond to market dynamics and evolving customer needs, Bank Victoria has designed an integrated and long-term business development strategy and plan. This business development strategy is in line with The Bank's 2026 Business Plan, namely **"Strengthening Digital Transformation for Sustainable Banking Growth,"** is outlined as follows:

1. Maintaining and strengthening the consistent application of GCG principles, which are in line with risk management principles and regulatory compliance;
2. Maintaining and fostering capital at a strong and adequate level as a basis for prudent and sustainable development and growth of the Bank's business scale;
3. Continuing optimization through evaluating the performance of branch office network to increase its efficiency and productivity to achieve sustainable business growth;
4. Continuing and improving product innovation and best services that focus on customers (customer-centric);
5. Continuing the development of information technology systems to support efficiency, innovation and product development, as well as service improvements;
6. Developing quality and increasing the productivity of human capital and customer service to face business challenges; and
7. Increasing corporate values for shareholders and stakeholders.

Informasi Material Setelah Tanggal Laporan Akuntan

Tidak terdapat informasi material yang terjadi antara akhir periode pelaporan 31 Desember 2025 hingga tanggal laporan akuntan.

Material Information Subsequent to the Accountant's Reporting Date

There was no material information that occurred between the end of the reporting period, 31 December 2025, and the accountant's reporting date.

Kebijakan Dividen

Bank Victoria menetapkan kebijakan pembagian dividen berdasarkan ketentuan yang tercantum dalam Anggaran Dasar Bank, di mana dividen hanya dapat dibagikan apabila Bank memiliki saldo laba yang positif. Pembagian dividen tersebut harus memperoleh persetujuan RUPS serta tetap mengacu pada ketentuan perundang-undangan yang berlaku. Penetapan dividen juga mempertimbangkan kondisi keuangan, tingkat kesehatan Bank, dan seluruh regulasi yang relevan di sektor perbankan.

Dalam RUPS Tahunan 2024 dan 2025, Bank Victoria memutuskan untuk tidak membagikan dividen kepada Pemegang Saham.

Dividend Policy

Bank Victoria determines dividend distribution policy based on the provisions set out in the Bank's Articles of Association,in which dividends can only be distributed if the Bank has a positive profit balance. The distribution of dividends must obtain GMS approval and still refers to the provisions of applicable laws and regulations. The determination of dividends also considers financial condition, sound rating of the Bank, and all relevant regulations in banking sector.

At the 2024 and 2025 Annual GMS, Bank Victoria decided not to distribute dividends to Shareholders.

Realisasi Penggunaan Dana Hasil Penawaran Umum

Informasi terkait realisasi penggunaan dana hasil penawaran umum Bank Victoria sepanjang tahun 2025 diungkapkan sebagai berikut:

Realization of the Use of Public Offering Proceeds

Information regarding the realization of the use of public offering proceeds of Bank Victoria throughout 2025 is disclosed as follows:

Periode 1 Januari 2025-30 Juni 2025
1 January 2025-30 June 2025 Period

(dalam Rupiah / in Rupiah)

Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Proceeds			Rencana Penggunaan Dana Plan to Use Proceeds		Realisasi Penggunaan Dana Realized Use of Proceeds		Sisa Dana Hasil Penawaran Umum Remaining Amount of Public Offering Proceeds (Rp)
		Total Hasil Penawaran Umum Total Public Offering Proceeds (Rp)	Biaya Penawaran Umum Public Offering Fee (Rp)	Hasil Bersih Net Proceeds (Rp)	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development (Rp)	Total (Rp)	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development (Rp)	Total (Rp)	
Penawaran Umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 Public Offering of Bank Victoria Continuous Subordinated Bonds III Phase II Year 2025	18 Juni 2025 18 June 2025	500,000,000,000	6,447,987,841	493,551,012,159	493,551,012,159	493,551,012,159	493,551,012,159	493,551,012,159	-
Pelaksanaan Waran Seri VII Execution of Series VII Warrants	5 Desember 2022 5 December 2022	256,667,501,600	-	256,667,501,600	256,667,501,600	256,667,501,600	256,667,501,600	256,667,501,600	-
Total		**756,667,501,600**	**6,447,987,841**	**750,218,513,759**	**750,218,513,759**	**750,219,513,759**	**750,219,513,759**	**750,219,513,759**	**-**

Periode 1 Juli 2025-31 Desember 2025
1 July-31 December 2025 Period

(dalam Rupiah / in Rupiah)

Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Proceeds			Rencana Penggunaan Dana Plan to Use Proceeds		Realisasi Penggunaan Dana Realized Use of Proceeds		Sisa Dana Hasil Penawaran Umum Remaining Amount of Public Offering Proceeds (Rp)
		Total Hasil Penawaran Umum Total Public Offering Proceeds (Rp)	Biaya Penawaran Umum Public Offering Fee (Rp)	Hasil Bersih Net Proceeds (Rp)	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development (Rp)	Total (Rp)	Modal Kerja dalam Rangka Pengembangan Usaha Working Capital in Business Development (Rp)	Total (Rp)	
Penawaran Umum Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 The Public Offering of Bank Victoria Continuing Bonds IV Phase I Year 2025	4 Juli 2025 4 July 2025	750,000,000,000	10,831,369,947	739,168,630,053	739,168,630,053	739,168,630,053	739,168,630,053	739,168,630,053	-
Penawaran Umum Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 The Public Offering of Bank Victoria Continuing Bonds IV Phase II Year 2025	26 September 2025	750,000,000,000	9,564,942,211	740,435,057,789	740,435,057,789	740,435,057,789	740,435,057,789	740,435,057,789	-
Pelaksanaan Waran Seri VII Execution of Series VII Warrants	5 Desember 2022 5 December 2022	421,090,600	-	421,090,600	421,090,600	421,090,600	421,090,600	421,090,600	-
Total		**1,500,421,090,600**	**20,396,312,158**	**1,480,024,778,442**	**1,480,024,778,442**	**1,480,024,778,442**	**1,480,024,778,442**	**1,480,024,778,442**	**-**

Informasi Material Investasi, Ekspansi, Divestasi, Penggabungan/Peleburan Usaha, Akuisisi, dan Restrukturisasi Utang/Modal

Investasi

Pada periode 2025, Bank Victoria melakukan investasi dalam instrumen efek-efek sebagai bagian dari strategi pengelolaan portofolio dan optimalisasi pendapatan non-operasional. Rincian atas investasi dalam efek-efek tersebut disajikan pada tabel berikut:

Material Information on Investment, Expansion, Divestment, Business Merger/ Consolidation, Acquisition, and Debt/ Capital Restructuring

Investments

In the 2025 period, Bank Victoria invested in securities as part of portfolio management strategy and non-operating income optimization. Details of these investments in securities are presented in the following table:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	Description
Nilai Wajar Melalui Laba Rugi **Fair Value Through Profit or Loss**			
Obligasi Pemerintah	-	146,629	Government Bonds
Subtotal	**-**	**146,629**	**Subtotal**

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	Description
Nilai Wajar melalui Penghasilan Komprehensif Lain **Fair Value through Other Comprehensive Income**			
Surat Utang Negara	**1,951,512**	1,117,504	Government Promissory Notes
Reksadana	**2,164,881**	836,818	Mutual Funds
Surat Berharga Syariah Negara	**270,212**	287,857	Government Sharia Bonds
Obligasi Korporasi	**141,933**	204,964	Corporate Bonds
Wesel Jangka Menengah	**274,921**	203,190	Medium-Term Notes
Efek Beragun Aset	**262**	1,002	Asset-Backed Securities
Sekuritas Rupiah Bank Indonesia (SRBI)	**79,915**		Bank Indonesia Rupiah Securities (SRBI)
Surat Berharga Syariah Korporasi	**91,553**	-	Corporate Sharia Bonds
Subtotal	**4,975,189**	**2,651,335**	**Subtotal**
Biaya Perolehan Diamortisasi **Amortised Cost**			
Surat Utang Negara	**4,074,411**	3,239,743	Government Promissory Notes
Sekuritas Rupiah Bank Indonesia (SRBI)	**196,672**	760,505	Bank Indonesia Rupiah Securities (SRBI)
Obligasi Korporasi	**448,890**	571,465	Corporate Bonds
Reksadana	**358,552**	75,952	Mutual Funds
Surat Berharga Syariah Korporasi	**20,000**	16,972	Corporate Sharia Bonds
Surat Berharga Syariah Negara	**1,898**	1,388	Government Sharia Bonds
Wesel Jangka Menengah	**-**	-	Medium-Term Notes
Subtotal	**5,100,423**	**4,666,025**	**Subtotal**
Total	**10,075,612**	**7,463,989**	**Total**
Dikurangi			**Less**
Cadangan Kerugian Penurunan Nilai	**(1,153)**	(1,266)	Allowance for Impairment Losses
Total	**10,074,459**	**7,462,723**	**Total**

Restrukturisasi Utang dan/atau Restrukturisasi Modal

Sepanjang tahun 2025, Bank Victoria melaksanakan restrukturisasi utang sebagai bagian dari upaya pengelolaan kewajiban keuangan secara lebih efisien dan berkelanjutan. Rincian atas transaksi restrukturisasi utang yang dilakukan selama periode pelaporan disajikan dalam tabel berikut:

Debt Restructuring and/or Capital Restructuring

Throughout 2025, Bank Victoria implemented debt restructuring as an effort to manage its financial obligations in a more efficient and sustainable manner. Details of the debt restructuring transactions conducted during the reporting period are presented in the following table:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	Description
Penjadwalan Kembali Angsuran dan Perpanjangan Jangka Waktu Pinjaman	**1,874,533**	2,206,450	Rescheduling of Installments and the Extention of Credit Period
Dikurangi: Cadangan Kerugian Penurunan Nilai	**(434,914)**	(342,681)	Less: Allowance for Impairment Losses
Total	**1,439,619**	**1,863,769**	**Total**

Ekspansi, Divestasi, Penggabungan/ Peleburan Usaha, dan Akuisisi

Selain melakukan kegiatan investasi dan restrukturisasi utang, Bank Victoria tidak melakukan kegiatan lain, seperti ekspansi, divestasi, penggabungan/peleburan usaha, maupun akuisisi pada periode 2025.

Expansion, Divestment, Businesses Merger/ Consolidation, and Acquisition

In addition to carrying out investment and debt restructuring activities, Bank Victoria did not carry out other activities, such as expansion, divestment, merger/consolidation of businesses, or acquisitions in the 2025 period.

Informasi Transaksi Material yang Mengandung Benturan Kepentingan

Pada tahun 2025, Bank Victoria tidak mencatatkan transaksi material yang mengandung benturan kepentingan. Sehingga, informasi terkait nama pihak dan sifat hubungan afiliasi, penjelasan mengenai kewajaran transaksi, alasan dilakukannya transaksi, realisasi nilai transaksi, kebijakan perusahaan terkait dengan mekanisme *review* atas transaksi, serta pemenuhan peraturan dan ketentuan terkait tidak dapat disajikan dalam Laporan Tahunan ini.

Information on Material Transactions with Conflict of Interest

In 2025, Bank Victoria did not record any material transactions containing conflicts of interest. Therefore, there is no information on the names of parties and nature of their affiliated relationships, explanations on fairness of transactions, reasons for the transactions, realized transaction value, the company's policy on transaction review mechanism, and compliance with related regulations and provisions that can be presented in this Annual Report.

Informasi Transaksi dengan Pihak Afiliasi

Pada tahun 2025, Bank Victoria melakukan sejumlah transaksi dengan pihak afiliasi sebagai bagian dari kegiatan usaha yang wajar dan berkelanjutan. Transaksi tersebut dilaksanakan dalam rangka mendukung operasional Bank serta menghasilkan pendapatan usaha secara langsung maupun tidak langsung. Seluruh transaksi afiliasi dijalankan secara rutin dan berulang, serta dilandasi oleh prinsip kewajaran dan kesetaraan, tanpa adanya perlakuan istimewa. Rincian atas transaksi afiliasi yang dilakukan selama tahun 2025 disajikan dalam tabel berikut:

Information of Transaction with Affiliated Parties

In 2025, Bank Victoria made a number of transactions with affiliated parties as part of its normal and sustainable business activities. These transactions were conducted to support the Bank's operations and generate direct and indirect business revenue. All affiliated transactions were conducted routinely and repeatedly, and were based on the principles of fairness and equality, without any preferential treatment. Details of transactions with affiliation conducted throughout 2025 are presented in the following table:

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
2 Februari 2025	PT Victoria Insurance	- PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 84,93%. - PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 60,17%.	Asuransi *Cash in Save*	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	224,124,892
2 February 2025		- PT Victoria Investama Tbk owns 84.93% shares of PT Victoria Insurance Tbk. - PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 60.17%.	Cash in Save Insurance	Increasing synergy and cross-selling within Victoria Group	
13 Februari 2025	PT Victoria Insurance	- PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 84,93%. - PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 60,17%.	Bank Victoria Kantor Cabang Surabaya	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	71,992,800
13 February 2025		- PT Victoria Investama Tbk owns 84.93% shares of PT Victoria Insurance Tbk. - PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 60.17%.	Bank Victoria Surabaya Branch	Increasing synergy and cross-selling within Victoria Group	

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
1 Maret 2025 1 March 2025	PT Victoria Insurance	- PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 84,93%. - PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 60,17%. - PT Victoria Investama Tbk owns 84.93% shares of PT Victoria Insurance Tbk. - PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 60.17%.	Asuransi *Property* Property Insurance	Meningkatkan sinergi dan *cross selling* antar Grup Victoria Increasing synergy and cross-selling within Victoria Group	90,542,242
26 Mei 2025 26 May 2025	PT Emperor Finance Indonesia	- PT Emperor Finance Indonesia dimiliki sahamnya oleh PT Dwimagna Kapital Indonesia Tbk sebesar 99,00%. - PT Dwimagna Kapital Indonesia dimiliki sahamnya oleh Debora Wahjutirto Tanoyo yang merupakan Direktur Bank Victoria. sebesar 24,50%. - PT Dwimagna Kapital Indonesia Tbk owns 99.00% shares of PT Emperor Finance Indonesia. - Debora Wahjutirto Tanoyo, the Director of Bank Victoria, owns 24.50% shares of PT Dwimagna Kapital Indonesia.	Bank Victoria Kantor Cabang Manado Bank Victoria Manado Branch Office	Meningkatkan sinergi dan *cross selling* antar Grup Victoria Increasing synergy and cross-selling within Victoria Group	656,500,000
25 Juni 2025 25 June 2025	PT Sunset Studio One	- PT Sunset Studio One dimiliki sahamnya oleh PT Studio One sebesar 99,99%. - PT Studio One dimiliki sahamnya oleh PT Tri Daya Investindo sebesar 99,99%. - PT Tri Daya Investindo dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%. - PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%. - Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100%. - Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li yang merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali Bank Victoria) sebesar 63,11%. - PT Studio One owns 99.99% shares of PT Sunset Studio One. - PT Tri Daya Investindo owns 99.99% shares of PT Studio One. - PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Tri Daya Investindo. - Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk. - Chemical Asia Corporation Pte Ltd owns 100% shares of Safire Capital Ltd. - Louise Li, a son of Suzanna Tanojo (Controlling Shareholder of Bank Victoria), owns 63.11% shares of Chemical Asia Corporation Pte Ltd.	Bank Victoria Kantor Fungsional Bali Bank Victoria Bali Functional Office	Meningkatkan sinergi dan *cross selling* antar Grup Victoria Increasing synergy and cross-selling within Victoria Group	218,160,000

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
22 Agustus 2025	PT Boga Inti Cita Rasa	- PT Boga Inti Cita Rasa dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,92%. - PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%. - Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100%. - Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li yang merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali Bank Victoria) sebesar 63,11%.	Kerjasama Bipartit	Memperluas target *market* Bank Victoria, meningkatkan *value brand* melalui kolaborasi dengan brand lain dan meningkatkan akuisisi	Tidak ada
22 August 2025		- PT Bhuwanatala Indah Permai Tbk owns 99.92% shares of PT Boga Inti Cita Rasa. - Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk. - Chemical Asia Corporation Pte Ltd owns 100% shares of Safire Capital Ltd. - Louise Li, a son of Suzanna Tanojo (Controlling Shareholder of Bank Victoria), owns 63.11% shares of Chemical Asia Corporation Pte Ltd.	Bipartite Cooperation	Expanding Bank Victoria's target market, increasing brand value through collaboration with other brands, and increasing acquisitions	None
1 September 2025	PT Victoria Insurance	- PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 84,93%. - PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 60,17%.	Asuransi *Cash in Transit*	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	Maksimal per Tahun 211.200.000
1 September 2025		- PT Victoria Investama Tbk owns 84.93% shares of PT Victoria Insurance Tbk. - PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 60.17%.	Cash in Transit Insurance	Increasing synergy and cross-selling within Victoria Group	Maximum per Year: 211,200,000
1 September 2025	PT Victoria Insurance	- PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 84,93%. - PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 60,17%.	Asuransi *Property*	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	137,769,824
1 September 2025		- PT Victoria Investama Tbk owns 84.93% shares of PT Victoria Insurance Tbk. - PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 60.17%.	Property Insurance	Increasing synergy and cross-selling within Victoria Group	
1 Desember 2025	PT Victoria Insurance	- PT Victoria Insurance Tbk dimiliki sahamnya oleh PT Victoria Investama Tbk sebesar 84,93%. - PT Victoria Investama Tbk merupakan Pemegang Saham Pengendali Bank Victoria yang memiliki saham sebesar 60,17%.	Asuransi Kendaraan	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	73,941,916

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
1 December 2025		- PT Victoria Investama Tbk owns 84.93% shares of PT Victoria Insurance Tbk. - PT Victoria Investama Tbk is a Controlling Shareholder of Bank Victoria with shares of 60.17%.	Vehicle Insurance	Increasing synergy and cross-selling within Victoria Group	
19 Desember 2025	PT Asri Kencana Gemilang	- PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%. - PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%. - Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100%. - Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li yang merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali Bank Victoria) sebesar 63,11%.	Gedung Graha BIP Kantor Cabang	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	1,661,004,000
19 December 2025		- PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang. - Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk. - Chemical Asia Corporation Pte Ltd owns 100% shares of Safire Capital Ltd. - Louise Li, a son of Suzanna Tanojo (Controlling Shareholder of Bank Victoria), owns 63.11% shares of Chemical Asia Corporation Pte Ltd.	Graha BIP Building Branch Office	Increasing synergy and cross-selling within Victoria Group	
19 Desember 2025	PT Asri Kencana Gemilang	- PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%. - PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%. - Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100%. - Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li yang merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali Bank Victoria) sebesar 63,11%.	Gedung Graha BIP Lt. 9	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	873,126,000
19 December 2025		- PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang. - Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk. - Chemical Asia Corporation Pte Ltd owns 100% shares of Safire Capital Ltd. - Louise Li, a son of Suzanna Tanojo (Controlling Shareholder of Bank Victoria), owns 63.11% shares of Chemical Asia Corporation Pte Ltd.	Graha BIP Building, 9th Floor	Increasing synergy and cross-selling within Victoria Group	

Tanggal Date	Nama Pihak Name of Parties	Sifat Hubungan Afiliasi Nature of Affiliation Relationship	Objek Transaksi Objects of Transaction	Alasan Dilakukannya Transaksi Reasons for Conducting Transactions	Nilai Transaksi Transaction Value (Rp)
19 Desember 2025	PT Asri Kencana Gemilang	- PT Asri Kencana Gemilang dimiliki sahamnya oleh PT Bhuwanatala Indah Permai Tbk sebesar 99,99%. - PT Bhuwanatala Indah Permai Tbk dimiliki sahamnya oleh Safire Capital Ltd sebesar 66,52%. - Safire Capital Ltd dimiliki sahamnya oleh Chemical Asia Corporation Pte Ltd sebesar 100%. - Chemical Asia Corporation Pte Ltd dimiliki sahamnya oleh Louise Li yang merupakan anak dari Suzanna Tanojo (Pemegang Saham Pengendali Bank Victoria) sebesar 63,11%.	Gedung Graha BIP Lt. 3	Meningkatkan sinergi dan *cross selling* antar Grup Victoria	2,923,074,000
19 December 2025		- PT Bhuwanatala Indah Permai Tbk owns 99.99% shares of PT Asri Kencana Gemilang. - Safire Capital Ltd owns 66.52% shares of PT Bhuwanatala Indah Permai Tbk. - Chemical Asia Corporation Pte Ltd owns 100% shares of Safire Capital Ltd. - Louise Li, a son of Suzanna Tanojo (Controlling Shareholder of Bank Victoria), owns 63.11% shares of Chemical Asia Corporation Pte Ltd.	Graha BIP Building 3rd Floor	Increasing synergy and cross-selling within Victoria Group	

Transaksi dengan Pihak-Pihak Afiliasi dan Kewajaran Transaksi

Seluruh transaksi yang melibatkan pihak berelasi telah dilakukan dengan pengawasan dari Dewan Komisaris dan Komite Audit, serta sesuai dengan peraturan dan ketentuan yang berlaku. Transaksi ini tidak memiliki tujuan khusus yang berpotensi melanggar ketentuan.

Pemenuhan Peraturan dan Ketentuan Terkait

Bank Victoria telah memenuhi ketentuan berikut:

1. Peraturan Otoritas Jasa Keuangan No. 17/POJK.04/2020 tentang Transaksi Material dan Perubahan Kegiatan Usaha.
2. Peraturan Otoritas Jasa Keuangan No. 42/POJK.04/2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan.

Pernyataan Dewan Komisaris, Direksi, dan Komite Audit

Direksi menegaskan bahwa transaksi dengan pihak afiliasi telah dilakukan sesuai dengan prosedur yang memadai guna memastikan kepatuhan terhadap praktik bisnis yang berlaku umum, termasuk penerapan prinsip transaksi yang wajar (*arm's length principle*). Selain itu, Dewan Komisaris dan Komite Audit juga memastikan bahwa transaksi tersebut telah memenuhi standar bisnis yang berlaku serta berpedoman pada prinsip transaksi yang wajar.

Transactions with Affiliated Parties and Fairness of Transactions

All transactions involving related parties are conducted under the supervision of the Board of Commissioners and Audit Committee, and in accordance with applicable laws and regulations. These transactions have no specific purpose that may potentially violate regulations.

Fulfillment of Related Regulations and Provisions

Bank Victoria has complied with the following provisions:

1. Financial Services Authority Regulation No. 17/POJK.04/2020 on Material Transaction and Changes of Business Activities.
2. Financial Services Authority Regulation No. 42/POJK.04/2020 on Affiliated Transactions and Conflict of Interest Transactions.

Statement of the Board of Commissioners, Board of Directors, and Audit Committee

The Board of Directors confirmed that transactions with affiliated parties were conducted in accordance with adequate procedures to ensure compliance with generally accepted business practices, including the application of the arm's length principle. Furthermore, the Board of Commissioners and the Audit Committee also ensured that these transactions complied with applicable business standards and were guided by the arm's length principle.

Transaksi dengan Pihak Berelasi

Dalam menjalankan operasional bisnisnya, Bank Victoria senantiasa menjunjung tinggi prinsip transparansi termasuk dalam menjalankan transaksi dengan pihak-pihak berelasi. Seluruh transaksi yang dilakukan dengan pihak berelasi dilaksanakan dalam rangka kegiatan usaha normal dan didasarkan pada prinsip kewajaran serta kesetaraan, tanpa adanya perlakuan istimewa yang dapat menimbulkan benturan kepentingan. Informasi lebih lanjut mengenai jenis, nilai, dan pihak-pihak yang terlibat dalam transaksi pihak berelasi disajikan secara rinci dalam Catatan No. 42 tentang Informasi Mengenai Pihak-Pihak Berelasi yang terdapat pada halaman 125 dalam Laporan Keuangan Konsolidasian Bank Victoria.

Transactions with Related Parties

In conducting business operations, Bank Victoria consistently upholds the principle of transparency, including in conducting transactions with related parties. All transactions with related parties are conducted in the normal course of business and are based on the principles of fairness and equality, without any preferential treatment that could give rise to a conflict of interest. Further information on the types, values, and parties involved in related party transactions is presented in detail in Note No. 42 on Information Regarding Related Parties, stated on page 125 in Bank Victoria's Consolidated Financial Statements.

Komitmen dan Kontinjensi

Bank Victoria menyajikan informasi mengenai komitmen dan kontinjensi yang dimiliki per 31 Desember 2025 dan 2024. Pengungkapan ini bertujuan untuk memberikan gambaran yang komprehensif atas kewajiban potensial yang mungkin timbul di masa mendatang dan dampaknya terhadap posisi keuangan Bank. Rincian informasi terkait komitmen dan kontinjensi disajikan dalam tabel berikut:

Commitments and Contingencies

Bank Victoria presents information regarding its commitments and contingencies as of 31 December 2025 and 2024. This disclosure aims to provide a comprehensive overview of potential liabilities that may arise in the future and their impact on the Bank's financial position. Details of information regarding commitments and contingencies are presented in the following table:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	Description
Komitmen **Commitments**			
Liabilitas Komitmen			**Commitment Liabilities**
Fasilitas Pinjaman yang Belum Digunakan			Unused Loans Facilities
Pihak Berelasi	**(11,125)**	(3,600)	Related Parties
Pihak Ketiga	**(6,811,508)**	(4,657,964)	Third Parties
Liabilitas Komitmen - Bersih	**(6,822,633)**	**(4,661,564)**	**Commitment Liabilities - Net**
Kontinjensi **Contingencies**			
Tagihan Kontinjensi			**Contingent Receivables**
Pendapatan Bunga atas Pinjaman Bermasalah - Pihak Ketiga	**211,799**	263,555	Interest Receivables on Non-Performing Loans - Third Parties
Liabilitas Kontinjensi			**Contingent Liabilities**
Garansi yang Diterbitkan – Pihak Berelasi	**-**	(271)	Guarantees Issued – Related Parties
Garansi yang Diterbitkan – Pihak Ketiga	**(179,024)**	(521,872)	Guarantees Issued – Third Parties
Letter of Credit	**(11,625)**	(169,275)	Letter of Credit
Kontinjensi - Bersih	**22,150**	**(427,864)**	**Contingencies - Net**
Total Liabilitas Komitmen dan Kontinjensi - Bersih	**(6,800,483)**	**(5,089,427)**	**Total Commitment and Contingencies Liabilities - Net**

Larangan, Batasan, dan/atau Hambatan Signifikan untuk Melakukan Transfer Dana antara Bank dan Entitas Lain dalam Satu Kelompok Usaha

Bank Victoria tidak memiliki larangan/batasan dalam prosedur operasional terkait transfer dana nasabah, baik dalam bentuk transfer masuk maupun transfer keluar antara Bank dan entitas lain dalam 1 (satu) kelompok usaha. Dalam menyalurkan pinjaman ke pihak ketiga dan entitas lainnya dalam 1 (satu) kelompok usaha, Bank Victoria mengacu pada BMPK yang telah dibuat oleh Divisi *Accounting* dan dipantau oleh Divisi *Compliance, System Procedure & Coordinator Customer Protection* dan *Divisi Credit Risk Review*.

Prohibitions, Restrictions, and/or Significant Barriers to Transfer Funds between the Bank and Other Entities in One Business Group

Bank Victoria has no restrictions/limitations in operational procedures regarding Customer's fund transfer either incoming and outgoing transfers between the Bank and other entities within 1 (one) business group. In providing loans to third parties and other entities within 1 (one) business group, Bank Victoria refers to LLL formulated by the Accounting System Procedure & Customer Protection Division, and the activity is monitored by the Compliance, System Procedure & Coordinator Customer Protection Division and Credit Risk Review Division.

Perubahan Peraturan Perundang-Undangan yang Berpengaruh Signifikan terhadap Kinerja Bank

Bank berkomitmen untuk mematuhi segala peraturan perundang-undangan yang berlaku. Oleh karena itu, Bank Victoria selalu memperhatikan setiap perubahan dalam peraturan perundang-undangan yang dapat diimplementasikan dalam kegiatan usahanya. Perubahan beberapa peraturan perundang-undangan sepanjang tahun 2025 dan penyesuaian yang dilakukan Bank Victoria diuraikan dalam tabel berikut:

Amendments to Laws and Regulations with Significant Impacts on the Bank's Performance

The Bank is committed to complying with all applicable laws and regulations. Therefore, Bank Victoria always pays attention to any changes in laws and regulations that may be implemented in its business activities. Changes to several laws and regulations throughout 2025 and adjustments made by Bank Victoria are outlined in the following table:

Peraturan **Regulation**	**Penyesuaian yang Dilakukan** **Adjustment Made**	**Dampak terhadap Laporan Keuangan** **Impact on Financial Statements**
Peraturan Anggota Dewan Gubernur No. 19 Tahun 2024 Perubahan Keenam atas Peraturan Anggota Dewan Gubernur No. 21/25/PADG/2019 tentang Rasio *Loan to Value* **untuk Kredit Properti, Rasio** *Financing to Value* **untuk Pembiayaan Properti, dan Uang Muka untuk Kredit atau Pembiayaan Kendaraan Bermotor**	Surat Keputusan Direksi No. 005/SK-DIR/12/25 tanggal 11 Desember 2025 tentang SOPP *Business Linkage*, Surat Keputusan Direksi No. 024/SK-DIR/09/25 tanggal 30 September 2025 tentang SOPP *Consumer Banking*, dan Surat Keputusan Direksi No. 006/SK-DIR/12/25 tanggal 11 Desember 2025 tentang SOPP *Commercial Banking* & SME	Tidak berdampak signifikan terhadap Laporan Keuangan Bank
Regulation of Members of the Board of Governors No. 19 of 2024, Sixth Amendment to the Regulation of Members of the Board of Governors No. 21/25/PADG/2019 on Loan to Value Ratio for Property Loans, Financing to Value Ratio for Property Financing, and Advances for Motor Vehicle Loans or Financing	Board of Directors' Decision Letter No. 005/SK-DIR/12/25 dated 11 December 2025 on SOPP for Business Linkage; Board of Directors' Decision Letter No. 024/SK-DIR/09/25 dated 30 September 2025 on SOPP for Consumer Banking; and Board of Directors' Decision Letter No. 006/SK-DIR/12/25 dated 11 December 2025 on SOPP for Commercial Banking & SME	Has no significant impact on the Bank's Financial Statements

Peraturan Regulation	Penyesuaian yang Dilakukan Adjustment Made	Dampak terhadap Laporan Keuangan Impact on Financial Statements
Peraturan Anggota Dewan Gubernur No. 21 Tahun 2024 Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial (Peraturan Anggota Dewan Gubernur Perubahan Kedua Kebijakan Insentif Likuiditas Makroprudensial) Regulation of Members of the Board of Governors No. 21 of 2024, Second Amendment to the Regulation of Members of the Board of Governors No. 11 of 2023 on Regulations for Implementing Macroprudential Liquidity Incentive Policy (Regulation of Members of the Board of Governors, Second Amendment to the Macroprudential Liquidity Incentive Policy)	Sosialisasi Peraturan Anggota Dewan Gubernur No. 21 Tahun 2024 Perubahan Kedua atas Peraturan Anggota Dewan Gubernur No. 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial (Peraturan Anggota Dewan Gubernur Perubahan Kedua Kebijakan Insentif Likuiditas Makroprudensial) Dissemination on the Regulation of Members of the Board of Governors No. 21 of 2024, Second Amendment to the Regulation of Members of the Board of Governors No. 11 of 2023 on Regulations for Implementing Macroprudential Liquidity Incentive Policy (Regulation of Members of the Board of Governors, Second Amendment to the Macroprudential Liquidity Incentive Policy)	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Anggota Dewan Gubernur No. 24 Tahun 2024 tentang Keamanan Sistem Informasi dan Ketahanan Siber bagi Penyelenggara Sistem Pembayaran, Pelaku Pasar Uang dan Pasar Valuta Asing, serta Pihak Lain yang Diatur dan Diawasi Bank Indonesia Regulation of Members of the Board of Governors No. 24 of 2024 on Information System Security and Cyber Resilience for Payment System Operators, Money Market and Foreign Exchange Market Players, and Other Parties Regulated and Supervised by Bank Indonesia	Surat Keputusan Direksi No. 019/SK-DIR/07/25 tanggal 30 Juli 2025 tentang SOP Ketahanan dan Keamanan Siber Board of Directors' Decision Letter No. 019/SK-DIR/07/25 dated 30 July 2025 on SOPs for Cyber Resilience and Security	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Anggota Dewan Gubernur No. 1 Tahun 2025 Perubahan atas Peraturan Anggota Dewan Gubernur No. 17 Tahun 2023 tentang Penyelenggaraan Bank Indonesia-*Fast Payment* **Regulation of Members of the Board of Governors No. 1 of 2025, Amendment to the Regulation of Members of the Board of Governors No. 17 of 2023 on Implementation of Bank Indonesia-Fast Payment**	Surat Keputusan Direksi No. 008/SK-DIR/08/25 tanggal 14 Agustus 2025 tentang SOP Bank Indonesia - *Fast Payment* (BI-Fast) Board of Directors' Decision Letter No. 008/SK-DIR/08/25 dated 14 August 2025 on Bank Indonesia SOPs for Fast Payment (BI-Fast)	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Anggota Dewan Gubernur No. 3 Tahun 2025 Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 21/18/PADG/2019 tentang Implementasi Standar Nasional *Quick Response Code* untuk Pembayaran Regulation of Members of the Board of Governors No. 3 of 2025, Third Amendment to the Regulation of Members of the Board of Governors No. 21/18/PADG/2019 on Implementation of the National Standard Quick Response Code for Payments	Surat Keputusan Direksi No. 009/SK-DIR/01/26 tanggal 8 Januari 2026 tentang SOP Layanan Digital Perbankan Board of Directors' Decision Letter No. 009/SK-DIR/01/26 dated 8 January 2026 on SOPs for Digital Banking Services	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Anggota Dewan Gubernur No. 7 Tahun 2025 Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial Regulation of Members of the Board of Governors No. 7 of 2025, Third Amendment to the Regulation of Members of the Board of Governors No. 11 of 2023 on Implementation of Regulations for Macroprudential Liquidity Incentive Policy	Sosialisasi Peraturan Anggota Dewan Gubernur No. 7 Tahun 2025 Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial Dissemination on the Regulation of Members of the Board of Governors No. 7 of 2025, Third Amendment to the Regulation of Members of the Board of Governors No. 11 of 2023 on Implementation of Regulations for Macroprudential Liquidity Incentive Policy	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Anggota Dewan Gubernur No. 8 Tahun 2025 Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 24/8/PADG/2022 tentang Peraturan Pelaksanaan Pemenuhan GWM dalam Rupiah dan Valuta Asing Regulation of Members of the Board of Governors No. 8 of 2025, Third Amendment to the Regulation of Members of the Board of Governors No. 24/8/PADG/2022 on Regulations for Implementing GWM in Rupiah and Foreign Currency	Sosialisasi Peraturan Anggota Dewan Gubernur No. 8 Tahun 2025 Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur No. 24/8/PADG/2022 tentang Peraturan Pelaksanaan Pemenuhan GWM dalam Rupiah dan Valuta Asing Dissemination on the Regulation of Members of the Board of Governors No. 8 of 2025, Third Amendment to the Regulation of Members of the Board of Governors No. 24/8/PADG/2022 on Regulations for Implementing GWM in Rupiah and Foreign Currency	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements

Peraturan Regulation	Penyesuaian yang Dilakukan Adjustment Made	Dampak terhadap Laporan Keuangan Impact on Financial Statements
Peraturan Anggota Dewan Gubernur No. 10 Tahun 2025 tentang Peraturan Pelaksanaan Rekening Giro di Bank Indonesia Regulation of Members of the Board of Governors No. 10 of 2025 on Regulations for Implementing Current Accounts at Bank Indonesia	Sosialisasi Peraturan Anggota Dewan Gubernur No. 10 Tahun 2025 tentang Peraturan Pelaksanaan Rekening Giro di Bank Indonesia Dissemination on the Regulation of Members of the Board of Governors No. 10 of 2025 on Regulations for Implementing Current Accounts at Bank Indonesia	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Anggota Dewan Gubernur No. 11 Tahun 2025 Perubahan Kedelapan Peraturan Anggota Dewan Gubernur tentang Rasio Intermediasi Makroprudensial (RIM) dan Penyangga Likuiditas Makroprudensial Bagi Bank Regulation of Members of the Board of Governors No. 11 of 2025, Eighth Amendment to the Regulation of Members of the Board of Governors on Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer for Banks	Sosialisasi Peraturan Anggota Dewan Gubernur No. 11 Tahun 2025 Perubahan Kedelapan Peraturan Anggota Dewan Gubernur tentang Rasio Intermediasi Makroprudensial (RIM) dan Penyangga Likuiditas Makroprudensial Bagi Bank Dissemination on the Regulation of Members of the Board of Governors No. 11 of 2025, Eighth Amendment to the Regulation of Members of the Board of Governors on Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer for Banks	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 26 Tahun 2024 tentang Perluasan Kegiatan Usaha Perbankan Financial Services Authority Regulation No. 26 of 2024 on Expansion of Banking Business Activities	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 26 Tahun 2024 tentang Perluasan Kegiatan Usaha Perbankan Dissemination of Financial Services Authority Regulation No. 26 of 2024 on Expansion of Banking Business Activities	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 28 Tahun 2024 tentang Pengelolaan Informasi Rekam Jejak Pelaku Melalui Sistem Informasi Pelaku di Sektor Jasa Keuangan Financial Services Authority Regulation No. 28 of 2024 on Management of Information on the Track Records of Actors through the Actor Information System in Financial Services Sector	Surat Keputusan Direksi No. 003/SK-DIR/05/25 tanggal 9 Mei 2025 tentang Kebijakan Sistem Informasi Pelaku dan Surat Keputusan Direksi No. 004/SK-DIR/05/25 tentang SOP Sistem Informasi Pelaku Board of Directors' Decision Letter No. 003/SK-DIR/05/25 dated 9 May 2025 on the Actor Information System Policy and Board of Directors' Decision Letter No. 004/SK-DIR/05/25 on SOPs for the Actor Information System	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 30 Tahun 2024 tentang Konglomerasi Keuangan dan Perusahaan Induk Konglomerasi Keuangan (PIKK) Financial Services Authority Regulation No. 30 of 2024 on Financial Conglomerates and Financial Holding Companies (PIKK)	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 30 Tahun 2024 tentang Konglomerasi Keuangan dan Perusahaan Induk Konglomerasi Keuangan (PIKK) Dissemination of Financial Services Authority Regulation No. 30 of 2024 on Financial Conglomerates and Financial Holding Companies (PIKK)	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 31 Tahun 2024 tentang Perintah Tertulis Financial Services Authority Regulation No. 31 of 2024 on Written Orders	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 31 Tahun 2024 tentang Perintah Tertulis Dissemination of Financial Services Authority Regulation No. 31 of 2024 on Written Orders	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 44 tahun 2024 tentang Rahasia Bank Financial Services Authority Regulation No. 44 of 2024 on Bank Secrecy	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 44 tahun 2024 tentang Rahasia Bank Dissemination of Financial Services Authority Regulation No. 44 of 2024 on Bank Secrecy	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 1 Tahun 2025 tentang Derivatif Keuangan dengan Aset yang Mendasari Berupa Efek Financial Services Authority Regulation No. 1 of 2025 on Financial Derivatives with Underlying Assets in the Form of Securities	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 1 Tahun 2025 tentang Derivatif Keuangan dengan Aset yang Mendasari Berupa Efek Dissemination of Financial Services Authority Regulation No. 1 of 2025 on Financial Derivatives with Underlying Assets in the Form of Securities	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements

Peraturan Regulation	Penyesuaian yang Dilakukan Adjustment Made	Dampak terhadap Laporan Keuangan Impact on Financial Statements
Peraturan Otoritas Jasa Keuangan No. 2 Tahun 2025 tentang Tata Cara Pelaksanaan Pungutan di Sektor Jasa Keuangan dan Penerimaan Lainnya Financial Services Authority Regulation No. 2 of 2025 on Procedures for Implementing Levies in Financial Services Sector and Other Revenue	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 2 Tahun 2025 tentang Tata Cara Pelaksanaan Pungutan di Sektor Jasa Keuangan dan Penerimaan Lainnya Dissemination of Financial Services Authority Regulation No. 2 of 2025 on Procedures for Implementing Levies in Financial Services Sector and Other Revenue	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 6 Tahun 2025 tentang Laporan Agen Penjual Efek Reksa Dana Financial Services Authority Regulation No. 6 of 2025 on Reports by Mutual Fund Selling Agents	Surat Keputusan Direksi No. 010/SK-DIR/01/25 tanggal 14 Januari 2025 tentang Kebijakan Agen Penula Efek Reksa Dana dan Wakil Agen Penjual Efek Reksa Dana Board of Directors' Decision Letter No. 010/SK-DIR/01/25 dated 14 January 2025 on Policies for Mutual Fund Selling Agents and Representatives of Mutual Fund Selling Agents	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Surat Edaran Otoritas Jasa Keuangan No. 5/SEOJK.04/2025 tentang Pedoman Pelaporan Agen Penjual Efek Reksa Dana dan Bank Umum Sebagai Kustodian Financial Services Authority Circular No. 5/SEOJK.04/2025 on Guidelines for Reporting by Mutual Fund Selling Agents and Commercial Banks as Custodian	Surat Keputusan Direksi No. 010/SK-DIR/01/25 tanggal 14 Januari 2025 tentang Kebijakan Agen Penula Efek Reksa Dana dan Wakil Agen Penjual Efek Reksa Dana Board of Directors' Decision Letter No. 010/SK-DIR/01/25 dated 14 January 2025 on Policies for Mutual Fund Selling Agents and Representatives of Mutual Fund Selling Agents	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2025 tentang Transparansi dan Publikasi Laporan Bank Financial Services Authority Regulation No. 18 of 2025 on Transparency and Publication of Bank Reports	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2025 tentang Transparansi dan Publikasi Laporan Bank Dissemination of Financial Services Authority Regulation No. 18 of 2025 on Transparency and Publication of Bank Reports	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2025 tentang Kemudahan Akses Pembiayaan kepada Usaha Mikro, Kecil dan Menengah Financial Services Authority Regulation No. 19 of 2025 on Ease of Access to Financing for Micro, Small, and Medium Enterprises	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2025 tentang Kemudahan Akses Pembiayaan kepada Usaha Mikro, Kecil dan Menengah Dissemination of Financial Services Authority Regulation No. 19 of 2025 on Ease of Access to Financing for Micro, Small, and Medium Enterprises	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2025 tentang Pelaporan Bank Umum melalui Sistem Pelaporan Otoritas Jasa Keuangan Financial Services Authority Regulation No. 22 of 2025 on Reporting of Commercial Banks through the Financial Services Authority Reporting System	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2025 tentang Pelaporan Bank Umum melalui Sistem Pelaporan Otoritas Jasa Keuangan Dissemination of Financial Services Authority Regulation No. 22 of 2025 on Reporting of Commercial Banks through the Financial Services Authority Reporting System	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2025 tentang Pengelolaan Rekening pada Bank Umum Financial Services Authority Regulation No. 24 of 2025 on Account Management at Commercial Banks	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2025 tentang Pengelolaan Rekening pada Bank Umum Dissemination of Financial Services Authority Regulation No. 24 of 2025 on Account Management at Commercial Banks	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Peraturan Otoritas Jasa Keuangan No. 32 Tahun 2025 tentang Penyelenggaraan Beli Sekarang Bayar Nanti (*Buy Now Pay Later*) Financial Services Authority Regulation No. 32 of 2025 on Implementation of Buy Now Pay Later	Sosialisasi Peraturan Otoritas Jasa Keuangan No. 32 Tahun 2025 tentang Penyelenggaraan Beli Sekarang Bayar Nanti (*Buy Now Pay Later)* Dissemination of Financial Services Authority Regulation No. 32 of 2025 on Implementation of Buy Now Pay Later	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements
Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola Bagi Bank Umum Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks	Surat Keputusan Direksi No. 013/SK-DIR/07/24 tanggal 29 Juli 2024 tentang Kebijakan *Good Corporate Governance* (GCG) Board of Directors' Decision Letter No. 013/SK-DIR/07/24 dated 29 July 2024 on Good Corporate Governance (GCG) Policy	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements

Peraturan Regulation	Penyesuaian yang Dilakukan Adjustment Made	Dampak terhadap Laporan Keuangan Impact on Financial Statements
Surat Edaran Otoritas Jasa Keuangan No. 20/SEOJK.08/2025 tentang Publikasi Penanganan Pengaduan dan Laporan Layanan Pengaduan Financial Services Authority Circular No. 20/SEOJK.08/2025 on Publication of Complaint Handling and Complaint Service Reports	Sosialisasi Surat Edaran Otoritas Jasa Keuangan No. 20/SEOJK.08/2025 tentang Publikasi Penanganan Pengaduan dan Laporan Layanan Pengaduan Dissemination of Financial Services Authority Circular No. 20/SEOJK.08/2025 on Publication of Complaint Handling and Complaint Service Reports	Tidak berdampak signifikan terhadap Laporan Keuangan Bank Has no significant impact on the Bank's Financial Statements

Perubahan Kebijakan Akuntansi

Perubahan Kebijakan Akuntansi yang Signifikan

Pada tanggal 1 Januari 2025, terdapat standar baru dan penyesuaian atau amendemen terhadap beberapa standar yang masih berlaku yang relevan dengan operasi Bank yang berlaku efektif sejak tanggal tersebut yaitu sebagai berikut:

Amendments to Accounting Policies

Significant Amendments to Accounting Policies

On 1 January 2025, there were new standards and adjustments or amendments to several existing standards relevant to the Bank's operations, effective as of the said date, as follows:

Perubahan Kebijakan Policy Changes	Dampak terhadap Laporan Keuangan Impact on Financial Statements
Amandemen PSAK 221: Kekurangan Ketertukaran	Amandemen tersebut mengharuskan pengungkapan informasi yang memungkinkan pengguna laporan keuangan memahami dampak mata uang yang tidak dapat dipertukarkan dengan mata uang lain yang memengaruhi, atau diperkirakan akan memengaruhi, kinerja keuangan, posisi keuangan, dan arus kas entitas.
Amendment to PSAK 221: Lack of Exchangeability	The amendments require disclosure of information that enables user of financial statements to understand the Impact of a currency not being exchangable into the other currency affects, or is expected to affect, the entity's financial performance, financial position, and cash flows.

Alasan Perubahan Kebijakan Akuntansi

Perubahan kebijakan akuntansi dilakukan untuk mematuhi Pernyataan Standar Akuntansi Keuangan (PSAK) yang berlaku dalam tahun berjalan.

Reasons for Amendments to Accounting Policies

Changes in accounting policies are made to comply with the Statements of Financial Accounting Standards (PSAK) in effect for the current year.



Aspek Pendukung Bisnis

Aspect of Business Support





05.

Teknologi Informasi
Information Technology

Dalam merespons dinamika kebutuhan dan gaya hidup nasabah yang semakin mengutamakan kemudahan serta kecepatan layanan, Bank terus berinovasi dalam transformasi digital. Pemanfaatan Teknologi Informasi (TI) dijadikan landasan strategis untuk menghadirkan solusi perbankan yang adaptif, aman, dan andal. Fokus utama diarahkan pada penguatan layanan digital melalui pengembangan platform *mobile banking* dan *internet banking*, serta perluasan ekosistem layanan elektronik yang terintegrasi. Upaya ini dilakukan guna memastikan pengalaman perbankan yang lebih praktis dan efisien bagi nasabah, sekaligus memperkuat daya saing Bank di era digital.

In response to the dynamics of customer needs and lifestyles that increasingly prioritize convenience and speed of service, the Bank continues to innovate in digital transformation. Information Technology (IT) utilization serves as a strategic basis for delivering adaptive, secure, and reliable banking solutions. Its primary focus is directed at strengthening digital services by developing mobile and internet banking platforms, as well as expanding an integrated electronic service ecosystem. These efforts are undertaken to ensure a more practical and efficient banking experience for customers, while simultaneously strengthening the Bank's competitiveness in the digital era.

Roadmap Teknologi Informasi

Roadmap pengembangan TI di Bank dirancang secara terstruktur dan berorientasi jangka panjang, dengan mengacu pada arah kebijakan strategis perusahaan. Perencanaan ini dilakukan melalui tahapan yang terukur dan selaras, seperti yang diuraikan sebagai berikut:

1. Melakukan pengembangan berkelanjutan dalam *revamping internet banking* dan *mobile banking* dengan menyediakan fitur dan produk digital yang unggul dan bersaing serta dilengkapi dengan pembukaan rekening digital (*digital on boarding*) menggunakan teknologi *biometric* dan *face recognition*. Pembukaan rekening digital tersebut bertujuan untuk menarik minat nasabah baru serta nasabah yang sudah ada agar lebih mudah untuk menempatkan dana dan bertransaksi melalui Bank Victoria.
2. Melakukan pengembangan berkelanjutan dalam *revamping internet banking business* dengan fitur-fitur finansial dan non-finansial serta dilengkapi dengan fitur *cash management*, antara lain *virtual account* dan *payroll* untuk kebutuhan transaksi keuangan bagi nasabah yang mempunyai perusahaan.
3. Meningkatkan kualitas layanan kepada nasabah dengan melakukan pengembangan *digital operations*, yaitu melakukan aktivitas transaksi non-tunai dengan menggunakan teknologi *video banking*, sehingga dapat berinteraksi terhadap transaksi yang akan dilakukan secara *virtual* namun tetap mengedepankan prinsip kehati-hatian serta keamanan transaksi keuangan nasabah.
4. Melakukan kerja sama dengan pihak ketiga, seperti kementerian, bank, lembaga keuangan non-bank, *e-commerce, online travel agent, peer to peer lending* dengan skema *platform business* (*omni channel*) untuk meningkatkan jumlah nasabah dan frekuensi transaksi.

Information Technology Roadmap

The Bank's IT development roadmap is designed in a structured and long-term oriented manner, with reference to the company's strategic policy direction. This planning is carried out through measurable and harmonious stages, as outlined below:

1. Carrying out continuous development in revamping internet banking and mobile banking by providing excellent and competitive digital features and products, equipped with digital account openings (digital on boarding) by using the technology of biometric and face recognition. The digital account opening is aimed to attract new customers and existing customers to make it easier in placing funds and making transactions through Bank Victoria.
2. Carrying out continuous development in revamping internet banking business with financial and non-financial features, equipped with cash management features, including virtual accounts and payroll for customers who have company's financial transaction needs.
3. Improving services quality to customers by developing digital operations, which is by conducting non-cash transaction activities using video banking technology, so that they can interact with transactions to be carried out virtually but still prioritizing the principle of prudence and security in customers' financial transactions.
4. Cooperating with third parties, such as ministries, banks, non-bank financial institutions, e-commerce, online travel agents, and peer to peer lending with a business platform (omni channel) scheme, to increase the number of customers and transaction frequency.

5. Memperkenalkan ekosistem *digital lending* untuk menambah sumber nasabah kredit kepada Bank dan kecepatan proses kredit Bank kepada nasabah kredit.
6. Mengembangkan *digital onboarding* via *microsite* agar dapat dikoneksikan dengan pihak *front-end* lain atau *channel digital onboarding* yang bekerja sama dengan Bank.
7. Mengembangkan *loan channeling* melalui *financial technology*, bank perkreditan rakyat, *multifinance*, dan koperasi untuk memperluas akses pembiayaan.
8. Menyesuaikan kebutuhan digital pada aplikasi *core banking* dan *middleware* guna meningkatkan efisiensi dan integrasi sistem.
9. Meningkatkan dan memperbarui infrastruktur teknologi guna mendukung operasional digital dan memastikan keandalan sistem perbankan.
10. Meningkatkan pengembangan *middleware* berbasis Standar Nasional *Open API* Pembayaran Bank Indonesia (SNAP BI) sehingga mempermudah koneksi melalui channel baru.

Melalui implementasi *roadmap* TI, Bank Victoria berkomitmen mendorong transformasi operasional yang lebih efisien dan adaptif. Inisiatif ini bertujuan mengoptimalkan peran teknologi sebagai penggerak utama dalam meningkatkan kualitas layanan, memperkuat infrastruktur digital, serta menjaga keunggulan kompetitif di tengah perubahan lanskap industri perbankan yang semakin dinamis.

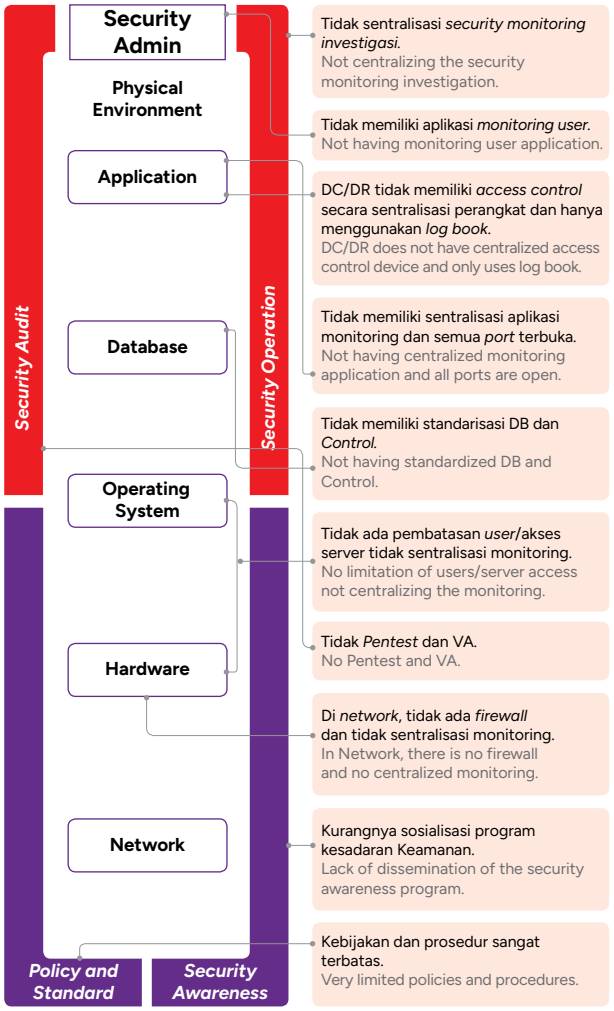
5. Introducing a digital lending ecosystem to increase the source of credit customers to the Bank and the speed of the Bank's loan process to credit customers.
6. Developing digital onboarding via microsite so that it can be connected to other front-end parties or digital onboarding channels that cooperate with the Bank.
7. Developing loan channeling through financial technology, rural banks, multifinance, and cooperatives to expand access to financing.
8. Adjusting digital needs in core banking and middleware applications to improve efficiency and system integration.
9. Improving and updating technology infrastructure to support digital operations and ensure the reliability of banking system.
10. Improving middleware development based on the National Open API Payment Standard of Bank Indonesia (SNAP BI) to facilitate connections through new channels.

Through the implementation of IT roadmap, Bank Victoria is committed to driving a more efficient and adaptive operational transformation. This initiative aims to optimize the role of technology as the key driver in improving service quality, strengthening digital infrastructure, and maintaining competitive advantage amidst the increasingly dynamic changes in banking industry landscape.



Skema Rencana Strategis Keamanan Teknologi Informasi
Chart of Information Technology's Security Strategic Plan

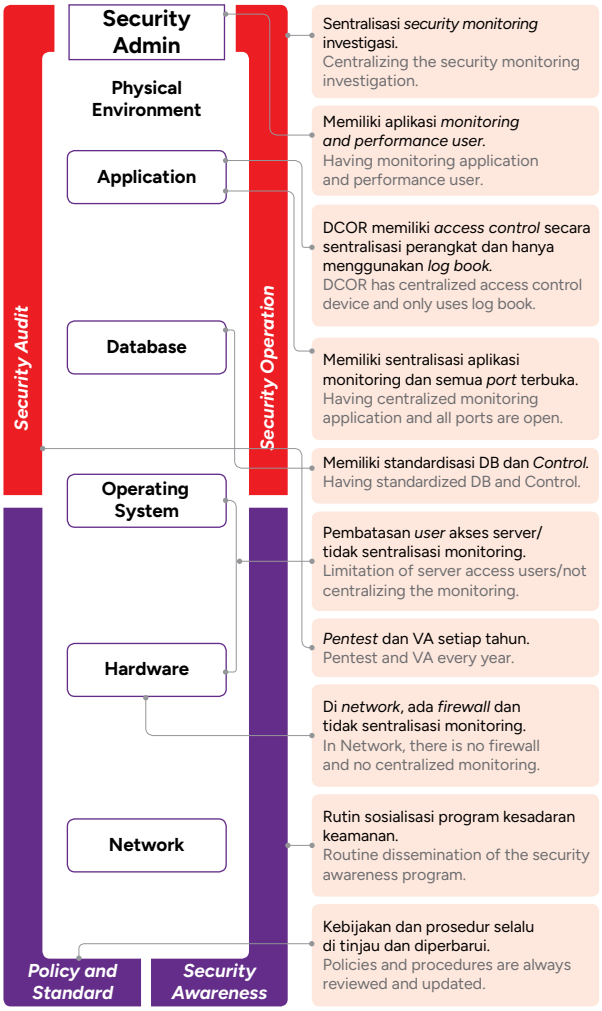
Previous Security Management



- Investasi terbatas untuk infrastruktur keamanan.
- *IT Security* hanya fokus pada perbaikan infrastruktur.
- Kurangnya program kesadaran keamanan.
- Minimnya keterlibatan IT *Section* dalam proses pengembangan aplikasi baru.

- Limited investment in security infrastructure.
- IT Security only focuses on improving infrastructure.
- Lack of security awareness program.
- Lack of IT Section involvement in the process of developing new applications.

Target Security Management



- Akan menerapkan secara aktif dan reguler VA dan *pentester*.
- Melakukan investasi untuk perbaikan infrastruktur.
- Peningkatan prosedur keamanan yang komprehensif dan sesuai dengan standar SOP keamanan yang sudah ditentukan.
- Akan melakukan program kesadaran keamanan yang terintegrasi dan terpadu serta melakukan penegakan kesadaran prosedur keamanan.
- *IT Section* akan dilibatkan dalam proses pengembangan aplikasi baru.

- Will actively and regularly implement VA and pentester.
- Investing in infrastructure improvement.
- Enhanced comprehensive security procedures and in accordance with the predetermined security SOP standards.
- Will carry out integrated and unified security awareness programs and enforce awareness of security procedures.
- IT Section will be involved in the process of developing new applications.

Menjaga Ketahanan dan Keamanan Siber

Dalam menghadapi peningkatan risiko siber yang sejalan dengan akselerasi transformasi digital di sektor perbankan, Bank Victoria secara berkelanjutan memperkuat ketahanan dan keamanan siber guna melindungi data, sistem informasi, serta kepentingan nasabah dan pemangku kepentingan lainnya. Upaya tersebut merupakan bagian integral dari penerapan manajemen risiko TI yang *prudent* dan selaras dengan strategi bisnis Bank.

Bank Victoria menerapkan tata kelola keamanan siber yang terstruktur dan berlapis, mencakup kebijakan, prosedur, serta pengendalian teknis dan operasional, dengan mengacu pada ketentuan Otoritas Jasa Keuangan, antara lain Peraturan Otoritas Jasa Keuangan tentang penyelenggaraan teknologi informasi oleh bank umum dan Surat Edaran Otoritas Jasa Keuangan tentang ketahanan dan keamanan siber bagi bank umum serta ketentuan mengenai perlindungan data dan kerahasiaan nasabah. Penerapan tersebut juga diselaraskan dengan standar praktik terbaik (*best practices*) industri perbankan.

Sebagai bagian dari penguatan ketahanan siber, Bank Victoria secara berkelanjutan melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko siber, termasuk risiko serangan siber, kebocoran data, serta gangguan operasional sistem. Langkah-langkah yang ditempuh meliputi peningkatan sistem pengamanan jaringan, pengelolaan akses berbasis kewenangan, pemantauan aktivitas sistem secara berkala, serta pengujian keamanan dan kesiapan sistem TI.

Bank Victoria juga meningkatkan kesadaran dan kompetensi HC melalui program edukasi dan pelatihan keamanan informasi, guna meminimalkan risiko yang timbul akibat faktor manusia (*human error*). Selain itu, Bank menyiapkan rencana kesinambungan usaha dan pemulihan bencana (*business continuity plan* dan *disaster recovery plan*) untuk memastikan keberlangsungan layanan perbankan dalam menghadapi potensi gangguan siber.

Ke depan, Bank Victoria berkomitmen untuk terus memperkuat ketahanan dan keamanan siber secara berkelanjutan, seiring dengan perkembangan teknologi dan dinamika ancaman siber, serta memastikan kepatuhan terhadap seluruh ketentuan regulator yang berlaku, guna menjaga kepercayaan nasabah dan stabilitas operasional Perseroan.

Maintaining Cyber Resilience and Security

In facing the increasing cyber risks in line with the acceleration of digital transformation in banking sector, Bank Victoria continuously strengthens its cyber resilience and security to protect data, information systems, and the interests of customers and other stakeholders. These efforts are an integral part of the implementation of prudent IT risk management that is in line with the Bank's business strategy.

Bank Victoria implements structured and layered cybersecurity governance, encompassing policies, procedures, and technical and operational controls, in accordance with Financial Services Authority regulations, including Financial Services Authority Regulation on information technology operations by commercial banks and Financial Services Authority Circular on cyber resilience and security for commercial banks, as well as provisions on data protection and customer confidentiality. Such implementations are also in line with banking industry best practices.

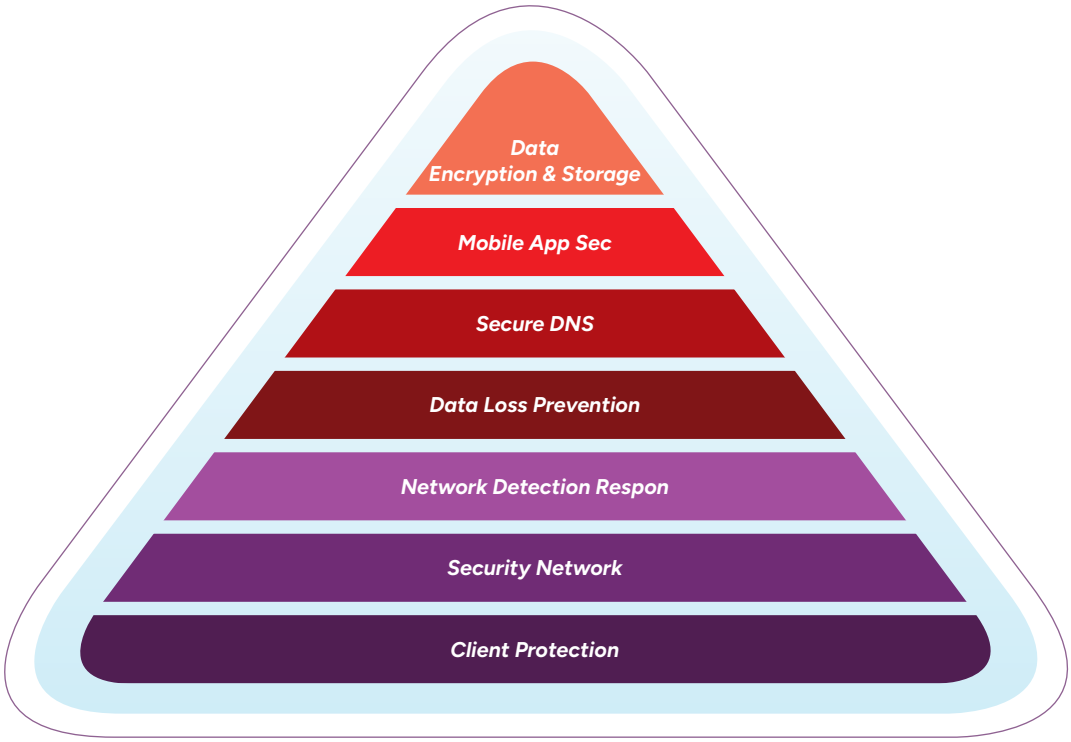
As part of strengthening cyber resilience, Bank Victoria continuously identifies, measures, monitors, and controls cyber risks, including the risks of cyberattacks, data breaches, and system operational disruptions. These measures include enhancing network security systems, managing authority-based access, periodically monitoring system activity, and testing IT system security and readiness.

Bank Victoria also increases HC awareness and competency through information security education and training programs to minimize risks arising from human error. Furthermore, the Bank prepares business continuity and disaster recovery plans to ensure banking services sustainability in facing potential cyber disruptions.

Going forward, Bank Victoria is committed to continuously strengthening cyber resilience and security, in line with technology developments and the dynamics of cyber threats, and ensuring compliance with all applicable regulatory regulations, to maintain customer trust and the Company's operational stability.

Implementasi pengamanan siber yang dilakukan tercakup dalam *roadmap security* berdasarkan diagram berikut:

The implementation of cybersecurity is included in the security roadmap, as shown in the following diagram:



1. *Data encryption* atau enkripsi adalah proses untuk membuat suatu susunan acak dari teks menjadi teks yang tidak dapat dibaca oleh manusia (*incomprehensible text*).
2. *Backup storage* menjadi kebutuhan vital untuk melindungi data dan *back-up* data secara sistem.
3. *Mobile shield security* (*mobile application shielding*) merupakan langkah penting dalam melindungi aplikasi seluler dari serangan siber.
4. *Secure DNS* untuk melindungi dari serangan seperti *credential stuffing*, *content scrapping*, *content spam, inventory hoarding*, dan serangan lain yang mengandalkan bot.
5. *Data loss prevention* yakni aplikasi yang membatasi terhadap akses data keluar yang bersifat rahasia.
6. *Vulnerability assessment* untuk melakukan scanning server apabila terdapat kerentanan di operating system.
7. *Network Detection and Response* (NDR) adalah keamanan siber yang mendeteksi aktivitas berbahaya melalui analisis *network traffic*. Solusi NDR tidak hanya mencegah aktivitas penjahat siber, namun juga menghentikan aktivitas serangan.
8. SSL memberikan enskripsi data melalui HTTPS yang akan melindungi data pengunjung situs web.
9. *Firewall* untuk melindungi jaringan komputer saat menggunakan internet. Keluar masuknya akses jaringan akan melewati *firewall* di mana akan dilakukan pemeriksaan, seperti menyaring, membatasi, atau menolak akses.

1. Data encryption is the process of converting random text into incomprehensible text.
2. Backup storage becomes a vital requirement for data protection and system backup.
3. Mobile shield security (mobile application shielding) is a crucial step in protecting mobile applications from cyberattacks.
4. Secure DNS to protect against attacks such as credential stuffing, content scraping, content spam, inventory hoarding, and other bot-based attacks.
5. Data loss prevention is an application that restricts access to confidential outgoing data.
6. Vulnerability assessment to scan servers in the events of vulnerabilities in the operating system.
7. Network Detection and Response (NDR) is a cybersecurity measure that detects malicious activity through network traffic analysis. NDR solution not only prevents cybercriminal activity but also stop attacks.
8. SSL provides data encryption over HTTPS, protecting the data of website visitors.
9. Firewall to protect computer networks when using the internet. All incoming and outgoing network access passes through a firewall, where inspections are performed, such as filtering, limiting, or denying access.

10. *Endpoint security* adalah tindakan yang memberikan keamanan dan perlindungan kepada perangkat pengguna akhir. Dalam hal ini penggunaan desktop, laptop, dan perangkat mobile bisa menjadi incaran para *hacker*.

Pengujian keamanan siber dilakukan secara berkala minimal sekali dalam setahun yang mencakup pengujian keamanan siber berdasarkan analisis kerentanan dan pengujian keamanan siber berdasarkan skenario. Untuk pengujian keamanan siber berdasarkan analisis kerentanan dilakukan dengan metode *Vulnerability Assesment dan Penetration Testing* (VAPT), sedangkan pengujian keamanan siber berdasarkan skenario dilakukan dengan metode *table top exercise*.

Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi

Dalam pemanfaatan TI, Bank menerapkan prinsip kehati-hatian melalui pengelolaan risiko yang komprehensif. Pendekatan ini diwujudkan dengan menitikberatkan pada 4 (empat) aspek utama yang diuraikan sebagai berikut:

Pengawasan Aktif Dewan Komisaris dan Direksi

Pengawasan terhadap pemanfaatan TI dilakukan secara menyeluruh oleh organ pengurus Bank. Dalam hal ini, Dewan Komisaris dan Direksi menjalankan peran penting dalam memastikan penerapan TI selaras dengan arah strategis dan tata kelola perusahaan. Untuk mendukung efektivitas pengawasan tersebut, keduanya diberikan sejumlah tanggung jawab dan kewenangan yang telah ditetapkan, yaitu:

1. Dewan Komisaris bertugas dan berwenang untuk mengevaluasi, mengarahkan, dan memantau rencana strategis serta kebijakan Bank terkait penggunaan TI, termasuk menilai pertanggungjawaban Direksi atas penerapan manajemen risiko dalam penggunaan TI.
2. Direksi bertugas dan berwenang menetapkan rencana strategis, kebijakan, standar, dan prosedur penggunaan TI Bank; memastikan TI mendukung pertumbuhan bisnis dan tujuan perusahaan, serta kelangsungan pelayanan kepada nasabah; menyelenggarakan kegiatan peningkatan kompetensi HC terkait TI; menjamin keamanan informasi dengan sistem pengelolaan yang efektif; menerapkan manajemen risiko TI secara memadai; memastikan penerapan kebijakan TI secara efektif; dan menyediakan sistem pengukuran kinerja penyelenggaraan TI.

Sebagai bagian dari upaya memperkuat pengawasan dan pengelolaan TI, Bank juga memiliki Komite Pengarah Teknologi Informasi yang bertanggung jawab memberikan rekomendasi kepada Direksi terkait dengan:

10. Endpoint security is a measure that provides security and protection for end-user devices. In this context, desktops, laptops, and mobile devices can be targeted by hackers.

Cybersecurity testing is conducted periodically, at least once a year, and includes vulnerability-based cybersecurity testing and scenario-based cybersecurity testing. Vulnerability-based cybersecurity testing is conducted by using the Vulnerability Assessment and Penetration Testing (VAPT) method, while scenario-based cybersecurity testing is conducted by using the table top exercise method.

Implementation of Risk Management in the Use of Information Technology

In utilizing IT, the Bank applies the principle of prudence through comprehensive risk management. This approach is realized by emphasizing 4 (four) key aspects, as outlined below:

Active Monitoring of Board of Commissioners and Board of Directors

Monitoring of IT utilization is carried out comprehensively by the Bank's management bodies. In this regard, the Board of Commissioners and Board of Directors play a critical role in ensuring that IT implementation is in line with the company's strategic direction and governance. To support the effectiveness of this monitoring, both parties are assigned a number of defined responsibilities and authorities, namely:

1. The Board of Commissioners has the duty and authority to evaluate, direct, and monitor the Bank's strategic plan and policies related to IT use, including to evaluate the Board of Directors' accountability for the implementation of risk management in IT use.
2. The Board of Directors has the duty and authority to establish strategic plan, policies, standards, and procedures for the Bank's IT use; confirm that the IT supports the company's business growth and objectives, as well as service continuity to customers; carry out activities to increase HR competencies related to IT; guarantee information security with effective management system; implement adequate IT risk management; ensure effective implementation of IT policies; and provide performance measurement system of IT implementation.

As part of its efforts to strengthen IT monitoring and management, the Bank also has the Information Technology Steering Committee, which is responsible for providing recommendations to the Board of Directors regarding:

1. Rencana strategis TI yang sejalan dengan rencana korporasi Bank.
2. Kebijakan, standar, dan prosedur TI.
3. Kesesuaian antara rencana pengembangan TI dan rencana strategis TI.
4. Kesesuaian antara pelaksanaan pengembangan TI dan rencana pengembangan TI.
5. Evaluasi atas efektivitas biaya TI terhadap pencapaian manfaat yang direncanakan.
6. Pemantauan atas kinerja TI dan upaya peningkatan kinerja TI.
7. Upaya penyelesaian berbagai masalah terkait TI yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara TI secara efektif, efisien, dan tepat waktu.
8. Kecukupan dan alokasi sumber daya terkait TI yang dimiliki Bank.

Kecukupan Kebijakan, Standar, dan Prosedur Penyelenggaraan Teknologi Informasi

Bank Victoria menetapkan kebijakan, standar, dan prosedur penyelenggaraan TI sebagai landasan operasional dalam pengelolaan sistem TI secara menyeluruh. Seluruh kebijakan tersebut dirancang dengan merujuk pada ketentuan yang diatur dalam Peraturan Otoritas Jasa Keuangan No. 11 Tahun 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum serta Peraturan Otoritas Jasa Keuangan No. 21 Tahun 2023 tentang Layanan Digital oleh Bank Umum. Kebijakan ini diterapkan secara konsisten dan dievaluasi secara berkala untuk menjamin kesesuaiannya dengan dinamika regulasi dan kebutuhan bisnis. Cakupan kebijakan meliputi aspek tata kelola TI, arsitektur TI, manajemen risiko penyelenggaraan TI, ketahanan dan keamanan siber, penggunaan pihak penyedia jasa TI, penempatan sistem elektronik dan pemrosesan transaksi berbasis TI, pengelolaan data dan perlindungan data pribadi, pengendalian dan audit internal TI, pelaporan, penilaian tingkat maturitas digital Bank, serta layanan digital.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko Penggunaan Teknologi Informasi

Bank Victoria menerapkan kerangka pengelolaan risiko TI secara terstruktur melalui proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko yang mengacu pada kebijakan internal sebagaimana diatur dalam Surat Keputusan Direksi No. 005/SK-DIR/04/25 tanggal 14 April 2025. Kebijakan ini disusun untuk menjaga stabilitas sistem dan kelangsungan operasional TI, serta mengantisipasi potensi gangguan yang dapat memengaruhi kelancaran layanan perbankan. Sebagai bagian dari upaya tersebut, Bank juga menerapkan berbagai mekanisme pengendalian guna memastikan bahwa seluruh infrastruktur komunikasi mendukung kerahasiaan, integritas, dan ketersediaan data, serta menjamin keamanan informasi secara menyeluruh.

1. IT strategic plan in line with the Bank's corporate plan.
2. IT policies, standards, and procedures.
3. Conformity between IT development plans and IT strategic plans.
4. Conformity between the implementation of IT development and IT development plan.
5. Evaluation of IT cost-effectiveness in achieving planned benefits.
6. Monitoring of IT performance and efforts to improve IT performance.
7. Efforts to resolve various IT-related issues unable to be resolved by IT user and organizing work units in an effective, efficient, and timely manner.
8. The adequacy and allocation of IT-related resources owned by the Bank.

Adequacy of Policies, Standards, and Procedures of Information Technology Implementation

Bank Victoria establishes IT implementation policies, standards, and procedures as the operational foundation for comprehensive IT system management. All such policies are designed with reference to the provisions stipulated in Financial Services Authority Regulation No. 11 of 2022 on Information Technology Operations by Commercial Banks and Financial Services Authority Regulation No. 21 of 2023 on Digital Services by Commercial Banks. These policies are consistently implemented and periodically evaluated to ensure their alignment with regulatory dynamics and business needs. The policy scope encompasses aspects of IT governance, IT architecture, IT implementation risk management, cybersecurity and resilience, the use of IT service providers, placement of electronic systems and IT-based transaction processing, data management and personal data protection, internal IT controls and audits, reporting, assessment of the Bank's digital maturity level, and digital services.

Adequacy of Risk Identification, Measurement, Monitoring, and Management Process of the Use of Information Technology

Bank Victoria implements a structured IT risk management framework through the process of identifying, measuring, monitoring, and controlling risks, which refers to internal policies as stipulated in Board of Directors' Decision Letter No. 005/SK-DIR/04/25 dated 14 April 2025. This policy is developed to maintain system stability and IT operational continuity, as well as anticipate potential disruptions that could impact the smooth operation of banking services. As part of such efforts, the Bank also implements various control mechanisms to ensure that all communications infrastructure supports data confidentiality, integrity, and availability, while ensuring comprehensive information security.

Sistem Pengendalian Internal atas Penggunaan Teknologi Informasi

Untuk memastikan pengelolaan TI berjalan sesuai dengan prinsip tata kelola yang baik, Bank Victoria menerapkan sistem pengendalian internal yang ketat melalui pelaksanaan audit berkala oleh Divisi SKAI. Sepanjang tahun 2025, audit yang dilakukan mengidentifikasi 7 (tujuh) temuan terkait aspek operasional TI dengan tingkat risiko "*Moderate*". Temuan-temuan tersebut mencerminkan berbagai area yang perlu diperbaiki dan ditindaklanjuti, antara lain mencakup:

1. Progres Rencana Pengembangan TI Tahun 2025.
2. Progres penggantian perangkat endpoint yang telah *end of life*.
3. Penyesuaian narasi Laporan *Vulnerable Assesment* Infrastruktur.
4. Remediasi hasil *Vulnerable Assesment* Infrastruktur.
5. Progres perbaikan temuan uji penetrasi keamanan pada aplikasi *CMS Mobile Banking*.
6. Standardisasi penulisan *hostname* pada perangkat komputer desktop dan laptop.
7. Duplikasi penulisan data pada Laporan Inventaris IT.

Seluruh temuan yang diidentifikasi dalam audit TI telah ditindaklanjuti secara menyeluruh oleh tim terkait. Tindakan korektif yang diambil difokuskan pada pemenuhan terhadap kebijakan internal dan standar keamanan yang berlaku, sekaligus bertujuan memperkuat sistem perlindungan serta meminimalkan risiko gangguan terhadap operasional Bank. Upaya perbaikan ini juga dirancang untuk memastikan kesinambungan layanan secara optimal serta mencegah terulangnya kembali risiko serupa di masa mendatang.

Internal Control System for the Use of Information Technology

To ensure IT management is carried out in accordance with good governance principles, Bank Victoria implements a rigorous internal control system through periodic audits by SKAI Division. Throughout 2025, the audit carried out identified 7 (seven) findings related to IT operational aspects with a risk level of "Moderate". These findings reflect various areas requiring improvement and follow-up, including:

1. Progress of the 2025 IT Development Plan.
2. Progress on the replacement of end-of-life endpoint devices.
3. Revision of the narrative in the Infrastructure Vulnerability Assessment Report.
4. Remediation of Infrastructure Vulnerability Assessment results.
5. Progress in remediating security penetration test findings in CMS Mobile Banking application.
6. Standardization of hostnames on desktop and laptop computers.
7. Duplication of data entry in IT Inventory Report.

All findings identified in IT audit have been thoroughly followed up by the relevant team. Corrective actions taken focused on compliance with applicable internal policies and security standards, while also aimed to strengthen protection systems and minimize the risk of disruption to the Bank's operations. These improvement efforts are also designed to ensure optimal service continuity and prevent the recurrence of similar risks in the future.

Proses Tata Kelola terkait Teknologi Informasi

Bank Victoria menerapkan tata kelola TI secara menyeluruh untuk memastikan seluruh risiko utama, termasuk gangguan sistem, ancaman siber, dan situasi darurat, seperti bencana, dapat diidentifikasi, dikendalikan, dan dilaporkan secara transparan. Pengawasan aktif dilakukan oleh Dewan Komisaris dan Direksi melalui evaluasi kebijakan, prosedur, serta rencana strategis TI yang selaras dengan tujuan bisnis Bank.

Manajemen risiko TI difokuskan pada perlindungan data dan ketahanan sistem melalui penerapan standar keamanan siber internasional, seperti ISO 27001, audit rutin, serta penggunaan sistem keamanan terintegrasi. Selain itu, Bank memiliki rencana pemulihan bencana yang telah diuji secara berkala untuk menjamin kelangsungan operasional dalam kondisi kritis. Seluruh perkembangan dan potensi risiko TI dilaporkan secara rutin kepada manajemen dan regulator, sebagai bagian dari komitmen Bank terhadap tata kelola TI yang adaptif dan berkelanjutan.

Governance Process related to Information Technology

Bank Victoria implements comprehensive IT governance to ensure that all key risks, including system disruptions, cyber threats, and emergency situations, such as disasters, are identified, controlled, and transparently reported. Active monitoring is carried out by the Board of Commissioners and Board of Directors through the evaluation of IT policies, procedures, and strategic plans in line with the Bank's business objectives.

IT risk management focuses on data protection and system resilience through the implementation of international cybersecurity standards, such as ISO 27001, regular audits, and the use of integrated security systems. Furthermore, the Bank has a disaster recovery plan regularly tested to ensure its operational continuity in critical conditions. All developments and potential IT risks are routinely reported to management and regulators, as part of the Bank's commitment to adaptive and sustainable IT governance.

Pengembangan Teknologi Informasi Tahun 2025

Sepanjang tahun 2025, Bank Victoria terus mengakselerasi pengembangan TI sebagai bagian dari strategi peningkatan kualitas layanan dan penguatan hubungan dengan nasabah. Berbagai inisiatif digital telah diimplementasikan untuk menghadirkan pengalaman nasabah yang lebih optimal dan responsif terhadap kebutuhan era layanan perbankan modern, antara lain:

Information Technology Development in 2025

Throughout 2025, Bank Victoria continued to accelerate IT development as part of its strategy to improve service quality and strengthen customer relationships. Various digital initiatives have been implemented to provide a more optimal and responsive customer experience in line with the needs of modern banking era, including:

Tujuan Objectives	**Bagian Penambahan** Additional Part	**Pelaksanaan** Implementation
Treasury System	Penggantian *Treasury System* Replacement of Treasury System	**Triwulan 1 2025** Quarter 1 2025
Security Information & Event Management (SIEM)	Implementasi *Security Information & Event Management* Implementation of Security Information & Event Management	**Triwulan 2 2025** Quarter 2 2025
Infrastruktur Server	Pengadaan Infrastruktur Server untuk Mendukung Layanan Digital Server Infrastructure Procurement to Support Digital Services	**Triwulan 3 2025** Quarter 3 2025
e-KYC Deepfake	Penggantian *e-KYC* yang Mampu Mencegah *Deepfake* Replacement of e-KYC to Prevent Deepfake	**Triwulan 3 2025** Quarter 3 2025
SVS Onboarding	Integrasi Specimen Tanda Tangan Nasabah *Onboarding* pada *Channel Digital* Integration of Customer Onboarding Signature Specimen into Digital Channels	**Triwulan 3 2025** Quarter 3 2025
e-Form	Mempercepat pembukaan CIF dan Rekening di Cabang dengan *e-Form* Accelerating CIF and Branch Account Opening with e-Forms	**Triwulan 3 2025** Quarter 3 2025
OCP RHEL	Penggantian *Operating System* Berbasis *Enterprise* untuk Mendukung Layanan Digital Replacement of Enterprise-Based Operating System to Support Digital Services	**Triwulan 4 2025** Quarter 4 2025
MIS	Implementasi Pelaporan *MIS* yang Terintegrasi Implementation of Integrated MIS Reporting	**Triwulan 4 2025** Quarter 4 2025
Fraud Detection System (FDS)	Peningkatan *Fraud Detection System* untuk Akun, Transaksi, dan Jaringan Improved Fraud Detection System for Accounts, Transactions, and Networks	**Triwulan 4 2025** Quarter 4 2025

Sebagai wujud komitmen terhadap keamanan informasi, Bank Victoria secara konsisten menerapkan pengendalian melalui sistem manajemen keamanan informasi yang terstandardisasi, dibuktikan dengan hasil audit *surveillance* untuk mempertahankan Sertifikasi ISO 27001.

1. *Revamp internet banking* bisnis untuk meningkatkan fitur dan pengalaman pengguna.
2. *Digital operation*, yaitu layanan transaksi non-tunai nasabah melalui *video call* guna meningkatkan kenyamanan dan efisiensi layanan.
3. *Peer to peer lending*, yaitu kerja sama dengan *digital lending ecosystems* untuk memperluas akses pembiayaan.
4. *Loan channelling* melalui *financial technology*, bank perkreditan rakyat, *multifinance*, dan koperasi sebagai bagian dari strategi ekspansi kredit.
5. Pengembangan digital *onboarding via microsite* agar dapat terkoneksi dengan berbagai *channel digital onboarding* yang bekerja sama dengan Bank.
6. Penggantian *treasury system* guna meningkatkan efisiensi dan akurasi dalam pengelolaan transaksi *treasury*.

As the manifestation of its commitment to information security, Bank Victoria consistently implements controls through a standardized information security management system, as evidenced by surveillance audit results to maintain ISO 27001 Certification.

1. Revamp of business internet banking to improve features and user experience.
2. Digital operation, namely non-cash customer transaction services through video call to improve convenience and service efficiency.
3. Peer to peer lending, namely cooperation with digital lending ecosystems to expand access to financing.
4. Loan channeling through financial technology, rural banks, multifinance, and cooperatives as part of credit expansion strategies.
5. Development of digital onboarding via microsite in order to be connected to various digital onboarding channels that cooperate with the Bank.
6. Replacement of treasury system to improve efficiency and accuracy in managing treasury transactions.

7. Peningkatan dan penginian terhadap infrastruktur teknologi untuk memastikan keandalan sistem serta mendukung transformasi digital Bank.

7. Improvement and update of technology infrastructure to ensure system reliability and support the Bank's digital transformation.

Strategi Pengembangan Teknologi Informasi Tahun 2026

Bank Victoria telah menyusun arah strategis pengembangan Teknologi Informasi untuk tahun 2026 sebagai bagian dari upaya memperkuat layanan digital, memperluas ekosistem keuangan, serta meningkatkan keamanan dan efisiensi operasional. Strategi ini mencakup pengembangan infrastruktur TI, optimalisasi fitur layanan elektronik, serta kolaborasi dengan mitra strategis, yang diuraikan sebagai berikut:

Information Technology Development Strategy in 2026

Bank Victoria has formulated a strategic direction for Information Technology development for 2026 as part of its efforts to strengthen digital services, expand financial ecosystem, and improve operational security and efficiency. This strategy includes IT infrastructure development, optimization of electronic service features, and collaboration with strategic partners, as outlined below:

Produk Dasar **Basic Products**		
Victoria Merchant (QRIS MPM as Acquire)	*Banking Caffe* Banking Cafe	*BI Fast via Victoria Mobile*
Cardless Withdrawal (Tarik Tunai tanpa Kartu) via Gerai Alfamart Cardless Withdrawal (Cash Withdrawal without Card) via Alfamart Outlets	*Engine Point*	*BI Fast via Internet Banking Business*
Website Marketing	*QRIS Cross Border*	*Remittance Digital via Mobile Banking* Digital Remittance via Mobile Banking
QRIS CPM	*Digital Deposito via Third Party* Digital Time Deposits via Third Party	*Remittance Digital via Internet Banking Business* Digital Remittance via Internet Banking Business
QRIS Third Party - QRIS Bank	*Cashback & Engine Discount*	QRIS Tuntas

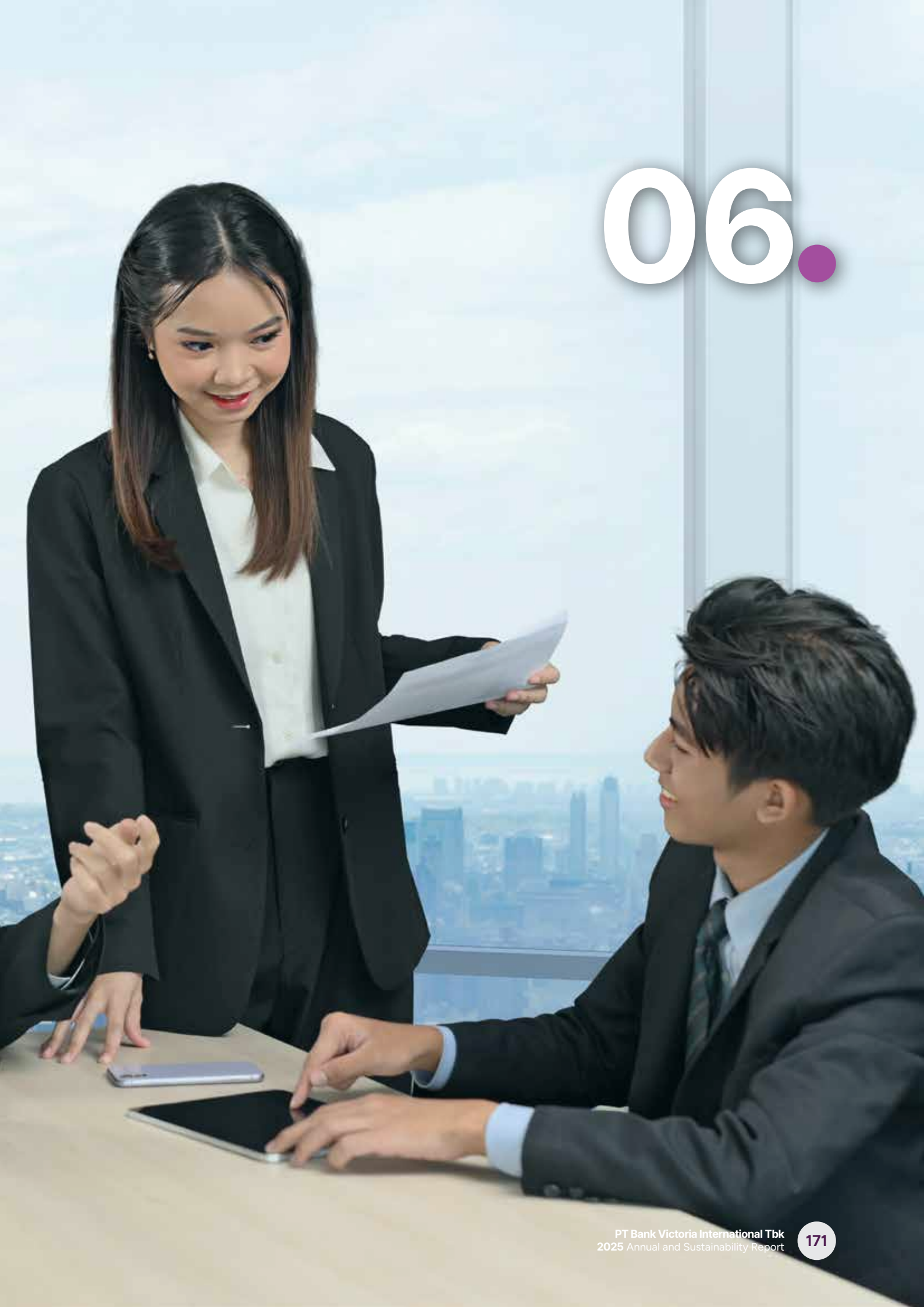
Produk Lanjutan **Advanced Products**		
Revamp Internet Banking Business & Cash Management	*Digital Operations*	*Digital Form - Victoria Mobile*
BI SNAP - Open API Platform	*Bancassurance Digital* Digital Bancassurance	Bank Persepsi via *Victoria Mobile* Collecting Bank via Victoria Mobile
Loan Channeling	Pembukaan Rekening QQ QQ Account Opening	Bank Persepsi via *Internet Banking Business* Collecting Bank via Internet Banking Business
Digital Onboarding via *Micro Site Bank* untuk nanti akan dapat dikoneksikan oleh pihak front end lain yang menjadi *channel Digital Onboarding* yang bekerja sama dengan Bank Digital Onboarding via the Bank's Micro Site to be connected to other front-end parties of Digital Onboarding channels that work with the Bank	KPR Digital Digital House Loan	Pembukaan Rekening *AND/OR* AND/OR Account Opening

Infrastruktur *Security* **Security Infrastructure**		
Domain Fail Over	*Mobile Apps Security*	*Application Performance Monitoring*
Security Data Encryption	*Manage Service Security Operation Center (SOC)*	

Tata Kelola Perusahaan

Corporate Governance





06.

Dasar dan Prinsip Implementasi GCG
Basis and Principles of GCG Implementation

Tata kelola perusahaan yang baik (*Good Corporate Governance/GCG*) merupakan prinsip pengelolaan perusahaan sesuai peraturan dan etika bisnis, yang diterapkan Bank tidak hanya untuk memenuhi regulasi, tetapi juga meningkatkan kinerja dan daya saing berkelanjutan. Implementasi GCG mengikuti kebijakan, prosedur, dan praktik terbaik industri, guna menjaga kesehatan Bank, memperkuat kepercayaan publik, serta memberi nilai tambah bagi pemangku kepentingan. Bank mengacu pada regulasi Otoritas Jasa Keuangan dan PUGKI 2021 yang berlandaskan 4 (empat) pilar: perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan, yang merupakan pengembangan dari nilai transparansi, akuntabilitas, responsibilitas, independensi, kewajaran, dan kesetaraan.

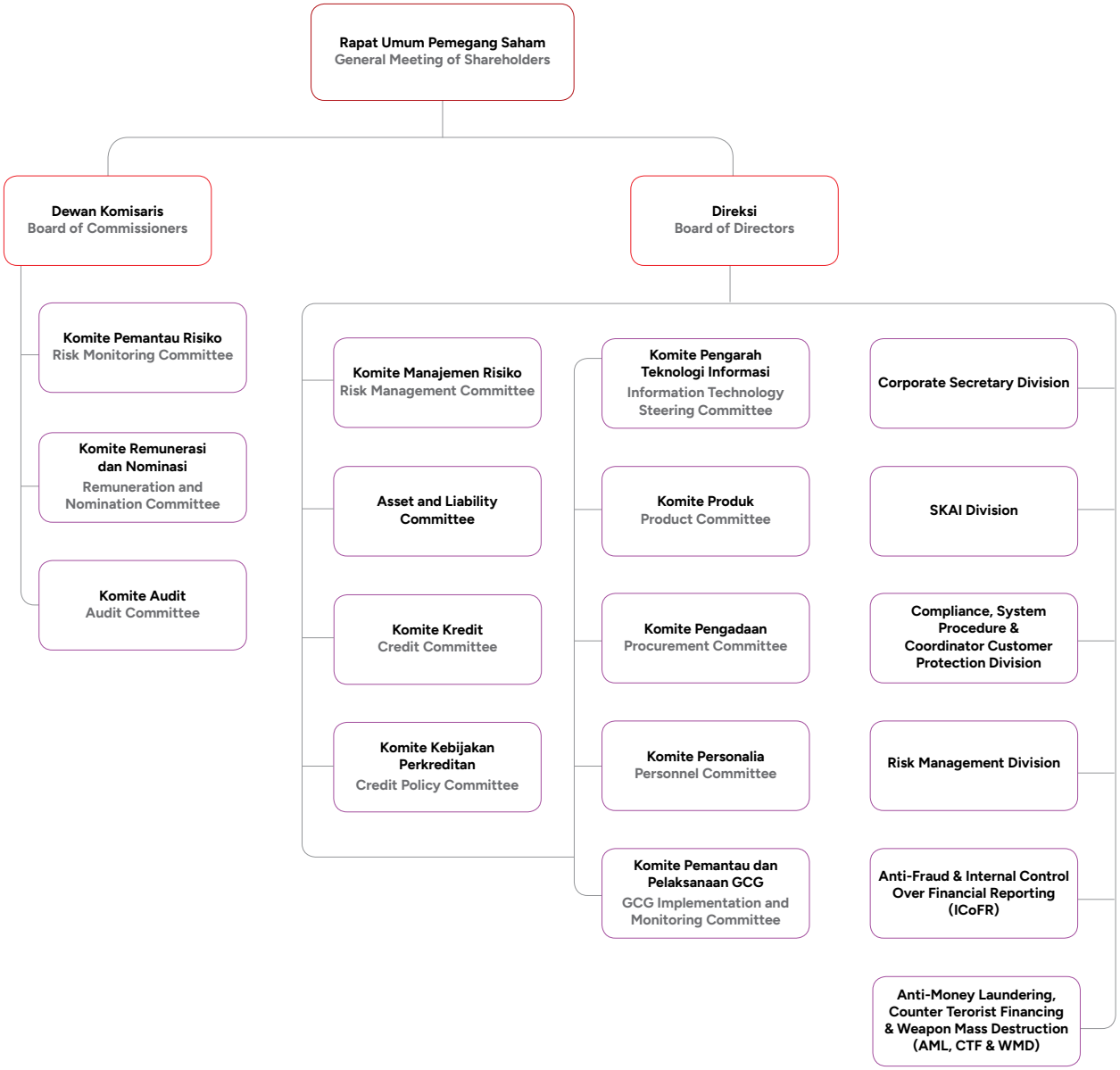
Good Corporate Governance (GCG) is the principles of company management in accordance with regulations and business ethics, carried out by the Bank not only to comply with regulations but also to improve performance and sustainable competitiveness. GCG implementation follows industry policies, procedures, and best practices to maintain the Bank's soundness, strengthen community trust, and provide added value to stakeholders. The Bank adheres to Financial Services Authority regulations and the 2021 General Guidelines for PUGKI, which are based on 4 (four) pillars: ethical behavior, accountability, transparency, and sustainability. These pillars are the development of values of transparency, accountability, responsibility, independence, fairness, and equality.

Pilar Governansi Governance Pillars	Implementasi Implementation
Perilaku Beretika **Ethical Conduct**	Bank senantiasa mengedepankan kejujuran, memperlakukan semua pihak dengan hormat, memenuhi komitmen, membangun serta menjaga nilai-nilai moral dan kepercayaan secara konsisten. Bank memperhatikan kepentingan Pemegang Saham dan pemangku kepentingan lainnya berdasarkan asas kewajaran dan kesetaraan dan dikelola secara independen sehingga masing-masing organ Bank tidak saling mendominasi dan tidak dapat diintervensi oleh pihak lain. The Bank always prioritizes honesty, treats all parties with respect, fulfills its commitments, as well as consistently builds and maintains moral values and beliefs. The Bank pays attention to the interests of Shareholders and other stakeholders based on the principle of fairness and equality, and each organ of the Bank is managed independently so that it does not dominate the other and cannot be intervened by other parties.
Akuntabilitas **Accountability**	Bank dapat mempertanggungjawabkan kinerja secara transparan dan wajar. Untuk itu Bank dikelola secara benar, terukur, dan sesuai dengan kepentingan Bank dengan tetap memperhitungkan kepentingan Pemegang Saham dan pemangku kepentingan. Akuntabilitas merupakan prasyarat yang diperlukan untuk mencapai kinerja yang berkelanjutan. The Bank is accountable for its performance in a transparent and fair manner. For this reason, the Bank is managed properly, measurably, and in accordance with the Bank's interests, while still considering the interests of Shareholders and stakeholders. Accountability is the prerequisite needed to achieve the sustainable performance.
Transparansi **Transparency**	Bank menyediakan informasi yang material dan relevan dengan cara yang mudah diakses dan dipahami oleh pemangku kepentingan. Bank mengambil inisiatif untuk mengungkapkan tidak hanya masalah yang disyaratkan oleh peraturan perundang-undangan, tetapi juga hal yang penting untuk pengambilan keputusan oleh Pemegang Saham dan pemangku kepentingan lainnya. The Bank provides relevant material information that is easily accessible and understood by the stakeholders. The Bank takes the initiative to disclose not only issues required by laws and regulations, but also important matters for decision making by Shareholders and other stakeholders.
Keberlanjutan **Sustainability**	Bank mematuhi peraturan perundang-undangan serta berkomitmen melaksanakan tanggung jawab terhadap masyarakat dan lingkungan agar berkontribusi pada pembangunan berkelanjutan melalui kerja sama dengan semua pemangku kepentingan terkait untuk meningkatkan kehidupan mereka dengan cara yang selaras dengan kepentingan bisnis dan agenda pembangunan berkelanjutan. The Bank complies with the laws and regulations and is committed to carrying out its responsibilities towards community and environment in order to contribute to sustainable development by working with all relevant stakeholders to improve their lives aligned with the business interests and the sustainable development agenda.

Struktur GCG
GCG Structures

Struktur GCG Bank terdiri dari organ utama, RUPS, Dewan Komisaris, dan Direksi, serta organ pendukung, seperti komite di tingkat Dewan Komisaris dan Direksi, Sekretaris Perusahaan, unit bisnis, dan unit independen. Struktur ini dirancang untuk memperjelas pemisahan tugas, tanggung jawab, mekanisme pengambilan keputusan, dan pelaporan, sesuai peraturan yang berlaku, sekaligus memastikan adanya *check and balances* dalam penerapan GCG.

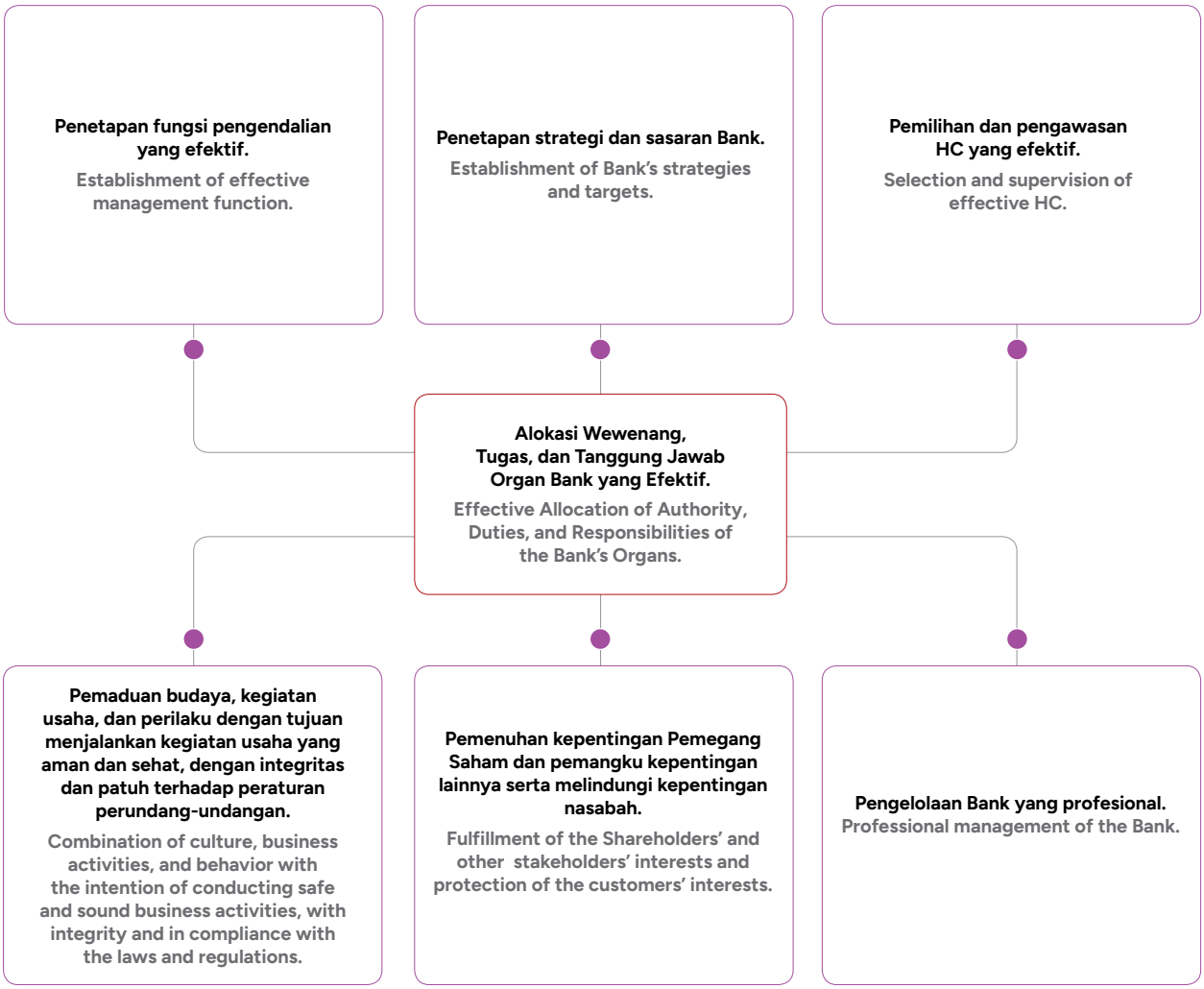
The Bank's GCG structure consists of main organs, GMS, Board of Commissioners, and Board of Directors, as well as supporting organs, such as committees at Board of Commissioners and Board of Directors levels, Corporate Secretary, business units, and independent units. This structure is designed to clarify the separation of duties, responsibilities, decision-making mechanisms, and reporting, in accordance with applicable regulations, while ensuring check and balances in GCG implementation.



Framework GCG
GCG Framework

Untuk memastikan penerapan GCG yang efektif, Bank Victoria menetapkan *Corporate Governance Framework* yang dirancang sesuai peraturan berlaku dan selaras dengan kondisi operasional, budaya organisasi, serta nilai inti Bank. Kerangka ini mengintegrasikan prinsip tata kelola di seluruh lini bisnis, memperkuat akuntabilitas, transparansi, dan etika dalam setiap pengambilan keputusan. Skema dari *Corporate Governance Framework* Bank Victoria ditunjukkan sebagai berikut:

To ensure effective GCG implementation, Bank Victoria determines Corporate Governance Framework, designed in accordance with applicable regulations and in line with the Bank's operational conditions, organizational culture, and core values. This framework integrates governance principles across all business lines, strengthening accountability, transparency, and ethics in all decision-making. The scheme of Bank Victoria's Corporate Governance Framework is presented as follows:



Peningkatan Kualitas Implementasi GCG

Improvement of GCG Implementation Quality

Bank Victoria menerapkan mekanisme tata kelola yang mengacu pada praktik terbaik industri perbankan, dengan tujuan mewujudkan *Good Corporate Sustainability*. Penerapan ini dilakukan melalui serangkaian langkah strategis berikut:

1. Menetapkan standar kualitas implementasi GCG.
2. Mengawasi implementasi GCG.
3. Menilai implementasi GCG.
4. Meningkatkan kualitas implementasi GCG dan *benchmarking*.

Penilaian Penerapan GCG

Dalam menjaga kualitas tata kelola, Bank Victoria melaksanakan penilaian mandiri (*self-assessment*) GCG setiap tahun sebagai sarana evaluasi menyeluruh atas kecukupan dan efektivitas penerapan prinsip-prinsip tata kelola di seluruh lini. Penilaian ini mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum, praktik terbaik industri perbankan, serta perkembangan regulasi terkini. Evaluasi dilakukan terhadap 3 (tiga) aspek utama, yaitu *governance structure, governance process,* dan *governance outcome* dengan mencakup 16 (enam belas) faktor penilaian, antara lain:

1. Pelaksanaan tugas dan tanggung jawab Direksi.
2. Pelaksanaan tugas dan tanggung jawab Dewan Komisaris.
3. Kelengkapan dan pelaksanaan tugas Komite.
4. Penanganan benturan kepentingan.
5. Penerapan fungsi kepatuhan.
6. Penerapan fungsi Audit Internal.
7. Penerapan fungsi Audit Eksternal.
8. Penerapan manajemen risiko, termasuk sistem pengendalian intern.
9. Pemberian remunerasi.
10. Penyediaan dana kepada pihak terkait (*related party*) dan penyediaan dana besar (*large esposures*).
11. Integritas pelaporan dan sistem teknologi informasi.
12. Rencana strategis Bank.
13. Aspek Pemegang Saham.
14. Penerapan strategi anti-*fraud*, termasuk anti-penyuapan.

Bank Victoria implements governance mechanisms that adhere to banking industry best practices, with the goal of achieving Good Corporate Sustainability. This implementation is carried out through a series of strategic steps as follows:

1. Determining quality standard of GCG implementation.
2. Monitoring the GCG implementation.
3. Assessing the GCG implementation.
4. Improving quality of GCG implementation and benchmarking.

Assessment of GCG Implementation

To maintain the quality of governance, Bank Victoria conducts annual GCG self-assessment as a means to comprehensively evaluate the adequacy and effectiveness of governance principles implementation across all lines. This assessment refers to Financial Services Authority Regulation No. 17 of 2023 and Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks, banking industry best practices, and the latest regulatory developments. Evaluation is conducted on 3 (three) main aspects, namely governance structure, governance process, and governance outcome, encompassing 16 (sixteen) assessment factors, including:

1. Implementation of Board of Directors' duties and responsibilities.
2. Implementation of Board of Commissioners' duties and responsibilities.
3. Completeness and implementation of Committee's duties.
4. Management of conflict of interest.
5. Implementation of compliance function.
6. Implementation of Internal Audit function.
7. Implementation of external audit function.
8. Implementation of risk management including internal control systems.
9. Provision of remuneration.
10. Provision of funds to related party and large exposures.
11. Integrity of reporting and information technology system.
12. The Bank's strategic plan.
13. Shareholders aspect.
14. Implementation of anti-fraud strategies, including anti-bribery.

15. Penerapan keuangan berkelanjutan, termasuk penerapan tanggung jawab sosial dan lingkungan.
16. Penerapan tata kelola dalam kelompok usaha Bank.

15. Implementation of sustainable finance, including implementation of social and environmental responsibility.
16. Implementation of governance within the Bank's business group.

Berdasarkan kriteria penilaian tersebut, hasil penilaian baik dari sisi *governance structure, governance process*, dan *governance outcome* tahun buku 2025 disajikan sebagai berikut:

Based on these assessment criteria, the assessment results for governance structure, governance process, and governance outcome for the 2025 fiscal year were presented as follows:

Peringkat **Rating**		**Definisi Peringkat** **Rating Definition**
Individu individual	**2**	Baik Good
Analisis **Analysis**		
Bank telah melakukan penerapan GCG yang secara umum baik, tercermin dari penerapan terhadap 16 (enam belas) aspek yang telah dituangkan dalam analisis. Secara umum beberapa kelemahan yang ada, berkurang signifikan dari tahun sebelumnya dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank. The Bank has implemented GCG, which in general is good, as reflected in the implementation of the 16 (sixteen) aspects outlined in the analysis. In general, some of the existing weaknesses significantly decrease compared to the previous year and can be resolved with normal actions by the management of the Bank.		

Hasil skor *self-assessment* GCG Bank Victoria disusun berdasarkan evaluasi terhadap kesesuaian pelaksanaan tata kelola dengan 3 (tiga) aspek utama, yaitu *governance structure, governance process*, dan *governance outcome*. Penilaian ini dilakukan secara menyeluruh untuk setiap kriteria, disertai dengan langkah tindak lanjut yang dijelaskan sebagai berikut:

The results of Bank Victoria's GCG self-assessment score are compiled based on evaluation of the compliance of governance implementation with 3 (three) main aspects, namely governance structure, governance process, and governance outcome. This assessment is conducted comprehensively for each criterion, accompanied by follow-up steps, as explained below:

Kekuatan (*Strength*) Penerapan Tata Kelola Bank **The Strength of the Bank's Governance Implementation**	
Governance Structure	• Bank telah menjalankan struktur tata kelola yang baik sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola yang Baik. Kepatuhan ini tercermin dari kesesuaian komposisi anggota Direksi, Dewan Komisaris, serta telah dibentuk komite-komite Bank (Komite di bawah Dewan Komisaris dan Direksi termasuk pembentukan Komite Non-*Mandatory*), efektivitas komite yang telah dibentuk ketersediaan Pedoman dan Tata Tertib (*Charter*), guna memastikan GCG telah diterapkan dalam segala kegiatan Bank. • Pada periode semester II tahun 2025, Dewan Komisaris telah melaksanakan tugas pengawasan dengan baik serta telah memberi saran dan/atau arahan atas kebijakan yang di ambil Direksi terhadap operasional dan bisnis Bank, yang secara umum mengacu pada rencana bisnis yang telah ditetapkan, serta memastikan kepatuhan terhadap seluruh peraturan perundang-undangan yang berlaku dan atas pelaksanaan tugas dan tanggung jawab Dewan Komisaris dipertanggungjawabkan dalam RUPS Tahunan yang telah diselenggarakan pada Juni tahun 2025. • Bank telah menerapkan prinsip tiga (3) lini pertahanan (*three lines of defense*) untuk sistem pengendalian internal. Setiap "lini pertahanan" memiliki serangkaian tanggung jawab khusus untuk manajemen dan pengendalian risiko. • The Bank has implemented good governance structure in accordance with the provisions of Financial Services Authority Regulation No. 17 of 2023 on Good Governance. This compliance is reflected in the appropriate composition of the Board of Directors and Board of Commissioners, as well as the establishment of Bank committees (Committees under Board of Commissioners and Board of Directors, including the establishment of Non-Mandatory Committees), the effectiveness of the established committees, and the availability of Charter to ensure GCG is implemented in all Bank activities. • In the second semester of 2025, the Board of Commissioners performed its supervisory duties effectively and provided advice and/or direction on policies adopted by the Board of Directors regarding the Bank's operations and business, which generally referred to the established business plan. It also ensured compliance with all applicable laws and regulations. The Board of Commissioners' duties and responsibilities implementation was accounted for in the Annual GMS held in June 2025. • The Bank has implemented the principle of three (3) lines of defense for its internal control system. Each "line of defense" has a specific set of responsibilities for risk management and control.

Kekuatan (*Strength*) Penerapan Tata Kelola Bank The Strength of the Bank's Governance Implementation	
Governance Process	• Direksi telah melaksanakan tugas dan tanggung jawabnya sesuai dengan pedoman serta kewenangan yang tercantum dalam Anggaran Dasar. Dalam menjalankan peran, termasuk upaya pencapaian target Rencana Bisnis Bank (RBB), Direksi berpedoman pada peraturan perundang-undangan, Anggaran Dasar, *BoD Charter*, dan prinsip-prinsip tata kelola yang baik yang berlaku. Dengan cara ini, Direksi memastikan kepatuhan terhadap prinsip kehati-hatian, ketentuan Batas Maksimum Pemberian Kredit (BMPK), ketentuan pihak terkait, serta aturan lain yang relevan. • Dewan Komisaris telah melakukan fungsi pengawasan terhadap kinerja Direksi, baik melalui mekanisme rapat maupun berdasar rekomendasi dari komite, serta memberikan saran dan/atau arahan secara tertulis. • Direktur yang membawahi fungsi kepatuhan telah memastikan kepatuhan Bank terhadap ketentuan yang berlaku. Pelaksanaan fungsi kepatuhan, anti-pencucian uang, manajemen risiko, Internal Audit serta anti-*fraud* telah berjalan sesuai dan memenuhi pedoman intern sesuai dengan peraturan perundang-undangan, guna memastikan fungsi Satuan Kerja Manajemen Risiko, Satuan Kerja Kepatuhan, Unit AML CFT WMD, serta Unit Anti-*Fraud* & ICoFR telah menjalankan fungsinya secara independen dan objektif. • Sosialisasi sejumlah peraturan baru, resosialisasi peraturan yang diperlukan serta pemberian *refreshment* bagi *Compliance Champion* sebagai *liasion officer* divisi dan/atau cabang yang antara lain bertugas untuk melakukan sosialisasi peraturan dan kebijakan di divisi dan/atau cabang tempatnya ditugaskan, telah dilakukan pada semester II tahun 2025. Demikian juga penerapan *self-assessment checklist* yang wajib dilakukan oleh *Compliance Champion* di cabang, dalam rangka monitor kepatuhan di cabang pada regulasi dan ketentuan internal yang berlaku dinilai cukup efektif dalam meningkatkan kesadaran dan pemahaman karyawan pada regulasi dan/atau *Standard Operating Procedure* (SOP) yang berlaku. • The Board of Directors has conducted its duties and responsibilities in accordance with the guidelines and authorities stated in the Articles of Association. In performing its role, including the efforts to achieve the Bank's Business Plan (RBB) targets, the Board of Directors is guided by laws and regulations, Articles of Association, BoD Charter, and the applicable good governance principles. In this way, the Board of Directors ensures its compliance with the principle of prudence, provision of Legal Lending Limit (LLL), provision of related parties, and other relevant regulations. • The Board of Commissioners has carried out its supervisory function on the Board of Directors' performance, either through meetings or based on committee recommendations, as well as in providing advice and/or direction in writing. • The Director in charge of compliance function has ensured the Bank's compliance with the applicable regulations. The implementation of compliance, anti-money laundering, risk management, Internal Audit, and anti-fraud functions has been carried out in line with and in accordance with internal guidelines in accordance with laws and regulations. This ensures that the Risk Management Work Unit, Compliance Work Unit, AML CFT WMD Unit, and Anti-Fraud & ICoFR Unit carry out their functions independently and objectively. • Dissemination of several new regulations, re-dissemination of necessary regulations, and provision of refreshment training for Compliance Champions, who serve as division and/or branch liaison officers, whose duties include disseminating regulations and policies in their assigned divisions and/or branches, were implemented in the second semester of 2025. Similarly, the implementation of a mandatory self-assessment checklist by Compliance Champions at branches to monitor branch compliance with applicable regulations and internal provisions was deemed quite effective in increasing employee awareness and understanding of applicable regulations and/or Standard Operating Procedures (SOPs).
Governance Outcome	• Dewan Komisaris telah melakukan tugas pengawasan dan telah memberikan arahan kepada Direksi (baik berdasarkan masukan dari komite maupun berdasarkan hasil pengawasan langsung) antara lain melalui media rapat gabungan Dewan Komisaris dan Direksi yang dilakukan secara berkala paling sedikit 1 (satu) kali dalam 2 (dua) bulan, ataupun pada rapat Komite Kredit untuk kredit dengan jumlah tertentu. Pemantauan dan hasil evaluasi juga diberikan Dewan Komisaris atas pencapaian RBB pada semester II tahun 2025. • Direksi telah menjalankan tugas dan tanggung jawabnya melakukan pengurusan Bank sesuai kewenangan yang diberikan dalam RUPS dan Anggaran Dasar perusahaan secara bertanggung jawab, di mana hal ini dapat dilihat antara lain pada hasil Penilaian sendiri tingkat kesehatan Bank periode Juni 2024 dan periode sebelumnya adalah peringkat 2 (dua) (Surat Otoritas Jasa Keuangan No. SR-207/PB.32/2024 tanggal 26 Oktober 2024 dan Surat Otoritas Jasa Keuangan No. SR-57/PB.321/2023 tanggal 2 Agustus 2023). • Selama semester II tahun 2025, Bank dalam menerapkan GCG, yaitu Bank telah menindaklanjuti regulasi terbaru seperti antara lain: » Menginikan kebijakan dan SOP sesuai dengan perubahan regulasi serta *best practice* sesuai dengan transaksi operasional. » Dalam rangka meningkatkan aspek kepatuhan pada level cabang dan/atau divisi terkait lainnya, Satuan Kerja Kepatuhan telah menunjuk sejumlah *Compliance Champion* di cabang dan divisi. Kegiatan yang dilakukan Satuan Kerja Kepatuhan adalah dengan melakukan sosialisasi setiap semester 1 (satu) kali dan menugaskan *Compliance Champion* di cabang menyampaikan *self-assessment* kepatuhan setiap triwulan. » Pada semester II tahun 2025, Bank telah menyelesaikan seluruh komitmen temuan Otoritas Jasa Keuangan tahun 2024 dan *on progress* menyelesaikan komitmen temuan Otoritas Jasa Keuangan tahun 2025.

Kekuatan (*Strength*) Penerapan Tata Kelola Bank The Strength of the Bank's Governance Implementation	
	• The Board of Commissioners has performed its supervisory duties and provided direction to the Board of Directors (based on input from committees and the results of direct supervision), including through joint meetings of the Board of Commissioners and Board of Directors held periodically at least once every 2 (two) months, or at Credit Committee meetings for loans of a certain amount. The Board of Commissioners also provided monitoring and evaluation results regarding RBB achievement in the second semester of 2025. • The Board of Directors has responsibly carried out its duties and responsibilities in managing the Bank in accordance with the authority granted in the GMS and the Company's Articles of Association. This is evident, among others, in the Bank's self-assessment of its sound level for the period of June 2024 and the previous period, which ranked 2 (two) (Financial Services Authority Letter No. SR-207/PB.32/2024 dated 26 October 2024 and Financial Services Authority Letter No. SR-57/PB.321/2023 dated 2 August 2023). • During the second semester of 2025, the Bank implemented GCG by following the latest regulations, including: » Updating policies and SOPs in accordance with regulatory changes and best practices for operational transactions. » To improve compliance at the branch and/or other relevant division levels, the Compliance Unit has appointed several Compliance Champions in branches and divisions. The activities carried out by Compliance Work Unit include conducting dissemination once every semester and assigning Compliance Champions at branches to conduct quarterly compliance self-assessments. » In the second semester of 2025, the Bank completed all commitments from the Financial Services Authority findings in 2024 and was on progress to complete the commitments from the Financial Services Authority findings in 2025.
Kelemahan (*Weakness*) Penerapan Tata Kelola Bank **The Weakness of the Bank's Governance Implementation**	
Governance Structure	Secara keseluruhan struktur tata kelola Bank telah berjalan dengan baik, dengan mendasarkan pada segenap perundangan, regulasi, dan ketentuan internal yang berlaku. Overall, the Bank's governance structure has been operating well, based on all applicable laws, regulations, and internal provisions.
Governance Process	Pada semester II tahun 2025, masih terdapat denda yang dikenakan regulator pada Bank, terkait keterlambatan dan/atau kesalahan penyampaian laporan. Hal ini mencerminkan masih terdapatnya kelemahan proses tata kelola informasi dalam organisasi Bank yang perlu dilakukan tindak lanjut untuk meminimalisir kesalahan yang dapat mengakibatkan timbulnya sanksi teguran ataupun denda dari regulator atas pelanggaran ketentuan tersebut. Ke depannya, Bank akan melakukan pengembangan dan/atau perbaikan pada sistem pelaporan, serta menetapkan penanggung jawab yang jelas, beserta alternatifnya atas setiap laporan. In the second semester of 2025, the Bank still incurred fines imposed by regulators for late and/or incorrect report submissions. This reflects ongoing weaknesses in the Bank's information governance process, which require follow-up to minimize errors that could result in warnings or fines from regulators for violations of these provisions. Moving forward, the Bank will develop and/or improve its reporting system, as well as establish clear responsibilities and alternatives for each report.
Governance Outcome	• Walaupun pada semester II tahun 2025 masih terdapat pengenaan sanksi/denda oleh regulator kepada Bank yang pada umumnya disebabkan oleh keterlambatan penyampaian dan/atau keterlambatan koreksi laporan di luar batas waktu, namun sanksi tersebut terkonsentrasi pada beberapa jenis laporan tertentu, khususnya terkait Laporan Bulanan Umum Terintegrasi (LBUT) (termasuk koreksi) serta sanksi administratif hasil pengawasan/pemeriksaan Otoritas Jasa Keuangan. Dengan mempertimbangkan bahwa kewajiban pelaporan Bank kepada regulator (Otoritas Jasa Keuangan/Bank Indonesia/Pusat Pelaporan dan Analisis Transaksi Keuangan) mencakup berbagai laporan harian, mingguan, dan bulanan, maka temuan keterlambatan/koreksi yang berujung denda tersebut dinilai relatif terbatas secara cakupan. Atas hal ini, Bank telah menjadikan kejadian tersebut sebagai perhatian serius unit kerja terkait dan akan terus memperkuat pengendalian serta monitoring pelaporan guna menjaga kualitas dan ketepatan waktu penyampaian laporan Bank. • Pada semester II tahun 2025, masih terus dilakukan pengkinian atas kebijakan dan/atau prosedur, sehubungan perubahan regulasi yang mendasarinya dan/atau jatuh tempo masa reviu, di mana penginian atas *existing* kebijakan dan/atau prosedur dilakukan secara berkesinambungan dan bertahap sesuai skala prioritas dan rencana kerja yang telah disusun, sehubungan beberapa keterbatasan pada Bank. • Although regulators continued to impose sanctions/fines on the Bank in the second semester of 2025, generally due to late submission and/or late correction of reports beyond the deadline, these sanctions were concentrated on certain types of reports, particularly those related to the Integrated Monthly General Report (LBUT) (including corrections) and administrative sanctions resulting from supervision/inspections by the Financial Services Authority. Considering that the Bank's reporting obligations to the regulator (Financial Services Authority/Bank Indonesia/Financial Transaction Reports and Analysis Center) encompass a variety of daily, weekly, and monthly reports, the findings of late corrections resulting in fines are considered relatively limited in scope. In response, the Bank has taken this incident seriously and will continue to strengthen reporting controls and monitoring to maintain the quality and timeliness of the Bank's report submissions. • In the second semester of 2025, updates to policies and/or procedures were continued to be made due to underlying regulatory changes and/or review due dates. Updates to existing policies and/or procedures are carried out continuously and in stages according to the established priorities and work plan, in light of several limitations within the Bank.

Rekomendasi dan Tindak Lanjut Penilaian GCG

Penilaian penerapan GCG Bank tahun 2025 menghasilkan sejumlah rekomendasi dari regulator yang perlu ditindaklanjuti oleh Bank untuk memastikan perbaikan berkelanjutan. Rincian rekomendasi tersebut sebagai berikut:

Recommendation and Follow-Up on GCG Assessment

The assessment of the Bank's GCG implementation in 2025 resulted in several recommendations from regulators to be followed up by the Bank to ensure continuous improvement. Details of these recommendations are as follows:

Rekomendasi Recommendation	Rencana Tindak Lanjut Follow-Up Plan	Tindakan Korektif Corrective Action
Hasil pemeriksaan Otoritas Jasa Keuangan 2025 wajib ditindaklanjuti, terutama untuk temuan dengan *target date* yang telah ditetapkan, sesuai dengan komitmen Bank kepada Otoritas Jasa Keuangan.	Bank berkomitmen meningkatkan kualitas proses manajemen risiko kredit dan risiko operasional, termasuk perbaikan pada penerapan tata kelola dan program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU-PPT dan PPPSPM).	Bank telah melakukan perbaikan pada semua aspek yang menjadi *concern* dari regulator, seperti penginian kebijakan dan prosedur perkreditan, operasional, serta APU-PPT dan PPPSPM.
Results of the 2025 Financial Services Authority audit must be followed up, particularly for findings with predetermined target date, in line with the Bank's commitment to the Financial Services Authority.	The Bank is committed to improving the quality of its credit and operational risk management processes, including improvements to the governance implementation and programs for Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction (AML-CTF and CPF).	The Bank has made improvements in all aspects of regulatory concern, such as updating credit and operational policies and procedures, as well as AML-CTF and CPF.

Informasi laporan pelaksanaan GCG Bank juga dapat di akses pada situs web Bank bagian Laporan Tata Kelola Perusahaan (*Good Corporate Governance*).

Information on the Bank's GCG implementation report is also accessible on the Bank's website under Good Corporate Governance Report section.



Rapat Umum Pemegang Saham
General Meeting of Shareholders

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi dalam tata kelola Bank, di mana Pemegang Saham menjalankan haknya untuk menentukan kebijakan strategis, termasuk pengangkatan atau pemberhentian Dewan Komisaris dan Direksi, persetujuan Laporan Keuangan, distribusi dividen, serta perubahan Anggaran Dasar. Penyelenggaraan RUPS mengacu pada peraturan perundang-undangan yang berlaku dan terdiri atas RUPS Tahunan, yang wajib dilaksanakan paling lambat 6 (enam) bulan setelah tahun buku berakhir, serta RUPS Luar Biasa yang dapat diselenggarakan sesuai kebutuhan.

The General Meeting of Shareholders (GMS) is the highest organ in the Bank's governance, where Shareholders exercise their rights to determine strategic policies, including appointment or dismissal of the Board of Commissioners and Board of Directors, approval of the Financial Statements, distribution of dividends, and amendments to the Articles of Association. GMS implementation refers to the applicable laws and regulations and consists of Annual GMS, required to be held no later than 6 (six) months after the end of the fiscal year, and Extraordinary GMS, may be held as necessary.

Peran Pemegang Saham dalam Menjaga Kesehatan dan Keberlangsungan Usaha Bank

Sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan mengenai penerapan tata kelola bank umum, Pemegang Saham berperan dalam mendukung penerapan GCG serta menjaga keberlanjutan usaha Bank melalui pelaksanaan hak dan kewajibannya secara bertanggung jawab. Pelaksanaan peran tersebut dilakukan dengan tetap memperhatikan prinsip kehati-hatian, kepatuhan terhadap peraturan perundang-undangan, serta ketentuan Anggaran Dasar Bank.

Pemegang Saham menjalankan kewenangannya melalui RUPS sebagai organ Bank yang memiliki wewenang yang tidak diberikan kepada Dewan Komisaris maupun Direksi. Melalui RUPS, Pemegang Saham menetapkan keputusan strategis sesuai dengan kewenangannya, termasuk pengesahan Laporan Tahunan, penetapan penggunaan laba, serta pengangkatan dan pemberhentian anggota Dewan Komisaris dan Direksi, dengan memperhatikan integritas, kompetensi, dan rekam jejak yang sesuai dengan ketentuan regulator.

Dalam kerangka tata kelola, Pemegang Saham memberikan dukungan terhadap pelaksanaan fungsi pengawasan oleh Dewan Komisaris dan fungsi pengurusan oleh Direksi, tanpa melakukan campur tangan terhadap kegiatan operasional Bank. Pemisahan peran dan kewenangan antar organ Bank tersebut dilaksanakan untuk memastikan independensi, akuntabilitas, serta efektivitas pengelolaan Bank sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan tentang Tata Kelola Bank Umum.

Shareholders' Role in Maintaining Soundness and Sustainability of Bank Businesses

In accordance with Financial Services Authority Regulation on good corporate governance implementation in commercial banks, Shareholders play a role in supporting GCG implementation and maintaining the Bank's business sustainability through responsible exercise of their rights and obligations. This role is carried out while adhering to prudent principles, compliance with laws and regulations, and provisions of the Bank's Articles of Association.

Shareholders exercise their authority through the GMS as the Bank's organ with authority not granted to the Board of Commissioners or Board of Directors. Through the GMS, Shareholders make strategic decisions within their authority, including Annual Report ratification, determination of appropriation of income, as well as appointment and dismissal of members of the Board of Commissioners and Board of Directors, with due regard to their integrity, competence, and track record in accordance with regulatory requirements.

Within the governance framework, Shareholders provide support for the implementation of the supervisory function by the Board of Commissioners and management function by the Board of Directors, without interfering in the Bank's operational activities. This separation of roles and authorities between the Bank's organs is implemented to ensure the independence, accountability, and effectiveness of the Bank's management in accordance with the Financial Services Authority Regulation on Good Corporate Governance in Commercial Banks.

Pemegang Saham juga mendukung kecukupan permodalan Bank sesuai dengan profil risiko dan ketentuan permodalan yang berlaku, sebagai bagian dari upaya menjaga ketahanan Bank dalam menghadapi risiko dan dinamika lingkungan usaha. Dukungan terhadap penguatan struktur permodalan tersebut merupakan salah satu wujud komitmen Pemegang Saham dalam menjaga kelangsungan usaha Bank secara berkelanjutan.

Dengan demikian, peran Pemegang Saham dilaksanakan secara selaras dengan prinsip transparansi, akuntabilitas, responsibilitas, independensi, dan kewajaran, guna memastikan penerapan GCG serta mendukung pertumbuhan Bank yang sehat dan berkelanjutan.

Shareholders also support the Bank's capital adequacy in accordance with risk profile and applicable capital requirements, as an effort to maintain the Bank's resilience in facing the risks and dynamics of business environment. The support for strengthening capital structure demonstrates Shareholders' commitment to maintaining the Bank's business continuity.

Thus, the Shareholders' role is carried out in accordance with the principles of transparency, accountability, responsibility, independence, and fairness, to ensure GCG implementation and support the Bank's soundness and sustainable growth.

Informasi Mengenai Keputusan RUPS Tahun 2025

Pada tahun 2025, Bank melaksanakan 1 (satu) kali RUPS, yaitu RUPS Tahunan yang diselenggarakan pada 20 Juni 2025 pada pukul 10.37 WIB - selesai, bertempat di Graha BIP, Function Hall Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930. Kehadiran Dewan Komisaris, Direksi, Pemegang Saham, dan pihak independen yang ditunjuk dalam RUPS Tahunan Bank di tahun 2025 ditunjukkan sebagai berikut:

Information on the 2025 GMS Resolutions

In 2025, the Bank held 1 (one) GMS, namely Annual GMS, held on 20 June 2025, from 10.37 WIB until finished, at Graha BIP, Function Hall, Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan 12930. The attendance of the Board of Commissioners, Board of Directors, Shareholders, and independent parties appointed at the Bank's 2025 Annual GMS is as follows:

Dewan Komisaris **Board of Commissioners**	Komisaris Utama Independen : Zaenal Abidin Ph.D Komisaris Independen : Gunawan Tenggarahardja Independent President Commissioner : Zaenal Abidin Ph.D Independent Commissioner : Gunawan Tenggarahardja
Direksi **Board of Directors**	Direktur Utama : Achmad Friscantono Wakil Direktur Utama : Rusli Direktur : Lembing Direktur : Debora Wahjutirto Tanoyo Direktur Kepatuhan dan Manajemen Risiko : Tamunan President Director : Achmad Friscantono Deputy President Director : Rusli Director : Lembing Director : Debora Wahjutirto Tanoyo Director of Compliance and Risk Management : Tamunan
Pemegang Saham **Shareholders**	RUPS dihadiri oleh Pemegang Saham yang mewakili 12.746.509.137 saham atau 80,43% dari seluruh saham dengan hak suara yang sah yang telah dikeluarkan oleh Bank. The GMS was attended by Shareholders representing 12,746,509,137 shares or 80.43% of all shares with valid voting rights issued by the Bank.
Pihak Independen **Independent Party**	Bank telah menunjuk pihak independen, yaitu Notaris Fathiah Helmi, SH, Biro Administrasi Efek, yaitu PT Adimitra Jasa Korpora, dan Kantor Akuntan Publik Purwanto Susanti & Surja untuk melakukan proses penghitungan suara dan/atau melakukan validasi. The Bank has appointed independent parties, namely Notary Fathiah Helmi, SH, Share Registrar Bureau PT Adimitra Jasa Korpora, and Public Accounting Firm Purwanto Susanti & Surja to count and/or validate votes.

Hasil Keputusan RUPS Tahunan 20 Juni 2025
Resolutions of Annual GMS 20 June 2025

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Menyetujui Laporan Tahunan Perseroan untuk Tahun Buku yang berakhir pada tanggal 31 Desember 2024, termasuk Laporan Direksi dan Laporan Tugas Pengawasan Dewan Komisaris Perseroan, serta mengesahkan Laporan Keuangan Perseroan untuk Tahun Buku yang berakhir pada tanggal 31 Desember 2024 yang telah diaudit oleh Kantor Akuntan Publik Purwanto Susanti & Surja dengan *partner* penanggung jawab Ibu Yovita, dengan opini audit wajar dalam semua hal yang material sesuai dengan Laporan Auditor Independen No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 tanggal 6 Maret 2025. Dengan demikian, membebaskan Direksi dan Dewan Komisaris Perseroan dari tanggung jawab dan segala tanggungan (*acquit et de charge*) atas tindakan pengurusan dan pengawasan yang Direksi dan Dewan Komisaris jalankan selama tahun buku 2024, sepanjang tindakan-tindakan tersebut tercantum dalam neraca dan laporan laba rugi Perseroan tahun buku 2024.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
Approved the Company's Annual Report for the Fiscal Year ended 31 December 2024, including the Board of Directors' Report and Board of Commissioners' Supervisory Report of the Company, and validated the Company's Financial Statements for the Fiscal Year ended 31 December 2024, audited by Public Accounting Firm Purwanto Susanti & Surja with the partner in charge Mrs. Yovita, with audit opinion of fair in all material respects according to the Independent Auditor Report No. 00147/2.1032/AU.1/07/0242-4/1/III/2025 dated 6 March 2025. Thereby, releasing the Board of Directors and Board of Commissioners of the Company from all responsibilities and liabilities (*acquit et de charge*) for the management and supervision actions carried out by the Board of Commissioners and Board of Directors during the 2024 fiscal year, provided that these actions are included in the balance sheet and profit lost statement of the Company for the 2024 fiscal year.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -
Menyetujui penggunaan laba bersih Perseroan sebesar Rp117.859.236.419,- untuk dipergunakan sebagai berikut: 1. Sebesar Rp25.000.000.000,- dibukukan sebagai pembentukan dana cadangan umum, guna memenuhi ketentuan Pasal 70 Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas dan Pasal 25 Anggaran Dasar Perseroan. 2. Sisanya sebesar Rp92.859.236.419,- akan dibukukan sebagai laba ditahan. Dengan demikian, Perseroan tidak memberikan dividen untuk tahun buku 2024.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
Approved the appropriation of the Company's net income of Rp117,859,236,419 for the following purposes: 1. A total of Rp25,000,000,000 was recorded as general reserve funds to comply with Article 70 of Law No. 40 of 2007 on Limited Liability Companies and Article 25 of the Company's Articles of Association. 2. The remaining Rp92,859,236,419 was recorded as retained earnings. Thus, the Company did not pay dividends for the 2024 fiscal year.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -
1. Memberi kuasa dan wewenang kepada PT Victoria Investama Tbk, selaku pemegang 44,23% saham dalam Perseroan untuk menetapkan besarnya honorarium dan tantiem/bonus/tunjangan lain bagi anggota Dewan Komisaris untuk tahun 2025. 2. Menyetujui pelimpahan wewenang kepada Dewan Komisaris Perseroan untuk menetapkan besarnya gaji, tantiem/bonus/tunjangan lain bagi anggota Direksi untuk tahun 2025, serta memberikan pelimpahan wewenang kepada Direksi untuk menetapkan bonus kepada karyawan untuk tahun 2025.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.606.237 saham Tidak Setuju : 1.800 saham Abstain : 901.100 saham
1. Approved to grant power and authority to PT Victoria Investama Tbk, as the shareholder of 44.23% shares of the Company to determine the amount of honorarium and tantiem/bonus/other allowances for members of the Board of Commissioners for 2025. 2. Approved the transfer of authority to the Board of Commissioners to determine the amount of salary, tantiem/bonus/other allowances for members of the Board of Directors for 2025, and approved to grant transfer of authority to the Board of Directors to determine employee bonus for 2025.	Fully realized.	Agree : 12,745,606,237 shares Disagree : 1,800 shares Abstain : 901,100 shares

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Menyetujui memberikan wewenang kepada Dewan Komisaris Perseroan untuk menunjuk akuntan publik independen dari kantor akuntan publik independen yang terdaftar di Otoritas Jasa Keuangan, sehubungan Dewan Komisaris masih dalam proses penentuan akuntan publik yang akan mengaudit buku Perseroan dengan kriteria akuntan publik dan kantor akuntan publik wajib terdaftar pada Otoritas Jasa Keuangan, kantor akuntan publik merupakan salah satu anggota dari *Big Four*, serta akuntan publik dan kantor akuntan publik merupakan pihak yang independen dan profesional untuk mengaudit Laporan Keuangan Perseroan untuk tahun buku 2025 dengan memperhatikan rekomendasi dari Komite Audit. Selain itu, dilimpahkan kewenangan kepada Dewan Komisaris untuk menetapkan jumlah honorarium dan persyaratan lain sehubungan dengan penunjukan kantor akuntan publik dimaksud.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
Approved to grant authority to the Board of Commissioners to appoint an independent public accountant from the independent public accounting firm registered with the Financial Services Authority, in relation to the ongoing process of determining a public accountant who will audit the Company's books under the criteria of public accountant and public accounting firm must be registered with the Financial Services Authority, public accounting firm must be a member of the Big Four, public accountant and public accounting firm are independent and professional parties to audit the Company's Financial Statements for the 2025 fiscal year with due observance of recommendations from the Audit Committee. Furthermore, granted authority to Board of Commissioners to determine the honorarium amount and other requirements in relation to appointment of such public accounting firm.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -
1. Menyetujui perubahan pengurus Perseroan, yaitu sebagai berikut: Direksi Perseroan terdiri dari: Direktur Utama : Bapak Achmad Friscantono Wakil Direktur Utama : Bapak Rusli Direktur : Bapak Lembing Direktur : Ibu Debora Wahjutirto Tanoyo Direktur Kepatuhan dan Manajemen Risiko : Bapak Tamunan Dewan Komisaris Perseroan terdiri dari: Komisaris Utama Independen : Bapak Zaenal Abidin Ph.D Komisaris Independen : Bapak Gunawan Tenggarahardja Komisaris : Bapak Sia Leng Ho 2. Memberikan kuasa kepada Direksi Perseroan dengan hak subtitusi untuk menyatakan keputusan rapat sehubungan dengan pengangkatan kembali seluruh Anggota Direksi dan Dewan Komisaris Perseroan dalam akta tersendiri dihadapan Notaris dan untuk melakukan pemberitahuan kepada Menteri Hukum Republik Indonesia sehubungan dengan pengangkatan kembali seluruh Anggota Direksi dan Dewan Komisaris Perseroan tersebut di atas, serta melakukan segala tindakan yang diperlukan dan diisyaratkan oleh peraturan perundang-undangan yang berlaku.	Telah direalisasikan sepenuhnya.	Setuju : 12.745.608.037 saham Tidak Setuju : 901.100 saham Abstain : -
1. Approved the changes to the Company's management as follows: The Company's Board of Directors consists of: President Director : Mr. Achmad Friscantono Deputy President Director : Mr. Rusli Director : Mr. Lembing Director : Mrs. Debora Wahjutirto Tanoyo Director of Compliance and Risk Management : Mr. Tamunan The Company's Board of Commissioners consists of: Independent President Commissioner : Mr. Zaenal Abidin Ph.D Independent Commissioner : Mr. Gunawan Tenggarahardja Commissioner : Mr. Sia Leng Ho 2. Granted power to the Board of Directors with substitution right to state meeting resolutions regarding the reappointment of all members of the Board of Directors and Board of Commissioners in a separate deed before a Notary and to notify the Minister of Law of the Republic of Indonesia regarding the reappointment of all members of the Board of Directors and Board of Commissioners, and to take all actions necessary and required by applicable laws and regulations.	Fully realized.	Agree : 12,745,608,037 shares Disagree : 901,100 shares Abstain : -

Keputusan Resolutions	Realisasi Realization	Pengambilan Suara Voting
Sedangkan untuk mata acara keenam, bersifat laporan oleh karenanya tidak dilakukan pengambilan keputusan. Tidak dimintakan persetujuan rapat, hanya bersifat laporan atas realisasi penggunaan dana hasil Penawaran Umum Berkelanjutan Obligasi III Tahap II 2024 dan Penawaran Umum Berkelanjutan Obligasi Subordinasi III Tahap I Tahun 2024 serta hasil *Exercise* Waran Seri VII. Meanwhile, the sixth agenda item was a report and therefore no resolution was adopted. No meeting approval was requested, as this was only a report on the realization of the use of proceeds from Public Offering of Continuing Bonds III Phase II Year 2024, Public Offering of Continuous Subordinated Bonds III Phase I Year 2024, and the results of Series VII Warrant Exercise.	- - -	- - -
Menyetujui Rencana Pemulihan dan Rencana Resolusi (*Recovery Plan & Resolution Plan*) sesuai ketentuan sebagaimana yang dilampirkan dalam Berita Acara Rapat. Approved the Recovery Plan and Resolution Plan in accordance with the provisions attached to the Minutes of Meeting.	Telah direalisasikan sepenuhnya. Fully realized.	Setuju : 12.745.606.237 saham Tidak Setuju : 902.900 saham Abstain : - Agree : 12,745,606,237 shares Disagree : 902,900 shares Abstain : -

Informasi dan Realisasi Mengenai Keputusan RUPS Tahunan 2024

Pada tahun 2024, Bank menyelenggarakan 1 (satu) kali RUPS Tahunan pada tanggal 14 Juni 2024, bertempat di Graha BIP, Function Hall Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan. Bank tidak menyelenggarakan RUPS Luar Biasa sepanjang tahun 2024. Proses pengambilan keputusan dalam RUPS dilakukan melalui musyawarah untuk mufakat, dan apabila tidak tercapai, dilanjutkan dengan pemungutan suara. Untuk menjaga independensi, perhitungan suara dilakukan oleh pihak independen, yaitu Biro Administrasi Efek dan Notaris. Keputusan RUPS Tahunan 2024 beserta realisasi pelaksanaannya disajikan sebagai berikut:

Information and Realization of the 2024 Annual GMS Resolutions

In 2024, the Bank held 1 (one) Annual GMS on 14 June 2024 at Graha BIP, Function Hall, Lt. 11, Jl. Gatot Subroto Kav. 23, Jakarta Selatan.The Bank did not hold any Extraordinary GMS throughout 2024. The process of adopting resolutions at the GMS is conducted through deliberation to reach consensus, and in the event consensus is not reached, voting is conducted. To maintain independence, vote is counted by independent parties, namely Share Registrar Bureau and Notary. The 2024 Annual GMS resolutions and their realization are presented as follows:

Keputusan Resolutions	Realisasi Realization
Menyetujui Laporan Tahunan Perseroan termasuk Laporan Direksi, pengesahan Laporan Keuangan Tahunan, serta Laporan Tugas Pengawasan Dewan Komisaris pada tanggal 31 Desember 2023. Approved the Company's Annual Report including the Board of Directors' Report, validation of the Annual Financial Statements, as well as the Board of Commissioners' Supervisory Report on 31 December 2023.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui penetapan penggunaan laba bersih Bank untuk tahun buku yang berakhir pada tanggal 31 Desember 2023. Approved the determination of the use of the Bank's net income for the fiscal year ending 31 December 2023.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui pemberian kuasa dan wewenang kepada wakil Pemegang Saham untuk menetapkan besarnya honorarium anggota Dewan Komisaris serta memberi kuasa dan wewenang kepada Dewan Komisaris untuk menetapkan pembagian tugas dan wewenang anggota Direksi serta besarnya gaji dan tunjangan para anggota Direksi. Approved to grant power and authority to representatives of Shareholders to determine the honorarium amount for members of the Board of Commissioners and to grant power and authority to the Board of Commissioners to determine the division of duties and authorities of members of the Board of Directors and the amount of salary and allowances for members of the Board of Directors.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui menunjuk akuntan publik untuk mengaudit Laporan Keuangan Bank untuk tahun buku 2024 dan memberikan kuasa kepada Dewan Komisaris untuk menetapkan honorarium akuntan publik tersebut serta persyaratan lain penunjukannya. Approved to appoint a public accountant to audit the Bank's Financial Statements for the 2024 fiscal year and granted authorities to the Board of Commissioners to determine the honorarium for public accountant and other requirements for the appointment.	Telah direalisasikan sepenuhnya. Fully realized.

Keputusan Resolutions	Realisasi Realization
Menyetujui pembatalan perubahan pengurus yang telah diputuskan pada RUPS Tahunan Perseroan tanggal 26 Mei 2023. Approved to cancel the changes to the management resolved at the Company's Annual GMS on 26 May 2023.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui Laporan Realisasi Penggunaan Dana Hasil *Exercise* Waran Seri VII. Approved the Report on the Realization of the Use of Proceeds from Exercise of Series VII Warrants.	Telah direalisasikan sepenuhnya. Fully realized.
Menyetujui perubahan Anggaran Dasar Perseroan di antaranya dalam rangka penyesuaian atas diterbitkannya Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023. Approved the amendment to the Company's Articles of Association, including in order to comply with the issuance of Financial Services Authority Regulation No. 17 of 2023.	Telah direalisasikan sepenuhnya. Fully realized.

Dewan Komisaris
Board of Commissioners

Dewan Komisaris memegang peran penting dalam mengawasi kebijakan manajemen dan keseluruhan arah yang diambil oleh Direksi terkait dengan Bank dan kegiatan bisnisnya. Dewan Komisaris dipercayakan untuk memberikan nasihat strategis kepada Direksi serta memantau pelaksanaan rencana jangka panjang, rencana kerja, dan anggaran Bank, dengan mematuhi ketentuan yang tercantum dalam Anggaran Dasar, keputusan RUPS, serta hukum dan peraturan yang berlaku.

The Board of Commissioners plays a crucial role in supervising management policies and overall direction taken by the Board of Directors in relation to the Bank and its business activities. The Board of Commissioners is entrusted with providing strategic advice to the Board of Directors and overseeing the implementation of the Bank's long-term plan, work plan, and budget, in compliance with the provisions stated in the Articles of Association, GMS resolutions, and applicable laws and regulations.

Pedoman Dewan Komisaris

Dalam melaksanakan tugasnya, Dewan Komisaris memiliki pedoman dan tata tertib kerja yang dikenal sebagai *Board of Commissioners Charter* (*BOC Charter*), yang telah diperbarui dan disahkan melalui Keputusan Dewan Komisaris No. 001/SK-KOM/12/23 tanggal 6 Desember 2023.

Board of Commissioners Charter

In performing its duties, the Board of Commissioners has charter and work guidelines known as Board of Commissioners Charter (BOC Charter), updated and ratified through the Board of Commissioners' Decision No. 001/SK-KOM/12/23 dated 6 December 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Dewan Komisaris

Untuk meningkatkan efektivitas pelaksanaan tugas, Dewan Komisaris menetapkan pembagian peran khusus bagi setiap anggota tanpa mengurangi hak, kewajiban, dan kewenangannya. Ruang lingkup tugas dan tanggung jawab tersebut ditetapkan melalui Keputusan Dewan Komisaris No. 001/SK-KOM/08/25 tanggal 6 Agustus 2025 tentang Pembagian Tugas dan Wewenang Anggota *Board of Commisioners*. Adapun pembagian tugas tersebut sebagai berikut:

Scope of Work and Responsibilities of Each Member of the Board of Commissioners

To improve the effectiveness of duty implementation, the Board of Commissioners determines a specific division of roles for each member without diminishing rights, obligations, and authorities. The scope of these duties and responsibilities is stipulated in the Board of Commissioners' Decision No. 001/SK-KOM/08/25 dated 6 August 2025 on the Division of Duties and Authorities of Members of the Board of Commissioners. The division of duties is as follows:

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Zaenal Abidin Ph.D Komisaris Utama Independen Independent President Commissioner	• Melakukan koordinasi dan memberikan pengarahan kepada anggota Dewan Komisaris. • Mengoordinasikan pengawasan yang dilakukan oleh anggota Dewan Komisaris sesuai dengan bidangnya masing-masing. • Menyelenggarakan dan memimpin: › Rapat internal Dewan Komisaris. › Rapat gabungan Dewan Komisaris dan Direksi guna membahas dan mengevaluasi perkembangan laporan kinerja Direksi. • Melakukan pengawasan kegiatan pada bidang-bidang: › *Good Corporate Governance.* › *Compliance, System Procedure & Coordinator Customer Protection.* › *Risk Management.* › *SKAI & ICOFR.* › *Anti-Fraud.* › *Anti-Money Laundering, Counter Terrorist Financing & Weapon Mess Destruction.* • Melakukan pengawasan kegiatan bidang Internal Audit. • Memberikan tugas lain kepada anggota Dewan Komisaris. • Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya. • Mengambil alih tugas Komisaris lainnya apabila yang bersangkutan berhalangan. • Memimpin rapat gabungan antara Direksi dan Dewan Komisaris.	• Coordinating and providing direction to the Board of Commissioners' members. • Coordinating the supervision carried out by the Board of Commissioners' members according to their respective fields. • Organizing and leading: › Board of Commissioners internal meeting. › Joint meetings of the Board of Commissioners and Board of Directors to discuss and evaluate the progress of the Board of Directors' performance reports. • Supervising activities in the following areas: › Good Corporate Governance. › Compliance, System Procedure & Coordinator Customer Protection. › Risk Management. › SKAI & ICOFR. › Anti-Fraud. › Anti-Money Laundering, Counter Terrorist Financing & Weapon Mess Destruction. • Supervising activities in Internal Audit areas. • Giving other duties to the Board of Commissioners' members. • Creating a draft of memorandum to the Board of Directors relating to the field supervision and development. • Taking over the duties of other Commissioners in the event the person concerned is absent. • Leading joint meetings between the Board of Directors and Board of Commissioners.
Gunawan Tenggarahardja Komisaris Independen Independent Commissioner	• Melakukan pengawasan kegiatan bidang-bidang: › *Information Technology.* › *Operations.* › *Human Capital Management & General Affair.* › *Corporate Legal.* › *Credit Legal.* › *Change Management Office.* › *Marketing Communication, Brand & Product Division.* • Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya. • Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya. • Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya. • Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan.	• Supervising activities in the following areas: › Information Technology. › Operations. › Human Capital Management & General Affair. › Corporate Legal. › Credit Legal. › Change Management Office. › Marketing Communication, Brand & Product Division. • Discussing issues in the areas under their supervision. • Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision. • Creating a draft of memorandum to the Board of Directors relating to the field supervision and development. • Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot attend the meeting.

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Sia Leng Ho Komisaris Commissioner	• Melakukan pengawasan kegiatan bidang-bidang: › *Commercial Banking.* › *SME & Consumer Banking.* › *Branch Banking Network.* › *Finance & Accounting.* › *Loan & Trade Operations.* › *Treasury.* › *International Banking.* › *Credit Monitoring & Collection.* › *Credit Risk Review.* › *Special Asset Management.* • Membahas permasalahan-permasalahan bidang yang berada di bawah pengawasannya. • Membantu mempersiapkan penyusunan laporan bagi Otoritas Jasa Keuangan pada setiap akhir semester, khususnya mengenai bidang-bidang yang berada di bawah pengawasannya. • Membuat konsep memorandum kepada Direksi berkaitan dengan pengawasan dan pembinaan bidangnya. • Mewakili tugas Komisaris Utama dan Komisaris lainnya, apabila yang bersangkutan berhalangan.	• Supervising activities in the following areas: › Commercial Banking. › SME & Consumer Banking. › Branch Banking Network. › Finance & Accounting. › Loan & Trade Operations. › Treasury. › International Banking. › Credit Monitoring & Collection. › Credit Risk Review. › Special Asset Management. • Discussing issues in the areas under their supervision. • Assisting the preparation of reports for the Financial Services Authority at the end of each semester, particularly regarding the fields under their supervision. • Creating a draft of memorandum to the Board of Directors relating to the field supervision and development. • Representing the duties of the President Commissioner and other Commissioners, in the event the person concerned cannot attend the meeting.

Wewenang Dewan Komisaris

Dewan Komisaris memiliki wewenang tertentu dalam melaksanakan fungsi pengawasan serta tanggung jawabnya, yang diuraikan sebagai berikut:

1. Dewan Komisaris dengan suara terbanyak setiap waktu berhak memberhentikan untuk sementara waktu seorang atau lebih anggota Direksi, jika bertindak bertentangan dengan Anggaran Dasar serta peraturan lainnya atau melalaikan kewajibannya atau terdapat alasan yang mendesak bagi Bank, termasuk dalam hal Direksi sakit dan tidak dapat menjalankan tugas. Dalam jangka waktu paling lambat 30 (tiga puluh) hari setelah tanggal pemberhentian sementara harus diselenggarakan RUPS.
2. Dalam hal jabatan salah seorang anggota Direksi kosong, baik mengundurkan diri maupun diberhentikan dan penggantinya belum ada atau belum memangku jabatannya, maka Dewan Komisaris berwenang menunjuk salah seorang anggota Direksi untuk menjalankan pekerjaan anggota Direksi lainnya yang kosong tersebut dengan kekuasaan dan wewenang yang sama dan Direktur tersebut dapat bertindak untuk dan atas nama Direksi serta menunjuk pihak lain untuk mewakili Bank dalam hal terjadi benturan kepentingan Bank dengan kepentingan semua anggota Direksi.
3. Menetapkan komposisi Direksi berdasarkan kewenangan yang dilimpahkan oleh RUPS.
4. Mendapatkan informasi dari Direksi Entitas Anak terkait dengan kondisi Entitas Anak.
5. Menyetujui atau menolak secara tertulis tindakan-tindakan yang dilakukan Direksi, seperti yang tercantum dalam *BOC Charter*.

Authority of the Board of Commissioners

The Board of Commissioners has specific authority in performing its supervisory functions and responsibilities, outlined as follows:

1. The Board of Commissioners with the most vote, at all times, has the rights to suspend one or more members of the Board of Directors, if acting on the contrary to the Articles of Association and other regulations or neglecting the obligations or there is an urgent reason for the Bank, including in the case of the Board of Directors being sick and unable to perform the duties. Within the period of no more than 30 (thirty) days after the suspension date, a GMS must be held.
2. In the event that one position of Board of Directors is vacant, either due to resignation or dismissal, and no successor available or has assumed the position, the Board of Commissioners is authorized to appoint a member of the Board of Directors to carry out the work of the other vacant position of the Board of Directors with equal power and authority, and this Director may act for and on behalf of the Board of Directors and appoint other party to represent the Bank in the event of a conflict of interest of the Bank with the interest of all members of the Board of Directors.
3. Determining the composition of the Board of Directors based on the authority delegated by the GMS.
4. Obtaining information from the Board of Directors of a Subsidiary related to the Subsidiary condition.
5. Approving or rejecting in writing the actions of the Board of Directors as stated in the BOC Charter.

Jumlah, Komposisi, dan Independensi Dewan Komisaris

Jumlah dan Komposisi

Dewan Komisaris Bank terdiri dari sekurang-kurangnya 3 (tiga) orang anggota, termasuk Komisaris Independen. Jumlah anggota Dewan Komisaris paling banyak sama dengan jumlah anggota Direksi. Masa jabatan ditetapkan melalui keputusan RUPS untuk periode 3 (tiga) tahun, dengan memperhatikan ketentuan peraturan perundang-undangan dan Anggaran Dasar.

Pada tahun 2025, komposisi Dewan Komisaris Bank yang diangkat berdasarkan Keputusan RUPS Tahunan tanggal 20 Juni 2025 untuk masa jabatan 2025-2028 sebagai berikut:

Komisaris Utama Independen : Zaenal Abidin Ph.D
Komisaris Independen : Gunawan Tenggarahardja

Komisaris : Sia Leng Ho

Independensi

Dewan Komisaris senantiasa menjunjung tinggi prinsip independensi dalam menjalankan tugas dan tanggung jawabnya. Hal ini dilakukan untuk memastikan setiap keputusan bebas dari benturan kepentingan serta melindungi kepentingan Bank dan seluruh pemangku kepentingan.

Penilaian Kemampuan dan Kepatutan Dewan Komisaris

Sepanjang tahun 2025, Bank memastikan bahwa seluruh anggota Dewan Komisaris telah memenuhi persyaratan regulator dengan lulus uji kemampuan dan kepatutan sesuai Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016. Hal ini mencerminkan komitmen Bank dalam menjaga tata kelola yang baik serta memastikan bahwa setiap anggota Dewan Komisaris memiliki integritas, kompetensi, dan profesionalisme yang dibutuhkan. Informasi lebih lanjut mengenai hasil penilaian tersebut dapat dilihat pada profil masing-masing anggota di Bab Profil Perusahaan.

Komisaris Independen

Mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, komposisi Dewan Komisaris wajib terdiri dari paling sedikit 50% Komisaris Independen. Pada tahun 2025, Bank telah memenuhi ketentuan tersebut dengan memiliki 2 (dua) Komisaris Independen atau sebesar 66,67% dari

Number, Composition, and Independence of the Board of Commissioners

Number and Composition

The Bank's Board of Commissioners shall consist of at least 3 (three) members, including Independent Commissioner. The number of members of the Board of Commissioners shall be at most the same as the number of members of the Board of Directors. The term of office shall be determined by GMS resolution for a period of 3 (three) years, by considering the laws and regulations and Articles of Association.

In 2025, the composition of the Bank's Board of Commissioners, appointed based on the Resolution of Annual GMS dated 20 June 2025, for the 2025-2028 term of office, is as follows:

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

Independence

The Board of Commissioners always upholds the principle of independence in performing its duties and responsibilities. This is carried out to ensure that every decision is free from any conflicts of interest and to protect the interests of the Bank and all stakeholders.

Fit and Proper Test for the Board of Commissioners

Throughout 2025, the Bank ensured that all members of the Board of Commissioners met regulatory requirements by passing the fit and proper test in accordance with Financial Services Authority Regulation No. 27/POJK.03/2016. This matter reflects the Bank's commitment to maintaining good governance and ensuring that each member of the Board of Commissioners has the required integrity, competency, and professionalism. Further information regarding the results of these assessments can be seen in the profile of each member in the Company Profile chapter.

Independent Commissioner

Referring to the Financial Services Authority Regulation No. 17 of 2023 on Governance Implementation for Commercial Banks, the composition of the Board of Commissioners shall consist of at least 50% Independent Commissioners. In 2025, the Bank complied with these requirements by having 2 (two)

total 3 (tiga) anggota Dewan Komisaris. Seluruh Komisaris Independen dimaksud telah memenuhi persyaratan yang ditetapkan oleh regulator sebagai berikut:

1. Bukan merupakan orang yang bekerja atau mempunyai wewenang dan tanggung jawab untuk merencanakan, memimpin, mengendalikan, atau mengawasi kegiatan Bank dalam waktu 6 (enam) bulan terakhir, kecuali untuk pengangkatan kembali sebagai Komisaris Independen Bank pada periode berikutnya.
2. Tidak mempunyai saham baik langsung maupun tidak langsung pada Bank.
3. Tidak mempunyai hubungan afiliasi dengan Bank, anggota Dewan Komisaris, anggota Direksi atau Pemegang Saham Utama Bank.
4. Tidak mempunyai hubungan usaha baik langsung maupun tidak langsung yang berkaitan dengan kegiatan usaha Bank tersebut.

Pernyataan Independensi

Seluruh Komisaris Independen Bank telah menandatangani Surat Pernyataan Independensi serta lulus uji kemampuan dan kepatutan sesuai ketentuan yang ditetapkan oleh Otoritas Jasa Keuangan.

Rapat Dewan Komisaris

Kebijakan Rapat Dewan Komisaris

Dewan Komisaris menyelenggarakan rapat secara berkala paling sedikit sekali dalam 2 (dua) bulan, dengan kehadiran fisik seluruh anggota Dewan Komisaris paling sedikit 2 (dua) kali dalam setahun, yang diprioritaskan untuk evaluasi dan penetapan kebijakan strategis serta evaluasi RBB, serta menyelenggarakan rapat bersama Direksi paling sedikit sekali dalam 4 (empat) bulan.

Rapat dapat dilaksanakan secara fisik maupun melalui sarana teknologi telekonferensi sesuai ketentuan internal Bank dan dinyatakan sah apabila dihadiri oleh lebih dari setengah jumlah anggota, baik secara langsung maupun melalui sarana teknologi informasi. Keputusan rapat diambil berdasarkan musyawarah mufakat atau suara terbanyak apabila tidak tercapai mufakat, dan seluruh hasil rapat dituangkan dalam risalah rapat yang ditandatangani oleh pimpinan rapat serta didistribusikan kepada seluruh anggota Dewan Komisaris, termasuk pencatatan perbedaan pendapat apabila ada. Dalam hal rapat diselenggarakan melalui sarana teknologi telekonferensi, pelaksanaan rapat dilengkapi dengan dasar keputusan penyelenggaraan, bukti rekaman yang ditatausahakan sesuai ketentuan, serta risalah rapat yang ditandatangani oleh seluruh peserta rapat dan didistribusikan secara langsung atau elektronik.

Independent Commissioners, or 66.67% of the total 3 (three) members of the Board of Commissioners. All such Independent Commissioners have met the following regulatory requirements:

1. Not being employed nor having the authority and responsibility to plan, lead, control, or supervise the Bank's activities within the last 6 (six) months, except for reappointment as the Bank's Independent Commissioner in the next period.
2. Not possessing any shares in the Bank, either directly or indirectly.
3. Not having affiliation relationship with the Bank, members of Board of Commissioners, members of Board of Directors, or the Bank's Main Shareholders.
4. Not having business relationship, either directly or indirectly, that are related to the Bank's business activities.

Statement of Independency

All Independent Commissioners of the Bank have signed a Statement of Independence and passed the fit and proper test in accordance with the provisions stipulated by Financial Services Authority.

Board of Commissioners' Meetings

Board of Commissioners' Meeting Policy

The Board of Commissioners holds regular meetings at least once every 2 (two) months, with all members of the Board of Commissioners present in person at least twice a year, prioritized to evaluate and determine strategic policies and evaluate RBB, and holds joint meetings with the Board of Directors at least once every 4 (four) months.

Meetings can be held in person or via teleconference technology in accordance with the Bank's internal regulations and are deemed valid if attended by more than half of the members, either in person or through information technology. Meeting decisions are made by consensus or by majority vote in the event consensus is not reached. All meeting results are recorded in the minutes of meeting, signed by the meeting chair and distributed to all members of the Board of Commissioners, including any dissenting opinions. In the event a meeting is held via teleconference technology, the meeting shall be conducted based on decision to hold the meeting, recorded evidence administered in accordance with regulations, and minutes of the meeting signed by all meeting participants and distributed either directly or electronically.

Frekuensi Kehadiran Rapat Dewan Komisaris [G-02]

Rekapitulasi kehadiran masing-masing Dewan Komisaris dalam rapat di tahun 2025 sebagai berikut:

Board of Commissioners' Frequency of Attendance in Meetings [G-02]

The summary of attendance of each member of the Board of Commissioners at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Rapat Internal Dewan Komisaris Board of Commissioners Internal Meeting			Rapat Gabungan dengan Direksi Joint Meeting with Board of Directors		
		Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Komisaris Utama Independen Independent President Commissioner	6	6	100.00	6	6	100.00
Gunawan Tenggarahardja	Komisaris Independen Independent Commissioner	6	6	100.00	6	4	66.67
Sia Leng Ho	Komisaris Commissioner	6	6	100.00	6	6	100.00
Rata-Rata Kehadiran (%) Average Attendance (%)				**100.00**			**88.89**

Kehadiran Dewan Komisaris dalam RUPS tercantum pada bagian yang membahas Rapat Umum Pemegang Saham.

The attendance of the Board of Commissioners at GMS is stated in the section that discusses General Meeting of Shareholders.

Agenda Rapat Internal Dewan Komisaris

Rapat internal Dewan Komisaris membahas berbagai agenda, antara lain:

1. Laporan Direktur Kepatuhan Periode Semester II Tahun 2024.
2. Laporan Tingkat Kesehatan Bank Periode Semester II Tahun 2024.
3. Laporan Keuangan dan Pengendalian Internal Triwulan IV Tahun 2024.
4. Masa tugas anggota Komite Audit.
5. Perubahan anggota Komite Audit dan Komite Pemantau Risiko.
6. *Roadmap* Digital Bank Victoria.
7. Rencana kerja Dewan Komisaris tahun 2026.

Agenda of Board of Commissioners' Internal Meeting

The Board of Commissioners' Internal meeting discusses various agenda items, including:

1. Compliance Director's Report for Semester II of 2024.
2. Bank Sound Level Report for Semester II of 2024.
3. Financial Statements and Internal Control Report for Quarter IV of 2024.
4. Term of office of Audit Committee members.
5. Changes to Audit Committee and Risk Monitoring Committee members.
6. Bank Victoria Digital Roadmap.
7. Board of Commissioners' work plan for 2026.

Agenda Rapat Gabungan dengan Direksi

Rapat gabungan Dewan Komisaris dan Direksi membahas berbagai agenda, antara lain:

1. Kinerja Bank Victoria periode 31 Desember 2024 dan proyeksi Januari 2025.
2. Kinerja Bank Victoria periode 31 Maret 2025.
3. Kinerja Bank Victoria periode 30 Juni 2025 (proyeksi).
4. Kinerja Bank Victoria periode 31 Agustus 2025 dan proyeksi periode 30 September 2025.
5. Kinerja Bank Victoria periode 31 Oktober 2025 dan proyeksi periode 30 November 2025.

Agenda of Joint Meeting with Board of Directors

Joint meeting of the Board of Commissioners and Board of Directors discusses various agenda items, including:

1. Bank Victoria's performance as of 31 December 2024 and projections for January 2025.
2. Bank Victoria's performance as of 31 March 2025.
3. Bank Victoria's performance as of 30 June 2025 (projections).
4. Bank Victoria's performance as of 31 August 2025 and projections for 30 September 2025.
5. Bank Victoria's performance as of 31 October 2025 and projections for 30 November 2025.

6. RBB 2026-2028.
7. Kinerja Bank Victoria periode 30 November 2025 dan proyeksi 31 Desember 2025.

Persetujuan dan Rekomendasi Dewan Komisaris

Mengacu pada Peraturan Otoritas Jasa Keuangan No. 55/POJK.03/2016 serta No. 17 Tahun 2023, keputusan-keputusan yang memerlukan persetujuan Dewan Komisaris ditetapkan sebagai berikut:

1. Dewan Komisaris dilarang untuk ikut serta dalam pengambilan keputusan untuk kegiatan operasional Bank, kecuali:
   a. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan mengenai batas maksimum pemberian kredit bank umum.
   b. Hal-hal lain yang ditetapkan dalam Anggaran Dasar Bank atau peraturan perundang-undangan yang berlaku.
2. Pengambilan keputusan kegiatan operasional Bank oleh Dewan Komisaris sebagaimana dimaksud di atas merupakan bagian dari tugas pengawasan oleh Dewan Komisaris sehingga tidak meniadakan tanggung jawab Direksi atas pelaksanaan kepengurusan Bank.

Sepanjang tahun 2025, Dewan Komisaris memberikan 17 (tujuh belas) persetujuan dan rekomendasi yang mencakup berbagai aspek strategis dalam pengelolaan Bank. Beberapa di antaranya meliputi arahan hasil penelaahan terhadap Laporan Keuangan Tahunan dan pengendalian internal, pembagian tugas serta wewenang anggota Direksi, serta hasil evaluasi terhadap Laporan Tingkat Kesehatan Bank. Selain itu, Dewan Komisaris juga memberikan arahan terkait hasil penelaahan Laporan Direktur Kepatuhan dan Manajemen Risiko, Laporan Hasil Pemeriksaan SKAI, serta Laporan Profil Risiko.

Sertifikasi Manajemen Risiko Dewan Komisaris

Sebagai wujud komitmen terhadap peningkatan kualitas tata kelola, seluruh anggota Dewan Komisaris Bank pada tahun 2025 telah menyelesaikan sertifikasi manajemen risiko. Pencapaian ini mencerminkan kepatuhan terhadap regulasi yang berlaku sekaligus memperkuat kompetensi Dewan Komisaris dalam menjalankan fungsi pengawasan. Detail mengenai sertifikasi masing-masing anggota dapat ditemukan pada bab Profil Perusahaan.

6. RBB 2026-2028.
7. Bank Victoria's performance as of 30 November 2025 and projections for 31 December 2025.

Board of Commissioners' Approvals and Recommendations

Referring to the Financial Services Authority Regulation No. 55/POJK.03/2016 and No. 17 of 2023, decisions requiring the approval of the Board of Commissioners are determined as follows:

1. The Board of Commissioners is prohibited from taking part in decision making for the Bank's operational activities, unless:
   a. Provision of fund to related party as stipulated in the provisions regarding legal lending limit for commercial bank.
   b. Other matters specified in the Bank's Articles of Association or in the applicable laws and regulations.
2. Decision making on Bank operational activities by the Board of Commissioners as referred to in the above is part of the supervisory function of the Board of Commissioners and does not negate the Board of Directors' responsibility for the implementation of Bank management.

Throughout 2025, the Board of Commissioners issued 17 (seventeen) approvals and recommendations covering various strategic aspects in the management of the Bank. Some of these included directives on the review results of Annual Financial Statements and internal control, division of duties and authorities of Board of Directors' members, and evaluation results of the Bank's Sound Level Report. In addition, the Board of Commissioners also provided directives related to the review results of Compliance and Risk Management Director's Report, SKAI Audit Result Report, and Risk Profile Report.

Board of Commissioners' Risk Management Certification

As the manifestation of its commitment to improving the quality of governance, all members of the Bank's Board of Commissioners completed risk management certification in 2025. This achievement reflects compliance with applicable regulations and strengthens the Board of Commissioners' competence in performing its supervisory function. Details regarding each member's certification can be found in the Company Profile chapter.

Direksi
Board of Directors

Direksi merupakan organ Bank yang bertanggung jawab penuh atas pengelolaan dan mewakili Bank sesuai Anggaran Dasar serta peraturan yang berlaku. Direksi berwenang mengarahkan operasional, menetapkan kebijakan, dan mengambil langkah strategis guna memastikan efisiensi dan efektivitas kinerja Bank.

The Board of Directors is the Bank's organ fully responsible for managing and representing the Bank in accordance with the Articles of Association and applicable regulations. The Board of Directors has the authority to direct operations, determine policies, and take strategic steps to ensure the efficiency and effectiveness of the Bank's performance.

Pedoman Direksi

Dalam melaksanakan tugasnya, Direksi memiliki pedoman dan tata tertib kerja yang dikenal sebagai *Board of Directors Charter (BOD Charter)*, yang telah diperbarui dan disahkan melalui Keputusan Direksi No. 006A/SK-DIR/12/23 tanggal 6 Desember 2023.

Board of Directors Charter

In performing its duties, the Board of Directors has charter and work guidelines known as Board of Directors Charter (BOD Charter), updated and ratified through the Board of Directors' Decision No. 006A/SK-DIR/12/23 dated 6 December 2023.

Ruang Lingkup Pekerjaan dan Tanggung Jawab Masing-Masing Anggota Direksi

Berdasarkan Keputusan No. 002/SK-KOM/08/25 tanggal 6 Agustus 2025 tentang Pembagian Tugas dan Wewenang Anggota *Board of Directors*, ruang lingkup tugas dan tanggung jawab masing-masing anggota Direksi sebagai berikut:

Scope of Work and Responsibilities of Each Member of the Board of Directors

Based on the Decision No. 002/SK-KOM/08/25 dated 6 August 2025 on the Division of Duties and Authorities of the Board of Directors' Members, the scope of duties and responsibilities of each member of the Board of Directors is as follows:

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Achmad Friscantono Direktur Utama President Director	Koordinasi pengelolaan Bank Victoria yang membawahi Divisi: • *SEVP of Change Management Office.* • *Change Management Office Division.* • *SKAI Division.* • *Treasury Division.* • *Information Technology Division.* • *Corporate Legal Division.*	Coordination of Bank Victoria management which oversees the Divisions of: • SEVP of Change Management Office. • Change Management Office Division. • SKAI Division. • Treasury Division. • Information Technology Division. • Corporate Legal Division.
Rusli Wakil Direktur Utama Deputy President Director	Wakil Direktur Utama yang membawahi Divisi/ Departemen: • *SEVP of Operations & International Banking.* • *Operations & Internal Control Division.* • *International Banking Division.* • *Special Asset Management Division.* • *Credit Risk Review Division.* • *HCM & General Affair Division.* • *Credit Monitoring & Collection.*	Deputy President Director in charge of Divisions/ Department of: • SEVP of Operations & International Banking. • Operations & Internal Control Division. • International Banking Division. • Special Asset Management Division. • Credit Risk Review Division. • HCM & General Affair Division. • Credit Monitoring & Collection.
Lembing Direktur Bisnis Director of Business	Direktur Bisnis yang membawahi Divisi: • *SEVP of Commercial.* • *Commercial Banking Division.* • *SEVP of SME.* • *SME & Consumer Banking Division.*	Director of Business in charge of Divisions of: • SEVP of Commercial. • Commercial Banking Division. • SEVP of SME. • SME & Consumer Banking Division.

Nama dan Jabatan Name and Position	Tugas dan Tanggung Jawab Duties and Responsibilities	
Debora Wahjutirto Tanoyo Direktur Keuangan Director of Finance	Direktur Keuangan yang membawahi Divisi/Departemen: • *SEVP of Finance, Accounting & Management Information System.* • *Accounting Division.* • *Management Information System (MIS).* • *Loan & Trade Operations Division.* • *Credit Legal Division.* • *Branch Banking Network Division.* • *Marketing Communication, Brand & Product Division.*	Director of Finance in charge of Divisions/Department of: • SEVP of Finance, Accounting & Management Information System. • Accounting Division. • Management Information System (MIS). • Loan & Trade Operations Division. • Credit Legal Division. • Branch Banking Network Division. • Marketing Communication, Brand & Product Division.
Tamunan Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	Direktur Kepatuhan dan Manajemen Risiko yang membawahi Divisi/Departemen: • *Compliance, System Procedure & Coordinator Customer Protection Division.* • *Risk Management Division.* • *Corporate Secretary Division.* • *Anti-Fraud & Internal Control Over Financial Reporting (ICOFR).* • *Anti-Money Laundering, Counter Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).*	Compliance and Risk Management Director in charge of Division/Department: • Compliance, System Procedure & Coordinator Customer Protection Division. • Risk Management Division. • Corporate Secretary Division. • Anti-*Fraud & Internal Control Over Financial Reporting (ICOFR).* • Anti-Money Laundering, Counter-Terrorist Financing & Weapon Mass Destruction (AML, CTF & WMD).

Wewenang Direksi

Dalam melaksanakan peran dan tanggung jawabnya, Direksi Bank memiliki sejumlah kewenangan yang menjadi pedoman utama dalam pengelolaan dan pengambilan keputusan, yaitu:

1. Mewakili Bank di dalam dan di luar pengadilan tentang segala hal dan dalam segala kejadian, mengikat Bank dengan pihak lain dan pihak lain dengan Bank, serta menjalankan segala tindakan, baik yang mengenai kepengurusan maupun kepemilikan, dengan pembatasan yang ditetapkan dalam Anggaran Dasar dan dengan memperhatikan peraturan perundang-undangan yang berlaku.
2. Untuk melakukan tindakan tertentu, Direksi terlebih dahulu harus mendapat persetujuan tertulis dari Dewan Komisaris kecuali ditentukan lain oleh peraturan dan ketentuan yang berlaku.
3. Memperoleh, mengalihkan, atau melepaskan dengan cara apapun hak-hak atas barang-barang tidak bergerak dan Bank.

Authority of the Board of Directors

In performing its roles and responsibilities, the Bank's Board of Directors has a number of authorities that serve as the primary guidelines for managing and making decision, namely:

1. Represent the Bank in and out of court on all matters and in any events, to bind the Bank to other parties and other parties to the Bank, and to carry out all actions, both on the management and ownership, with the limitations as stipulated in the Articles of Association with due regard to the applicable laws and regulations.
2. To perform certain actions, the Board of Directors must first obtain written approval from the Board of Commissioners, unless stipulated otherwise by the applicable rules and regulations.
3. To obtain, transfer, or waive by any means the rights to immovable property and the Bank.

Jumlah, Komposisi, dan Independensi Direksi

Jumlah dan Komposisi

Direksi Bank terdiri dari sekurang-kurangnya 3 (tiga) anggota, yaitu seorang Direktur Utama yang independen terhadap Pemegang Saham Pengendali serta minimal 2 (dua) Direktur lainnya. Apabila diperlukan, dapat diangkat seorang Wakil Direktur Utama. Masa jabatan anggota Direksi adalah 3 (tiga) tahun sejak ditetapkan oleh RUPS hingga penutupan RUPS Tahunan ketiga, dengan tetap memperhatikan ketentuan peraturan perundang-undangan dan Anggaran Dasar.

Number, Composition, and Independence of the Board of Directors'

Number and Composition

The Bank's Board of Directors shall consist of at least 3 (three) members, comprising one President Director who is independent of the Controlling Shareholder and a minimum of 2 (two) other Directors. If necessary, one Deputy President Director may be appointed. The term of office of members of the Board of Directors is 3 (three) years from the date of their appointment by the GMS until the closing of the third Annual GMS, with due observance of compliance with laws and regulations and Articles of Association.

Pada tahun 2025, komposisi Direksi Bank yang diangkat berdasarkan Keputusan RUPS Tahunan tanggal 20 Juni 2025 untuk masa jabatan 2025-2028 sebagai berikut:

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

Independensi

Independensi Direksi merupakan prinsip penting untuk memastikan Direksi dapat bertindak objektif dan bebas dari benturan kepentingan maupun intervensi pihak lain. Untuk itu, anggota Direksi dilarang melakukan atau menerima tindakan yang dapat mengganggu kemandirian dalam pengelolaan Bank, termasuk menerima imbalan, fasilitas, maupun keuntungan pribadi dari pihak berkepentingan. Direksi juga wajib menolak setiap perintah atau permintaan dari Pemegang Saham atau pihak terafiliasi yang bertentangan dengan prinsip GCG, berpotensi merugikan, atau dapat mengurangi keuntungan Bank.

Penilaian Kemampuan dan Kepatutan Direksi

Sepanjang tahun 2025, Bank memastikan bahwa seluruh anggota Direksi telah memenuhi persyaratan regulator dengan lulus uji kemampuan dan kepatutan sesuai Peraturan Otoritas Jasa Keuangan No. 27/POJK.03/2016. Hal ini mencerminkan komitmen Bank dalam menjaga tata kelola yang baik serta memastikan bahwa setiap anggota Direksi memiliki integritas, kompetensi, dan profesionalisme yang dibutuhkan. Informasi lebih lanjut mengenai hasil penilaian tersebut dapat dilihat pada profil masing-masing anggota di Bab Profil Perusahaan.

Rapat Direksi

Kebijakan Rapat Direksi

Direksi wajib mengadakan rapat baik secara *online* maupun *offline* sekurang-kurangnya sekali dalam sebulan serta rapat bersama Dewan Komisaris setiap 4 (empat) bulan. Rapat sah apabila dihadiri mayoritas anggota Direksi dan keputusan diambil berdasarkan musyawarah mufakat atau suara terbanyak. Risalah rapat wajib dibuat, ditandatangani peserta, memuat perbedaan pendapat bila ada, serta disimpan sesuai ketentuan perundang-undangan sebagai bukti sah keputusan Direksi. Hasil rapat didokumentasikan secara tertulis dengan memuat paling sedikit agenda pembahasan, daftar hadir, dan keputusan/hasil pembahasan.

In 2025, the composition of the Bank's Board of Directors, appointed based on the Resolution of Annual GMS dated 20 June 2025, for the 2025-2028 term of office, is as follows:

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

Independence

The independence of the Board of Directors is a crucial principle to ensure that the Board of Directors can act objectively and are free from any conflicts of interest or interference from other parties. Therefore, members of the Board of Directors are prohibited from taking or accepting actions that could compromise the independence of the Bank's management, including accepting rewards, facilities, or personal benefits from interested parties. The Board of Directors shall also reject any orders or requests from Shareholders or affiliated parties that are contrary to GCG principles, potentially harmful, or could reduce the Bank's profits.

Fit and Proper Test for the Board of Directors

Throughout 2025, the Bank ensured that all members of the Board of Directors met regulatory requirements by passing the fit and proper test in accordance with Financial Services Authority Regulation No. 27/POJK.03/2016. This matter reflects the Bank's commitment to maintaining good governance and ensuring that each member of the Board of Directors has the required integrity, competency, and professionalism. Further information regarding the results of these assessments can be seen in the profile of each member in the Company Profile chapter.

Board of Directors' Meetings

Board of Directors' Meeting Policy

The Board of Directors shall hold meetings, both online and offline, at least once a month, and joint meetings with the Board of Commissioners every 4 (four) months. A meeting is valid if attended by a majority of Board of Directors' members, and decisions are made by consensus or majority vote. Minutes of meetings shall be prepared, signed by participants, including any dissenting opinions, and kept in accordance with laws and regulations as valid evidence of the Board of Directors' decisions. Meeting results are documented in writing, including at least the discussion agenda, attendance list, and decisions/outcomes.

Frekuensi Kehadiran Rapat Direksi [G-02]

Rekapitulasi kehadiran masing-masing Direksi dalam rapat di tahun 2025 sebagai berikut:

Board of Directors' Frequency of Attendance in Meetings [G-02]

The summary of attendance of each member of the Board of Directors at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Rapat Internal Direksi Board of Directors Internal Meeting			Rapat Gabungan dengan Dewan Komisaris Joint Meeting with Board of Commissioners		
		Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Achmad Friscantono	Direktur Utama President Director	49	45	91.84	6	6	100.00
Rusli	Wakil Direktur Utama Deputy President Director	49	46	93.88	6	6	100.00
Lembing	Direktur Director	49	42	85.71	6	6	100.00
Debora Wahjutirto Tanoyo	Direktur Director	49	44	89.80	6	6	100.00
Tamunan	Direktur Kepatuhan dan Manajemen Risiko Director of Compliance and Risk Management	49	48	97.96	6	6	100.00
Rata-Rata Kehadiran (%) **Average Attendance (%)**				**91.84**			**100.00**

Kehadiran Direksi dalam RUPS tercantum pada bagian yang membahas Rapat Umum Pemegang Saham.

The attendance of the Board of Directors at GMS is stated in the section that discusses General Meeting of Shareholders.

Agenda Rapat Internal Direksi

Agenda yang dibahas dalam rapat internal Direksi meliputi kinerja kredit, *pipeline* dan realisasi Agunan Yang Diambil Alih (AYDA) serta *Write-Off* (WO), kinerja keuangan, serta pembahasan lain-lain.

Agenda of Board of Directors' Internal Meeting

The agenda discussed in the Board of Directors' internal meeting includes credit performance, pipeline and realization of Foreclosed Collateral (AYDA) and Write-Off (WO), financial performance, and other discussions.

Agenda Rapat Gabungan dengan Dewan Komisaris

Agenda yang dibahas dalam rapat gabungan Direksi dengan Dewan Komisaris telah disampaikan pada bagian Rapat Dewan Komisaris.

Agenda of Joint Meeting with Board of Commissioners

The agenda discussed in the joint meetings of Board of Directors and Board of Commissioners has been submitted to the Board of Commissioners' Meeting section.

Persetujuan dan Rekomendasi Direksi

Board of Directors' Approvals and Recommendations

Sepanjang tahun 2025, Direksi aktif menjalankan fungsi pengambilan keputusan strategis dengan mengeluarkan 198 persetujuan dan rekomendasi yang mendukung penguatan tata kelola Bank. Beberapa di antaranya terkait dengan kebijakan manajemen risiko, kebijakan perkreditan,

Throughout 2025, the Board of Directors actively carried out its strategic decision-making function by issuing 198 approvals and recommendations that supported the strengthening of the Bank's governance. Some of them were related to risk management policies, credit policies,

kebijakan tata kelola perusahaan, sistem keamanan informasi, kebijakan kepatuhan, strategi anti-*fraud*, serta berbagai standar operasional prosedur yang mendukung operasional perbankan, layanan digital, dan produk perbankan.

corporate governance policies, information security system, compliance policies, anti-fraud strategy, and various standard operating procedures that supported banking operations, digital services, and banking products.

Sertifikasi Manajemen Risiko Direksi

Seluruh anggota Direksi pada tahun 2025 telah memenuhi kewajiban kepemilikan sertifikasi manajemen risiko sesuai Peraturan Otoritas Jasa Keuangan No. 24 Tahun 2022 tentang Pengembangan Kualitas Sumber Daya Manusia Bank Umum. Kepatuhan ini mencerminkan komitmen Bank dalam memperkuat kompetensi dan profesionalisme pengurus, yang informasinya tercantum pada bagian Profil Perusahaan.

Board of Directors' Risk Management Certification

All members of the Board of Directors in 2025 met the requirements to hold risk management certification as per Financial Services Authority Regulation No. 24 of 2022 on Human Resources Quality Development for Commercial Banks. This compliance reflects the Bank's commitment to strengthening its management competency and professionalism, information about which is listed in the Company Profile section.

Rangkap Jabatan Dewan Komisaris dan Direksi

Concurrent Positions of the Board of Commissioners and Board of Directors

Bank menetapkan aturan mengenai larangan rangkap jabatan bagi Dewan Komisaris dan Direksi dengan berpedoman pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola Bank Umum, yang diuraikan sebagai berikut:

1. Dewan Komisaris merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada lembaga keuangan atau perusahaan keuangan baik bank maupun bukan bank.
2. Dewan Komisaris dilarang merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada lebih dari 1 (satu) lembaga atau perusahaan bukan keuangan, baik yang berkedudukan di dalam maupun di luar negeri.
3. Direksi merangkap jabatan sebagai anggota Dewan Komisaris, anggota Direksi, anggota Dewan Pengawas Syariah, atau Pejabat Eksekutif pada bank, perusahaan, dan/atau lembaga lain.
4. Dewan Komisaris dan Direksi merangkap jabatan pada bidang tugas fungsional pada lembaga keuangan bank dan/atau lembaga keuangan bukan bank yang berkedudukan di dalam maupun di luar negeri.

The Bank establishes rules on prohibition of concurrent positions for the Board of Commissioners and Board of Directors in accordance with Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, outlined as follows:

1. The Board of Commissioners holds concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers in financial institutions or financial companies, either banks and non-banks.
2. The Board of Commissioners is prohibited from holding concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers in more than 1 (one) non-financial institution or company, either domiciled within or outside the country.
3. The Board of Directors holds concurrent position as members of Board of Commissioners, members of Board of Directors, members of Sharia Supervisory Board, or Executive Officers at other banks, companies, and/or other institutions.
4. The Board of Commissioners and Board of Directors hold concurrent position in the field of functional duties at bank financial institutions and/or non-bank financial institutions domiciled within or outside the country.

5. Dewan Komisaris dan Direksi merangkap jabatan pada jabatan lain yang dapat menimbulkan benturan kepentingan dalam pelaksanaan tugas sebagai anggota Dewan Komisaris atau Direksi.

6. Dewan Komisaris dan Direksi merangkap jabatan pada jabatan lain sesuai dengan ketentuan peraturan perundang-undangan.
7. Komisaris Independen dilarang merangkap jabatan sebagai pejabat publik.

Tidak termasuk rangkap jabatan Dewan Komisaris dalam hal:
1. Dewan Komisaris menjabat sebagai anggota Direksi, anggota Dewan Komisaris, atau pejabat eksekutif yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak bukan Bank yang dikendalikan oleh Bank.
2. Komisaris Non-Independen menjalankan tugas fungsional dari Pemegang Saham Bank yang berbentuk badan hukum pada Bank dan/atau kelompok usaha Bank. dan/atau
3. Dewan Komisaris menduduki jabatan pada organisasi atau lembaga nirlaba, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Dewan Komisaris.

Sementara itu, termasuk rangkap jabatan dalam hal anggota Direksi:
1. Bertanggung jawab terhadap pengawasan atas penyertaan Bank pada Entitas Anak.
2. Menjalankan tugas fungsional menjadi anggota Dewan Komisaris pada Entitas Anak bukan Bank yang dikendalikan oleh Bank.
3. Bertanggung jawab terhadap pengawasan dana pensiun atau menjalankan tugas sebagai Dewan Pengawas dana pensiun, yang dimiliki oleh Bank.
4. Melaksanakan tugas sebagai Direktur pengganti.
5. Menduduki jabatan pada organisasi atau lembaga nirlaba, sepanjang tidak mengakibatkan yang bersangkutan mengabaikan pelaksanaan tugas dan tanggung jawab sebagai anggota Direksi.

Data mengenai rangkap jabatan Dewan Komisaris dan Direksi disajikan secara lengkap pada profil masing-masing anggota dalam bab Profil Perusahaan.

5. The Board of Commissioners and Board of Directors hold concurrent position in other positions that can cause conflicts of interest in performing their duties as members of Board of Commissioners or Board of Directors.
6. The Board of Commissioners and Board of Directors hold concurrent position in other positions in accordance with the provisions of the laws and regulations.
7. Independent Commissioners are prohibited from holding concurrent position as public officials.

Not including concurrent positions for the Board of Commissioners in the following cases:
1. The Board of Commissioners serves as member of Board of Directors, member of Board of Commissioners, or executive officer performing supervisory functions at 1 (one) Non-Bank Subsidiary controlled by the Bank.
2. Non-Independent Commissioner performing functional duties from the Bank's Shareholders in the form of legal entity at the Bank and/or the Bank's business group. and/or
3. The Board of Commissioners holds position in non-profit organization or institution, as long as it does not result in the person concerned neglecting the implementation of duties and responsibilities as a member of the Board of Commissioners.

Meanwhile, including concurrent positions for members of the Board of Directors in the following cases:
1. Responsible for supervising the Bank's investments in Subsidiaries.
2. Performing functional duties as member of Board of Commissioners in Non-Bank Subsidiary controlled by the Bank.
3. Responsible for supervising pension funds or carrying out duties as Supervisory Board for pension funds, owned by the Bank.
4. Carrying out duties as substitute Director.
5. Holding position in non-profit organization or institution, as long as it does not result in the person concerned neglecting the implementation of duties and responsibilities as a member of the Board of Directors.

Data on concurrent positions held by the Board of Commissioners and Board of Directors is presented completely in each member's profile in the Company Profile chapter.

Penilaian Kinerja Dewan Komisaris, Direksi, Komite Pendukung Dewan Komisaris, serta Komite dan Organ Pendukung Direksi [G-04]

Performance Assessment of the Board of Commissioners, Board of Directors, Board of Commissioners' Supporting Committees, and Board of Directors' Committees and Supporting Organs

Penilaian Kinerja Dewan Komisaris

Prosedur Pelaksanaan Penilaian Kinerja Dewan Komisaris

Proses evaluasi kinerja Dewan Komisaris di Bank Victoria dilaksanakan secara rutin setiap tahun sebagai bagian dari penerapan prinsip GCG. Evaluasi dilakukan dengan melibatkan Komite Remunerasi dan Nominasi melalui 2 (dua) metode, yaitu penilaian sendiri dan *peer evaluation*. Penilaian sendiri dilaksanakan oleh masing-masing anggota Dewan Komisaris dengan mengacu pada ketentuan dalam Peraturan Otoritas Jasa Keuangan mengenai Tata Kelola bagi Bank Umum. Sementara itu, *peer evaluation* dilakukan antar anggota Dewan Komisaris, di mana setiap anggota memberikan penilaian terhadap kinerja rekan-rekannya sesuai dengan bidang pengawasan dan tanggung jawab yang diemban. Selanjutnya, hasil dari proses evaluasi tersebut disampaikan oleh Komite Remunerasi dan Nominasi kepada Pemegang Saham sebelum pelaksanaan RUPS Tahunan, untuk dijadikan dasar dalam pengambilan keputusan terkait remunerasi serta dalam menilai efektivitas kinerja Dewan Komisaris.

Pihak yang Melakukan Penilaian Kinerja Dewan Komisaris

Pelaksanaan penilaian sendiri dikoordinasikan oleh Divisi *Compliance, System Procedure & Coordinator Customer Protection*, kemudian hasilnya disampaikan kepada Dewan Komisaris melalui Komite Remunerasi dan Nominasi. Adapun penilaian *peer evaluation* dilaksanakan secara langsung oleh setiap anggota Dewan Komisaris terhadap kinerja sesama anggota berdasarkan peran dan tanggung jawab masing-masing.

Kriteria Penilaian Kinerja Dewan Komisaris

Untuk penilaian sendiri, kriteria penilaian meliputi 20 (dua puluh) indikator *governance structure*, 23 (dua puluh tiga) indikator governance process, dan 6 (enam) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Board of Commissioners' Performance Asssessment

Procedures for the Board of Commissioners' Performance Assessment

The performance evaluation process for the Board of Commissioners at Bank Victoria is conducted routinely every year as part of GCG principles implementation. Evaluation is carried out by involving Remuneration and Nomination Committee through 2 (two) methods, namely self-assessment and peer evaluation. Self-assessment is conducted by each member of the Board of Commissioners in accordance with the provisions of Financial Services Authority Regulation on Governance for Commercial Banks. Meanwhile, peer evaluation is conducted among members of the Board of Commissioners, with each member assessing colleague performance according to respective supervision areas and responsibilities. The results of this evaluation process are then submitted by the Remuneration and Nomination Committee to Shareholders prior to the Annual GMS to serve as a basis for making decisions regarding remuneration and assessing the effectiveness of the Board of Commissioners' performance.

Party Assessing the Board of Commissioners' Performance

Self-assessment is coordinated by the Compliance, System Procedure & Coordinator Customer Protection Division, and the results are then submitted to the Board of Commissioners through Remuneration and Nomination Committee. Peer evaluations are conducted directly by each member of Board of Commissioners on fellow member performance based on respective roles and responsibilities.

Criteria for Assessing the Board of Commissioners' Performance

For self-assessment, its criteria include 20 (twenty) governance structure indicators, 23 (twenty three) governance process indicators, and 6 (six) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Sementara untuk *peer evaluation,* kriteria penilaian meliputi:

1. Kehadiran dalam rapat internal Dewan Komisaris, rapat gabungan Dewan Komisaris bersama Direksi, rapat Dewan Komisaris dengan Pemegang Saham, dan rapat Dewan Komisaris atau Komite dengan Unit Kerja Bank.
2. Integritas (misalnya benturan kepentingan yang muncul).
3. Pengetahuan dan pemahaman atas nilai-nilai misi, rencana jangka panjang Bank, dan refleksi pemahaman ini kepada isu-isu penting sepanjang tahun.
4. Kemampuan untuk menyampaikan, memberikan argumentasi, dan memberikan solusi mengenai isu-isu strategis Bank.
5. Kemampuan dalam mengikuti isu-isu dan tren yang berpengaruh terhadap Bank dan menggunakan informasi tersebut untuk menilai dan mengarahkan kinerja Bank, bukan hanya dari tahun ke tahun, akan tetapi juga dalam jangka panjang.
6. Hubungan anggota Dewan Komisaris dengan sesama anggota Dewan Komisaris lainnya, dengan Direksi, dan pihak-pihak lain yang diatur dalam Anggaran Dasar dan peraturan perundang-undangan.

Hasil Penilaian Kinerja Dewan Komisaris

Evaluasi kinerja Dewan Komisaris, baik secara kolektif maupun individual, merupakan instrumen penting dalam memastikan efektivitas pengawasan dan tata kelola Bank. Hasil evaluasi tersebut digunakan sebagai dasar dalam penetapan kompensasi dan insentif, sekaligus menjadi acuan bagi Pemegang Saham dalam memutuskan kelanjutan masa jabatan, pemberhentian, atau penunjukan kembali anggota Dewan Komisaris. Dengan demikian, proses penilaian tidak hanya berkaitan dengan aspek remunerasi, tetapi juga menentukan kesinambungan peran strategis Dewan Komisaris dalam kepemimpinan Bank.

Sebagai wujud transparansi dan akuntabilitas, hasil evaluasi kinerja Dewan Komisaris tahun 2025 disajikan sebagai berikut:

Meanwhile, for peer evaluation, the assessment criteria include:

1. Attendance at internal meetings of the Board of Commissioners, joint meetings of the Board of Commissioners and the Board of Directors, meetings between the Board of Commissioners and Shareholders, and meetings between the Board of Commissioners or Committee with the Bank's Work Units.
2. Integrity (for example conflicts of interest that arise).
3. Knowledge and understanding of the values of the mission, the Bank's long-term plan, and the reflection of this understanding on important issues throughout the year.
4. Ability to convey, provide arguments, and solutions regarding the Bank's strategic issues.
5. Ability to follow issues and trends that affect the Bank and use this information to assess and direct the Bank's performance, not only from year to year, but also in the long-term.
6. The relationship between member of the Board of Commissioners and fellow members of the Board of Commissioners, and the Board of Directors and other parties as regulated in the Articles of Association and laws and regulations.

The Board of Commissioners' Performance Assessment Results

Performance evaluation of the Board of Commissioners, both collectively and individually, is a crucial instrument in ensuring the effectiveness of the Bank's supervision and governance. The results of this evaluation are used as the basis for determining compensation and incentives, and also serve as a reference for Shareholders in deciding on the continuation of term of office, dismissal, or reappointment of members of Board of Commissioners. Therefore, the assessment process is not only related to remuneration but also determines the continuity of the Board of Commissioners' strategic role in the Bank's leadership.

As the manifestation of transparency and accountability, the results of the Board of Commissioners' performance evaluation in 2025 were presented as follows:

Penilaian Sendiri Self-Assessment	Peer Evaluation
PPada tahun 2025, hasil penilaian sendiri Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the Board of Commissioners' self-assessment results obtained a composite score of "2 (two)" under the category of "Good".	Pada tahun 2025, hasil penilaian peer evaluation pelaksanaan tugas Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the peer evaluation results of the implementation of Board of Commissioners' duties obtained a composite score of "2 (two)" under the category of "Good".

Penilaian Kinerja Direksi

Prosedur Pelaksanaan Penilaian Kinerja Direksi

Penilaian terhadap kinerja Direksi dilaksanakan secara berkala sebagai bagian dari upaya memastikan pencapaian target Bank. Evaluasi dilakukan sekurang-kurangnya sekali dalam setahun, baik pada tingkat individu maupun kolektif. Proses ini mencakup 2 (dua) mekanisme utama. Pertama, penilaian sendiri oleh Direksi sesuai dengan ketentuan Otoritas Jasa Keuangan mengenai penerapan tata kelola bank umum, yang menitikberatkan pada pelaksanaan tugas dan tanggung jawab. Kedua, penilaian oleh Dewan Komisaris, yang dilakukan melalui prosedur yang diuraikan sebagai berikut:

1. Direksi menyusun *Key Performance Indicator* (KPI) yang memuat rencana kerja, sasaran, atau target yang akan dicapai dalam 1 (satu) tahun maupun triwulan.
2. Penilaian kinerja Direksi dilaksanakan oleh Dewan Komisaris, namun Direktur Utama dapat menilai Direksi lainnya.
3. Direksi melaporkan realisasi pencapaian target masing-masing KPI dalam laporan triwulan dan Laporan Tahunan kepada Dewan Komisaris, baik secara individu maupun kolektif untuk dievaluasi.
4. Hasil evaluasi KPI Direksi oleh Dewan Komisaris menjadi bahan penilaian pertanggungjawaban Direksi dalam pelaksanaan RUPS.

Pihak yang Melakukan Penilaian Kinerja Direksi

Pelaksanaan penilaian kinerja Direksi dilakukan melalui mekanisme yang terstruktur. Untuk penilaian sendiri, proses koordinasi berada di bawah Divisi *Compliance, System Procedure & Coordinator Customer Protection*, dengan hasil evaluasi yang kemudian disampaikan kepada Direksi serta Dewan Komisaris. Adapun penilaian oleh Dewan Komisaris penilaian dilakukan oleh Dewan Komisaris sebagai bentuk pengawasan dan akuntabilitas atas kinerja Direksi sepanjang periode berjalan.

Kriteria Penilaian Kinerja Direksi

Untuk penilaian sendiri, kriteria penilaian meliputi 17 (tujuh belas) indikator *governance structure*, 24 (dua puluh empat) indikator *governance process*, dan 12 (dua belas) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Board of Directors' Performance Asssessment

Procedures for the Board of Directors' Performance Assessment

Assessment on the Board of Directors' performance is conducted periodically as an effort to ensure the achievement of the Bank's targets. Evaluations are conducted at least once a year, both at individual and collective levels. This process involves 2 (two) main mechanisms. First, self-assessment by the Board of Directors is in accordance with Financial Services Authority regulations on governance implementation for commercial banks, which emphasizes the implementation of duties and responsibilities. Second, assessment by the Board of Commissioners, conducted through the procedures outlined as follows:

1. The Board of Directors prepares Key Performance Indicator (KPI) that includes work plan, objectives, or goals to be achieved within 1 (one) year and quarterly.
2. The Board of Directors' performance is assessed by the Board of Commissioners, but the President Director can assess other Directors.
3. The Board of Directors reports the realization of target achievement for each KPI in the quarterly report and Annual Report to the Board of Commissioners, whether individually or collectively, to be evaluated.
4. The evaluation result of Board of Directors' KPI by the Board of Commissioners becomes means in assessing the Board of Directors' accountability in the GMS.

Party Assessing the Board of Directors' Performance

The Board of Directors' performance assessment is carried out through a structured mechanism. For self-assessment, coordination process is under the Compliance, System Procedure & Coordinator Customer Protection Division, with the evaluation results then submitted to the Board of Directors and Board of Commissioners. Meanwhile, assessment by Board of Commissioners is conducted by the Board of Commissioners as a form of supervision and accountability for the Board of Directors' performance throughout the current period.

Criteria for Assessing the Board of Directors' Performance

For self-assessment, its criteria include 17 (seventeen) governance structure indicators, 24 (twenty four) governance process indicators, and 12 (twelve) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Sementara untuk penilaian oleh Dewan Komisaris, kriteria penilaian meliputi:

1. Terlaksananya kepemimpinan (*leadership*), kerja sama (*team work*), serta komunikasi dan kompetensi yang baik.
2. Terlaksananya GCG dalam setiap kegiatan usaha Bank.
3. Terlaksananya pencapaian RBB.
4. Terlaksananya pengawasan atas tindak lanjut dari Direksi berdasarkan audit, rekomendasi SKAI, auditor eksternal, atau pengawasan Otoritas Jasa Keuangan.

Meanwhile, for assessment by Board of Commissioners, its criteria include:

1. The implementation of good leadership, teamwork, as well as communication and competency.
2. The implementation of GCG in each of the Bank's business activities.
3. The achievement of the RBB.
4. The implementation of monitoring and follow-up from the Board of Directors based on audit, recommendation of SKAI, external auditor, or the Financial Services Authority's supervision.

Hasil Penilaian Kinerja Direksi

Hasil evaluasi kinerja Direksi memiliki peran strategis dalam merumuskan kebijakan kompensasi dan pemberian insentif, sekaligus menjadi dasar pertimbangan utama bagi Pemegang Saham dalam menentukan keberlanjutan masa jabatan maupun penggantian anggota Direksi. Sebagai wujud komitmen terhadap prinsip transparansi dan akuntabilitas, Bank menyajikan ringkasan hasil penilaian kinerja Direksi untuk tahun 2025 sebagai berikut:

The Board of Directors' Performance Assessment Results

The results of Board of Directors' performance evaluation play a strategic role in formulating compensation and incentive policies, and serve as the primary consideration for Shareholders in determining the continuation of term of office or replacement of members of the Board of Directors. As the manifestation of commitment to principles of transparency and accountability, the Bank presents a summary of the Board of Directors' performance assessment results for 2025 as follows:

Penilaian Sendiri Self-Assessment	Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners
Pada tahun 2025, hasil penilaian sendiri Direksi memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". **In 2025, the Board of Directors" self-assessment results obtained a composite score of "2 (two)" under the category of "Good".**	Pada tahun 2025, hasil penilaian kinerja Direksi oleh Dewan Komisaris memperoleh nilai komposit "2 (dua)" dengan kategori "Baik". In 2025, the Board of Directors' performance assessment results obtained a composite score of "2 (two)" under the category "Good".

Penilaian Kinerja Komite Pendukung Dewan Komisaris

Performance Assessment of the Board of Commissioners' Supporting Committees

Prosedur Pelaksanaan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Dalam rangka memperkuat penerapan GCG, Dewan Komisaris melakukan pengawasan sekaligus evaluasi terhadap kinerja Komite Audit, Komite Pemantau Risiko, serta Komite Remunerasi dan Nominasi. Penilaian dilaksanakan secara berkala, sedikitnya sekali dalam setahun, baik pada tingkat individu maupun secara kolektif. Mekanisme evaluasi mencakup penilaian sendiri oleh masing-masing komite serta penilaian langsung oleh Dewan Komisaris. Hasil dari evaluasi tersebut digunakan untuk memastikan bahwa setiap komite menjalankan perannya secara optimal, mendukung strategi Bank, dan berkontribusi pada peningkatan efektivitas pengelolaan risiko serta pencapaian target perusahaan.

Procedures for Performance Assessment of the Board of Commissioners' Supporting Committees

To strengthen GCG implementation, the Board of Commissioners supervises and evaluates the performance of Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee. Assessments are conducted periodically, at least once a year, both at individual and collective levels. The evaluation mechanism includes self-assessment by each committee as well as direct assessment by the Board of Commissioners. The results of these evaluations are used to ensure that each committee optimally carries out its role, supports the Bank's strategy, and contributes to increasing risk management effectiveness and achieving company targets.

Pihak yang Melakukan Penilaian Kinerja Komite Pendukung Dewan Komisaris

Proses penilaian mandiri atas kinerja komite pendukung Dewan Komisaris dikoordinasikan oleh Divisi *Compliance, System Procedure & Coordinator Customer Protection*, dengan hasil evaluasi yang dilaporkan kepada Dewan Komisaris. Di sisi lain, penilaian terhadap kinerja komite pendukung Dewan Komisaris oleh Dewan Komisaris dilaksanakan langsung oleh Dewan Komisaris sebagai bagian dari fungsi pengawasan.

Kriteria Penilaian Kinerja Komite Pendukung Dewan Komisaris

Untuk penilaian sendiri, kriteria penilaian meliputi 12 (dua belas)indikator *governance structure*, 6 (enam) indikator *governance process*, dan 2 (dua) indikator *governance outcome* sebagaimana diatur dalam Lampiran III Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Sementara untuk penilaian oleh Dewan Komisaris, kriteria penilaian dibuat secara umum dan diuraikan dengan penjelasan secara kualitatif (penilaian tidak dalam angka/skala) yang meliputi:

1. Kehadiran dalam rapat Komite.
2. Penguasaan materi yang akan dibahas.
3. Kesediaan menyediakan waktu dan upaya dalam memenuhi tugas dan tanggung jawab sebagai anggota komite.
4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis.
5. Kualitas dan saran yang diberikan dalam rapat-rapat.
6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing komite.
7. Pemantauan dan koreksi penyimpangan.
8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.

Party Assessing the Performance of the Board of Commissioners' Supporting Committees

The self-assessment process for the performance of committees supporting the Board of Commissioners is coordinated by the Compliance, System Procedure & Coordinator Customer Protection Division, with the evaluation results reported to the Board of Commissioners. Meanwhile, performance assessment of committees supporting the Board of Commissioners is carried out directly by the Board of Commissioners as part of its supervisory function.

Criteria for Assessing the Performance of the Board of Commissioners' Supporting Committees

For self-assessment, its criteria include 12 (twelve) governance structure indicators, 6 (six) governance process indicators, and 2 (two) governance outcome indicators as stipulated in Attachment III of the Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Meanwhile, for assessment by Board of Commissioners, its criteria are made in general and described with qualitative explanation (ratings are not in numbers/scales) which include:

1. Attendance at Committee's meeting.
2. Mastery of the material to be discussed.
3. Willingness to provide time and efforts in fulfilling duties and responsibilities as a committee member.
4. Willingness to participate in activities outside the office, such as visits to business units.
5. Quality and advice given in meetings.
6. Implementation of monitoring and evaluation, both periodically and annually, on matters that are the respective areas of duties and responsibilities of each committee.
7. Monitoring and correction of deviation.
8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each committee.

Penilaian Sendiri Self-Assessment	Penilaian oleh Dewan Komisaris Assessment by the Board of Commissioners
Pada tahun 2025, hasil penilaian sendiri pelaksanaan tugas dan tanggung jawab Komite pendukung Dewan Komisaris berada pada kategori "Good". In 2025, the self-assessment results of the implementation of duties and responsibilities of the Board of Commissioners' supporting committees were under the category of "Good".	**Komite Audit:** Dewan Komisaris menilai bahwa sepanjang tahun 2025 Komite Audit telah menunjukkan kinerja yang solid dalam mendukung efektivitas fungsi pengawasan. Komite Audit berperan aktif dalam menelaah rencana dan pelaksanaan audit, sekaligus memastikan setiap temuan ditindaklanjuti secara tepat oleh manajemen. Selain itu, Komite Audit turut memantau implementasi rekomendasi yang diberikan oleh auditor internal maupun eksternal. Upaya konsisten tersebut memberikan kontribusi nyata terhadap peningkatan kepatuhan, transparansi, dan kualitas tata kelola di lingkungan Bank. **Audit Committee:** The Board of Commissioners considered that throughout 2025, Audit Committee demonstrated solid performance in supporting the effectiveness of supervisory function. Audit Committee played an active role in reviewing audit plans and implementation, while ensuring that all findings were appropriately followed up by management. Furthermore, Audit Committee monitored the implementation of recommendations provided by internal and external auditors. These consistent efforts significantly contributed to improving compliance, transparency, and the quality of governance within the Bank. **Komite Pemantau Risiko:** Dewan Komisaris menilai bahwa sepanjang tahun 2025 Komite Pemantau Risiko telah menjalankan tugasnya dengan efektif dan memberikan kontribusi signifikan terhadap penguatan tata kelola risiko Bank. Komite Pemantau Risiko berperan aktif dalam mengidentifikasi serta menelaah potensi risiko yang dapat memengaruhi keberlangsungan operasional, sekaligus memberikan rekomendasi yang relevan untuk peningkatan sistem manajemen risiko. Melalui arahan yang strategis dan responsif terhadap dinamika lingkungan usaha, Komite Pemantau Risiko berhasil mendukung terciptanya keseimbangan antara pertumbuhan bisnis dan praktik pengelolaan risiko yang berkelanjutan. **Risk Monitoring Committee:** The Board of Commissioners considered that throughout 2025, the Risk Monitoring Committee carried out its duties effectively and made significant contribution to strengthening the Bank's risk governance. Risk Monitoring Committee played an active role in identifying and reviewing potential risks that could impact operational continuity and providing relevant recommendations for improving risk management system. Through strategic direction and responsiveness to the dynamics of business environment, the Risk Monitoring Committee managed to support the creation of a balance between business growth and sustainable risk management practices. **Komite Remunerasi dan Nominasi:** Dewan Komisaris menegaskan bahwa sepanjang tahun 2025 Komite Remunerasi dan Nominasi telah menjalankan perannya secara optimal dalam mendukung praktik GCG. Komite Remunerasi dan Nominasi berkontribusi melalui penyusunan kebijakan remunerasi yang adil dan kompetitif, sekaligus memastikan kesesuaian dengan kebutuhan dan kinerja Perseroan. Di samping itu, Komite juga berperan dalam mengkaji dan merekomendasikan calon anggota Dewan Komisaris, Direksi, maupun anggota komite independen dengan mempertimbangkan kompetensi, integritas, serta keselarasan dengan strategi jangka panjang Bank. Melalui langkah-langkah tersebut, Komite Remunerasi dan Nominasi turut memastikan keberlangsungan kepemimpinan yang efektif serta mendukung pencapaian tujuan strategis Bank. **Remuneration and Nomination Committee:** The Board of Commissioners confirmed that throughout 2025, Remuneration and Nomination Committee optimally performed its role in supporting GCG practices. The Remuneration and Nomination Committee contributed by developing fair and competitive remuneration policies, while ensuring that these policies were in line with the Company's needs and performance. Furthermore, the Committee also plays a role in reviewing and recommending candidates for the Board of Commissioners, Board of Directors, and independent committee members, by considering their competence, integrity, and alignment with the Bank's long-term strategy. Through these steps, the Remuneration and Nomination Committee helps ensure the continuity of effective leadership and support the achievement of the Bank's strategic objectives.

Penilaian Kinerja Komite dan Organ Pendukung Direksi

Prosedur dan Pihak yang Melakukan Penilaian Kinerja Komite dan Organ Pendukung Direksi

Evaluasi atas kinerja komite dan organ pendukung di bawah Direksi dilaksanakan secara tahunan untuk menilai efektivitas maupun kontribusi mereka dalam mendukung pencapaian sasaran perusahaan. Penilaian dilakukan baik secara individu

Performance Assessment of the Board of Directors' Supporting Committees and Organs

Procedures and Party Assessing the Performance of the Board of Directors' Supporting Committees and Organs

Evaluations of the performance of committees and supporting bodies under the Board of Directors are conducted annually to assess their effectiveness and contribution to the achievement of Company targets.

maupun kolektif berdasarkan sistem dan prosedur yang telah ditetapkan oleh Direksi, sehingga hasilnya bersifat transparan dan terukur. Direksi bertanggung jawab penuh terhadap proses ini, dengan tujuan memastikan peran setiap komite selaras dengan strategi bisnis, memperkuat tata kelola, dan mendorong efisiensi operasional. Hasil evaluasi selanjutnya menjadi dasar penting dalam merumuskan langkah perbaikan serta pengembangan kinerja komite di periode mendatang.

Kriteria Penilaian Komite dan Organ Pendukung Direksi

Dalam melakukan evaluasi, Direksi menetapkan sejumlah kriteria khusus sebagai acuan untuk menilai kinerja komite dan organ pendukungnya. Kriteria tersebut meliputi:

1. Kehadiran dalam rapat komite.
2. Penguasaan materi yang akan dibahas.
3. Kesediaan menyediakan waktu dan upaya dalam memenuhitugas dan tanggung jawab sebagai anggota komite.
4. Kesediaan berpartisipasi dalam kegiatan di luar kantor, seperti kunjungan ke unit bisnis.
5. Kualitas dan saran yang diberikan dalam rapat-rapat.
6. Terlaksananya pemantauan dan evaluasi, baik secara berkala maupun tahunan, atas hal-hal yang menjadi bidang tugas dan tanggung jawab masing-masing komite.
7. Pemantauan dan koreksi penyimpangan.
8. Terlaksananya pemantauan dan evaluasi terhadap divisi/unit yang terkait dengan bidang tugas dan tanggung jawab masing-masing komite.

Hasil Penilaian Kinerja Komite dan Organ Pendukung Direksi

Direksi menilai bahwa pada tahun 2025 seluruh komite dan organ pendukung telah melaksanakan perannya dengan efektif serta memberikan kontribusi nyata bagi Bank Victoria. Penilaian ini didasarkan pada hasil evaluasi menyeluruh terhadap laporan kinerja, rekomendasi, dan masukan yang disampaikan secara konsisten oleh masing-masing komite sesuai lingkup tanggung jawabnya. Direksi juga mencatat bahwa pelaksanaan tugas komite selaras dengan strategi perusahaan dan RBB tahun 2025, sekaligus mendukung penguatan tata kelola dan pencapaian sasaran bisnis. Peran aktif komite dan organ pendukung turut membantu Direksi dalam merespons dinamika usaha dan menjaga keberlanjutan kinerja Bank.

Assessments are conducted both individually and collectively based on systems and procedures established by the Board of Directors, ensuring transparent and measurable results. The Board of Directors is fully responsible for this process, with the aim of ensuring that the role of each committee is in line with business strategy, strengthening governance, and promoting operational efficiency. The evaluation results will then serve as an important basis for formulating steps to improve and develop the committee's performance in the coming period.

Assessment Criteria of the Board of Directors' Supporting Committees and Organs

In conducting evaluation, the Board of Directors determines several specific criteria as a reference for assessing the performance of committees and their supporting bodies. These criteria include:

1. Attendance at committee's meetings.
2. Mastery of the material to be discussed.
3. Willingness to allocate time and efforts in fulfilling duties and responsibilities as committee member.
4. Willingness to participate in activities outside the office, such as visits to business units.
5. Quality and advice given in the meetings.
6. Implementation of monitoring and evaluation, whether periodically or annually, on matters that are the respective areas of duties and responsibilities of each committee.
7. Monitoring and correction of deviations.
8. Implementation of monitoring and evaluation of divisions/units related to the respective areas of duties and responsibilities of each committee.

Performance Assessment Results of the Board of Directors' Supporting Committees and Organs

The Board of Directors considered that as of 2025, all committees and supporting bodies carried out their roles effectively and made a tangible contribution to Bank Victoria. This assessment is based on comprehensive evaluation of performance reports, recommendations, and input consistently submitted by each committee within its scope of responsibility. The Board of Directors also noted that the committee's duty implementation is in line with the company's strategy and the 2025 RBB, while also supporting the strengthening of governance and achievement of business targets. The active role of committees and supporting bodies also helps the Board of Directors in responding to business dynamics and maintaining the Bank's sustainable performance.

Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi [G-05]

Training and/or Competency Development for the Board of Commissioners and Board of Directors

Kebijakan Pelatihan dan/atau Peningkatan Kompetensi Dewan Komisaris dan Direksi

Sebagai bentuk komitmen terhadap peningkatan kompetensi, Bank Victoria menetapkan kebijakan pengembangan profesional bagi Dewan Komisaris dan Direksi. Kebijakan ini mencakup program orientasi serta pengembangan keterampilan yang dirancang untuk memperdalam pemahaman mengenai peran, tanggung jawab, dan arah strategis Bank. Selain itu, Bank secara berkesinambungan menyelenggarakan berbagai kegiatan peningkatan kapasitas, seperti pelatihan, seminar, dan lokakarya. Setiap peserta diwajibkan membagikan pengalaman dan pengetahuan yang diperoleh kepada anggota lainnya, sehingga manfaat pembelajaran dapat dirasakan secara kolektif.

Policy on Training and/or Competency Development for the Board of Commissioners and Board of Directors

As the commitment to competency development, Bank Victoria has established professional development policy for the Board of Commissioners and Board of Directors. This policy includes orientation and skills development programs designed to deepen understanding of the Bank's roles, responsibilities, and strategic direction. Furthermore, the Bank continuously organizes various capacity-building activities, such as training, seminar, and workshop. Each participant is required to share experiences and knowledge with other members, so that the benefits of learning can be felt collectively.

Rincian pelatihan dan program pengembangan kompetensi yang diikuti oleh Dewan Komisaris dan Direksi sepanjang tahun 2025 disajikan sebagai berikut:

Details of the training and competency development programs attended by the Board of Commissioners and Board of Directors throughout 2025 are presented below:

Dewan Komisaris
Board of Commissioners

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance		
	Zaenal Abidin Ph.D	Gunawan Tenggarahardja	Sia Leng Ho
Webinar "Sustainability Accounting and Reporting in the Financial Services" – Diselenggarakan oleh OJK Institute Webinar "Sustainability Accounting and Reporting in the Financial Services" – Organized by OJK Institute	✓	✓	✓
Ujian Sertifikasi Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Lembaga Sertifikasi Profesi Perbankan Examination of Risk Management Certification Level 7– Organized by Banking Profession Certification Institute	✓	-	-
Sharing Session "Suistainable Growth Through Digitalization and Strong Governance" – Diselenggarakan oleh Internal Bank Victoria Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally	✓	✓	✓
Training Refreshment Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Arfaidhams Secret Training Refreshment of Risk Management Level 7 – Organized by Arfaidhams Secret	✓	✓	✓

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance		
	Zaenal Abidin Ph.D	Gunawan Tenggarahardja	Sia Leng Ho
Pembekalan Sertifikasi Kompetensi Kepatuhan Jenjang 7 – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Briefing of Compliance Competency Certification Level 7 – Organized by Banking Policy Coordination and Discussion Forum	✓	-	-
Training: Expert Sharing Session "Transformasi Digital IT Perbankan" – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Training: Expert Sharing Session "Digital Transformation of Banking IT" – Organized by Indonesian Banking Development Institute	✓	✓	✓
Ujian Sertifikasi Kepatuhan Jenjang 7 – Diselenggarakan oleh Lembaga Sertifikasi Profesi Perbankan Examination of Compliance Certification Level 7– Organized by Banking Profession Certification Institute	✓	-	
Webinar Otoritas Jasa Keuangan Efek Domino Tarif Trump: Ancaman atau Peluang bagi Ekonomi Indonesia? – Diselenggarakan oleh Otoritas Jasa Keuangan Financial Services Authority Webinar on The Domino Effect of Trump's Tariffs: Threat or Opportunity for Indonesia's Economy? – Organized by Financial Services Authority	-	✓	✓
Team Building: "Work Life Balance" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work life Balance" – Organized by Bank Victoria Internally	-	✓	✓

Direksi
Board of Directors

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Sharing Session "Suistainable Growth Through Digitalization and Strong Governance" – Diselenggarakan oleh Internal Bank Victoria Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally	✓	✓	✓	✓	✓
Training Refreshment Manajemen Risiko Jenjang 7 – Diselenggarakan oleh BARA Training Refreshment of Risk Management Level 7 – Organized by BARA	✓	-	-	-	-
Webinar "Agnetic AI in Finance: A New Era of Autonomus Decision Making" – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar "Agnetic AI in Finance: A New Era of Autonomus Decision Making" – Organized by Financial Services Authority	✓	-	-	-	-
Seminar Emiten 2025 – Diselenggarakan oleh PT Kustodian Sentral Efek Indonesia Issuer Seminar 2025 – Organized by PT Kustodian Sentral Efek Indonesia	✓	-	-	-	-
Seminar: *Sunline Banking Summit Indonesia 2025* "Modernisasi *Core Banking System* Perbankan sebagai Adaptasi Perbankan dalam Iklim *AI-Powered Evolution"* – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia	✓	-	-	-	-

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Seminar: Sunline Banking Summit Indonesia 2025 "Modernization of Banking Core Banking Systems as Banking Adaptation in an AI-Powered Evolution Climate" – Organized by Indonesian Banking Development Institute					
Webinar: Launching Kampanye Nasional Berantas Scam dan Aktivitas Keuangan Ilegal serta *Seminar Internasional Preventing and Combating Financial Scams* – Diselenggarakan oleh Satuan Tugas Pemberantasan Aktivitas Keuangan Ilegal Webinar: Launching of the National Campaign to Eradicate Scams and Illegal Financial Activities and International Seminar on Preventing and Combating Financial Scams – Organized by Task Force for the Eradication of Illegal Financial Activities	✓	-	-	-	-
Webinar: Risk and Governance Summit 2025 – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar: Risk and Governance Summit 2025 – Organized by Financial Services Authority	✓	-	-	-	✓
Focus Group Discussion: Supervisi Otoritas Jasa Keuangan dalam Kegiatan Meaningful Participation – Diselenggarakan oleh Perhimpunan Bank Nasional Focus Group Discussion: Financial Services Authority Supervision in Meaningful Participation Activities – Organized by National Bank Association	✓	-	-	-	-
Seminar: Dengar Pendapat Terhadap Rancangan Surat Edaran Otoritas Jasa Keuangan *Internal Liquidity Adequacy Assessment Process* – Diselenggarakan oleh *Manaek Robert L. Toruan* Seminar: Public Hearing on the Draft Financial Services Authority Circular on Internal Liquidity Adequacy Assessment Process – Organized by Manaek Robert L. Toruan	✓	-	-	-	-
Seminar: *Green Energy Summit 2025* – Diselenggarakan oleh Investor Trust) Seminar: Green Energy Summit 2025 – Organized by Investor Trust	✓	-	-	-	-
Webinar: Peran Digital Forensik dalam Penanganan dan Pengungkapan Kejahatan Keuangan – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar: The Role of Digital Forensics in Handling and Disclosing Financial Crimes – Organized by Financial Services Authority	✓	-	-	-	-
Training: Expert Sharing Session "Transformasi Digital IT Perbankan" – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Training: Expert Sharing Session "Digital Transformation of Banking IT" – Organized by Indonesian Banking Development Institute	✓	✓	✓	✓	✓
Team Building: "Work Hard Vacation Harder" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work Hard Vacation Harder" – Organized by Bank Victoria Internally	✓	-	-	-	-
Sharing Session: Internal Liquidity Adequacy Assessment Process – Diselenggarakan oleh BARA Sharing Session: Internal Liquidity Adequacy Assessment Process – Organized by BARA	✓	-	-	-	-

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Focus Group Discussion: Festival Ekonomi Keuangan Digital Indonesia dan Indonesia *Fintech Summit & Expo* (FEKDI x IFSE) 2025 – Diselenggarakan oleh Festival Ekonomi Keuangan Digital Indonesia Focus Group Discussion: Indonesia Digital Financial Economy Festival and Indonesia Fintech Summit & Expo (FEKDI x IFSE) 2025 – Organized by Indonesia Digital Economy and Finance Festival	✓	-	-	-	-
Forum Diskusi *"Synergizing Energy, Finance & Agribusiness for A Greener Future"* – Diselenggarakan oleh Infobank Discussion Forum "Synergizing Energy, Finance & Agribusiness for a Greener Future" – Organized by Infobank	✓	-	-	-	-
Seminar: *Economic Outlook* – Diselenggarakan oleh Perhimpunan Bank Nasional Seminar: Economic Outlook – Organized by the National Bank Association	✓	-	-	-	-
Webinar: World Financial Innovation Series – Diselenggarakan oleh YugabyteDB Indonesia Webinar: World Financial Innovation Series – Organized by YugabyteDB Indonesia	✓	-	-	-	-
Sharing Session Synergizing Banking and Fintech Ecosystem to 9 Expand Credit Access – Diselenggarakan oleh Perhimpunan Bank Nasional Sharing Session Synergizing Banking and Fintech Ecosystem to 9 Expand Credit Access – Organized by the National Bank Association	✓	-	-	-	-
Focus Group Discussion: Chief Financial Officer Forum – Diselenggarakan oleh Perhimpunan Bank Nasional Focus Group Discussion: Chief Financial Officer Forum – Organized by the National Bank Association	✓	-	-	-	-
Webinar "Sustainability Accounting and Reporting in the Financial Services" – Diselenggarakan oleh OJK Institute Webinar "Sustainability Accounting and Reporting in the Financial Services" – Organized by OJK Institute	-	✓	✓	✓	-
Training Refreshment Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Arfaidhams Secret Training Refreshment of Risk Management Level 7 – Organized by Arfaidhams Secret	-	✓	✓	✓	-
Team Building: "Victoria Challenge Camp" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Victoria Challenge Camp" – Organized by Bank Victoria Internally	-	✓	-	-	-
Webinar "How to Achieve a Peak Performance in 2025" – Diselenggarakan oleh OJK Institute Webinar "How to Achieve a Peak Performance in 2025" – Organized by OJK Institute	-	-	-	-	✓
Forum Penguatan Fungsi *Governance, Risk, and Compliance* - Harmoni dalam Kolaborasi untuk Penguatan Fungsi *Governance, Risk, and Compliance* di Sektor Jasa Keuangan – Diselenggarakan oleh Otoritas Jasa Keuangan Forum on Strengthening Governance, Risk, and Compliance Functions - Harmony in Collaboration to Strengthen Governance, Risk, and Compliance Functions in Financial Services Sector – Organized by Financial Services Authority	-	-	-	-	✓

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Webinar Customer Experience: Strategies for Success in Digital Era – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar Customer Experience: Strategies for Success in Digital Era – Organized by Financial Services Authority	-	-	-	-	✓
Webinar Otoritas Jasa Keuangan Efek Domino Tarif Trump: Ancaman atau Peluang bagi Ekonomi Indonesia? – Diselenggarakan oleh Otoritas Jasa Keuangan Financial Services Authority Webinar on The Domino Effect of Trump's Tariffs: Threat or Opportunity for Indonesia's Economy? – Organized by Financial Services Authority	-	-	-	✓	✓
Training Leadership Forum for Board of Directors and Board of Commissioners – Diselenggarakan oleh Association of Certified Fraud Examiners Training Leadership Forum for Board of Directors and Board of Commissioners – Organized by Association of Certified Fraud Examiners	-	-	-	-	✓
Webinar Simposium Nasional - Sumitronomics dan Arah Ekonomi Nasional – Diselenggarakan oleh Kata Data National Symposium Webinar - Sumitronomics and the Direction of the National Economy – Organized by Kata Data	-	-	-	-	✓
Webinar The Future of Cybersecurity: Threats, Challenges, and Innovations – Diselenggarakan oleh OJK Institute Webinar The Future of Cybersecurity: Threats, Challenges, and Innovations – Organized by OJK Institute	-	-	-	-	✓
Webinar Penerapan ICoFR untuk Meningkatkan Integritas Laporan Keuangan dan Kepercayaan Publik – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Webinar on Implementing ICoFR to Improve Financial Statements' Integrity and Public Trust – Organized by Indonesian Banking Development Institute	-	-	-	-	✓
Idea Talks Volume 9 - Digitalisasi Perbankan dari Dua Sudut Pandang – Diselenggarakan oleh OJK Institute Idea Talks Volume 9 - Banking Digitalization from Two Perspectives – Organized by OJK Institute	-	-	-	-	✓
Sharing Sessions: Navigating Crisis with Confidence: Recovery and Resolution Plan sebagai Pilar Ketahanan Bank – Diselenggarakan oleh BARA Sharing Sessions: Navigating Crisis with Confidence: Recovery and Resolution Plan as Pillars of Bank Resilience – Organized by BARA	-	-	-	-	✓
Training Pembekalan Sertifikasi Kompetensi APU, PPT, & PPSPM Jenjang 7 – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Briefing Training on Competency Certification of AML, CTF, & CPF Level 7 – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Webinar Sinergi Nasional Memerangi Kejahatan Finansial – Diselenggarakan oleh Kata Data Webinar on National Synergy to Combat Financial Crime – Organized by Kata Data	-	-	-	-	✓
Webinar Dinamika Geopolitik dan Ketahanan Nasional: Strategi Memperkuat Perekonomian Indonesia – Diselenggarakan oleh OJK Institute Webinar on Geopolitical Dynamics and National Resilience: Strategies to Strengthen Indonesia's Economy – Organized by OJK Institute	-	-	-	-	✓

Materi Pelatihan dan Penyelenggara Training Materials and Organizers	Kehadiran Attendance				
	Achmad Friscantono	Rusli	Lembing	Debora Wahjutirto Tanoyo	Tamunan
Webinar Seminar Bersama Memberantas Praktik Judi Online Demi Terwujudnya Indonesia yang Lebih Baik – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Webinar: Joint Seminar on Eradicating Online Gambling Practices for a Better Indonesia – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Team Building: "Work Life Balance" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work life Balance" – Organized by Bank Victoria Internally	-	-	✓	-	✓
Ujian Sertifikasi Kepatuhan Jenjang 7 – Diselenggarakan oleh Lembaga Sertifikasi Profesi Perbankan Examination of Compliance Certification Level 7– Organized by Banking Profession Certification Institute	-	-	-	-	✓
Seminar: *Sustainability Action for The Future Economy (SAFE)* 2025 – Diselenggarakan oleh Kata Data Seminar: Sustainability Action for The Future Economy (SAFE) 2025 – Organized by Kata Data	-	-	-	-	✓
Webinar *"Risk Appetite and Risk Culture*: Pilar Utama dalam Penguatan Manajemen Risiko di Sektor Keuangan" – Diselenggarakan oleh Otoritas Jasa Keuangan Webinar "Risk Appetite and Risk Culture: Key Pillars in Strengthening Risk Management in Financial Sector" – Organized by Financial Services Authority	-	-	-	-	✓
Focus Group Discussion Penguatan Kebijakan Insentif *Likuiditas Makroprudensial* – Diselenggarakan oleh Bank Indonesia Focus Group Discussion on Strengthening Macroprudential Liquidity Incentive Policies – Organized by Bank Indonesia	-	-	-	-	✓
Webinar Forum Koordinasi dan Diskusi Kebijakan Perbankan "Memahami Pentingnya Integritas dalam Pengelolaan Lembaga Keuangan" – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Webinar of Banking Policy Coordination and Discussion Forum "Understanding the Importance of Integrity in the Management of Financial Institutions" – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Training Refreshment Sertifikasi Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Training Refreshment of Risk Management Certification Level 7 – Organized by Indonesian Banking Development Institute	-	-	-	-	✓
Webinar: *Environmental, Social, and Governance*: Inovasi Produk dan Layanan Keuangan Berkelanjutan Skema Hijau untuk Menangkap Peluang Pendaaan dan Investasi 7 – Diselenggarakan oleh Forum Koordinasi dan Diskusi Kebijakan Perbankan Webinar: Environmental, Social, and Governance: Innovation in Sustainable Financial Products and Services, Green Schemes to Seize Financing and Investment Opportunities – Organized by Banking Policy Coordination and Discussion Forum	-	-	-	-	✓
Simfoni Integritas: Kolaborasi, Inovasi, dan Ekspresi Cegah Korupsi – Diselenggarakan oleh Otoritas Jasa Keuangan Integrity Symphony: Collaboration, Innovation, and Expression to Prevent Corruption – Organized by Financial Services Authority	-	-	-	-	✓
Team Building: "Together We Grow, Together We Go" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Together We Grow, Together We Go" – Organized by Bank Victoria Internally	-	-	-	✓	-

Program Orientasi bagi Anggota Dewan Komisaris dan Direksi yang Baru Diangkat

Sebagai bagian dari komitmen Bank Victoria dalam meningkatkan efektivitas pelaksanaan tugas dan tanggung jawab organ perusahaan, Bank memiliki kebijakan penyelenggaraan program pengenalan (*induction program*) bagi anggota Dewan Komisaris dan Direksi yang baru diangkat. Program ini bertujuan untuk memberikan pemahaman yang komprehensif mengenai kondisi, sistem, serta strategi Bank, sehingga setiap anggota baru dapat segera beradaptasi dan menjalankan perannya secara optimal.

Pelaksanaan program pengenalan dikoordinasikan oleh Sekretaris Perusahaan atau pihak lain yang menjalankan fungsi Sekretaris Perusahaan. Program ini dirancang untuk mencakup berbagai aspek penting, antara lain:

1. Penyampaian informasi yang tersedia pada situs web resmi Bank.
2. Pengenalan sistem dan prosedur yang terdapat dalam intranet Bank.
3. Kunjungan kerja ke kantor cabang, khususnya cabang utama, guna memahami operasional secara langsung.
4. Pemaparan informasi yang tercantum dalam Laporan Tahunan Bank.

Melalui rangkaian kegiatan tersebut, Bank Victoria memastikan bahwa setiap anggota Dewan Komisaris dan Direksi memiliki wawasan yang memadai mengenai tata kelola, operasional, serta arah strategis perusahaan. Dengan demikian, kehadiran anggota baru diharapkan dapat segera memberikan kontribusi yang positif dalam mendukung pencapaian tujuan jangka panjang Bank.

Pada tahun 2025, Bank tidak melaksanakan program orientasi bagi Dewan Komisaris dan Direksi baru karena tidak terdapat Dewan Komisaris dan Direksi yang baru diangkat pertama kali.

Orientation Program for Newly Appointed Members of Board of Commissioners and Board of Directors

As part of Bank Victoria's commitment to improving the effectiveness of duty and responsibility implementation of corporate organs, the Bank has a policy of holding induction program for newly appointed members of the Board of Commissioners and Board of Directors. This program aims to provide a comprehensive understanding of the Bank's conditions, systems, and strategies, so that all new members can quickly adapt and optimally fulfill their role.

The implementation of induction program is coordinated by the Corporate Secretary or another party performing Corporate Secretary function. This program is designed to cover several important aspects, including:

1. Delivery of information available on the Bank's official website.
2. Introduction to systems and procedures set out in the Bank's intranet.
3. Working visit to branch offices, particularly main branch, to gain first-hand understanding of operations.
4. Presentation of information set out in the Bank's Annual Report.

Through this series of activities, Bank Victoria ensures that each member of the Board of Commissioners and Board of Directors has adequate insight into the company's governance, operations, and strategic direction. Thus, the presence of new members is expected to immediately make a positive contribution to supporting the achievement of the Bank's long-term goals.

In 2025, the Bank did not conduct any orientation program for new members of the Board of Commissioners and Board of Directors as there was no new appointments.

Penanganan Benturan Kepentingan Dewan Komisaris dan Direksi [G-09]

Handling of Conflict of Interests of the Board of Commissioners and Board of Directors

Bank menerapkan kebijakan dan mekanisme penanganan benturan kepentingan sebagai bagian dari penerapan GCG. Setiap anggota Dewan Komisaris dan Direksi, serta pihak terkait lainnya, wajib menjaga integritas dengan menghindari segala bentuk benturan kepentingan antara kepentingan pribadi dan kepentingan Bank dalam pelaksanaan tugas pengelolaan dan pengawasan.

Dalam rangka pencegahan dan pengelolaan benturan kepentingan, Bank mewajibkan pengungkapan secara transparan atas setiap potensi benturan kepentingan yang dapat memengaruhi objektivitas pengambilan keputusan. Anggota yang memiliki benturan kepentingan diwajibkan mengungkapkan kondisi tersebut dan menahan diri dari keterlibatan dalam proses pengambilan keputusan terkait, serta dilarang melakukan tindakan yang dapat merugikan atau mengurangi keuntungan Bank.

Pengungkapan benturan kepentingan dituangkan secara tertib dalam risalah rapat atau dokumen pembahasan terkait, yang paling sedikit memuat identitas pihak yang memiliki benturan kepentingan, pokok permasalahan, serta dasar pertimbangan pengambilan keputusan. Penetapan keputusan dilakukan oleh pihak yang berwenang sesuai dengan tingkat jabatan, dengan memastikan bahwa pihak yang terlibat benturan kepentingan tidak turut serta dalam proses pengambilan keputusan. Selain itu, Bank memastikan bahwa setiap transaksi dengan pihak yang memiliki hubungan istimewa dilaksanakan secara wajar dan tidak lebih menguntungkan dibandingkan dengan transaksi dengan pihak lain dalam kondisi yang serupa.

The Bank implements policies and mechanisms for handling conflicts of interest as part of GCG implementation. Each member of the Board of Commissioners and Board of Directors, as well as other related parties, is required to maintain integrity by avoiding any form of conflict of interest between personal interests and the Bank's interests in performing management and supervisory duties.

To prevent and manage conflicts of interest, the Bank requires transparent disclosure of any potential conflicts of interest that could affect the objectivity of decision-making. Members with a conflict of interest are required to disclose their situation and refrain from involvement in the related decision-making process, and also prohibited from taking any actions that could harm or reduce the Bank's profits.

Disclosure of conflicts of interest is documented in an orderly manner in meeting minutes or related discussion documents, which at least includes identity of the party with conflict of interest, the main issue, and the basis for decision-making considerations. Decisions are made by authorized parties according to their respective positions, ensuring that parties with conflicts of interest do not participate in the decision-making process. Furthermore, the Bank ensures that all transactions with related parties are conducted fairly and are not more advantageous than transactions with other parties under similar circumstances.

Mekanisme Pengunduran Diri dan Pemberhentian Dewan Komisaris dan Direksi

Resignation and Dismissal Mechanism of the Board of Commissioners and Board of Directors

Mekanisme Pengunduran Diri

Sesuai dengan ketentuan yang tercantum dalam Anggaran Dasar, Bank telah menetapkan tata cara pengunduran diri bagi anggota Dewan Komisaris dan Direksi yang diuraikan sebagai berikut:

1. Seorang anggota Dewan Komisaris dan Direksi dapat mengundurkan diri dari jabatannya dengan menyampaikan permohonan secara tertulis kepada Bank.
2. Bank Wajib menyelenggarakan RUPS untuk memutuskan permohonan pengunduran diri anggota Direksi dalam jangka waktu 90 (sembilan puluh) hari setelah diterimanya surat pengunduran diri.
3. Bank wajib melakukan keterbukaan informasi kepada masyarakat dan menyampaikan kepada Otoritas Jasa Keuangan paling lambat 2 (dua) hari kerja setelah diterimanya permohonan pengunduran diri Direksi.
4. Jika oleh suatu sebab jabatannya anggota Direksi kosong, dan jumlah anggota Direksi menjadi kurang dari 3 (tiga) orang, maka selambat-lambatnya 90 (sembilan puluh) hari kalender setelah kekosongan itu harus diadakan RUPS untuk mengisi kekosongan tersebut dengan memperhatikan peraturan perundang-undangan yang berlaku di bidang pasar modal.

Resignation Mechanism

In accordance with the provisions of the Articles of Association, the Bank has established procedures for the resignation of members of the Board of Commissioners and Board of Directors, as outlined below:

1. A member of the Board of Commissioners and Board of Directors may resign from the position by submitting a written request to the Bank.
2. The Bank is required to hold a GMS to resolve on resignation request of members of the Board of Directors within 90 (ninety) days after receipt of the resignation letter.
3. The Bank is required to disclose information to the public and submit it to the Financial Services Authority no later than 2 (two) working days after receiving the request for resignation of the Board of Directors.
4. In the event that one position of Board of Directors is vacant, and the number of the Board of Directors is less than 3 (three) members, then no later than 90 (ninety) calendar days after the vacancy, a GMS must be held to fill the vacancy by considering the applicable laws and regulations in the capital market.

Mekanisme Pemberhentian

Selain melalui pengunduran diri secara sukarela, anggota Dewan Komisaris dan Direksi juga dapat diberhentikan dari jabatannya sewaktu-waktu sesuai dengan mekanisme yang telah ditetapkan dalam Anggaran Dasar serta peraturan perundang-undangan yang berlaku. Ketentuan tersebut diuraikan sebagai berikut:

1. Anggota Dewan Komisaris dan Direksi dapat diberhentikan untuk sementara oleh RUPS dengan dengan menyebutkan alasannya setelah anggota Dewan Komisaris dan Direksi yang bersangkutan diberi kesempatan untuk membela diri.
2. Pemberhentian atau penggantian Komisaris Independen sebelum periode masa jabatannya berakhir, wajib mendapatkan persetujuan Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS.
3. Dalam rangka pemberhentian atau penggantian Komisaris Independen sebelum periode masa jabatannya berakhir, Bank menyampaikan permohonan

Dismissal Mechanism

In addition to voluntary resignation, members of the Board of Commissioners and Board of Directors may also be dismissed from their positions at any time in accordance with the mechanisms established in the Articles of Association and applicable laws and regulations. These provisions are outlined as follows:

1. Members of the Board of Commissioners and Board of Directors can be suspended by the GMS by stating the reasons after the members of the Board of Commissioners and Board of Directors concerned are given a chance to defend themselves.
2. The dismissal or replacement of an Independent Commissioner before the term of office ends shall obtain the approval of Financial Services Authority before being resolved at the GMS.
3. To dismiss or replace an Independent Commissioner before the term of office ends, the Bank shall submit a request to the Financial Services Authority no later

kepada Otoritas Jasa Keuangan paling lama 1 (satu) bulan sebelum rencana pelaksanaan RUPS yang memuat agenda pemberhentian atau penggantian dimaksud.

4. Pemberhentian atau penggantian Komisaris Independen hanya dapat diagendakan dalam RUPS setelah memperoleh persetujuan Otoritas Jasa Keuangan. Dalam hal rencana dinilai tidak layak, Bank dilarang mengagendakannya dalam RUPS, dan apabila RUPS telah dilaksanakan sebelum persetujuan Otoritas Jasa Keuangan diterbitkan, Bank wajib menyelenggarakan RUPS kembali untuk membatalkan keputusan dimaksud.
5. Anggota Direksi dapat diberhentikan untuk sementara oleh Dewan Komisaris dengan menyebutkan alasannya.
6. Pemberhentian sementara anggota Direksi wajib disampaikan secara tertulis.
7. Dewan Komisaris harus menyelenggarakan RUPS untuk mencabut atau menguatkan keputusan pemberhentian sementara.
8. RUPS wajib diselenggarakan dalam jangka waktu paling lambat 90 (sembilan puluh) hari setelah tanggal pemberhentian sementara.
9. Jika dalam waktu yang ditentukan RUPS tidak dapat mengambil keputusan, maka pemberhentian sementara menjadi batal.
10. Anggota Direksi yang diberhentikan sementara tidak berwenang untuk menjalankan kepengurusan Bank dan mewakili Bank di dalam maupun di luar pengadilan.
11. Batas kewenangan anggota Direksi berlaku sejak dikeluarkannya keputusan pemberhentian sementara oleh Dewan Komisaris sampai dengan dikeluarkannya keputusan RUPS yang menguatkan atau membatalkan pemberhentian sementara dan terlampauinya jangka waktu penyelenggaraan RUPS.
12. Apabila anggota Direksi yang diberhentikan sementara tersebut tidak hadir dalam RUPS maka anggota Direksi yang diberhentikan sementara tersebut dianggap tidak menggunakan haknya untuk membela dirinya dalam RUPS, dengan demikian anggota Direksi yang diberhentikan sementara tersebut menerima keputusan RUPS.
13. Pemberhentian atau penggantian Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan sebelum berakhirnya masa jabatan, termasuk pemberhentian sementara, wajib memperoleh persetujuan Otoritas Jasa Keuangan sebelum diputuskan dalam RUPS, dengan ketentuan bahwa pemberhentian akibat hasil penilaian kembali pihak utama dengan predikat tidak lulus dipersamakan sebagai persetujuan Otoritas Jasa Keuangan.
14. Dalam rangka pemberhentian atau penggantian Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan sebelum berakhirnya masa jabatan, Bank menyampaikan permohonan kepada Otoritas Jasa Keuangan paling lambat 1 (satu) bulan sebelum

than 1 (one) month prior to the planned GMS, including the agenda for such dismissal or replacement.

4. The dismissal or replacement of an Independent Commissioner may only be placed on the agenda of the GMS after obtaining Financial Services Authority's approval. In the event the plan is deemed unfeasible, the Bank is prohibited from placing it on the agenda of the GMS, and in the event the GMS has already been held before the issuance of Financial Services Authority's approval, the Bank shall hold another GMS to revoke such resolution.
5. Members of the Board of Directors may be suspended by the Board of Commissioners by stating the reasons.
6. The suspension of a member of the Board of Directors must be conveyed in writing.
7. The Board of Commissioners must hold a GMS to revoke or confirm the suspension decision.
8. The GMS must be held no later than 90 (ninety) days after the suspension date.
9. If within the specified time the GMS cannot adopt a resolution, then the suspension will be cancelled.
10. Members of the Board of Directors who are suspended are not authorized to carry out the management of the Bank and represent the Bank in or out of court.
11. The limits of authority of the Board of Directors' members apply from the issuance of a suspension decision by the Board of Commissioners until the issuance of a GMS resolution confirming or canceling the suspension and until the time period for holding the GMS is exceeded.
12. If the suspended members of the Board of Directors do not attend the GMS, such members are deemed not to have exercised their right to defend themselves at the GMS, thus the suspended members of the Board of Directors accept the GMS resolutions.
13. The dismissal or replacement of the President Director and/or Director in charge of compliance functions before the term of office ends, including temporary dismissal, shall obtain Financial Services Authority's approval before being resolved at the GMS, with the provision stating that dismissal resulting from reassessment by key party with a failing grade is considered equivalent to approval by the Financial Services Authority.
14. To dismiss or replace the President Director and/or Director in charge of compliance functions before the term of office ends, the Bank shall submit a request to the Financial Services Authority no later than 1 (one) month prior to the planned GMS, along with

rencana RUPS, disertai alasan, dokumen pendukung, dan/atau profil calon pengganti untuk dilakukan penilaian kemampuan dan kepatutan.

15. Pemberhentian atau penggantian Direktur Utama dan/atau Direktur yang membawahkan fungsi kepatuhan hanya dapat diagendakan dalam RUPS setelah memperoleh persetujuan Otoritas Jasa Keuangan. Dalam hal rencana dinilai tidak layak Bank dilarang mengagendakannya, dan apabila RUPS telah dilaksanakan sebelum persetujuan Otoritas Jasa Keuangan diterbitkan, Bank wajib menyelenggarakan RUPS kembali untuk membatalkan keputusan dimaksud.

16. Pengunduran diri Direksi yang mengakibatkan jumlah anggota Direksi kurang dari 3 (tiga) orang dinyatakan sah setelah ditetapkan dalam RUPS, dilakukan pengangkatan Direksi pengganti, dan memperoleh persetujuan Otoritas Jasa Keuangan, dengan ketentuan bahwa pemenuhan formasi Direksi dapat dilakukan secara bertahap berdasarkan persetujuan Otoritas Jasa Keuangan guna menjaga kelangsungan operasional Bank.

Mekanisme Direktur Pengganti

Bank menetapkan mekanisme penunjukan Direktur Pengganti (pelaksana tugas/plt) untuk setiap pembidangan Direksi guna menjamin kelangsungan pengelolaan Bank sesuai dengan ketentuan peraturan perundang-undangan. Direktur Pengganti ditetapkan dari pihak internal Bank dengan mempertimbangkan fungsi, kepentingan, serta potensi benturan kepentingan dalam proses pengambilan keputusan, dan pelaksanaan tugasnya dilakukan dalam kerangka sistem pengendalian internal yang mengacu pada prinsip *three lines of defence*.

Dalam kondisi tertentu sesuai dengan ketentuan peraturan perundang-undangan, Dewan Komisaris dapat menjalankan fungsi sebagai Direktur Pengganti dengan tetap berpedoman pada penerapan GCG, termasuk kewajiban deklarasi benturan kepentingan. Penunjukan Direktur Pengganti tidak dapat berasal dari pihak di luar Bank maupun dari pihak yang memiliki kewenangan di bawah Direksi.

Masa penugasan Direktur Pengganti ditetapkan paling lama 6 (enam) bulan dan dapat diperpanjang berdasarkan kebutuhan Bank dengan persetujuan Otoritas Jasa Keuangan, melalui penyampaian permohonan yang memuat alasan perpanjangan, rencana pemenuhan jabatan Direktur definitif, serta informasi calon Direktur Pengganti apabila telah tersedia.

the reasons, supporting documents, and/or profile of the replacement candidate for a fit and proper assessment.

15. The dismissal or replacement of the President Director and/or Director in charge of compliance functions may only be placed on the agenda of the GMS after obtaining Financial Services Authority's approval. In the event the plan is deemed unfeasible, the Bank is prohibited from placing it on the agenda, and in the event the GMS has already been held before the issuance of Financial Services Authority's approval, the Bank shall hold another GMS to revoke such resolution.

16. Resignation of a Director resulting in the number of Board of Directors being less than 3 (three) members is deemed valid after being determined at the GMS, appointing a replacement Director, and obtaining approval of the Financial Services Authority, with the provision that the Board of Directors' formation can be fulfilled gradually based on Financial Services Authority's approval to maintain the continuity of the Bank's operations.

Mechanism of Substitute Director

The Bank has established a mechanism for appointing the Substitute (acting) Board of Directors for each Director's position to ensure the continuity of the Bank's management in accordance with the laws and regulations. A Substitute Director is appointed from the Bank's internal party, by considering function, interest, and potential conflict of interest in decision-making process, and its duty is carried out within the framework of internal control system that adheres to the three lines of defense principle.

Under certain circumstances, in accordance with the laws and regulations, the Board of Commissioners may carry out its function as Substitute Director while adhering to GCG implementation, including the mandatory declaration of conflicts of interest. A Substitute Director cannot be appointed from outside the Bank or from parties with authority subordinate to the Board of Directors.

The term of office of a Substitute Director is set for a maximum of 6 (six) months and may be extended based on the Bank's needs with Financial Services Authority's approval, through the submission of a request containing reasons for extension, plan for filling the permanent Director position, and information on the Substitute Director candidate, if available.

Keberagaman Manajemen dan Independensi [G-01]

Management Diversity and Independence

Dalam rangka memperkuat praktik GCG dan mendukung keberlanjutan usaha, Bank Victoria menempatkan keberagaman dan independensi sebagai prinsip penting dalam struktur manajemen. Keberagaman tercermin melalui komposisi gender di Dewan Komisaris dan Direksi, sedangkan independensi diwujudkan melalui kehadiran anggota yang tidak memiliki hubungan kepentingan dengan Pemegang Saham, manajemen, maupun perusahaan. Kehadiran pihak independen ini berperan menjaga objektivitas serta memastikan fungsi pengawasan dijalankan secara adil dan transparan.

Rincian mengenai jumlah anggota Dewan Komisaris dan Direksi, termasuk distribusi gender serta proporsi anggota independen pada tahun 2025, disajikan dalam tabel berikut:

To strengthen GCG practices and support business sustainability, Bank Victoria prioritizes diversity and independence as key principles in its management structure. Diversity is reflected in gender composition of the Board of Commissioners and Board of Directors, while independence is demonstrated through the presence of members with no interests related to Shareholders, management, or the company. The presence of these independent parties plays a role in maintaining objectivity and ensuring that supervisory function is carried out in a fair and transparent manner.

Details on the number of members of the Board of Commissioners and Board of Directors, including gender distribution and proportion of independent members in 2025, are presented in the following table:

Tipe Manajemen Perusahaan Company Management Type	Pria Male	Wanita Female	Jumlah Pihak Independen Total Independent Parties
Dewan Komisaris Board of Commissioners	3	-	3
Direksi Board of Directors	4	1	4

Kebijakan Pemisahan Fungsi Komisaris Utama dan Direktur Utama [G-03]

Policy on Separation of Functions of President Commissioner and President Director

Dalam upaya menjaga prinsip GCG serta mendukung keberlanjutan usaha, Bank Victoria menegaskan pemisahan peran yang jelas antara Dewan Komisaris dan Direksi. Dewan Komisaris dipimpin oleh Komisaris Utama yang berfokus pada fungsi pengawasan dan pemberian arahan strategis, sedangkan Direksi dipimpin oleh Direktur Utama yang bertanggung jawab atas pengelolaan operasional sehari-hari, pencapaian kinerja, serta pelaksanaan strategi bisnis. Ketentuan mengenai pemisahan peran tersebut tertuang secara formal dalam *BOC Charter* No. 001/SK-KOM/12/23 tanggal 6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja *BOC Charter* dan *BOD Charter* No. 006A/SK-DIR/12/23 tanggal

In an effort to uphold GCG principles and support business sustainability, Bank Victoria emphasizes a clear separation of roles between the Board of Commissioners and Board of Directors. The Board of Commissioners is led by President Commissioner, who focuses on supervision and providing strategic direction, while the Board of Directors is led by President Director, who is responsible for day-to-day operational management, performance achievement, and business strategy implementation. Provisions on separation of roles are formally stated in BOC Charter No. 001/SK-KOM/12/23 dated 6 December 2023 on the BOC Charter and BOD Charter No. 006A/SK-DIR/12/23 dated 6 December 2023 on the Board of Directors Charter.

6 Desember 2023 tentang Pedoman dan Tata Tertib Kerja Direksi *(Board of Directors Charter)*. Saat ini, Dewan Komisaris dipimpin oleh Zaenal Abidin, Ph.D, selaku Komisaris Utama, sementara posisi Direktur Utama dijabat oleh Achmad Friscantono.

Currently, the Board of Commissioners is chaired by Zaenal Abidin, Ph.D, as President Commissioner, while the position of President Director is held by Achmad Friscantono.

Kebijakan Remunerasi dan Nominasi Dewan Komisaris dan Direksi

Policy on Remuneration and Nomination of the Board of Commissioners and Board of Directors

Kebijakan Nominasi

Bank Victoria menerapkan kebijakan nominasi bagi Dewan Komisaris dan Direksi dengan mengutamakan prinsip keterbukaan, profesionalisme, serta kepatuhan terhadap GCG. Proses nominasi dirancang untuk memastikan setiap calon memiliki integritas dan kompetensi yang sejalan dengan kebutuhan serta arah strategis perusahaan. Dalam hal ini, Komite Remunerasi dan Nominasi berperan penting dengan menyusun mekanisme nominasi yang menjadi acuan bagi Dewan Komisaris dan RUPS dalam menetapkan calon maupun menentukan paket remunerasi yang tepat bagi anggota Dewan Komisaris dan Direksi.

Proses Seleksi Calon Anggota Dewan Komisaris dan Direksi

Bank Victoria menerapkan proses seleksi calon anggota Dewan Komisaris dan Direksi secara terstruktur untuk memastikan terpilihnya individu yang tepat sesuai kebutuhan perusahaan. Tahapan seleksi dimulai dengan penyaringan kandidat oleh Komite Remunerasi dan Nominasi berdasarkan kriteria yang telah ditetapkan. Selanjutnya, rekomendasi dari Komite Remunerasi dan Nominasi disampaikan kepada Dewan Komisaris untuk kemudian diajukan kepada Pemegang Saham. Mekanisme ini dilakukan secara berkala menjelang berakhirnya masa jabatan, saat terdapat kebutuhan tertentu, maupun ketika terjadi kekosongan posisi dalam struktur Direksi.

Nomination Policy

Bank Victoria implements nomination policy for the Board of Commissioners and Board of Directors that prioritizes the principles of transparency, professionalism, and compliance with GCG. The nomination process is designed to ensure that every candidate has integrity and competency that are in line with the company's needs and strategic direction. In this regard, Remuneration and Nomination Committee plays a crucial role by preparing nomination mechanism that serves as a reference for the Board of Commissioners and the GMS in appointing candidates and determining appropriate remuneration packages for members of the Board of Commissioners and Board of Directors.

Selection Process for Candidates for the Board of Commissioners and Board of Directors

Bank Victoria implements a structured selection process of candidates for the Board of Commissioners and Board of Directors to ensure the selection of the right individuals to meet the company's needs. The selection process is started with Remuneration and Nomination Committee screening candidates based on established criteria. Then, recommendations from Remuneration and Nomination Committee are submitted to the Board of Commissioners, who then submit them to the Shareholders. This mechanism is carried out periodically near the end of the term of office, when specific needs arise, or when a vacant position within the Board of Directors arises.

Kriteria Khusus Pemilihan Dewan Komisaris dan Direksi [G-06]

Mengacu pada ketentuan yang diatur dalam *BOC Charter* dan *BOD Charter*, setiap calon anggota Dewan Komisaris maupun Direksi diwajibkan memenuhi sejumlah persyaratan berikut:

1. Persyaratan Formal
   a. Cakap melakukan perbuatan hukum.
   b. Dalam 5 (lima) tahun sebelum pengangkatan dan selama menjabat:
      1) Tidak pernah dinyatakan pailit.
      2) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang dinyatakan bersalah menyebabkan suatu bank dinyatakan pailit.
      3) Tidak pernah dihukum karena melakukan tindak pidana yang merugikan keuangan negara dan/atau yang berkaitan dengan sektor keuangan.
      4) Tidak pernah menjadi anggota Dewan Komisaris dan/atau Direksi yang selama menjabat:
         - Pernah tidak menyelenggarakan RUPS Tahunan.
         - Pertanggungjawabannya sebagai anggota Dewan Komisaris dan/atau Direksi pernah tidak diterima oleh RUPS atau pernah tidak memberikan pertanggungjawaban sebagai anggota Dewan Komisaris dan/atau Direksi kepada RUPS.
         - Pernah menyebabkan Bank yang memperoleh izin, persetujuan, atau pendaftaran dari Otoritas Jasa Keuangan tidak memenuhi kewajiban menyampaikan Laporan Tahunan dan/atau Laporan Keuangan kepada Otoritas Jasa Keuangan.
2. Persyaratan Material
   a. Mempunyai akhlak, moral, dan integritas yang baik.
   b. Memiliki komitmen untuk mematuhi peraturan perundang-undangan.
   c. Memiliki pengetahuan dan/atau keahlian di bidang yang dibutuhkan untuk menjalankan tugasnya.
3. Persyaratan Lainnya
   a. Anggota Dewan Komisaris tidak diperkenankan merangkap jabatan sebagai anggota Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif pada lembaga keuangan (bank atau non-bank) dan pada lebih dari 1 (satu) perusahaan bukan lembaga keuangan baik yang berkedudukan di dalam negeri atau luar negeri.
   b. Anggota Dewan Komisaris tidak termasuk rangkap jabatan apabila menjabat sebagai Direksi, anggota Dewan Komisaris, atau Pejabat Eksekutif

Specific Criteria for the Selection of Board of Commissioners and Board of Directors [G-06]

In accordance with the provisions stipulated in BOC Charter and BOD Charter, every candidate for the Board of Commissioners and Board of Directors is required to meet the following requirements:

1. Formal Requirements
   a. Capable in performing legal actions.
   b. Within 5 (five) years before appointment and during the term of office:
      1) Never been declared bankrupt.
      2) Never become a member of Board of Commissioners and/or Board of Directors who is found guilty of causing a bank to be declared bankrupt.
      3) Never been punished for committing a criminal act that is detrimental to state finances and/or related to the financial sector.
      4) Never been a member of Board of Commissioners and/or Board of Directors who during the term of office:
         - Has ever not convening an Annual GMS.
         - Has ever had his/her accountability as the member of Board of Commissioners and/or Board of Directors rejected by the GMS or has ever been absent in giving his/her accountability as the member of Board of Commissioners and/ or Board of Directors to the GMS.
         - Has ever caused a Bank that obtains permit, approval, or registration from the Financial Services Authority not to fulfill its obligation to submit its Annual Report and/or Financial Statements to the Financial Services Authority.
2. Material Requirements
   a. Have good character, morals, and integrity.
   b. Has a commitment to comply with the laws and regulations.
   c. Has knowledge and/or expertise in the field required to perform the duties.
3. Other Requirements
   a. Members of the Board of Commissioners are not allowed to concurrently hold position as a member of Board of Directors, member of Board of Commissioners, or Executive Officer in other financial institutions (bank or non-bank) and in more than 1 (one) non-financial institutions, either in Indonesia or overseas.
   b. Members of the Board of Commissioners do not hold concurrent position if holding a position as the Board of Directors, members

yang melaksanakan fungsi pengawasan pada 1 (satu) Entitas Anak Bank yang dikendalikan oleh Bank (konsolidasi).

c. Komisaris Non-Independen tidak termasuk rangkap jabatan dalam menjalankan tugas fungsional dari Pemegang Saham yang berbentuk badan hukum pada kelompok usaha Bank.
d. Anggota Direksi dilarang memangku jabatan rangkap, apabila jabatan rangkap tersebut bertentangan dengan peraturan perundang-undangan dan/atau apabila jabatan rangkap tersebut mungkin dapat menimbulkan benturan kepentingan.

Kriteria Pemilihan Ulang Dewan Komisaris dan Direksi [G-06]

Dalam rangka menjaga kesinambungan tata kelola dan efektivitas manajemen, Bank Victoria menempatkan proses pemilihan kembali anggota Dewan Komisaris dan Direksi sebagai bagian penting dari siklus kepemimpinan perusahaan. Pemilihan ulang dilakukan dengan berpedoman pada kriteria yang jelas, objektif, dan sesuai kebutuhan strategis, sehingga dapat menjamin terpilihnya pemimpin yang profesional, berintegritas, serta mampu mendukung pertumbuhan jangka panjang Bank. Seluruh tahapan proses dilaksanakan berdasarkan keputusan RUPS dan sejalan dengan prinsip-prinsip GCG.

Kebijakan Remunerasi Dewan Komisaris dan Direksi

Kebijakan remunerasi Dewan Komisaris dan Direksi merupakan upaya Bank dalam memberikan imbalan kepada Dewan Komisaris dan Direksi yang disesuaikan dengan kemampuan Bank dengan tetap memperhatikan ketahanan dan kelangsungan usaha Bank. Pemberian remunerasi kepada Dewan Komisaris dan Direksi Bank mengacu pada Keputusan Dewan Komisaris No. 001/SK-KOM/01/24 tanggal 5 Januari 2024 tentang Pedoman dan Tata Tertib Komite Remunerasi dan Nominasi PT Bank Victoria International Tbk, yang disusun berdasarkan Peraturan Otoritas Jasa Keuangan No. 45/POJK.03/2015 dan Surat Edaran Otoritas Jasa Keuangan No. 40/SEOJK.03/2016 tentang Penerapan Kelola dalam Pemberian Remunerasi bagi Bank Umum.

Prosedur Penetapan Remunerasi Dewan Komisaris dan Direksi

Bank Victoria menerapkan prosedur penetapan remunerasi bagi Dewan Komisaris dan Direksi melalui mekanisme yang transparan, terukur, dan sesuai dengan prinsip GCG yang diuraikan sebagai berikut:

of Board of Commissioners, or Executive Officer performing the supervision function in 1 (one) of the Bank's Subsidiary controlled by the Bank (consolidated).
c. Non-independent Commissioner does not hold a concurrent position in performing its functional duty from a legal entity Shareholder in the Banking business group.
d. The member of Board of Directors are not allowed to hold concurrent positions if they are contrary to the laws and regulations and/or if they possibly lead to the conflict of interest.

Criteria for Re-Election of Board of Commissioners and Board of Directors [G-06]

To maintain governance continuity and management effectiveness, Bank Victoria places re-election process for members of the Board of Commissioners and Board of Directors as a critical part of the company's leadership cycle. Re-election is conducted based on clear, objective criteria in line with strategic needs, ensuring the selection of leaders with professionalism, integrity, and ability to support the Bank's long-term growth. All stages of the process are implemented based on GMS resolution in line with GCG principles.

Remuneration Policy of the Board of Commissioners and Board of Directors

The remuneration policy for the Board of Commissioners and Board of Directors is the Bank's effort to provide compensation to the Board of Commissioners and Board of Directors that is adjusted to the Bank's capabilities, while still considering the Bank's business resilience and continuity. The provision of remuneration to the Bank's Board of Commissioners and Board of Directors refers to Board of Commissioners' Decision No. 001/SK-KOM/01/24 dated 5 January 2024 on the Guidelines and Procedures of Remuneration and Nomination Committee of PT Bank Victoria International Tbk, prepared based on the Financial Services Authority Regulation No. 45/POJK.03/2015 and Financial Services Authority Circular No. 40/SEOJK.03/2016 on Implementation of Governance in Providing Remuneration for Commercial Banks.

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

Bank Victoria implements remuneration determination procedure for the Board of Commissioners and Board of Directors through a transparent and measurable mechanism in line with GCG principles, as outlined below:

1. Komite Remunerasi dan Nominasi melakukan kajian terhadap kinerja dan memberikan usulan remunerasi bagi Direksi dan Dewan Komisaris dengan memperhatikan beberapa indikator tertentu.
2. Komite Remunerasi dan Nominasi menyampaikan rekomendasi usulan jenis dan jumlah remunerasi kepada Dewan Komisaris.
3. Dewan Komisaris mengusulkan penetapan remunerasi kepada RUPS.
4. RUPS menetapkan besaran remunerasi bagi Dewan Komisaris dan Direksi.

Jenis dan Indikator Penetapan Remunerasi Dewan Komisaris dan Direksi

Penetapan remunerasi bagi Dewan Komisaris dan Direksi Bank mempertimbangkan beberapa faktor, seperti skala dan kompleksitas usaha, kelompok pembanding (*peer group*), tingkat inflasi, kondisi serta kemampuan keuangan Bank, dan selalu sesuai dengan peraturan yang berlaku. Remunerasi variabel dirancang khusus untuk mendorong pengambilan risiko yang bijaksana dengan memperhatikan risiko utama yang memengaruhi kegiatan usaha.

Berdasarkan regulasi dan kebijakan internal, remunerasi Dewan Komisaris dan Direksi mencakup 2 (dua) jenis, yaitu:

1. Remunerasi yang Bersifat Tetap
   Diberikan dalam bentuk tunai dan/atau non-tunai, tidak terkait dengan kinerja atau risiko, dan mencakup gaji pokok, fasilitas, tunjangan perumahan, kesehatan, pendidikan, tunjangan hari raya, serta program pensiun.
2. Remunerasi yang Bersifat Variabel
   Remunerasi yang terkait dengan kinerja dan risiko, diberikan dalam bentuk tunai maupun saham atau instrumen berbasis saham yang diterbitkan oleh Bank. Bentuknya dapat berupa bonus atau insentif lainnya yang setara.

Pelaksanaan Kaji Ulang dan Independensi Penerapan Kebijakan Remunerasi

Bank Victoria memastikan objektivitas dan independensi dalam sistem remunerasi melalui mekanisme evaluasi yang terstruktur. Seluruh proses, termasuk penetapan remunerasi bagi karyawan pada unit kontrol, berada dalam pengawasan Komite Remunerasi dan Nominasi. Selain itu, kebijakan remunerasi ditinjau secara berkala dengan memperhatikan beragam aspek, seperti pencapaian kinerja, profil risiko, perbandingan dengan praktik industri sejenis, serta keselarasan dengan arah strategi jangka panjang perusahaan. Penyesuaian juga dilakukan untuk memastikan kepatuhan terhadap ketentuan regulator dan mendukung keberlanjutan kinerja perusahaan di masa depan.

1. The Remuneration and Nomination Committee reviews the performance and provides a remuneration proposal for the Board of Directors and Board of Commissioners by considering several specific indicators.
2. The Remuneration and Nomination Committee submits a recommendation on the type and amount of remuneration to the Board of Commissioners.
3. The Board of Commissioners proposes the determination of remuneration to the GMS.
4. GMS determines the remuneration amount for the Board of Commissioners and Board of Directors.

Types and Indicators to Determine Remuneration for the Board of Commissioners and Board of Directors

The determination of remuneration for the Bank's Board of Commissioners and Board of Directors considers several factors, such as business scale and complexity, comparison group (peer group), inflation rate, condition and financial capacity of the Bank, and is always in accordance with the applicable regulations. Variable remuneration is specifically designed to encourage prudent risk taking by considering main risks that affect business activities.

Based on regulations and internal policies, the remuneration for the Board of Commissioners and Board of Directors includes 2 (two) types, namely:

1. Fixed Remuneration
   Given in cash and/or non-cash, not related to performance or risk, and includes basic salary, facilities, housing allowances, health, education, holiday allowance, and pension program.
2. Variable Remuneration
   Remuneration related to performance and risk, given in cash or shares or share-based instruments issued by the Bank. It can be in form of bonus or other equivalent incentives.

Review and Independence of Remuneration Policy Implementation

Bank Victoria ensures objectivity and independence in its remuneration system through a structured evaluation mechanism. The entire process, including the determination of remuneration for employees in control unit, is under the supervision of Remuneration and Nomination Committee. Furthermore, remuneration policy is periodically reviewed, by considering various aspects, such as performance achievement, risk profile, comparison with similar industry practices, and alignment with the company's long-term strategic direction. Adjustments are also made to ensure compliance with regulatory requirements and support the company's sustainable performance in the future.

Penetapan *Material Risk Takers*

Penetapan *Material Risk Takers* (MRT) dilakukan berdasarkan 2 (dua) pendekatan berikut:

1. Metode kualitatif, yaitu MRT ditetapkan berdasarkan tanggung jawab yang memengaruhi profil risiko utama Bank, dengan evaluasi profil risiko dilakukan setiap tahun.
2. Metode kuantitatif, yaitu penetapan MRT dilakukan melalui analisis perbandingan remunerasi variabel antara MRT dan karyawan non-MRT dengan mempertimbangkan kinerja serta tingkat risiko dari posisi tersebut.

Oleh karena itu, Dewan Komisaris, Direksi, atau karyawan yang menerima remunerasi variabel dalam jumlah besar dikategorikan sebagai MRT.

Penangguhan atau Penarikan Kembali Remunerasi

Remunerasi untuk Dewan Komisaris dan Direksi dapat ditangguhkan atau ditarik kembali apabila Bank mengalami kerugian yang menyebabkan remunerasi tidak dapat diberikan secara penuh atau hanya dalam bentuk variabel dengan jumlah yang kecil. Ketentuan ini sesuai dengan regulasi pemberian remunerasi bagi Bank Umum. Selain itu, Bank wajib menangguhkan atau menarik kembali remunerasi variabel bagi Dewan Komisaris dan Direksi (*malus* atau *clawback*) jika terjadi kerugian akibat kondisi yang merugikan keuangan Bank, seperti kasus *fraud* oleh individu yang dikategorikan sebagai MRT, atau situasi lainnya. Penangguhan ini berlangsung minimal 3 (tiga) tahun dan dapat diperpanjang sesuai dengan periode risiko yang dihadapi. Dalam kondisi ini, Dewan Komisaris dan Direksi tidak diperbolehkan melakukan lindung nilai atas remunerasi variabel yang ditangguhkan.

Kaitan Remunerasi dengan Risiko dan Kinerja

Remunerasi variabel untuk Dewan Komisaris dan Direksi ditetapkan dengan mempertimbangkan risiko utama yang dihadapi oleh Bank, dengan evaluasi berdasarkan kriteria dan dampak risiko tersebut. Jika risiko utama terjadi, remunerasi bagi Dewan Komisaris dan Direksi sebagai MRT akan terpengaruh. Penilaian kinerja dilakukan baik secara individu maupun kolegial, dan hasil penilaian ini menjadi dasar bagi Komite Remunerasi dan Nominasi untuk memberikan rekomendasi kepada Dewan Komisaris terkait besaran remunerasi yang tepat. Rekomendasi ini kemudian diajukan kepada RUPS untuk penetapan akhir remunerasi.

Establishing Material Risk Takers

The establishment of Material Risk Takers (MRT) is carried out based on the following 2 (two) approaches:

1. Qualitative method, in which MRT is determined based on responsibility that affects the Bank's main risk profile, with risk profile evaluation carried out annually.
2. Quantitative method, in which the determination of MRT is carried out through a comparative analysis of variable remuneration between MRT and non-MRT employees by considering their performance and positional risk level.

Therefore, the Board of Commissioners, Board of Directors, or employees receiving large amounts of variable remuneration are categorized as the MRT.

Remuneration Suspension or Clawback

Remuneration for the Board of Commissioners and Board of Directors may be suspended or clawback if the Bank suffers a loss which causes remuneration unable to be given in full or only in form of variable with a small amount. This provision is in accordance with the regulation on providing remuneration for Commercial Banks. In addition, the Bank must suspend or withdraw variable remuneration for the Board of Commissioners and Board of Directors (malus or clawback) if a loss occurs due to conditions that cause losses to the Bank's finances, such as cases of fraud by individuals categorized as MRT, or other situations. This suspension lasts for a minimum of 3 (three) years and can be extended according to the risk period faced. In this condition, the Board of Commissioners and Board of Directors are not allowed to hedge on the deferred variable remuneration.

Connection of Remuneration with Risk and Performance

Variable remuneration for the Board of Commissioners and Board of Directors is determined by considering the main risks faced by the Bank, with an evaluation based on the criteria and impact of the risk. If the main risk occurs, the remuneration for the Board of Commissioners and Board of Directors as the MRT will be affected. Performance assessments are carried out both individually and collegially, and the results of this assessment serve the basis for the Remuneration and Nomination Committee to provide recommendations to the Board of Commissioners regarding the appropriate amount of remuneration. This recommendation is then submitted to the GMS for final determination of remuneration.

Konsultan terkait Kebijakan Remunerasi

Dalam penyusunan kebijakan remunerasi, Bank Victoria sepenuhnya mengandalkan mekanisme internal tanpa melibatkan pihak konsultan eksternal. Hal ini mencerminkan komitmen Bank untuk menjaga independensi, objektivitas, serta kesesuaian kebijakan dengan kebutuhan dan strategi perusahaan.

Consultant regarding Remuneration Policy

In developing remuneration policy, Bank Victoria relies entirely on internal mechanisms without involving external consultants. This matter reflects the Bank's commitment to maintaining independence, objectivity, and policy alignment with the company's needs and strategy.

Struktur dan Besaran Remunerasi Dewan Komisaris dan Direksi

Struktur remunerasi bagi Dewan Komisaris dan Direksi Bank Victoria disusun dengan mempertimbangkan keseimbangan antara kepastian pendapatan dan penghargaan atas kinerja. Komponen remunerasi terdiri dari remunerasi tetap, berupa honorarium serta berbagai fasilitas, seperti asuransi kesehatan, kendaraan dinas, BPJS Ketenagakerjaan, dan tunjangan hari raya. Selain itu, diberikan pula remunerasi variabel yang mencakup tantiem, gratifikasi, maupun saham, dengan skema pembayaran dalam bentuk tunai maupun non-tunai, termasuk natura (rumah, kendaraan dinas, atau aset lainnya yang bisa dimiliki atau tidak). Besaran remunerasi variabel ditetapkan berdasarkan capaian kinerja, kontribusi, dan tanggung jawab masing-masing anggota.

Untuk tahun buku 2025, detail mengenai paket remunerasi beserta fasilitas yang diterima Dewan Komisaris dan Direksi disajikan pada tabel berikut:

Remuneration Structure and Amount for the Board of Commissioners and Board of Directors

The remuneration structure for the Board of Commissioners and Board of Directors of Bank Victoria is designed with a balance between income certainty and performance rewards. Remuneration components consist of fixed remuneration in form of honorarium and various benefits, such as health insurance, official vehicles, BPJS Employment, and holiday allowance. Furthermore, variable remuneration is provided, including bonus, gratification, and shares, with payment scheme in cash or non-cash, including in-kind benefits (house, official vehicle, or other assets that may or may not be owned). The amount of variable remuneration is determined based on performance achievements, contributions, and responsibilities of each member.

For the 2025 fiscal year, details of remuneration packages and benefits received by the Board of Commissioners and Board of Directors were presented in the following table:

Remunerasi Dewan Komisaris dan Direksi berdasarkan Jenis
Remuneration for the Board of Commissioners and Board of Directors by Type

Jenis Remunerasi Type of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Total (Rp)	Orang People	Total (Rp)
Remunerasi Bersifat Tetap (Gaji, THR, dan TAT) Fixed Remuneration (Salary, THR, and TAT Allowance)	3	3,337,808,457	5	17,011,181,236
Remunerasi Bersifat Variabel (Bonus) Variable Remuneration (Bonus)	3	436,203771	5	2,196,696,460
Total		**3,774,012,228**		**19,207,877,696**

Remunerasi Dewan Komisaris dan Direksi berdasarkan Bentuk
Remuneration for the Board of Commissioners and Board of Directors by Form

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Total (Rp)	Orang People	Total (Rp)
Remunerasi dalam Bentuk Tunai Remuneration in the Form of Cash	3	3,774,012,228	5	19,207,877,696
Remunerasi dalam Bentuk Natura Remuneration in the Form of Natura	-	-	-	-

Bentuk Remunerasi Form of Remuneration	Dewan Komisaris Board of Commissioners		Direksi Board of Directors	
	Orang People	Total (Rp)	Orang People	Total (Rp)
Remunerasi dalam Bentuk Saham Remuneration in the Form of Shares	-	-	-	-
Total		3,774,012,228		19,207,877,696

Remunerasi Dewan Komisaris dan Direksi berdasarkan Rentang Nilai
Remuneration for the Board of Commissioners and Board of Directors by Value Range

Total Remunerasi dalam Setahun Total Remuneration in a Year	Total Dewan Komisaris Total Board of Commissioners (Orang / People)	Total Direksi Total Board of Directors (Orang / People)
Di atas Rp2 miliar Above Rp2 billion	-	5
Di atas Rp1 miliar-Rp2 miliar Above Rp1 billion-Rp2 billion	3	-
Di atas Rp500 juta-Rp1 miliar Above Rp500 million-Rp1 billion	-	-
Di bawah Rp500 juta Below Rp500 million	-	-

Remunerasi Dewan Komisaris dan Direksi berdasarkan Rata-Rata Total
Remuneration for the Board of Commissioners and Board of Directors by Total Average

Uraian Description	Total Individu Total Individual	Rata-Rata Remunerasi per Orang Average Remuneration per Person
Dewan Komisaris Board of Commissioners	3	Rp85 juta
Direksi Board of Directors	5	Rp255 juta

Remunerasi Dewan Komisaris dan Direksi berdasarkan Jabatan
Remuneration for the Board of Commissioners and Board of Directors by Position

Uraian Description	Gaji Pokok Basic Salary (Rp)	Bonus (Rp)	Tunjangan Allowances (Rp)	Total Remunerasi Total Remuneration (Rp)
Dewan Komisaris Board of Commissioners	2,814,558,768	436,203,771	523,249,689	3,774,012,228
Direksi Board of Directors	14,618,148,396	2,196,696,460	2,393,032,840	19,207,877,696

Remunerasi yang Ditangguhkan atau Ditarik Kembali

Pada tahun 2025, seluruh remunerasi yang diberikan kepada Dewan Komisaris dan Direksi telah dibayarkan secara penuh sesuai ketentuan yang berlaku. Tidak terdapat penundaan maupun penarikan kembali atas remunerasi yang telah ditetapkan.

Pengungkapan Bonus Kinerja, Bonus Non-Kinerja, dan Opsi Saham

Sepanjang tahun 2025, Bank tidak memberikan bonus berbasis kinerja, bonus non-kinerja, maupun program opsi saham kepada Dewan Komisaris dan Direksi. Seluruh kompensasi yang diterima terbatas pada komponen remunerasi yang telah ditetapkan sesuai kebijakan Bank.

Permasalahan yang Timbul sebagai Dampak Kebijakan Remunerasi

Pada tahun 2025, tidak terdapat permasalahan yang timbul sebagai dampak kebijakan remunerasi yang diterapkan oleh Bank.

Rasio Gaji Tertinggi dan Terendah

Bank Victoria senantiasa mengedepankan keterbukaan dalam penyusunan struktur penggajian di seluruh level organisasi. Penetapan rasio antara gaji tertinggi dan terendah dilakukan dengan memperhatikan asas keadilan, kontribusi kinerja, serta lingkup tanggung jawab masing-masing jabatan. Untuk tahun 2025, rasio penggajian tersebut disajikan sebagai berikut:

Suspended or Clawback Remuneration

In 2025, all remuneration provided to the Board of Commissioners and Board of Directors was paid in full in accordance with applicable regulations. There were no delays or withdrawals of the stipulated remuneration.

Disclosure of Performance Bonus, Non-Perfomance Bonus, and Stock Option

Throughout 2025, the Bank did not provide performance-based bonus, non-performance bonus, or stock option program to the Board of Commissioners and Board of Directors. All compensation received was limited to remuneration components determined in accordance with the Bank's policy.

Issues Arising from the Impact of Remuneration Policy

In 2025, there were no issues arising from the remuneration policy implemented by the Bank.

Ratio of Highest and Lowest Salary

Bank Victoria consistently prioritizes transparency in preparing salary structure at all levels of the organization. The ratio between the highest and lowest salary is determined by considering the principles of fairness, performance contribution, and scope of responsibility of each position. For 2025, the salary ratio was presented as follows:

Uraian	Rasio Ratio	Description
Gaji Tertinggi dan Terendah Dewan Komisaris	**1:1.2**	Board of Commissioners' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Direksi	**1:1.59**	Board of Directors' Highest and Lowest Salary
Gaji Tertinggi dan Terendah Karyawan	**1:17**	Employees' Highest and Lowest Salary

Komite di Bawah Dewan Komisaris
Board of Commissioners' Subordinate Committees

Komite Pemantau Risiko

Komite Pemantau Risiko dibentuk oleh Dewan Komisaris untuk mendukung fungsi pengawasan dan memberi arahan kepada Direksi. Komite Pemantau Risiko memastikan kerangka manajemen risiko Bank berjalan efektif, menjaga aktivitas bisnis dalam batas risiko yang wajar, sekaligus mendorong pertumbuhan yang terkendali dan berkelanjutan.

Pedoman Komite Pemantau Risiko

Komite Pemantau Risiko menjalankan tugasnya berdasarkan Pedoman Kerja Komite Pemantau Risiko yang diperbarui pada 18 Juni 2025 melalui Keputusan Komisaris No. 002/SK-KOM/06/25. Pedoman kerja ini menjadi acuan bagi efektivitas fungsi pengawasan serta penguatan tata kelola dan manajemen risiko Bank.

Tugas dan Tanggung Jawab Komite Pemantau Risiko

Tugas dan tanggung jawab Komite Pemantau Risiko meliputi:

1. Melakukan pengkajian ulang dan memberikan rekomendasi atas efektivitas pelaksanaan manajemen risiko Bank melalui pertemuan secara berkala maupun cara lainnya untuk membahas progres dari tahapan-tahapan tugas dan tanggung jawab yang dilakukan oleh Satuan Kerja Manajemen Risiko.
2. Melakukan pengawasan atas kegiatan Satuan Kerja Manajemen Risiko dalam memantau pelaksanaan mitigasi risiko oleh unit-unit kerja terkait.
3. Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko.
4. Melakukan analisis dan evaluasi atas usulan Rencana Kegiatan dan Anggaran Bank serta pengkajian ulang tahunan atas rencana jangka panjang Bank yang diajukan oleh Direksi.
5. Melakukan penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang akan dipublikasikan.

Risk Monitoring Committee

Risk Monitoring Committee is established by the Board of Commissioners to support the supervisory function and provide direction to the Board of Directors. Risk Monitoring Committee ensures that the Bank's risk management framework is effective and maintains business activities within reasonable risk limits while promoting controlled and sustainable growth.

Risk Monitoring Committee Charter

The Risk Monitoring Committee carries out its duties based on Risk Monitoring Committee Work Guidelines, updated on 18 June 2025 through the Board of Commissioners' Decision No. 002/SK-KOM/06/25. These work guidelines serve as a reference for ensuring the effectiveness of oversight function and strengthening the Bank's governance and risk management.

Duties and Responsibilities of the Risk Monitoring Committee

Duties and responsibilities of the Risk Monitoring Committee are as follows:

1. Reviewing and providing recommendations on the effectiveness of the Bank's risk management implementation through regular meetings or other methods to discuss the progress of duties and responsibilities carried out by the Risk Management Work Unit.
2. Overseeing activities of the Risk Management Work Unit in monitoring the implementation of risk mitigation by related work units.
3. Overseeing the implementation of the Committee's recommendations by the Risk Management Work Unit.
4. Performing analysis and evaluation of Bank Activity and Budget Plan proposal, as well as annual review of the Bank's long-term plan submitted by the Board of Directors.
5. Reviewing the Bank's risk information and Bank risk management in reports to be published.

Persyaratan Komite Pemantau Risiko

Keanggotaan Komite Pemantau Risiko paling sedikit terdiri dari:
1. 1 (satu) orang Komisaris Independen yang merangkap sebagai ketua.
2. 1 (satu) orang pihak independen yang memiliki keahlian di bidang manajemen risiko.
3. 1 (satu) orang pihak independen yang memiliki keahlian di bidang keuangan.

Anggota Komite Pemantau Risiko yang berasal dari pihak independen dinilai memiliki keahlian di bidang manajemen risiko dalam hal memenuhi kriteria:
1. Memiliki sertifikat kompetensi di bidang manajemen risiko yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui sebagaimana yang berlaku bagi Direksi.
2. Memiliki pengalaman kerja paling sedikit 2 (dua) tahun di bidang manajemen risiko.

Anggota Komite Pemantau Risiko yang berasal dari pihak independen dinilai memiliki keahlian di bidang keuangan dalam hal memenuhi kriteria:
1. Memiliki sertifikat kompetensi di bidang, antara lain akuntan publik, akuntan, treasuri, dan *corporate finance* yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
2. Memiliki pengalaman kerja paling sedikit 5 (lima) tahun di bidang ekonomi, bidang keuangan, dan/atau bidang perbankan.

Komposisi dan Masa Jabatan Komite Pemantau Risiko

Komite Pemantau Risiko dibentuk sekurang-kurangnya terdiri dari 3 (tiga) orang anggota, yaitu seorang ketua yang merangkap Komisaris Independen serta 2 (dua) anggota lainnya dari pihak independen. Masa jabatan anggota Komite Pemantau Risiko tidak melebihi masa jabatan Dewan Komisaris sesuai Anggaran Dasar, dan dapat diperpanjang untuk 1 (satu) periode berikutnya.

Per 31 Desember 2025, komposisi Komite Pemantau Risiko Bank yang diangkat berdasarkan Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko, untuk masa jabatan 2025-sekarang sebagai berikut:

Requirements for the Risk Monitoring Committee

The composition of Risk Monitoring Committee shall consist of at least:
1. 1 (one) Independent Commissioner concurrently as chairman.
2. 1 (one) independent party with expertise in risk management.
3. 1 (one) independent party with expertise in finance.

Member of Risk Monitoring Committee from independent party is deemed to have expertise in risk management, as defined by the following criteria:
1. Has competency certificate in risk management issued by a recognized domestic or international institution, as applicable to the Board of Directors.
2. Has at least 2 (two) years of work experience in risk management.

Member of Risk Monitoring Committee from independent party is deemed to have expertise in finance, as defined by the following criteria:
1. Has competency certificate in fields, including public accounting, accountant, treasury, and corporate finance issued by a recognized domestic or international institution.
2. Has at least 5 (five) years of work experience in economics, finance, and/or banking.

Composition and Term of Office of the Risk Monitoring Committee

The Risk Monitoring Committee is established with at least 3 (three) members, namely one chairman concurrently as Independent Commissioner and 2 (two) other members from independent parties. The term of office of Risk Monitoring Committee members shall not exceed the term of office of the Board of Commissioners as stipulated in the Articles of Association and can be extended for 1 (one) subsequent period.

As of 31 December 2025, the composition of the Bank's Risk Monitoring Committee, appointed based on Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee, for the 2025-present term of office is as follows:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Zaenal Abidin Ph.D	Ketua Chairman	Komisaris Utama Independen Independent President Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG
Gunawan Tenggarahardja	Anggota Member	Komisaris Independen Independent Commissioner	Perbankan Banking
Medi Sejati	Anggota Member	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Taufiq Akbar	Anggota Member	Pihak Independen Independent Party	Keuangan, Perbankan, dan Manajemen Risiko Finance, Banking, and Risk Management

Profil Komite Pemantau Risiko
Risk Monitoring Committee's Profile

ZAENAL ABIDIN PH.D
Ketua
Chairman

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Profil dapat dilihat pada profil Dewan Komisaris.
Profile can be seen in the Board of Commissioners' profile chapter.

GUNAWAN TENGGARAHARDJA
Anggota
Member

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Profil dapat dilihat pada profil Dewan Komisaris.
Profile can be seen in the Board of Commissioners' profile chapter.

MEDI SEJATI

Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
60 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Riwayat Pendidikan
- Diploma Manajemen Perbankan dari Sekolah Tinggi Ilmu Ekonomi AKPI Bandung (1990).

Rangkap Jabatan Saat Ini
Di dalam Bank Victoria:
Anggota Komite Audit Bank Victoria (sejak 2021).

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan Sebelumnya
- Kolektor PT Jasa Marga (Persero) Tbk (1984-1986).
- *Teller* PT Bank Swadesi (1990-1991).
- Menjabat di PT Bank Intan (1991-1999) sebagai:
  - Sekretaris Kepala Biro Kredit.
  - *Internal Control Officer*.
  - Kepala Bagian Audit Kredit dan *Marketing*.
  - Kepala Bagian Kredit Support.
- Auditor Kantor Akuntan Publik Edi Kaslim & Kantor Akuntan Publik Gatot Permadi Djuwono (1999-2002).
- Kepala Bagian Akunting PT Bank Harmoni Internasional (2002-2007).
- Kepala Bagian Akunting PT Bank Index Selindo (2007-2008).
- Kepala Bagian Akunting PT Bank Swaguna (2008-2010).
- Kepala Divisi Akunting PT Bank Victoria Syariah (2010-2014).
- Akunting *Officer* Bank Victoria (2014).
- Kepala Bagian Sentral Operasional PT Bank Victoria Syariah (2014).
- Kepala Bagian *Support* Pembiayaan PT Bank Victoria Syariah (2015).
- Kepala Divisi Manajemen Risiko dan Kepatuhan PT Bank Victoria Syariah (2015-2016).
- Kepala Divisi Kepatuhan dan Sekretaris Perusahaan PT Bank Victoria Syariah (2017-2019).
- Kepala Divisi Kepatuhan PT Bank Victoria Syariah (2019-2020).
- Anggota Komite Audit PT Victoria Alife Indonesia (2021).
- Anggota Komite Pemantau Risiko PT Victoria Alife Indonesia (2021).
- Anggota Komite Audit Bank Victoria Syariah (2021-2025).
- Anggota Komite Pemantau Risiko Bank Victoria Syariah (2021-2025).

Basis of Appointment and Term of Office
Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Education
- Diploma of Banking Management from Sekolah Tinggi Ilmu Ekonomi AKPI Bandung (1990).

Current Concurrent Positions
In Bank Victoria:
Member of Audit Committee of Bank Victoria (since 2021).

Outside of Bank Victoria:
None.

History of Previous Positions
- Collector of PT Jasa Marga (Persero) Tbk (1984-1986).
- Teller of PT Bank Swadesi (1990-1991).
- Held positions at PT Bank Intan (1991-1999) as:
  - Secretary of Credit Bureau Head.
  - Internal Control Officer.
  - Credit and Marketing Audit Department Head.
  - Credit Support Department Head.
- Auditor of Edi Kaslim Public Accounting Firm & Gatot Permadi Djuwono Public Accounting Firm (1999-2002).
- Head of Accounting Department of PT Bank Harmoni Internasional (2002-2007).
- Head of Accounting Department of PT Bank Index Selindo (2007-2008).
- Accounting Division Head of PT Bank Swaguna (2008-2010).
- Accounting Division Head of PT Bank Victoria Syariah (2010-2014).
- Accounting Officer of Bank Victoria (2014).
- Central Operational Department Head of PT Bank Victoria Syariah (2014).
- Financing Support Department Head of PT Bank Victoria Syariah (2015).
- Risk Management and Compliance Division Head of PT Bank Victoria Syariah (2015-2016).
- Compliance Division Head and Corporate Secretary of PT Bank Victoria Syariah (2017-2019).
- Compliance Division Head of PT Bank Victoria Syariah (2019-2020).
- Member of Audit Committee of PT Victoria Alife Indonesia (2021).
- Member of Risk Monitoring Committee of PT Victoria Alife Indonesia (2021).
- Member of Audit Committee of Bank Victoria Syariah (2021-2025).
- Member of Risk Monitoring Committee of Bank Victoria Syariah (2021-2025).

Sertifikasi
- Sertifikasi Manajemen Risiko Level 1 dari Badan Sertifikasi Manajemen Risiko (2007).
- Sertifikasi Manajemen Risiko Level 2 dari Badan Sertifikasi Manajemen Risiko (2011).
- Sertifikasi Manajemen Risiko Level 3 dari Badan Sertifikasi Manajemen Risiko (2018).
- Sertifikasi Kepatuhan Level 1 dari Lembaga Sertifikasi Profesi Perbankan (2018).
- Sertifikasi Kepatuhan Level 2 dari Lembaga Sertifikasi Profesi Perbankan (2018).
- *Certification in Audit Committee Practices* (CACP) (2023).
- Sertifikasi Manajemen Risiko - Jenjang 5 dari Lembaga Sertifikasi Perbankan Keuangan Syariah (2024).
- Sertifikasi Manajemen Risiko - Jenjang 6 dari Lembaga Sertifikasi Perbankan Keuangan Syariah (2025).
- Sertifikasi Manajemen Risiko - Jenjang 7 dari Lembaga Sertifikasi Perbankan Keuangan Syariah (2025).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Certification
- Risk Management Certification Level 1 from the Risk Management Certification Institution (2007).
- Risk Management Certification Level 2 from the Risk Management Certification Institution (2011).
- Risk Management Certification Level 3 from the Risk Management Certification (2018).
- Compliance Certification Level 1 from the Banking Professional Certification Institute (2018).
- Compliance Certification Level 2 from the Banking Professional Certification Institute (2018).
- Certification in Audit Committee Practices (CACP) (2023).
- Certification of Risk Management - Level 5 from Sharia Financial Banking Certification Institution (2024).
- Certification of Risk Management - Level 6 from Sharia Financial Banking Certification Institution (2025).
- Certification of Risk Management - Level 7 from Sharia Financial Banking Certification Institution (2025).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

TAUFIQ AKBAR
Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Palembang

Usia / Age
38 tahun / years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Surat Keputusan Direksi No. 003/SK-DIR/08/25 tanggal 1 Agustus 2025 tentang Susunan Anggota Komite Pemantau Risiko (2025-sekarang).

Riwayat Pendidikan
- Sarjana Akuntansi dari Universitas Islam Indonesia (2010).
- Magister Akuntansi dari Universitas Gadjah Mada (2012).

Rangkap Jabatan
Di dalam Bank Victoria:
Anggota Komite Audit Bank Victoria (sejak 2025).

Di luar Bank Victoria:
Dosen di Perbanas Institute (sejak 2015).

Riwayat Jabatan Sebelumnya
- Auditor KAP Bismar, Munthalib dan Yunus (2012-2013).
- Auditor KAP Joachim, Poltak, Lian, Michell & Rekan (2014).
- Komite Audit PT Sumberdaya Sewatama (2021-2023).

Sertifikasi
- *Chartered Accountant* dari Ikatan Akuntan Indonesia (2014).
- *Certification in Audit Committee Practices* dari Ikatan Komite Audit Indonesia (2021).
- Sertifikasi Manajemen Risiko - Jenjang 4 dari Lembaga Sertifikasi Profesi Perbankan (2025).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision Letter No. 003/SK-DIR/08/25 dated 1 August 2025 on the Composition of the Risk Monitoring Committee (2025-present).

Education
- Bachelor's Degree in Accounting from Islamic University of Indonesia (2010).
- Master of Accountancy from Gadjah Mada University (2012).

Concurrent Positions
In Bank Victoria:
Member of Audit Committee of Bank Victoria (since 2025).

Outside of Bank Victoria:
Lecturer at Perbanas Institute (since 2015).

History of Previous Positions
- Auditor at KAP Bismar, Munthalib, and Yunus (2012–2013).
- Auditor at KAP Joachim, Poltak, Lian, Michell & Rekan (2014).
- Audit Committee of PT Sumberdaya Sewatama (2021-2023).

Certification
- Chartered Accountant from Institute of Indonesia Chartered Accountants (2014).
- Certification in Audit Committee Practices from the Indonesian Audit Committee Association (2021).
- Risk Management Certification – Level 4 from Banking Professional Certification Institute (2025).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Independensi Komite Pemantau Risiko

Anggota Komite Pemantau Risiko ditetapkan dengan memperhatikan pemenuhan prinsip independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali.
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung.
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi.
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Pemantau Risiko.
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Independency of Risk Monitoring Committee

Members of the Risk Monitoring Committee are appointed by considering the following independence principles:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders.
2. Does not have share ownership relationship in the Bank, either directly or indirectly.
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company.
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Risk Monitoring Committee.
5. Does not hold position as administrator of political party, state, and government.

Rapat Komite Pemantau Risiko

Rapat Komite Pemantau Risiko diselenggarakan minimal sekali setiap bulan dengan kehadiran sekurang-kurangnya 51% anggota, termasuk Komisaris Independen. Keputusan rapat diambil secara musyawarah mufakat atau suara terbanyak, dan dituangkan dalam risalah yang bersifat mengikat. Dalam hal terdapat konflik kepentingan, anggota yang bersangkutan tidak dilibatkan dalam pengambilan keputusan.

Risk Monitoring Committee's Meeting

Risk Monitoring Committee meetings are held at least once a month with at least 51% attendance of members, including Independent Commissioners. Meeting decisions are made by consensus or majority vote, and are recorded in binding minutes. In the event of a conflict of interest, the member concerned is not involved in the decision-making.

Rekapitulasi kehadiran masing-masing anggota Komite Pemantau Risiko dalam rapat di tahun 2025 sebagai berikut:

The summary of attendance of each member of Risk Monitoring Committee at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Ketua Chairman	12	12	100.00
Gunawan Tenggarahardja	Anggota Member	12	12	100.00
Medi Sejati	Anggota Member	12	12	100.00
Taufiq Akbar*	Anggota Member	5	5	100.00
Yozef Abdulrachman*	Anggota Member	7	7	100.00

* Per 1 Agustus 2025, telah dilakukan perubahan keanggotaan Komite Pemantau Risiko, di mana Bapak Yozef Abdulrachman tidak lagi menjabat sebagai anggota Komite Pemantau Risiko dan posisinya digantikan oleh Bapak Taufiq Akbar. Perubahan tersebut dilakukan sesuai dengan ketentuan dan keputusan yang berlaku.

As of 1 August 2025, changes were made to the composition of the Risk Monitoring Committee. Mr. Yozef Abdulrachman no longer served as member of the Risk Monitoring Committee and his position was replaced by Mr. Taufiq Akbar. These changes were made in accordance with applicable regulations and decisions.

Agenda Rapat Komite Pemantau Risiko

Rapat Komite Pemantau Risiko membahas berbagai agenda, antara lain:

1. Laporan Tingkat Kesehatan Bank Periode Semester II Tahun 2024 PT Bank Victoria International Tbk dan Laporan Direktur Kepatuhan Periode Semester II Tahun 2024 PT Bank Victoria International Tbk.

Risk Monitoring Committee's Meeting Agenda

Risk Monitoring Committee meetings discuss various agenda items, including:

1. Bank Sound Level Report for Semester II of 2024 for PT Bank Victoria International Tbk and Compliance Director's Report for Semester II of 2024 for PT Bank Victoria International Tbk.

2. *Risk Register* Divisi *Operation* dan Divisi IT dan pemeriksaan Otoritas Jasa Keuangan kantor wilayah di cabang Medan dan Solo.
3. *Risk Register* Divisi SAM dan Peraturan Otoritas Jasa Keuangan dan Peraturan Bank Indonesia turunan Undang-Undang Pengembangan dan Penguatan Sektor Keuangan (P2SK) dan kaitannya dengan kebijakan internal bank.
4. Laporan Profil Risiko Periode Triwulan I Tahun 2025 dan Laporan *Self-Asessment* GCG Tahunan Tahun 2024.
5. Laporan Profil Risiko dan *Key Risk Indicator* (KRI) Periode April 2025 dan Pengisian Survei Otoritas Jasa Keuangan: Penilaian Mandiri Pedoman SETARA.
6. Laporan Profil Risiko, *Risk Register* HCM & SAM Periode Mei 2025 dan Progres Tindak Lanjut Temuan Otoritas Jasa Keuangan Tahun 2024 Posisi Juni 2025.
7. Laporan Tingkat Kesehatan Bank Periode Semester I Tahun 2025 dan Laporan Direktur Kepatuhan Periode Semester I Tahun 2025.
8. Pembahasan Laporan Profil Risiko Periode Juli 2025, pembahasan sosialisasi Peraturan Otoritas Jasa Keuangan dan Rancangan Peraturan Otoritas Jasa Keuangan, pembahasan hasil validasi *self-asessment compliance*, dan pembahasan progres pemeriksaan Otoritas Jasa Keuangan 2025.
9. Laporan Risiko *Information Technology*, progres pemeriksaan Otoritas Jasa Keuangan tahun 2025, dan *work plan for developing departmental system procedure.*
10. Laporan Profil Risiko Triwulan III Tahun 2025, sosialisasi dan rencana tindak lanjut Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2025, dan *self-asessment* Tim Pelindungan Konsumen.
11. Penginian *Recovery Plan* (RCP), dan kegiatan pengelolaan kepatuhan dan pelaporan regulator.
12. Penguatan *Business Continuity Plan* (BCP) serta capaian kegiatan dan progres kepatuhan 2025.

Laporan Singkat Pelaksanaan Kegiatan Komite Pemantau Risiko Tahun 2025

Selama tahun 2025, Komite Pemantau Risiko secara konsisten menjalankan berbagai aktivitas dalam rangka memenuhi mandat, tugas, serta tanggung jawabnya, yang dapat dijabarkan sebagai berikut:

1. Melakukan rapat dan *review* terhadap efektivitas pelaksanaan manajemen risiko dan kepatuhan Bank.
2. Melakukan rapat dan *review* atas penilaian risiko oleh Satuan Kerja Manajemen Risiko dan Laporan Kepatuhan oleh Divisi Kepatuhan, termasuk kegiatannya dalam memantau mitigasi oleh *Risk Taking Unit*.
3. Melakukan pengawasan atas pelaksanaan rekomendasi Komite oleh Satuan Kerja Manajemen Risiko dan/atau Divisi Kepatuhan.

2. Risk Register for the Operations Division and IT Division, and Audit by Financial Services Authority of Medan and Solo branch offices.
3. Risk Register for SAM Division, Financial Services Authority Regulations, and Bank Indonesia Regulations derived from the Financial Sector Development and Strengthening Law (P2SK) and their relationship to internal bank policies.
4. Risk Profile Report for Quarter I of 2025 and the 2024 Annual GCG Self-Assessment Report.
5. Risk Profile and Key Risk Indicator (KRI) Report for April 2025 and Completion of the Financial Services Authority Survey: Self-Assessment of SETARA Guidelines.
6. Risk Profile Report, HCM & SAM Risk Register for May 2025 and Progress on Follow-up of Financial Services Authority Findings for 2024 as of June 2025.
7. Bank Sound Level Report for Semester I of 2025 and Compliance Director's Report for Semester I of 2025.
8. Discussion of Risk Profile Report for July 2025, discussion of the dissemination of Financial Services Authority Regulations and Draft Financial Services Authority Regulations, discussion of the results of compliance self-assessment validation, and discussion of the progress of the 2025 Financial Services Authority audit.
9. Information Technology Risk Report, progress of Financial Services Authority audit in 2025, and work plan for developing departmental system procedures.
10. Risk Profile Report for Quarter III of 2025, dissemination and follow-up plan for Financial Services Authority Regulation No. 19 of 2025, and self-assessment of the Consumer Protection Team.
11. Update on the Recovery Plan (RCP), and compliance management activities and regulatory reporting.
12. Reinforcement of Business Continuity Plan (BCP) and achievement of compliance activities and progress in 2025.

Brief Report on Implementation of Risk Monitoring Committee's Activities in 2025

Throughout 2025, the Risk Monitoring Committee consistently carried out various activities to fulfill its mandate, duties, and responsibilities, outlined as follows:

1. Holding meetings and reviews on the effectiveness of the Bank's risk management and compliance implementation.
2. Holding meetings and reviews on risk assessments by the Risk Management Work Unit and Compliance Reports by the Compliance Division, including monitoring mitigation activities by the Risk Taking Unit.
3. Supervising the implementation of Committee recommendations by the Risk Management Work Unit and/or Compliance Division.

4. Penelaahan atas informasi risiko dan manajemen risiko Bank dalam laporan-laporan yang dipublikasikan.
5. Penelaahan kepatuhan terhadap peraturan perundang-undangan dan ketentuan yang berlaku.
6. Pelaksanaan tugas khusus dan tugas lain-lain.

Selain itu, Komite Pemantau Risiko juga telah melakukan penelaahan dan peninjauan melalui analisa laporan maupun rapat, yang hasilnya disampaikan kepada Dewan Komisaris melalui Memo Intern. Beberapa hal yang dikaji meliputi penelaahan atas profil risiko dan Laporan Kepatuhan Bank untuk Posisi Semester II Tahun 2024 dan Posisi Maret, Juni, dan September Tahun 2025. Komite juga memberikan berbagai arahan hasil penelaahan terkait profil risiko dan kepatuhan Bank untuk posisi semester II tahun 2024 dan posisi Maret, Juni, dan September tahun 2025.

Pelatihan dan/atau Peningkatan Komite Pemantau Risiko

Sepanjang tahun 2025, pengembangan kompetensi bagi Zaenal Abidin, Ph.D, dan Gunawan Tenggarahardja tercermin melalui program pelatihan serta peningkatan kompetensi Dewan Komisaris. Adapun pengembangan kompetensi bagi anggota Komite Pemantau Risiko lainnya sebagai berikut:

4. Reviewing the Bank's risk and risk management information in published reports.
5. Reviewing compliance with applicable laws and regulations.
6. Implementing special duties and other duties.

Furthermore, the Risk Monitoring Committee also conducted assessment and review through report analysis and meetings, the results of which were submitted to the Board of Commissioners through Internal Memo. Some of the matters reviewed included a review of the Bank's risk profile and Compliance Report for Semester II of 2024 and March, June, and September 2025. The Committee also provided various directives on the review results regarding the Bank's risk profile and compliance for semester II of 2024 and March, June, and September 2025.

Risk Monitoring Committee's Training and/or Development Programs

Throughout 2025, the competency developments for Zaenal Abidin, Ph.D, and Gunawan Tenggarahardja were reflected in training programs and competency development of the Board of Commissioners. Competency development for other members of the Risk Monitoring Committee is as follows:

Materi Pelatihan dan Penyelenggara **Training Materials and Organizers**	**Kehadiran** **Attendance**	
	Medi Sejati	**Taufiq Akbar**
Sharing Session "Suistainable Growth Through Digitalization and Strong Governance" – oleh Internal Bank Victoria Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally	✓	✓
Training Pembekalan Manajemen Risiko Jenjang 7 – Diselenggarakan oleh Arfaidhams Secret Briefing Training on Risk Management Level 7 – Organized by Arfaidhams Secret	✓	✓
Training Pembekalan Manajemen Risiko Jenjang 4 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia Briefing Training on Risk Management Level 4 – Indonesian Banking Development Institute	-	✓
Team Building: "Work Hard Vacation Harder" – Diselenggarakan oleh Internal Bank Victoria Team Building: "Work Hard Vacation Harder" – Organized by Bank Victoria Internally	✓	✓
Training IT Risk Management – Diselenggarakan oleh Acumen Advice Training & Consulting IT Risk Management Training – Organized by Acumen Advice Training & Consulting	-	✓

Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi merupakan komite yang terdiri dari anggota Dewan Komisaris dan Pejabat Eksekutif Bank yang membawahkan fungsi kepegawaian. Berdasarkan Surat Keputusan Komisaris, ditetapkan sebagai anggota Komite Remunerasi dan Nominasi dengan cakupan tugas, tanggung jawab, dan kewenangan untuk melakukan evaluasi, memberikan masukan dan/atau arahan atas (usulan) kebijakan remunerasi yang ditetapkan dan diterapkan Bank.

Remuneration and Nomination Committee

Remuneration and Nomination Committee is a committee consisting of members of the Board of Commissioners and Bank Executive Officers responsible for personnel functions. Members of the Remuneration and Nomination Committee are appointed based on Board of Commissioners' Decision Letter with the scope of duties, responsibilities, and authority to evaluate, provide input and/or direction on (proposed) remuneration policy established and implemented by the Bank.

Pedoman Komite Remunerasi dan Nominasi

Pedoman kerja Komite Remunerasi dan Nominasi telah ditetapkan dan diperbarui melalui Keputusan Dewan Komisaris No. 001/SK-KOM/01/24 tanggal 5 Januari 2024, yang menjadi acuan utama dalam pelaksanaan tugas serta tata tertib Komite Remunerasi dan Nominasi Bank.

Tugas dan Tanggung Jawab Komite Remunerasi dan Nominasi

Dalam mendukung fungsi pengawasan serta peningkatan tata kelola, Komite Remunerasi dan Nominasi menjalankan sejumlah tugas dan tanggung jawab yang mencakup aspek evaluasi, pemberian rekomendasi, serta pengawasan kebijakan, antara lain:

1. Kebijakan Nominasi:
   a. Menyusun dan merekomendasikan sistem dan prosedur pemilihan atau penggantian anggota Dewan Komisaris dan Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS.
   b. Memberikan rekomendasi tentang calon anggota Dewan Komisaris dan/atau Direksi kepada Dewan Komisaris untuk disampaikan kepada RUPS.
   c. Memberikan rekomendasi kepada Dewan Komisaris mengenai pihak independen yang akan menjadi anggota Komite Audit serta anggota Komite Pemantau Risiko.
   d. Menyusun mekanisme dan melakukan penilaian kinerja Direksi dan Dewan Komisaris.
2. Kebijakan Remunerasi:
   a. Menyusun dan mengevaluasi remunerasi untuk anggota Dewan Komisaris, Direksi, dan Pejabat Eksekutif hingga 1 (satu) tingkat di bawah Direksi.
   b. Memberikan rekomendasi kepada Dewan Komisaris mengenai kebijakan remunerasi untuk Dewan Komisaris dan Direksi yang akan disampaikan kepada RUPS, serta kebijakan remunerasi untuk Pejabat Eksekutif hingga 1 (satu) tingkat di bawah Direksi yang akan disampaikan kepada Direksi.
   c. Dalam pelaksanaan tugas remunerasi, memperhatikan kinerja keuangan, pemenuhan cadangan sesuai peraturan perundang-undangan, prestasi kerja individu, kewajaran dengan *peer group*, dan pertimbangan terhadap sasaran dan strategi jangka panjang Bank.
3. Tugas Lainnya:
   a. Membantu Dewan Komisaris dalam memberikan rekomendasi tentang jumlah anggota Dewan Komisaris dan Direksi.

Remuneration and Nomination Committee Charter

The Remuneration and Nomination Committee Charter is established and updated through Board of Commissioners' Decision No. 001/SK-KOM/01/24 dated 5 January 2024, which serves as the primary reference for implementing duties and procedures of the Remuneration and Nomination Committee of the Bank.

Duties and Responsibilities of Remuneration and Nomination Committee

To support supervisory function and improve governance, the Remuneration and Nomination Committee carries out a number of duties and responsibilities, including evaluation, recommendation, and policy oversight, including:

1. Nomination Policy:
   a. To prepare and recommend system and procedure of selection or replacement of members of Board of Commissioners and Board of Directors to the Board of Commissioners to be proposed to the GMS.
   b. To give recommendations about the candidates for the Board of Commissioners and/or Board of Directors to the Board of Commissioners to be proposed to the GMS.
   c. To give recommendations to the Board of Commissioners on independent party who will become member of Audit Committee and member of Risk Monitoring Committee.
   d. To develop mechanisms and assess the performance of the Board of Directors and Board of Commissioners.
2. Remuneration Policy:
   a. To prepare and evaluate remuneration for members of the Board of Commissioners, Board of Directors, and Executive Officers up to 1 (one) level below the Board of Directors.
   b. To give recommendations to the Board of Commissioners on remuneration policy for the Board of Commissioners and Board of Directors to be proposed to the GMS, and remuneration policy for Executive Officers up to 1 (one) level below the Board of Directors to be proposed to the Board of Directors.
   c. In performing remuneration duty, consider financial performance, fulfillment of reserve in accordance with laws and regulations, individual work achievement, fairness with peer group, and consideration of the Bank's long-term goals and strategies.
3. Other Duties:
   a. To assist the Board of Commissioners in giving recommendations about the number of members of the Board of Commissioners and Board of Directors.

b. Membantu Direksi dalam mengevaluasi sistem *Human Capital Management & General Affair*, serta kebijakan pengembangan HC, termasuk rekrutmen, asesmen, peningkatan kompetensi, evaluasi, promosi, demosi, terminasi, suksesi, seleksi, dan tugas lainnya.

b. To assist the Board of Directors in evaluating the Human Capital Management & General Affair system, and HC development policy, including recruitment, assessment, competency development, evaluation, promotion, demotion, termination, succession, selection, and other duties.

Persyaratan Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi paling sedikit terdiri atas seorang Komisaris Independen yang merangkap sebagai ketua, seorang Komisaris Non-Independen, serta seorang Pejabat Eksekutif yang membawahkan fungsi HC atau 1 (satu) orang perwakilan pegawai Bank. Pejabat Eksekutif atau perwakilan pegawai yang menjadi anggota Komite Remunerasi dan Nominasi wajib memiliki pengetahuan dan pemahaman yang memadai mengenai sistem remunerasi dan/atau sistem nominasi serta rencana suksesi (*succession plan*) Bank.

Requirements for the Remuneration and Nomination Committee

Remuneration and Nomination Committee shall consist of at least one Independent Commissioner concurrently as chairman, one Non-Independent Commissioner, and one Executive Officer in charge of HC or 1 (one) employee representative of the Bank. Executive Officer or employee representative serving as Remuneration and Nomination Committee member shall have adequate knowledge and understanding of the Bank's remuneration and/or nomination system and succession plan.

Komposisi dan Masa Jabatan Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi minimal beranggotakan 3 (tiga) orang yang terdiri dari Komisaris Independen sebagai ketua, anggota Komisaris, serta Pejabat Eksekutif yang membawahkan Divisi *Human Capital Management* atau perwakilan pegawai. Masa jabatan Komite Remunerasi dan Nominasi ditetapkan mengikuti masa jabatan Dewan Komisaris, dan dapat diperpanjang melalui pengangkatan kembali untuk periode berikutnya sesuai ketentuan yang berlaku.

Per 31 Desember 2025, komposisi Komite Remunerasi dan Nominasi Bank yang diangkat berdasarkan Surat Keputusan Direksi No. 002C/SK-DIR/11/22 tanggal 9 November 2022, untuk masa jabatan 2022-sekarang sebagai berikut:

Composition and Term of Office of the Remuneration and Nomination Committee

The Remuneration and Nomination Committee consists of at least 3 (three) members comprising Independent Commissioner as chairman, member of the Board of Commissioners, and Executive Officer in charge of Human Capital Management Division or an employee representative. The term of office of Remuneration and Nomination Committee is determined by the Board of Commissioners and can be extended through reappointment for subsequent period in accordance with applicable regulations.

As of 31 December 2025, the composition of the Bank's Remuneration and Nomination Committee, appointed based on Board of Directors' Decision Letter No. 002C/SK-DIR/11/22 dated 9 November 2022 for the 2022-present term of office, is as follows:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Gunawan Tenggarahardja	Ketua Chairman	Komisaris Independen Independent Commissioner	Perbankan Banking
Sia Leng Ho	Anggota Member	Komisaris Commissioner	Bisnis Business
Syahda Candra	Anggota Member	Kepala Divisi *Human Capital Management & General Affair* Head of Human Capital Management & General Affair Division	Human Capital



Profil Komite Remunerasi dan Nominasi
Remuneration and Nomination Committee's Profile

GUNAWAN TENGGARAHARDJA

Ketua
Chairman

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

Keputusan Direksi No. 002C/SK-DIR/11/22 tanggal 9 November 2022 (2022-sekarang).

Board of Directors' Decision No. 002C/SK-DIR/11/22 dated 9 November 2022 (2022-present).

Profil dapat dilihat pada profil Dewan Komisaris.
Profile can be seen in the Board of Commissioners' profile chapter.

SIA LENG HO

Anggota
Member

Dasar Pengangkatan dan Periode Menjabat

Basis of Appointment and Term of Office

Keputusan Direksi No. 002C/SK-DIR/11/22 tanggal 9 November 2022 (2022-sekarang).

Board of Directors' Decision No. 002C/SK-DIR/11/22 dated 9 November 2022 (2022-present).

Profil dapat dilihat pada profil Dewan Komisaris.
Profile can be seen in the Board of Commissioners' profile chapter.

SYAHDA CANDRA

Anggota
Member

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
52 tahun / 52 years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 002C/SK-DIR/11/22 tanggal 9 November 2022 (2022-sekarang).

Riwayat Pendidikan
Sarjana Psikologi dari Universitas Persada Indonesia YAI, Jakarta (1998).

Rangkap Jabatan Saat Ini
Di dalam Bank Victoria:
Kepala Divisi *Human Capital Management & General Affair* Bank Victoria (sejak 2019).

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan Sebelumnya
- *Senior Staff Human Resource Department (Recruitment and Man Power)* PT Bank Ekonomi Raharja Tbk (1997-2000).
- *Assistant Manager Human Resource Department* PT Hawaii Confectionery Factory (2001-2002).
- *Supervisor Human Resource Department* PT JS Multi Collection (2002-2003).
- Menjabat di Bank Victoria sebagai:
  - Kepala Divisi *Human Resource and General Affair* (2003-2012).
  - Kepala Divisi *Human Capital Management* (2012-2017).
  - Kepala Divisi *Human Resource and General Affair* (2019).

Sertifikasi
- Sertifikasi bidang Manajemen Risiko Perbankan Jenjang 5 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).
- Sertifikasi *Manager* SDM dari Lembaga Sertifikasi Profesi Manajemen Sumber Daya Manusia (2025-2028).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 002C/SK-DIR/11/22 dated 9 November 2022 (2022-now).

Education
Bachelor of Psychology from Persada Indonesia YAI University, Jakarta (1998).

Current Concurrent Positions
In Bank Victoria:
Head of Human Capital Management & General Affair Division of Bank Victoria (since 2019).

Outside of Bank Victoria:
None.

History of Previous Positions
- Senior Staff of Human Resource Department (Recruitment and Manpower) of PT Bank Ekonomi Raharja Tbk (1997-2000).
- Assistant Manager of Human Resource Department of PT Hawaii Confectionery Factory (2001-2002).
- Supervisor of Human Resource Department of PT JS Multi Collection (2002-2003).
- Held positions at Bank Victoria as:
  - Head of Human Resources and General Affair Division (2003-2012).
  - Head of Human Capital Management Division (2012-2017).
  - Head of Human Resources and General Affair Division (2019).

Certification
- Certification of Banking Risk Management Level 5 from Banking Profession Certification Institute (2024-2027).
- Certification of HR Manager from Human Resource Management Professional Certification Institute (2025-2028).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Independensi Komite Remunerasi dan Nominasi

Anggota Remunerasi dan Nominasi ditetapkan dengan memperhatikan pemenuhan prinsip independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali.
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung.
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi.
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Remunerasi dan Nominasi.
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Independency of Remuneration and Nomination Committee

Members of the Remuneration and Nomination Committee are appointed by considering the following independence principles:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders.
2. Does not have share ownership relationship in the Bank, either directly or indirectly.
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company.
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Remuneration and Nomination Committee.
5. Does not hold position as administrator of political party, state, and government.

Rapat Komite Remunerasi dan Nominasi

Komite Remunerasi dan Nominasi melaksanakan rapat sekurang-kurangnya sekali setiap 3 (tiga) bulan, baik secara tatap muka, media elektronik, maupun keputusan sirkular. Rapat dapat diselenggarakan apabila dihadiri oleh lebih dari separuh dari jumlah anggota. Keputusan rapat diambil berdasarkan musyawarah mufakat atau suara terbanyak, dan seluruh hasil rapat dituangkan dalam risalah serta dilaporkan kepada Dewan Komisaris.

Rekapitulasi kehadiran masing-masing anggota Komite Remunerasi dan Nominasi dalam rapat di tahun 2025 sebagai berikut:

Remuneration and Nomination Committee's Meeting

The Remuneration and Nomination Committee holds meetings at least once every 3 (three) months, either in person, electronically, or through circular decisions. Meeting can be held if attended by more than half of the total members. Meeting decisions are made by consensus or majority vote, and all meeting results are recorded in minutes and reported to the Board of Commissioners.

The summary of attendance of each member of Remuneration and Nomination Committee at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Gunawan Tenggarahardja	Ketua Chairman	7	7	100.00
Sia Leng Ho	Anggota Member	7	7	100.00
Syahda Candra	Anggota Member	7	7	100.00

Agenda Rapat Komite Remunerasi dan Nominasi

Rapat Komite Remunerasi dan Nominasi membahas berbagai agenda, antara lain:

1. Struktur organisasi.
2. Rekomendasi pencalonan Dewan Komisaris dan Direksi.
3. Kebijakan Pedoman Gratifikasi/Bonus Tahun 2024-2025 bagi Pengurus dan Pegawai Bank untuk rekomendasi kepada Dewan Komisaris.
4. Kebijakan kenaikan remunerasi bagi pengurus dan karyawan.
5. Perubahan struktur organisasi.
6. Penggantian anggota Komite Audit dan anggota Komite Pemantau Risiko untuk rekomendasi kepada Dewan Komisaris.
7. Evaluasi dan perubahan struktur organisasi.

Laporan Singkat Pelaksanaan Kegiatan Komite Remunerasi dan Nominasi Tahun 2025

Selama tahun 2025, Komite Nominasi dan Remunerasi melaksanakan tugas dan tanggung jawab serta memberikan beberapa rekomendasi di antaranya sebagai berikut:

1. Struktur organisasi.
2. Rekomendasi pencalonan Dewan Komisaris dan Direksi.
3. Kebijakan Pedoman Gratifikasi/Bonus Tahun 2024-2025 bagi Pengurus dan Pegawai Bank untuk rekomendasi kepada Dewan Komisaris.

Remuneration and Nomination Committee's Meeting Agenda

Remuneration and Nomination Committee meetings discuss various agenda items, including:

1. Organizational structure.
2. Recommendations for nominations to the Board of Commissioners and Board of Directors.
3. Policy on the 2024-2025 Gratification/Bonus Guidelines for the Bank's Management and Employees for recommendation to the Board of Commissioners.
4. Policy on remuneration increase for the management and employees.
5. Changes to the organizational structure.
6. Replacement of Audit Committee members and Risk Monitoring Committee members for recommendation to the Board of Commissioners.
7. Evaluation and changes to the organizational structure.

Brief Report on Implementation of Remuneration and Nomination Committee's Activities in 2025

Throughout 2025, the Nomination and Remuneration Committee carried out its duties and responsibilities and provided several recommendations, including the following:

1. Organizational structure.
2. Recommendations for nominations to the Board of Commissioners and Board of Directors.
3. Policy on the 2024-2025 Gratification/Bonus Guidelines for the Bank's Management and Employees for recommendation to the Board of Commissioners.

4. Kebijakan kenaikan remunerasi bagi pengurus dan karyawan.
5. Perubahan struktur organisasi.
6. Penggantian anggota Komite Audit dan anggota Komite Pemantau Risiko untuk rekomendasi kepada Dewan Komisaris.
7. Evaluasi dan perubahan struktur organisasi.

Pelatihan dan/atau Peningkatan Komite Remunerasi dan Nominasi

Sepanjang tahun 2025, pengembangan kompetensi bagi Gunawan Tenggarahardja dan Sia Leng Ho tercermin melalui program pelatihan serta peningkatan kompetensi Dewan Komisaris. Adapun pengembangan kompetensi bagi Ibu Syahda Candra sebagai berikut:

1. *Sharing Session "Suistainable Growth Through Digitalization and Strong Governance"* – Diselenggarakan oleh Internal Bank Victoria.
2. *Training Refreshment* Manajemen Risiko Jenjang 5 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
3. *Training Talkshow Women's Leadership* – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
4. Training *Idea Talks Riset* OJK Institute Volume 8 Tahun 2025 – Diselenggarakan oleh Otoritas Jasa Keuangan.
5. Webinar "Memutus Mata Rantai *Scam*: Sinergi dan Strategi Perlindungan Konsumen Sektor Keuangan" – Diselenggarakan oleh OJK Institute.
6. Uji Sertifikasi *Manager* Sumber Daya Manusia – Diselenggarakan oleh Lembaga Pengembangan Manajemen Sumber Daya Manusia.
7. *Training Refreshment Financial Integrity Rating* (FIR) 2025 dan Tindak Pidana Pencucian Uang Pidana Pencucian Uang – Diselenggarakan oleh Andara Sarana.
8. *Training Human Capital Beyond & Summit* (IHCBS) Uang – Diselenggarakan oleh QuBisa.
9. *Team Building: "Together We Grow, Together We Go"* – Diselenggarakan oleh Internal Bank Victoria.
10. *Training Building a Fraud-Resilent Bank: From Detection to Response* – Diselenggarakan oleh Internal Bank Victoria.
11. *Training* Bahaya Pinjaman *Online* – Diselenggarakan oleh Internal Bank Victoria.
12. *Training: Expert Sharing Session* "Transformasi Digital IT Perbankan – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
13. *Training* Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi – Diselenggarakan oleh Victoria Institute.
14. *Training Indonesia Marketing Convention* – Diselenggarakan oleh MarkPlus.
15. *Training Driving Branch Productivity Through Effective Leadership* – Diselenggarakan oleh Edcore Indonesia.

4. Policy on remuneration increase for the management and employees.
5. Changes to the organizational structure.
6. Replacement of Audit Committee members and Risk Monitoring Committee members for recommendation to the Board of Commissioners.
7. Evaluation and changes to the organizational structure.

Remuneration and Nomination Committee's Training and/or Development Programs

Throughout 2025, the competency developments for Gunawan Tenggarahardja and Sia Leng Ho were reflected in training programs and competency development of the Board of Commissioners. Competency development for Ms. Syahda Candra was as follows:

1. Sharing Session "Suistainable Growth Through Digitalization and Strong Governance" – Organized by Bank Victoria Internally.
2. Training Refreshment of Risk Management Level 5 – Organized by Indonesian Banking Development Institute.
3. Training Talkshow Women's Leadership – Organized by Indonesian Banking Development Institute.
4. Training Idea Talks of OJK Institute Research Volume 8 of 2025 – Organized by Financial Services Authority.
5. Webinar "Breaking the Chain of Scams: Synergy and Consumer Protection Strategy in the Financial Sector" – Organized by OJK Institute.
6. Certification Test of Human Resources Manager – Organized by Human Resource Management Development Institute.
7. Training Refreshment Financial Integrity Rating (FIR) 2025 and Money Laundering Crimes – Organized by Andara Sarana.
8. Training Human Capital Beyond & Summit (IHCBS) Money – Organized by QuBisa.
9. Team Building: "Together We Grow, Together We Go" – Organized by Bank Victoria.
10. Training Building a Fraud-Resilent Bank: From Detection to Response Training – Organized by Bank Victoria.
11. Training on Online Loan Dangers – Organized by Bank Victoria.
12. Training: Expert Sharing Session "Digital Transformation of Banking IT" - Organized by Indonesian Banking Development Institute.
13. Training on Strategy and Implementation of Consumer Protection and Personal Data - Organized by Victoria Institute.
14. Training Indonesia Marketing Convention - Organized by MarkPlus.
15. Training Driving Branch Productivity Through Effective Leadership - Organized by Edcore Indonesia.

Komite Audit

Komite Audit merupakan salah satu perangkat Dewan Komisaris Bank yang dibentuk berdasarkan keputusan Dewan Komisaris yang bekerja secara kolektif dan berfungsi membantu serta bertanggung jawab kepada Dewan Komisaris.

Pedoman Komite Audit

Komite Audit menjalankan tugas dan tanggung jawabnya berlandaskan Piagam Komite Audit yang telah diperbarui melalui Keputusan Dewan Komisaris No. 001/SK-KOM/06/25 tanggal 18 Juni 2025 tentang Pedoman dan Tata Tertib Kerja Komite Audit PT Bank Victoria International Tbk.

Tugas dan Tanggung Jawab Komite Audit

Komite Audit telah melakukan tindakan sebagaimana dimaksud dalam Pasal 10 Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit terkait dengan penyusunan dan penerbitan Laporan Keuangan Tahunan per 31 Desember 2025 dan Laporan Tahunan 2025. Dalam pelaksanaan tugas tersebut, Komite Audit telah melaksanakan pengkajian terhadap Laporan Keuangan, melakukan pembahasan dengan manajemen, memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan akuntan publik yang didasarkan pada independensi, ruang lingkup penugasan, dan imbalan jasa serta berkomunikasi dengan akuntan publik yang ditunjuk untuk audit Laporan Keuangan Tahunan 2025. Sebagai bagian dari proses tersebut, Komite Audit telah menyelenggarakan rapat internal serta rapat dengan akuntan publik dan pihak terkait lainnya.

Adapun tugas dan tanggung jawab Komite Audit meliputi hal-hal berikut:

1. Melakukan penelaahan dan klarifikasi atas informasi keuangan yang akan dikeluarkan Bank atau perusahaan publik kepada publik dan/atau pihak otoritas.
2. Melakukan seleksi, penunjukan, dan pengawasan pekerjaan auditor independen.
3. Mengevaluasi efektivitas pelaksanaan pekerjaan auditor independen.
4. Melakukan seleksi, penunjukan, dan pengawasan pekerjaan auditor independen terkait kinerja SKAI 3 (tiga) tahunan.
5. Melakukan penelaahan atas pelaksanaan pemeriksaan oleh auditor internal dan mengawasi pelaksanaan tindak lanjut oleh Direksi atas temuan auditor internal.
6. Mengevaluasi efektivitas pengendalian internal.
7. Memastikan kegiatan operasi Bank dijalankan dengan mematuhi peraturan perundang-undangan yang berlaku.

Audit Committee

Audit Committee is a component of the Bank's Board of Commissioners, established based on the Board of Commissioners' decision, that works collectively and assists and reports to the Board of Commissioners.

Audit Committee Charter

The Audit Committee carries out its duties and responsibilities based on Audit Committee Charter, updated through Board of Commissioners' Decision No. 001/SK-KOM/06/25 dated 18 June 2025 on the Charter and Work Guidelines of Audit Committee of PT Bank Victoria International Tbk.

Duties and Responsibilities of Audit Committee

The Audit Committee has taken actions as referred to in Article 10 of Financial Services Authority Regulation No. 55/POJK.04/2015 on Establishment and Guideline for Duty Implementation of Audit Committee related to the preparation and issuance of Annual Financial Statements as of 31 December 2025 and the 2025 Annual Report. In performing these duties, the Audit Committee reviewed the Financial Statements, held discussions with management, provided recommendations to the Board of Commissioners regarding the appointment of public accountant based on independence, scope of assignment, and service fees, and communicated with the public accountant appointed to audit the 2025 Annual Financial Statements. As part of such process, the Audit Committee held internal meetings and meetings with public accountants and other related parties.

Duties and responsibilities of the Audit Committee include the following:

1. Reviewing and clarifying the financial information to be issued by the Bank or public company to the public and/or authorities.
2. Selecting, appointing, and monitoring independent auditor's work.
3. Evaluating the effectiveness of implementation of independent auditor function.
4. Selecting, appointing, and monitoring independent auditor's work related to triennial SKAI performances 3 (three) years.
5. Reviewing the audit conducted by internal auditor and supervising the follow-up conducted by the Board of Directors on internal auditor findings.
6. Evaluating the effectiveness of internal control.
7. Ensuring the Bank's operational activities are carried out in compliance with the applicable laws and regulations.

8. Melakukan koordinasi dengan Komite Manajemen Risiko dalam hal pemantauan risiko dan mitigasinya.
9. Melakukan penilaian sendiri terhadap efektivitas pelaksanaan tugas Komite Audit.

Komite Audit juga mempunyai wewenang sebagaimana diatur dalam Pasal 11 Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 di antaranya:
1. Mengakses dokumen, data, dan informasi Bank tentang karyawan, dana, aset, dan sumber daya Bank yang diperlukan.
2. Berkomunikasi langsung dengan karyawan, termasuk Direksi dan pihak yang menjalankan fungsi audit internal, manajemen risiko, dan akuntan terkait tugas dan tanggung jawab Komite Audit.
3. Melibatkan pihak independen di luar anggota Komite Audit yang diperlukan untuk membantu pelaksanaan tugasnya (jika diperlukan).
4. Melakukan kewenangan lain yang diberikan oleh Dewan Komisaris.

Dalam menjalankan wewenangnya, Komite Audit tidak mengalami kendala atau pembatasan, sehingga dapat menjalankan tugasnya secara optimal. Namun, jika di masa mendatang terdapat kendala atau hambatan yang menghalangi pelaksanaan wewenangnya, Komite Audit akan segera melaporkannya kepada Dewan Komisaris dan berkoordinasi untuk mencari solusi yang tepat. Dengan demikian, Komite memastikan bahwa tugas dan tanggung jawabnya tetap dapat dijalankan secara efektif, sesuai dengan prinsip GCG.

Persyaratan Komite Audit

Keanggotaan Komite Audit wajib seluruhnya independen, yang paling sedikit terdiri dari:
1. 1 (satu) orang Komisaris Independen yang merangkap sebagai ketua.
2. 1 (satu) orang pihak independen yang memiliki keahlian di bidang keuangan atau bidang akuntansi.
3. 1 (satu) orang pihak independen yang memiliki keahlian di bidang hukum atau bidang perbankan.

Anggota Komite Audit yang berasal dari pihak independen dinilai memiliki keahlian di bidang keuangan atau bidang akuntansi dalam hal memenuhi kriteria:
1. Memiliki sertifikat kompetensi di bidang keuangan dan/atau bidang akuntansi yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
2. Memiliki pengalaman kerja paling sedikit 5 (lima) tahun di bidang keuangan dan/atau bidang akuntansi.

Anggota Komite Audit yang berasal dari pihak independen dinilai memiliki keahlian di bidang hukum atau bidang perbankan dalam hal memenuhi kriteria:

8. Coordinating with the Risk Management Committee in risk monitoring and mitigation.
9. Conducting self-assessment on the effectiveness of implementation of Audit Committee's duties.

The Audit Committee also has the authority as stipulated in Article 11 of Financial Services Authority Regulation No. 55/POJK.04/2015, including:
1. Access the Bank's document, data, and information about Bank's employees, funds, assets, and resources required.
2. Communicate directly with employees, including Board of Directors and parties carrying out functions of internal audit, risk management, and accountant, related to the duties and responsibilities of the Audit Committee.
3. Involve independent parties outside the Audit Committee members who are required to assist in performing their duties (if necessary).
4. Perform other authorities assigned by the Board of Commissioners.

In exercising its authority, the Audit Committee did not experience any obstacles or restrictions, and therefore, it could perform its duties optimally. However, in the event of any obstacles or barriers in the future that hinder the implementation of its authority, the Audit Committee will immediately report it to the Board of Commissioners and coordinate to find the right solution. Thus, the Committee ensures that its duties and responsibilities can still be carried out effectively, in accordance with GCG principles.

Requirements for the Audit Committee

The composition of Audit Committee shall be entirely independent, consisting of at least:
1. 1 (one) Independent Commissioner concurrently as chairman.
2. 1 (one) independent party with expertise in finance or accounting.
3. 1 (one) independent party with expertise in law or banking.

Member of Audit Committee from independent party is deemed to have expertise in finance or accounting, as defined by the following criteria:
1. Has competency certificate in finance and/or accounting issued by a recognized domestic or international institution.
2. Has at least 5 (five) years of work experience in finance and/or accounting.

Member of Audit Committee from independent party is deemed to have expertise in law or banking, as defined by the following criteria:

1. Memiliki sertifikat kompetensi di bidang hukum, antara lain legal auditor, notaris, dan/atau ahli kontrak yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
2. Memiliki sertifikat kompetensi di bidang perbankan, antara lain manajemen risiko sebagaimana yang berlaku bagi Dewan Komisaris, kepatuhan, akuntan publik, akuntan, *general banking*, *wealth management*, perencanaan strategis, teknologi informasi, treasuri, audit terkait perbankan, *corporate finance*, sistem pembayaran dan pengelolaan uang Rupiah, perlindungan konsumen, dan aspek pasar modal, yang diterbitkan oleh lembaga domestik maupun lembaga internasional yang diakui.
3. Memiliki pengalaman kerja paling sedikit 5 (lima) tahun di bidang hukum dan/atau bidang perbankan.

Komposisi dan Masa Jabatan Komite Audit

Komite Audit terdiri dari sekurang-kurangnya 3 (tiga) anggota independen, yang mencakup Komisaris Independen sebagai ketua serta pihak independen dengan keahlian di bidang keuangan, akuntansi, hukum, atau perbankan. Masa tugas anggota mengikuti masa jabatan Dewan Komisaris dan dapat diperpanjang sesuai ketentuan. Dalam menjalankan fungsinya, Komite Audit didukung oleh staf atau sekretaris yang ditunjuk, sementara anggota independen berhak atas honorarium sesuai keputusan Dewan Komisaris dan peraturan yang berlaku.

Per 31 Desember 2025, komposisi Komite Audit Bank yang diangkat berdasarkan Surat Keputusan Direksi No. 004/SK-DIR/08/25 tanggal 1 Agustus 2025, untuk masa jabatan 2025-sekarang sebagai berikut:

1. Has competency certificate in law, including legal audit, notary, and/or contract expert, issued by a recognized domestic or international institution.
2. Has competency certificate in banking, including risk management as applicable to the Board of Commissioners, compliance, public accounting, general banking, wealth management, strategic planning, information technology, treasury, banking-related audits, corporate finance, payment system and Rupiah currency management, consumer protection, and capital market aspect, issued by a recognized domestic or international institution.
3. Has at least 5 (five) years of work experience in law and/or banking.

Composition and Term of Office of the Audit Committee

The Audit Committee consists of at least 3 (three) independent members, including Independent Commissioner as chair and independent party with expertise in finance, accounting, law, or banking. Members' term of office follows the term of office of the Board of Commissioners and can be extended as required. In carrying out its functions, Audit Committee is supported by appointed staff or a secretary, while independent members are entitled to honorarium in accordance with the Board of Commissioners' decision and applicable regulations.

As of 31 December 2025, the composition of the Bank's Audit Committee, appointed based on Board of Directors' Decision Letter No. 004/SK-DIR/08/25 dated 1 August 2025, for the 2025-present term of office, is as follows:

Nama Name	Posisi di Komite Position in the Committee	Jabatan di Bank Position at the Bank	Keahlian Expertise
Zaenal Abidin Ph.D	Ketua Chairman	Komisaris Utama Independen Independent President Commissioner	Perbankan, Manajemen Risiko, dan GCG Banking, Risk Management, and GCG
Medi Sejati	Anggota Member	Pihak Independen Independent Party	Perbankan dan Audit Banking and Audit
Taufiq Akbar	Anggota Member	Pihak Independen Independent Party	Keuangan, Perbankan, dan Manajemen Risiko Finance, Banking, and Risk Management

Bank menunjuk 1 (satu) Komisaris Independen sesuai ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Pasal 64 ayat 4, sebagai Ketua Komite Audit merangkap sebagai anggota Komite Audit. Meskipun Ketua Komite Audit juga menjabat sebagai Komisaris Utama Independen, Bank memastikan pelaksanaan tugas dan tanggung jawab dijalankan secara profesional dan independen sesuai prinsip GCG, sehingga integritas serta objektivitas dalam fungsi pengawasan tetap terjaga.

The Bank appointed 1 (one) Independent Commissioner in accordance with Financial Services Authority Regulation No. 17 Article 64 paragraph 4, as the Chairman of Audit Committee and concurrently serving as member of Audit Committee. Though the Chairman of Audit Committee also serves as Independent President Commissioner, the Bank ensures that the duties and responsibilities are carried out professionally and independently in accordance with GCG principles, thereby maintaining integrity and objectivity in supervisory function.

Profil Komite Audit

Informasi mengenai profil Komite Audit telah disampaikan pada Profil Dewan Komisaris serta Profil Komite Pemantau Risiko sebagai bagian dari transparansi tata kelola perusahaan.

Independensi Komite Audit

Anggota Komite Audit melaksanakan tugas secara independen tanpa intervensi dari pihak mana pun, dengan tetap menjaga objektivitas dan integritas dalam setiap pengambilan keputusan, sebagaimana tercermin dalam pemenuhan prinsip independensi berikut:

1. Tidak memiliki hubungan keuangan dengan Dewan Komisaris, Direksi, serta Pemegang Saham Utama dan Pengendali.
2. Tidak memiliki hubungan kepemilikan saham di Bank, baik secara langsung maupun tidak langsung.
3. Tidak memiliki hubungan kepengurusan di Bank, Entitas Anak, maupun perusahaan afiliasi.
4. Tidak memiliki hubungan keluarga dengan Dewan Komisaris, Direksi, Pemegang Saham Utama dan Pengendali, dan/atau sesama anggota Komite Audit.
5. Tidak menjabat sebagai pengurus partai politik, pejabat, dan pemerintah.

Rapat Komite Audit

Komite Audit menyelenggarakan rapat sedikitnya sekali sebulan atau sesuai kebutuhan, dengan usulan dapat diajukan oleh Sekretaris maupun anggota. Rapat hanya dihadiri anggota Komite Audit dan pihak yang diundang, termasuk SKAI, Anti-*Fraud* & *ICOFR* Departemen, auditor eksternal, atau narasumber lain yang relevan. Rapat sah apabila dihadiri minimal 51% anggota, termasuk Komisaris Independen dan pihak independen, dengan keputusan diambil melalui musyawarah mufakat atau suara terbanyak jika mufakat tidak tercapai.

Rekapitulasi kehadiran masing-masing anggota Komite Audit dalam rapat di tahun 2025 sebagai berikut:

Audit Committee's Profile

Information on Audit Committee profile is presented in the Board of Commissioners Profile and Risk Monitoring Committee Profile as part of corporate governance transparency.

Independency of the Audit Committee

Members of the Audit Committee carry out their duties independently without intervention from any party, while maintaining objectivity and integrity in all decision-making, as reflected in the following independence principles:

1. Does not have financial relationship with the Board of Commissioners, Board of Directors, and Main and Controlling Shareholders.
2. Does not have share ownership relationship in the Bank, either directly or indirectly.
3. Does not have management relationship in the Bank, Subsidiary, and affiliated company.
4. Does not have family relationship with the Board of Commissioners, Board of Directors, Main and Controlling Shareholders, and/or among members of Audit Committee.
5. Does not hold position as administrator of political party, state, and government.

Audit Committee's Meeting

The Audit Committee holds meetings at least once a month or as necessary, with proposals submitted by the Secretary or members. Meetings are only attended by Audit Committee members and invited parties, including SKAI, Anti-Fraud & ICOFR Department, external auditors, or other relevant sources. A meeting is valid if attended by at least 51% of members, including Independent Commissioners and independent parties, with decisions made by consensus or by majority vote in the event consensus is not reached.

The summary of attendance of each member of Audit Committee at meetings in 2025 is as follows:

Nama Name	Jabatan Position	Total Rapat Total Meetings	Total Kehadiran Total Attendance	Tingkat Kehadiran Attendance Rate (%)
Zaenal Abidin Ph.D	Ketua Chairman	13	13	100.00
Medi Sejati	Anggota Member	13	13	100.00
Taufiq Akbar*	Anggota Member	5	5	100.00
Yozef Abdulrachman*	Anggota Member	8	8	100.00

* Per 1 Agustus 2025, telah dilakukan perubahan keanggotaan Komite Pemantau Risiko, di mana Bapak Yozef Abdulrachman tidak lagi menjabat sebagai anggota Komite Pemantau Risiko dan posisinya digantikan oleh Bapak Taufiq Akbar. Perubahan tersebut dilakukan sesuai dengan ketentuan dan keputusan yang berlaku.

As of 1 August 2025, changes were made to the composition of the Audit Committee. Mr. Yozef Abdulrachman no longer served as member of the Audit Committee and his position was replaced by Mr. Taufiq Akbar. These changes were made in accordance with applicable regulations and decisions.

Agenda Rapat Komite Audit

Rapat Komite Audit membahas berbagai agenda, antara lain:

1. Realisasi audit tahun 2024 dan rencana kerja SKAI tahun 2025.
2. Pembahasan hasil komunikasi SKAI dengan Otoritas Jasa Keuangan.
3. Pembahasan *Management Letter* KAP EY Tahun 2024.
4. *Exit meeting* audit oleh KAP EY untuk Laporan Keuangan Bank Periode 31 Desember 2024.
5. Realisasi audit triwulan I 2025 dan pemaparan Departemen Anti-*Fraud* dan *Internal Control over Financial Reporting* (ICOFR).
6. Progres audit posisi Mei 2025.
7. Progres audit posisi Juni 2025.
8. Realisasi audit sampai dengan triwulan II 2025.
9. Realisasi audit posisi Agustus 2025.
10. Progres audit SKAI posisi September 2025, tindak lanjut hasil temuan, dan hal-hal yang menjadi perhatian.
11. Realisasi audit triwulan III 2025, tindak lanjut hasil temuan, dan hal-hal yang menjadi perhatian.
12. *Kick off meeting* audit KAP EY.
13. Progres audit posisi Desember 2025 dan integritas pelaporan keuangan Bank - ICOFR.

Laporan Singkat Pelaksanaan Kegiatan Komite Audit Tahun 2025

Sepanjang tahun 2025, Komite Audit secara konsisten menjalankan berbagai aktivitas sebagai wujud nyata pelaksanaan fungsi, peran, serta tanggung jawab yang diuraikan sebagai berikut:

1. Membuat Laporan Tahunan Komite Audit.
2. Menginikan Piagam dan Tata Tertib Kerja Komite Audit.
3. Melakukan evaluasi pelaksanaan jasa audit oleh KAP EY atas Laporan Keuangan Bank Victoria International Tbk Periode 31 Desember 2024.
4. Me-*review* Laporan Pelaksanaan Pokok-Pokok Hasil Audit Intern Semester I dan II 2025.
5. Membuat rekomendasi Komite Audit kepada Dewan Komisaris atas penunjukkan akuntan publik/kantor akuntan publik untuk jasa audit Laporan Keuangan historis Bank Victoria periode 31 Desember 2025.
6. Melakukan *self-assessment* GCG terkait pelaksanaan fungsi Komite Audit semester II 2024 dan semester I 2025.
7. Menyusun rencana kerja Komite Audit.

Di samping itu, Komite Audit juga melaksanakan penelaahan dan evaluasi melalui analisis laporan serta penyelenggaraan rapat, dengan hasil kajian yang kemudian disampaikan kepada Dewan Komisaris dalam bentuk Memo Internal, antara lain mencakup hal-hal terkait:

1. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 5 (lima) objek pemeriksaan (area dan cabang).

Audit Committee's Meeting Agenda

Audit Committee meetings discuss various agenda items, including:

1. Audit realization in 2024 and SKAI work plan for 2025.
2. Discussion of the results of SKAI communication with Financial Services Authority.
3. Discussion of the 2024 KAP EY Management Letter.
4. Exit meeting of audit by KAP EY for the Bank's Financial Statements for the period 31 December 2024.
5. Audit realization for quarter I of 2025 and presentation by Anti-Fraud and Internal Control over Financial Reporting (ICOFR) Department.
6. Audit progress as of May 2025.
7. Audit progress as of June 2025.
8. Audit realization until quarter II of 2025.
9. Audit realization as of August 2025.
10. Progress of SKAI audit as of September 2025, follow-up on findings, and matters of concern.
11. Audit realization for quarter III of 2025, follow-up on findings, and matters of concern.
12. Kick-off meeting of KAP EY audit.
13. Audit progress as of December 2025 and the integrity of the Bank's financial reporting - ICOFR.

Brief Report on Implementation of Audit Committee's Activities in 2025

Throughout 2025, the Audit Committee consistently carried out various activities as concrete manifestation of the implementation of its functions, roles, and responsibilities, as outlined below:

1. Making Audit Committee's Annual Report.
2. Updating Audit Committee Charter.
3. Evaluating the implementation of audit services by KAP EY on the Financial Statements of Bank Victoria International Tbk for the period of 31 December 2024.
4. Reviewing the Implementation Report on the Main Results of Internal Audit for Semester I and II of 2025.
5. Making Audit Committee recommendations to the Board of Commissioners regarding the appointment of public accountant/public accounting firm to audit Bank Victoria's historical Financial Statements for the period of 31 December 2025.
6. Conducting GCG self-assessment regarding the implementation of Audit Committee's functions for Semester II of 2024 and Semester I of 2025.
7. Preparing Audit Committee's work plan.

Furthermore, Audit Committee also conducted assessment and evaluation through report analysis and meeting arrangement, with these review results were then submitted to the Board of Commissioners in form of Internal Memo, covering matters:

1. Reviewing Internal Audit Reports for 5 (five) audited areas and branches.

2. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 10 (sepuluh) objek pemeriksaan Unit Kerja Bisnis.
3. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 8 (delapan) Unit Kerja Non-Bisnis.
4. Melakukan penelaahan atas Laporan Hasil Audit Internal terhadap 6 (enam) Unit Kerja - mandatori.
5. Melakukan penelaahan Laporan Keuangan dan realisasi pencapaian RBB dan pengendalian internal - triwulanan.
6. Melakukan penelaahan terhadap hasil *review* Unit Kerja Khusus - ICOFR.

Hasil penelaahan Komite Audit telah dituangkan kedalam Memo Internal dan disampaikan kepada Dewan Komisaris.

Pelatihan dan/atau Peningkatan Komite Audit

Pada tahun 2025, anggota Komite Audit turut berpartisipasi dalam program pengembangan kompetensi, yang pelaksanaannya terintegrasi dengan kegiatan pelatihan serta peningkatan kapasitas bagi Dewan Komisaris dan Komite Pemantau Risiko.

2. Reviewing Internal Audit Reports for 10 (ten) audited Business Work Units.
3. Reviewing Internal Audit Reports for 8 (eight) Non-Business Work Units.
4. Reviewing Internal Audit Reports for 6 (six) Work Units - mandatory.
5. Reviewing Financial Statements and the realization of RBB and internal control achievements - quarterly.
6. Reviewing the results of Special Work Unit - ICOFR.

The Audit Committee's review results are outlined in the Internal Memo and submitted to the Board of Commissioners.

Audit Committee's Training and/or Development Programs

In 2025, Audit Committee members participated in competency development program, the implementation of which was integrated with training and capacity building activities for the Board of Commissioners and Risk Monitoring Committee.



Organ Pendukung Dewan Komisaris
Board of Commissioners' Supporting Organ

Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris ditunjuk oleh Bank untuk mengelola fungsi kesekretariatan dan protokoler, serta mendukung administrasi, perencanaan, dan koordinasi kegiatan Dewan Komisaris. Dengan pertanggungjawaban langsung kepada Dewan Komisaris, peran ini diarahkan untuk menciptakan tata kelola kesekretariatan yang efektif dan efisien guna memastikan kelancaran pelaksanaan tugas Dewan Komisaris.

Tugas dan Tanggung Jawab Sekretaris Dewan Komisaris

Sekretaris Dewan Komisaris menjalankan peran penting dengan lingkup tugas dan tanggung jawab yang mencakup, antara lain:

1. Membantu Dewan Komisaris dalam menjaga agar pelaksanaan BOC *Charter* secara teknis dapat dilakukan dengan tertib.
2. Mengatur terselenggaranya rapat Dewan Komisaris.
3. Menyiapkan risalah rapat untuk disahkan dalam rapat berikutnya.
4. Menyiapkan laporan tentang pelaksanaan keputusan rapat guna dikaji dalam rapat berikutnya.
5. Menjaga kerahasiaan seluruh dokumen yang menurut sifatnya harus dirahasiakan.

Secretary of the Board of Commissioners

Secretary of the Board of Commissioners is appointed by the Bank to manage secretarial and protocol functions, as well as to support the administration, planning, and coordination of the Board of Commissioners' activities. With direct accountability to the Board of Commissioners, this role is directed at creating effective and efficient secretarial governance to ensure the smooth implementation of Board of Commissioners' duties.

Duties and Responsibilities of Board of Commissioners' Secretary

Secretary of the Board of Commissioners plays a crucial role, with scope of duties and responsibilities, including:

1. To help the Board of Commissioners in maintaining the implementation of BOC Charter technically, so that it can be conducted in an orderly manner.
2. To manage the implementation of Board of Commissioners' meetings.
3. To prepare minutes of meeting to be validated in the next meeting.
4. To prepare report on the implementation of meeting decisions in order to be reviewed in the next meeting.
5. To maintain the confidentiality of all confidential documents.

Komite di Bawah Direksi
Board of Directors' Subordinate Committees

Komite Manajemen Risiko

Komite Manajemen Risiko merupakan komite eksekutif yang dibentuk oleh Direksi untuk mendukung proses pengambilan keputusan sekaligus menjamin efektivitas penerapan manajemen risiko. Komite Manajemen Risiko berperan dalam merumuskan kebijakan, strategi, dan tujuan pengelolaan risiko, sesuai dengan ketentuan yang ditetapkan melalui Surat Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib *Risk Management Committee*.

Risk Management Committee

Risk Management Committee is an executive committee established by the Board of Directors to support decision-making process and ensure the effective implementation of risk management. The Risk Management Committee plays a role in formulating risk management policies, strategies, and objectives, in accordance with the provisions stated in Board of Directors' Decision Letter No. 019A/SK-DIR/10/23 dated 19 October 2023 on Charter and Work Guidelines of the Risk Management Committee.

Pedoman Komite Manajemen Risiko

Dalam menjalankan peran dan fungsinya, Komite Manajemen Risiko berlandaskan pada ketentuan regulasi yang berlaku, antara lain Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, serta Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Manajemen Risiko

Komite Manajemen Risiko melaksanakan tugas dan tanggung jawabnya dengan menjunjung tinggi prinsip independensi. Setiap keputusan diambil secara objektif, tanpa pengaruh atau intervensi dari pihak manapun, sehingga dapat meminimalkan potensi benturan kepentingan serta melindungi kepentingan dan keberlanjutan usaha Bank.

Wewenang, Tanggung Jawab, dan Tugas serta Realisasi Pelaksanaan Tugas Komite Manajemen Risiko

Uraian mengenai kewenangan, tanggung jawab serta tugas, dan pelaksanaan tugas Komite Manajemen Risiko sepanjang tahun 2025 sebagai berikut:

1. Wewenang dan tanggung jawab:
   a. Menyusun dan menyetujui kebijakan, strategi, dan pedoman penerapan manajemen risiko Bank, termasuk strategi kerangka kerja, metodologi, sistem, dan tools pengelolaan risiko termasuk rencana-rencana kontingensi dan memastikan penerapannya yang meliputi semua jenis risiko.
   b. Melakukan penyempurnaan proses manajemen risiko secara berkala maupun bersifat insidental sebagai akibat dari suatu perubahan kondisi eksternal dan internal yang memengaruhi kecukupan permodalan, profil risiko, dan tidak efektifnya penerapan manajemen risiko berdasarkan hasil evaluasi.
   c. Menetapkan hal-hal terkait dengan keputusan bisnis yang menyimpang dari prosedur normal, seperti pelampauan ekspansi usaha yang signifikan dibandingkan dengan rencana bisnis yang telah ditetapkan sebelumnya atau pengambilan posisi/eksposur risiko yang melampaui limit yang telah ditetapkan.
   d. Menyusun dan menyetujui *recovery plan* yang merupakan pedoman bagi Bank dalam mengelola risiko dan modal dalam kondisi krisis agar dapat ditanggulangi secara cepat dan tepat.
2. Tugas dan realisasi:
   a. Melakukan pengembangan atas penerapan budaya risiko untuk setiap jenjang organisasi.

Risk Management Committee Charter

In carrying out its roles and functions, the Risk Management Committee is guided by applicable regulations, including Financial Services Authority Regulation No. 18/POJK.03/2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Circular No. 34/SEOJK.03/2016 on Risk Management Implementation for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, and Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Statement of Independence of Risk Management Committee

Risk Management Committee carries out its duties and responsibilities by upholding the principle of independence. Every decision is made objectively, without influence or intervention from any party, thereby minimizing potential conflicts of interest and protecting the interests and sustainability of the Bank's business.

Authorities, Responsibilities, Duties, and the Realization of Risk Management Committee Duties

Description of authority, responsibilities, and duty implementation of the Risk Management Committee throughout 2025 is as follows:

1. Authorities and responsibilities:
   a. Preparing and approving policies, strategies, and charter for implementing the Bank's risk management, including strategy framework, methodology, system, and risk management tools including contingency plans and ensuring their implementation covering all types of risks.
   b. Improving the risk management process, both periodically or incidental as result of changes in the external and internal conditions affecting the capital adequacy, risk profile, and ineffective implementation of risk management based on evaluation results.
   c. Determining matters related to business decisions that deviate from normal procedures, such as significant excess of business expansion compared to the established business plan or taking a position/risk exposure that exceeds the established limits.
   d. Preparing and approving recovery plan that is the charter for the Bank in managing risk and capital in crisis condition so that it can be handled quickly and appropriately.
2. Duties and realizations:
   a. Developing the implementation of risk culture for each organizational level.

b. Mengevaluasi dan menyesuaikan Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko dengan kebijakan otoritas yang disesuaikan dengan ukuran dan kompleksitas usaha Bank serta risiko yang melekat pada Bank.
c. Mengevaluasi arah, strategi, dan program manajemen risiko.
d. Memantau implementasi Kebijakan dan Pedoman Umum Penerapan Manajemen Risiko.
e. Memantau posisi risiko secara komprehensif, melakukan *stress testing* dan *back testing*.
f. Mengkaji proses manajemen risiko secara berkala.
g. Mengkaji usulan aktivitas/produk baru.
h. Melakukan pengungkapan manajemen risiko yang mencakup kinerja dan arah kebijakan manajemen risiko.
i. Mengevaluasi *recovery plan* secara berkala.
j. Menyetujui langkah-langkah perbaikan untuk mengatasi masalah risiko yang menjadi perhatian regulator.

Struktur dan Keanggotaan Komite Manajemen Risiko

Komite Manajemen Risiko dibentuk dengan komposisi yang mencakup mayoritas anggota Direksi sebagai anggota tetap serta didukung oleh anggota tidak tetap dari jajaran Pejabat Eksekutif Bank. Penetapan susunan keanggotaan dilakukan oleh Direktur Utama dengan mempertimbangkan tingkat eksposur risiko yang dihadapi Bank. Struktur keanggotaan tersebut telah disahkan melalui Keputusan Direksi No. 020/SK-DIR/01/24 tanggal 24 Januari 2024 tentang Perubahan Penunjukan Susunan Anggota Komite Manajemen Risiko PT Bank Victoria Internasional Tbk, dengan rincian sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko.
3. Sekretaris diisi oleh Kepala Divisi Manajemen Risiko.
4. Anggota diisi oleh Direksi dan *Senior Executive Vice President*.
5. Undangan Tetap Anggota diisi oleh Kepala Divisi SKAI, Kepala Divisi IT, Kepala Divisi *Treasury*, Kepala Divisi *Operation & Internal Control*, Kepala Divisi *Finance and Accounting*, Kepala Divisi CMO, dan Kepala Divisi *Compliance, System Procedure & Customer Protection*.
6. Undangan Tidak Tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Manajemen Risiko

Berdasarkan Surat Keputusan Direksi No. 019A/SK-DIR/10/23 tanggal 19 Oktober 2023 tentang Pedoman dan Tata Tertib Risk Management Committee, komite diwajibkan menyelenggarakan rapat sekurang-kurangnya sekali

b. Evaluating and adjusting the Risk Management Policy and General Guidelines with authority policies to regulatory policies, which are adjusted to the Bank's business size and complexity and the risks inherent in the Bank.
c. Evaluating risk management direction, strategy, and program.
d. Monitoring the implementation of Risk Management Policy and General Guidelines.
e. Monitoring the risk position comprehensively, conducting stress testing and back testing.
f. Reviewing the risk management process periodically.
g. Reviewing any proposed new activities/products.
h. Conducting risk management disclosure that includes performance and policy direction of risk management.
i. Evaluating recovery plans periodically.
j. Approving corrective measures to address risk issues that are of concern to regulators.

Structure and Composition of Risk Management Committee

Risk Management Committee is established with a composition that includes a majority of the Board of Directors as permanent members, supported by non-permanent members from the Bank's Executive Officers. The composition is determined by President Director, by considering the level of risk exposure faced by the Bank. This structure has been approved through Board of Directors' Decision No. 020/SK-DIR/01/24 dated 24 January 2024 on Changes in the Appointment of Members of Risk Management Committee of PT Bank Victoria Internasional Tbk, with the following details:

1. Chairman held by the President Director.
2. Vice Chairman held by the Director of Compliance and Risk Management.
3. Secretary held by the Head of Risk Management Division.
4. Members held by the Board of Directors and Senior Executive Vice President.
5. Permanent Invitation for Members filled in by Head of SKAI Division, Head of IT Division, Head of Treasury Division, Head of Operation & Internal Control Division, Head of Finance and Accounting Division, Head of CMO Division, and Head of Compliance, System Procedure & Customer Protection Division.
6. Non-Permanent Invitation filled in by invited internal and external parties.

Risk Management Committee's Meeting

Based on the Board of Directors' Decision Letter No. 019A/SK-DIR/10/23 dated 19 October 2023 on Charter and Work Guidelines of the Risk Management Committee, the committee is required to hold meetings at least once

dalam setiap 3 (tiga) bulan. Rapat dinyatakan sah apabila dihadiri oleh minimal 51% anggota tetap. Sepanjang tahun 2025, Komite Manajemen Risiko telah menyelenggarakan rapat sebanyak 11 (sebelas) kali dengan tingkat partisipasi kehadiran sebesar 75,40%.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) merupakan komite eksekutif yang dibentuk untuk membantu Direksi dalam menjaga keseimbangan antara aset dan liabilitas Bank. Melalui fungsi pengawasan dan pengambilan keputusan strategis, ALCO berperan dalam memastikan likuiditas tetap terjaga, risiko dapat dikendalikan, serta kinerja keuangan Bank dapat dioptimalkan secara berkelanjutan.

Pedoman ALCO

Pelaksanaan tugas dan tanggung jawab ALCO didasarkan pada ketentuan yang tertuang dalam Surat Keputusan Direksi No. 007/SK-DIR/02/25 tentang Pedoman dan Tata Tertib Kerja *Assets & Liabilities Committee* (ALCO), yang menjadi acuan utama dalam menjalankan fungsi dan perannya.

Pernyataan Independensi ALCO

Dalam menjalankan fungsi dan kewenangannya, seluruh anggota ALCO berkomitmen untuk menjaga independensi serta objektivitas. Setiap keputusan diambil secara profesional guna mencegah terjadinya potensi benturan kepentingan dan memastikan perlindungan terhadap kepentingan serta keberlanjutan usaha Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas ALCO

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas ALCO sepanjang tahun 2025 sebagai berikut:

1. Memantau dan memperhatikan struktur neraca dan memaksimumkan profitabilitas.
2. Merencanakan, menetapkan, dan mengendalikan sumber dan penggunaan dana Bank.
3. Menetapkan tingkat suku bunga kredit maupun pendanaan.
4. Melakukan evaluasi anggaran dan realisasi Laporan Keuangan Bank dengan memperhatikan indikator-indikator/risiko Bank.
5. Merumuskan, menetapkan, dan mengevaluasi kebijakan, strategi, dan sasaran dalam beberapa bidang, yaitu Manajemen Strategi, Manajemen Likuiditas, Manajemen *Gap*, serta Manajemen Investasi dan Pendapatan (*Pricing*) dalam lingkup ALMA.
6. Memantau dan memperhatikan perkembangan kondisi ekonomi mikro maupun makro, seperti inflasi, nilai tukar, dan perkembangan suku bunga yang dapat memengaruhi kinerja Bank.

every 3 (three) months. A meeting is deemed valid if attended by at least 51% of the permanent members. Throughout 2025, Risk Management Committee held 11 (eleven) meetings with a participation rate of 75.40%.

Assets and Liability Committee

Assets and Liabilities Committee (ALCO) is an executive committee established to assist the Board of Directors in maintaining a balance between the Bank's assets and liabilities. Through its oversight and strategic decision-making functions, ALCO plays a role in ensuring liquidity is maintained, risks are managed, and the Bank's financial performance is optimized on a sustainable basis.

ALCO Charter

The implementation of ALCO duties and responsibilities is based on the provisions stated in the Board of Directors' Decision Letter No. 007/SK-DIR/02/25 on Charter and Work Guidelines of Assets & Liabilities Committee (ALCO), which serve as the primary reference in performing its functions and roles.

Statement of Independency of ALCO

In carrying out its functions and authorities, all ALCO members are committed to maintaining independence and objectivity. Every decision is made professionally to prevent potential conflicts of interest and ensure the protection of the Bank's interests and business sustainability.

Duties, Responsibilities, and the Realization of ALCO Duties

Description of responsibilities, duties, and duty implementation of ALCO throughout 2025 is as follows:

1. Monitoring and overseeing the balance sheet structure and maximizing profitability.
2. Planning, establishing, and controlling the source and use of Bank funds.
3. Establishing interest rates on credit and funding.
4. Evaluating the budget and realization of the Bank's Financial Statements with due regard to the Bank's indicators/risks.
5. Formulating, establishing, and evaluating policies, strategies, and objectives in several areas, which are Strategic Management, Liquidity Management, Gap Management, and Investment and Pricing Management within the scope of ALMA.
6. Monitoring and observing the development of micro and macroeconomic conditions, such as inflation, exchange rates, and interest rate development that may affect the Bank's performance.

Struktur dan Keanggotaan ALCO

Struktur keanggotaan ALCO Bank Victoria ditetapkan melalui Surat Keputusan Direksi No. 008/SK-DIR/02/25 tentang tentang Perubahan Susunan Anggota Assets and Liabilities Committee (ALCO) PT Bank Victoria International Tbk, dengan rincian sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Wakil Direktur Utama.
3. Sekretaris merangkap anggota diisi oleh Kepala Divisi *Treasury*.
4. Sekretriat diisi oleh Divisi *Treasury*.
5. Anggota diisi oleh seluruh Direksi, seluruh *Senior Executive Vice President*, Kepala Divisi Direktorat Bisnis, Kepala Divisi *Branch Banking*, Kepala Divisi *Risk Management,* dan Kepala Divisi *Finance and Accounting*.
6. Selain Anggota tersebut di atas, ALCO dapat mengundang Kepala Divisi lain untuk menghadiri rapat ALCO sesuai dengan topik yang dibahas pada rapat tersebut.

Rapat ALCO

Mengacu pada Pedoman Kerja ALCO, komite ini diwajibkan menyelenggarakan rapat secara rutin paling sedikit sekali setiap bulan serta dapat mengadakan rapat insidental sesuai kebutuhan. Rapat dinyatakan sah apabila dihadiri oleh sekurang-kurangnya 50% dari jajaran Direksi, tidak termasuk Direktur Kepatuhan dan Manajemen Risiko. Sepanjang tahun 2025, ALCO telah melaksanakan rapat sebanyak 19 (sembilan belas) kali dengan tingkat kehadiran sebesar 90,83%.

Structure and Composition of ALCO

The structure of ALCO of Bank Victoria is established through the Board of Directors' Decision Letter No. 008/SK-DIR/02/25 on Changes to the Composition of Assets and Liabilities Committee (ALCO) of PT Bank Victoria International Tbk, with the following details:

1. Chairman held by President Director.
2. Vice Chairman held by the Deputy President Director.
3. Secretary concurrently as member held by the Head of Treasury Division.
4. Secretariat held by the Treasury Division.
5. Members held by all Board of Directors, all Senior Executive Vice Presidents, Head of Business Directorate Division, Head of Branch Banking Division, Head of Risk Management Division, and Head of Finance and Accounting Division.
6. In addition to the aforementioned members, ALCO may invite other Division Heads to attend ALCO meetings based on the topics discussed at the meeting.

ALCO's Meeting

Referring to ALCO Charter, this committee is required to hold regular meetings at least once a month and can hold incidental meetings as necessary. A meeting is deemed valid if attended by at least 50% of the Board of Directors, excluding Director of Compliance and Risk Management. Throughout 2025, ALCO held 19 (nineteen) meetings with an attendance rate of 90.83%.

Komite Kredit

Komite Kredit merupakan komite yang berperan mendukung pengelolaan aktivitas perkreditan Bank, khususnya dalam memastikan pemberian kredit sesuai dengan limit dan ketentuan yang berlaku. Komite ini bertanggung jawab untuk menelaah, mengevaluasi, serta memberikan persetujuan atas keputusan kredit, sehingga kualitas portofolio kredit Bank tetap terjaga secara sehat dan berkesinambungan.

Pedoman Komite Kredit

Pelaksanaan tugas dan tanggung jawab Komite Kredit berlandaskan pada ketentuan yang ditetapkan dalam Surat Keputusan Direksi No. 014/SK-DIR/01/24 tanggal 18 Januari 2024 tentang Pedoman dan Tata Tertib Kerja Komite Kredit, yang menjadi acuan utama dalam menjalankan fungsi serta wewenangnya.

Credit Committee

Credit Committee is a committee that supports the management of the Bank's credit activities, specifically ensuring that lending complies with applicable limits and regulations. This committee is responsible for reviewing, evaluating, and approving credit decisions, ensuring the quality of the Bank's credit portfolio remains healthy and sustainable.

Credit Committee Charter

Duties and responsibilities of Credit Committee are carried out based on the provisions stipulated in the Board of Directors' Decision Letter No. 014/SK-DIR/01/24 dated 18 January 2024 on Charter and Work Guidelines of Credit Committee, which serve as the primary reference in performing its functions and authorities.

Pernyataan Independensi Komite Kredit

Dalam menjalankan perannya, setiap anggota Komite Kredit berkomitmen untuk menjunjung tinggi prinsip independensi dan profesionalisme. Sikap tersebut diterapkan guna memastikan seluruh keputusan kredit diambil secara objektif, terhindar dari potensi benturan kepentingan, serta mampu melindungi kepentingan dan keberlangsungan usaha Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Kredit

Tugas dan tanggung jawab serta realisasi pelaksanaan tugas dari Komite Kredit di tahun 2025 adalah memberikan persetujuan/penolakan terhadap usulan fasilitas penyediaan dana dari masing-masing divisi/unit pengusul.

Struktur dan Keanggotaan Komite Kredit

Struktur keanggotaan Komite Kredit ditetapkan melalui Surat Keputusan Direksi No. 014/SK-DIR/01/24 tanggal 18 Januari 2024, dengan rincian susunan anggota sebagai berikut:

1. Ketua diisi oleh Wakil Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Bisnis.
3. Sekretaris merangkap Anggota diisi oleh Kepala Divisi *Credit Risk Review*.
4. Anggota diisi oleh Direktur Utama, Direktur Keuangan, *SEVP of Operation & International Banking*, Kepala Divisi *SME & Consumer Banking*, Kepala Divisi *Commercial Banking*, Kepala Divisi *Special Asset Management*, Kepala Divisi *Credit Legal*, Kepala Divisi *Loan & Trade Operation, Credit Monitoring & Collection Vice Division Head, Business Linkage Department Head,* dan *Consumer Department Head*.
5. Undangan Tetap diisi oleh Direktur Kepatuhan dan Manajemen Risiko, Kepala Divisi *International Banking*, Kepala Divisi *Treasury*, dan Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection*.

Rapat Komite Kredit

Berdasarkan Pedoman Kerja Komite Kredit, rapat Komite Kredit wajib diselenggarakan paling sedikit sekali setiap minggu dan dapat dilakukan secara insidental sesuai kebutuhan. Setiap keputusan rapat hanya dapat diambil apabila memenuhi syarat kuorum serta disepakati secara bulat oleh seluruh anggota pemutus. Apabila terjadi perbedaan pendapat, maka pengajuan kredit dinyatakan tidak disetujui. Sepanjang tahun 2025, Komite Kredit telah melaksanakan rapat sebanyak 90 (sembilan puluh) kali dengan tingkat kehadiran sebesar 100,00%.

Statement of Independence of Credit Committee

In carrying out their roles, every member of Credit Committee is committed to upholding the principles of independence and professionalism. Such stance is implemented to ensure that all credit decisions are made objectively, free from potential conflicts of interest, and capable to protect the interests and business continuity of the Bank.

Duties, Responsibilities, and the Realization of Credit Committee Duties

Duties and responsibilities as well as realization of Credit Committee's duties in 2025 were to approve/reject proposed funding facilities from each proposing division/unit.

Structure and Composition of Credit Committee

The structure of Credit Committee is established through the Board of Directors' Decision Letter No. 014/SK-DIR/01/24 dated 18 January 2024 with the following composition details:

1. Chairman held by Deputy President Director.
2. Vice Chairman held by Director of Business.
3. Secretary concurrently as Member held by the Head of Credit Risk Review Division.
4. Members held by President Director, Director of Finance, SEVP of Operation & International Banking, Head of SME & Consumer Banking Division, Head of Commercial Banking Division, Head of Special Asset Management Division, Head of Credit Legal Division, Head of Loan & Trade Operation Division, Credit Monitoring & Collection Vice Division Head, Business Linkage Department Head, and Consumer Department Head.
5. Permanent Invitation filled in by Director of Compliance and Risk Management, Head of International Banking Division, Treasury Division Head, and Head of Compliance, System Procedure & Coordinator Customer Protection Division.

Credit Committee Meeting

Based on Credit Committee Charter, meetings of Credit Committee shall be held at least once a week and can be held incidentally as necessary. Each meeting decision can only be made if the quorum requirement is met and unanimously agreed upon by all members. In the event of dissenting opinion, the credit application will be deemed unapproved. Throughout 2025, Credit Committee held 90 (ninety) times meetings with an attendance rate of 100.00%.

Komite Kebijakan Perkreditan

Komite Kebijakan Perkreditan dibentuk oleh Direksi sebagai wadah strategis dalam merumuskan kebijakan kredit yang *prudent*. Komite ini berperan dalam mengawasi implementasi kebijakan, menilai konsistensi penerapannya, serta memastikan prinsip kehati-hatian dijalankan secara menyeluruh. Selain itu, Komite Kebijakan Perkreditan turut melakukan pemantauan atas kondisi portofolio kredit dan memberikan rekomendasi perbaikan guna mendukung kualitas serta keberlanjutan usaha Bank.

Pedoman Komite Kebijakan Perkreditan

Dalam melaksanakan tugas dan tanggung jawabnya, Komite Kebijakan Perkreditan mengacu pada Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2017 tentang Kewajiban Penyusunan dan Pelaksanaan Kebijakan Perkreditan atau Pembiayaan bagi Bank Umum, Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Tata Kelola bagi Bank Umum, dan Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.

Pernyataan Independensi Komite Kebijakan Perkreditan

Dalam melaksanakan fungsi dan tanggung jawabnya, anggota Komite Kebijakan Perkreditan berpegang pada prinsip independensi dan profesionalisme. Setiap keputusan diambil secara objektif untuk memastikan pengelolaan kebijakan kredit terbebas dari potensi benturan kepentingan serta tetap berorientasi pada perlindungan kepentingan dan keberlanjutan usaha Bank.

Wewenang, Tanggung Jawab, dan Tugas serta Realisasi Pelaksanaan Tugas Komite Kebijakan Perkreditan

Uraian mengenai kewenangan, tanggung jawab serta tugas, dan pelaksanaan tugas Komite Kebijakan Perkreditan sepanjang tahun 2025 sebagai berikut:

1. Wewenang dan tanggung jawab:
    a. Memastikan kebijakan perkreditan Bank dan seluruh peraturan pelaksanaannya sesuai dengan peraturan perundang-undangan dan regulasi yang berlaku.
    b. Memberikan usulan dan rekomendasi terkait aspek perkreditan, termasuk target *market, negative list*, sektor usaha yang harus dihindari, serta maksimum portofolio kredit per sektor usaha.
    c. Memberikan masukan kepada Direksi dalam penyusunan kebijakan perkreditan Bank.
    d. Melakukan evaluasi berkala terhadap kualitas kredit Bank serta memberikan saran perbaikan dan penyempurnaan proses kredit, baik secara rutin maupun insidental akibat perubahan kondisi eksternal dan internal.

Credit Policy Committee

Credit Policy Committee is established by the Board of Directors as a strategic forum for formulating prudent credit policies. This committee plays a role in overseeing policy implementation, assessing the consistency of its application, and ensuring that prudent principles are comprehensively implemented. Furthermore, Credit Policy Committee also monitors the condition of credit portfolio and provides recommendations for improvements to support the quality and sustainability of the Bank's business.

Credit Policy Committee Charter

In performing its duties and responsibilities, the Credit Policy Committee refers to Financial Services Authority Regulation No. 42/POJK.03/2017 on Obligation for Compilation and Implementation of Bank Credit or Financing Policies for Commercial Banks, Financial Services Authority Regulation No. 17 of 2023 on Governance for Commercial Banks, and Financial Services Authority Circular No. 14/SEOJK.03/2025 on Governance Implementation for Commercial Banks.

Statement of Independence of Credit Policy Committee

In carrying out their functions and responsibilities, members of Credit Policy Committee adhere to the principles of independence and professionalism. Every decision is made objectively to ensure that credit policy management is free from any potential conflicts of interest and remains oriented towards protecting the interests and sustainability of the Bank's business.

Authorities, Responsibilities, Duties, and the Realization of Credit Policy Committee Duties

Description of authority, responsibilities, and duty implementation of the Credit Policy Committee throughout 2025 is as follows:

1. Authorities and responsibilities:
    a. Ensuring that the Bank's credit policy and all implementing regulations are in accordance with applicable laws and regulations.
    b. Providing proposals and recommendations related to credit aspects, including target market, negative list, business sector to avoid, and maximum credit portfolio per business sector.
    c. Providing input to the Board of Directors in preparing the Bank's credit policy.
    d. Periodically evaluating the Bank's credit quality and providing suggestions for improvements and refinements to the credit process, both routinely and incidentally due to changes in external and internal conditions.

2. Tugas dan realisasi:
   a. Mengawasi penerapan memastikan kebijakan perkreditan Bank dan standar operasional prosedur perkreditan agar dijalankan secara konsisten oleh organisasi perkreditan Bank.
   b. Melakukan kajian terhadap kebijakan perkreditan Bank dan standar operasional prosedur perkreditan jika ditemukan hambatan dalam implementasi berdasarkan hasil pemantauan dan pengawasan Komite Kebijakan Perkreditan.
   c. Memberikan usulan dan/atau saran perbaikan terhadap kebijakan perkreditan Bank dan standar operasional prosedur perkreditan jika diperlukan perubahan atau penyempurnaan.
   d. Memantau dan mengevaluasi berbagai aspek perkreditan, termasuk perkembangan dan kualitas portofolio kredit Bank, kebenaran kewenangan dalam memutus kredit bank, strategi pengelolaan kredit, kepatuhan terhadap ketentuan BMPK dan regulasi lainnya, pencapaian target *market* kredit serta pembiayaan sektor industri dengan mempertimbangkan tren pasar dan ekonomi, penyelesaian kredit bermasalah dan pembentukan CKPN.
   e. Menyampaikan laporan tertulis kepada Direksi terkait perkembangan dan perbaikan kebijakan perkreditan Bank dan standar operasional prosedur perkreditan yang diusulkan oleh Komite Kebijakan Perkreditan.

Struktur dan Keanggotaan Komite Kebijakan Perkreditan

Struktur keanggotaan Komite Kebijakan Perkreditan telah ditetapkan berdasarkan Surat Keputusan Direksi No. 021/SK-DIR/01/24 tanggal 24 Januari 2024, dengan rincian susunan anggota sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua I merangkap Anggota diisi oleh Wakil Direktur Utama.
3. Wakil Ketua II merangkap Anggota diisi oleh Direktur Bisnis.
4. Sekretaris merangkap Anggota diisi oleh Kepala Divisi *Risk Management*.
5. Anggota diisi oleh Direktur Keuangan; Direktur Kepatuhan dan Manajemen Risiko; *Senior EVP* Bisnis; Senior EVP Operasional & *International Banking*, Kepala Divisi SME & *Consumer Banking*; Kepala Divisi *Commercial Banking*; Kepala Divisi *Credit Risk Review*; Kepala Divisi *Loan & Trade Operations*; Kepala Divisi *Special Asset Management*; Kepala Divisi *Credit Legal;* Kepala Divisi *International Banking*; Kepala Divisi *International Banking*; Wakil Kepala Divisi *Credit Monitoring & Collection*; dan Kepala Divisi *Compliance, System Procedure & Customer Protection.*

2. Duties and realizations:
   a. Overseeing the implementation by ensuring that the Bank's credit policies and credit standard operating procedures are carried out consistently by the Bank's credit organization.
   b. Reviewing the Bank's credit policies and credit standard operating procedures if obstacles are found in implementation based on the monitoring and supervision results by the Credit Policy Committee.
   c. Providing proposals and/or suggestions for improvements to the Bank's credit policies and credit standard operating procedures if changes or refinements are needed.
   d. Monitoring and evaluating various aspects of credit, including the development and quality of the Bank's credit portfolio, the correctness of authority in deciding on bank credit, credit management strategies, compliance with LLL provisions and other regulations, achievement of credit market targets and financing of industrial sector by considering market and economic trends, settlement of problematic credit and the formation of CKPN.
   e. Submitting written report to the Board of Directors regarding the development and improvement of the Bank's credit policy and credit standard operating procedures proposed by Credit Policy Committee.

Structure and Composition of Credit Policy Committee

The structure of Credit Policy Committee is determined based on the Board of Directors' Decision Letter No. 021/SK-DIR/01/24 dated 24 January 2024, with the following composition details:

1. Chairman held by President Director.
2. Vice Chairman I concurrently as Member held by Deputy President Director.
3. Vice Chairman II concurrently as Member held by Business Director.
4. Secretary concurrently as Member held by Head of Risk Management Division.
5. Members held by the Director of Finance; Director of Compliance and Risk Management; Senior EVP Business; Senior EVP Operations & International Banking; Head of SME & Consumer Banking Division; Head of Commercial Banking Division; Head of Credit Risk Review Division; Head of Loan & Trade Operations Division; Head of Special Asset Management Division; Head of Credit Legal Division; Head of International Banking Division; Credit Monitoring & Collection Vice Division Head; and Head of Compliance, System Procedure & Customer Protection Division.

6. Undangan Tetap diisi oleh Kepala Divisi SKAI, Kepala Divisi *Corporate Legal*, Kepala Divisi *Treasury*, dan Kepala Divisi *Accounting*.
7. Undangan Tidak Tetap diisi oleh pihak internal dan eksternal yang diundang.

Rapat Komite Kebijakan Perkreditan

Berdasarkan Surat Keputusan Direksi No. 006/SK-DIR/01/24 tanggal 9 Januari 2026, Komite Kebijakan Perkreditan diwajibkan menyelenggarakan rapat baik secara berkala maupun insidental sesuai kebutuhan. Rapat dinyatakan sah apabila dihadiri sedikitnya 50% dari jajaran Direksi serta 50% dari anggota non-Direksi. Sepanjang tahun 2025, Komite Kebijakan Perkreditan telah mengadakan rapat sebanyak 7 (tujuh) kali dengan tingkat kehadiran mencapai 80,88%.

Komite Pengarah Teknologi Informasi

Komite Pengarah Teknologi Informasi dibentuk sebagai komite yang bertugas memastikan pengelolaan teknologi informasi berjalan sejalan dengan arah bisnis dan strategi Bank. Komite ini berperan dalam memberikan masukan dan rekomendasi terkait pengembangan serta pengelolaan sistem informasi, sekaligus mengawasi kesiapan infrastruktur teknologi agar dapat mendukung efektivitas operasional dan pencapaian kinerja Bank secara optimal.

Pedoman Komite Pengarah Teknologi Informasi

Dalam menjalankan peran dan tanggung jawabnya, Komite Pengarah Teknologi Informasi berpedoman pada ketentuan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum, yang menjadi acuan utama dalam penerapan tata kelola serta pengelolaan teknologi informasi di Bank.

Pernyataan Independensi Komite Pengarah Teknologi Informasi

Setiap anggota Komite Pengarah Teknologi Informasi melaksanakan tugas dan tanggung jawabnya dengan menjunjung tinggi prinsip independensi dan objektivitas. Sikap tersebut diterapkan untuk memastikan seluruh keputusan yang diambil bebas dari potensi benturan kepentingan serta tetap berorientasi pada perlindungan kepentingan Bank dan keberlanjutan operasionalnya.

6. Permanent Invitation filled in by Head of SKAI Division, Head of Corporate Legal Division, Head of Treasury Division, and Head of Accounting Division.
7. Non-Permanent Invitation filled in by invited internal and external parties.

Credit Policy Committee's Meeting

Based on the Board of Directors' Decision Letter No. 006/SK-DIR/01/24 dated 9 January 2026, Credit Policy Committee is required to hold meetings, both periodically and incidentally as necessary. A meeting is deemed valid if attended by at least 50% of the Board of Directors and 50% of non-Board of Directors members. Throughout 2025, Credit Policy Committee held 7 (seven) meetings with an attendance rate of 80.88%.

Information Technology Steering Committee

The Information Technology Steering Committee is established to ensure that the management of information technology is in line with the Bank's business direction and strategy. This committee plays a role in providing input and recommendations on the development and management of information systems, while also overseeing the readiness of technology infrastructure to support operational effectiveness and optimal achievement of the Bank's performance.

Information Technology Steering Committee Charter

In performing its roles and responsibilities, the Information Technology Steering Committee is guided by the provision of Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks, that serves as the primary reference for implementing information technology governance and management at the Bank.

Statement of Independence of Information Technology Steering Committee

Every member of the Information Technology Steering Committee carries out duties and responsibilities by upholding the principles of independence and objectivity. Such stance is implemented to ensure that all decisions are free from potential conflicts of interest and remain oriented toward protecting the Bank's interests and sustainability of its operations.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Pengarah Teknologi Informasi

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Pengarah Teknologi Informasi sepanjang tahun 2025 sebagai berikut:

1. Memastikan rencana strategis teknologi informasi selaras dengan rencana korporasi Bank.
2. Memastikan kebijakan, standar, dan prosedur teknologi informasi sesuai dengan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tanggal 6 Juli 2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum.
3. Memantau kesesuaian antara rencana pengembangan teknologi informasi dengan rencana strategis teknologi informasi.
4. Memastikan kesesuaian antara pelaksanaan pengembangan teknologi informasi dengan rencana yang telah ditetapkan.
5. Mengevaluasi efektivitas biaya teknologi informasi dalam kaitannya dengan pencapaian manfaat yang telah direncanakan.
6. Memantau kinerja teknologi informasi serta upaya peningkatan performanya.
7. Menyelesaikan permasalahan teknologi informasi yang tidak dapat diselesaikan oleh satuan kerja pengguna dan penyelenggara, dengan cara yang efektif, efisien, dan tepat waktu.
8. Menilai kecukupan dan alokasi sumber daya teknologi informasi yang dimiliki Bank.
9. Memastikan langkah-langkah mitigasi risiko atas investasi teknologi informasi, agar investasi tersebut memberikan kontribusi terhadap pencapaian tujuan bisnis Bank.
10. Memastikan kesesuaian pelaksanaan proyek teknologi informasi dengan rencana proyek yang disepakati (*project charter*) dalam *Service Level Agreement* (SLA).
11. Memastikan kesesuaian pelaksanaan proyek teknologi informasi sesuai dengan kebutuhan sistem informasi manajemen serta kebutuhan kegiatan usaha Bank.
12. Memastikan strategi dan rencana teknologi informasi telah memiliki serta didukung standar operasional prosedur yang memadai.
13. Memastikan penerapan standar operasional prosedur teknologi informasi secara konsisten dan benar.

Struktur dan Keanggotaan Komite Pengarah Teknologi Informasi

Struktur keanggotaan Komite Pengarah Teknologi Informasi telah ditetapkan melalui Surat Keputusan Direksi No. 022/SK-DIR/01/24 tanggal 24 Januari 2024, dengan susunan anggota sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Wakil Direktur Utama.

Duties, Responsibilities, and the Realization of Information Technology Steering Committee Duties

Description of responsibilities, duties, and duty implementation of Information Technology Steering Committee throughout 2025 is as follows:

1. Ensuring that the information technology strategic plan is in line with the Bank's corporate plan.
2. Ensuring that information technology policies, standards, and procedures comply with Financial Services Authority Regulation No. 11/POJK.03/2022 dated 6 July 2022 on Information Technology Operations by Commercial Banks.
3. Monitoring the conformity between information technology development plan and information technology strategic plan.
4. Ensuring conformity between the implementation of information technology development and the established plan.
5. Evaluating the effectiveness of information technology costs in relation to achieving planned benefits.
6. Monitoring the performance of information technology and its efforts to improve the performance.
7. Resolving information technology problems unable to be resolved by user and organizing work units, in an effective, efficient, and timely manner.
8. Assessing the adequacy and allocation of information technology resources owned by the Bank.
9. Ensuring risk mitigation measures for information technology investments, so that these investments contribute to achieving the Bank's business objectives.
10. Ensuring the conformity of information technology project implementation with the project charter agreed in the Service Level Agreement (SLA).
11. Ensuring the conformity of information technology project implementation in line with the needs of management information system and the needs of the Bank's business activities.
12. Ensuring that information technology strategies and plans have and are supported by adequate standard operating procedures.
13. Ensuring the implementation of standard operating procedures for information technology in a consistent and correct manner.

Structure and Composition of Information Technology Steering Committee

The structure of Information Technology Steering Committee has been established through the Board of Directors' Decision Letter No. 022/SK-DIR/01/24 dated 24 January 2024 with the composition as follows:

1. Chairman held by President Director.
2. Vice Chairman held by Deputy President Director.

3. Sekretaris diisi oleh Kepala Divisi *Information Technology*.
4. Anggota Tetap diisi oleh Direktur Keuangan; Direktur Bisnis; Direktur Kepatuhan dan Manajemen Risiko; *Senior Executive Vice President of Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Finance, Accounting & MIS; Senior Executive Vice President of Operations & International Banking;* Kepala Divisi *Risk Management;* Kepala Divisi *Change Management Office*; dan Kepala Divisi *HCM & General Affairs*.
5. Undangan Tetap diisi oleh Kepala Divisi SKAI, Wakil Kepala Divisi General Affair, Kepala Divisi Accounting, dan Kepala Divisi *Branch Banking Network & Digital Sales.*

Rapat Komite Pengarah Teknologi Informasi

Berdasarkan Surat Keputusan Direksi No. 022A/SK-DIR/01/24 tanggal 24 Januari 2024 tentang Pedoman dan Tata Tertib Kerja Komite Pengarah Teknologi Informasi, komite diwajibkan menyelenggarakan rapat secara berkala sedikitnya sekali setiap 3 (tiga) bulan atau sewaktu-waktu sesuai kebutuhan Bank. Rapat dinyatakan sah apabila dihadiri oleh minimal 2 (dua) anggota Direksi serta 50% + 1 (satu) dari anggota. Sepanjang tahun 2025, Komite Pengarah Teknologi Informasi telah melaksanakan 4 (empat) kali rapat dengan tingkat kehadiran mencapai 90,00%.

Komite Pemantau dan Pelaksanaan GCG

Komite Pemantau dan Pelaksanaan GCG berperan dalam mendukung Direksi untuk merumuskan, menyosialisasikan, dan mengawasi penerapan GCG, kode etik, sistem pengendalian internal, serta strategi pencegahan *fraud*. Selain itu, komite ini juga bertanggung jawab memastikan kepatuhan terhadap prinsip-prinsip tersebut dengan mengambil langkah perbaikan yang diperlukan guna memperkuat integritas dan efektivitas tata kelola Bank.

Pedoman Komite Pemantau dan Pelaksanaan GCG

Pelaksanaan tugas dan tanggung jawab Komite Pemantau dan Pelaksanaan GCG berlandaskan pada ketentuan yang diatur dalam Surat Keputusan Direksi No. 022/SK-DIR/07/24 tanggal 31 Juli 2024 tentang Pedoman dan Tata Tertib Kerja Komite Pemantau dan Pelaksanaan Good Corporate Governance (GCG), yang menjadi acuan dalam menjalankan peran serta fungsinya.

3. Secretary held by Head of Information Technology Division;
4. Permanent Members held by Director of Finance; Director of Business; Director of Compliance and Risk Management; Senior Executive Vice President of Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Finance, Accounting & MIS; Senior Executive Vice President of Operations & International Banking; Head of Risk Management Division; Head of Change Management Office Division; and Head of HCM & General Affairs Division.
5. Permanent Invitation filled in by Head of SKAI Division, General Affairs Vice Division Head, Head of Accounting Division, and Head of Branch Banking Network.

Information Technology Steering Committee's Meeting

Based on the Board of Directors' Decision Letter No. 022A/SK-DIR/01/24 dated 24 January 2024 on the Charter and Work Guidelines of Information Technology Steering Committee, the committee is required to hold regular meetings at least once every 3 (three) months or as necessary according to the Bank's needs. A meeting is deemed valid if attended by at least 2 (two) members of the Board of Directors and 50% + 1 (one) of the members. Throughout 2025, the Information Technology Steering Committee held 4 (four) meetings with an attendance rate of 90.00%.

GCG Implementation and Monitoring Committee

GCG Implementation and Monitoring Committee plays a role in supporting the Board of Directors in formulating, disseminating information, and overseeing GCG implementation, code of conduct, internal control system, and fraud prevention strategies. Furthermore, this committee is also responsible for ensuring compliance with these principles by taking necessary corrective measures to strengthen the integrity and effectiveness of the Bank's governance.

GCG Implementation and Monitoring Committee Charter

The implementation of duties and responsibilities of GCG Implementation and Monitoring Committee is based on the provisions stipulated in Board of Directors' Decision Letter No. 022/SK-DIR/07/24 dated 31 July 2024 on Charter of the Good Corporate Governance (GCG) Implementation and Monitoring Committee, which serve as a reference in performing its roles and functions.

Pernyataan Independensi Komite Pemantau dan Pelaksanaan GCG

Setiap anggota Komite Pemantau dan Pelaksanaan GCG melaksanakan tugas dan tanggung jawabnya dengan menjunjung tinggi prinsip independensi dan integritas. Hal ini dilakukan untuk memastikan seluruh keputusan diambil secara objektif, bebas dari potensi benturan kepentingan, serta tetap berfokus pada perlindungan kepentingan dan keberlanjutan usaha Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Pemantau dan Pelaksanaan GCG

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Pemantau dan Pelaksanaan GCG sepanjang tahun 2025 sebagai berikut:

1. Memantau dan menganalisis setiap kebijakan terbaru maupunpraktik terbaik terkait penerapan GCG.
2. Melakukan pemutakhiran kebijakan internal (*existing*) terhadap setiap perubahan kebijakan GCG.
3. Memantau secara berkala terhadap rencana dan realisasi/pencapaian bisnis Bank melalui rapat-rapat komite.
4. Memantau rencana kerja Bank dan pelaksanaannya melalui rapat-rapat komite.
5. Menentukan aspek dan PIC/petugas dalam penyusunan GCG sesuai dengan bidang yang tercermin dari aspek-aspek GCG.
6. Mengoordinasikan pembuatan laporan pelaksanaan GCG yang dilengkapi dan didukung dengan pendukung.
7. Menyusun pelaporan pelaksanaan GCG Bank dan melakukan penilaian sendiri sesuai ketentuan berlaku, serta melaporkannya kepada Direktur Utama dan Otoritas Jasa Keuangan.

Struktur dan Keanggotaan Komite Pemantau dan Pelaksanaan GCG

Komposisi anggota Komite Pemantau dan Pelaksanaan GCG telah ditetapkan melalui Surat Keputusan Direksi No. 017/SK-DIR/07/24 tanggal 31 Juli 2024 tentang Susunan Anggota Komite Pemantau Pelaksanaan GCG. Rincian susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Direktur Kepatuhan dan Manajemen Risiko.
2. Sekretaris diisi oleh Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection*.
3. Sekretariat diisi oleh Divisi Compliance, System Procedure & Coordinator Customer Protection.

Statement of Independence of GCG Implementation and Monitoring Committee

Every member of GCG Implementation and Monitoring Committee carries out duties and responsibilities by upholding the principles of independence and integrity. This is carried out to ensure that all decisions are made objectively, free from potential conflicts of interest, and remain focused on protecting the interests and sustainability of the Bank's business.

Duties, Responsibilities, and the Realization of GCG Implementation and Monitoring Committee Duties

Description of responsibilities, duties, and duty implementation of GCG Implementation and Monitoring Committee throughout 2025 is as follows:

1. Monitoring and analyzing any current policy and best practices related to GCG implementation.
2. Updating the existing internal policies against any GCG policy changes.
3. Monitoring periodically on the Bank's plans and business realizations/achievements through committee meetings.
4. Monitoring the Bank's work plan and its implementation through committee meetings.
5. Determining aspects and person in charge/PIC in drafting GCG in accordance with the areas reflected in GCG aspects.
6. Coordinating the preparation of GCG implementation reports, supplemented and supported by its supporting documents.
7. Preparing the reporting of the Bank's GCG implementation and conducting self-assessment in accordance with the prevailing provisions, and report it to the President Director and Financial Services Authority.

Structure and Composition of GCG Implementation and Monitoring Committee

The composition of GCG Implementation and Monitoring Committee has been determined through the Board of Directors' Decision Letter No. 017/SK-DIR/07/24 dated 31 July 2024 on the Composition of GCG Implementation and Monitoring Committee. Details of the composition are as follows:

1. Chairman held by Director of Compliance and Risk Management.
2. Secretary held by Head of Compliance, System Procedure & Coordinator Customer Protection Division.
3. Secretariat held by Compliance, System Procedure & Coordinator Customer Protection Division

4. Anggota diisi oleh Direksi, Senior *Executive Vice President*, Kepala Divisi SKAI, Kepala Divisi Risk Management, Kepala Divisi SKAI & Anti Fraud, dan Kepala Divisi Corporate Secretary.

5. Undangan Tetap seluruh Kepala Divisi dan/atau Departemen.

Rapat Komite Pemantau dan Pelaksanaan GCG

Merujuk pada Surat Keputusan Direksi No. 022/SK-DIR/07/24 tanggal 31 Juli 2024, Komite Pemantau dan Pelaksanaan GCG memiliki kewajiban untuk menyelenggarakan rapat sekurang-kurangnya 3 (tiga) kali dalam setahun. Sepanjang tahun 2025, Komite Pemantau dan Pelaksanaan GCG telah melaksanakan rapat sebanyak 3 (tiga) kali dengan tingkat kehadiran mencapai 100,00%.

Komite Personalia

Komite Personalia dibentuk sebagai bagian dari mekanisme tata kelola untuk membantu Direksi dalam pengelolaan aspek ketenagakerjaan. Komite ini berperan dalam meninjau kebijakan HC, mengawasi implementasi regulasi ketenagakerjaan di sektor perbankan, serta menyampaikan rekomendasi strategis guna mendukung terciptanya praktik ketenagakerjaan yang sesuai dengan ketentuan perundang-undangan di Indonesia.

Pedoman Komite Personalia

Pelaksanaan tugas dan fungsi Komite Personalia senantiasa berlandaskan pada ketentuan perundang-undangan, khususnya Peraturan Pemerintah Pengganti Undang-Undang No. 2 Tahun 2022 tentang Cipta Kerja.

Pernyataan Independensi Komite Personalia

Anggota Komite Personalia menjalankan tugas dan tanggung jawab dengan menjunjung tinggi prinsip independensi, guna memastikan setiap keputusan yang diambil terbebas dari potensi benturan kepentingan serta tetap mengutamakan kepentingan terbaik bagi Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Personalia

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Personalia sepanjang tahun 2025 sebagai berikut:

1. Memberikan masukkan kepada Direksi dalam merumuskan kebijakan ketenagakerjaan.
2. Mengawasi kebijakan yang berhubungan dengan karyawan agar dilaksanakan secara konsekuen dan konsisten.

4. Members held by the Board of Directors, Senior Executive Vice President, Head of SKAI & Anti-Fraud Division, Head of Risk Management Division, Head of SKAI & Anti-Fraud Division, and Head of Corporate Secretary Division.
5. Permanent Invitation for all Division and/or Department Heads.

GCG Implementation and Monitoring Committee's Meeting

Referring to the Board of Directors' Decision Letter No. 022/SK-DIR/07/24 dated 31 July 2024, GCG Implementation and Monitoring Committee shall hold meetings at least 3 (three) times a year. Throughout 2025, GCG Implementation and Monitoring Committee held 3 (three) meetings with an attendance rate of 100.00%.

Personnel Committee

Personnel Committee is established as part of governance mechanism to assist the Board of Directors in managing employment aspects. This committee plays a role in reviewing HC policies, overseeing the implementation of employment regulations in banking sector, and providing strategic recommendations to support the creation of employment practices that comply with Indonesian laws and regulations.

Personnel Committee Charter

The implementation of Personnel Committee's duties and functions is always based on laws and regulations, specifically Government Regulations in Lieu of Law No. 2 of 2022 on Job Creation.

Statement of Independence of Personnel Committee

Members of the Personnel Committee carry out their duties and responsibilities by upholding the principle of independence, to ensure that every decision taken is free from potential conflict of interest and prioritizes the best interests of the Bank.

Duties, Responsibilities, and the Realization of Personnel Committee Duties

Description of responsibilities, duties, and duty implementation of Personnel Committee throughout 2025 is as follows:

1. Providing inputs to Board of Directors in formulating employment policies.
2. Overseeing employee-related policies to be consistently and consequently implemented.

3. Melakukan kajian terhadap kebijakan ketenagakerjaan Bank dan memberikan saran kepada Direksi apabila diperlukan perubahan kebijakan ketenagakerjaan Bank.
4. Memantau dan mengevaluasi efektivitas setiap karyawan.
5. Memberikan masukan dan solusi untuk hambatan dan masalah yang terjadi terkait dengan ketenagakerjaan Bank.

Struktur dan Keanggotaan Komite Personalia

Komposisi anggota Komite Personalia telah ditetapkan melalui Surat Keputusan Direktur No. 014/SK-DIR/12/24 tanggal 23 Desember 2024, dengan susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Wakil Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Utama.
3. Sekretaris diisi oleh Kepala Divisi *Human Capital Management*.
4. Sekretariat diisi oleh Divisi *Human Capital Management*.
5. Anggota diisi oleh Direksi (sesuai undangan).

Rapat Komite Personalia

Merujuk pada Surat Keputusan Direktur No. 014/SK-DIR/12/24 tanggal 23 Desember 2024, Komite Personalia memiliki kewajiban untuk menyelenggarakan rapat sekurang-kurangnya 3 (tiga) kali dalam setahun, dengan ketentuan rapat dinyatakan sah apabila dihadiri oleh minimal 51% anggota tetap. Sepanjang tahun 2025, Komite Personalia telah mengadakan rapat sebanyak 8 (delapan) kali dengan tingkat kehadiran mencapai 100,00%.

Komite Pengadaan

Komite Pengadaan dibentuk untuk membantu Direksi dalam mengawasi seluruh aktivitas pengadaan barang dan jasa agar berjalan secara transparan, efektif, serta sejalan dengan ketentuan yang berlaku. Komite ini memiliki peran dalam mengevaluasi kebijakan pengadaan, memonitor implementasinya, dan memastikan setiap keputusan yang diambil memberikan nilai tambah bagi kepentingan strategis maupun operasional Bank.

Pedoman Komite Pengadaan

Pelaksanaan tugas dan tanggung jawab Komite Pengadaan berpedoman pada Surat Keputusan Direksi No. 011/SK-DIR/07/24 tanggal 29 Juli 2024 tentang Komite Pengadaan PT Bank Victoria International Tbk.

3. Reviewing Bank's manpower policies and advising the Board of Directors if changes to the Bank's manpower policy are necessary.
4. Monitoring and evaluating the effectiveness of each employee.
5. Providing inputs and solutions for the obstacles and problems that occur related to the Bank's employment.

Structure and Composition of Personnel Committee

The composition of Personnel Committee has been determined through the Board of Directors' Decision Letter No. 014/SK-DIR/12/24 dated 23 December 2024 with the composition as follows:

1. Chairman held by Deputy President Director.
2. Vice Chairman held by President Director.
3. Secretary held by Head of Human Capital Management Division.
4. Secretariat held by Human Capital Management Division.
5. Members held by Board of Directors (according to invitation).

Personnel Committee's Meeting

Referring to Directors' Decision Letter No. 014/SK-DIR/12/24 dated 23 December 2024, Personnel Committee shall hold at least 3 (three) meetings per year, with the requirement that a meeting is deemed valid if attended by at least 51% of the permanent members. Throughout 2025, the Personnel Committee held 8 (eight) meetings with an attendance rate of 100.00%.

Procurement Committee

The Procurement Committee is established to assist the Board of Directors in overseeing all procurement activities for goods and services, ensuring they are carried out transparently, effectively, and in accordance with applicable regulations. This committee's role is to evaluate procurement policies, monitor their implementation, and ensure that every decision made adds value to the Bank's strategic and operational interests.

Procurement Committee Charter

The Procurement Committee's duties and responsibilities are guided by the Board of Directors' Decision Letter No. 011/SK-DIR/07/24 dated 29 July 2024 on Procurement Committee of PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Pengadaan

Anggota Komite Pengadaan melaksanakan tugas dan tanggung jawab dengan menjunjung tinggi prinsip independensi, sehingga setiap proses pengambilan keputusan dapat terhindar dari potensi benturan kepentingan serta tetap mengutamakan perlindungan terhadap kepentingan Bank.

Tugas dan Tanggung Jawab Komite Pengadaan

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Pengadaan sepanjang tahun 2025 sebagai berikut:

1. Meminta informasi untuk hal-hal yang diperlukan terkait pengadaan barang dan jasa dari berbagai pihak, baik internal maupun eksternal.
2. Memberikan persetujuan terhadap pengajuan pengadaan barang dan jasa.
3. Mengajukan persetujuan kepada Dewan Komisaris terhadap pengadaan barang dan jasa dengan nilai/harga minimum sesuai yang diatur pada Anggaran Dasar Bank.
4. Memberikan masukan kepada Direksi terkait hal-hal penting dan relevan dalam perumusan kebijakan pengadaan barang dan jasa.

Struktur dan Keanggotaan Komite Pengadaan

Komposisi anggota Komite Pengadaan ditetapkan berdasarkan Surat Keputusan Direksi No. 011/SK-DIR/07/24 tanggal 29 Juli 2024, dengan susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Wakil Direktur Utama.
2. Wakil Ketua diisi oleh Direktur Utama.
3. Sekretaris diisi oleh *General Affairs Vice Division Head*.
4. Anggota Tetap diisi oleh Direktur Keuangan, Direktur Bisnis, *SEVP of Business, SEVP of Operation & International Banking, SEVP of Finance, Accounting & MIS, SEVP of Change Management Office, HCM & General Affairs Division*.

Rapat Komite Pengadaan

Merujuk pada Surat Keputusan Direksi No. 011/SK-DIR/07/24 tanggal 29 Juli 2024, Komite Pengadaan memiliki kewajiban untuk menyelenggarakan rapat sedikitnya 3 (tiga) kali dalam setahun, dengan ketentuan rapat dinyatakan sah apabila dihadiri oleh minimal 51% anggota tetap. Sepanjang tahun 2025, Komite Pengadaan telah mengadakan rapat sebanyak 13 (tiga belas) kali dengan tingkat kehadiran sebesar 100,00%.

Statement of Independence of Procurement Committee

Members of the Procurement Committee carry out their duties and responsibilities by upholding the principle of independence, ensuring that every decision-making process avoids potential conflict of interest and prioritizes protecting the Bank's interests.

Duties and Responsibilities of Procurement Committee

Description of responsibilities, duties, and duty implementation of Procurement Committee throughout 2025 is as follows:

1. Asking for information on necessary matters related to the procurement of goods and services from various parties, both internal and external.
2. Providing approval on the procurement of goods and services.
3. Applying for approval to the Board of Commissioners on procurement of goods and services with minimum value/price as regulated in the Company's Articles of Association.
4. Providing inputs to the Board of Directors regarding important and relevant matters in the formulation of procurement policies of goods and services.

Structure and Composition of Procurement Committee

The composition of Procurement Committee is determined based on the Board of Directors' Decision Letter No. 011/SK-DIR/07/24 dated 29 July 2024, with the composition as follows:

1. Chairman held by Deputy President Director.
2. Vice Chairman held by President Director.
3. Secretary held by General Affairs Vice Division Head.
4. Permanent Members held by Director of Finance, Director of Business, SEVP of Business, SEVP of Operation & International Banking, SEVP of Finance, Accounting & MIS, SEVP of Change Management Office, HCM & General Affairs Division.

Procurement Committee's Meeting

Referring to the Board of Directors' Decision Letter No. 011/SK-DIR/07/24 dated 29 July 2024, Procurement Committee shall hold at least 3 (three) meetings per year, with the requirement that a meeting is deemed valid if attended by at least 51% of the permanent members. Throughout 2025, Procurement Committee held 13 (thirteen) meetings with an attendance rate of 100.00%.

Komite Produk

Komite Produk berperan membantu Direksi dalam merumuskan kebijakan terkait pengelolaan produk *liabilities* dan *wealth management* agar memiliki daya saing serta memberikan nilai tambah bagi Bank. Dalam menjalankan fungsinya, Komite senantiasa mengutamakan kepentingan nasabah maupun Bank, dengan tetap berlandaskan pada prinsip kehati-hatian serta penerapan manajemen risiko yang efektif.

Pedoman Komite Produk

Pelaksanaan tugas dan wewenang Komite Produk berlandaskan pada Surat Keputusan Direksi No. 008/SK-DIR/08/24 tanggal 15 Agustus 2024 tentang Komite Produk PT Bank Victoria International Tbk.

Pernyataan Independensi Komite Produk

Anggota Komite Produk menjalankan peran dan tanggung jawab dengan menjunjung tinggi prinsip independensi, sehingga setiap keputusan yang diambil terbebas dari potensi benturan kepentingan dan tetap berorientasi pada perlindungan serta keberlanjutan kepentingan Bank.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas Komite Produk

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas Komite Produk sepanjang tahun 2025 sebagai berikut:

1. Memberikan masukan, pertimbangan, dan rekomendasi kepada Direksi terkait pengelolaan produk *asset and liabilities*, termasuk rencana penerbitan, pengembangan, modifikasi, dan analisis produk yang sudah ada.

2. Mengawasi penerapan kebijakan produk secara konsisten dan bertanggung jawab serta menemukan solusi untuk mengatasi hambatan atau kendala yang muncul.
3. Memantau dan mengevaluasi risiko potensial terhadap perkembangan penjualan produk, poin-poin pengawasan kebijakan produk, strategi kebijakan produk, dan portofolio produk. Selain itu, memberikan masukan dan saran kepada Direksi untuk menentukan langkah-langkah perbaikan yang diperlukan.

Product Committee

Product Committee plays a role in assisting the Board of Directors in formulating policies related to the management of liabilities and wealth management products to ensure competitiveness and added value to the Bank. In carrying out its functions, the Committee consistently prioritizes the interests of both customers and the Bank, while adhering to the principle of prudent and the implementation of effective risk management.

Product Committee Charter

Duties and authorities of Product Committee are based on Board of Directors' Decision Letter No. 008/SK-DIR/08/24 dated 15 August 2024 on Product Committee of PT Bank Victoria International Tbk.

Statement of Independence of Product Committee

Members of the Product Committee carry out their roles and responsibilities by upholding the principle of independence, ensuring that every decision taken is free from potential conflict of interest and remains oriented toward the protection and sustainability of the Bank's interests.

Duties, Responsibilities, and the Realization of Product Committee Duties

Description of responsibilities, duties, and duty implementation of Product Committee throughout 2025 is as follows:

1. Providing input, considerations, and recommendations to the Board of Directors regarding management of asset and liabilities products, including the plan of launching, developing, modifying, and analyzing the existing products.
2. Monitoring the implementation of product policy consistently and responsibly and seeking solutions to overcome obstacles or constraints that arise.

3. Monitoring and evaluating potential risks to product sales developments, product policy monitoring points, product policy strategies, and product portfolio. In addition, providing input and advice to the Board of Directors to determine the necessary improvements.

Struktur dan Keanggotaan Komite Produk

Komposisi anggota Komite Produk ditetapkan melalui Surat Keputusan Direksi No. 009/SK-DIR/08/24 tanggal 15 Agustus 2024 tentang Komite Produk PT Bank Victoria International Tbk, dengan susunan keanggotaan sebagai berikut:

1. Ketua diisi oleh Direktur Utama.
2. Wakil Ketua diisi oleh Wakil Direktur Utama.
3. Sekretaris diisi oleh *Marketing Communication* dan *Brand and Product Division Head*.
4. Anggota diisi oleh Direktur Bisnis; Direktur Keuangan; *Senior Executive Vice President Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Operations & International Banking; Senior Executive Vice President of Finance, Accounting & Strategic Performance Management*; Kepala Divisi *Information Technology*; Kepala Divisi *Operations & Internal Control*; Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection;* Kepala Divisi *Accounting*; Kepala Divisi *Treasury*; Kepala Divisi *Risk Management*; Kepala Divisi *Branch Banking Network;* Kepala Divisi *Change Management Office; E-Channel and Digital Transformation Department Head;* dan Kepala Divisi *Commercial Banking*.

Rapat Komite Produk

Merujuk pada Surat Keputusan Direksi No. 008/SK-DIR/08/24, Komite Produk berkewajiban menyelenggarakan rapat sedikitnya 3 (tiga) kali dalam setahun atau sewaktu-waktu apabila diperlukan. Suatu rapat dinyatakan sah apabila dihadiri oleh sekurang-kurangnya 50% + 1 (satu) dari jumlah anggota tetap. Sepanjang tahun 2025, Komite Produk telah mengadakan rapat sebanyak 4 (empat) kali dengan tingkat kehadiran sebesar 100,00%.

Structure and Composition of Product Committee

The composition of Product Committee is determined based on the Board of Directors' Decision Letter No. 009/SK-DIR/08/24 dated 15 August 2024 on Product Committee of PT Bank Victoria International Tbk, with composition as follows:

1. Chairman held by President Director.
2. Vice Chairman held by Deputy President Director.
3. Secretary held by Marketing Communication and Brand and Product Division Head.
4. Members held by Director of Business; Director of Finance; Senior Executive Vice President Change Management Office; Senior Executive Vice President of Business; Senior Executive Vice President of Operations & International Banking; Senior Executive Vice President of Finance, Accounting & Strategic Performance Management; Head of Information Technology Division; Head of Operations & Internal Control Division; Head of Compliance, System Procedure & Coordinator Customer Protection Division; Head of Accounting Division; Head of Treasury Division; Head of Risk Management Division; Head of Branch Banking Network; Head of Change Management Office Division; E-Channel and Digital Transformation Department Head; and Head of Commercial Banking Division.

Product Committee's Meeting

Referring to the Board of Directors' Decision Letter No. 008/SK-DIR/08/24, the Product Committee shall hold at least 3 (three) meetings in a year or at any time as necessary. A meeting is deemed valid if attended by at least 50% + 1 (one) of the permanent members. Throughout 2025, Product Committee held 4 (four) meetings with an attendance rate of 100.00%.

Organ Pendukung Direksi
Board of Directors Supporting Organ

Corporate Secretary

Corporate Secretary berperan strategis dalam memastikan kepatuhan Bank terhadap hukum dan peraturan, menyampaikan informasi penting kepada pemangku kepentingan secara tepat waktu, akurat, dan transparan, serta mengelola komunikasi internal-eksternal untuk menjaga dan meningkatkan reputasi Bank.

Pedoman *Corporate Secretary*

Pelaksanaan tugas *Corporate Secretary* mengacu pada pedoman kerja yang telah disesuaikan dengan:

1. Peraturan Otoritas Jasa Keuangan No. 35/POJK.04/2014 tanggal 8 Desember 2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik.
2. Standar Operasional Prosedur *Corporate Secretary* Surat Keputusan Direksi No. 005/SK-DIR/09/24 tanggal 17 September 2024.
3. Standar Operasional Prosedur Rapat Umum Pemegang Saham berdasarkan Keputusan Direksi No. 004/SK-DIR/08/24 tanggal 13 Agustus 2024.

Tugas dan Tanggung Jawab serta Realisasi Pelaksanaan Tugas *Corporate Secretary*

Uraian mengenai tanggung jawab serta tugas dan pelaksanaan tugas *Corporate Secretary* sepanjang tahun 2025 sebagai berikut:

1. Mengikuti perkembangan pasar modal, khususnya peraturan-peraturan yang berlaku di bidang pasar modal.
2. Memberikan pelayanan kepada masyarakat atas setiap informasi yang dibutuhkan pemodal berkaitan dengan kondisi Bank.
3. Memberikan masukan kepada Direksi Bank untuk mematuhi ketentuan Undang-Undang No. 8 Tahun 1995 tentang Pasar Modal dan peraturan pelaksanaannya.
4. Sebagai penghubung atau *contact person* antara Bank dengan Otoritas Jasa Keuangan serta masyarakat.

Corporate Secretary

Corporate Secretary plays a strategic role in ensuring the Bank's compliance with laws and regulations, conveying important information to stakeholders in a timely, accurate, and transparent manner, and managing internal and external communications to maintain and enhance the Bank's reputation.

Corporate Secretary Charter

The Corporate Secretary's duty implementation is carried out in accordance with the charter adjusted to:

1. Financial Services Authority Regulation No. 35/POJK.04/2014 dated 8 December 2014 on Corporate Secretary of Issuers or Public Companies.
2. Standard Operating Procedures of Corporate Secretary based on the Board of Directors' Decision Letter No. 005/SK-DIR/09/24 dated 17 September 2024.
3. Standard Operating Procedures of General Meeting of Shareholders based on the Board of Directors' Decision Letter No. 004/SK-DIR/08/24 dated 13 August 2024.

Duties, Responsibilities, and the Realization of Corporate Secretary Duties

Description of responsibilities, duties, and duty implementation of Corporate Secretary throughout 2025 is as follows:

1. To follow the capital market development, especially regulations applicable in capital market sector.
2. To provide services to the public for any information required by the investors in relation to the Bank's condition.
3. To provide input to the Bank's Board of Directors to comply with the provisions of Law No. 8 of 1995 on Capital Market and its implementing regulations.
4. To be the liaison or contact person between the Bank and Financial Services Authority and public.

Profil Kepala Divisi Corporate Secretary
Profile of Head of Corporate Secretary Division

CAPRIE ARDIRA AZHAR

Kepala Divisi *Corporate Secretary*
Head of Corporate Secretary Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
38 tahun / 38 years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 012/SK-DIR/HCM/01/21 tanggal 11 Januari 2021 (2021-sekarang).

Riwayat Pendidikan
Sarjana Hukum dari Universitas Padjadjaran (2012).

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

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan
- *Associate Lawyer Makes & Partners Lawfirm* (2012-2014).
- *Legal & Corporate Secretary* PT Victoria Investama Tbk (2014-2018)
.
- *Head Legal and Compliance* PT Sucor Sekuritas (2018-2019).
- *Unit Head Corporate Secretary Bank* Victoria (2019-2021).

Sertifikasi
Sertifikasi Manajemen Risiko Jenjang 5 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 012/SK-DIR/HCM/01/21 dated 11 January 2021 (2021-present).

Education
Bachelor of Law from Padjadjaran University (2012).

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Previous
- Associate Lawyer of Makes & Partners Lawfirm (2012-2014).
- Legal & Corporate Secretary of PT Victoria Investama Tbk (2014-2018).
- Head of Legal and Compliance of PT Sucor Sekuritas (2018-2019).
- Corporate Secretary Unit Head of Bank Victoria (2019-2021).

Certification
Certification of Risk Management Level 5 from Banking Profession Certification Institute (2024-2027).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Pelatihan dan/atau Peningkatan *Corporate Secretary*

Selama tahun 2025, *Corporate Secretary* aktif berpartisipasi dalam berbagai program pengembangan kompetensi, baik melalui pelatihan internal maupun eksternal, guna mendukung peningkatan profesionalisme dan efektivitas pelaksanaan tugas dengan materi, antara lain:

1. *Sharing Session "Suistainable Growth Through Digitalization and Strong Governance"* - Diselenggarakan oleh Internal Bank Victoria.
2. *Training Refreshment* Manajemen Risiko Jenjang 5 – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
3. *Training Refreshment Financial Integrity Rating* (FIR) 2025 dan Tindak Pidana Pencucian Uang - Diselenggarakan oleh Andara Sarana.
4. *Team Building: "One Team, Endless Possibilities"* - Diselenggarakan oleh Internal Bank Victoria.
5. *Training Building a Fraud-Resilent Bank: From Detection to Response* – Diselenggarakan oleh Victoria Institute.

Corporate Secretary's Training and/or Development Programs

Throughout 2025, Corporate Secretary actively participated in various competency development programs, both through internal and external training, to support the improvement of professionalism and effectiveness of duties with topics, including:

1. Sharing Session "Sustainable Growth Through Digitalization and Strong Governance" - Organized by Bank Victoria Internally.
2. Training Refreshment of Risk Management Level 5 - Organized by Indonesian Banking Development Institute.
3. Training Refreshment Financial Integrity Rating (FIR) 2025 and Money Laundering Crimes - Organized by Andara Sarana.
4. Team Building: "One Team, Endless Possibilities" - Organized by Bank Victoria Internally.
5. Training Building a Fraud-Resilient Bank: From Detection to Response – Organized by Victoria Institute.

6. *Training* Bahaya Pinjaman *Online* – Diselenggarakan oleh Internal Bank Victoria.
7. *Training: Expert Sharing Session* "Transformasi Digital IT Perbankan – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
8. *Training* Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi – Diselenggarakan oleh Victoria Institute.
9. *Training Driving Branch Productivity Through Effective Leadership* – Diselenggarakan oleh Edcore Indonesia.
10. Pendalaman Peraturan Otoritas Jasa Keuangan No. 14/POJK.04/2022 tentang Penyampaian Laporan Keuangan Berkala Emiten Atau Perusahaan Publik – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
11. Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 dan Surat Edaran Otoritas Jasa Keuangan No. 18/SEOJK.03/2023 – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
12. Konfirmasi dalam Rangka Pengajuan Persetujuan Prinsip Derivatif Keuangan dengan Aset yang Mendasari Berupa Efek – Diselenggarakan oleh Otoritas Jasa Keuangan.
13. Pendalaman Peraturan No. I-E tentang Kewajiban Penyampaian Informasi – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
14. Pendalaman Peraturan Otoritas Jasa Keuangan No. 29 Tahun 2023 tentang Pembelian Kembali Saham yang Dikeluarkan oleh Perusahaan Terbuka – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.
15. Sosialisasi Peraturan Otoritas Jasa Keuangan Transaparansi dan Publikasi Laporan dan Rancangan Peraturan Otoritas Jasa Keuangan APOLO – Diselenggarakan oleh Otoritas Jasa Keuangan.
16. Sosialisasi Surat Edaran Otoritas Jasa Keuangan No. 10/SEOJK.04/2025 – Diselenggarakan oleh Otoritas Jasa Keuangan.
17. *Refreshment* Anti-*Fraud* – Diselenggarakan oleh Internal Bank Victoria.
18. Training *Awareness* Peraturan Otoritas Jasa Keuangan Pelindungan Konsumen dan Undang-Undang Perlindungan Data Pribadi – Diselenggarakan oleh Internal Bank Victoria.
19. Webinar "Peraturan Bursa I-A Pencatatan Saham dan Efek Bersifat Ekuitas Selain Saham yang Diterbitkan oleh Perusahaan Tercatat" – Diselenggarakan oleh Institute of Chartered Secretaries and Administrators.

6. Training of Online Loan Dangers – Organized by Bank Victoria Internally.
7. Training: Expert Sharing Session "Digital Transformation of Banking IT" – Organized by Indonesian Banking Development Institute.
8. Training on Strategy and Implementation of Consumer and Personal Data Protection – Organized by Victoria Institute.
9. Training Driving Branch Productivity Through Effective Leadership - Organized by Edcore Indonesia.
10. Intensification of Financial Services Regulation No. 14/POJK.04/2022 on Submission of Periodic Financial Statements of Issuers or Public Companies – Organized by Institute of Chartered Secretaries and Administrators.
11. Financial Services Authority Regulation No. 9 of 2023 and Financial Services Authority Circular No. 18/SEOJK.03/2023 – Organized by Institute of Chartered Secretaries and Administrators.
12. Confirmation for Submission of Approval in Principle of Financial Derivatives with Underlying Assets in the Form of Securities - Organized by Financial Services Authority.
13. Intensification of Regulation No. I-E on Obligations to Submit Information - Organized by Institute of Chartered Secretaries and Administrators.
14. Intensification of Financial Services Regulation No. 29 of 2023 on Buyback of Shares Issued by Public Companies – Organized by Institute of Chartered Secretaries and Administrators.
15. Dissemination of Financial Services Authority Regulations, Transparency and Publication of Reports and Draft Financial Services Authority Regulations APOLO – Organized by Financial Services Authority.
16. Dissemination of Financial Services Authority Circular No. 10/SEOJK.04/2025 – Organized by Financial Services Authority.
17. Anti-Fraud Refreshment – Organized by Bank Victoria Internally.
18. Training Awareness on Financial Services Authority Regulations, Consumer Protection and Personal Data Protection Law – Organized by Bank Victoria Internally.
19. Webinar "Exchange Regulation I-A, Listing of Shares and Equity-Type Securities Other Than Shares Issued by Listed Companies" – Organized by Institute of Chartered Secretaries and Administrators.

Satuan Kerja Audit Internal

Satuan Kerja Audit Internal (SKAI) berperan sebagai unit independen yang berada di bawah Direktur Utama, dengan tugas utama memberikan *assurance* dan konsultasi guna memperkuat efektivitas manajemen risiko, pengendalian internal, serta penerapan tata kelola yang baik di Bank.

Pedoman SKAI

Dalam melaksanakan tugas dan tanggung jawabnya, SKAI mengacu pada Piagam Audit Internal, Sistem, Prosedur, dan Teknik Pemeriksaan Internal.

Tugas dan Tanggung Jawab SKAI

Uraian mengenai tugas dan tanggung jawab SKAI sebagai berikut:

1. Membantu tugas Direktur Utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan, maupun pemantauan hasil audit.
2. Menyusun dan melaksanakan perencanaan audit tahunan, antara lain analisis dan penilaian di bidang keuangan, akuntansi, operasional, perkreditan, dan kegiatan lain.
3. Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana.
4. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen.
5. Memantau, menganalisis, dan melaporkan pelaksanaan tindak lanjut perbaikan yang telah disarankan.
6. Memberikan penilaian tingkat keyakinan kualitas pelaksanaan tugas atas proses manajemen risiko, sistem pengendalian internal dan tata kelola usaha telah dilaksanakan secara cukup dan efektif di seluruh Unit Kerja Bank Victoria.
7. Membuat laporan hasil audit dan menyampaikan laporan tersebut kepada Direktur Utama dan Dewan Komisaris.
8. Bekerja sama dengan Komite Audit dalam melakukan pengawasan dan memonitor pelaksanaan tindak lanjut perbaikan atas temuan SKAI.
9. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen.

Fungsi Audit Internal

Bank menerapkan fungsi audit internal sebagai bagian dari sistem pengendalian internal yang bertujuan untuk memberikan penilaian independen dan objektif atas kecukupan dan efektivitas pengendalian internal, manajemen risiko, dan tata kelola Bank. Fungsi audit internal dilaksanakan oleh SKAI yang independen dari kegiatan operasional serta memiliki wewenang dan akses yang memadai dalam menjalankan tugasnya.

Internal Audit Work Unit

Internal Audit Work Unit (SKAI) acts as an independent unit under the President Director, with the primary task of providing assurance and consultation to strengthen the effectiveness of risk management, internal control, and good governance implementation at the Bank.

SKAI Charter

In performing its duties and responsibilities, SKAI refers to the Internal Audit Charter, Internal Audit System, Procedure, and Technique.

Duties and Responsibilities of the SKAI

Description of SKAI duties and responsibilities is as follows:

1. Assisting the President Director and Board of Commissioners in monitoring by detailing the operations of planning, implementation, or monitoring of the audit result.
2. Preparing and conducting the annual audit planning, among others, the analysis and assessment in the fields of finance, accounting, operations, credit, and other activities.
3. Identifying all possibilities to improve and enhance the efficient use of resources and funds.
4. Providing advice for improvement and objective information on activities audited at all management levels.
5. Monitoring, analyzing, and reporting the follow-up actions of the suggested corrective actions.
6. Assessing the confidence level of quality of duty implementation of the risk management process, internal control system, and business governance that has been implemented sufficiently and effectively in all Work Units of Bank Victoria.
7. Preparing the audit result report and submitting the report to the President Director and the Board of Commissioners.
8. Cooperating with the Audit Committee in supervising and monitoring the implementation of follow-up for improvements to SKAI findings.
9. Providing recommendations for improvement and objective information on activities audited at all management levels.

Internal Audit Function

The Bank implements internal audit function as part of internal control system aiming at providing an independent and objective assessment of the adequacy and effectiveness of internal control, risk management, and governance of the Bank. Internal audit function is carried out by SKAI, which is independent from operational activities and has adequate authority and access to carry out its duties.

Pelaksanaan fungsi audit internal dilakukan sesuai dengan rencana audit tahunan yang berbasis risiko dan mengacu pada ketentuan Otoritas Jasa Keuangan mengenai penerapan fungsi audit internal pada bank umum. Bank juga menjalin komunikasi secara berkala dengan Otoritas Jasa Keuangan guna meningkatkan efektivitas pelaksanaan fungsi audit internal serta memastikan tindak lanjut yang memadai atas temuan dan rekomendasi yang disampaikan.

Selain itu, dalam menerapkan fungsi audit internal Dewan Komisaris bertanggung jawab untuk:
1. Memastikan Direksi menyusun dan memelihara sistem pengendalian internal yang memadai, efektif, dan efisien.
2. Mengkaji efektivitas dan efisiensi sistem pengendalian internal berdasarkan laporan dan informasi dari SKAI paling sedikit 1 (satu) kali dalam 1 (satu) tahun.
3. Menunjuk pengendali mutu independen dari pihak eksternal untuk melakukan kaji ulang atas kinerja SKAI dengan mempertimbangkan rekomendasi Komite Audit.

Adapun tanggung jawab Direksi dalam penerapan fungsi audit internal sebagai berikut:
1. Mengembangkan dan memelihara kerangka pengendalian internal yang memadai guna mengidentifikasi, mengukur, memantau, dan mengendalikan seluruh risiko Bank.
2. Memastikan SKAI memperoleh informasi yang relevan terkait perkembangan kegiatan usaha, inisiatif strategis, proyek, produk, perubahan operasional, serta risiko yang diidentifikasi.
3. Memastikan tindak lanjut yang optimal atas seluruh temuan dan rekomendasi SKAI.
4. Menyediakan sumber daya dan anggaran yang memadai bagi Kepala SKAI untuk mendukung pelaksanaan rencana audit tahunan.

Kedudukan dan Struktur SKAI

SKAI beroperasi secara independen di bawah koordinasi Direktur Utama dengan akses penuh terhadap seluruh aktivitas Bank. SKAI juga memiliki jalur komunikasi langsung dengan Komite Audit dan Dewan Komisaris untuk memastikan penerapan GCG berjalan efektif. Kepala SKAI diangkat maupun diberhentikan oleh Direktur Utama dengan persetujuan Dewan Komisaris, dan setiap keputusan terkait dilaporkan kepada regulator.

The internal audit function is implemented in accordance with risk-based annual audit plan by referring to the Financial Services Authority regulations on internal audit function implementation in commercial banks. The Bank also maintains regular communication with Financial Services Authority to improve the effectiveness of internal audit function and ensure adequate follow-up on submitted findings and recommendations.

Furthermore, in implementing internal audit function, the Board of Commissioners is responsible for:
1. Ensuring that the Board of Directors prepares and maintains an adequate, effective, and efficient internal control system.
2. Reviewing the effectiveness and efficiency of internal control system based on reports and information from SKAI at least once a year.
3. Appointing an independent external quality control officer to review SKAI performance, by considering the recommendations of Audit Committee.

The Board of Directors' responsibilities in implementing internal audit function are as follows:
1. Developing and maintaining an adequate internal control framework to identify, measure, monitor, and control all Bank risks.
2. Ensuring SKAI obtains relevant information on developments in business activities, strategic initiatives, projects, products, operational changes, and risks identified.
3. Ensuring optimal follow-up on all SKAI findings and recommendations.
4. Providing adequate resources and budget for the Head of SKAI to support the implementation of annual audit plan.

Position and Structure of SKAI

SKAI operates independently under the coordination of the President Director, with full access to all activities of the Bank. SKAI also has a direct line of communication with Audit Committee and Board of Commissioners to ensure an effective GCG implementation. The Head of SKAI is appointed and dismissed by the President Director with approval of the Board of Commissioners, and all related decisions are reported to the regulator.

Profil Kepala Divisi SKAI
Profile of Head of SKAI Division

DJOKO SOENDJOJO

Kepala Divisi SKAI
Head of SKAI

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Surabaya

Usia / Age
57 tahun / 57 years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 003/SK-DIR/HCM/01/19 tanggal 2 Januari 2019 *juncto* Keputusan Direksi No. 017/SK-DIR/HCM/11/21 tanggal 22 November 2021 *juncto* Keputusan Direksi No. 001/SK-DIR/HCM/10/24 tanggal 1 Oktober 2024.

Riwayat Pendidikan
Sarjana Ekonomi dari STIE Malangkucecwara Malang (1993).

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

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan
- *Staff* Senior Akuntansi dan Keuangan PT Bank Andromeda Kantor Pusat Jakarta (1995-1997).
- *Staff* Senior Akuntansi dan Keuangan PT Bank Alfa BBKU Kantor Pusat Jakarta (1997-1999).
- *Staff* Administrasi BBO-BBKU BBPN/IBRA Kantor Pusat Jakarta (2000-2004).
- *Staff* Senior Keuangan & *Custody* Tim Likuidasi PT Bank Prasidha Utama Kantor Pusat Jakarta (2004).
- Kepala Seksi Manajemen Risiko Bank Victoria (2005).
- Kepala Seksi *Financial Control* Bank Victoria (2005-2006).
- Kepala Satuan Kerja Audit Interen (SKAI) Bank Victoria (2006-2015).
- Kepala Divisi Administrasi Pengkreditan Bank Victoria (2015-2018).

Sertifikasi
- Sertifikasi Audit Intern Level Supervisor dari Lembaga Sertifikasi Profesi Perbankan (2022-2026).
- Sertifikasi Manajemen Risiko Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan (2024-2027).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision Letter No. 003/SK-DIR/HCM/01/19 dated 2 January 2019 juncto Board of Directors' Decision Letter No. 017/SK-DIR/HCM/11/21 dated 22 November 2021 juncto Board of Directors' Decision Letter No. 001/SK-DIR/HCM/10/24 dated 1 October 2024.

Education
Bachelor of Economics from STIE Malangkucecwara, Malang (1993).

Current Concurrent Positions
In Bank Victoria:
None

Outside of Bank Victoria:
None

History of Previous
- Senior Accounting and Finance Staff of PT Bank Andromeda, Jakarta Head Office (1995-1997).
- Senior Accounting and Finance Staff of PT Bank Alfa BBKU, Jakarta Head Office (1997-1999).
- Administration Staff of BBO-BBKU BBPN/IBRA, Jakarta Head Office (2000-2004).
- Senior Staff of Finance & Custody of Liquidation Team of PT Bank Prasidha Utama, Jakarta Head Office (2004).
- Head of Risk Management Section of Bank Victoria (2005).
- Head of Financial Control Section of Bank Victoria (2005-2006).
- Head of Internal Audit Unit (SKAI) of Bank Victoria (2006-2015).
- Head of Credit Administration Division of Bank Victoria (2015-2018).

Certification
- Supervisor Level of Internal Audit Certification from the Banking Profession Certification Institute (2022-2026).
- Certification of Risk Management Level 6 from Banking Profession Certification Institute (2024-2027).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Komposisi dan Sertifikasi Profesi SKAI

Di tahun 2025, jumlah personel SKAI terdiri dari 8 (delapan) orang yang telah dibekali dengan sertifikasi manajemen risiko perbankan serta sertifikasi profesi audit internal, dengan rincian sebagai berikut:

Composition and Professional Certification of SKAI

In 2025, SKAI consisted of 8 (eight) personnel equipped with certification in banking risk management and certification in internal audit profession, with the following details:

Nama Name	Jabatan Position	Sertifikasi Certifications	Masa Berlaku Validity Period	Penyelenggara Organizer
Sertifikasi Audit Internal Internal Audit Certification				
Djoko Soendjojo	Kepala Divisi Head of Division	Level Supervisor Supervisor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Level Supervisor Supervisor Level	25 November 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	*Senior Officer*	Level Supervisor Supervisor Level	5 Desember 2026 5 December 2026	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	*Senior Officer*	Level Auditor Auditor Level	25 November 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Wilma Pramana	*Officer*	Level Auditor Auditor Level	8 September 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Theresia Alexandra Wijaya	*Officer*	Level Auditor Auditor Level	8 September 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jefferson Lianto Mualim	*Officer*	-	-	-
Fathan Qoriba	*Officer*	-	-	-
Sertifikasi Manajemen Risiko Risk Management Certification				
Djoko Soendjojo	Kepala Divisi Head of Division	Manajemen Risiko Jenjang 6 Risk Management Level 6	19 Maret 2027 19 March 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Ferry A Deuning	Kepala Unit Head of Unit	Manajemen Risiko Jenjang 5 Risk Management Level 5	4 April 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fadillah Syarif	*Senior Officer*	Manajemen Risiko Jenjang 5 Risk Management Level 5	4 April 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Diah Rucihto Januar	*Senior Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	9 September 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Wilma Pramana	*Officer*	Manajemen Risiko Jenjang 5 Risk Management Level 5	23 April 2027	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Theresia Alexandra Wijaya	*Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	6 Oktober 2028 6 October 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Jefferson Lianto Mualim	*Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	6 Oktober 2028 6 October 2028	Lembaga Sertifikasi Profesi Perbankan Banking Profession Certification Institution
Fathan Qoriba	*Officer*	Manajemen Risiko Jenjang 4 Risk Management Level 4	20 Desember 2027 20 December 2027	Badan Sertifikasi Manajemen Risiko Risk Management Certification Institution
Certificate Anti-Fraud Manager				
Ferry A Deuning	Kepala Unit Head of Unit	*Certificate Anti-Fraud Manager*	8 November 2026	Asia Anti Fraud

Rapat SKAI

SKAI menyelenggarakan rapat koordinasi dengan Komite Audit, Direksi, dan Dewan Komisaris secara berkala, sekurang-kurangnya 4 (empat) kali dalam setahun. Rapat tersebut bertujuan untuk membahas laporan hasil audit triwulanan serta isu-isu penting terkait pengendalian internal dan tata kelola. Pada tahun 2025, SKAI telah mengadakan rapat sebanyak 64 (enam puluh empat) kali dengan agenda pembahasan antara lain:

1. Pembahasan *macro risk assessment* dengan Direktur Utama sebanyak 2 (dua) kali).
2. Rencana kerja audit tahunan dengan Komite Audit sebanyak 1 (satu) kali.

SKAI Meeting

SKAI holds regular coordination meetings with Audit Committee, Board of Directors, and Board of Commissioners, at least 4 (four) times a year. These meetings aim to discuss quarterly audit reports and important issues related to internal control and governance. In 2025, SKAI held 64 (sixty-four) meetings with discussion agenda including:

1. Two (2) meetings with the President Director to discuss the macro risk assessment.
2. One (1) meeting with the Audit Committee to discuss the annual audit work plan.

3. Rencana kerja audit tahunan dengan Direktur Utama sebanyak 1 (satu) kali.
4. Pembahasan materi komunikasi SKAI dengan Otoritas Jasa Keuangan sebanyak 1 (satu) kali.
5. Pembahasan Laporan Pokok-Pokok Hasil Audit per Semester dengan Direktur Utama dan Komite Audit sebanyak 2 (dua) kali.
6. Progres audit bulanan dengan Komite Audit sebanyak 12 (dua belas) kali.
7. Progres audit mingguan dalam rapat Direktorat dengan Direktur Utama sebanyak 45 (empat puluh lima) kali.

Rencana dan Realisasi Pelaksanaan Kerja SKAI

Pada tahun 2025, seluruh kegiatan pemeriksaan dilaksanakan sesuai rencana kerja yang telah ditetapkan. Setiap tahapan audit terselesaikan tepat waktu sehingga proses pengawasan dan evaluasi terhadap unit-unit kerja berjalan efektif serta mendukung pencapaian tujuan Bank. Adapun objek audit di tahun 2025 ditunjukkan sebagai berikut:

3. One (1) meeting with the President Director to discuss the annual audit work plan.
4. One (1) meeting with the Financial Services Authority to discuss the SKAI communication materials.
5. Two (2) meetings with the President Director and Audit Committee to discuss the Main Audit Result Reports per Semester.
6. Twelve (12) meetings with the Audit Committee to check on the progress of monthly audit.
7. Forty-five (45) meetings with the President Director to check on the progress of weekly audit.

Work Plan and Realization of SKAI

In 2025, all audit activities were carried out according to the established work plan. Each stage of audit was completed on time, ensuring effective monitoring and evaluation of work units and supporting the achievement of the Bank's objectives. The audit objectives in 2025 were as follows:

Pemeriksaan Audit	**Objek Pemeriksaan Audit Object**
Operasional dan Kredit Cabang Branch Operations and Credit	30 Kantor Cabang/Cabang Pembantu 30 Branch Offices/Sub-Branches
Unit Kerja Bisnis Business Unit	6 Unit Kerja 6 Work Units
Unit Kerja *Supporting* Supporting Business Unit	8 Unit Kerja 8 Work Units
Objek Mandatori Mandatory Objectives	6 Objek Mandatori 6 Mandatory Objectives

Temuan dan Tindak Lanjut Hasil Audit

Selama tahun 2025, SKAI menyampaikan hasil audit kepada Dewan Komisaris dan Direksi yang memuat sejumlah temuan disertai rekomendasi perbaikan. Setiap rekomendasi ditindaklanjuti oleh *auditee*, dengan progres penyelesaian terus dipantau hingga tuntas. Dari total 911 temuan yang dihasilkan, sebanyak 874 temuan atau 95,94% telah diselesaikan, sementara 37 temuan atau 4,06% masih dalam proses penyelesaian.

Findings and Follow-Up on Audit Results

Throughout 2025, SKAI submitted audit results to the Board of Commissioners and Board of Directors, containing a number of findings and recommendations for improvement. Each recommendation was followed up by the auditee, with progress continuously monitored until completion. Of the total 911 findings generated, 874 findings or 95.94% were resolved, while 37 findings or 4.06% were still in settlement process.

Efektivitas dan Cakupan Audit Internal dalam Menilai Seluruh Aspek dan Unsur Kegiatan Bank

Audit internal Bank dilaksanakan secara efektif dan komprehensif dengan cakupan penilaian atas seluruh aspek dan unsur kegiatan Bank, meliputi operasional, keuangan, manajemen risiko, kepatuhan, teknologi informasi, dan tata kelola, melalui pendekatan berbasis risiko dan rencana

Effectiveness and Scope of Internal Audit in Assessing All Aspects and Elements of the Bank's Activities

The Bank's internal audit was carried out effectively and comprehensively, with assessments covering all aspects and elements of the Bank's activities, including operations, finance, risk management, compliance, information technology, and governance, through risk-based approach

audit tahunan. Efektivitas audit internal tercermin dari kemampuan SKAI dalam mengidentifikasi kelemahan pengendalian internal, memberikan rekomendasi perbaikan yang relevan, serta memantau tindak lanjut secara berkelanjutan, yang hasilnya dilaporkan kepada Direksi dan Dewan Komisaris guna mendukung peningkatan kualitas pengendalian internal, kepatuhan, dan penerapan GCG.

Pelatihan dan/atau Peningkatan SKAI

Pada tahun 2025, SKAI berpartisipasi dalam sejumlah program pelatihan dan pengembangan kompetensi, baik internal maupun eksternal, sebanyak 38 kali, dengan materi, antara lain:

1. *Financial Integrity Rating* 2025 dan Tindak Pidana Pencucian Uang – Diselenggarakan oleh Andara Sarana.
2. Peningkatan Fungsi Pengendalian Internal Bank – Diselenggarakan oleh Andara Sarana.
3. *Building a Fraud-Resilient Bank: From Detection to Response* – Diselenggarakan oleh Victoria Institute.
4. Strategi dan Implementasi Pelindungan Konsumen dan Data Pribadi – Diselenggarakan oleh Victoria Institute.
5. *Driving Branch Productivity Through Effective Leadership* dari – Diselenggarakan oleh Edcore Indonesia.
6. Transformasi Digital IT Perbankan – Diselenggarakan oleh Lembaga Pengembangan Perbankan Indonesia.
7. *IT Audit Fundamental* – Diselenggarakan oleh SGI Asia.
8. *IT Risk Management* – Diselenggarakan oleh Acumen Advice.
9. *Auditing Treasury Business* – Diselenggarakan oleh Ikatan Audit Internal Bank.
10. Sistem Pengendalian Intern – Diselenggarakan oleh Dakara Kreasi.
11. *Remittance* – Diselenggarakan oleh BNI Corporate University.
12. Indentifikasi Transaksi Keuangan Mencurigakan dan Penentuan Indikasi Tindak Pidana Asal – Diselenggarakan oleh Forum Komunikasi Direktur Kepatuhan Perbankan.
13. ISO 20022 Pacs.008 dan Pacs.009 *SWIFT* – Diselenggarakan oleh Asosiasi SWIFT Indonesia.
14. Perdagangan Berjangka Komoditi, Resi Gudang, dan Aset Kripto – Diselenggarakan oleh Asosiasi Perusahaan Pembiayaan Indonesia.

and annual audit plan. The effectiveness of internal audit is reflected in SKAI ability to identify internal control weaknesses, provide relevant recommendations for improvement, and monitor follow-up actions on an ongoing basis. The results are reported to the Board of Directors and Board of Commissioners to support quality improvements in internal control, compliance, and GCG implementation.

SKAI Training and/or Development Programs

In 2025, SKAI participated in a number of training and competency development programs, both internal and external, a total of 38 programs, with topics including:

1. Financial Integrity Rating 2025 and Money Laundering Crimes – Organized by Andara Sarana.
2. Enhancing Bank Internal Control Functions – Organized by Andara Sarana.
3. Building a Fraud-Resilient Bank: From Detection to Response – Organized by Victoria Institute.
4. Strategy and Implementation of Consumer and Personal Data Protection – Organized by Victoria Institute.
5. Driving Branch Productivity Through Effective Leadership – Organized by Edcore Indonesia.
6. Digital Transformation of Banking IT – Organized by Indonesian Banking Development Institute.
7. IT Audit Fundamental – Organized by SGI Asia.
8. IT Risk Management – Organized by Acumen Advice.
9. Auditing Treasury Business – Organized by the Bank Internal Audit Association.
10. Internal Control System – Organized by Dakara Kreasi.
11. Remittance – Organized by BNI Corporate University.
12. Identification of Suspicious Financial Transactions and Determination of Indications of Predicate Crimes – Organized by the Communication Forum for Director of Banking Compliance.
13. ISO 20022 Pacs.008 and Pacs.009 SWIFT – Organized by Indonesian SWIFT Association.
14. Commodity Futures Trading, Warehouse Receipts, and Crypto Assets – Organized by Indonesian Financing Companies Association.

Akuntan Publik
Public Accountant

Kebijakan Penunjukan Akuntan Publik

Mengacu pada ketentuan Peraturan Otoritas Jasa Keuangan No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan Bank serta Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan, serta keputusan RUPS Tahunan tanggal 20 Juni 2025 berdasarkan rekomendasi Dewan Komisaris dan Komite Audit, Bank menunjuk Yovita bersama Kantor Akuntan Publik Purwanto Susanti & Surja (*member of* Ernst & Young) yang terdaftar di Otoritas Jasa Keuangan sebagai auditor Laporan Keuangan Konsolidasian tahun buku 2025. Dalam pelaksanaannya, auditor tersebut menjalankan tugas secara independen, kompeten, profesional, dan objektif sesuai Standar Profesional Akuntan Publik, sehingga laporan keuangan Bank dapat disajikan secara wajar dan transparan.

Policy in Appointing Public Accountant

Referring to the provisions of Financial Services Authority Regulation No. 37/POJK.03/2019 on Transparency and Publication of Bank Reports and Financial Services Authority Regulation No. 9 of 2023 on the Use of Services of Public Accountant and Public Accounting Firm in Financial Services Activities, as well as Annual GMS resolutions dated 20 June 2025 based on the recommendations of the Board of Commissioners and Audit Committee, the Bank appointed Yovita together with Public Accounting Firm Purwanto Susanti & Surja (member of Ernst & Young), registered with the Financial Services Authority as auditor of the Consolidated Financial Statements for the 2025 fiscal year. In its implementation, the auditor carries out duties independently, competently, professionally, and objectively in accordance with Public Accountant Professional Standards, and therefore, the Bank's financial statements can be presented in a fair and transparent manner.

Periode Akuntan Publik dan Kantor Akuntan Publik

Bank senantiasa mematuhi ketentuan Peraturan Otoritas Jasa Keuangan No. 9 Tahun 2023 terkait penunjukan akuntan publik dan kantor akuntan publik. Sesuai regulasi, penggunaan akuntan publik dibatasi maksimal 7 (tujuh) tahun berturut-turut, sementara evaluasi terhadap kantor akuntan publik dilakukan oleh Komite Audit berdasarkan penilaian risiko. Pada tahun 2025, Bank menunjuk Akuntan Publik Yovita untuk yang kelima kalinya melalui Kantor Akuntan Publik Purwanto Susanti & Surja (*member of* Ernst & Young), dengan persetujuan Otoritas Jasa Keuangan sebagaimana tercantum dalam Surat No. 8091/PSS/2025 tanggal 12 November 2025.

Adapun daftar akuntan publik dan kantor akuntan publik yang digunakan Bank dalam 5 (lima) tahun terakhir sebagai berikut:

Period of Public Accountant and Public Accounting Firm

The Bank consistently complies with the provisions of Financial Services Authority Regulation No. 9 of 2023 on the appointment of public accountant and public accounting firm. According to regulations, the use of public accountant is limited to a maximum of 7 (seven) consecutive years, while evaluation of public accounting firm is conducted by the Audit Committee based on risk assessment. In 2025, the Bank appointed Public Accountant Yovita for the fifth time through Public Accounting Firm Purwanto Susanti & Surja (member of Ernst & Young), with the approval of the Financial Services Authority as stated in Letter No. 8091/PSS/2025 dated 12 November 2025.

The list of public accountants and public accounting firms used by the Bank in the past 5 (five) years is as follows:

Tahun Buku Fiscal Year	Kantor Akuntan Publik	Akuntan Publik Public Accountant	Nomor Izin Akuntan Publik Public Accountant License Number	Masa Kontrak Contract Period	Biaya Fee (Rp)
2025	Purwanto Susanti & Surja (*member of* Ernst & Young)	Yovita	AP. 0242	Januari-Desember January-December	2,050,000,000

Tahun Buku Fiscal Year	Kantor Akuntan Publik	Akuntan Publik Public Accountant	Nomor Izin Akuntan Publik Public Accountant License Number	Masa Kontrak Contract Period	Biaya Fee (Rp)
2024	Purwantono Sungkoro & Surja (*member of* Ernst & Young)	Yovita	AP. 0242	Januari-Desember January-December	1,720,000,000
2023					1,650,000,000
2022					2,320,000,000
2021					1,550,000,000

Jasa Non-Audit yang Diberikan Akuntan Publik

Pada tahun 2025, tidak terdapat jasa lain yang diberikan oleh Kantor Akuntan Publik Purwanto Susanti & Surja selain jasa audit Laporan Keuangan Tahun Buku 2025. Dengan demikian, tidak terdapat biaya yang dikeluarkan untuk jasa non-audit.

Non-Auditing Services Provided by Public Accountant

In 2025, there were no other services provided by Public Accounting Firm Purwanto, Susanti & Surja other than auditing services for Financial Statements for 2025 fiscal year. As such, there was no expense incurred for non-audit services.

Efektivitas Pelaksanaan Audit oleh Akuntan Publik

Komite Audit secara proaktif menjalin komunikasi dengan akuntan publik dan kantor akuntan publik yang ditunjuk sebelum audit dimulai untuk menyampaikan hal-hal yang menjadi fokus pengawasan. Setelah audit selesai, Komite Audit melakukan evaluasi atas pelaksanaan audit dan menyampaikan hasilnya kepada Otoritas Jasa Keuangan.

Effectiveness of Audit Implementation by Public Accountant

Audit Committee proactively communicates with the appointed public accountant and public accounting firm prior to the commencement of audit to convey matters of focus for oversight. Upon audit completion, Audit Committee evaluates audit implementation and submits the results to the Financial Services Authority.

Efektivitas Audit Eksternal dan Kepatuhan terhadap Ketentuan Hubungan dengan Akuntan Publik dan Otoritas Jasa Keuangan

Bank menerapkan fungsi audit eksternal secara efektif sebagai bagian dari upaya menjaga integritas, transparansi, dan keandalan laporan keuangan. Pelaksanaan audit eksternal dilakukan oleh akuntan publik dan/atau kantor akuntan publik yang independen, kompeten, serta terdaftar dan memenuhi ketentuan Otoritas Jasa Keuangan. Bank memastikan bahwa hubungan dengan akuntan publik dan/atau kantor akuntan publik dilaksanakan sesuai dengan prinsip independensi, objektivitas, dan profesionalisme, termasuk dalam proses penunjukan, ruang lingkup audit, serta komunikasi hasil audit. Selain itu, Bank mematuhi seluruh ketentuan yang mengatur hubungan antara Bank, akuntan publik dan/atau kantor akuntan publik, serta Otoritas Jasa Keuangan, termasuk kewajiban pelaporan dan penyampaian informasi secara tepat waktu. Hasil audit eksternal dimanfaatkan sebagai dasar evaluasi dan perbaikan berkelanjutan guna meningkatkan kualitas tata kelola dan pengendalian internal Bank.

Effectiveness of External Audit and Compliance with Provisions on Relationships with Public Accountant and Financial Services Authority

The Bank implements external audit function effectively as an effort to maintain integrity, transparency, and reliability of its financial statements. External audit is conducted by independent, competent, and registered public accountant and/or public accounting firm that comply with the requirements of Financial Services Authority. The Bank ensures that relationships with public accountant and/or public accounting firm are conducted in accordance with the principles of independence, objectivity, and professionalism, including in appointment process, audit scope, and communication of audit results. Furthermore, the Bank complies with all provisions governing the relationship between the Bank, public accountant and/or public accounting firm, and Financial Services Authority, including the obligation to report and submit information in a timely manner. The external audit results are used as a basis for evaluation and continuous improvement to enhance the quality of the Bank's governance and internal control.

Pengawasan dan Komunikasi Akuntan Publik dan Bank

Bank mewajibkan akuntan publik untuk mengomunikasikan rencana metodologi dan sampel audit kepada Komite Audit serta Auditor Internal sebelum proses audit dimulai. Selanjutnya, Komite Audit bersama Auditor Internal melakukan pengawasan atas kelancaran dan kesesuaian pelaksanaan audit eksternal, sekaligus mengevaluasi kualitas proses audit tersebut. Pemantauan kinerja akuntan publik dan kantor akuntan publik dibahas dalam rapat Komite Audit yang melibatkan Auditor Internal dan Direksi terkait, termasuk tindak lanjut atas temuan audit, sehingga hasil audit yang dihasilkan lebih komprehensif dan optimal.

Supervision and Communication of Public Accountant and the Bank

The Bank requires the public accountant to communicate the planned audit methodology and sample to the Audit Committee and Internal Auditor before the audit process begins. Furthermore, Audit Committee, together with Internal Auditor, oversees the smooth and appropriate implementation of external audit and evaluates the quality of audit process. Monitoring of the performance of public accountant and public accounting firm is discussed in Audit Committee meetings involving Internal Auditor and relevant Board of Directors, including follow-up on audit findings, resulting in more comprehensive and optimal audit results.

Sistem Pengendalian Internal
Internal Control System

Bank mengimplementasikan Sistem Pengendalian Intern (SPI) sebagai mekanisme utama untuk mendukung pencapaian tujuan, mengidentifikasi serta mengelola potensi risiko. SPI dirancang guna menjaga operasional yang sehat dan terkendali, melindungi aset Bank, memastikan keandalan pelaporan, meningkatkan kepatuhan, meminimalkan risiko kerugian maupun penyimpangan, serta mendorong efisiensi dan efektivitas operasional.

The Bank implements Internal Control System (SPI) as the primary mechanism to support the achievement of objectives and identify and manage potential risks. SPI is designed to maintain sound and controlled operations, protect Bank assets, ensure reporting reliability, enhance compliance, minimize the risk of loss or irregularities, and promote operational efficiency and effectiveness.

Ruang Lingkup Pengendalian Internal

Pelaksanaan SPI di Bank berpedoman pada Surat Edaran Otoritas Jasa Keuangan No. 35/SEOJK.03/2017 tentang Pedoman Standar Pengendalian Internal bagi Bank Umum. Implementasi SPI menjadi tanggung jawab seluruh jenjang organisasi dengan keterlibatan aktif setiap pihak, meliputi:

1. Direksi
   Bertanggung jawab menciptakan dan memelihara pengendalian internal yang efektif, serta memastikan bahwa sistem tersebut berjalan secara aman dan andal sesuai dengan tujuan pengendalian internal yang telah ditetapkan oleh Bank.
2. Dewan Komisaris
   Bertanggung jawab mengawasi pelaksanaan pengendalian internal secara umum, termasuk kebijakan Direksi yang menetapkan pengendalian internal.
3. SKAI
   Bertanggung jawab mengevaluasi dan berperan aktif dalam meningkatkan efektivitas pengendalian

Internal Control Scope

SPI implementation at the Bank is guided by Financial Services Authority Circular No. 35/SEOJK.03/2017 on Guidelines for Internal Control Standards for Commercial Banks. SPI Implementation is the responsibility of all levels of the organization, with the active involvement of all parties, including:

1. Board of Directors
   Responsible for creating and maintaining effective internal control, and ensuring that the system runs safely and reliably in accordance with the internal control objectives specified by the Bank.
2. Board of Commissioners
   Responsible for supervising the implementation of internal control in general, including the Board of Directors' policies that establish internal control.
3. SKAI
   Responsible for evaluating and taking an active role in improving the effectiveness of internal control on

internal secara berkesinambungan, berkaitan dengan pelaksanaan operasional Bank yang berpotensi menimbulkan kerugian dalam pencapaian sasaran yang telah ditetapkan oleh manajemen. Terkait hal ini, Bank senantiasa memastikan agar jalur pelaporan telah memadai dan auditor internal telah memiliki keahlian, khususnya terkait praktik dan penerapan penilaian risiko.

4. Pejabat Eksekutif dan Karyawan
   Bertanggung jawab melaksanakan pengendalian internal yang telah ditetapkan oleh manajemen Bank. Melalui pengendalian internal yang efektif, tanggung jawab Pejabat Eksekutif dan karyawan Bank akan meningkat, mendorong budaya risiko yang memadai, serta mempercepat proses identifikasi terhadap praktik perbankan yang tidak sehat dan terhadap organisasi melalui sistem deteksi dini yang efisien.
5. Pihak Eksternal
   Antara lain meliputi Otoritas Jasa Keuangan, auditor eksternal, dan nasabah Bank yang berkepentingan terhadap terlaksananya pengendalian internal yang andal dan efektif.

Dewan Komisaris dan Direksi juga memiliki peran penting dalam memastikan komitmen, perilaku, kepedulian, dan penerapan pengendalian internal yang efektif di seluruh kegiatan operasional Bank. Sebagai bagian dari tanggung jawab ini, Dewan Komisaris dan Direksi menetapkan elemen-elemen penting dalam lingkungan pengendalian, yaitu:

1. Struktur organisasi yang memadai.
2. Gaya kepemimpinan dan filosofi manajemen Bank.
3. Integritas dan nilai-nilai etika, serta kompetensi seluruh karyawan.
4. Kebijakan dan prosedur HC Bank.
5. Atensi dan arahan manajemen Bank dan Komite lainnya, seperti Komite Pemantau Risiko.
6. Faktor-faktor eksternal yang memengaruhi operasional Bank dan penerapan manajemen risiko.

Berbagai faktor penting yang menjadi pertimbangan dalam menetapkan unsur-unsur lingkungan pengendalian dan mengimplementasikan pengendalian internal meliputi:

1. Total aset.
2. Jenis produk dan aktivitas yang ditawarkan, termasuk produk dan aktivitas baru.
3. Kompleksitas operasional, termasuk jaringan kantor.
4. Profil risiko dari setiap kegiatan usaha.
5. Metode yang digunakan untuk pengolahan data dan teknologi informasi, serta metodologi yang diterapkan untuk pengukuran, pemantauan, dan pembatasan (limit) risiko.
6. Ketentuan dan peraturan perundang-undangan.

an ongoing basis, in relation to the implementation of the Bank's operations that may potentially incur losses in achieving the targets specified by the management. In this regard, the Bank consistently ensures that reporting channels are adequate and that internal auditors have the expertise, particularly regarding the practice and application of risk assessments.

4. Executive Officers and Employees
   Responsible for implementing the internal control established by the Bank's management. Through effective internal control, the responsibilities of Executive Officers and Bank employees will improve and promote an adequate risk culture, as well as accelerate the process of identifying unhealthy banking practices and organization through an efficient early-detection system.
5. External Parties
   Among others including the Financial Services Authority, external auditors, and Bank's customers who have an interest in the implementation of reliable and effective internal controls.

The Board of Commissioners and Board of Directors also have an important role in ensuring effective commitments, behaviors, concerns, and implementation of internal controls throughout the Bank's operational activities. As part of this responsibility, the Board of Commissioners and Board of Directors established important elements in controlled environment, namely:

1. Sufficient organizational structure.
2. Bank's leadership style and management philosophy.
3. Integrity and ethical values, as well as the competence of all employees.
4. Bank's HC policies and procedures.
5. Attention and direction of the Bank's management and other Committees, such as Risk Monitoring.
6. External factors affecting the Bank's operations and the risk management implementation.

Various important factors that are considered in establishing the elements of controlled environment and implementing internal control include:

1. Total assets.
2. The types of products and activities offered, including new products and activities.
3. Operational complexity, including office network.
4. Risk profile of each business activity.
5. Methods used for data and information technology processing, as well as methodology applied for risk measurement, monitoring, and limit.
6. Provisions and laws and regulations.

Kesesuaian Pengendalian Internal dengan Kerangka COSO

Penerapan SPI di Bank bertujuan untuk menjamin efektivitas operasional, keandalan pelaporan, dan kepatuhan terhadap ketentuan yang berlaku. Kerangka SPI mengacu pada standar yang dikembangkan oleh *Committee of Sponsoring Organizations of the Treadway Commission* (COSO), yang membagi pengendalian internal ke dalam 5 (lima) komponen utama yang saling terintegrasi, yaitu:

1. Lingkungan pengendalian.
2. Penilaian risiko.
3. Aktivitas pengendalian.
4. Informasi dan komunikasi.
5. Kegiatan pemantauan.

Komponen Pengendalian Internal

Pengendalian internal di Bank terdiri atas 5 (lima) komponen yang saling terintegrasi, dengan penjelasan sebagai berikut:

1. **Pengawasan oleh Manajemen dan Budaya Pengendalian**
   a. Dewan Komisaris bertanggung jawab untuk mengesahkan dan mengkaji kebijakan dan strategi usaha Bank, memahami dan mengendalikan risiko utama Bank, menetapkan struktur organisasi, dan memastikan pemantauan efektivitas implementasi SPI.
   b. Direksi bertanggung jawab untuk melaksanakan kebijakan dan strategi Dewan Komisaris, mengembangkan prosedur pengendalian risiko, mempertahankan struktur organisasi yang jelas, menetapkan kebijakan dan prosedur pengendalian internal, dan memantau efektivitas SPI.

   Dalam melaksanakan tanggung jawab tersebut, Dewan Komisaris dan Direksi bertanggung jawab untuk meningkatkan etika kerja dan integritas dalam menciptakan budaya organisasi yang menekankan pentingnya pengendalian internal di Bank. Hal ini dilakukan dengan:
   a. Menjadi panutan bagi seluruh karyawan, dengan komitmen pribadi tinggi terhadap pengembangan Bank yang sehat.
   b. Mengelola HC dengan menempatkan karyawan sesuai keterampilan, pengetahuan, dan perilaku.
   c. Meningkatkan kesadaran karyawan tentang efektivitas tugas dan tanggung jawab mereka, serta mendorong karyawan untuk mengomunikasikan setiap permasalahan dalam kegiatan operasional Bank kepada manajemen terkait.

Conformity of Internal Control with COSO Framework

SPI implementation at the Bank aims to ensure operational effectiveness, reporting reliability, and compliance with applicable regulations. SPI framework refers to the standards developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO), which divides internal control into 5 (five) main integrated components, namely:

1. The controlled environment.
2. Risk assessment.
3. Controlled activities.
4. Information and communication.
5. Monitoring activity.

Internal Control Components

The Bank's internal control consists of 5 (five) integrated components, as explained below:

1. **Control by the Management and Control Culture**

   a. The Board of Commissioners is responsible for validating and reviewing the Bank's business policies and strategies, understanding and controlling the Bank's main risks, determining the organizational structure, and ensuring the monitoring of the effectiveness of SPI implementation.
   b. The Board of Directors is responsible for implementing policies and strategies of the Board of Commissioners, developing risk control procedure, maintaining a clear organizational structure, establishing internal control policies and procedures, and monitoring the effectiveness of SPI.

   In carrying out these responsibilities, the Board of Commissioners and Board of Directors are responsible for improving work ethics and integrity in creating an organizational culture that emphasizes the importance of internal control in the Bank. This is done by:

   a. Being role models to all employees, with a high personal commitment to the development of a sound Bank.
   b. Managing HC by placing employees in accordance with their skills, knowledge, and behavior.
   c. Raising employee awareness on the effectiveness of their duties and responsibilities, and encouraging employees to communicate to relevant management regarding every problem in the Bank's operational activities.

Seluruh kebijakan, standar, dan prosedur operasional didokumentasikan untuk mendukung efisiensi penerapan budaya pengendalian. Bank juga mengelola kebijakan untuk menghindari peluang penyimpangan atau pelanggaran guna memperkuat nilai-nilai etika.

2. Identifikasi dan Penilaian Risiko

Untuk mengidentifikasi, menganalisis, dan menilai risiko yang dihadapi, Direksi Bank melakukan penilaian risiko. Bank secara berkelanjutan memantau dan mengidentifikasi semua jenis risiko, menetapkan limit dan teknik pengendalian risiko dengan bantuan auditor internal sehingga cakupan audit lebih luas. Jika risiko belum terkendali, Bank akan melakukan peninjauan ulang pengendalian internal.

3. Kegiatan Pengendalian Internal dan Pemisahan Fungsi

Kegiatan pengendalian internal di Bank direncanakan dan dipantau secara efektif. Kegiatan pengendalian internal Bank mencakup kebijakan, prosedur, dan praktik yang diuraikan sebagai berikut:

a. Kaji Ulang Manajemen
   Direksi sebagai *top level management* melakukan kaji ulang melalui rapat berkala bersama Dewan Komisaris dan SKAI. Rapat tersebut membahas Laporan Hasil Pemeriksaan Audit untuk kaji ulang hasil pemeriksaan rutin dan khusus.
b. Kaji Ulang Kinerja Operasional
   SKAI secara rutin berkomunikasi dengan komite-komite di bawah Direksi, seperti ALCO, Komite Manajemen Risiko, dan Komite GCG untuk memastikan pengendalian internal pada level operasional.
c. Pengendalian Sistem Informasi
   Bank menerapkan pengendalian internal pada sistem informasi dan teknologi melalui audit rutin di Divisi *Information Technology* dan Divisi *Business Analytic and MIS*.
d. Pengendalian Aset Fisik
   Pengendalian atas aset fisik dilakukan melalui audit tahunan di Divisi *Human Capital Management & General Affair* untuk memastikan keamanan fisik aset Bank.
e. Dokumentasi
   Formalisasi dan pendokumentasian kebijakan, prosedur, sistem, standar akuntansi, dan proses audit dengan memadai. Selain itu, melakukan pembaruan berkala terhadap kebijakan dan SOP yang selanjutnya disampaikan kepada pejabat dan karyawan untuk mengakomodir kebutuhan Bank secara aktual.

All of the operational policies, standards, and procedures are documented to support the efficient implementation of the control culture. The Bank also manages policy to avoid opportunities of deviation or violation in order to strengthen ethical value.

2. Risk Identification and Assessment

To identify, analyze, and assess risks that will be faced, the Bank's Board of Directors conducts risk assessment. The Bank continuously monitors and identifies all types of risks, establishes such risk limit and control technique with the assistance of the internal auditor for wider audit coverage. In the event that the risk has not been controlled, the Bank will re-assess the internal control.

3. Activities of Internal Control and Separation of Functions

Internal control activities at the Bank are planned and monitored effectively. The Bank's internal control activities include policies, procedures, and practices described as follows:

a. Management Review
   The Board of Directors as top-level management reviews through regular meetings with the Board of Commissioners and SKAI. Such meetings discuss the Audit Result Report to review the results of routine and special audits.
b. Operational Performance Review
   SKAI regularly communicates with committees under the Board of Directors, such as ALCO, Risk Management Committee, and GCG Committee to ensure that internal control is at the operational level.
c. Information System Control
   The Bank implements internal control over information and technology system through routine audit in Information Technology Division and Business Analytic and MIS Division.
d. Control of Physical Assets
   Physical asset control is performed through annual audit to Human Capital Management & General Affair Division to ensure the physical security of the Bank's assets.
e. Documentation
   Formalizing and documenting policies, procedures, systems, accounting standards, and audit process adequately. In addition, periodically renewing the policies and SOP which are then conveyed to officials and employees to accommodate the Bank's actual requirements.

Bank juga menerapkan prinsip pemisahan fungsi dalam kegiatan pengendalian internal untuk mencapai efektivitas dan mencegah kesalahan atau penyimpangan di setiap level organisasi. Prinsip pemisahan fungsi ini diwujudkan melalui Keputusan Direksi No. 031F/SK-DIR/05/23 tanggal 31 Mei 2023 tentang Pendelegasian Wewenang Biaya Unit Kerja *General Affair*.

The Bank also applies the principle of separation of functions in internal control activities to achieve effectiveness and prevent mistakes or deviations at every organizational level. This principle of function separation is manifested through the Board of Directors' Decision Letter No. 031F/SK-DIR/05/23 dated 31 May 2023 on Authorization Delegation of the General Affair Work Unit's Cost.

4. **Sistem Akuntansi, Informasi, dan Komunikasi**

   Sistem akuntansi mencakup metode dan catatan untuk mengidentifikasi, mengelompokkan, menganalisis, mengklasifikasi, mencatat, dan melaporkan transaksi sesuai standar akuntansi di Indonesia. Sementara itu, sistem informasi dikelola dengan baik dan diperbarui secara berkala untuk menghasilkan laporan yang akurat dan tepat waktu mengenai kegiatan usaha, kondisi keuangan, manajemen risiko, dan pemenuhan ketentuan. Pengelolaan sistem informasi mencakup rencana pemulihan darurat dan *backup* untuk mencegah kegagalan usaha yang berisiko tinggi. Adapun sistem komunikasi dikelola agar dapat memberikan informasi secara tepat waktu kepada semua pihak, baik internal maupun eksternal.

4. **Accounting, Information, and Communication Systems**

   The accounting system includes methods and records to identify, group, analyze, classify, record, and report transactions in accordance with accounting standards in Indonesia. Meanwhile, the information system is properly managed and updated periodically in order to produce accurate and timely reports on business activities, financial conditions, risk management, and compliance with provisions. The management of information system includes contingency recovery plans and back up to prevent high risk business failures. The communication system is managed to provide timely information to all parties, both internal and external.

5. **Kegiatan Pemantauan dan Tindakan Koreksi Penyimpangan**

   Bank secara berkala melakukan pemantauan dan evaluasi terhadap risiko utama, baik oleh Unit Kerja Operasional (*risk taking unit*) maupun oleh SKAI. Auditor internal melakukan pemeriksaan operasional dan keuangan di berbagai kantor Bank, mencakup perkreditan, Dana Pihak Ketiga (DPK), penerapan APU dan PPT, *Know Your Customer* (KYC), teller dan uang tunai, *security*, *service excellence*, Laporan Keuangan, gedung dan inventaris, dan lainnya. Setiap kelemahan dalam pengendalian internal yang diidentifikasi oleh unit risiko, auditor internal, ataupun pihak lain akan segera dilaporkan kepada pejabat atau Direksi yang berwenang untuk ditindaklanjuti.

5. **Monitoring Activities and Corrective Actions**

   The Bank periodically monitors and evaluates primary risks, both by the Operating Unit (risk taking unit) and by SKAI. Internal auditor conducts operational and financial auditing checks in various Bank's offices, including credit, Third Party Funds (DPK), AML and CTF implementation, Know Your Customer (KYC), tellers and cash, security, service excellence, Financial Statements, building and inventory, and others. Any weaknesses in internal control identified by risk taking units, internal auditors, or other parties must be immediately reported to the authorized officers or Directors for follow-up.

Tinjauan atas Efektivitas Sistem Pengendalian Internal 2025

SPI Bank dirancang untuk mengelola risiko secara efektif, bukan menghilangkannya sepenuhnya. Pengawasan atas efektivitas SPI dilakukan oleh SKAI, dengan hasil evaluasi dilaporkan kepada Direksi serta disampaikan kepada Dewan Komisaris melalui Komite Audit. Pada tahun 2025, hasil evaluasi menunjukkan bahwa SPI Bank masih sejalan dengan prinsip pengendalian internal dan berfungsi dengan baik. Permasalahan terkait kecukupan pengendalian telah

Overview of the Effectiveness of Internal Control System in 2025

The Bank's SPI is designed to effectively manage risk, not eliminate it completely. Oversight of SPI effectiveness is carried out by SKAI, with evaluation results reported to the Board of Directors and then submitted to the Board of Commissioners through Audit Committee. In 2025, the evaluation results indicated that the Bank's SPI remained in line with internal control principles and was functioning well. Issues related to the adequacy of control were

dilaporkan kepada Direksi, dan langkah perbaikan telah dilakukan untuk meminimalkan risiko, yang selanjutnya juga dilaporkan kepada Dewan Komisaris melalui Komite Audit.

reported to the Board of Directors, and corrective measures were implemented to minimize risk, then reported to the Board of Commissioners through Audit Committee.

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Sistem Pengendalian Internal

Dewan Komisaris dan Direksi menegaskan bahwa sepanjang tahun 2025, Bank telah memiliki SPI yang efektif dan memadai dalam mengelola risiko. Seluruh risiko yang muncul tetap berada dalam batas toleransi, sehingga mendukung tercapainya tujuan Bank, antara lain melalui operasional yang efisien, penyajian Laporan Keuangan yang andal, perlindungan aset, serta kepatuhan terhadap ketentuan hukum dan peraturan yang berlaku.

Statement of Board of Commissioners and Board of Directors on the Internal Control System Adequacy

The Board of Commissioners and Board of Directors confirmed that throughout 2025, the Bank had an effective and adequate SPI for managing risk. All risks emerging remained within tolerable limits, thus supporting the achievement of the Bank's objectives, including through efficient operations, reliable financial reporting, asset protection, and compliance with applicable laws and regulations.

Pengendalian Internal atas Pelaporan Keuangan

Internal Control over Financial Reporting

Bank Victoria menyampaikan Memorandum No. 004/ATF-DIR/I/2026 tanggal 13 Januari 2026 dari *Internal Control Over Financial Reporting* Departemen kepada *Director of Compliance & Risk Management* perihal Laporan Tahunan *Internal Control Over Financial Reporting* (ICOFR) Posisi 31 Desember 2025. Sehubungan dengan hal tersebut, Bank Victoria menerapkan ICOFR sebagai bagian dari sistem pengendalian internal yang dirancang untuk memastikan keandalan, keakuratan, dan transparansi laporan keuangan sesuai dengan standar akuntansi dan ketentuan peraturan perundang-undangan yang berlaku, termasuk Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank.

Bank Victoria submits Memorandum No. 004/ATF-DIR/I/2026 dated 13 January 2026 from the Internal Control Over Financial Reporting Department to the Director of Compliance & Risk Management regarding the Annual Report of Internal Control Over Financial Reporting (ICOFR) Position as of 31 December 2025. In that regard, Bank Victoria implements ICOFR as part of its internal control system designed to ensure the reliability, accuracy, and transparency of financial statements in accordance with accounting standards and applicable laws and regulations, including Financial Services Authority Regulation No. 15 of 2024 on the Integrity of Bank Financial Reporting.

ICOFR dilaksanakan melalui identifikasi dan pengelolaan risiko salah saji material, baik akibat kesalahan maupun kecurangan, dengan penerapan pengendalian pada tingkat entitas dan proses, termasuk dukungan sistem teknologi informasi, serta dievaluasi secara berkala guna memastikan efektivitasnya dalam mendukung integritas pelaporan keuangan Bank Victoria.

ICOFR is implemented through the identification and management of risks of material misstatement, either due to errors or fraud, through the implementation of controls at the entity and process levels, including information technology system support, and is periodically evaluated to ensure their effectiveness in supporting the integrity of Bank Victoria's financial reporting.

Pembentukan Unit dan Penguatan Kebijakan ICOFR

Pada Januari 2025, Bank Victoria telah membentuk *ICOFR Department* serta menetapkan Standar Operasional Prosedur (SOP) dan Kebijakan Integritas Pelaporan Keuangan sebagai landasan penerapan ICOFR di seluruh siklus pelaporan keuangan Bank. Pembentukan unit dan kebijakan tersebut merupakan wujud komitmen manajemen dalam memperkuat sistem pengendalian internal, memastikan konsistensi penerapan prinsip integritas, serta memberikan keyakinan memadai atas keandalan, keakuratan, dan transparansi laporan keuangan sesuai dengan ketentuan yang berlaku.

Tanggung Jawab Dewan Komisaris dan Direksi atas ICOFR

Dalam menjalankan fungsi pengawasan, Dewan Komisaris melalui Komite Audit melakukan pemantauan dan evaluasi secara berkala atas penerapan kebijakan dan prosedur pengendalian internal dalam proses pelaporan keuangan, guna memastikan efektivitas sistem pengendalian serta integritas informasi keuangan Bank Victoria. Direksi bertanggung jawab atas penyusunan dan penyajian laporan keuangan sesuai dengan Standar Akuntansi Keuangan (SAK) di Indonesia serta ketentuan Otoritas Jasa Keuangan dan memastikan bahwa informasi yang disajikan dalam laporan keuangan lengkap, benar, serta bebas dari salah saji material.

Hasil Tinjauan dan Evaluasi Penerapan ICOFR

ICOFR Department telah melakukan tinjauan ulang atas desain dan efektivitas pelaksanaan pengendalian pada proses transaksi, pembukuan, serta pelaporan keuangan di Divisi *Finance and Accounting*. Berdasarkan hasil evaluasi, terdapat kelemahan minor yang tidak berdampak material terhadap kewajaran penyajian laporan keuangan. Seluruh temuan telah ditindaklanjuti oleh unit terkait dan dimonitor oleh unit ICOFR hingga proses perbaikan dinyatakan selesai. Secara keseluruhan, pengendalian internal atas pelaporan keuangan Bank dinilai telah beroperasi secara efektif dan mampu memberikan keyakinan memadai atas keandalan laporan keuangan serta kepatuhan terhadap ketentuan yang berlaku.

Establishment of ICOFR Unit and Strengthening of Financial Reporting Policy

In January 2025, Bank Victoria established an ICOFR Department and established the Standard Operating Procedures (SOPs) and Financial Reporting Integrity Policy as the basis for implementing ICOFR throughout the Bank's financial reporting cycle. The establishment of this unit and policy demonstrates the management's commitment to strengthening internal control system, ensuring consistent application of integrity principles, and providing reasonable assurance regarding the reliability, accuracy, and transparency of financial statements in accordance with applicable regulations.

Responsibility of the Board of Commissioners and Board of Directors for ICOFR

In carrying out its supervisory function, the Board of Commissioners, through the Audit Committee, regularly monitors and evaluates the implementation of internal control policies and procedures in the financial reporting process to ensure the effectiveness of control system and integrity of Bank Victoria's financial information. The Board of Directors is responsible for the preparation and presentation of financial statements in accordance with Indonesian Financial Accounting Standards (SAK) and the provisions of Financial Services Authority, and ensures that the information presented in the financial statements is complete, accurate, and free from material misstatement.

Results of the Review and Evaluation of ICOFR Implementation

The ICOFR Department has reviewed the design and effectiveness of controls for transaction processing, bookkeeping, and financial reporting in the Finance and Accounting Division. Based on the evaluation results, there were minor weaknesses identified that did not materially impact the fairness of the presentation of the financial statements. All findings have been followed up by the relevant units and monitored by the ICOFR unit until the remedial process is declared complete. Overall, the Bank's internal control over financial reporting is considered to be operating effectively and providing reasonable assurance regarding the reliability of financial statements and compliance with applicable regulations.

Pelaporan Temuan dan Tindak Lanjut atas ICOFR

Seluruh permasalahan dan kelemahan pengendalian yang teridentifikasi dalam proses evaluasi ICOFR dilaporkan secara berkala kepada Direksi sebagai bagian dari mekanisme pengawasan dan penguatan tata kelola. Setiap temuan ditindaklanjuti secara konsisten oleh unit kerja terkait dengan pemantauan berkelanjutan hingga penyelesaiannya dinyatakan memadai, guna meminimalkan risiko serta memastikan kesesuaian dengan ketentuan internal dan regulasi yang berlaku.

Reporting of ICOFR Findings and Follow-up

All control issues and weaknesses identified during the ICOFR evaluation process are reported periodically to the Board of Directors as part of the oversight and governance strengthening mechanism. Every finding is consistently followed up by the relevant work unit through ongoing monitoring until its resolution is deemed adequate, to minimize risks and ensure compliance with internal provisions and applicable regulations.

Pernyataan atas Efektivitas ICOFR

Pada periode pelaporan tahun buku 2025, Bank Victoria menyatakan bahwa kerangka ICOFR telah dirancang secara memadai dan beroperasi secara efektif untuk mendukung keandalan pelaporan keuangan serta memastikan kepatuhan terhadap standar akuntansi dan ketentuan Otoritas Jasa Keuangan yang berlaku. Pernyataan ini disusun sebagai bagian dari komitmen Bank Victoria terhadap transparansi, akuntabilitas, dan integritas dalam penyampaian informasi kepada pemangku kepentingan melalui publikasi Laporan Tahunan.

Statement on ICOFR Effectiveness

For the 2025 fiscal year reporting period, Bank Victoria declared that the ICOFR framework was adequately designed and in operation effectively to support the reliability of financial reporting and ensure compliance with applicable accounting standards and Financial Services Authority regulations. This statement is prepared as part of Bank Victoria's commitment to transparency, accountability, and integrity in conveying information to stakeholders through the publication of Annual Report.

Fungsi Kepatuhan
Compliance Function

Fungsi Kepatuhan Bank berperan penting dalam memperkuat budaya kepatuhan sebagai bagian dari penerapan GCG. Fokus utamanya adalah upaya pencegahan terhadap risiko kepatuhan dengan memastikan seluruh kebijakan, prosedur, sistem, dan aktivitas usaha Bank senantiasa sejalan dengan peraturan Otoritas Jasa Keuangan serta ketentuan hukum yang berlaku, termasuk pemenuhan komitmen kepada regulator secara tepat waktu.

The Bank's Compliance Function plays a crucial role in strengthening a culture of compliance as part of GCG implementation. Its main focus is preventive measures against compliance risks by ensuring that all Bank policies, procedures, systems, and business activities are consistently in line with Financial Services Authority regulations and applicable laws, including timely fulfillment of commitments to regulators.

Pedoman Fungsi Kepatuhan

Fungsi Kepatuhan dijalankan berdasarkan ketentuan Peraturan Otoritas Jasa Keuangan No. 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan bagi Bank Umum, yang menjadi acuan utama dalam pelaksanaan tugas dan tanggung jawabnya.

Compliance Function Charter

The Compliance Function is implemented in accordance with Financial Services Authority Regulation No. 46/POJK.03/2017 on the Implementation of Compliance Function for Commercial Banks, which serves as the primary reference in performing its duties and responsibilities.

Penanggung Jawab Fungsi Kepatuhan

Untuk memastikan efektivitas penerapan Fungsi Kepatuhan, Bank telah menugaskan Direktur Kepatuhan dan Manajemen Risiko beserta Divisi *Compliance, System Procedure & Coordinator Customer Protection* sebagai pihak yang bertanggung jawab atas pelaksanaannya. Pengawasan atas fungsi tersebut dilakukan secara aktif oleh Dewan Komisaris, dengan pembagian tugas dan tanggung jawab masing-masing pihak sebagai berikut:

1. **Dewan Komisaris**
   a. Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling sedikit 2 (dua) kali dalam setahun.
   b. Berdasarkan hasil evaluasi pelaksanaan fungsi kepatuhan, Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan fungsi kepatuhan kepada Direktur Utama dengan tembusan kepada Direktur Kepatuhan dan Manajemen Risiko.

2. **Direktur Kepatuhan dan Manajemen Risiko**
   a. Merumuskan strategi guna mendorong terciptanya budaya kepatuhan Bank.
   b. Mengusulkan kebijakan kepatuhan atau prinsip-prinsip kepatuhan yang akan ditetapkan oleh Direksi.
   c. Menetapkan sistem dan prosedur kepatuhan yang digunakan untuk menyusun ketentuan dan pedoman internal Bank.
   d. Memastikan bahwa seluruh kebijakan, ketentuan, sistem, dan prosedur, serta kegiatan usaha yang dilakukan Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
   e. Meminimalkan risiko kepatuhan Bank.
   f. Melakukan tindakan pencegahan agar kebijakan dan/atau keputusan yang diambil Direksi Bank tidak menyimpang dari ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
   g. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

   Terkait dengan pelaksanaan tata kelola, maka Direktur Kepatuhan dan Manajemen Risiko yang telah ditunjuk sebagai Direktur *in Charge* dapat merumuskan langkah-langkah strategis dalam mendukung dan meningkatkan efektivitas penerapan fungsi kepatuhan, penerapan manajemen risiko, serta penerapan tata kelola. Pelaporan pelaksanaan tugas dan tanggung jawab dari fungsi kepatuhan kepada regulator dilakukan oleh Direktur Kepatuhan dan Manajemen Risiko dengan tembusan kepada Dewan Komisaris paling kurang secara triwulan.

Person in Charge of the Compliance Function

To ensure the effective implementation of Compliance Function, the Bank has assigned the Director of Compliance and Risk Management and the Compliance, System Procedure & Coordinator Customer Protection Division to be responsible for its implementation. Oversight of this function is actively carried out by the Board of Commissioners, with the division of duties and responsibilities of each party as follows:

1. **Board of Commissioners**
   a. Evaluating the implementation of the Bank's compliance function at least 2 (two) times a year.
   b. Based on the evaluation results of implementation of compliance function, the Board of Commissioners provides suggestions to improve the quality of compliance function to the President Director with a copy to the Director of Compliance and Risk Management.

2. **Director of Compliance and Risk Management**
   a. Formulating strategies to encourage the creation of the Bank's compliance culture.
   b. Proposing compliance policies or compliance principles to be specified by the Board of Directors.
   c. Establishing compliance systems and procedures to develop the Bank's internal provisions and guidelines.
   d. Ensuring that all policies, provisions, systems, and procedures and business activities conducted by the Bank are in accordance with the provisions of Financial Services Authority, and the laws and regulations.
   e. Minimizing the Bank's compliance risk.
   f. Taking precautions so that the policies and/or decisions taken by the Bank's Board of Directors do not deviate from the provisions of the Financial Services Authority and the provisions of laws and regulations.
   g. Performing other tasks associated with the compliance function.

   Related to the implementation of governance, the Director of Compliance and Risk Management who are appointed as the Director in Charge can formulate strategic steps to support and improve the effectiveness of compliance function implementation, risk management implementation, and governance implementation. Reporting of the implementation of duties and responsibilities of the compliance function to the regulator is conducted by the Director of Compliance and Risk Management, with copies to the Board of Commissioners at least on a quarterly basis.

3. **Divisi *Compliance, System Procedure & Coordinator Customer Protection***
   a. Membuat langkah untuk mendukung terciptanya budaya kepatuhan pada seluruh kegiatan usaha Bank pada setiap jenjang organisasi.
   b. Melakukan identifikasi, pengukuran, pemantauan, dan pengendalian terhadap risiko kepatuhan dengan mengacu pada ketentuan Otoritas Jasa Keuangan.
   c. Menilai dan mengevaluasi efektivitas, kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan peraturan perundang-undangan.
   d. Melakukan kaji ulang dan/atau merekomendasikan untuk menginikan dan menyempurnakan kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank agar sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
   e. Melakukan upaya untuk memastikan bahwa kebijakan, ketentuan, sistem dan prosedur, serta kegiatan usaha Bank telah sesuai dengan ketentuan Otoritas Jasa Keuangan dan ketentuan peraturan perundang-undangan.
   f. Melakukan tugas lain yang terkait dengan fungsi kepatuhan.

   Divisi *Compliance, System Procedure & Coordinator Customer Protection* melaporkan seluruh aktivitasnya dalam melaksanakan tugas dan tanggung jawabnya langsung kepada Direktur Kepatuhan dan Manajemen Risiko.

3. **Compliance, System Procedure & Coordinator Customer Protection Division**
   a. Preparing steps in order to support the creation of a compliance culture on all of the Bank's business activities at every organizational level.
   b. Identifying, measuring, monitoring, and controlling the compliance risks by referring to the provisions of the Financial Services Authority.
   c. Assessing and evaluating the effectiveness, adequacy, and conformity of the Bank's policies, regulations, systems, and procedures against the provisions of laws and regulations.
   d. Reviewing and/or recommending updates and refinements of policies, provisions, systems, and procedures owned bythe Bank to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations.
   e. Taking measures to ensure that the policies, regulations, systems, and procedures, as well as the Bank's business activities to be in accordance with the provisions of the Financial Services Authority and provisions of laws and regulations.
   f. Performing other tasks associated with the compliance function.

   The Compliance, System Procedure & Coordinator Customer Protection Division reports all of its activities in performing its duties and responsibilities directly the Director of Compliance and Risk Management.

Profil Kepala Divisi Compliance, System Procedure & Coordinator Customer Protection
Profile of the Head of Compliance, System Procedure & Coordinator Customer Protection Division

R.R. UTAMI TJIPTO

Kepala Divisi *Compliance, System Procedure & Coordinator Customer Protection*

Head of Compliance, System Procedure & Coordinator Customer Protection Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Jakarta

Usia / Age
63 tahun / 63 years old

Domisili / Domicile
Jakarta

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 001/SK-DIR/HCM/06/23 tanggal 5 Juni 2023.

Riwayat Pendidikan
Sarjana Hukum dari Universitas Airlangga (1986).

Rangkap Jabatan
Di dalam Bank Victoria:
Tidak ada.

Di luar Bank Victoria:
Tidak ada.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 001/SK-DIR/HCM/06/23 dated 5 June 2023.

Education
Bachelor of Laws from Airlangga University (1986).

Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

Riwayat Jabatan
- *Recovery Litigation Group Head* dan berbagai posisi di PT Bank CIMB Niaga Tbk (2009-2010).
- *Compliance & Legal Group Head* PT Bank ICB Bumiputera Tbk (2010-2012).
- *Head of Compliance & Procedure* PT Bank QNB Indonesia Tbk (2012-2017).
- *Core Team* PT Asuransi Candi Utama establishment (2018-2019).
- *Head of Legal Compliance AML & Corporate Secretary* PT Asuransi Candi Utama (2020-2023).
- Kepala Divisi *Compliance & System and Procedure* Bank Victoria (2023).

Sertifikasi
- Sertifikasi *Compliance Manager* (CPM) dari Ikatan Bankir Indonesia (2016).
- Sertifikasi Asesor dari Sertifikasi Profesi Perbankan (2017).
- Sertifikasi Manajemen Risiko Level 4 dari Lembaga Sertifikasi Profesi Perbankan (2019).
- Sertifikasi Manajemen Risiko - *Qualified Chief Risk Officer* dari Lembaga Sertifikasi Profesi – Mitra Kalyana Sejahtera (2022).
- Sertifikasi Manajemen Risiko Jenjang 6 dari Lembaga Sertifikasi Profesi Perbankan (2024).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

History of Previous
- Recovery Litigation Group Head and various positions at PT Bank CIMB Niaga Tbk (2009-2010).
- Compliance & Legal Group Head of PT Bank ICB Bumiputera Tbk (2010-2012).
- Head of Compliance & Procedure PT Bank QNB Indonesia Tbk (2012-2017).
- Core Team of PT Asuransi Candi Utama establishment (2018-2019).
- Head of Legal Compliance AML & Corporate Secretary PT Asuransi Candi Utama (2020-2023).
- Head of Compliance & System and Procedure Division of Bank Victoria (2023).

Certification
- Compliance Manager Certification (CPM) from the Indonesian Bankers Association (2016).
- Assessor Certification from Certification of Banking Profession (2017).
- Risk Management Certification Level 4 from Banking Profession Certification Institute (2019).
- Risk Management Certification - Qualified Chief Risk Officer from Professional Certification Institute – Mitra Kalyana Sejahtera (2022).
- Certification of Risk Management Level 6 from Banking Profession Certification Institution (2024).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Laporan Singkat Pelaksanaan Kegiatan Fungsi Kepatuhan Tahun 2025

Selama tahun 2025, Fungsi Kepatuhan telah menjalankan berbagai aktivitas sebagai wujud pelaksanaan tugas dan tanggung jawabnya, dengan rincian sebagai berikut:

1. Menyusun dan memperbarui kebijakan serta prosedur sesuai dengan regulasi yang berlaku.
2. Memantau dan menindaklanjuti hasil pemeriksaan Otoritas Jasa Keuangan sesuai *target date* yang ditetapkan.
3. Bertindak sebagai *liaison* Bank dengan Otoritas Jasa Keuangan.
4. Melakukan kajian regulasi terhadap proposal kredit di atas nilai tertentu.
5. Menelaah aspek kepatuhan terhadap regulasi atas produk dan/atau aktivitas baru.
6. Melakukan kajian produk dan/atau aktivitas baru serta membuat *compliance checklist* produk dan/atau aktivitas baru.
7. Menyosialisasikan peraturan terbaru dari Otoritas Jasa Keuangan, Bank Indonesia, dan regulator lainnya, serta kebijakan dan standar operasional prosedur Bank, baik secara *online* maupun *offline*.
8. Menyelenggarakan *Focus Group Discussion* (FGD) atas Peraturan Otoritas Jasa Keuangan dan/atau Bank Indonesia.
9. Menunjuk *Compliance Champion* di setiap divisi dan cabang untuk meningkatkan budaya kepatuhan di seluruh lini Bank.

Brief Report on Implementation of Compliance Function's Activities in 2025

Throughout 2025, the Compliance Function carried out various activities as the manifestation of its duty and responsibility implementation with the following details:

1. Preparing and updating policies and procedures in accordance with applicable regulations.
2. Monitoring and following up on the results of the Financial Services Authority's audit according to the target date set.
3. Acting as the Bank liaison with the Financial Services Authority.
4. Conducting regulatory reviews of credit proposals above a certain threshold.
5. Reviewing aspects of regulatory compliance for new products and/or activities.
6. Reviewing new products and/or activities and creating compliance checklists for new products and/or activities.
7. Disseminating the latest regulations from Financial Services Authority, Bank Indonesia, and other regulators, as well as the Bank's policies and standard operating procedures, both online and offline.
8. Organizing Focus Group Discussions (FGD) on Financial Services Authority and/or Bank Indonesia Regulations.
9. Appointing Compliance Champions in each division and branch to enhance compliance culture across all lines of the Bank.

10. Mengadakan pelatihan tentang Peraturan Otoritas Jasa Keuangan terkait pelindungan konsumen bagi fungsi kerja pelindungan konsumen, Kepala Cabang, dan Kepala Operasional Cabang.
11. Mengirimkan pengingat kepada unit kerja terkait kewajiban pelaporan bulanan, triwulan, semester, dan tahunan.
12. Mengisi topik terkait GCG dan regulasi dalam rapat budaya yang diselenggarakan secara berkala.
13. Mengikuti pelatihan baik secara *online* maupun *offline* guna meningkatkan kompetensi di bidang kepatuhan.

Selain itu, Direktur Kepatuhan dan Manajemen Risiko juga telah menjalankan berbagai aktivitas sebagai wujud pelaksanaan tugas dan tanggung jawabnya dalam fungsi kepatuhan, dengan rincian sebagai berikut:

1. Menjalankan pedoman dan tata tertib terkait pengorganisasian Bank, pengaturan kewenangan dan prosedur keputusan.
2. Menjalankan rapat-rapat Direksi dibuktikan dengan notulen rapat.
3. Pelaksanaan kewenangan Direktur Kepatuhan dan Manajemen Risiko dalam mengelola Bank, dilakukan sesuai kewenangan yang diberikan dalam Anggaran Dasar, hasil RUPS, *BoD Charter*, dan regulasi yang berlaku.
4. Dalam pelaksanaan tugas dan tanggung jawabnya, Direktur Kepatuhan dan Manajemen Risiko senantiasa menerapkan prinsip-prinsip tata kelola pada seluruh tingkatan atau jenjang organisasi sebagaimana ketentuan yang berlaku dan secara berkesinambungan meningkatkan kinerja Bank.
5. Direktur Kepatuhan dan Manajemen Risiko tidak terdapat sanksi adminitratif dari regulator.

Pelatihan dan/atau Peningkatan Fungsi Kepatuhan

Pada tahun 2025, Fungsi Kepatuhan berpartisipasi dalam sejumlah program pelatihan dan pengembangan kompetensi, baik internal maupun eksternal, sebanyak 53 kali (lima puluh tiga) kali, dengan materi yang mencakup perlindungan data pribadi awareness, meningkatkan integritas Laporan Keuangan dan kepercayaan publik, layanan pengaduan, penguatan fungsi *Governance, Risk, and Compliance* (GRC) di sektor jasa keuangan, kebijakan insentif likuiditas makroprudensial, dan ketentuan mengenai giro wajib minimum.

10. Conducting training on Financial Services Authority Regulations related to consumer protection for consumer protection work functions, Branch Managers, and Branch Operations Managers.
11. Sending reminders to work units regarding monthly, quarterly, semi-annual, and annual reporting obligations.
12. Addressing topics related to GCG in cultural meetings held periodically.
13. Participating in training sessions, both online and offline, to improve competency in compliance.

Furthermore, the Director of Compliance and Risk Management has also carried out various activities to demonstrate the implementation of his duties and responsibilities in the compliance function, as detailed below:

1. Carrying out charter related to the Bank's organization, authority arrangements, and decision-making procedures.
2. Carrying out Board of Directors' meetings, evidenced by meeting minutes.
3. Implementing the authorities of Director of Compliance and Risk Management in managing the Bank in accordance with the authority granted in Articles of Association, results of the GMS, Board of Directors' Charter, and applicable regulations.
4. In implementing duties and responsibilities, the Director of Compliance and Risk Management consistently applies governance principles at all levels of the organization, in accordance with applicable regulations, and continuously improves the Bank's performance.
5. The Director of Compliance and Risk Management receive no administrative sanctions from regulators.

Compliance Function's Training and/or Development Programs

In 2025, the Compliance Function participated in a number of training and competency development programs, both internal and external, totaling 53 (fifty-three) times, with topics covering personal data protection awareness, enhancing the integrity of Financial Statements and public trust, complaints services, strengthening the Governance, Risk, and Compliance (GRC) function in financial services sector, macroprudential liquidity incentive policies, and regulations regarding minimum reserve requirements.

Tingkat Kepatuhan Bank

Bank secara konsisten menjaga tingkat kepatuhan yang tinggi terhadap seluruh ketentuan dan peraturan perundang-undangan yang berlaku, termasuk peraturan Otoritas Jasa Keuangan, Bank Indonesia, serta ketentuan otoritas lain yang relevan. Pelaksanaan fungsi kepatuhan dilakukan secara terstruktur dan independen melalui pemantauan kepatuhan atas kebijakan internal, aktivitas usaha, dan pelaksanaan komitmen Bank kepada otoritas yang berwenang. Sepanjang tahun pelaporan, Bank melakukan pemantauan, evaluasi, dan tindak lanjut atas pemenuhan ketentuan serta komitmen regulator secara berkelanjutan guna memastikan kegiatan usaha Bank berjalan sesuai prinsip kehati-hatian, tata kelola yang baik, dan ketentuan yang berlaku.

Pada tahun 2025, Bank telah melaporkan seluruh kewajiban pelaporan, termasuk tindak lanjut hasil pemeriksaan Otoritas Jasa Keuangan. Jumlah komitmen yang harus dilaporkan kepada Otoritas Jasa Keuangan sebanyak 496 komitmen dan telah selesai dilaporkan sesuai *target date*.

Bank Compliance Level

The Bank consistently maintains a high level of compliance with all applicable laws and regulations, including those of the Financial Services Authority, Bank Indonesia, and other relevant authorities. The compliance function is implemented in a structured and independent manner through monitoring compliance with internal policies, business activities, and the Bank's commitments to the relevant authorities. Throughout the reporting year, the Bank continuously monitored, evaluated, and followed up on compliance with regulatory requirements and commitments to ensure that the Bank's business activities were conducted in accordance with prudent principles, good governance, and applicable regulations.

In 2025, the Bank reported all reporting obligations, including follow-up actions on audit results from the Financial Services Authority. A total of 496 commitments were required to be reported to the Financial Services Authority, and these were completed by the target date.

Pengadaan Barang dan Jasa [POJK F.1]

Procurement of Goods and Services

Bank Victoria memiliki kebijakan pengadaan barang dan jasa sebagai pedoman bagi seluruh unit kerja dalam mendukung kelancaran operasional dan layanan kepada nasabah. Dalam pelaksanaannya, Bank dapat mengalihdayakan fungsi penunjang kepada pihak ketiga, dengan tetap menjunjung prinsip transparansi, objektivitas, perlakuan yang adil terhadap seluruh rekanan, serta pencegahan terhadap praktik yang tidak etis.

Bank Victoria has a goods and services procurement policy that serves as a guideline for all work units to support smooth operations and customer service. In its implementation, the Bank may outsource supporting functions to third parties, while upholding the principles of transparency, objectivity, fair treatment of all partners, and prevention of unethical practices.

Etika Pengadaan Barang dan Jasa

Pelaksanaan pengadaan barang dan jasa di Bank mengacu pada Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Pedoman ini menjadi landasan dalam menjaga integritas hubungan antara karyawan dan rekanan maupun calon rekanan, dengan berpegang pada prinsip-prinsip berikut:

Ethics of Procurement of Goods and Services

The implementation of goods and services procurement at the Bank refers to Board of Directors' Decision No. 024A/SK-DIR/02/23 dated 24 February 2023 on Employee's Code of Conduct of PT Bank Victoria International Tbk. These guidelines serve as the basis for maintaining the integrity of relationships between employees and partners, as well as potential partners, by adhering to the following principles:

1. Tidak menerima tips atau mencari pengadaan berdasarkan keuntungan pribadi semata.
2. Transparansi.
3. Mencari penawaran terbaik.
4. Tidak terdapat *conflict of interest*.
5. Vendor harus mengikuti peraturan terkait pengadaan barang dan jasa yang berlaku di Bank Victoria.

1. Do not accept tips or seek procurement based on personal interest.
2. Transparency.
3. Look for the best deals.
4. No conflict of interest.
5. Vendors must follow the regulations regarding the procurement of goods and services applicable at Bank Victoria.

Pengadaan Barang dan Jasa Tahun 2025

Pada tahun 2025, realisasi pengadaan barang dan jasa Bank tercatat sebesar Rp76.910.546.203,- dengan jumlah kegiatan pengadaan sebanyak 13 (tiga belas) kegiatan.

Procurement of Goods and Services in 2025

In 2025, the Bank's procurement of goods and services was recorded at Rp76,910,546,203.- with a total of 13 (thirteen) procurement activities.

Perkara Hukum
Legal Cases

Sepanjang tahun 2025, perkara hukum yang dihadapi Bank sebagai berikut:

Throughout 2025, the legal cases faced by the Bank were as follows:

Perkara Hukum Legal Cases	Perdata Civil	Pidana Criminal	Tata Usaha Negara State Administration
Bank Victoria			
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	2	-	1
Dalam Proses Penyelesaian In Settlement Process	14	-	-
Dewan Komisaris dan Direksi Bank Victoria Board of Commissioners and Board of Directors of Bank Victoria			
Telah Selesai (Mempunyai Kekuatan Hukum yang Tetap) Settled (Final and Binding)	-	-	-
Dalam Proses Penyelesaian In Settlement Process	-	-	-
Total	**16**	**-**	**1**

Perkara Hukum yang Dihadapi Bank Victoria Tahun 2025
Legal Cases Faced by Bank Victoria in 2025

Perkara No. 107/Pdt.G/2024/PN Jkt.Sel Case		Perkara No. 107/Pdt.G/2024/PN Jkt.Sel Case	
Para Pihak Parties	**Penggugat:** Plaintiff: PT Iswara Dewata. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Kota Denpasar. • State Assets and Auction Service Office of Denpasar City.	**Para Pihak** Parties	**Penggugat:** Plaintiff: PT Iswara Dewata. **Tergugat:** Defendants: PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	Immateriil / Immaterial: Rp1.000.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp219.483.844.757,- dan / and: USD11.600.000.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.	**Status Penyelesaian Perkara** Case Settlement Status	Immateriil / Immaterial: USD201.448.631,91 dan / and Rp8.000.000.000.000,-.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Dalam pemeriksaan perkara di Pengadilan Negeri Jakarta Selatan. On case examination at South Jakarta District Court.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 334/Pdt.G/2025/PN Dps Case		Perkara No. 1188/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: PT Tunas Jaya Sanur. **Tergugat:** Defendants: • Kantor Pelayanan Kekayaan Negara dan Lelang Kota Denpasar. • State Assets and Auction Service Office of Denpasar City. • PT Bank Victoria International Tbk. • PT Iswara Dewata.	**Para Pihak** Parties	**Penggugat:** Plaintiff: PT Inet Global Indo. **Tergugat:** Defendants: PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perlawanan. Counter claim.	**Pokok Perkara** Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	Material: Rp14.327.446.456,17.	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp 93.462.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Pengadilan Negeri Denpasar. On case examination at Denpasar District Court.	**Status Penyelesaian Perkara** Case Settlement Status	Immateriil / Immaterial: Rp2.000.000.000,-.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Dalam pemeriksaan perkara di Pengadilan Tinggi Jakarta. On case examination at Jakarta High Court.

Perkara No. 334/Pdt.G/2025/PN Dps Case		Perkara No. 1188/Pdt.G/2024/PN Jkt.Pst Case	
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Sukoco Halim. **Tergugat:** Defendants: • PT Inet Global Indo. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III. • State Assets and Auction Service Office of of Jakarta III.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Sucik Mardi. **Tergugat:** Defendants: PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perlawanan. Counter claim.	**Pokok Perkara** Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	-	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp100.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Pengadilan Negeri Jakarta Selatan. On case examination at outh Jakarta District Court.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Sigit Hartono. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • PT Bank Victoria International Tbk (KCP Muara Karang).	**Para Pihak** Parties	**Penggugat:** Plaintiff: Firzia Resita. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Tangerang II. • State Assets and Auction Service Office of Tangerang II. • PT Matador Lelang Sukses.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan perlawanan. Counter claim.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp 5.896.728.000,-. • Immateriil / Immaterial: Rp 470.000.000,-	**Nilai Nominal Gugatan** Nominal Value of Claim	Material dan Immateriil / and Immate-rial: Rp2.400.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.

Perkara No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 727/Pdt.G/2025/PN.Jkt.Pst Case		Perkara No. 525/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Sufendi **Tergugat:** Defendants: PT Bank Victoria International Tbk.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Ismail Chamdani, dan kawan-kawan. Ismail Chamdani, and fellows **Tergugat:** Defendants: • Badan Pertanahan Nasional Jakarta Selatan. • South Jakarta National Land Agency. • PT Papan Utama Indonesia. • PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan pertanahan. Land dispute lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp2.645.142.036,42. • Immateriil / Immaterial: Rp3.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	-
Status Penyelesaian Perkara Case Settlement Status	Pemohon kasasi mencabut permohonan kasasi karena sudah ada upaya damai. The cassation petitioner withdrew the cassation petition due to the existence of amicable efforts.	**Status Penyelesaian Perkara** Case Settlement Status	Majelis Hakim pada Mahkamah Agung Republik Indonesia telah memutus perkara ini. The Panel of Judges at the Supreme Court of the Republic of Indonesia has ruled on this case.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 395/Pdt.G/2025/PN Jkt.Pst Case		Perkara No. 202/Pdt.Bth/2024/PN Jkt.Brt Case	
Para Pihak Parties	**Penggugat:** Plaintiff: • YPKKP Bandung. • Riska Nurasyiah. • Rinalwan Buchari, MBA. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • PT Corex Intek Indonesia.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Ir Bara Frontasia dan kawan-kawan. Ir Bara Frontasia and fellows. **Tergugat:** Defendants: • PT Karya Technik Multifinance. • PT Wellman Denyo. • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta V. • State Assets and Auction Service Office of Jakarta V.

Perkara No. 395/Pdt.G/2025/PN Jkt.Pst Case		Perkara No. 202/Pdt.Bth/2024/PN Jkt.Brt Case	
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.	**Pokok Perkara** Case Profile	Gugatan perlawanan. Counter claim.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp6.077.079.809,50. • Immateriil / Immaterial: Rp1.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	-
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Pengadilan Negeri Jakarta Pusat. On case examination at Central Jakarta District Court.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 1074/Pdt.Bth/2024/PN Dps Case		Perkara No. 954/Pdt.G/2023/PN Dps Case	
Para Pihak Parties	**Penggugat:** Plaintiff: • Lim Wan Seng. • Dr Anner Mangatur Sianipar, SH, MH, CTA. **Tergugat:** Defendants: • Firman Handoko. • Metha Meilina. • PT Tata Pesona Indonesia. • PT Bank Victoria International Tbk. • Johanes Chorman/Johanes/Aping Johanes Chorman. • PT Central Indonesia. • Suwarni Sukiman, SH.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Johanes Chorman/Johanes/Aping Johanes Chorman. **Tergugat:** Defendants: • Firman Handoko. • PT Tata Pesona Indonesia. **Turut Tergugat:** Co-Defendant: PT Bank Victoria International Tbk.
Pokok Perkara Case Profile	Gugatan perlawanan pihak ketiga. Third party counter claim.	**Pokok Perkara** Case Profile	Gugatan wanprestasi. Default lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	Material: Rp30.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp25.400.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 703/Pdt.G/2024/PN Jkt.Tim Case		Perkara No. 606/Pdt.G/2024/PN Jkt.Pst Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Ir Zulmarlyan. **Tergugat:** Defendants: • Alin Taslim. • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III. • State Assets and Auction Service Office of of Jakarta III.	**Para Pihak** Parties	**Penggugat:** Plaintiff: Liu Ket Men. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • Kantor Pelayanan Kekayaan Negara dan Lelang Jakarta III. • State Assets and Auction Service Office of of Jakarta III.
Pokok Perkara Case Profile	Gugatan perlawanan pihak ketiga. Third party counter claim.	**Pokok Perkara** Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	• Material : Rp1.400.000.000,-. • Immateriil / Immaterial: Rp1.000.000.000,-.	**Nilai Nominal Gugatan** Nominal Value of Claim	Material: Rp5.000.000.000,-.
Status Penyelesaian Perkara Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Pengadilan Tinggi Jakarta. On case examination at Jakarta High Court.	**Status Penyelesaian Perkara** Case Settlement Status	Dalam pemeriksaan perkara di Mahkamah Agung Republik Indonesia. On case examination at the Supreme Court of the Republic of Indonesia.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.	**Risiko dan Pengaruh yang Dihadapi Bank** Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.	**Sanksi Administrasi** Administrative Sanctions	Belum ada. None yet.

Perkara No. 1164/Pdt.G/2023/PN Sby Case	
Para Pihak Parties	**Penggugat:** Plaintiff: Susanto. **Tergugat:** Defendants: • PT Bank Victoria International Tbk. • PT Properindo Gemilang Makmur.
Pokok Perkara Case Profile	Gugatan perbuatan melawan hukum. Wrongful acts lawsuit.
Nilai Nominal Gugatan Nominal Value of Claim	-
Status Penyelesaian Perkara Case Settlement Status	Majelis Hakim pada Mahkamah Agung Republik Indonesia telah memutus perkara ini The Panel of Judges at the Supreme Court of the Republic of Indonesia has ruled on this case.
Risiko dan Pengaruh yang Dihadapi Bank Risks Faced by and Impact on the Bank	Belum ada. None yet.
Sanksi Administrasi Administrative Sanctions	Belum ada. None yet.

Sanksi Administratif
Administrative Sanctions

Pada tahun 2025, anggota Dewan Komisaris dan anggota Direksi tidak menerima sanksi administrasi, baik dari regulator, perpajakan, maupun perbankan. Sementara itu, Bank Victoria menerima sanksi finansial sebesar Rp385.700.000,- dari Bank Indonesia dan Otoritas Jasa Keuangan.

In 2025, members of Board of Commissioners and members of Board of Directors did not receive any administrative sanctions from regulators, tax authorities, or banks. Meanwhile, Bank Victoria received a financial sanction of Rp385,700,000 from Bank Indonesia and Financial Services Authority.

Program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal [POJK F.1]
Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction Program

Penerapan program Anti-Pencucian Uang, Pencegahan Pendanaan Terorisme, dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal (APU, PPT, dan PPPSPM) merupakan kewajiban yang melekat pada seluruh penyedia jasa keuangan, termasuk Bank. Kewajiban ini menjadi semakin penting seiring dengan berkembangnya modus kejahatan yang memanfaatkan layanan perbankan untuk tindak pidana pencucian uang, pendanaan terorisme, maupun proliferasi senjata pemusnah massal. Bank telah melaksanakan program APU, PPT, dan PPPSPM dengan pendekatan berbasis risiko, disertai kewajiban pelaporan kepada Pusat Pelaporan dan Analisis Transaksi Keuangan (PPATK) sebagai *Financial Intelligence Unit* (FIU). Adapun langkah-langkah yang ditempuh Bank dalam penerapan program tersebut sebagai berikut:

1. Pengawasan Aktif Direksi dan Dewan Komisaris terhadap Program APU, PPT, dan PPPSPM Direksi Bank memastikan efektivitas penerapan Prinsip APU, PPT, dan PPPSPM melalui:

    a. Mengusulkan kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPPSPM kepada Dewan Komisaris.

The implementation of Anti-Money Laundering, Counter-Terrorist Financing, and Counter-Proliferation Financing of Weapons of Mass Destruction (AML, CTF, and CPF) programs is an inherent obligation of all financial service providers, including the Bank. This obligation has become increasingly important in line with the growing number of criminal methods that exploit banking services for money laundering, terrorist financing, and proliferation of weapons of mass destruction. The Bank has carried out AML, CFT, and CPF programs by using risk-based approach, along with mandatory reporting to the Financial Transaction Reports and Analysis Center (PPATK) as the Financial Intelligence Unit (FIU). The measures taken by the Bank in implementing such programs are as follows:

1. Active Supervision by the Board of Directors and the Board of Commissioners of the AML, CTF, and CPF programs. The Bank's Board of Directors ensures the effective implementation of the AML, CTF, and CPF principles through the following measures:
    a. Proposing written policies and procedures for the implementation of the AML, CTF, and CPF programs to the Board of Commissioners.

b. Memastikan penerapan program APU, PPT, dan PPPSPM dilaksanakan sesuai dengan kebijakan dan prosedur tertulis yang telah ditetapkan.
c. Membentuk unit kerja khusus dan/atau menunjuk pejabat yang bertanggung jawab terhadap penerapan program APU, PPT, dan PPPSPM.
d. Melakukan pengawasan atas kepatuhan unit kerja dalam menerapkan program APU, PPT, dan PPPSPM.
e. Memastikan bahwa kebijakan dan prosedur tertulis mengenai penerapan program APU, PPT, dan PPPSPM sejalan dengan perubahan dan pengembangan produk, jasa, dan teknologi di sektor jasa keuangan serta sesuai dengan perkembangan modus TPPU, TPPT, dan/atau PPSPM.
f. Memastikan pejabat dan/atau pegawai, khususnya pegawai dari satuan kerja terkait dan pegawai baru, telah mengikuti pelatihan yang berkaitan dengan penerapan program APU, PPT, dan PPPSPM sebanyak 1 (satu) kali dalam 1 (satu) tahun.
g. Memastikan adanya pembahasan terkait penerapan program APU, PPT, dan PPPSPM dalam rapat Direksi.

Dewan Komisaris bertanggung jawab untuk:
a. Memastikan Bank memiliki kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM.
b. Memberikan persetujuan atas kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM yang diusulkan oleh Direksi.
c. Melakukan evaluasi atas kebijakan dan prosedur Penerapan Program APU, PPT, dan PPPSPM.
d. Melakukan pengawasan atas pelaksanaan tanggung jawab Direksi terhadap penerapan program APU, PPT, dan PPPSPM.
e. Memastikan adanya pembahasan terkait penerapan program APU, PPT, dan PPPSPM dalam rapat Direksi dan Dewan Komisaris.

2. Kebijakan dan prosedur penerapan program APU, PPT, dan PPPSPM
Bank telah memiliki kebijakan dan prosedur yang sejalan dan sesuai dengan peraturan perundang-undangan dan *best practices,* antara lain mencakup:
a. Uji tuntas nasabah/*Customer Due Diligence* (CDD) dan/atau uji lanjut nasabah/*Enhance Due Diligence* (EDD) terhadap calon nasabah, nasabah, *conductor* dan *Walk in Customer* (WIC), *Beneficial Owner* (BO), dan *Politically Exposed Person* (PEP).
b. Penghentian sementara transaksi dan penundaan transaksi.
c. Penolakan transaksi dan penutupan hubungan usaha.
d. Pengelolaan risiko pencucian uang dan/atau pendanaan terorisme berdasarkan pendekatan berbasis risiko (*risk-based approach*) terkait nasabah,

b. Ensuring that the implementation of the AML, CTF, and CPF programs is carried out in accordance with the established written policies and procedures.
c. Establishing a specialized work unit and/or appointing officials in charge of the implementation of the AML, CTF, and CPF programs.
d. Supervising the compliance of work units in implementing the AML, CTF, and CPF programs.
e. Ensuring that the written policies and procedures for the implementation of the AML, CTF, and CPF programs align with changes and developments in products, services, and technology in the financial services sector, as well as with the evolving modes of TPPU, TPPT, and/or PPSPM.
f. Ensuring that officials and/or employees, especially those from relevant work units and new employees, have attended training related to the implementation of the AML, CTF, and CPF programs at least once a year.
g. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors' meetings.

The Board of Commissioners is responsible for:
a. Ensuring that the Bank has policies and procedures for implementing AML, CTF, and CPF programs.
b. Approving the policies and procedures for implementing the AML, CTF, and CPF programs proposed by the Board of Directors.
c. Evaluating the policies and procedures for implementing the AML, CTF, and CPF programs.
d. Supervising the execution of the Board of Directors' responsibilities regarding the implementation of the AML, CTF, and CPF programs.
e. Ensuring that discussions related to the implementation of the AML, CTF, and CPF programs are included in the Board of Directors and Board of Commissioners meetings.

2. Policies and procedures for the implementation of AML, CTF, and CPF programs
The Bank has established policies and procedures that align with laws and regulations and best practices, which include:
a. Customer Due Diligence (CDD) and/or Enhanced Due Diligence (EDD) for prospective customers, customers, conductors and Walk-in Customers (WIC), Beneficial Owner (BO), and Politically Exposed Persons (PEP).
b. Temporary Suspension and delay of transactions.
c. Rejection of transactions and termination of business relationships.
d. Management of money laundering and/or terrorist financing risks based on a risk-based approach concerning customers, geographical areas/countries,

negara/area geografis, produk, jasa dan transaksi, serta jaringan distribusi (*delivery channels*).
e. Pemantauan dan penginian.
f. *Cross border correspondent banking*.
g. Transfer dana.
h. Penatausahaan dokumen.
i. Pelaporan dan sanksi.

3. Pengendalian internal yang efektif dalam penerapan APU, PPT, dan PPPSPM, antara lain dilakukan dengan:
   a. Memiliki kebijakan dan prosedur APU, PPT, dan PPPSPM serta pemantauan internal yang tepat.
   b. Adanya batasan wewenang dan tanggung jawab yang jelas terhadap satuan kerja terkait dengan penerapan program APU, PPT, dan PPPSPM, baik melalui *first line of defense*, *second line of defense,* maupun *third line of defense*.
   c. Melakukan pemeriksaan untuk memastikan efektivitas pelaksanaan program APU, PPT, dan PPPSPM oleh SKAI.
4. Sistem informasi manajemen
   Untuk mengoptimalkan pemantauan transaksi dalam pelaksanaan program APU, PPT, dan PPPSPM, Bank secara berkelanjutan mengembangkan teknologi sistem informasi, antara lain:
   a. Melakukan penyempurnaan sistem dan aplikasi pendukung untuk Laporan Transaksi Keuangan Tunai, Laporan Transfer Dana dari dan ke Luar Negeri, Laporan Transaksi Keuangan Mencurigakan, *Filtering and Screening Terrorist (DTTOT List), PEP Screening Detection dan Customer Due Diligence (CDD) Risk Scoring* dalam suatu sistem yaitu SmartAML. SmartAML digunakan untuk mendukung pelaksanaan *know your customer* yang lebih optimal, khususnya dalam pendeteksian/pemantauan transaksi nasabah yang memiliki pola perilaku dan pola transaksi pencucian uang dan pendanaan terorisme, serta pendanaan proliferasi senjata pemusnah massal.
   b. Mengembangkan aplikasi Sistem Terduga Pendanaan Terorisme (SIPENDAR) PPATK.
   c. Mengembangkan aplikasi Sistem Informasi Pengguna Jasa Terpadu (SIPESAT) PPATK.
5. HC dan pelatihan
   Bank menyelenggarakan program pelatihan yang berkesinambungan dan berkala paling sedikit 1 (satu) kali dalam 1 (satu) tahun untuk memastikan HC memiliki pengetahuan yang memadai, terutama terkait APU, PPT, dan PPPSPM. Pelatihan mencakup penerapan peraturan perundang-undangan terkait, tipologi pencucian uang dan pendanaan terorisme, serta kebijakan dan prosedur internal program APU, PPT, dan PPPSPM beserta peran serta tanggung jawab karyawan dalam pencegahan pencucian uang, pendanaan terorisme, dan pendanaan proliferasi senjata pemusnah massal.

products, services and transactions, as well as delivery channels.
e. Monitoring and updating.
f. Cross-border correspondent banking.
g. Fund transfers.
h. Document administration.
i. Reporting and sanctions.

3. Effective internal control in the implementation of AML, CTF, and CPF programs is achieved through the following measures:
   a. Establishing appropriate AML, CTF, and CPF policies and procedures, as well as proper internal monitoring.
   b. Establishing clear limitations of authority and responsibility for the work units involved in the implementation of the AML, CTF, and CPF programs, whether through the first line of defense, second line of defense, or third line of defense.
   c. Conducting audits to ensure the effective implementation of the AML, CTF, and CPF programs. The audits are conducted by SKAI.
4. Management information system
   To optimize transaction monitoring in the implementation of AML, CTF, and CPF programs, the Bank is continuously developing its information system technology by, among others:
   a. Refining the system and supporting applications for Cash Financial Transaction Reports, International Fund Transfer Reports, Suspicious Financial Transaction Reports, Filtering and Screening Terrorist (DTTOT List), PEP Screening Detection, and Customer Due Diligence (CDD) Risk Scoring within a system called SmartAML. SmartAML is used to support the optimal implementation of the "know your customer" process, particularly in detecting/monitoring customer transactions that exhibit patterns of money laundering, terrorist financing, and proliferation of weapons of mass destruction financing behavior.
   b. Developing PPATK's Suspected Terrorism Financing Information System (SIPENDAR) application.
   c. Developing PPATK's Integrated Service User Information System (SIPESAT) application.
5. HC and training
   The Bank organizes regular and continuous training programs at least once a year to ensure that its HC are adequately knowledgeable, especially in relation to AML, CTF, and CPF. The training covers the application of relevant laws and regulations, typologies of money laundering and terrorist financing, as well as internal policies and procedures of the AML, CTF, and CPF programs, along with the roles and responsibilities of employees in preventing money laundering, terrorist financing, and financing the proliferation of weapons of mass destruction.

Sepanjang tahun 2025, Bank semakin memperkuat implementasi program APU, PPT, dan PPPSPM melalui peningkatan kompetensi SDM, optimalisasi sistem SmartAML, serta pengembangan teknologi yang adaptif terhadap pertumbuhan transaksi digital, sehingga mendukung pengelolaan risiko TPPU, TPPT, dan TPPPSPM secara lebih efektif serta mengantarkan Bank meraih predikat "Sangat Baik" selama 4 (empat) tahun berturut-turut dalam penilaian Financial Integrity Rating (FIR) on ML/TF oleh PPATK.

Financial Integrity Rating on Money Laundering/Terrorism Financing

Financial Integrity Rating on Money Laundering and Terrorism Financing (FIR on ML/TF) merupakan penilaian terhadap integritas dan efektivitas pihak pelapor dalam menjalankan program APU dan PPT, khususnya dari aspek kinerja pelaporan APU, PPT, dan PPPSPM. Pengukuran nilai FIR on ML/TF dilakukan terhadap 3 (tiga) dimensi, yaitu:

1. Dimensi 1 (satu) untuk mengukur tingkat komitmen pihak pelapor dalam mendukung PPATK dan aparat penegak hukum dalam penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT.
2. Dimensi 2 (dua) untuk mengukur tingkat implementasi tata kelola pelaporan APU dan PPT yang dilakukan oleh pihak pelapor sesuai dengan ketentuan Lembaga Pengawas dan Pengatur (LPP) dan pedoman pelaporan dari PPATK.
3. Dimensi 3 (tiga) untuk mengukur tingkat kepatuhan pihak pelapor terhadap kewajiban pelaporan APU dan PPT kepada PPATK serta kualitas formal dan material atas keseluruhan laporan yang telah disampaikan sesuai dengan peraturan PPATK.

Hasil FIR on ML/TF menjadi tolok ukur bagi PPATK dan LPP dalam merumuskan langkah-langkah pembinaan, pengawasan, dan pengaturan berbasis risiko, khususnya untuk penguatan sistem APU dan PPT di setiap pihak pelapor dan penguatan integritas sistem keuangan secara nasional.

Nilai FIR on ML/TF yang diperoleh Bank Victoria pada tahun 2025 sebesar 9,33 yang dikontribusikan oleh dimensi 1 (satu) sebesar 9,81, dimensi 2 (dua) sebesar 10,00, dan dimensi 3 (tiga) sebesar 8,97. Hal ini menunjukkan bahwa tingkat komitmen Bank Victoria dalam mendukung PPATK dan aparat penegak hukum untuk melakukan penelusuran transaksi keuangan terkait indikasi TPPU dan TPPT, tingkat implementasi tata kelola pelaporan APU dan PPT sesuai ketentuan LPP dan pedoman pelaporan PPATK, tingkat kepatuhan terhadap kewajiban pelaporan APU dan PPT kepada PPATK, serta kualitas laporan yang disampaikan masuk pada kategori Sangat Baik.

Throughout 2025, the Bank further strengthened the implementation of AML, CTF, and CPF program by improving HC competencies, optimizing SmartAML system, and developing technology that adapted to the growth of digital transactions. This supported more effective management of TPPU, TPPT, and TPPPSPM risks and led to the Bank achieving a "Very Good" rating for 4 (four) consecutive years in Financial Integrity Rating (FIR) on ML/TF assessment by PPATK.

Financial Integrity Rating on Money Laundering/Terrorist Financing

The Financial Integrity Rating on Money Laundering and Terrorist Financing (FIR on ML/TF) is an assessment of the integrity and effectiveness of the reporting party in implementing AML and CTF programs, particularly from the aspect of AML, CTF, and CPF reporting performance. The FIR on ML/TF value is measured across 3 (three) dimensions:

1. Dimension 1 (one) measures the commitment level of the reporting party in supporting PPATK and law enforcement agencies in tracing financial transactions related to indications of TPPU and TPPT.
2. Dimension 2 (two) measures the level of implementation of AML and CTF reporting governance carried out by the reporting party in accordance with the provisions of the Supervisory and Regulatory Bodies (LPP) and PPATK reporting guidelines.
3. Dimension 3 (three) measures the compliance level of the reporting party with the obligation to report AML and CTF to PPATK and the formal and material quality of the overall reports submitted in accordance with PPATK regulations.

The FIR on ML/TF results serves as a benchmark for PPATK and LPP in formulating risk-based development, supervision, and regulation measures, especially for strengthening the AML and CTF systems in each reporting party and strengthening the integrity of the national financial system.

In 2025, Bank Victoria obtained FIR on ML/TF value of 9.33 contributed by dimension 1 (one) at 9.81 dimension 2 (two) at 10.00, and dimension 3 (three) at 8.97. This achievement indicates that Bank Victoria's commitment level in supporting PPATK and law enforcement agencies to trace financial transactions related to TPPU and TPPT indications, the level of implementation of AML and CTF reporting governance in accordance with LPP provisions and PPATK reporting guidelines, the compliance level with the obligation to report AML and CTF to PPATK, and the quality of the reports submitted are in the Very Good category.

Pemberian Dana Kegiatan Politik dan Tanggung Jawab Sosial [POJK F.1]

Provision of Funds for Political Activities and Social Responsibility

Bank berkomitmen menjaga independensi dan profesionalisme dalam menjalankan kegiatan usaha dengan tidak menyalurkan dana Bank untuk kegiatan politik, sebagaimana diatur dalam Kode Etik Bank. Meskipun demikian, Bank menghormati hak setiap karyawan untuk mengekspresikan aspirasi politik secara pribadi sepanjang dilakukan sesuai dengan ketentuan yang berlaku dan tidak menimbulkan benturan kepentingan maupun mengganggu pelaksanaan tugas dan tanggung jawabnya.

Selain itu, Bank menetapkan kebijakan yang memastikan alokasi dan penggunaan dana tanggung jawab sosial dan lingkungan (TJSL) dilakukan secara independen dan bebas dari pengaruh kepentingan pribadi pihak mana pun, baik dari internal Bank termasuk Pemegang Saham, Direksi, Dewan Komisaris, Pejabat Eksekutif, dan pegawai maupun dari pihak eksternal, seperti vendor dan pihak lain di luar Bank. Kebijakan ini diterapkan untuk menjamin bahwa pemanfaatan dana TJSL semata-mata ditujukan bagi kepentingan sosial dan keberlanjutan, serta sejalan dengan prinsip GCG.

Sebagai wujud penerapan prinsip transparansi, Bank melakukan pengungkapan atas pemberian dana untuk kegiatan sosial, termasuk dalam rangka penerapan keuangan berkelanjutan, dan memastikan bahwa setiap pengungkapan paling sedikit mencakup informasi mengenai pihak penerima dana dan jumlah dana yang diberikan, sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.

The Bank is committed to maintaining independence and professionalism in performing its business activities by not lending Bank funds for political activities, as stated in the Bank's Code of Conduct. Nevertheless, the Bank respects the right of all employee to express their personal political aspirations as long as they comply with applicable regulations and do not create a conflict of interest or interfere with the performance of their duties and responsibilities.

Furthermore, the Bank has established a policy that ensures the allocation and use of social and environmental responsibility (TJSL) funds are carried out independently and free from the influence of personal interests of any party, both internally within the Bank, including Shareholders, Board of Directors, Board of Commissioners, Executive Officers, and employees, and externally, such as vendors and other parties outside the Bank. This policy is implemented to ensure that the use of TJSL funds is solely for social and sustainability interests, and in line with GCG principles.

As the manifestation of the principle of transparency, the Bank discloses the provision of funds for social activities, including those related to the implementation of sustainable finance, and ensures that each disclosure includes at least information regarding the recipient of funds and the amount of funds provided, in accordance with applicable laws and regulations.

Persaingan Usaha yang Sehat [POJK F.1]
Fair Business Competition

Dalam menjalankan operasionalnya, Bank Victoria berkomitmen menjunjung tinggi etika bisnis dan persaingan usaha yang sehat. Bank senantiasa mematuhi ketentuan Undang-Undang Anti-Monopoli, melakukan kajian pasar untuk memahami dinamika kompetisi, serta berfokus pada peningkatan mutu produk dan layanan. Bank juga berkomitmen melindungi kepentingan nasabah dari praktik usaha yang tidak adil. Terkait Hak Kekayaan Intelektual (HAKI), Bank mendorong seluruh jajaran untuk menghormati karya pihak lain, berinovasi dalam pengembangan produk dan proses, serta menjaga HAKI yang dimiliki Bank.

In carrying out its operations, Bank Victoria is committed to upholding business ethics and fair competition. The Bank consistently complies with the provisions of Anti-Monopoly Law, conducts market research to understand competitive dynamics, and focuses on improving the quality of its products and services. The Bank is also committed to protecting customer interests from unfair business practices. Regarding Intellectual Property Rights (IPR), the Bank encourages all employees to respect other parties' works, innovate in product and process development, and safeguard the Bank's IPR.

Kode Etik [POJK F.1] [G-07]
Code of Conduct

Bank berkomitmen untuk menegakkan standar etika tertinggi dalam setiap aktivitas operasional. Komitmen tersebut diwujudkan melalui penerapan Kode Etik yang ditetapkan berdasarkan Keputusan Direksi No. 024A/SK-DIR/02/23 tanggal 24 Februari 2023. Kode Etik ini berfungsi sebagai pedoman perilaku bagi seluruh insan Bank dalam menjalankan tugasnya, sehingga setiap tindakan yang diambil senantiasa selaras dengan prinsip profesionalisme, integritas, serta kepatuhan terhadap Visi, Misi, Nilai-Nilai Perusahaan, dan ketentuan peraturan yang berlaku, baik internal maupun eksternal.

The Bank is committed to upholding the highest ethical standards in all operational activities. Such commitment is realized through the implementation of Code of Conduct established by the Board of Directors' Decision No. 024A/SK-DIR/02/23 dated 24 February 2023. This Code of Conduct serves as a guideline for the conduct of all Bank employees in performing their duties, ensuring that every action taken is always in line with the principles of professionalism, integrity, and compliance with the Company's Vision, Mission, Values, and applicable regulations, both internal and external.

Pokok Isi Kode Etik

Pokok isi Kode Etik Bank Victoria sebagai berikut:

Principles of Code of Conduct

The principles of Bank Victoria's Code of Conduct are as follows

1. Standar Etika Bisnis
Standard Business Ethics

a. Etika Bank dengan karyawan.
b. Etika Bank dengan nasabah.
c. Etika Bank dengan penyedia barang dan jasa (evaluasi yang objektif dalam pengadaan perlengkapan dan peralatan Bank).
d. Etika Bank dengan pesaing.
e. Etika Bank dengan pemerintah.
f. Etika Bank dengan masyarakat.
g. Etika Bank dengan media massa.
h. Etika Bank dengan organisasi profesi.

a. Bank's Ethics with employees.
b. Bank's Ethics with customers.
c. Bank's Ethics with provider of goods and services (objective evaluation in the procurement of the Bank's equipment and tools).
d. Bank's Ethics with competitors.
e. Bank's Ethics with the government.
f. Bank's Ethics with the communities.
g. Bank's Ethics with mass media.
h. Bank's Ethics with professional organizations.

2. Standar Perilaku Karyawan
Standard Code of Conduct

a. Tuntunan perilaku karyawan.
b. Penanganan benturan kepentingan.
c. Pedoman pemberian dan penerimaan hadiah dan donasi.
d. Pedoman kepatuhan terhadap peraturan.
e. Pedoman menjaga kerahasiaan data dan informasi perusahaan.
f. Pedoman aktivitas politik.
g. Pedoman pelaporan atas pelanggaran dan perlindungan pelapor.

a. Employee behavior guidelines.
b. Management of conflict of interest.
c. Guidelines for giving and receiving gifts and donations.
d. Regulatory compliance guidelines.
e. Guidelines for maintaining confidentiality of company data and information.
f. Political activity guidelines.
g. Guidelines for reporting violations and protection of whistleblower.

Komitmen Kepatuhan Terhadap Kode Etik

Penerapan Kode Etik mencakup seluruh jenjang organisasi, mulai dari Dewan Komisaris, Direksi, Pejabat Eksekutif, hingga seluruh karyawan. Setiap individu diwajibkan untuk memahami secara menyeluruh isi Kode Etik dan menunjukkan komitmennya melalui penandatanganan Surat Pernyataan yang tercantum pada bagian akhir dokumen tersebut.

Commitment to Complying with Code of Conduct

The implementation of Code of Conduct covers all levels of the organization, from the Board of Commissioners, Board of Directors, Executive Officers, and all employees. Every individual is required to thoroughly understand the Code of Conduct and demonstrate commitment by signing the Statement Letter included at the end of the document.

Penyebarluasan dan Sosialisasi Kode Etik

Bank secara konsisten memastikan pemahaman Kode Etik tertanam kuat di seluruh jajaran melalui berbagai bentuk sosialisasi. Kode Etik tersedia dalam media internal yang dapat diakses kapan saja, dilengkapi dengan komunikasi rutin berupa memo atau surat dari Direksi maupun Divisi terkait. Selain itu, setiap karyawan dibekali buku saku Kode Etik sebagai referensi praktis dalam menjalankan tugas sehari-hari. Pemahaman tersebut juga diperkuat melalui program pelatihan, kegiatan induksi bagi karyawan baru, hingga forum pembelajaran bersama yang melibatkan pihak eksternal.

Circulation and Dissemination of Code of Conduct

The Bank consistently ensures that understanding of the Code of Conduct is firmly embedded throughout all levels through various forms of dissemination. Code of Conduct is available on internal media that is accessible at any time, supplemented by regular communications in the form of memos or letters from the Board of Directors and relevant Divisions. Furthermore, each employee is provided with the Code of Conduct pocket book as a practical reference in performing daily duties. This understanding is also reinforced through training programs, induction activities for new employees, and collaborative learning forums involving external parties.

Upaya Penerapan dan Penegakan Kode Etik

Penerapan dan Penegakan secara Organisasi

1. Dewan Komisaris dibantu oleh Komite Remunerasi dan Nominasi bertanggung jawab atas dipatuhinya Kode Etik di lingkungan Bank.
2. Direksi dibantu oleh Divisi *Human Capital Management & General Affair* bertanggung jawab atas penerapan Kode Etik di lingkungan Bank.
3. Kepala Divisi, Manajer, dan setingkat Manajer bertanggung jawab atas penerapan Kode Etik di lingkungan Divisi/Unit Kerja masing-masing.

Efforts to Implement and Enforce Code of Conduct

Organizational Implementation and Enforcement

1. The Board of Commissioners, supported by the Remuneration and Nomination Committee, is responsible for the compliance of the Code of Conduct within the Bank.
2. The Board of Directors, assisted by the Human Capital Management & General Affair Division, is responsible for the implementation of Code of Conduct within the Bank.
3. The Head of Division, Manager, and managerial levels are responsible for the implementation of Code of Conduct in their respective Division/Unit.

4. Direksi menunjuk Kepala Divisi *Human Capital Management & General Affair* beserta jajarannya yang bertanggung jawab untuk melaporkan pelanggaran terhadap pelaksanaan Kode Etik.
5. Setiap karyawan wajib membaca Kode Etik melalui intranet dan menandatangani formulir pernyataan bahwa yang bersangkutan telah membaca, memahami, dan setuju untuk mematuhi Kode Etik yang didokumentasikan oleh Divisi *Human Capital Management & General Affair*.

Penegakan Pedoman Kode Etik

1. Setiap karyawan Bank harus melaporkan setiap fakta penyimpangan Pedoman Kode Etik Perilaku Karyawan kepada Divisi *Human Capital Management & General Affair* dan identitas pelapor akan dilindungi.
2. Divisi *Human Capital Management & General Affair* menindaklanjuti setiap laporan dan menyampaikan hasil kajiannya kepada Direksi dan/atau Dewan Komisaris sesuai dengan lingkup tanggung jawabnya. Penanganan tindakan penyimpangan terhadap Pedoman Kode Etik Perilaku Karyawan dilakukan melalui penyelidikan yang mendalam dan didasari fakta-fakta yang dapat dipertanggungjawabkan.
3. Direksi dan Dewan Komisaris memutuskan tindakan pembinaan, sanksi disiplin dan/atau tindakan perbaikan serta pencegahan yang harus dilaksanakan oleh atasan langsung di lingkungan masing-masing.
4. Pemberian sanksi bagi pelaku penyimpangan Pedoman Kode Etik Perilaku Karyawan.
5. Bank memiliki pertimbangan dan hak apabila karyawan melanggar Kode Etik/Peraturan Perusahaan/sistem prosedur dengan memberikan langsung surat peringatan ketiga kepada karyawan yang dinilai melakukan penyimpangan berat tanpa perlu surat peringatan pertama dan surat peringatan kedua.

Bentuk Pelanggaran dan Jenis Sanksi

Pelanggaran terhadap Kode Etik diperlakukan sebagai hal yang serius dan akan dikenakan sanksi sesuai tingkatannya. Penentuan sanksi dilakukan dengan mempertimbangkan jenis pelanggaran, tingkat keseriusan, serta evaluasi atas individu yang bersangkutan. Untuk kategori pelanggaran ringan, sanksi dapat berupa teguran lisan hingga surat peringatan pertama, yang dapat ditingkatkan menjadi surat peringatan kedua dan ketiga apabila pelanggaran terus berulang. Dalam kasus tertentu, pelanggaran ringan yang dilakukan secara berulang dapat berujung pada pengunduran diri.

4. The Board of Directors appoints Head of Human Capital Management & General Affair Division including its personnel to be the whistleblower in any violation against the Code of Conduct.
5. It is mandatory for each and every employee to read the Code of Conduct through intranet and sign the statement letter to declare that the respective person has read, understood, and agreed to comply with the Code of Conduct, which thereafter documented by the Human Capital Management & General Affair Division.

Enforcement of Code of Conduct

1. Each of the Bank's employee must report each fact of violation against Employee's Code of Conduct to the Human Capital Management & General Affair Division and the identity of the whistleblower will be protected.
2. Human Capital Management & General Affair Division will follow-up each report to and submit the assessment result to the Board of Directors and/or Board of Commissioners according to the scope of responsibility. Such violation against Employee's Code of Conduct will be handled by indepth investigation based on accountable facts.
3. The Board of Directors and Board of Commissioners will decide on a directional action, disciplinary sanction and/or correctional action and to come up with prevention to be implemented by the direct supervisor in the respective scope.
4. The imposition of sanction for the party violating the Employee's Code of Conduct.
5. The Bank maintains its discretion and right, in the event an employee violates the Code of Conduct/Company Regulations/procedures, by directly giving third warning letter to the relevant employee who is deemed of conducting serious violation without first giving first and second warning letter.

Forms and Types of Sanction

Violations of the Code of Conduct are treated as serious matters and will be subject to appropriate sanctions. Sanctions are determined by considering the type of violation, its seriousness, and evaluation on the individual concerned. For minor violation, sanction can range from a verbal warning to first warning letter, which can be escalated to second and third warning letter if the violation is repeated. In certain cases, repeated minor violations can lead to resignation.

Sementara itu, pelanggaran pada tingkat sedang dikenakan sanksi mulai dari surat peringatan pertama, yang dapat ditingkatkan hingga surat peringatan kedua. Apabila pelanggaran kembali terjadi, sanksi maksimal yang dapat dijatuhkan adalah pengunduran diri. Untuk pelanggaran berat, konsekuensi yang diberikan lebih tegas, mulai dari penghentian kenaikan gaji hingga pengunduran diri, bahkan pada pelanggaran pertama.

Meanwhile, moderate violation is subject to sanctions starting with first warning letter, which can be escalated to second warning letter. In the event of a recurring violation, the maximum sanction to be imposed is resignation. For severe violations, the consequences are stricter, ranging from suspension of salary increase to resignation, even for the first violation.

Setiap sanksi yang dijatuhkan kepada karyawan disesuaikan dengan aturan kepegawaian yang berlaku, sedangkan untuk Dewan Komisaris dan Direksi, mekanisme pemberian sanksi mengacu pada ketentuan Anggaran Dasar Bank serta keputusan RUPS.

Each sanction imposed on employees is in accordance with applicable personnel regulations, while for the Board of Commissioners and Board of Directors, the imposition of sanction mechanism refers to the provisions of the Bank's Articles of Association and the resolutions of GMS.

Laporan Penyimpangan Internal Tahun 2025
Internal Deviation Report in 2025

Penyimpangan (*Internal Fraud*) dalam 1 (Satu) Tahun Internal Fraud in 1 (One) Year	Jumlah Kasus yang Dilakukan oleh Number of Cases Committed by					
	Anggota Dewan Komisaris dan Anggota Direksi Member of Board of Commissioners and Board of Directors		Pegawai Tetap Permanent Employee		Pegawai Tidak Tetap dan Tenaga Kerja Alih Daya Non-Permanent and Outsourced Employees	
	2025	2024	2025	2024	2025	2024
Total *Fraud*	-	-	-	1	**2**	-
Telah Diselesaikan Settled	-	-	-	1	**2**	-
Dalam Proses Penyelesaian di Internal Bank Under Internal Settlement Process in the Bank	-	-	-	-	-	-
Belum Diupayakan Penyelesaian Settlement has not been Sought	-	-	-	-	-	-
Telah Ditindaklanjuti Melalui Proses Hukum Followed-Up through Legal Process	-	-	-	-	-	-

Trend Kualitas Penerapan Kode Etik

Sepanjang tahun 2025, penerapan Kode Etik di lingkungan Bank terlaksana secara konsisten dan efektif. Seluruh karyawan menunjukkan kepatuhan terhadap ketentuan yang berlaku, sehingga nilai-nilai integritas dan profesionalisme dapat terjaga dalam setiap aktivitas operasional.

Trend on Quality of Code of Conduct Implementation

Throughout 2025, the Bank's Code of Conduct was implemented consistently and effectively. All employees demonstrated compliance with applicable regulations, ensuring that the values of integrity and professionalism were maintained in all operational activities.

Program Kepemilikan Saham oleh Manajemen dan Karyawan

Management and Employee Stock Ownership Program

Hingga akhir tahun 2025, Bank belum melaksanakan program kepemilikan saham oleh manajemen (MSOP) maupun program kepemilikan saham oleh karyawan (ESOP). Keputusan tersebut didasarkan pada pertimbangan strategis dan kebutuhan Bank, dengan tetap memperhatikan ketentuan peraturan perundang-undangan yang berlaku. Bank senantiasa membuka peluang untuk mengkaji dan mempertimbangkan implementasi program serupa di masa mendatang apabila dinilai relevan dalam mendukung peningkatan kinerja, motivasi, serta komitmen jangka panjang manajemen dan karyawan terhadap pertumbuhan Bank.

Until the end of 2025, the Bank did not conduct management stock ownership program (MSOP) or an employee stock ownership program (ESOP). This decision is based on strategic considerations and the Bank's needs, while still adhering to applicable laws and regulations. The Bank remains open to reviewing and considering the implementation of similar programs in the future if deemed relevant to support improved performance, motivation, and long-term commitment of management and employees to the Bank's growth.

Kebijakan Pengungkapan Informasi

Information Disclosure Policy

Sesuai dengan Peraturan Otoritas Jasa Keuangan No. 4 Tahun 2024 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka, anggota Dewan Komisaris dan Direksi wajib melaporkan setiap kepemilikan maupun perubahan kepemilikan saham pada perusahaan terbuka kepada Otoritas Jasa Keuangan paling lambat 5 (lima) hari kalender setelah transaksi, serta kepada Perseroan paling lambat 3 (tiga) hari kerja. Di Bank, pelaporan tersebut dilakukan melalui Sekretaris Perusahaan sesuai ketentuan internal guna memastikan kepatuhan regulasi. Sepanjang tahun 2025, laporan kepemilikan saham anggota Dewan Komisaris dan Direksi telah disampaikan kepada Otoritas Jasa Keuangan dan Bursa Efek Indonesia melalui sistem *e-reporting*, dengan rincian jumlah kepemilikan dapat dilihat pada Bab Profil Perusahaan.

Pursuant to the Financial Services Authority Regulation No. 4 of 2024 on Reports of Ownership or Any Changes in Ownership of Public Company Shares, members of Board of Commissioners and Board of Directors are required to report any ownership or changes in share ownership in public company to the Financial Services Authority no later than 5 (five) calendar days after the transaction, and to the Company no later than 3 (three) business days. At the Bank, this reporting is conducted through the Corporate Secretary in accordance with internal regulations to ensure regulatory compliance. Throughout 2025, share ownership reports of members of the Board of Commissioners and Board of Directors were submitted to the Financial Services Authority and Indonesia Stock Exchange through e-reporting system, with the ownership details can be seen in the Company Profile Chapter.

Kebijakan Penerapan Strategi Anti-Korupsi dan Anti-*Fraud* [POJK F.1] [G-07] [G-08]

Anti-Corruption and Anti-Fraud Strategy Implementation Policy

Perkembangan globalisasi dan transformasi digital yang semakin pesat membawa peluang sekaligus tantangan bagi industri perbankan, termasuk meningkatnya risiko terjadinya fraud atau kecurangan. Bentuk fraud dapat bervariasi, mulai dari penyalahgunaan kewenangan, manipulasi informasi, hingga penggelapan aset. Dampaknya tidak hanya menimbulkan kerugian finansial, tetapi juga berpotensi merusak reputasi, menurunkan tingkat kepercayaan nasabah dan pemangku kepentingan, serta menimbulkan risiko sanksi dari otoritas pengawas. Sebagai langkah mitigasi, Bank telah menetapkan Kebijakan Penerapan Strategi *Anti-Fraud* melalui Keputusan Direksi No. 007/SK-DIR/10/24 tanggal 16 Oktober 2024.

The rapid development of globalization and digital transformation bring both opportunities and challenges to banking industry, including the increased risk of fraud. Forms of fraud can vary, ranging from abuse of authority, manipulation of information, to embezzlement of assets. The impact not only results in financial losses but also has the potential to damage reputation, reduce customer and stakeholder trust, and pose the risk of sanctions from supervisory authorities. As a mitigation measure, the Bank has established Anti-Fraud Strategy Implementation Policy through the Board of Directors' Decision No. 007/SK-DIR/10/24 dated 16 October 2024.

Penerapan strategi *anti-fraud* memiliki tujuan utama untuk melindungi integritas, kepercayaan, dan keberlanjutan operasional Bank. Adapun tujuan dari penerapan strategi *anti-fraud,* antara lain:

1. Mengurangi kemungkinan terjadinya tindakan *fraud* melalui penerapan kebijakan dan kontrol yang dirancang untuk menutup celah yang bisa dimanfaatkan untuk kecurangan.
2. Meminimalkan kerugian finansial dan operasional yang dapat timbul akibat *fraud*, serta mengurangi biaya terkait pemulihan dan litigasi sebagai upaya perbaikan proses untuk mencegah kejadian serupa di masa depan.
3. Mempertahankan dan meningkatkan kepercayaan nasabah, investor, dan regulator melalui komitmen yang kuat terhadap pencegahan dan penanganan *fraud.*
4. Memastikan kepatuhan terhadap peraturan dan standar yang ditetapkan oleh regulator seperti Otoritas Jasa Keuangan untuk menghindari sanksi hukum.
5. Meningkatkan kesadaran (*awareness*) *anti-fraud* kepada *risk taking unit* sebagai upaya pencegahan, mitigasi, dan meminimalkan *fraud* yang dapat merugikan Bank secara finansial maupun yang dapat memengaruhi kinerja operasional Bank secara keseluruhan.

The implementation of anti-fraud strategies has the main objective of protecting the integrity, trust, and sustainability of the Bank's operations. The objectives of implementing anti-fraud strategies are among others:

1. Reducing the possibility of fraud by implementing policies and controls designed to close loopholes that may be exploited for fraud.
2. Minimizing financial and operational losses that may arise due to fraud, and reducing costs related to recovery and litigation as process improvement efforts to prevent similar incident in the future.
3. Maintaining and increasing the trust of customers, investors, and regulators through a strong commitment to preventing and handling fraud.
4. Ensuring compliance with regulations and standards set by regulators such as the Financial Services Authority to avoid legal sanctions.
5. Raising anti-fraud awareness to risk taking unit as an effort to prevent, mitigate, and minimize fraud that may harm the Bank financially or that may affect the Bank's overall operational performance.

Sosialisasi Kebijakan Penerapan Strategi *Anti-Fraud*

Untuk memperkuat upaya pencegahan *fraud*, Bank menekankan pentingnya partisipasi aktif dari seluruh karyawan. Komitmen ini diwujudkan melalui program sosialisasi *anti-fraud* yang dilakukan secara berkesinambungan dengan memanfaatkan berbagai media internal dan forum pembelajaran. Sepanjang tahun 2025, Bank telah

Dissemination of Anti-Fraud Strategy Implementation Policy

To strengthen fraud prevention efforts, the Bank emphasizes the importance of active participation from all employees. This commitment is realized through an ongoing anti-fraud dissemination program by utilizing various internal media and learning forums. Throughout 2025, the Bank carried out 2 (two) dissemination activities for

melaksanakan 2 (dua) kali kegiatan sosialisasi penerapan strategi *anti-fraud* dalam bentuk *training*/pelatihan yang dilakukan secara *offline* (cabang dalam kota) maupun *online* (cabang luar kota dan kantor pusat), sehingga karyawan senantiasa memperoleh pemahaman yang terkini mengenai pencegahan kecurangan serta mampu menerapkannya dalam aktivitas kerja sehari-hari.

anti-fraud strategy implementation in the form of training conducted offline (branches within the city) and online (branches outside the city and the head office), so that employees continuously obtain the latest understanding of fraud prevention and are able to apply it in their daily work activities.

Kebijakan Perlakuan Adil terhadap Pemegang Saham [G-08]

Policy on Fair Treatment of Shareholders

Bank menjunjung tinggi prinsip perlakuan yang setara bagi seluruh Pemegang Saham tanpa membedakan status kepemilikan, baik mayoritas maupun minoritas, domestik maupun asing. Komitmen ini dituangkan dalam Surat Keputusan Direksi No. 013/SK-DIR/07/24 tanggal 29 Juli 2024 perihal Kebijakan *Good Corporate Governance* (GCG), yang disusun sesuai dengan ketentuan Otoritas Jasa Keuangan.

Dalam rangka melindungi kepentingan Pemegang Saham, termasuk Pemegang Saham Minoritas, Bank memastikan pemenuhan hak-hak Pemegang Saham secara adil dan proporsional. Hak Pemegang Saham Minoritas, antara lain meliputi:

1. Memperoleh laporan mengenai kondisi keuangan Bank secara tepat waktu.
2. Memperoleh penyelesaian jika Pemegang Saham tidak setuju terhadap aktivitas dan aksi korporasi Bank.
3. Memberikan suara dalam RUPS.
4. Memperoleh dividen berdasarkan keputusan RUPS sesuai dengan ketentuan peraturan perundang-undangan.

Sebagai wujud penerapan prinsip transparansi, Bank menyampaikan informasi yang relevan dan material kepada Pemegang Saham secara terbuka dan tepat waktu melalui berbagai kanal resmi yang mudah diakses, antara lain situs web Bank, Bursa Efek Indonesia, serta Kustodian Sentral Efek Indonesia. Penyampaian informasi tersebut dilakukan dalam 2 (dua) bahasa, yaitu Bahasa Indonesia dan Bahasa Inggris, guna memastikan akses informasi yang setara bagi seluruh Pemegang Saham.

The Bank upholds the principle of equal treatment for all Shareholders, regardless of ownership status, whether majority or minority, domestic or foreign. This commitment is outlined in the Board of Directors' Decision Letter No. 013/SK-DIR/07/24 dated 29 July 2024 on Good Corporate Governance (GCG) Policy, which was prepared in accordance with the provisions of Financial Services Authority.

To protect the interests of Shareholders, including Minority Shareholders, the Bank ensures that Shareholder rights are fulfilled fairly and proportionally. Minority Shareholder rights, include:

1. Receiving timely reports on the Bank's financial condition.
2. Receiving resolution if Shareholders disagree with the Bank's activities and corporate actions.
3. Voting at the GMS.
4. Receiving dividends based on GMS resolutions in accordance with laws and regulations.

As the manifestation of the principle of transparency, the Bank discloses relevant and material information to Shareholders in an open and timely manner through various easily accessible official channels, including the Bank's website, Indonesia Stock Exchange, and Indonesia Central Securities Depository. This information is provided in 2 (two) languages, Indonesian and English, to ensure equal access to information for all Shareholders.

Kebijakan Pencegahan *Insider Trading* [POJK F.1] [G-08]
Policy to Prevent Insider Trading

Sebagai wujud penerapan GCG, Bank telah menetapkan kebijakan pencegahan *insider trading* yang diatur secara tegas dalam Kode Etik. Kebijakan ini bertujuan untuk memastikan bahwa seluruh kegiatan usaha dilakukan secara transparan, adil, dan sesuai dengan prinsip keterbukaan di pasar modal. Dalam kebijakan tersebut, Dewan Komisaris, Direksi, dan seluruh karyawan Bank dilarang menggunakan informasi material yang belum tersedia untuk umum sebagai dasar pengambilan keputusan investasi, maupun menyebarluaskan rencana strategis dan informasi internal lainnya kepada pihak yang tidak berwenang.

Penerapan kebijakan pencegahan *insider trading* ini selaras dengan ketentuan peraturan pasar modal yang berlaku, sekaligus menjadi upaya Bank dalam menjaga kepercayaan Pemegang Saham, investor, regulator, dan pemangku kepentingan lainnya. Dengan adanya pedoman ini, Bank memastikan bahwa setiap tindakan dan keputusan yang diambil senantiasa berlandaskan prinsip integritas, akuntabilitas, serta kepatuhan terhadap regulasi yang mengikat.

As the manifestation of GCG implementation, the Bank has established a policy to prevent insider trading, expressly stipulated in the Code of Conduct. This policy aims to ensure that all business activities are conducted transparently, fairly, and in accordance with the principles of openness in the capital markets. Under this policy, the Board of Commissioners, Board of Directors, and all Bank employees are prohibited from using material information that is not yet publicly available as a basis for investment decisions, or from disseminating strategic plans and other internal information to unauthorized parties.

The implementation of this insider trading prevention policy is in line with applicable capital market regulations and is also part of the Bank's efforts to maintain the trust of shareholders, investors, regulators, and other stakeholders. With these guidelines, the Bank ensures that every action and decision taken is always based on the principles of integrity, accountability, and compliance with binding regulations.

Whistleblowing System [POJK F.1]
Whistleblowing System

Sebagai bagian dari komitmen memperkuat pengendalian internal dan mencegah terjadinya kecurangan, Bank telah membentuk sistem pelaporan pelanggaran (*whistleblowing system*/WBS). Mekanisme ini memberikan ruang bagi karyawan maupun pihak terkait untuk melaporkan dugaan pelanggaran secara aman dan bertanggung jawab. Kehadiran WBS tidak hanya menjadi sarana deteksi dini terhadap potensi *fraud*, tetapi juga berfungsi sebagai instrumen penting dalam menegakkan prinsip GCG. Dengan penerapan sistem ini, Bank berupaya membangun budaya kerja yang menjunjung tinggi transparansi, integritas, serta akuntabilitas.

As part of its commitment to strengthening internal controls and preventing fraud, the Bank has established whistleblowing system (WBS). This mechanism provides a space for employees and related parties to report suspected violations safely and responsibly. The WBS not only serves as a means of early detection of potential fraud but also serves as a crucial instrument in upholding GCG principles. By implementing this system, the Bank strives to build a work culture that upholds transparency, integrity, and accountability.

Kebijakan *Whistleblowing System*

Kebijakan WBS di Bank diatur melalui Keputusan Direksi No. 008/SK-DIR/11/24 tanggal 20 November 2024 tentang Standar Operasional Prosedur *Whistleblowing System*.

Whistleblowing System Policy

The Bank's WBS policy is regulated by the Board of Directors' Decision No. 008/SK-DIR/11/24 dated 20 November 2024 on the Standard Operating Procedures for Whistleblowing

Dokumen ini menjadi pedoman utama yang mengatur tata kelola sistem, mulai dari struktur pengelolaan, alur pelaporan, hingga mekanisme penanganan dugaan pelanggaran. Kebijakan tersebut juga menegaskan adanya perlindungan hukum bagi pelapor, termasuk jenis perlindungan yang diberikan, serta mengatur proses pemantauan dan evaluasi untuk memastikan efektivitas implementasinya.

Selain itu, standar operasional prosedur WBS menetapkan peran dan tanggung jawab pengelola dalam menjalankan fungsi WBS secara transparan dan akuntabel yang diuraikan sebagai berikut:

1. Melaksanakan program promosi dan sosialisasi secara ekstensif dan intensif supaya pelaksanaan prosedur WBS dapat dipahami dengan benar.
2. Menyelenggarakan tata laksana organisasi sedemikian rupa sehingga laporan pelanggaran yang disampaikan dapat ditangani dengan baik serta terdokumentasi dengan baik, namun kerahasiaan pelapor juga tetap terjamin.
3. Melakukan laporan setiap semester kepada Direksi tentang pelaksanaan program WBS terkait laporan dugaan pelanggaran, meliputi sekurang-kurangnya:
   a. Apakah prosedur WBS dapat diterapkan dengan baik dan mendapatkan sambutan yang positif dari karyawan ataupun para pemangku kepentingan lainnya?
   b. Apakah prosedur WBS cukup efektif dalam melakukan deteksi dini dan pencegahan penyimpangan ataupun pelanggaran?
   c. Apakah terdapat suatu pola pelanggaran tertentu yang sering berulang? Apakah kira-kira penyebabnya?
   d. Saran perbaikan untuk meningkatkan efektivitas penerapan WBS dalam mencapai sasaran penciptaan iklim kerja yang terbuka, tulus, dan bertanggung jawab.

Sosialisasi Kebijakan *Whistleblowing System*

Sosialisasi Internal

1. Tim Pengelola WBS secara rutin mengadakan pelatihan untuk meningkatkan kesadaran karyawan terkait WBS.
2. Pengiriman *e-mail* bulanan kepada karyawan untuk memberikan edukasi dan pengingat tentang kebijakan WBS.

Sosialisasi Eksternal

1. Informasi mengenai kebijakan WBS disampaikan melalui situs web Bank.
2. Penyebaran materi WBS melalui buletin internal dan poster yang dipasang di area kerja.
3. Kegiatan sosialisasi etika yang dilakukan kepada pihak eksternal terkait.

System. This document serves as the primary guideline governing system governance, from management structure and reporting flow to mechanisms for handling alleged violations. The policy also emphasizes legal protection for whistleblowers, including the types of protection provided, and regulates monitoring and evaluation process to ensure effective implementation.

Furthermore, standard operating procedures for WBS define the managers' roles and responsibilities in performing WBS function in a transparent and accountable manner, as outlined below:

1. Carry out an extensive and intensive promotion and dissemination program so that the implementation of WBS procedures can be understood correctly.
2. Conduct organizational governance in such a way that the violation report submitted can be handled properly and well documented, but the confidentiality of the reporter is also guaranteed.

3. Conduct a semester report to the Board of Directors on the implementation of WBS program on allegedly infringement reports, which include at least:
   a. Is the WBS procedure properly implemented and gained positive response from employees or other stakeholders?

   b. Is the WBS procedure effective enough in early detection and prevention of irregularities or offenses?
   c. Is there any particular pattern of repeated violations? What are the causes?

   d. Suggestions for improvement to increase the effectiveness of WBS implementation in achieving the objectives of creating an open, sincere, and responsible work climate.

Dissemination of Whistleblowing System Policy

Internal Dissemination

1. The WBS Management Team regularly holds training to increase employee awareness regarding WBS.
2. Sending monthly e-mails to employees to provide education and reminders about WBS policy.

External Dissemination

1. Information on WBS policy is presented through the Bank's website.
2. Dissemination of WBS materials through internal bulletins and posters installed in working areas.
3. Activities of ethics dissemination carried out to related external parties.

Jenis Pelanggaran yang Dapat Dilaporkan

Melalui kebijakan WBS, Bank memberikan saluran pelaporan khusus untuk berbagai bentuk dugaan pelanggaran yang terkait langsung dengan kegiatan maupun kepentingan Bank. Laporan yang disampaikan dibatasi pada tindakan yang terjadi di lingkungan Bank atau melibatkan pihak yang berhubungan dengan Bank. Adapun kategori pelanggaran yang dapat dilaporkan meliputi:

1. Seluruh tindakan melanggar hukum pidana (misalnya: pencurian, penipuan, penggunaan narkoba, dan lain sebagainya).
2. Penyalahgunaan wewenang dalam melayani nasabah, debitur, vendor atau pemasok lainnya (misalnya: penundaan pembayaran tidak beralasan, pemerasan, dan lain sebagainya).
3. Pelanggaran peraturan perbankan yang diatur dalam Undang-Undang tentang Perbankan (misalnya: tidak melaksanakan prinsip kehati-hatian, membuka rahasia nasabah kepada yang tidak berhak, melakukan pencatatan yang tidak benar, meminta uang atas jasa pelayanan perbankan yang dilakukan).
4. Pelanggaran peraturan perpajakan atau aturan pelaporan keuangan perusahaan yang tidak sesuai dengan Pernyataan Standar Akuntansi Keuangan.
5. Perbuatan yang dapat merugikan Bank, baik finansial maupun non-finansial, termasuk mencederai citra Bank.
6. Pelanggaran aturan internal yang dapat menciderai integritas pelaporan perusahaan, baik di bidang keuangan ataupun bidang lainnya.
7. Perbuatan yang membahayakan keselamatan dan kesehatan kerja.

Types of Violation that Can Be Reported

Through WBS policy, the Bank provides a dedicated reporting channel for various forms of alleged violations directly related to the Bank's activities or interests. Reports are limited to actions occurring within the Bank or involving parties related to the Bank. The categories of violations that can be reported include:

1. All actions that violate criminal law (e.g. theft, fraud, drug use, etc.).
2. Misuse of authority in serving the customers, debtors, vendors, or other suppliers (e.g. unwarranted payment delays, extortion, etc.).
3. Violation of banking regulations stipulated in Banking Law (for example: not practicing prudent principles, disclosing customers' confidential information to unauthorized parties, making incorrect records, asking for money for the banking services performed).
4. Violations of tax regulations or corporate financial reporting regulations that are not in accordance with the Statement of Financial Accounting Standards.
5. Acts that may harm the Bank, both financially and nonfinancially, including harm the Bank's image.
6. Violations of internal rules that may jeopardize the integrity of the corporate reporting, whether in finance or other fields.
7. Acts that endanger occupational safety and health.

Cara Penyampaian Laporan Pelanggaran dan Pihak yang Mengelola Pelanggaran

Bank Victoria menyediakan mekanisme WBS yang memberi keleluasaan bagi pelapor dalam menyampaikan dugaan pelanggaran melalui berbagai kanal komunikasi. Laporan dapat disampaikan baik secara tertulis maupun lisan, menggunakan media seperti surat, email, telepon, atau pesan singkat, yang seluruhnya dikelola oleh Departemen *Anti-Fraud* melalui prosedur berikut:

1. Melalui Surat
   Laporan dapat ditujukan kepada Direktur Kepatuhan dan Manajemen Risiko dan ditembuskan kepada Departemen *Anti-Fraud* di alamat Graha BIP Lt. 10, Jl. Gatot Subroto Kav. 23, Karet Semanggi, Setiabudi, Jakarta Selatan, DKI Jakarta 12930.
2. Melalui Email
   a. Departemen Anti-*Fraud,* jika terlapor adalah karyawan, dapat dihubungi melalui email: unitantifraud@victoriabank.co.id.

Mechanism to Submit Whistleblowing Report and Party Managing the Violations

Bank Victoria provides WBS mechanism that allows whistleblowers to freely submit alleged violations through various communication channels. Reports can be submitted either in writing or verbally, using media such as letters, email, telephone, or text messages, all of which are managed by the Anti-Fraud Department through the following procedures:

1. By Mail
   Reports can be addressed to the Director of Compliance and Risk Management with a copy to the Anti-Fraud Department at Gedung Graha BIP Lt. 10 Jl. Gatot Subroto Kav. 23, Kel. Karet Semanggi, Kec. Setiabudi, Jakarta Selatan 12930.
2. By E-mail
   a. Anti-Fraud Department, if the reported party is an employee, can be contacted via e-mail: unitantifraud@victoriabank.co.id.

b. Direktur Kepatuhan dan Manajemen Risiko, jika terlapor adalah anggota Dewan Komisaris, dapat dihubungi melalui email: unitantifrauddireksi@victoriabank.co.id.
c. Dewan Komisaris, jika terlapor adalah anggota Direksi, dapat dihubungi melalui email: unitantifraudkomisaris@victoriabank.co.id.

3. Melalui Telepon atau SMS
Laporan dapat disampaikan melalui nomor telepon atau SMS ke: 0811 9615 009.

Perlindungan bagi Pelapor

Dalam rangka memastikan efektivitas proses penanganan laporan, Bank mendorong pelapor untuk menyertakan identitas diri agar Tim *Anti-Fraud* dapat melakukan klarifikasi dan investigasi secara lebih optimal. Bank menjamin kerahasiaan identitas pelapor yang dijaga sepenuhnya oleh Tim *Anti-Fraud* serta dilindungi oleh komitmen Dewan Komisaris dan Direksi. Informasi dasar yang diharapkan mencakup alamat surat atau email, nomor telepon, maupun nomor telepon seluler. Apabila pelapor menghadapi potensi ancaman sebagai akibat dari laporan yang disampaikan, Bank memiliki kewajiban untuk memberikan perlindungan sebagai berikut:

1. Perlindungan fisik bagi pelapor dan keluarganya.
2. Perlindungan atas harta benda pelapor dan keluarganya terhadap ancaman, teror, atau tindakan balas dendam.
3. Perlindungan administratif, termasuk pencegahan terhadap penundaan kenaikan pangkat, pemecatan, pengucilan di tempat kerja, mutasi yang tidak adil, serta jaminan keamanan kerja.
4. Perlindungan hukum dalam proses litigasi di Pengadilan Negeri, termasuk biaya hukum yang ditanggung, dan jika diperlukan, perlindungan tambahan melalui Lembaga Perlindungan Saksi dan Korban.

Penanganan Pengaduan

Setiap pengaduan yang diterima Bank, baik berupa keluhan, laporan, maupun informasi terkait dugaan tindakan yang berpotensi menimbulkan *fraud*, ditindaklanjuti melalui mekanisme berikut:

1. Jika laporan yang diterima terindikasi pelanggaran *fraud*, maka Departemen *Anti-Fraud* akan melakukan investigasi untuk memastikan kebenaran laporan tersebut.
2. Jika laporan yang diterima termasuk dalam kategori pelanggaran *non-fraud*, maka Departemen *Anti-Fraud* akan menginisiasi tindak lanjut dengan mengoordinasikan laporan tersebut kepada unit kerja terkait untuk penanganan lebih lanjut.

b. Director of Compliance and Risk Management, if the reported party is member of the Board of Commissioners, can be contacted via e-mail: unitantifrauddireksi@victoriabank.co.id.
c. The Board of Commissioners, if the reported party is member of the Board of Directors, can be contacted via email: unitantifraudkomisaris@victoriabank.co.id.

3. By Telephone or SMS
Reports can be submitted via telephone number or SMS to: 0811 9615 009.

Protection for Whistleblower

To ensure the effectiveness of the report handling process, the Bank encourages whistleblowers to include personal identification so that the Anti-Fraud Team can conduct clarification and investigations more effectively. The Bank guarantees the confidentiality of whistleblower's identity, which is fully maintained by the Anti-Fraud Team and protected by the commitment of the Board of Commissioners and Board of Directors. Basic information required includes a mailing or email address, telephone number, and mobile phone number. In the event the whistleblower faces potential threats as a result of the report, the Bank shall provide the following protection:

1. Physical protection for the whistleblower and the family members.
2. Protection for the whistleblower's and family member's properties against threat, terror, or acts of revenge.
3. Administrative protection, including prevention of suspension in promotion, dismissal, expulsion at work, unfair transfer, and position security assurance.
4. Legal protection in the litigation process in the District Court, including legal costs borne, and if necessary, additional protection through Witness and Victim Protection Agency.

Complaint Handling

Every complaint received by the Bank, whether in the form of a complaint, report, or information regarding alleged actions that could potentially lead to fraud, will be followed up through the following mechanisms:

1. If the report received indicates fraud violation, the Anti-Fraud Department will conduct an investigation to ensure the truth of the report.
2. If the report received is included in category of non-fraud violation, the Anti-Fraud Department will initiate follow-up by coordinating the report to relevant work unit for further handling.

Laporan Pelanggaran Tahun 2025 dan Tindak Lanjutnya

Sepanjang tahun 2025, Bank menerima 2 (dua) laporan pelanggaran melalui WBS. Seluruh laporan tersebut telah ditindaklanjuti dan diselesaikan.

Whistleblowing Report in 2025 and Its Follow-Up

Throughout 2025, the Bank received. 2 (two) reports of violations through WBS. All of these reports were followed up and settled.

Akses Informasi dan Data Perusahaan

Access to Company's Information and Data

Bank menyediakan akses informasi dan data perusahaan bagi seluruh pemangku kepentingan melalui berbagai saluran resmi. Informasi keuangan maupun non-keuangan, termasuk laporan wajib, produk dan fasilitas, peluang karier, hingga materi tata kelola dapat diakses melalui situs web resmi Bank di www.victoriabank.co.id. Selain itu, Bank juga membuka jalur komunikasi melalui *call center* di nomor 1500977, email costumercare@victoriabank.co.id, serta media sosial resmi seperti Facebook (@BankVictoriaID), Youtube (Bank Victoria), dan Instagram (@bankvictoria).

Sebagai wujud transparansi, Bank secara rutin mempublikasikan informasi melalui siaran pers dan buletin internal. Pada tahun 2025, Bank telah menerbitkan 21 (dua puluh satu) konten buletin bertajuk Victoria News. Informasi tersebut juga diperkuat dengan media elektronik, termasuk distribusi melalui email corporate secretary di corsec@victoriabank.co.id.

Untuk memudahkan akses, pemangku kepentingan dapat mendaftarkan identitas serta alamat email ke dalam *mailing list* yang disediakan Bank. Dengan demikian, pemangku kepentingan dapat menerima informasi terkini secara berkala dan transparan.

The Bank provides access to company information and data for all stakeholders through various official channels. Financial and non-financial information, including mandatory reports, products and facilities, career opportunities, and governance materials, is accessible through the Bank's official website at www.victoriabank.co.id. Furthermore, the Bank also provides communication channels through its call center at 1500977, email customercare@victoriabank.co.id, and official social media platforms such as Facebook (@BankVictoriaID), YouTube (Bank Victoria), and Instagram (@bankvictoria).

As a form of transparency, the Bank regularly publishes information through press releases and internal bulletins.In 2025, the Bank published 21 (twenty-one) bulletins titled Victoria News. This information is also reinforced through electronic media, including distribution through email to the corporate secretary at corsec@victoriabank.co.id.

For easier access, stakeholders can register their identities and email addresses on the Bank's mailing list. As such, stakeholders can receive the latest information regularly and transparently.

Implementasi Tata Kelola Perusahaan Terbuka
Implementation of Corporate Governance of Public Company

Sepanjang tahun 2025, Bank telah mengimplementasikan prinsip-prinsip GCG dengan berpedoman pada Pedoman Tata Kelola Perusahaan Terbuka sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan No. 21/POJK.04/2015 serta Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015. Penerapan pedoman tersebut diuraikan sebagai berikut:

Throughout 2025, the Bank implemented GCG principles in accordance with the Guidelines for Public Company Governance as stipulated in Financial Services Authority Regulation No. 21/POJK.04/2015 and Financial Services Authority Circular No. 32/SEOJK.04/2015. The implementation of these guidelines is outlined as follows:

Aspek 1: Hubungan Perusahaan Terbuka dengan Pemegang Saham dalam Menjamin Hak-Hak Pemegang Saham
Aspect 1: Relationship between the Public Company and Shareholders in Guaranteeing the Shareholders' Rights

Prinsip 1: Meningkatkan Nilai Penyelenggaraan RUPS.
Principle 1: Increasing the Value of Convening GMS.

Rekomendasi 1: **Recommendation 1:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki cara atau prosedur teknis pengumpulan suara (voting), baik secara terbuka maupun tertutup yang mengedepankan independensi, dan kepentingan Pemegang Saham. The public company has technical voting methods or procedures, either open or close, prioritizing independence, and interest of Shareholders.	Pada RUPS Tahunan 2025, Bank melaksanakan pengambilan keputusan melalui musyawarah untuk mufakat sesuai Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2020. Apabila mufakat tidak tercapai, keputusan diambil melalui pemungutan suara secara terbuka, baik secara langsung maupun melalui eASY.KSEI. Seluruh ketentuan diatur dalam Anggaran Dasar dan tata tertib RUPS yang dibagikan kepada Pemegang Saham serta tersedia di situs web Bank. At the 2025 Annual GMS, the Bank adopted resolutions through deliberation to reach consensus in accordance with Financial Services Authority Regulation No. 15 of 2020. In the event consensus is not reached, resolutions are made through open voting, either in person or through eASY.KSEI. All provisions are stipulated in the Articles of Association and GMS rules of procedure distributed to Shareholders and available on the Bank's website.	Terpenuhi Complied
Rekomendasi 2: **Recommendation 2:**	**Penerapan:** **Implementation:**	**Status:**
Seluruh anggota Direksi dan anggota Dewan Komisaris perusahaan terbuka hadir dalam RUPS Tahunan. All members of Board of Directors and members of Board of Commissioners of the public company attend the Annual GMS.	Dalam RUPS Tahunan 2025, seluruh anggota Direksi dan Dewan Komisaris hadir. In the 2025 Annual GMS, all members of the Board of Directors and Board of Commissioners were present.	Terpenuhi Complied
Rekomendasi 3: **Recommendation 3:**	**Penerapan:** **Implementation:**	**Status:**
Ringkasan risalah RUPS tersedia dalam situs web perusahaan terbuka paling sedikit selama 1 (satu) tahun. Summary of GMS minutes is available on the public company's website for at least 1 (one) year.	Ringkasan Risalah RUPS Tahunan 2025 dalam Bahasa Indonesia dan Inggris diumumkan paling lambat 2 (dua) hari kerja setelah pelaksanaan RUPS melalui situs web Bank, sistem pelaporan elektronik Bursa Efek Indonesia, Otoritas Jasa Keuangan, serta eASY.KSEI. Informasi terkait pelaksanaan RUPS, termasuk Ringkasan Risalah RUPS 5 (lima) tahun terakhir juga tersedia pada situs web Bank. The Summary of Minutes of the 2025 Annual GMS in Indonesian and English are announced no later than 2 (two) working days following GMS implementation via the Bank's website, electronic reporting system of Indonesia Stock Exchange, Financial Services Authority, and eASY.KSEI. Information on GMS implementation, including the Summary of Minutes of GMS for the past 5 (five) years, is also available on the Bank's website.	Terpenuhi Complied

Prinsip 2: Meningkatkan Kualitas Komunikasi Perusahaan Terbuka dengan Pemegang Saham atau Investor.
Principle 2: Increasing the Communication Quality between the Public Company and Shareholders or Investors.

Rekomendasi 4: Recommendation 4:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau investor.	Sebagai wujud keterbukaan informasi, Bank menetapkan kebijakan komunikasi dengan Pemegang Saham yang berpedoman pada Anggaran Dasar. Seluruh informasi penting mengenai kegiatan dan kinerja Bank disampaikan secara transparan serta dapat diakses publik melalui situs web resmi Bank.	Terpenuhi
The public company has communication policy with the Shareholders or investors.	As the manifestation of information transparency, the Bank has established a communication policy with Shareholders guided by the Articles of Association. All important information regarding the Bank's activities and performance is presented transparently and is publicly accessible through the Bank's official website.	Complied
Rekomendasi 5: **Recommendation 5:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka mengungkapkan kebijakan komunikasi perusahaan terbuka dengan Pemegang Saham atau investor dalam situs web.	Bank menjalankan kebijakan komunikasi dengan Pemegang Saham dan investor secara terbuka, dengan memastikan seluruh ketentuan dan mekanisme komunikasi tersebut dipublikasikan melalui situs web resmi Bank.	Terpenuhi
The public company discloses its policy on communication with Shareholders or investors on the website.	The Bank carries out an open communication policy with Shareholders and investors, ensuring that all provisions and communication mechanisms are published on the Bank's official website.	Complied

Aspek 2: Fungsi dan Peran Dewan Komisaris
Aspect 2: Functions and Roles of the Board of Commissioners

Prinsip 3: Memperkuat Keanggotaan dan Komposisi Dewan Komisaris.
Principle 3: Strengthening the Board of Commissioners' Membership and Composition.

Rekomendasi 6: Recommendation 6:	Penerapan: Implementation:	Status:
Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi perusahaan terbuka.	Bank telah memenuhi ketentuan Pasal 20 Peraturan Otoritas Jasa Keuangan No. 33/POJK.04/2014 dan Pasal 35 ayat 1 Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 mengenai susunan Dewan Komisaris. Per 31 Desember 2025, Dewan Komisaris Bank berjumlah 3 (tiga) orang, terdiri atas 2 (dua) Komisaris Independen dan 1 (satu) Komisaris Non-Independen.	Terpenuhi
The determination of number of Board of Commissioners' members considers the public company's condition.	The Bank has complied with the provisions of Article 20 of Financial Services Authority Regulation No. 33/POJK.04/2014 and Article 35 paragraph 1 of Financial Services Authority Regulation No. 17 of 2023 on the composition of the Board of Commissioners. As of 31 December 2025, the Bank's Board of Commissioners comprised 3 (three) members, consisting of 2 (two) Independent Commissioners and 1 (one) Non-Independent Commissioner.	Complied
Rekomendasi 7: **Recommendation 7:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	Komposisi anggota Dewan Komisaris telah memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan.	Terpenuhi
The determination of Board of Commissioners' composition considers the range of expertise, knowledge, and experience required.	The composition of the Board of Commissioners has considered the diversity of skills, knowledge, and experience required.	Complied

Prinsip 4: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris.
Principle 4: Increasing the Quality of Implementation of Board of Commissioners' Duties and Responsibilities.

Rekomendasi 8: Recommendation 8:	Penerapan: Implementation:	Status:
Dewan Komisaris mempunyai kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Dewan Komisaris.	Bank menetapkan mekanisme penilaian kinerja Dewan Komisaris melalui *BOC Charter* sebagai pedoman utama. Proses penilaian beserta hasilnya disampaikan secara transparan dalam Laporan Tahunan ini sebagai bentuk akuntabilitas pelaksanaan tugas pengawasan.	Terpenuhi
The Board of Commissioners has self-assessment policy to assess the Board of Commissioners' performance.	The Bank has established performance assessment mechanism for the Board of Commissioners through BOC Charter as its primary guideline. The assessment process and its results are transparently presented in this Annual Report as a form of accountability for the implementation of supervisory duties.	Complied

Rekomendasi 9: Recommendation 9:	Penerapan: Implementation:	Status:
Kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan perusahaan terbuka. The self-assessment policy to assess the Board of Commissioners' performance is disclosed in the public company's Annual Report.	Penilaian kinerja Dewan Komisaris dilaksanakan berdasarkan kebijakan yang tertuang dalam *BOC Charter*. Hasil penilaian tersebut dipublikasikan dalam Laporan Tahunan ini sebagai bentuk transparansi dan pertanggungjawaban Bank. The performance assessment of the Board of Commissioners is carried out based on the policies outlined in BOC Charter. The results of such assessments are published in this Annual Report as a form of transparency and accountability for the Bank.	Terpenuhi Complied
Rekomendasi 10: **Recommendation 10:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan. The Board of Commissioners has policy related to resignation of the Board of Commissioners' members if involved in financial crime.	Dewan Komisaris berpedoman pada *BOC Charter* yang memuat ketentuan terkait mekanisme pemberhentian apabila terdapat anggota yang terbukti melakukan pelanggaran atau tindak kejahatan di bidang keuangan. The Board of Commissioners is guided by BOC Charter which contains provisions on dismissal mechanism for members found guilty of violations or crimes in financial sector.	Terpenuhi Complied
Rekomendasi 11: **Recommendation 11:**	**Penerapan:** **Implementation:**	**Status:**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi dan remunerasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. The Board of Commissioners or Committee performing nomination and remuneration functions prepares the succession policy for the nomination process of the Board of Directors' members.	Komite Remunerasi dan Nominasi menerapkan kebijakan khusus terkait proses nominasi anggota Direksi, yang disusun secara terstruktur dalam Kebijakan Sistem Nominasi dan Remunerasi sebagai pedoman pelaksanaannya. The Remuneration and Nomination Committee implements a specific policy on the nomination process for members of the Board of Directors, structured in the Nomination and Remuneration System Policy as a guideline for its implementation.	Terpenuhi Complied

Aspek 3: Fungsi dan Peran Direksi
Aspect 3: Functions and Roles of the Board of Directors

Prinsip 5: Memperkuat Keanggotaan dan Komposisi Direksi.
Principle 5: Strengthening the Board of Directors' Membership and Composition.

Rekomendasi 12: Recommendation 12:	Penerapan: Implementation:	Status:
Penentuan jumlah anggota Direksi mempertimbangkan kondisi perusahaan terbuka, serta efektivitas dalam pengambilan keputusan. The determination of number of Board of Directors' members considers the public company's condition and effectiveness in decision-making.	Bank telah memenuhi ketentuan Pasal 20 Peraturan Otoritas Jasa Keuangan No. 33/POJK.04/2014 dan Pasal 6 ayat 1 Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 terkait jumlah Direksi. Per 31 Desember 2025, Direksi Bank berjumlah 5 (lima) orang, dengan penetapan yang disesuaikan dengan kompleksitas dan kebutuhan Bank. The Bank has complied with the provisions of Article 20 of Financial Services Authority Regulation No. 33/POJK.04/2014 and Article 6 paragraph 1 of Financial Services Authority Regulation No. 17 of 2023 on the number of the Board of Directors. As of 31 December 2025, the Bank's Board of Directors consisted of 5 (five) members, with the appointment adjusted to the Bank's complexity and needs.	Terpenuhi Complied
Rekomendasi 13: **Recommendation 13:**	**Penerapan:** **Implementation:**	**Status:**
Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. The determination of Board of Directors' composition considers the range of expertise, knowledge, and experience required.	Komposisi Direksi ditetapkan dengan mempertimbangkan kebutuhan dan kompleksitas usaha Bank, serta memperhatikan keberagaman keahlian, pendidikan, pengalaman, dan gender. Keberagaman ini diharapkan mendukung pengambilan keputusan yang lebih optimal dalam menghadapi tantangan yang kompleks. The composition of the Board of Directors is determined by considering the needs and complexity of the Bank's business, and by paying attention to the diversity of expertise, education, experience, and gender. This diversity is expected to support more optimal decision-making in facing complex challenges.	Terpenuhi Complied
Rekomendasi 14: **Recommendation 14:**	**Penerapan:** **Implementation:**	**Status:**
Anggota Direksi yang membawahi bidang akuntansi atau keuangan memiliki keahlian dan/atau pengetahuan di bidang akuntansi. The Board of Directors' member in charge of accounting or finance has the expertise and/or knowledge in accounting.	Direksi yang menangani bidang akuntansi dan keuangan memiliki latar belakang dan pengalaman profesional yang memadai di sektor keuangan dan akuntansi, sehingga mampu mendukung pengelolaan keuangan Bank secara efektif. The Board of Directors responsible for accounting and finance have adequate professional backgrounds and experience in finance and accounting sectors, thus enabling them to effectively support the Bank's financial management.	Terpenuhi Complied

Prinsip 6: Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi.
Principle 6: Increasing the Quality of Implementation of Board of Directors' Duties and Responsibilities.

Rekomendasi 15: Recommendation 15:	Penerapan: Implementation:	Status:
Direksi mempunyai kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Direksi.	Bank melaksanakan penilaian kinerja Direksi berdasarkan ketentuan yang tercantum dalam *BOD Charter*. Hasil penilaian tersebut disampaikan secara transparan dalam Laporan Tahunan ini sebagai bentuk akuntabilitas terhadap pelaksanaan tugas dan tanggung jawab Direksi.	Terpenuhi
The Board of Directors has self-assessment policy to assess the Board of Directors' performance.	The Bank conducts performance assessments of the Board of Directors based on the provisions stated in BOD Charter. The results of these assessments are transparently presented in this Annual Report as a form of accountability for the implementation of the Board of Directors' duties and responsibilities.	Complied
Rekomendasi 16: **Recommendation 16:**	**Penerapan:** **Implementation:**	**Status:**
Kebijakan penilaian sendiri *(self-assessment)* untuk menilai kinerja Direksi diungkapkan melalui laporan tahunan perusahaan terbuka.	Penilaian kinerja Direksi dilakukan sesuai dengan pedoman yang tertuang dalam *BOD Charter*. Hasil evaluasi ini dipublikasikan dalam Laporan Tahunan sebagai bentuk transparansi dan pertanggungjawaban Bank atas kinerja Direksi.	Terpenuhi
The self-assessment policy to assess the Board of Directors' performance is disclosed in the public company's Annual Report.	The performance assessments of the Board of Directors are conducted in accordance with the guidelines stated in BOD Charter. This evaluation results are published in the Annual Report as a form of transparency and accountability of the Bank for the performance of the Board of Directors.	Complied
Rekomendasi 17: **Recommendation 17:**	**Penerapan:** **Implementation:**	**Status:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan.	Direksi menerapkan ketentuan *BOD Charter* yang memuat mekanisme pemberhentian anggota apabila terbukti melakukan pelanggaran atau keterlibatan dalam tindak kejahatan di bidang keuangan.	Terpenuhi
The Board of Directors has policy related to resignation of the Board of Directors' members if involved in financial crime.	The Board of Directors implements the provisions of BOD Charter, which outlines a mechanism for dismissing members if proven to have committed violations or been involved in financial crimes.	Complied

Aspek 4: Partisipasi Pemangku Kepentingan
Aspect 4: Stakeholders Participation

Prinsip 7: Meningkatkan Aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan.
Principle 7: Increasing the Corporate Governance Aspect Through Stakeholders Participation.

Rekomendasi 18: Recommendation 18:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki kebijakan untuk mencegah terjadinya *insider trading*.	Bank menetapkan kebijakan pencegahan *insider trading* sebagai bagian dari Kode Etik, guna memastikan seluruh aktivitas transaksi saham dan informasi internal dilakukan secara etis dan sesuai peraturan yang berlaku.	Terpenuhi
The public company has a policy to prevent the occurrence of insider trading.	The Bank has established insider trading prevention policy as part of its Code of Conduct, to ensure that all stock transactions and internal information are conducted ethically and in accordance with applicable regulations.	Complied
Rekomendasi 19: **Recommendation 19:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan anti-korupsi dan *anti-fraud*.	Bank melaksanakan program dan prosedur pencegahan korupsi serta *fraud* berdasarkan Keputusan Direksi No. 007/SK-DIR/10/24 tentang Kebijakan Penerapan Strategi *Anti-Fraud* dan No. 008/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Standar Operasional Prosedur Penerapan Strategi *Anti-Fraud*. Ketentuan ini juga tercantum dalam Kode Etik sebagai pedoman etika dan kepatuhan bagi seluruh pegawai.	Terpenuhi
The public company has anti-corruption and anti-fraud policy.	The Bank implements corruption and fraud prevention programs and procedures based on the Board of Directors' Decision No. 007/SK-DIR/10/24 on Anti-Fraud Strategy Implementation Policy and No. 008/SK-DIR/10/24 dated 16 October 2024 on Standard Operating Procedures for Implementing Anti-Fraud Strategies. These provisions are also stated in the Code of Conduct as ethical and compliance guidelines for all employees.	Complied
Rekomendasi 20: **Recommendation 20:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor.	Bank menerapkan kebijakan seleksi dan pengembangan kemampuan pemasok atau vendor melalui Surat Keputusan Direktur No. 027/SK-DIR/06/23 tanggal 27 Juni 2023 tentang Kebijakan Pengadaan Inventaris/Barang Lainnya dan Jasa.	Terpenuhi
The public company has a policy on selection and improvement of supplier's or vendor's capabilities.	The Bank implements supplier or vendor selection and development policy through the Board of Directors' Decision Letter No. 027/SK-DIR/06/23 dated 27 June 2023 on Procurement Policy for Inventory/Other Goods and Services.	Complied

Rekomendasi 21: Recommendation 21:	Penerapan: Implementation:	Status:
Perusahaan terbuka memiliki kebijakan tentang pemenuhan hak-hak kreditur. The public company has a policy on the fulfillment of creditor's rights.	Bank menetapkan kebijakan pemenuhan hak-hak kreditur sebagai bagian dari Kode Etik, guna memastikan perlindungan dan penghormatan terhadap hak kreditur dalam seluruh kegiatan operasional Bank. The Bank has established creditor rights fulfillment policy as part of its Code of Conduct, to ensure the protection and respect of creditor rights in all Bank operations.	Terpenuhi Complied
Rekomendasi 22: **Recommendation 22:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan sistem WBS. The public company has a policy on WBS system.	Bank menerapkan dan memutakhirkan sistem WBS melalui Keputusan Direksi No. 007/SK-DIR/10/24 tentang Kebijakan Penerapan Strategi *Anti-Fraud* dan No. 008/SK-DIR/10/24 tanggal 16 Oktober 2024 tentang Standar Operasional Prosedur Penerapan Strategi *Anti-Fraud*, untuk memastikan pelaporan pelanggaran dilakukan secara efektif dan terpercaya. The Bank has implemented and updated its WBS system through the Board of Directors' Decision No. 007/SK-DIR/10/24 on Anti-Fraud Strategy Implementation Policy and No. 008/SK-DIR/10/24 dated 16 October 2024 on Standard Operating Procedures for Implementing Anti-Fraud Strategy, to ensure an effective and reliable reporting of violations.	Terpenuhi Complied
Rekomendasi 23: **Recommendation 23:**	**Penerapan:** **Implementation:**	**Status:**
Perusahaan terbuka memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan. The public company has a policy on provision of longterm incentive for the Board of Directors and employees.	Bank melaksanakan program insentif jangka panjang untuk Direksi dan karyawan sesuai dengan Keputusan Direksi No. 001A/SK-DIR/12/22 tanggal 1 Desember 2022 tentang Kebijakan dan Prosedur *Human Capital Management*. Pemberian insentif ini dicatat dalam Laporan Keuangan pada pos Liabilitas Imbalan Kerja dan dijabarkan dalam Laporan Tahunan sebagai bagian dari transparansi pelaporan. The Bank implements a long-term incentive program for Board of Directors and employees in accordance with the Board of Directors' Decision No. 001A/SK-DIR/12/22 dated 1 December 2022 on Human Capital Management Policies and Procedures. This incentive program is recorded in the Financial Statements under Employee Benefits Liabilities and detailed in the Annual Report as part of reporting transparency.	Terpenuhi Complied

Aspek 5: Keterbukaan Informasi
Aspect 5: Information Disclosure

Prinsip 8: Meningkatkan Pelaksanaan Keterbukaan Informasi.
Principle 8: Increasing the Implementation of Information Disclosure.

Rekomendasi 24: Recommendation 24:	Penerapan: Implementation:	Status:
Perusahaan terbuka memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs web sebagai media keterbukaan informasi. The public company utilizes information technology more broadly, in addition to the website, as a media for information disclosure.	Bank telah mengelola situs web perusahaan seoptimal mungkin untuk selalu menyediakan informasi yang terbaru dan akurat untuk Publik. Selain situs web, Bank juga memanfaatkan teknologi dan aplikasi media sosial lainnya seperti *mobile banking*, *internet banking*, Instagram, Facebook, dan Youtube untuk media keterbukaan informasi. The Bank has optimally managed its corporate website to consistently provide the most up-to-date and accurate information to the public. In addition to website, the Bank also utilizes technology and other social media applications, such as mobile banking, internet banking, Instagram, Facebook, and YouTube, for information transparency.	Terpenuhi Complied
Rekomendasi 25: **Recommendation 25:**	**Penerapan:** **Implementation:**	**Status:**
Laporan Tahunan perusahaan terbuka mengungkapkan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka paling sedikit 5%, selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham perusahaan terbuka melalui Pemegang Saham Utama dan Pengendali. The public company's Annual Report discloses the ultimate beneficial owner of the public company's share ownership of at least 5%, in addition to the disclosure of the ultimate beneficial owner in the share ownership of public company through the Main and Controlling Shareholders.	Laporan Tahunan Bank menyajikan informasi mengenai pemilik manfaat akhir atas kepemilikan saham, serta identitas Pemegang Saham Utama dan Pengendali, yang disampaikan secara transparan dalam bab Profil Perusahaan. The Bank's Annual Report presents information on the ultimate beneficial owners of share ownership, as well as identities of Main and Controlling Shareholders, transparently disclosed in the Company Profile chapter.	Terpenuhi Complied

Pedoman Umum Governansi Korporat Indonesia

General Guidelines for Indonesian Corporate Governance

Sebagai acuan dalam memperkuat praktik tata kelola yang selaras dengan standar internasional, Komite Nasional Kebijakan Governansi (KNKG) menerbitkan Pedoman Umum Governansi Korporat Indonesia (PUGKI) 2021. Pedoman ini ditujukan khususnya bagi perusahaan yang tercatat di pasar modal serta entitas yang mengelola dana masyarakat, termasuk Bank. Dalam penerapannya, Bank mengadopsi prinsip dan rekomendasi yang tertuang dalam PUGKI 2021 dengan menggunakan pendekatan "terpenuhi atau penjelasan". Melalui pendekatan ini, Bank memastikan penerapan prinsip governansi dilakukan secara transparan, dengan uraian implementasi sebagai berikut:

As a reference for strengthening corporate governance practices in line with international standards, the National Committee for Governance Policy (KNKG) issued the 2021 General Guidelines for Indonesian Corporate Governance (PUGKI). These guidelines are intended specifically for companies listed on capital market and entities managing public funds, including the Bank. In its implementation, the Bank adopts the principles and recommendations outlined in the 2021 PUGKI by using a "complied or explanation" approach. Through this approach, the Bank ensures a transparent implementation of governance principles, with the following implementation details:

Prinsip 1: Peran dan Tanggung Jawab Direksi dan Dewan Komisaris
Principle 1: Roles and Responsibilities of the Board of Directors and Board of Commissioners

Rekomendasi 1.1: Peran dan Tanggung Jawab Direksi.
Recommendation 1.1: Roles and Responsibilities of the Board of Directors.

Rekomendasi 1.1.1: **Recommendation 1.1.1:**	**Keterangan:** **Description:**	**Status:**
Untuk mencapai penciptaan nilai yang berkelanjutan, Direksi menjalankan peran kepemimpinannya dan berupaya mencapai hasil governansi sebagai berikut: 1. Berdaya saing dan berfokus ke kinerja jangka panjang. 2. Beretika dan bertanggung jawab dalam menjalankan bisnis. 3. Berkontribusi positif terhadap masyarakat dan lingkungan. 4. Berkemampuan dalam bertahan dan bertumbuh (*corporate resilience*).	Direksi melaksanakan tugas dan tanggung jawabnya dengan menekankan pencapaian kinerja jangka panjang, penerapan prinsip etika bisnis, tanggung jawab sosial dan lingkungan, serta upaya berkelanjutan dalam meningkatkan efektivitas dan pertumbuhan Bank.	Terpenuhi
To achieve sustainable value creation, the Board of Directors carries out its leadership role and seeks to achieve the following governance results: 1. Be competitive and focused on long-term performance. 2. Be ethical and responsible in conducting business. 3. Have positive contributions to the community and the environment. 4. Be able to survive and grow (corporate resilience).	The Board of Directors performs its duties and responsibilities by emphasizing long-term performance achievement, application of ethical business principles, social and environmental responsibility, and ongoing efforts to improve the Bank's effectiveness and growth.	Complied
Rekomendasi 1.1.2: **Recommendation 1.1.2:**	**Keterangan:** **Description:**	**Status:**
Direksi harus memastikan bahwa misi, visi, tujuan, sasaran, strategi, dan rencana tahunan dan jangka menengah korporasi konsisten dengan tujuan jangka panjang, dengan memanfaatkan inovasi dan teknologi secara efektif.	Direksi menekankan penguatan infrastruktur teknologi serta pengembangan inovasi digital sebagai upaya strategis untuk mendukung pencapaian visi, misi, dan target operasional Bank baik dalam jangka pendek maupun jangka panjang.	Terpenuhi
The Board of Directors must ensure that the corporate mission, vision, goals, objectives, strategies, and annual as well as mid-term plans are consistent with the long-term goals, by effectively utilizing innovation and technology.	The Board of Directors emphasizes strengthening technology infrastructure and developing digital innovation as strategic efforts to support the achievement of the Bank's vision, mission, and operational targets in both the short and long term.	Complied
Rekomendasi 1.1.3: **Recommendation 1.1.3:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan bahwa korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan visi, misi, tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan dan standar yang berlaku.	Direksi mengelola manajemen risiko dan SPI secara efektif dan proaktif, sesuai dengan peraturan perundang-undangan dan standar yang berlaku, guna mendorong pencapaian kinerja berkelanjutan serta memperkuat daya saing Bank.	Terpenuhi
The Board of Directors ensures that the corporation implements an appropriate and effective risk management and internal control system, that is aligned with the corporate vision, mission, goals, objectives, and strategies, as well as complies with applicable laws and regulations and standards.	The Board of Directors manages risk management and SPI effectively and proactively, in accordance with applicable laws and standards, to encourage sustainable performance and strengthen the Bank's competitiveness.	Complied

Rekomendasi 1.1.4: Recommendation 1.1.4:	Keterangan: Description:	Status:
Direksi memastikan integritas akuntansi dan sistem pelaporan keuangan korporasi dan pengungkapan yang tepat waktu dan akurat atas semua informasi material mengenai korporasi. The Board of Directors ensures the integrity of corporate accounting and financial reporting system and the timely and accurate disclosure of all material information on the corporation.	Direksi menjamin keandalan akuntansi dan sistem pelaporan keuangan Bank, serta memastikan pengungkapan informasi material dilakukan tepat waktu dan akurat. Upaya ini merupakan bagian dari penerapan manajemen risiko untuk menjaga transparansi serta membangun kepercayaan pemangku kepentingan. The Board of Directors guarantees the reliability of the Bank's accounting and financial reporting systems, as well as ensures a timely and accurate disclosure of material information. These efforts are part of risk management implementation to maintain transparency and build stakeholder trust.	Terpenuhi Complied
Rekomendasi 1.1.5: **Recommendation 1.1.5:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan pelaporan keberlanjutan telah disusun sebagaimana mestinya. The Board of Directors ensures that sustainability reporting has been prepared properly.	Direksi menerapkan prinsip-prinsip keberlanjutan dalam seluruh kegiatan Bank dan memastikan penyusunan Laporan Keberlanjutan dilakukan sesuai dengan peraturan perundang-undangan serta standar yang berlaku. The Board of Directors applies sustainability principles in all Bank activities and ensures that the Sustainability Report is prepared in accordance with applicable laws and regulations and standards.	Terpenuhi Complied
Rekomendasi 1.1.6: **Recommendation 1.1.6:**	**Keterangan:** **Description:**	**Status:**
Direksi membangun kerangka kerja untuk governansi teknologi informasi korporasi yang selaras dengan kebutuhan dan prioritas bisnis korporasi, mendorong peluang dan kinerja bisnis, memperkuat manajemen risiko, serta mendukung tujuan dan strategi korporasi. The Board of Directors builds a framework for corporate information technology governance that is aligned with corporate business needs and priorities, drives business opportunities and performance, strengthens risk management, as well as supports corporate goals and strategies.	Direksi secara konsisten mengembangkan dan memutakhirkan kerangka tata kelola TI Bank untuk mendukung kebutuhan dan prioritas bisnis. Implementasi governansi TI mencakup penyelarasan rencana strategis TI dengan strategi bisnis, pemanfaatan dan optimalisasi sumber daya TI, pengukuran kinerja, serta manajemen risiko yang efektif, selaras dengan peraturan perundang-undangan yang berlaku. The Board of Directors consistently develops and updates the Bank's IT governance framework to support business needs and priorities. The implementation of IT governance includes aligning IT strategic plan with business strategy, utilizing and optimizing IT resources, measuring performance, and effectively managing risks in accordance with applicable laws and regulations.	Terpenuhi Complied
Rekomendasi 1.1.7: **Recommendation 1.1.7:**	**Keterangan:** **Description:**	**Status:**
Bagi korporasi yang menjalankan kegiatan usaha berdasarkan prinsip syariah, Direksi perlu memastikan kewenangan dan ketersediaan perangkat pendukung yang memadai agar Dewan Pengawas Syariah dapat menjalankan perannya dengan efektif. For corporations that conduct business activities based on sharia principles, the Board of Directors needs to ensure the authority and availability of adequate supporting tools, allowing the Sharia Supervisory Board to carry out its role effectively.	Sepanjang tahun 2025, Bank tidak menyelenggarakan kegiatan usaha yang berbasis pada prinsip syariah. Throughout 2025, the Bank did not conduct any business activities based on sharia principles.	Penjelasan Explanation
Rekomendasi 1.1.8: **Recommendation 1.1.8:**	**Keterangan:** **Description:**	**Status:**
Piagam Direksi secara periodik ditinjau. Piagam mencakup, antara lain pembagian peran Direktur secara individual dapat diatur di Piagam Direksi atau dengan surat keputusan Direksi. The Board of Directors' Charter is periodically reviewed. The Charter includes, among others, the division of roles for the Directors individually, which can be regulated in the Board of Directors' Charter or by a decision letter of the Board of Directors.	*BOD Charter* ditinjau secara rutin dan terakhir diperbarui pada 6 Desember 2023. Dokumen ini juga telah dipublikasikan pada situs web resmi Bank (www.victoriabank.co.id) untuk akses publik. BOD Charter is regularly reviewed and last updated on 6 December 2023. This document is also published on the Bank's official website (www.victoriabank.co.id) for public access.	Terpenuhi Complied
Rekomendasi 1.1.9: **Recommendation 1.1.9:**	**Keterangan:** **Description:**	**Status:**
Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. The Board of Directors has a policy on resignation of members of the Board of Directors if involved in a financial crime and are proven to have made a mistake.	Direksi memiliki *BOD Charter* yang memuat ketentuan pemberhentian anggota apabila terbukti melakukan pelanggaran atau terlibat dalam tindak kejahatan di bidang keuangan. The Board of Directors has BOD Charter that contains provisions for dismissing members if proven to have committed violations or been involved in financial crimes.	Terpenuhi Complied

Rekomendasi 1.2: Penilaian Kinerja - Direksi dan Anggotanya.
Recommendation 1.2: Performance Assessment - Board of Directors and its Members.

Rekomendasi 1.2.1: **Recommendation 1.2.1:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif dan independen untuk menentukan efektivitas Direksi dan setiap individu Direktur. The Board of Commissioners conducts an annual formal evaluation objectively and independently to determine the effectiveness of the Board of Directors and each individual Director.	Bank melaksanakan penilaian kinerja Direksi melalui 2 (dua) pendekatan, yakni evaluasi mandiri dan evaluasi oleh Dewan Komisaris, yang dilakukan minimal sekali setiap tahun. Proses ini bertujuan untuk memastikan efektivitas kepemimpinan serta pencapaian sasaran Bank, dengan rincian prosedur dan hasil penilaian disajikan dalam bagian Penilaian Kinerja Direksi pada Laporan Tahunan ini. The Bank conducts performance assessments of the Board of Directors through 2 (two) approaches, namely self-evaluation and evaluation by the Board of Commissioners, which are conducted at least once a year. This process aims to ensure leadership effectiveness and the achievement of the Bank's targets. Details of the procedures and assessment results are presented in the Board of Directors' Performance Assessment section of this Annual Report.	Terpenuhi Complied
Rekomendasi 1.2.2: **Recommendation 1.2.2:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris dengan pertimbangan Komite Remunerasi dan Nominasi, bertanggung jawab menentukan kriteria evaluasi kinerja dan menilai kinerja Direktur Utama dan anggota Direksi lainnya. The Board of Commissioners, with considerations from the Remuneration and Nomination Committee, is responsible for determining performance evaluation criteria and assessing the performance of the President Director and other members of the Board of Directors.	Dewan Komisaris melakukan penilaian kinerja Direksi dengan menggunakan kriteria yang telah mempertimbangkan masukan dari Komite Remunerasi dan Nominasi. The Board of Commissioners assesses the Board of Directors' performance by using criteria that consider input from the Remuneration and Nomination Committee.	Terpenuhi Complied

Rekomendasi 1.3: Peran dan Tanggung Jawab Dewan Komisaris.
Recommendation 1.3: Roles and Responsibilities of the Board of Commissioners.

Rekomendasi 1.3.1: **Recommendation 1.3.1:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengkaji ulang strategi korporasi paling tidak setiap tahun dan menyetujui misi, visi dan strategi korporasi yang dirumuskan oleh Direksi. Dewan Komisaris juga mengkaji ulang, memberikan saran dan menyetujui rencana bisnis dan rencana keuangan jangka panjang dan rencana keuangan jangka pendek korporasi. Dewan Komisaris memberikan advis dan melakukan pemantauan kepada Direksi atas pengelolaan implementasinya. Direksi dan Dewan Komisaris terlibat dalam keputusan yang sangat penting bagi korporasi, diatur dalam Anggaran Dasar korporasi. The Board of Commissioners reviews the corporate strategy at least annually and approves the corporate mission, vision, and strategy formulated by the Board of Directors. The Board of Commissioners also reviews, provides advice, and approves long-term business and financial plans and the company's short-term financial plans. The Board of Commissioners provides advice and monitors the Board of Directors on the management of its implementation. The Board of Directors and Board of Commissioners are involved in decisions deemed crucial for the corporation, as regulated in the Articles of Association of the company.	Dewan Komisaris meninjau strategi Bank secara berkala setiap tahun dengan memberikan persetujuan atas dokumen RBB serta Rencana Kerja dan Anggaran Perusahaan (RKAP), termasuk revisinya. Selain itu, Dewan Komisaris memberikan arahan dan memantau pelaksanaan strategi melalui rapat bersama Direksi untuk mengevaluasi kinerja Bank. Sebagai bagian dari fungsi pengawasan, Dewan Komisaris menyusun Laporan Pengawasan RBB yang disampaikan kepada otoritas berwenang setiap semester. The Board of Commissioners periodically reviews the Bank's strategy on an annual basis by approving RBB document and Corporate Work Plan and Budget (RKAP), including their revisions. Furthermore, the Board of Commissioners provides direction and monitors strategy implementation through joint meetings with the Board of Directors to evaluate the Bank's performance. As part of its supervisory function, the Board of Commissioners prepares RBB Supervision Report which is submitted to the relevant authorities every semester.	Terpenuhi Complied
Rekomendasi 1.3.2: **Recommendation 1.3.2:**	**Keterangan:** **Description:**	**Status:**
Jenis keputusan yang memerlukan persetujuan Dewan Komisaris harus diungkapkan dalam Laporan Tahunan. The types of decisions that require the Board of Commissioners' approval must be disclosed in the Annual Report.	Jenis keputusan yang memerlukan persetujuan Dewan Komisaris telah dijabarkan dan disampaikan dalam pembahasan Dewan Komisaris pada Laporan Tahunan ini. The types of decisions requiring Board of Commissioners' approval are outlined and presented in the discussion of the Board of Commissioners in this Annual Report.	Terpenuhi Complied

Rekomendasi 1.3.3: Recommendation 1.3.3:	Keterangan: Description:	Status:
Dengan memperhatikan rekomendasi Komite Remunerasi dan Nominasi, Dewan Komisaris mengusulkan kepada, dan untuk diputuskan oleh, RUPS pengangkatan dan/atau pemberhentian anggota Direksi dan anggota Dewan Komisaris. Dalam mengusulkan hal di atas, Dewan Komisaris memperhatikan keberagaman, unsur non-diskriminatif, dan memberikan kesempatan yang sama tanpa membedakan suku, agama, ras, antar golongan, dan gender. Dewan Komisaris memastikan proses pencalonan dan pemilihan anggota Direksi dan anggota Dewan Komisaris adalah formal dan transparan.	Merujuk pada Pedoman Tata Tertib Komite Remunerasi dan Nominasi tanggal 5 Januari 2024 serta Kebijakan Penerapan Tata Kelola Remunerasi No. 011/SK-KOM/01/24 tanggal 17 Januari 2024, Dewan Komisaris berperan aktif dalam proses pengangkatan dan pemberhentian anggota Dewan Komisaris maupun Direksi. Proses nominasi dilakukan dengan mempertimbangkan rekomendasi Komite Remunerasi dan Nominasi, menjunjung prinsip keberagaman, kesetaraan, dan transparansi, serta memastikan integritas dan kualitas kepemimpinan di Bank.	Terpenuhi
Taking into account the recommendations from the Remuneration and Nomination Committee, the Board of Commissioners proposes to, and to be resolved by, the GMS the appointment and/or dismissal of members of the Board of Directors and members of the Board of Commissioners. In proposing the above, the Board of Commissioners pays attention to the diversity, non-discriminatory elements, and provides equal opportunities regardless of ethnicity, religion, race, class, and gender. The Board of Commissioners ensures a formal and transparent nomination and selection process for members of the Board of Directors and members of the Board of Commissioners.	Referring to the Remuneration and Nomination Committee's Code of Conduct dated 5 January 2024 and Remuneration Governance Implementation Policy No. 011/SK-KOM/01/24 dated 17 January 2024, the Board of Commissioners plays an active role in the process of appointing and dismissing members of the Board of Commissioners and Board of Directors. Nomination process is conducted by considering the recommendations of the Remuneration and Nomination Committee, upholding the principles of diversity, equality, and transparency, and ensuring the integrity and quality of leadership within the Bank.	Complied
Rekomendasi 1.3.4: **Recommendation 1.3.4:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris atau Komite yang menjalankan fungsi nominasi menyusun kebijakan suksesi dalam proses nominasi anggota Direksi. Setiap tahun Dewan Komisaris meninjau pelaporan pelaksanaan rencana pengembangan dan suksesi yang disampaikan Direktur Utama.	Sebagai bagian dari persiapan regenerasi kepemimpinan, Bank menetapkan dan melaksanakan kebijakan suksesi Direksi sesuai Pedoman Kerja Komite Remunerasi dan Nominasi. Kebijakan ini dirancang untuk menjamin kelanjutan kepemimpinan yang efektif dan transparan, serta disampaikan dalam Laporan Tahunan sebagai bukti komitmen Bank terhadap penerapan GCG secara berkelanjutan.	Terpenuhi
The Board of Commissioners or the Committee conducting the nomination function prepares a succession policy in the process of nominating members of the Board of Directors. Every year, the Board of Commissioners reviews the report on implementation of development and succession plans submitted by the President Director.	As part of preparation for leadership regeneration, the Bank has established and implemented Board of Directors' succession policy in accordance with the Remuneration and Nomination Committee's Charter. This policy is designed to ensure effective and transparent leadership continuity and is presented in the Annual Report as the evidence of the Bank's commitment to sustainable GCG implementation.	Complied
Rekomendasi 1.3.5: **Recommendation 1.3.5:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris: 1. Mengajukan kepada RUPS, yang dapat didahului oleh usulan dari komite yang menjalankan fungsi remunerasi, besaran remunerasi anggota Direksi dan anggota Dewan Komisaris yang selaras dengan pengembangan korporasi yang berkelanjutan dan kepentingan jangka panjang korporasi dan Pemegang Saham. 2. Secara berkala mengkaji ulang sistem remunerasi Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi menelaah dan membahas remunerasi Dewan Komisaris serta Direksi dengan mempertimbangkan skala dan kompleksitas usaha, perbandingan dengan peer group, tingkat inflasi, kondisi keuangan Bank, serta kesesuaian dengan peraturan perundang-undangan yang berlaku. Rekomendasi tersebut dipelajari oleh Dewan Komisaris dan diajukan kepada RUPS. Sistem remunerasi juga ditinjau secara berkala untuk menyesuaikan dengan perkembangan kegiatan Bank dan ketentuan yang berlaku.	Terpenuhi
The Board of Commissioners: 1. Submits to the GMS, which may be preceded by recommendation from the committee conducting remuneration function, the remuneration amount for members of the Board of Directors and members of the Board of Commissioners, in line with the sustainable corporate development and long-term interests of the corporation and Shareholders. 2. Periodically reviews the remuneration system for the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee reviews and discusses remuneration of the Board of Commissioners and Board of Directors by considering business scale and complexity, comparison with peer group, inflation rate, the Bank's financial condition, and compliance with applicable laws and regulations. Such recommendations are reviewed by the Board of Commissioners and submitted to the GMS. The remuneration system is also reviewed periodically to adjust it with the Bank's operational developments and applicable regulations.	Complied
Rekomendasi 1.3.6: **Recommendation 1.3.6:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengawasi efektivitas kebijakan governansi korporat dan implementasinya serta mengusulkan perubahan jika diperlukan.	Dewan Komisaris, baik secara langsung maupun melalui komite terkait, terus melakukan pengawasan terhadap kebijakan dan efektivitas penerapan tata kelola Bank, serta memberikan arahan dan rekomendasi perbaikan bila diperlukan.	Terpenuhi
The Board of Commissioners oversees the effectiveness of corporate governance policies and their implementation and proposes changes if necessary.	The Board of Commissioners, both directly and through relevant committees, continuously oversees the Bank's governance policies and effectiveness, and provides direction and recommendations for improvement when necessary.	Complied

Rekomendasi 1.3.7: **Recommendation 1.3.7:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memantau dan mengarahkan agar korporasi menerapkan manajemen risiko dan sistem pengendalian internal yang tepat dan efektif yang selaras dengan tujuan, sasaran, dan strategi korporasi serta mematuhi peraturan perundang-undangan, kode perilaku, dan standar yang berlaku. The Board of Commissioners monitors and directs the corporation to implement appropriate and effective risk management and internal control systems that are aligned with the corporate goals, objectives, and strategies, as well as complying with applicable laws and regulations, codes of conduct, and standards.	Dewan Komisaris secara aktif memantau dan mengawasi kegiatan Bank dengan memberikan arahan dan nasihat kepada Direksi melalui pertemuan rutin. Diskusi dalam pertemuan ini mencakup penerapan manajemen risiko dan SPI, guna memastikan kedua aspek tersebut dijalankan secara efektif sesuai prinsip GCG. The Board of Commissioners actively monitors and supervises the Bank's activities by providing direction and advice to the Board of Directors through regular meetings. Discussions at these meetings cover the implementation of risk management and SPI, to ensure both aspects are implemented effectively in accordance with GCG principles.	Terpenuhi Complied
Rekomendasi 1.3.8: **Recommendation 1.3.8:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mengawasi dan mengarahkan agar tercapai integritas akuntansi dan sistem pelaporan keuangan korporat, serta independensi fungsi audit internal dan eksternal. The Board of Commissioners supervises and directs the integrity of the corporate accounting and financial reporting system, as well as the independence of internal and external audit functions.	Dewan Komisaris telah melakukan diskusi dengan Direksi terkait penunjukan kantor akuntan publik untuk audit Laporan Keuangan Tahunan, sekaligus membahas rencana audit Bank. Langkah ini bertujuan memastikan integritas akuntansi, keandalan sistem pelaporan keuangan, serta menjaga independensi audit internal dan eksternal. The Board of Commissioners has discussed with Board of Directors regarding the appointment of public accounting firm to audit the Annual Financial Statements, as well as the Bank's audit plan. This step aims to ensure accounting integrity, financial reporting system reliability, and maintain the independence of internal and external audits.	Terpenuhi Complied
Rekomendasi 1.3.9: **Recommendation 1.3.9:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memantau, mengkaji ulang, dan menyetujui Laporan Tahunan dan Laporan Keberlanjutan korporasi serta memastikan integritasnya, serta mengawasi proses pengungkapan dan pengkomunikasian korporasi. The Board of Commissioners monitors, reviews, and approves the Annual Report and Sustainability Report of the corporation, ensures their integrity, and oversees the corporation's disclosure and communication process.	Dewan Komisaris secara aktif memantau dan menelaah penyusunan Laporan Tahunan Bank, termasuk memastikan penyajian informasi yang relevan mengenai Dewan Komisaris sesuai ketentuan yang berlaku. The Board of Commissioners actively monitors and reviews the preparation of the Bank's Annual Report, including ensuring the presentation of relevant information regarding the Board of Commissioners in accordance with applicable regulations.	Terpenuhi Complied
Rekomendasi 1.3.10: **Recommendation 1.3.10:**	**Keterangan:** **Description:**	**Status:**
Piagam Dewan Komisaris secara periodik ditinjau. The Board of Commissioners Charter is periodically reviewed.	*BOC Charter* ditinjau secara rutin dan terakhir diperbarui pada 6 Desember 2023. Dokumen ini telah dipublikasikan di situs web resmi Bank (www.victoriabank.co.id) untuk akses publik. BOC Charter is regularly reviewed and lastly updated on 6 December 2023. This document has been published on the Bank's official website (www.victoriabank.co.id) for public access.	Terpenuhi Complied
Rekomendasi 1.3.11: **Recommendation 1.3.11:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan dan terbukti melakukan kesalahan. The Board of Commissioners has a policy on resignation of members of the Board of Commissioners if involved in a financial crime and are proven to have made a mistake.	Dewan Komisaris memiliki *BOC Charter* yang memuat ketentuan pemberhentian anggota apabila terbukti melakukan pelanggaran atau terlibat dalam tindak kejahatan keuangan. The Board of Commissioners has BOC Charter that contains provisions for dismissing members if proven to have committed violations or been involved in financial crimes.	Terpenuhi Complied
Rekomendasi 1.3.12: **Recommendation 1.3.12:**	**Keterangan:** **Description:**	**Status:**
Komisaris independen sangat diharapkan untuk dapat berkontribusi dalam diskusi yang jujur, objektif, aktif, dan konstruktif pada rapat Dewan Komisaris.	Seluruh Komisaris Independen tidak memiliki keterkaitan keuangan, jabatan, kepemilikan saham, maupun hubungan keluarga dengan Direksi, Dewan Komisaris lain, Pemegang Saham Pengendali, atau pihak lain yang dapat memengaruhi independensi mereka. Hal ini menjamin objektivitas Komisaris Independen dalam melaksanakan tugas, sehingga mampu berperan aktif, objektif, dan konstruktif dalam fungsi pengawasan.	Terpenuhi

Independent commissioners are highly expected to be able to contribute to honest, objective, active, and constructive discussions at the Board of Commissioners' meetings.	All Independent Commissioners have no financial, positional, shareholding, or family relationships with the Board of Directors, other Board of Commissioners, Controlling Shareholders, or other parties that could affect their independence. This ensures the objectivity of Independent Commissioners in performing their duties, thus enabling them to play an active, objective, and constructive role in the supervisory function.	Complied
Rekomendasi 1.3.13: **Recommendation 1.3.13:**	**Keterangan:** **Description:**	**Status:**
Komisaris Utama berperan sebagai koordinator Dewan Komisaris dan memastikan efektivitasnya. Komisaris Utama mendorong budaya keterbukaan dan dialog konstruktif yang memungkinkan berbagai pandangan diungkapkan, termasuk mengoordinasi penetapan agenda rapat dewan yang tepat dan memastikan waktu yang cukup tersedia untuk mendiskusikan semua agenda. Selain itu, juga harus ada kesempatan bagi Dewan Komisaris untuk bertemu dengan jajaran Direksi dan Manajemen Senior.	Komisaris Utama telah melaksanakan tugasnya secara maksimal, termasuk sebagai koordinator Dewan Komisaris untuk memastikan efektivitas pelaksanaan fungsi pengawasan. Kepemimpinan Komisaris Utama terlihat dalam memimpin rapat sesuai agenda yang ditetapkan serta mendorong pengambilan keputusan secara kolegial.	Terpenuhi
The President Commissioner acts as the coordinator of the Board of Commissioners and ensures its effectiveness. The President Commissioner promotes a culture of transparency and constructive dialogue that allows a variety of views to be expressed, including coordinating the setting of appropriate board meeting agenda and ensuring sufficient time is available to discuss all agenda items. In addition, there should be opportunities for the Board of Commissioners to meet with the Board of Directors and Senior Management.	The President Commissioner has performed duties to the fullest extent, including as coordinator of the Board of Commissioners, ensuring the effective implementation of supervisory function. President Commissioner's leadership is evident in leading meetings according to the established agenda and encouraging collegial decision-making.	Complied
Rekomendasi 1.4: Pembentukan Komite. **Recommendation 1.4: Establishment of a Committee.**		
Rekomendasi 1.4.1: **Recommendation 1.4.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki komite-komite di bawah Dewan Komisaris sekurang-kurangnya terdiri dari: Komite Audit, Komite Remunerasi dan Nominasi, dan Komite Pemantau Manajemen Risiko.	Dewan Komisaris telah membentuk beberapa komite pendukung, yaitu Komite Pemantau Risiko, Komite Remunerasi dan Nominasi, serta Komite Audit, untuk membantu pelaksanaan fungsi pengawasan secara lebih efektif.	Terpenuhi
The Corporation has committees under the Board of Commissioners, consisting of at least: Audit Committee, Remuneration and Nomination Committee, and Risk Management Monitoring Committee.	Board of Commissioners has established several supporting committees, namely Risk Monitoring Committee, Remuneration and Nomination Committee, and Audit Committee, to help carry out supervisory function more effectively.	Complied
Rekomendasi 1.4.2: **Recommendation 1.4.2:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memastikan bahwa anggota Komite Audit seluruhnya independen dan komite lain yang dibentuk Dewan Komisaris adalah mayoritas dari pihak independen, serta semua anggota komite memiliki kompetensi, berkomitmen, serta memiliki wewenang yang memadai untuk menjalankan perannya secara efektif dan independen.	Dewan Komisaris memastikan seluruh anggota Komite Audit terdiri dari Komisaris Independen dan pihak independen (non-komisaris) yang memiliki kompetensi sesuai kebutuhan pelaksanaan tugas. Pelaksanaan tugas Komite Audit dilakukan secara efektif dan independen untuk mendukung pengawasan yang optimal.	Terpenuhi
The Board of Commissioners ensures that all Audit Committee's members are independent, and majority of members of other committees established by the Board of Commissioners are independent parties, and that all committee members are competent, committed, and have sufficient authority to perform their roles in an effective and independent manner.	The Board of Commissioners ensures that all members of Audit Committee consist of Independent Commissioners and independent parties (non-commissioners) with competencies needed to carry out duties. Audit Committee's duties are carried out effectively and independently to support optimal oversight.	Complied
Rekomendasi 1.4.3: **Recommendation 1.4.3:**	**Keterangan:** **Description:**	**Status:**
Untuk memastikan pemantauan atas pelaksanaan tugas Komite Audit berjalan objektif dan independen, Komisaris Utama tidak boleh menjadi ketua Komite Audit, kecuali dalam keadaan luar biasa yang harus dijelaskan dalam Laporan Tahunan.	Jabatan Ketua Komite Audit dipegang oleh Zaenal Abidin, Ph.D, yang juga menjabat sebagai Komisaris Utama Independen. Bank memastikan independensi beliau tetap terjaga dalam melaksanakan tugas dan tanggung jawab sebagai Ketua Komite Audit.	Penjelasan
To ensure objective and independent monitoring on the implementation of Audit Committee's duties, the President Commissioner is not allowed to be the chairman of Audit Committee, except in exceptional circumstances which must be explained in the Annual Report.	The position of Chairman of Audit Committee is held by Zaenal Abidin, Ph.D, who also serves as Independent President Commissioner. The Bank ensures that his independence is maintained in performing his duties and responsibilities as Chairman of the Audit Committee.	Explanation

Rekomendasi 1.5: Penilaian Kinerja – Dewan Komisaris dan Anggotanya.
Recommendation 1.5: Performance Assessment – Board of Commissioners and its Members.

Rekomendasi 1.5.1: Recommendation 1.5.1:	Keterangan: Description:	Status:
Dewan Komisaris melakukan evaluasi formal tahunan secara objektif untuk menentukan efektivitas Dewan, komitenya, dan setiap individu Komisaris.	Penilaian kinerja Dewan Komisaris beserta komite-komitenya dilaksanakan secara tahunan minimal sekali dalam setahun, dengan menggunakan kriteria tertentu yang dijabarkan dalam Laporan Tahunan ini.	Terpenuhi
The Board of Commissioners conducts an annual formal evaluation objectively to determine the effectiveness of the Board, its committees, and each individual Commissioner.	The performance assessments of the Board of Commissioners and its committees are carried out at least once a year, by using specific criteria outlined in this Annual Report.	Complied

Rekomendasi 1.6: Benturan Kepentingan.
Recommendation 1.6: Conflict of Interest.

Rekomendasi 1.6.1: Recommendation 1.6.1:	Keterangan: Description:	Status:
Anggota Direksi yang mempunyai rangkap jabatan di luar korporasi, harus mendapatkan persetujuan dari Dewan Komisaris. Seorang Komisaris memberi tahu Dewan Komisaris dan ketua komite yang menjalankan fungsi nominasi, sebelum menerima penunjukan baru sebagai Direktur atau Komisaris dari korporasi terbuka, jabatan Direktur lainnya atau posisi lain dengan komitmen waktu yang signifikan.	Seluruh anggota Direksi Bank tidak menjabat di posisi lain secara bersamaan.	Terpenuhi
Members of the Board of Directors with concurrent positions outside the corporation must obtain approval from the Board of Commissioners. A Commissioner shall notify the Board of Commissioners and the chairman of committee performing nominating function, prior to accepting a new appointment as Director or Commissioner of a publicly listed corporation, other Director positions, or other positions with a significant time commitment.	All members of the Bank's Board of Directors do not hold other positions concurrently.	Complied
Rekomendasi 1.6.2: **Recommendation 1.6.2:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memantau dan mengelola potensi benturan kepentingan manajemen, anggota Direksi, Dewan Komisaris dan Pemegang Saham, termasuk penyalahgunaan aset korporasi dan penyalahgunaan dalam transaksi pihak berelasi. Komisaris yang memiliki benturan kepentingan tidak turut serta dalam pemantauan dan pengambilan keputusan atas potensi benturan kepentingan yang melibatkan Komisaris atau afiliasi Komisaris yang bersangkutan.	Dewan Komisaris secara aktif memantau dan mengelola potensi benturan kepentingan di Bank. Seluruh anggota berkomitmen untuk menghindari situasi yang dapat menimbulkan benturan kepentingan, sebagaimana diatur dalam *BOC Charter*. Jika terjadi benturan kepentingan, anggota dilarang mengambil tindakan yang merugikan Bank dan wajib mengungkapkan potensi benturan tersebut dalam setiap pengambilan keputusan.	Terpenuhi
The Board of Commissioners monitors and manages potential conflicts of interest within the management, members of the Board of Directors, Board of Commissioners, and Shareholders, including misuse of corporate assets and misuse of related party transactions. Commissioners with conflicts of interest shall not participate in monitoring and making decisions on matters containing potential conflicts of interest involving the Commissioners or affiliates of the Commissioner concerned.	The Board of Commissioners actively monitors and manages potential conflicts of interest within the Bank. All members are committed to avoiding situations that could give rise to a conflict of interest, as stipulated in BOC Charter. In the event of a conflict of interest, members are prohibited from taking actions detrimental to the Bank and are required to disclose such potential conflicts in all decision-making processes.	Complied

Rekomendasi 1.7: Peningkatan Kompetensi Anggota Direksi dan Dewan Komisaris.
Recommendation 1.7: Competency Improvement of Members of the Board of Directors and Board of Commissioners.

Rekomendasi 1.7.1: Recommendation 1.7.1:	Keterangan: Description:	Status:
Dewan Komisaris memastikan bahwa anggota Direksi dan Dewan Komisaris memahami peran dan tanggung jawab mereka, karakteristik dan operasi korporasi, peraturan perundang-undangan dan standar yang relevan serta kewajiban lain yang berlaku. Direksi melalui Sekretaris Korporasi mendukung semua anggota Direksi dan Dewan Komisaris dalam memperbarui dan menyegarkan keterampilan dan pengetahuan mereka yang diperlukan untuk menjalankan peran mereka di Dewan.	Sebelum menjalankan tugas dan fungsinya, Dewan Komisaris dan Direksi mengikuti program induksi untuk memastikan pemahaman menyeluruh atas tanggung jawab masing-masing sesuai ketentuan regulasi. Secara berkala, Dewan Komisaris dan Direksi juga mengikuti program pengembangan kompetensi guna memperbarui dan meningkatkan keterampilan serta pengetahuan yang mendukung pelaksanaan peran secara efektif.	Terpenuhi
The Board of Commissioners ensures that members of the Board of Directors and Board of Commissioners understand their roles and responsibilities, characteristics and operations of the corporation, relevant laws and regulations, and other applicable standards and obligations. The Board of Directors, through the Corporate Secretary, supports all members of the Board of Directors and Board of Commissioners in updating and refreshing the required skills and knowledge to perform their roles on the Board.	Before carrying out their duties and functions, the Board of Commissioners and Board of Directors attend an induction program to ensure a thorough understanding of their respective responsibilities in accordance with regulatory requirements. The Board of Commissioners and Board of Directors also periodically attend competency development programs to update and enhance their skills and knowledge that support the effective implementation of their roles.	Complied

Prinsip 2: Komposisi dan Remunerasi Direksi dan Dewan Komisaris
Principle 2: Composition and Remuneration of the Board of Directors and Board of Commissioners

Rekomendasi 2.1: Komposisi Direksi dan Dewan Komisaris.
Recommendation 2.1: Composition of the Board of Directors and Board of Commissioners.

Rekomendasi 2.1.1: **Recommendation 2.1.1:**	**Keterangan:** **Description:**	**Status:**
Dalam menentukan kandidat calon Direktur, Dewan Komisaris melalui Komite Remunerasi dan Nominasi tidak hanya mengandalkan rekomendasi dari Dewan Komisaris, manajemen atau Pemegang Saham mayoritas. Dewan Komisaris melalui Komite Remunerasi dan Nominasi dapat menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat. In determining Director candidates, the Board of Commissioners, through the Remuneration and Nomination Committee, does not rely solely on recommendations from the Board of Commissioners, management, or majority shareholders. The Board of Commissioners, through the Remuneration and Nomination Committee, may use independent sources to determine qualified candidates.	Bank saat ini belum melibatkan pihak ketiga independen dalam proses seleksi calon Dewan Komisaris. Meski demikian, Bank tetap memastikan bahwa penunjukan kandidat Direksi dan Dewan Komisaris dilakukan sesuai peraturan yang berlaku serta memenuhi kualifikasi yang dibutuhkan. The Bank currently does not involve independent third parties in the selection process for candidates for the Board of Commissioners. Nevertheless, the Bank ensures that the appointment of candidates for the Board of Directors and Board of Commissioners is carried out in accordance with applicable regulations and meets the required qualifications.	Penjelasan Explanation
Rekomendasi 2.1.2: **Recommendation 2.1.2:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memastikan bahwa kriteria dalam menyeleksi anggota Direksi mencakup paling tidak pengetahuan, kemampuan, dan keahlian yang dibutuhkan untuk memenuhi secara tepat peran Direksi serta memperhatikan terpenuhinya keberagaman Direksi. The Board of Commissioners ensures that the criteria for selecting members of the Board of Directors include at least the required knowledge, abilities, and expertise to properly meet the role of the Board of Directors and pay attention to the fulfillment of the Board of Directors' diversity.	Dewan Komisaris, melalui Komite Remunerasi dan Nominasi, melakukan seleksi kandidat Direksi berdasarkan kriteria yang telah ditetapkan untuk memastikan kesesuaian dengan kebutuhan Bank. The Board of Commissioners, through the Remuneration and Nomination Committee, selects candidates for the Board of Directors based on the established criteria to ensure they meet the Bank's needs.	Terpenuhi Complied
Rekomendasi 2.1.3: **Recommendation 2.1.3:**	**Keterangan:** **Description:**	**Status:**
Kebijakan korporasi tentang keberagaman pada, Direksi dan Dewan Komisaris diungkapkan dalam Laporan Tahunan. The corporate policy on diversity in the Board of Directors and Board of Commissioners is disclosed in the Annual Report.	Kebijakan terkait keberagaman anggota Dewan Komisaris dan Direksi Bank disampaikan secara transparan dalam Laporan Tahunan ini. The Bank's policies regarding diversity in the Board of Commissioners and Board of Directors are transparently communicated in this Annual Report.	Terpenuhi Complied
Rekomendasi 2.1.4: **Recommendation 2.1.4:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris memastikan bahwa kebijakan dan prosedur untuk seleksi dan nominasi Komisaris adalah jelas dan transparan sehingga dapat menghasilkan komposisi Dewan yang diinginkan. Dewan Komisaris menggunakan sumber independen untuk menentukan kandidat yang memenuhi syarat. The Board of Commissioners ensures that the policies and procedures for the selection and nomination of Commissioners are clear and transparent so as to produce the desired Board composition. The Board of Commissioners uses independent sources to determine qualified candidates.	Dewan Komisaris, bersama Komite Remunerasi dan Nominasi, melaksanakan fungsi pengawasan untuk memastikan proses nominasi dan remunerasi di Bank berjalan transparan dan tepat. Langkah ini bertujuan menjaga kepentingan Bank sekaligus mendukung praktik tata kelola yang adil dan berintegritas dalam pengelolaan HC. The Board of Commissioners, together with the Remuneration and Nomination Committee, performs supervisory function to ensure the Bank's nomination and remuneration processes are transparent and appropriate. This measure aims to safeguard the Bank's interests while supporting fair and consistent governance practices in HC management.	Terpenuhi Complied
Rekomendasi 2.1.5: **Recommendation 2.1.5:**	**Keterangan:** **Description:**	**Status:**
Dewan Komisaris/Komite yang menjalankan fungsi nominasi menetapkan prosedur dan kriteria nominasi yang konsisten dengan matriks keahlian Dewan Komisaris yang telah disetujui Dewan Komisaris dan memastikan bahwa profil kandidat memenuhi persyaratan yang ditetapkan dalam matriks keahlian dan kriteria nominasi. The Board of Commissioners/Committee that performs the nomination function establishes nomination procedures and criteria, which are consistent with the Board of Commissioners' expertise matrix, which has been approved by the Board of Commissioners, and ensures that the candidate profile meets the established requirements in the expertise matrix and nomination criteria.	Komite Remunerasi dan Nominasi melaksanakan fungsi nominasi sesuai prosedur dan kriteria yang tercantum dalam Pedoman dan Tata Tertib Komite No. 001/SK-KOM/01/24 tanggal 5 Januari 2024, serta Kebijakan Penerapan Tata Kelola Remunerasi No. 011/SK-KOM/01/24 tanggal 17 Januari 2024, yang telah mendapatkan persetujuan Dewan Komisaris. The Remuneration and Nomination Committee carries out its nomination function in accordance with the procedures and criteria set out in the Committee's Charter No. 001/SK-KOM/01/24 dated 5 January 2024 and the Remuneration Governance Implementation Policy No. 011/SK-KOM/01/24 dated 17 January 2024, which have been approved by the Board of Commissioners.	Terpenuhi Complied

Rekomendasi 2.1.6: Recommendation 2.1.6:	Keterangan: Description:	Status:
Komposisi Dewan Komisaris harus dibentuk sedemikian rupa sehingga anggota-anggotanya secara kelompok mencerminkan keberagaman dalam hal kemampuan, keahlian, pengetahuan, pengalaman, usia, latar belakang budaya, dan gender yang dibutuhkan untuk memenuhi secara tepat peran Dewan Komisaris. The Board of Commissioners' composition must be formed in such a way that its members as a group reflect the diversity in terms of abilities, skills, knowledge, experience, age, cultural background, and gender required to properly fulfill the roles of the Board of Commissioners.	Bank menerapkan prinsip keberagaman dalam komposisi Dewan Komisaris sesuai arahan Otoritas Jasa Keuangan, sebagaimana diatur dalam Lampiran Surat Edaran Otoritas Jasa Keuangan No. 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka, untuk mendukung pengambilan keputusan yang inklusif dan efektif. The Bank implements the principle of diversity in the composition of the Board of Commissioners in accordance with Financial Services Authority direction, as stipulated in the Attachment to the Financial Services Authority Circular No. 32/SEOJK.04/2015 on Guidelines for Public Company's Governance, to support inclusive and effective decision-making.	Terpenuhi Complied
Rekomendasi 2.1.7: **Recommendation 2.1.7:**	**Keterangan:** **Description:**	**Status:**
Untuk memampukan Dewan Komisaris dalam memberikan advis dan supervisi secara independen kepada Direksi dan untuk peran-peran yang terdapat potensi benturan kepentingan, Dewan Komisaris terdiri dari Komisaris Independen yang cukup jumlahnya, dengan masa jabatan yang dibatasi dan terdapat pengungkapan jangka waktu keanggotaan Dewan Komisaris serta independensi mereka dari sudut pandang korporasi. To enable the Board of Commissioners to provide independent advice and supervision to the Board of Directors and for roles with potential conflicts of interest, the Board of Commissioners shall consist of a sufficient number of Independent Commissioners, with a limited term of office and disclosure of the term of office of the Board of Commissioners and their independence from a corporate perspective.	Dewan Komisaris memiliki jumlah Komisaris Independen sesuai ketentuan peraturan perundang-undangan yang berlaku. Rincian informasi mengenai hal ini disajikan secara lengkap dalam Laporan Tahunan Bank. The Board of Commissioners has a number of Independent Commissioners in accordance with applicable laws and regulations. Detailed information regarding this matter is fully presented in the Bank's Annual Report.	Terpenuhi Complied
Rekomendasi 2.1.8: **Recommendation 2.1.8:**	**Keterangan:** **Description:**	**Status:**
Untuk memfasilitasi fungsi Direksi dan Dewan Komisaris yang efektif dan guna meningkatkan kepercayaan investor dan pemangku kepentingan, Komite Remunerasi dan Nominasi memastikan bahwa terdapat proses yang formal, ketat, dan transparan untuk penunjukan dan pengangkatan anggota Direksi dan Dewan Komisaris. To facilitate effective function of the Board of Directors and Board of Commissioners and to increase investors and stakeholders trust, the Remuneration and Nomination Committee ensures that there is a formal, rigorous, and transparent process for the selection and appointment of members of the Board of Directors and Board of Commissioners.	Komite Remunerasi dan Nominasi melaksanakan tanggung jawabnya untuk memastikan proses nominasi dan pemberian remunerasi di Bank berlangsung secara tepat, transparan, dan sesuai kepentingan Bank. Pelaksanaan fungsi ini dijabarkan secara rinci dalam Laporan Tahunan. The Remuneration and Nomination Committee carries out its responsibilities to ensure that the Bank's nomination and remuneration processes are conducted appropriately, transparently, and in accordance with the Bank's interests. The implementation of this function is detailed in the Annual Report.	Terpenuhi Complied

Rekomendasi 2.2: Remunerasi Direksi dan Dewan Komisaris.
Recommendation 2.2: Remuneration of the Board of Directors and Board of Commissioners.

Rekomendasi 2.2.1: Recommendation 2.2.1:	Keterangan: Description:	Status:
Kebijakan remunerasi anggota Direksi terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Remunerasi Direksi harus diusulkan, dapat dengan melalui Komite Remunerasi dan Nominasi, oleh Dewan Komisaris untuk diputuskan oleh RUPS. Jumlah remunerasi yang diusulkan kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Direksi dan situasi ekonomi serta kinerja korporasi. The remuneration policy for the Board of Directors' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The Board of Directors' remuneration must be proposed, possibly through the Remuneration and Nomination Committee, by the Board of Commissioners to be resolved by the GMS. The remuneration amount proposed to the GMS is determined by considering the role of each member of the Board of Directors, the economic situation, and the corporate performance.	Bank menetapkan dan menerapkan Kebijakan Tata Kelola Remunerasi melalui Keputusan Direksi No. 011/SK-DIR/01/24 tanggal 17 Januari 2024. Kebijakan ini dirancang untuk menjamin sistem remunerasi yang kompetitif, adil, dan seimbang, sesuai peraturan perundang-undangan, serta ditinjau secara berkala untuk menjaga relevansi dan efektivitasnya. The Bank establishes and implements Remuneration Governance Policy through the Board of Directors' Decision No. 011/SK-DIR/01/24 dated 17 January 2024. This policy is designed to ensure a competitive, fair, and balanced remuneration system, in accordance with laws and regulations, and is periodically reviewed to maintain its relevance and effectiveness.	Terpenuhi Complied

Rekomendasi 2.2.2: Recommendation 2.2.2:	Keterangan: Description:	Status:
Kebijakan remunerasi anggota Dewan Komisaris terdiri atas struktur remunerasi yang berorientasi pada pengembangan korporasi yang berkelanjutan dan mendorong pencapaian tujuan jangka panjang. Jumlah remunerasi yang diusulkan Dewan Komisaris kepada RUPS tersebut ditetapkan dengan mempertimbangkan peran setiap anggota Dewan Komisaris dan situasi ekonomi serta kinerja korporasi. Di samping itu juga harus dipertimbangkan posisinya sebagai Komisaris Utama dan ketua serta keanggotaannya dalam komite-komite.	Bank menetapkan struktur, kebijakan, dan besaran remunerasi bagi setiap anggota Dewan Komisaris dengan mempertimbangkan tanggung jawab, wewenang, tugas, dan kinerja masing-masing. Penetapan ini juga memperhatikan standar remunerasi di industri sejenis serta kapasitas keuangan Bank.	Terpenuhi
The remuneration policy for the Board of Commissioners' members consists of a remuneration structure that is oriented towards sustainable corporate development and encourages the achievement of long-term goals. The remuneration amount proposed by the Board of Commissioners to the GMS is determined by considering the role of each member of the Board of Commissioners, the economic situation, and the corporate performance. In addition, it must also consider his/her position as President Commissioner and chairman as well as membership in committees.	The Bank establishes the structure, policies, and remuneration amount for each member of the Board of Commissioners, by considering respective responsibilities, authorities, duties, and performance. This determination also considers remuneration standards in similar industries and the Bank's financial capacity.	Complied

Rekomendasi 2.2.3: Recommendation 2.2.3:	Keterangan: Description:	Status:
Untuk memastikan bahwa paket remunerasi ditentukan berdasarkan prestasi, kualifikasi, dan kompetensi Direktur dan Komisaris dengan memperhatikan kinerja operasi korporasi, kinerja individu dan kondisi pasar, Komite Remunerasi dan Nominasi memastikan bahwa terdapat prosedur yang adil dan transparan untuk menetapkan kebijakan remunerasi anggota Direksi dan Dewan Komisaris.	Komite Remunerasi dan Nominasi meninjau dan membahas remunerasi Dewan Komisaris dengan memperhitungkan skala dan kompleksitas usaha, perbandingan dengan *peer group*, inflasi, serta kondisi dan kapasitas keuangan Bank, sesuai ketentuan peraturan yang berlaku. Keputusan akhir mengenai remunerasi Dewan Komisaris dan Direksi ditetapkan melalui RUPS.	Terpenuhi
To ensure that the remuneration package is determined based on the achievements, qualifications, and competencies of the Directors and Commissioners by considering the corporate operational performance, individual performance, and market conditions, the Remuneration and Nomination Committee ensures that there are fair and transparent procedures for establishing remuneration policies for members of the Board of Directors and Board of Commissioners.	The Remuneration and Nomination Committee reviews and discusses remuneration of the Board of Commissioners, by considering business scale and complexity, comparison with peer groups, inflation, and the Bank's financial condition and capacity, in line with applicable laws and regulations. The final decision regarding remuneration of the Board of Commissioners and Board of Directors is determined through the GMS.	Complied

Prinsip 3: Hubungan Kerja Antara Direksi dan Dewan Komisaris
Principle 3: Working Relationship Between the Board of Directors and Board of Commissioners

Rekomendasi 3.1: Sifat Hubungan Kerja.
Recommendation 3.1: Nature of Working Relationship.

Rekomendasi 3.1.1: Recommendation 3.1.1:	Keterangan: Description:	Status:
Terdapat diskusi yang terbuka antara Direksi dengan Dewan Komisaris serta di antara para anggota Direksi dan para anggota Dewan Komisaris. Namun, tetap penting menjaga kerahasiaan informasi agar tidak terjadi kebocoran informasi rahasia.	Dewan Komisaris dan Direksi bekerja secara kolaboratif dalam merumuskan visi, misi, dan strategi Bank melalui rapat resmi serta forum diskusi dan pertemuan lainnya.	Terpenuhi
There are open discussions between the Board of Directors and the Board of Commissioners as well as among members of the Board of Directors and members of the Board of Commissioners. However, it remains important to maintain the confidentiality of information to avoid leakage of confidential information.	The Board of Commissioners and Board of Directors work collaboratively to formulate the Bank's vision, mission, and strategy through formal meetings, discussion forums, and other meetings.	Complied

Rekomendasi 3.1.2: Recommendation 3.1.2:	Keterangan: Description:	Status:
Sesuai dengan tugas dan perannya masing-masing, Direksi bekerja sama dengan Dewan Komisaris dalam merumuskan misi, visi dan strategi korporasi dan secara reguler membahas pengimplementasiannya.	Bank secara konsisten menyusun strategi dan kebijakan jangka pendek maupun menengah dalam RBB yang selaras dengan visi dan misi perusahaan. Untuk memastikan efektivitasnya, Direksi bersama Dewan Komisaris serta manajemen senior secara berkala melakukan peninjauan dan evaluasi menyeluruh terhadap strategi, kebijakan, serta pelaksanaannya di seluruh tingkatan organisasi.	Terpenuhi
In accordance with their respective duties and roles, members of the Board of Directors cooperate with those of the Board of Commissioners in formulating corporate missions, visions, and strategies, and regularly discuss their implementation.	The Bank consistently develops short- and medium-term strategies and policies within RBB that are in line with the Company's vision and mission. To ensure their effectiveness, the Board of Directors, along with Board of Commissioners and senior management, regularly conducts comprehensive review and evaluation of strategies, policies, and their implementation at all levels of the organization.	Complied

Rekomendasi 3.1.3: Recommendation 3.1.3:	Keterangan: Description:	Status:
Sekretaris Korporasi memiliki peran penting dalam mendukung efektivitas hubungan kerja antara Direksi dengan Dewan Komisaris, mendorong implementasi praktik governansi korporat yang baik, termasuk komunikasi yang efektif dengan Pemegang Saham dan pemangku kepentingan lainnya. The Corporate Secretary has a crucial role in supporting the effectiveness of working relationship between the Board of Directors and the Board of Commissioners, encouraging the implementation of good corporate governance practices, including effective communication with Shareholders and other stakeholders.	Sebagai Kepala Divisi *Corporate Secretary*, Caprie Ardira Azhar berperan penting dalam memperkuat koordinasi antara Direksi dan Dewan Komisaris. Selain itu, beliau juga berkontribusi aktif dalam mendorong penerapan prinsip GCG, khususnya melalui pengelolaan komunikasi yang efektif dengan Pemegang Saham dan berbagai pemangku kepentingan. As the Head of Corporate Secretary Division, Mr. Caprie Ardira Azhar plays a key role in strengthening coordination between the Board of Directors and Board of Commissioners. Furthermore, he actively contributes to promoting GCG principles implementation, particularly through effective communication with Shareholders and various stakeholders.	Terpenuhi Complied

Rekomendasi 3.2: Akses informasi Dewan Komisaris.
Recommendation 3.2: Access to Information for the Board of Commissioners.

Rekomendasi 3.2.1: Recommendation 3.2.1:	Keterangan: Description:	Status:
Direksi bertanggung jawab untuk memastikan Dewan Komisaris mendapatkan akses informasi yang akurat, relevan, dan tepat waktu. Dewan Komisaris sendiri memastikan bahwa ia memperoleh informasi yang memadai. Direksi menyediakan informasi kepada Dewan Komisaris secara teratur, tanpa penundaan, dan secara komprehensif tentang semua masalah yang relevan dengan korporasi. Dewan Komisaris sewaktu-waktu dapat meminta Direksi untuk memberikan informasi tambahan. The Board of Directors is responsible for ensuring that the Board of Commissioners has access to accurate, relevant, and timely information. The Board of Commissioners itself ensures that it obtains adequate information. The Board of Directors provides information to the Board of Commissioners regularly, without delay, and comprehensively on all matters relevant to the corporation. The Board of Commissioners may at any time request additional information to the Board of Directors.	Direksi berkomitmen mendukung peran pengawasan Dewan Komisaris dengan menyediakan akses informasi yang lengkap, relevan, dan tepat waktu. Ketentuan dalam Anggaran Dasar serta kebijakan internal Bank juga menjamin hak Dewan Komisaris untuk memperoleh informasi, termasuk meminta data tambahan dari Direksi apabila diperlukan guna memperkuat efektivitas pengawasan. The Board of Directors is committed to supporting the Board of Commissioners' supervisory role by providing access to complete, relevant, and timely information. Provisions in the Bank's Articles of Association and internal policies also guarantee the Board of Commissioners' rights to obtain information, including requesting additional data from the Board of Directors if necessary to strengthen oversight effectiveness.	Terpenuhi Complied

Rekomendasi 3.3: Tanggung Jawab Direksi dan Dewan Komisaris Atas Dampak Struktur.
Recommendation 3.3: Responsibilities of the Board of Directors and Board of Commissioners on Impacts of the Structure.

Rekomendasi 3.3.1: Recommendation 3.3.1:	Keterangan: Description:	Status:
Dampak struktur kepemilikan terhadap korporasi. Direksi dan Dewan Komisaris mempertimbangkan tanggung jawabnya dalam konteks struktur kepemilikan saham dan hubungan antar-Pemegang Saham korporasi yang mungkin berdampak terhadap pengelolaan dan operasi korporasi. The impact of ownership structure on the corporation. The Board of Directors and Board of Commissioners consider their responsibilities in the context of shareholding structure and relationships between corporate Shareholders, which may have an impact on corporate management and operations.	Dalam menjalankan peran dan kewenangannya, Dewan Komisaris serta Direksi Bank senantiasa menunaikan tugas dan tanggung jawab dengan menjunjung tinggi prinsip independensi serta menjaga objektivitas dalam setiap pengambilan keputusan. In carrying out roles and authorities, the Board of Commissioners and Board of Directors consistently fulfill their duties and responsibilities by upholding the principle of independence and maintaining objectivity in all decision-making.	Terpenuhi Complied

Prinsip 4: Perilaku Etis dan Bertanggung Jawab
Principle 4: Ethical and Responsible Conduct

Rekomendasi 4.1: Pedoman Etika dan Perilaku.
Recommendation 4.1: Code of Conduct.

Rekomendasi 4.1.1: Recommendation 4.1.1:	Keterangan: Description:	Status:
Pernyataan ini dituangkan dalam Pedoman Perilaku dan Etika Usaha yang harus secara jelas mengungkapkan harapan korporasi bahwa setiap anggota Direksi dan Dewan Komisaris serta karyawan akan: 1. Bertindak untuk kepentingan terbaik korporasi. 2. Bertindak dengan jujur dan dengan integritas berstandar tinggi. 3. Bersikap independen dan bertindak berdasarkan informasi yang lengkap, dengan iktikad baik, dengan uji tuntas dan kehati-hatian. 4. Mematuhi peraturan perundang-undangan yang berlaku bagi korporasi dan operasinya. 5. Menghindari tindakan yang melanggar peraturan perundang-undangan atau tindakan yang tidak etis berdasarkan pedoman etika korporasi. 6. Tidak terlibat atau berpartisipasi dalam kegiatan apa pun yang akan menimbulkan benturan kepentingan dengan kepentingan terbaik korporasi atau yang akan berdampak negatif terhadap reputasi korporasi. 7. Tidak mengambil manfaat atas properti atau informasi yang dimiliki korporasi, kepemilikan aset lainnya atau pelanggannya untuk kepentingan pribadi atau yang menyebabkan kerugian bagi korporasi dan pelanggannya. 8. Tidak memanfaatkan jabatannya atau peluang yang dihasilkan oleh jabatannya untuk kepentingan pribadi. 9. Menghindari perbuatan meminta atau menerima dari pihak ketiga pembayaran, gratifikasi atau keuntungan lain untuk dirinya sendiri atau untuk orang lain yang menimbulkan benturan kepentingan/memberikan keuntungan kepada pihak ketiga secara melanggar peraturan perundang-undangan. 10. Menghormati perbedaan pendapat dan hak-hak setiap anggota Direksi, Dewan Komisaris, dan karyawan. 11. Memastikan pengungkapan yang lengkap, adil, akurat, tepat waktu, dan dapat dipahami dalam laporan dan dokumen yang disampaikan korporasi kepada regulator dan dalam komunikasi publik lainnya.	Sebagai wujud komitmen terhadap integritas dan tata kelola yang baik, Bank telah menetapkan Pedoman Kode Etik Perilaku Karyawan serta kebijakan penerapan strategi anti-fraud. Seluruh ketentuan tersebut menjadi acuan bagi setiap insan Bank dalam melaksanakan tugas dan tanggung jawabnya. Penjelasan lebih rinci mengenai kebijakan tersebut dapat ditemukan dalam Laporan Tahunan ini.	Terpenuhi
This statement is set out in the Code of Conduct and Business Ethics, which must clearly state the corporate expectation that each member of the Board of Directors and Board of Commissioners and employees will: 1. Act in the best interests of the corporation. 2. Act honestly and with a high standard of integrity. 3. Be independent and act based on complete information, in good faith, with due diligence and prudence. 4. Comply with laws and regulations that apply to the corporation and its operations. 5. Avoid actions that violate laws and regulations or unethical actions based on corporate ethics guidelines. 6. Not be involved or participate in any activity that will create a conflict of interest with the corporation's best interests or have a negative impact on the corporation's reputation. 7. Not take advantage of property or information owned by the corporation, ownership of other assets or its customers, for personal gain or which causes harm to the corporation and its customers. 8. Not take advantage of the position or opportunities generated by the position for personal gain. 9. Avoid the act of requesting or receiving from third parties payments, gratuities, or other benefits for oneself or for other people that will lead to conflicts of interest/provide benefits to third parties by violating the laws and regulations. 10. Respect differences of opinion and the rights of each member of the Board of Directors, Board of Commissioners, and employees. 11. Ensure complete, fair, accurate, timely, and understandable disclosure in reports and documents submitted by the corporation to regulators and in other public communications.	As the manifestation of its commitment to integrity and good governance, the Bank has established Employee's Code of Conduct and anti-fraud strategy implementation policy. All of such provisions serve as a reference for every Bank personnel in performing duties and responsibilities. A more detailed explanation of these policies can be found in this Annual Report.	Complied

Rekomendasi 4.1.2: Recommendation 4.1.2:	Keterangan: Description:	Status:
Direksi menetapkan kebijakan dan praktik anti-pencucian uang dan pendanaan terorisme, anti-suap, anti-korupsi, anti-kecurangan (*anti-fraud*), keterlibatan dalam politik dengan mengacu pada standar nasional atau internasional mengenai anti-pencucian uang, anti-suap, anti-korupsi, anti-kecurangan, atau standar terkait lainnya.	Untuk memperkuat budaya integritas dan menjaga kepercayaan pemangku kepentingan, Bank menetapkan Pedoman Kode Etik Perilaku Karyawan serta Kebijakan Strategi Anti-*Fraud* sebagai landasan dalam setiap aktivitas operasional. Kedua kebijakan tersebut menjadi acuan wajib bagi seluruh insan Bank dalam bertindak profesional dan menjunjung tinggi prinsip GCG. Uraian lebih lanjut mengenai implementasi kebijakan ini disajikan dalam Laporan Tahunan ini.	Terpenuhi
The Board of Directors establishes policies and practices for anti-money laundering and terrorist financing, anti-bribery, anti-corruption, anti-fraud, political involvement with reference to the national or international standards regarding anti-money laundering, anti-bribery, anti-corruption, anti-fraud, or other related standards.	To strengthen a culture of integrity and maintain stakeholder trust, the Bank has established Employee's Code of Conduct and Anti-Fraud Strategy Policy as the basis for all operational activities. The two policies serve as mandatory guidelines for all Bank personnel to act professionally and uphold GCG principles. Further details on the implementation of these policies are presented in this Annual Report.	Complied

Rekomendasi 4.2: Nilai–Nilai dan Budaya Organisasi.
Recommendation 4.2: Corporate Values and Culture.

Rekomendasi 4.2.1: Recommendation 4.2.1:	Keterangan: Description:	Status:
Korporasi mengartikulasikan, menumbuhkan, dan mengungkapkan budaya serta nilai-nilai korporasi.	Bank menjadikan SQEW sebagai nilai fundamental yang wajib dijalankan oleh seluruh insan dalam setiap aktivitas kerja. Nilai tersebut diinternalisasikan melalui beragam program dan inisiatif yang dirancang secara berkesinambungan, disertai evaluasi rutin untuk memastikan penerapannya berlangsung konsisten dan efektif di seluruh lini organisasi.	Terpenuhi
The corporation articulates, fosters, and discloses corporate culture and values.	The Bank has made SQEW a fundamental value that must be implemented by all personnel in all work activities. These values are internalized through various programs and initiatives designed on an ongoing basis, accompanied by regular evaluations to ensure consistent and effective implementation across the organization.	Complied

Rekomendasi 4.3: Penegakan dan Komunikasi Pedoman Etika, Nilai-Nilai, dan Budaya.
Recommendation 4.3: Enforcement and Communication of the Code of Conduct, Values, and Culture.

Rekomendasi 4.3.1: Recommendation 4.3.1:	Keterangan: Description:	Status:
Pedoman perilaku dan kode etik korporasi dikomunikasikan secara efektif kepada Direksi, Dewan Komisaris, serta seluruh karyawan, diintegrasikan ke dalam strategi dan operasi korporasi termasuk sistem manajemen risiko dan struktur remunerasi, serta ditegakkan.	Direksi berkomitmen menanamkan nilai-nilai Kode Etik sebagai bagian dari pembentukan budaya kerja yang berintegritas. Proses internalisasi tersebut diterapkan secara terstruktur dalam strategi bisnis maupun operasional Bank, serta diintegrasikan ke dalam mekanisme manajemen risiko dan kebijakan remunerasi.	Terpenuhi
The corporate code of conduct and code of ethics are communicated effectively to the Board of Directors, Board of Commissioners, and all employees, integrated into corporate strategy and operations, including risk management system and remuneration structure, and being enforced.	The Board of Directors is committed to instilling the values of Code of Conduct as part of establishing a work culture of integrity. This internalization process is implemented in a structured manner within the Bank's business and operational strategies, and integrated into risk management mechanism and remuneration policies.	Complied

Prinsip 5: Manajemen Risiko, Pengendalian Internal, dan Kepatuhan
Principle 5: Risk Management, Internal Control, and Compliance

Rekomendasi 5.1: Pengendalian Internal dan Kepatuhan.
Recommendation 5.1: Internal Control and Compliance.

Rekomendasi 5.1.1: Recommendation 5.1.1:	Keterangan: Description:	Status:
Direksi melakukan kaji ulang secara berkala atas ketepatan desain dan efektivitas operasional sistem governansi, pengelolaan risiko, pengendalian internal dan kepatuhan korporasi dan melaporkan pelaksanaan dan hasil kaji ulang kepada para Pemegang Saham melalui Laporan Tahunan Korporasi.	Direksi secara berkesinambungan melaksanakan penerapan, evaluasi, dan penyempurnaan atas tata kelola, manajemen risiko, pengendalian internal, serta kepatuhan Bank. Seluruh hasil pelaksanaan tersebut disampaikan melalui Laporan Tahunan sebagai bentuk pertanggungjawaban kepada Pemegang Saham dan pemangku kepentingan, serta dilaporkan lebih lanjut dalam RUPS.	Terpenuhi
The Board of Directors periodically reviews the accuracy of designs and operational effectiveness of the governance system, risk management, internal control, and corporate compliance and reports the implementation and review results to Shareholders through the Corporate Annual Report.	The Board of Directors is committed to instilling the values of Code of Conduct as part of establishing a work culture of integrity. This internalization process is implemented in a structured manner within the Bank's business and operational strategies, and integrated into risk management mechanism and remuneration policies.	Complied

Rekomendasi 5.2: Manajemen Risiko.
Recommendation 5.2: Risk Management.

Rekomendasi 5.2.1: Recommendation 5.2.1:	Keterangan: Description:	Status:
Strategi dan risiko merupakan satu kesatuan, diungkapkan secara transparan, masuk ke dalam pelaksanaan tugas dan tanggung jawab Direksi dan Dewan Komisaris, serta dalam diskusi di rapat Dewan Komisaris dan Direksi.	Dewan Komisaris dan Direksi berkomitmen mengelola serta memantau risiko utama Bank secara terukur dan berkesinambungan. Kebijakan strategis diarahkan untuk menjaga keseimbangan antara profil risiko, budaya kepatuhan, dan kecukupan modal. Dalam pelaksanaannya, Dewan Komisaris dan Direksi didukung oleh Komite Pemantau Risiko, Komite Manajemen Risiko, serta SKAI yang secara berkala melakukan penelaahan atas efektivitas pengendalian dan pengelolaan risiko.	Terpenuhi
Strategy and risk is a unity, disclosed transparently, included in the implementation of duties and responsibilities of the Board of Directors and Board of Commissioners, as well as in discussions at meetings of the Board of Commissioners and Board of Directors.	The Board of Commissioners and Board of Directors are committed to managing and monitoring the Bank's key risks in a measurable and sustainable manner. Strategic policies are directed at maintaining a balance between risk profile, compliance culture, and capital adequacy. In its implementation, the Board of Commissioners and Board of Directors are supported by Risk Monitoring Committee, Risk Management Committee, and SKAI, which periodically review the effectiveness of risk control and management.	Complied
Rekomendasi 5.2.2: **Recommendation 5.2.2:**	**Keterangan:** **Description:**	**Status:**
Komite Pemantau Manajemen Risiko membantu pelaksanaan tugas Dewan Komisaris dengan menciptakan mekanisme yang transparan, fokus, dan independen dalam pengawasan manajemen risiko korporasi.	Sebagai komite yang berada di bawah Dewan Komisaris, Komite Pemantau Risiko berperan mendukung efektivitas fungsi pengawasan melalui penerapan mekanisme pengawasan manajemen risiko yang independen, objektif, dan transparan. Seluruh aktivitas komite dijalankan berdasarkan pedoman yang tertuang dalam Piagam Komite Pemantau Risiko.	Terpenuhi
The Risk Management Monitoring Committee assists the implementation of the Board of Commissioners' duties by creating a transparent, focused, and independent mechanism for overseeing corporate risk management.	As a committee under the Board of Commissioners, the Risk Monitoring Committee plays a role in supporting the effectiveness of supervisory function by implementing oversight mechanism of an independent, objective, and transparent risk management. All committee activities are carried out based on the guidelines outlined in the Risk Monitoring Committee Charter.	Complied

Rekomendasi 5.3: Integrasi Governansi, Manajemen Risiko, dan Kepatuhan.
Recommendation 5.3: Integration of Governance, Risk Management, and Compliance.

Rekomendasi 5.3.1: Recommendation 5.3.1:	Keterangan: Description:	Status:
Direksi membangun sistem governansi, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi, dengan menangani berbagai ketidakpastian secara terpadu dan dengan integritas yang tinggi, untuk meyakinkan bahwa korporasi dapat mencapai tujuannya.	Direksi mengembangkan sistem tata kelola, manajemen risiko, dan kepatuhan (GRC) yang terintegrasi sebagai fondasi pengelolaan organisasi. Melalui pendekatan terpadu dalam menghadapi berbagai ketidakpastian dan berlandaskan integritas, sistem ini dirancang untuk memastikan Bank dapat mencapai sasaran strategis yang telah ditetapkan.	Terpenuhi
The Board of Directors establishes an integrated governance, risk management, and compliance (GRC) system, by handling various uncertainties in an integrated manner and with high integrity, to ensure that the corporation can achieve its objectives.	The Board of Directors develops an integrated governance, risk management, and compliance (GRC) system as the basis of organizational management. Through an integrated approach based on integrity in facing various uncertainties, this system is designed to ensure the Bank achieves its established strategic objectives.	Complied
Rekomendasi 5.3.2: **Recommendation 5.3.2:**	**Keterangan:** **Description:**	**Status:**
Direksi memastikan bahwa bagian yang membawahi fungsi kepatuhan tidak merangkap melaksanakan fungsi yang berpotensi menimbulkan benturan kepentingan.	Direktur Kepatuhan dan Manajemen Risiko beserta unit yang berada di bawah koordinasinya menjalankan fungsi kepatuhan secara independen tanpa merangkap tugas lain yang dapat menimbulkan potensi benturan kepentingan. Hal ini tercermin dalam struktur organisasi Bank sebagaimana disajikan dalam Laporan Tahunan ini.	Terpenuhi
The Board of Directors ensures that the division in charge of the compliance function does not concurrently perform functions that have the potential to cause a conflict of interest.	The Director of Compliance and Risk Management and the units under his/her coordination carry out compliance function independently without concurrent duties that could create a potential conflict of interest. This is reflected in the Bank's organizational structure, as presented in this Annual Report.	Complied

Rekomendasi 5.4: Audit Internal.
Recommendation 5.4: Internal Audit.

Rekomendasi 5.4.1: Recommendation 5.4.1:	Keterangan: Description:	Status:
Dewan Komisaris melalui Komite Audit memantau dan memastikan bahwa fungsi audit internal membantu korporasi untuk mencapai tujuannya dengan membawa pendekatan yang objektif dan disiplin untuk mengevaluasi dan meningkatkan efektivitas manajemen risiko, pengendalian internal, dan governansi korporat.	Dewan Komisaris melalui Komite Audit memastikan bahwa pelaksanaan fungsi audit internal Bank berjalan sesuai dengan kebutuhan organisasi, dengan menjunjung tinggi objektivitas serta berorientasi pada pencapaian tujuan yang strategis dan terukur.	Terpenuhi
The Board of Commissioners, through the Audit Committee, oversees and ensures that the internal audit function assists the corporation to achieve its objectives through an objective and disciplined approach to evaluate and improve the effectiveness of risk management, internal control, and corporate governance.	The Board of Commissioners, through Audit Committee, ensures that the Bank's internal audit function is implemented in accordance with organizational needs, upholding objectivity and oriented towards achieving strategic and measurable objectives.	Complied

Prinsip 6: Pengungkapan dan Transparansi
Principle 6: Disclosure and Transparency

Rekomendasi 6.1: Kebijakan Pengungkapan.
Recommendation 6.1: Disclosure Policy.

Rekomendasi 6.1.1: Recommendation 6.1.1:	Keterangan: Description:	Status:
Korporasi memiliki kebijakan dan prosedur pengungkapan dan transparansi yang memastikan pengungkapan informasi material dan menjaga informasi sensitif serta rahasia korporasi.	Anggaran Dasar Bank memuat ketentuan mengenai keterbukaan informasi, termasuk kewajiban pengungkapan informasi material sesuai peraturan yang berlaku, sekaligus mengatur perlindungan terhadap informasi yang bersifat sensitif dan rahasia.	Terpenuhi
The corporation has disclosure and transparency policies and procedures that ensure disclosure of material information and safeguard sensitive information as well as corporate secrets.	The Bank's Articles of Association contain provisions regarding information disclosure, including obligation to disclose material information in line with applicable regulations, while also regulating the protection of sensitive and confidential information.	Complied
Rekomendasi 6.1.2: **Recommendation 6.1.2:**	**Keterangan:** **Description:**	**Status:**
Hak Pemegang Saham untuk memperoleh secara teratur dan tepat waktu informasi material yang relevan tentang korporasi harus dipenuhi.	Bank menjamin kesetaraan hak bagi seluruh Pemegang Saham dalam memperoleh informasi material yang relevan, akurat, dan disampaikan secara tepat waktu. Penyampaian informasi tersebut dilaksanakan sesuai ketentuan peraturan yang berlaku, guna memastikan terwujudnya prinsip transparansi dan keadilan dalam pengelolaan Bank.	Terpenuhi
Shareholders' rights to obtain regularly and timely relevant material information regarding the corporation must be fulfilled.	The Bank guarantees equal rights for all Shareholders to obtain relevant, accurate, and timely material information. This information is presented in accordance with applicable regulations to ensure the realization of principles of transparency and fairness in the Bank's management.	Complied

Rekomendasi 6.2: Laporan Keuangan dan Keberlanjutan.
Recommendation 6.2: Financial Statements and Sustainability Report.

Rekomendasi 6.2.1: Recommendation 6.2.1:	Keterangan: Description:	Status:
Korporasi mengungkapkan sistem dan prosedur untuk memastikan bahwa Laporan Keuangan Interim yang tidak diaudit atau dikaji ulang oleh auditor eksternal secara material adalah akurat, lengkap, dan memberikan investor informasi yang tepat untuk membuat keputusan investasi yang tepat.	Bank menerapkan kebijakan internal yang memastikan setiap informasi keuangan ditelaah secara cermat sebelum disampaikan kepada publik maupun otoritas. Melalui peran Komite Audit, Bank melakukan peninjauan atas Laporan Keuangan, proyeksi, serta berbagai laporan lain yang berkaitan dengan informasi keuangan guna menjamin akurasi dan kepatuhan terhadap ketentuan yang berlaku.	Terpenuhi
The Corporation discloses systems and procedures to ensure that Interim Financial Statements that are not materially audited or reviewed by external auditors are accurate, complete, and provide investors with the appropriate information to make the right investment decisions.	The Bank implements internal policies that ensure all financial information is carefully reviewed prior to being disclosed to the public or authorities. Through the role of Audit Committee, the Bank reviews its Financial Statements, projections, and various other reports related to financial information to ensure accuracy and compliance with applicable regulations.	Complied

Rekomendasi 6.2.2: Recommendation 6.2.2:	Keterangan: Description:	Status:
Komite Audit memastikan kualitas audit Laporan Keuangan yang dilaksanakan oleh auditor eksternal. Kegiatan ini termasuk merekomendasikan penunjukan, penunjukan kembali dan, jika perlu, pemberhentian, serta remunerasi auditor eksternal. The Audit Committee ensures the quality of audit on Financial Statements conducted by the external auditors. This activity includes recommending the appointment, reappointment, and, if necessary, dismissal, and remuneration of the external auditors.	Salah satu tugas Komite Audit adalah menelaah pelaksanaan audit atas laporan keuangan historis tahunan yang dilakukan oleh akuntan publik maupun kantor akuntan publik, guna memastikan kualitas, independensi, serta kepatuhan terhadap standar yang berlaku. One duty of the Audit Committee is to review the audits of annual historical financial statements conducted by public accountant and public accounting firm to ensure its quality, independence, and compliance with applicable standards.	Terpenuhi Complied
Rekomendasi 6.2.3: **Recommendation 6.2.3:**	**Keterangan:** **Description:**	**Status:**
Laporan Keberlanjutan harus disiapkan dan diungkapkan dengan akurat dan disusun sesuai kerangka pelaporan keberlanjutan nasional atau internasional. The Sustainability Report shall be accurately prepared and disclosed and compiled in accordance with national or international sustainability reporting frameworks.	Laporan Keberlanjutan Bank disusun dengan mengacu pada kerangka pelaporan keberlanjutan yang ditetapkan oleh Otoritas Jasa Keuangan, sehingga penyajian informasi dilakukan secara transparan dan sesuai dengan standar regulasi yang berlaku. The Bank's Sustainability Report is prepared in accordance with the sustainability reporting framework established by the Financial Services Authority, thus ensuring that information is presented transparently and in accordance with applicable regulatory standards.	Terpenuhi Complied
Rekomendasi 6.2.4: **Recommendation 6.2.4:**	**Keterangan:** **Description:**	**Status:**
Korporasi menerbitkan Laporan Tahunan secara terintegrasi yang menempatkan kinerja historis ke dalam konteks dan menggambarkan risiko, peluang, dan prospek korporasi di masa depan, sehingga membantu Pemegang Saham dan pemangku kepentingan memahami tujuan strategis korporasi dan kemajuannya dalam menciptakan nilai yang berkelanjutan. The corporation issues an integrated Annual Report that puts historical performance into context and describes the corporation's risks, opportunities, and future prospects, thereby helping Shareholders and stakeholders understand the corporation's strategic objectives and its progress in creating sustainable value.	Laporan Tahunan Bank disusun secara terintegrasi untuk menyajikan kinerja historis sekaligus memberikan gambaran mengenai risiko, peluang, serta prospek ke depan. Penyajian ini bertujuan mendukung Pemegang Saham dan pemangku kepentingan dalam memahami arah strategis Bank serta upaya yang ditempuh untuk menciptakan nilai berkelanjutan. The Bank's Annual Report is prepared in an integrated manner to present historical performance while providing an overview of risks, opportunities, and future prospects. This presentation aims to support Shareholders and stakeholders in understanding the Bank's strategic direction and the efforts undertaken to create sustainable value.	Terpenuhi Complied

Rekomendasi 6.3: Diseminasi Informasi.
Recommendation 6.3: Dissemination of Information.

Rekomendasi 6.3.1: Recommendation 6.3.1:	Keterangan: Description:	Status:
Saluran penyebaran informasi harus menyediakan akses yang setara, tepat waktu, dan relatif murah untuk informasi yang relevan bagi pengguna. Channels for disseminating Information should provide users with equal, timely, and relatively inexpensive access to relevant information.	Bank menyediakan beragam kanal komunikasi untuk memastikan seluruh Pemegang Saham dan pemangku kepentingan memperoleh informasi secara adil, tepat waktu, relevan, dan efisien. Akses informasi tersebut difasilitasi melalui situs web resmi, media sosial, *e-mail blast*, paparan publik, siaran pers, serta saluran komunikasi internal yang ditujukan khusus bagi karyawan. The Bank provides various communication channels to ensure that all Shareholders and stakeholders receive information in a fair, timely, relevant, and efficient manner. Access to this information is facilitated through the official website, social media, email blasts, public exposes, press releases, and internal communication channels specifically for employees.	Terpenuhi Complied
Rekomendasi 6.3.2: **Recommendation 6.3.2:**	**Keterangan:** **Description:**	**Status:**
Korporasi memastikan bahwa pernyataan tahunan terhadap penerapan Pedoman Umum Governansi Korporat Indonesia, termasuk penjelasan atas penerapan atas masing-masing Rekomendasi dan Panduan tersedia di situs web selama jangka waktu minimal 5 (lima) tahun. The corporation ensures that an annual statement regarding the implementation of General Guidelines for Indonesian Corporate Governance, including an explanation of the implementation of each Recommendation and Guideline is available on the website for a minimum period of 5 (five) years.	Saat ini pernyataan mengenai penerapan PUGKI belum dipublikasikan melalui situs web Bank, namun telah disajikan secara lengkap dalam Laporan Tahunan sebagai bentuk transparansi dan pemenuhan kewajiban pelaporan. Currently, a statement regarding the implementation of PUGKI has not been published on the Bank's website, but it is presented in full in the Annual Report as a form of transparency and compliance with the reporting obligations.	Penjelasan Explanation

Rekomendasi 6.3.3: Recommendation 6.3.3:	Keterangan: Description:	Status:
Untuk korporasi yang terdaftar di pasar modal di yurisdiksi selain yurisdiksi asal, peraturan perundang-undangan atas governansi korporat yang berlaku harus di diungkapkan dengan jelas. Dalam hal *cross listing*, kriteria dan prosedur *cross listing*, kriteria dan prosedur untuk mengakui persyaratan *listing* untuk *listing* utama harus transparan dan didokumentasikan.	Bank adalah entitas usaha yang berdiri dan beroperasi di Indonesia dengan sepenuhnya mematuhi ketentuan hukum serta regulasi yang berlaku di yurisdiksi Indonesia.	Terpenuhi
For corporations listed on the capital market in jurisdictions other than the jurisdiction of origin, applicable laws and regulations on corporate governance must be clearly disclosed. In the case of cross listing, the criteria and procedures for cross listing, criteria and procedures for recognizing the listing requirements for the primary listing must be transparent and documented.	The Bank is a business entity established and operating in Indonesia and fully complies with applicable laws and regulations in Indonesian jurisdictions.	Complied

Prinsip 7: Perlindungan Terhadap Hak-Hak Pemegang Saham
Principle 7: Protection of Shareholders Rights

Rekomendasi 7.1: Hak Pemegang Saham.
Recommendation 7.1: Shareholders Rights.

Rekomendasi 7.1.1: Recommendation 7.1.1:	Keterangan: Description:	Status:
Korporasi memiliki suatu kebijakan komunikasi yang memfasilitasi dan mendorong partisipasi Pemegang Saham atau investor.	Anggaran Dasar Bank memuat ketentuan mengenai kebijakan komunikasi dengan Pemegang Saham dan investor sebagai landasan dalam menjalin hubungan yang transparan dan akuntabel.	Terpenuhi
The corporation has a communication policy that facilitates and encourages shareholder or investor participation.	The Bank's Articles of Association contain provisions regarding communication policies with Shareholders and investors as the basis for establishing transparent and accountable relationships.	Complied
Rekomendasi 7.1.2: **Recommendation 7.1.2:**	**Keterangan:** **Description:**	**Status:**
Korporasi yang merupakan Entitas Induk memastikan bahwa kebijakan governansi korporatnya berlaku bagi Entitas Anak dan Entitas Sepengendali yang di dalamnya investasi korporasi adalah signifikan.	Bank menetapkan kebijakan komunikasi dengan Pemegang Saham dan investor yang tertuang dalam Anggaran Dasar sebagai pedoman dalam menjaga keterbukaan informasi. Pada saat yang sama, Bank tidak memiliki Entitas Anak maupun Entitas Sepengendali.	Penjelasan
Corporations that are Parent Entities ensure that their corporate governance policies apply to Subsidiaries and Entities under Common Control in which their investment is significant.	The Bank has established communication policy with Shareholders and investors, outlined in the Articles of Association as a guideline for maintaining information transparency. At the same time, the Bank has no Subsidiary or Entity under Common Control.	Explanation
Rekomendasi 7.1.3: **Recommendation 7.1.3:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang mengatur akuisisi, pengambilalihan, dan transaksi luar biasa, seperti merger dan penjualan aset korporasi yang substansial untuk memastikan transaksi terjadi secara transparan dan dalam kondisi yang wajar dan melindungi hak-hak semua Pemegang Saham sesuai dengan kelasnya.	Anggaran Dasar Bank menetapkan prosedur terkait akuisisi, pengambilalihan, serta transaksi material lainnya. Di dalamnya juga diatur secara rinci hak, wewenang, dan tanggung jawab Pemegang Saham. Informasi tersebut tersedia dan dapat diakses melalui situs web resmi Bank di www.victoriabank.co.id.	Terpenuhi
Corporations have rules and procedures that govern acquisitions, takeovers, and extraordinary transactions, such as mergers and sales of substantial corporate assets to ensure that the transactions occur in a transparent manner and under reasonable conditions as well as protecting the rights of all Shareholders according to class.	The Bank's Articles of Association establish procedures related to acquisitions, takeovers, and other material transactions. They also detail the rights, authorities, and responsibilities of Shareholders. This information is available and accessible through the Bank's official website at www.victoriabank.co.id.	Complied

Rekomendasi 7.2: Perlakuan Adil Terhadap Pemegang Saham.
Recommendation 7.2: Fair Treatment to Shareholders.

Rekomendasi 7.2.1: **Recommendation 7.2.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang memastikan: 1. Semua Pemegang Saham dari seri yang sama dalam 1 (satu) kelas saham harus diperlakukan setara. 2. Pengungkapan aturan dan prosedur tersebut serta pengungkapan struktur modal dan pengaturan yang memungkinkan Pemegang Saham tertentu memeroleh pengaruh atau kendali yang tidak proporsional dengan kepemilikan sahamnya.	Bank menjamin perlakuan yang setara bagi seluruh Pemegang Saham, baik mayoritas maupun minoritas, domestik maupun asing. Setiap informasi yang relevan disampaikan secara transparan melalui kanal yang mudah diakses, seperti situs web Bank, Bursa Efek Indonesia, dan KSEI, dengan penyajian dalam bahasa Indonesia dan bahasa Inggris.	Terpenuhi
Corporations have rules and procedures ensuring that: 1. All Shareholders of the same series in 1 (one) class of shares shall be treated equally. 2. There shall be disclosure of such rules and procedures, as well as disclosure of capital structure and arrangements that allow certain Shareholders to gain influence or control that is disproportionate to their share ownership.	The Bank guarantees equal treatment for all Shareholders, including majority or minority, domestic or foreign. All relevant information is transparently communicated through easily accessible channels, such as the Bank's website, Indonesia Stock Exchange, and KSEI, presented in both Indonesian and English.	Complied
Rekomendasi 7.2.2: **Recommendation 7.2.2:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki aturan dan prosedur yang memastikan transaksi pihak berelasi disetujui dan dilaksanakan sedemikian rupa yang dapat meyakinkan bahwa benturan kepentingan telah dikelola dengan tepat, dan melindungi kepentingan korporasi dan Pemegang Saham.	Bank berkomitmen menjalankan setiap transaksi dengan pihak berelasi secara transparan dan independen, tanpa menimbulkan benturan kepentingan. Melalui mekanisme pengawasan yang ketat, Bank memastikan kepentingan institusi dan Pemegang Saham tetap terlindungi, sekaligus menjaga kepatuhan terhadap ketentuan yang berlaku serta meminimalkan potensi risiko.	Terpenuhi
The corporation has rules and procedures that ensure related party transactions are approved and implemented in such a way as to ensure that conflicts of interest are properly managed, and protect the interests of the corporation and Shareholders.	The Bank is committed to conducting all transactions with related parties transparently and independently, without creating conflicts of interest. Through strict oversight mechanisms, the Bank ensures that the interests of the institution and its Shareholders are protected, while maintaining compliance with applicable regulations and minimizing potential risks.	Complied
Rekomendasi 7.2.3: **Recommendation 7.2.3:**	**Keterangan:** **Description:**	**Status:**
Korporasi memiliki dan mengungkapkan kebijakan untuk mencegah terjadinya *insider trading*. Korporasi memiliki aturan yang jelas mengenai perdagangan apa pun dalam saham korporasi yang dilakukan oleh Direktur, Komisaris dan orang dalam untuk memastikan bahwa siapa pun tidak boleh mendapatkan keuntungan secara langsung atau tidak langsung dari informasi yang tidak/belum tersedia di pasar.	Kode Etik Bank mengatur secara jelas mekanisme pencegahan praktik *insider trading* sebagai bagian dari upaya menjaga integritas dan keadilan dalam kegiatan usaha.	Terpenuhi
The corporation has and discloses policies to prevent insider trading. The corporation has clear rules regarding any trading in corporate shares conducted by Directors, Commissioners, and insiders to ensure that no one may benefit directly or indirectly from information that is not/not yet available in the market.	The Bank's Code of Conduct clearly regulates the prevention of insider trading practices as part of efforts to maintain integrity and fairness in business activities.	Complied

Rekomendasi 7.3: Rapat Umum Pemegang Saham.
Recommendation 7.3: General Meeting of Shareholders.

Rekomendasi 7.3.1: **Recommendation 7.3.1:**	**Keterangan:** **Description:**	**Status:**
Korporasi melakukan panggilan RUPS dengan agenda dan materi RUPS selengkap dan sedini mungkin (paling lambat 28 hari sebelum RUPS) untuk memberikan waktu dan materi yang cukup bagi Pemegang Saham untuk mempelajari dengan baik agenda rapat. Undangan rapat dan seluruh informasi RUPS diungkapkan melalui sarana elektronik seperti melalui situs web korporasi.	Bank menyampaikan panggilan RUPS secara tepat waktu sesuai ketentuan perundang-undangan, sekaligus memberikan kesempatan bagi Pemegang Saham untuk memperoleh klarifikasi atau informasi tambahan terkait agenda yang akan dibahas. Undangan RUPS dipublikasikan melalui sarana elektronik, termasuk situs web Bank, Bursa Efek Indonesia, dan KSEI.	Terpenuhi
The corporation makes a notice for GMS with the agenda and materials for GMS as completely and as early as possible (no later than 28 days prior to the GMS) to provide sufficient time and materials for Shareholders to properly study the meeting agenda. Meeting invitations and all GMS information are disclosed through electronic means, such as through the corporate website.	The Bank delivers summon for the GMS in a timely manner in accordance with laws and regulations, while also providing Shareholders with the opportunity to obtain clarification or additional information regarding the agenda. Invitation to the GMS is published electronically, including on the Bank's website, Indonesia Stock Exchange, and KSEI.	Complied

Rekomendasi 7.3.2: Recommendation 7.3.2:	Keterangan: Description:	Status:
Korporasi memiliki dan mengungkapkan aturan dan prosedur yang memfasilitasi Pemegang Saham dalam berpartisipasi dan memberikan suara secara efektif di RUPS. The Corporation has and discloses rules and procedures that facilitate Shareholders to participate and vote effectively at the GMS.	Pada setiap penyelenggaraan RUPS, Bank menyampaikan tata tertib rapat yang memuat ketentuan serta fasilitas bagi Pemegang Saham, sehingga Pemegang Saham dapat berpartisipasi dan menyampaikan hak suaranya secara optimal. At each GMS, the Bank publishes meeting rules and procedures, which outline provisions and facilities for Shareholders, thus enabling them to participate and exercise their voting rights optimally.	Terpenuhi Complied
Rekomendasi 7.3.3: **Recommendation 7.3.3:**	**Keterangan:** **Description:**	**Status:**
Pemegang Saham berpartisipasi efektif dalam menetapkan penunjukan anggota Direksi dan Dewan Komisaris. Shareholders participate effectively to determine the appointment of members of the Board of Directors and Board of Commissioners.	Dalam RUPS yang membahas perubahan susunan pengurus, Bank memberikan ruang bagi Pemegang Saham untuk menyampaikan pertanyaan, memberikan tanggapan, serta menyalurkan hak suaranya. In GMS discussing changes to the management structure, the Bank provides a platform for Shareholders to raise questions, provide feedback, and cast their votes.	Terpenuhi Complied
Rekomendasi 7.3.4: **Recommendation 7.3.4:**	**Keterangan:** **Description:**	**Status:**
Korporasi memastikan transparansi dan akuntabilitas auditor eksternal di RUPS. The corporation ensures transparency and accountability of the external auditor at the GMS.	Pada RUPS dengan agenda penunjukan kantor akuntan publik dan/atau akuntan publik, Bank menyampaikan penjelasan mengenai pihak yang diusulkan guna memastikan transparansi dan memberikan dasar pertimbangan bagi Pemegang Saham dalam pengambilan keputusan. At GMS with the agenda of appointing public accounting firm and/or public accountant, the Bank provides an explanation of the proposed parties to ensure transparency and provide the basis for Shareholders' considerations in decision-making.	Terpenuhi Complied
Rekomendasi 7.3.5: **Recommendation 7.3.5:**	**Keterangan:** **Description:**	**Status:**
Penyampaian hasil pemungutan suara dan ringkasan risalah RUPS secara lengkap diumumkan ke publik pada hari kerja berikutnya. Submission of voting results and a complete summary of the GMS minutes are announced to the public on the following working day.	Hasil pemungutan suara beserta ringkasan risalah RUPS diumumkan kepada publik pada hari yang sama setelah rapat selesai, melalui situs web resmi Bank. The voting results, along with a summary of the GMS minutes, are announced to the public on the same day after the meeting is finished, through the Bank's official website.	Terpenuhi Complied

Prinsip 8: Penghargaan Terhadap Pemangku Kepentingan
Principle 8: Award for Stakeholders

Rekomendasi 8.1: Keterlibatan Pemangku Kepentingan Kunci (Stakeholder Engagement).
Recommendation 8.1: Key Stakeholder Engagement.

Rekomendasi 8.1.1: Recommendation 8.1.1:	Keterangan: Description:	Status:
Korporasi melalui Sekretaris Korporasi melaksanakan komunikasi yang reguler, transparan, dan efektif dengan pemangku kepentingan kunci serta melibatkan mereka untuk memahami harapan dan keluhan mereka serta dampak korporasi terhadap mereka. The corporation, through the Corporate Secretary, carries out regular, transparent, and effective communication with key stakeholders and engages them to understand their expectations, grievances, and the impact of the corporation on them.	Bank menjelaskan secara rinci dalam Laporan Tahunan mengenai proses identifikasi dan pemilihan pemangku kepentingan utama yang dilibatkan dalam berbagai aktivitas. Untuk memperkuat keterlibatan tersebut, Bank menyediakan mekanisme WBS sebagai saluran yang aman dan independen bagi pemangku kepentingan dalam menyampaikan masukan, saran, maupun pengaduan. Langkah ini menjadi wujud komitmen Bank dalam menjaga transparansi, memperkuat partisipasi, serta memastikan penanganan isu-isu penting yang relevan bagi keberlanjutan operasional. The Bank explains the process of identifying and selecting key stakeholders involved in various activities in details in its Annual Report. To strengthen this engagement, the Bank provides a secure and independent channel for stakeholders to submit input, suggestions, and complaints. This step demonstrates the Bank's commitment to maintaining transparency, strengthening participation, and ensuring timely handling of critical issues relevant to operational sustainability.	Terpenuhi Complied

Rekomendasi 8.2: Integrasi Keberlanjutan dalam Model Bisnis.
Recommendation 8.2: Integration of Sustainability in Business Models.

Rekomendasi 8.2.1: Recommendation 8.2.1:	Keterangan: Description:	Status:
Dewan Komisaris bersama-sama dengan Direksi bertanggung jawab, akuntabel, dan transparan atas governansi keberlanjutan, termasuk menetapkan strategi, prioritas, dan target keberlanjutan korporasi. Direksi dan Dewan Komisaris memasukkan pertimbangan keberlanjutan ketika menjalankan perannya, termasuk antara lain dalam pengembangan dan implementasi strategi korporasi, rencana bisnis, rencana aksi utama dan manajemen risiko.	Direksi berkomitmen mengomunikasikan strategi, prioritas, serta sasaran keberlanjutan perusahaan secara jelas kepada seluruh pemangku kepentingan. Setiap pencapaian dan kinerja terhadap sasaran tersebut dilaporkan secara transparan melalui Laporan Tahunan, sehingga memberikan gambaran menyeluruh atas konsistensi Bank dalam mendukung agenda keberlanjutan. Melalui keterbukaan informasi ini, pemangku kepentingan dapat menilai secara lebih baik langkah konkret yang ditempuh Bank dalam mencapai tujuan keberlanjutan.	Terpenuhi
The Board of Commissioners and the Board of Directors are responsible, accountable, and transparent for sustainability governance, including in establishing corporate sustainability strategies, priorities, and targets. The Board of Directors and Board of Board of Commissioners incorporate sustainability considerations when performing their roles, including by developing and implementing corporate strategies, business plans, main action plans, and risk management.	The Board of Directors is committed to clearly communicating the Company's sustainability strategy, priorities, and targets to all stakeholders. Each achievement and performance towards these targets is transparently reported through the Annual Report, providing a comprehensive overview of the Bank's consistency in supporting the sustainability agenda. Through this information transparency, stakeholders can better assess the concrete steps taken by the Bank to achieve its sustainability goals.	Complied

Rekomendasi 8.3: Perlindungan Terhadap Pemangku Kepentingan.
Recommendation 8.3: Protection for Stakeholders.

Rekomendasi 8.3.1: Recommendation 8.3.1:	Keterangan: Description:	Status:
Direksi memastikan dan mengungkapkan bahwa operasi korporasi mencerminkan penerapan standar etika, tanggung jawab sosial dan lingkungan yang tinggi di seluruh korporasi dan memastikan bahwa kebijakan dan prosedur yang tepat diterapkan untuk menghormati serta mematuhi hak-hak pemangku kepentingan.	Bank menetapkan sejumlah kebijakan sebagai acuan dalam menjalankan aktivitas usaha yang berlandaskan etika, tanggung jawab sosial, serta kepedulian terhadap lingkungan, sekaligus menjunjung tinggi hak-hak pemangku kepentingan. Seluruh kebijakan tersebut dipaparkan secara komprehensif dalam Laporan Tahunan Bank.	Terpenuhi
The Board of Directors ensures and discloses that corporate operations reflect the application of high standards of ethics, social and environmental responsibility throughout the corporation and ensures that appropriate policies and procedures are in place to respect and comply with stakeholder rights.	The Bank has established several policies as a guideline for conducting business activities based on ethics, social responsibility, and environmental awareness, while upholding stakeholder rights. All of these policies are comprehensively presented in the Bank's Annual Report.	Complied
Rekomendasi 8.3.2: **Recommendation 8.3.2:**	**Keterangan:** **Description:**	**Status:**
Direksi mendorong karyawan bekerja untuk kepentingan jangka panjang korporasi dan mengedepankan keberlanjutan.	Bank menerapkan standar operasional prosedur terkait kebijakan insentif jangka panjang bagi karyawan sebagai bagian dari upaya mendorong terciptanya nilai berkelanjutan. Kebijakan tersebut diatur dalam Keputusan Direksi No. 005/SK-DIR/01/24 tanggal 8 Januari 2024 tentang Standar Operasional Prosedur *Human Capital Management*.	Terpenuhi
The Board of Directors encourages employees to work for the long-term interests of the corporation and prioritizes sustainability.	The Bank implements standard operating procedures related to long-term incentive policies for employees as an effort to encourage the creation of sustainable value. These policies are regulated in Board of Directors' Decision No. 005/SK-DIR/01/24 dated 8 January 2024 on Standard Operating Procedures for Human Capital Management.	Complied

Rencana Strategis Bank
Bank's Strategic Plans

Rencana strategis Bank disusun secara terintegrasi dan meliputi rencana korporasi sebagai arah strategis serta Rencana Bisnis Bank (RBB) sebagai penjabaran rencana operasional dan target usaha yang disusun secara selaras dan berkesinambungan.

The Bank's strategic plan is developed in an integrated manner and encompasses corporate plan as its strategic direction and the Bank Business Plan (RBB) as a detailed outline of the operational plan and business targets, developed in a harmonious and sustainable manner.

Rencana Korporasi

Rencana korporasi merupakan bagian integral dari rencana strategis Bank yang disusun sebagai pedoman arah pengembangan usaha dan kebijakan strategis Bank dalam jangka menengah dan panjang. Rencana korporasi mencerminkan visi, misi, dan sasaran strategis Bank, serta menjadi landasan dalam pengambilan keputusan korporasi yang berdampak signifikan terhadap keberlanjutan usaha Bank.

Penyusunan rencana korporasi dilakukan secara terstruktur dan selaras dengan prinsip kehati-hatian, penerapan GCG, serta ketentuan peraturan perundang-undangan yang berlaku. Rencana korporasi mencakup arah pengembangan bisnis, strategi penguatan permodalan, pengelolaan risiko utama, serta kebijakan strategis lainnya yang relevan dengan dinamika lingkungan usaha dan industri perbankan.

Rencana Korporasi ditetapkan oleh Direksi dan diawasi oleh Dewan Komisaris, serta diselaraskan dengan keputusan RUPS dalam hal terkait aksi korporasi strategis. Rencana Korporasi selanjutnya dijabarkan secara operasional dalam RBB, sehingga memastikan konsistensi antara arah strategis jangka panjang dan rencana usaha jangka pendek hingga menengah.

Pelaksanaan dan pencapaian rencana korporasi dievaluasi secara berkala dengan memperhatikan perkembangan kondisi internal dan eksternal Bank, serta menjadi dasar dalam penyesuaian strategi bisnis dan kebijakan manajemen risiko guna menjaga kesinambungan dan pertumbuhan usaha Bank secara berkelanjutan.

Corporate Plan

Corporate plan is an integral part of the Bank's strategic plan, prepared as a guideline for the Bank's medium- and long-term business development and strategic policies. Corporate plan reflects the Bank's vision, mission, and strategic objectives and serves as the basis for corporate decision-making that significantly impacts the Bank's business sustainability.

The corporate plan is structured and aligned with prudent principles, GCG implementation, and applicable laws and regulations. Corporate plan encompasses business development direction, capital strengthening strategies, key risk management, and other strategic policies relevant to the dynamics of business environment and banking industry.

Corporate Plan is established by the Board of Directors, overseen by the Board of Commissioners, and aligned with GMS resolutions regarding strategic corporate actions. The Corporate Plan is further operationally elaborated in RBB, thus ensuring consistency between long-term strategic direction and short- to medium-term business plans.

The implementation and achievement of the corporate plan are periodically evaluated, by considering developments in the Bank's internal and external conditions, and serve as the basis for adjusting business strategies and risk management policies to maintain the Bank's continuity and sustainable growth.

Rencana Bisnis Bank

Dalam rangka menjaga kesinambungan arah bisnis yang sejalan dengan visi dan misi, Dewan Komisaris bersama Direksi secara konsisten melakukan komunikasi intensif untuk menyelaraskan pandangan terhadap rencana strategis Bank. Seluruh rencana strategis tersebut dituangkan dalam RBB yang disusun sesuai ketentuan Peraturan Otoritas Jasa

The Bank's Business Plan

To maintain the continuity of business direction in line with vision and mission, the Board of Commissioners and Board of Directors consistently communicate intensively to align their views on the Bank's strategic plan. All strategic plans are outlined in RBB, prepared in accordance with Financial Services Authority Regulation

Keuangan No. 5/POJK.03/2016 tentang Rencana Bisnis Bank Umum. Penyusunan RBB tidak hanya memperhatikan kondisi eksternal dan internal, tetapi juga menekankan penerapan prinsip kehati-hatian, pengelolaan risiko yang efektif, serta kepatuhan pada asas perbankan yang sehat. Untuk periode RBB 2026-2028, Bank menetapkan tema *"Strengthening Digital Transformation for Sustainable Banking Growth"* yang menjadi landasan utama dalam arah pengembangan bisnis, dengan rincian sebagai berikut:

Rencana Jangka Panjang

Dalam periode 5 (lima) tahun mendatang, Bank menetapkan strategi usaha yang berorientasi pada pertumbuhan berkelanjutan dan peningkatan daya saing. Fokus strategi ini meliputi:

1. Senantiasa menjaga dan memperkuat penerapan prinsip-prinsip GCG secara konsisten yang selaras dengan prinsip-prinsip manajemen risiko dan kepatuhan terhadap regulasi (*compliance*).
2. Menjaga dan memelihara permodalan di level yang kuat dan memadai sebagai landasan pengembangan dan pertumbuhan skala bisnis Bank yang *prudent* dan berkelanjutan.
3. Melanjutkan optimalisasi melalui evaluasi kinerja jaringan kantor cabang guna meningkatkan efisiensi dan produktivitas dalam rangka mencapai pertumbuhan bisnis yang berkelanjutan.
4. Melanjutkan dan meningkatkan inovasi produk dan layanan terbaik yang fokus kepada nasabah (*customer-centric*).
5. Melanjutkan pengembangan sistem teknologi informasi untuk mendukung efisiensi, inovasi dan pengembangan produk serta peningkatan layanan.
6. Mengembangkan kualitas dan meningkatkan produktivitas sumber daya manusia dan pelayanan nasabah untuk menghadapi tantangan bisnis.
7. Meningkatkan nilai perusahaan bagi Pemegang Saham dan pemangku kepentingan.

Rencana Jangka Menengah dan Pendek

Dalam rangka menjaga kesinambungan kinerja, Bank menetapkan sasaran jangka pendek untuk periode 1 (satu) tahun serta sasaran jangka menengah untuk periode 3 (tiga) tahun. Target yang disusun meliputi:

1. Penguatan GCG dan penerapan manajemen risiko, meliputi:
   a. Melanjutkan peningkatan internalisasi budaya kepatuhan secara berkelanjutan di seluruh aspek operasional dan bisnis Bank.
   b. Memperkuat fungsi pengawasan dan pengendalian risiko pada *second* dan *third line of defense*.
   c. Mencapai pertumbuhan bisnis yang berkelanjutan melalui penerapan dan pengelolaan GCG.

No. 5/POJK.03/2016 on Business Plan for Commercial Banks. RBB is not only prepared by considering external and internal conditions but also emphasizes the application of prudent principles, effective risk management, and adherence to sound banking principles. For the 2026-2028 RBB period, the Bank establishes the theme "Strengthening Digital Transformation for Sustainable Banking Growth," which serves as the main basis for its business development, with the following details:

Long-Term Plan

In the next 5 (five) year period, the Bank will establish a business strategy oriented towards sustainable growth and increased competitiveness. The focus of this strategy includes:

1. Consistently maintaining and strengthening the implementation of GCG principles in line with risk management principles and regulatory compliance.
2. Maintaining and fostering capital at a strong and adequate level as a basis for prudent and sustainable development and growth of the Bank's business scale.
3. Continuing optimization through evaluating the performance of branch office network to increase its efficiency and productivity to achieve sustainable business growth.
4. Continuing and improving product innovation and best services that focus on customers (customer-centric).
5. Continuing the development of information technology systems to support efficiency, innovation and product development as well as service improvements.
6. Developing quality and increasing the productivity of human resources and customer service to face business challenges.
7. Increasing Company value for Shareholders and stakeholders.

Medium and Short-Term Plans

To maintain performance continuity, the Bank has established short-term targets for 1 (one) year and medium-term targets for 3 (three) years. The targets developed include:

1. Strengthening GCG and risk management implementation, including:
   a. Continuing to improve the internalization of compliance culture in all aspects of the Bank's operations and business.
   b. Strengthening the supervision and risk control functions at the second and third lines of defense.
   c. Achieving sustainable business growth through the implementation and management of GCG.

2. Permodalan, yaitu dengan memperkuat dan/atau memelihara permodalan yang sehat guna menyerap risiko serta mendukung pertumbuhan bisnis berkelanjutan, melalui peningkatan laba (organik) dan penerbitan obligasi subordinasi.
3. Pengembangan bisnis, meliputi:
   a. Menerbitkan 15 (lima belas) produk dasar dan 12 (dua belas) produk lanjutan guna mendorong pertumbuhan bisnis yang berkelanjutan dan pengembangan produk (*customer-centric*) serta meningkatkan *fee-based income*.
   b. Meningkatkan kampanye pemasaran (*marketing campaign*) guna memperluas basis nasabah simpanan terutama nasabah kecil untuk meningkatkan porsi dana murah serta menekan *cost of fund*.
   c. Melanjutkan inisiatif-inisiatif kerja sama dalam pengembangan bisnis penyumbang *fee-based income* lain pada produk dan layanan *wealth management*.
   d. Meningkatkan efektivitas penanganan kredit bermasalah, kredit hapus buku, penyelesaian agunan yang diambilalih serta pemanfaatan aktiva tetap yang belum digunakan (properti terbengkalai) guna memelihara dan meningkatkan kualitas serta mengoptimalkan produktivitas aktiva dan meningkatkan pendapatan operasional selain bunga.
4. Sistem TI dengan memperkuat kapasitas dan kualitas layanan infrastruktur TI yang bisa menjamin keamanan dan menjaga kepercayaan nasabah guna mendukung kegiatan operasional.
5. Jaringan kantor:
   a. Melanjutkan peningkatan evaluasi kinerja jaringan kantor cabang yang ada guna mencapai tingkat profitabilitas yang menguntungkan.
   b. Melakukan penambahan jaringan kantor untuk meningkatkan layanan nasabah serta memperluas pasar secara geografis dalam mendukung bisnis.
6. Sumber daya manusia dan organisasi:
   a. Meningkatkan kualitas sumber daya manusia serta penguatan perangkat organisasi melalui program *training* yang berkelanjutan dan rekrutmen tenaga sesuai kebutuhan bisnis Bank dan regulasi.
   b. Meningkatkan kualitas sumber daya manusia dalam kompetisi yang dinamis melalui peningkatan *softskill* dan *hardskill*, program rekrutmen (*officer development program*) dan pelatihan terencana dalam kurun waktu 3 (tiga) bulan sekali dan terpadu seperti kewajiban pemenuhan sertifikasi dan *refreshment*.
7. Memastikan pertumbuhan dan peningkatan nilai Bank bagi seluruh Pemegang Saham dan pemangku kepentingan melalui strategi bisnis yang terukur dan berkelanjutan.

2. Capitalization, namely by strengthening and/or maintaining healthy capital to absorb risks and support sustainable business growth, through increased (organic) profits and issuance of subordinated bonds.
3. Business development, including:
   a. Issuing 15 (fifteen) basic products and 12 (twelve) advanced products to encourage sustainable business growth and customer-centric product development, while increasing fee-based income.
   b. Enhancing marketing campaigns to expand the deposit customer base, particularly small customers, to increase the portion of low-cost funds and reduce the cost of funds.
   c. Continuing collaborative initiatives in developing other fee-based income contributing businesses in wealth management products and services.
   d. Improving the effectiveness of handling non-performing loans, write-off loans, settlement of foreclosed assets, and utilization of unused fixed assets (abandoned properties) to maintain and improve quality, optimize asset productivity, and increase operating income other than interest.
4. IT systems by strengthening the capacity and quality of IT infrastructure services to ensure security and maintain customer trust to support operational activities.
5. Office network:
   a. Continuing to improve the performance evaluation of the existing branch office network to achieve a profitable level of profitability.
   b. Expanding office network to improve customer service and expand the market geographically to support business.
6. Human capital and organization:
   a. Improving the quality of human capital and strengthening the organizational tools through ongoing training programs and recruitment in accordance with the Bank's business needs and regulations.
   b. Improving the quality of human capital in a dynamic competitive environment through soft skills and hard skills development, recruitment programs (officer development programs), and planned training programs every 3 (three) months, integrated with mandatory certification and refresher courses.
7. Ensuring the growth and increase in the Bank's value for all Shareholders and stakeholders through measurable and sustainable business strategies.

Rencana Penanganan Permasalahan Keuangan dan/atau Penguatan Modal Bank

Dalam rangka menerapkan prinsip kehati-hatian dan menjaga kesinambungan usaha, Bank secara preventif menyusun rencana penanganan permasalahan keuangan dalam bentuk rencana aksi pemulihan (*recovery plan*), meskipun Bank berada dalam kondisi keuangan yang normal dan tidak berada dalam status pengawasan khusus. Rencana tersebut disiapkan sebagai langkah antisipatif untuk memastikan kesiapan Bank dalam menghadapi potensi tekanan yang dapat memengaruhi stabilitas keuangan.

Rencana aksi pemulihan disusun secara terintegrasi dengan proses *Internal Capital Adequacy Assessment Process* (ICAAP) dan RBB, dengan mempertimbangkan profil risiko, kecukupan permodalan, serta kondisi likuiditas Bank. Melalui keterkaitan tersebut, Bank memastikan bahwa strategi penguatan permodalan dan langkah pemulihan yang direncanakan selaras dengan arah pengembangan usaha dan kapasitas permodalan Bank.

Rencana aksi pemulihan telah memperoleh persetujuan Pemegang Saham melalui RUPS dan disampaikan kepada Otoritas Jasa Keuangan sesuai dengan ketentuan peraturan perundang-undangan mengenai penetapan status pengawasan dan penanganan permasalahan bank umum. Implementasi serta evaluasi atas rencana tersebut dilakukan secara berkala oleh Direksi dan diawasi oleh Dewan Komisaris guna memastikan efektivitasnya sebagai instrumen pencegahan dan kesiapan Bank dalam menjaga ketahanan permodalan dan likuiditas, serta pemenuhan ketentuan kehati-hatian yang berlaku.

Financial Problem Handling Plan and/or Bank Capital Strengthening

To implement prudent principles and maintain business continuity, the Bank prepares a preventive financial problem handling plan in form of recovery plan, even though the Bank is in a normal financial condition and not under special supervision status. This plan is prepared as an anticipatory measure to ensure the Bank's readiness to face potential pressures that could impact financial stability.

The recovery plan is developed in an integrated manner with the Internal Capital Adequacy Assessment Process (ICAAP) and RBB, by considering the Bank's risk profile, capital adequacy, and liquidity conditions. Through these relationships, the Bank ensures that its capital strengthening strategy and planned recovery measures are in line with the Bank's business development direction and capital capacity.

The recovery plan has received Shareholder approval through the GMS and has been submitted to the Financial Services Authority in accordance with laws and regulations on the determination of supervisory status and handling of commercial bank problems. The implementation and evaluation of this plan are carried out periodically by the Board of Directors and overseen by the Board of Commissioners to ensure its effectiveness as a preventative measure and the Bank's readiness to maintain capital and liquidity resilience, as well as compliance with applicable prudent regulations.

Pembelian Kembali Saham dan/atau Obligasi

Shares and/or Bonds Buy Back

Sepanjang tahun 2025, Bank tidak melaksanakan aksi korporasi berupa pembelian kembali saham maupun obligasi yang sebelumnya telah diterbitkan dan tercatat di Bursa Efek Indonesia.

Throughout 2025, the Bank did not carry out any corporate actions in form of share or bonds buy back previously issued and listed on Indonesia Stock Exchange.

Kebijakan Transaksi dengan Pihak yang Memiliki Hubungan Istimewa

Transaction Policy with Related Party

Bank memiliki dan menerapkan kebijakan serta prosedur transaksi dengan pihak yang memiliki hubungan istimewa sebagai bagian dari penerapan GCG dan upaya pencegahan serta penanganan benturan kepentingan. Kebijakan tersebut bertujuan untuk memastikan bahwa setiap transaksi dengan pihak yang memiliki hubungan istimewa dilaksanakan secara wajar (*arm's length principle*) dan tidak lebih menguntungkan dibandingkan dengan transaksi dengan pihak lain dalam kondisi yang serupa, serta senantiasa mengutamakan kepentingan terbaik Bank.

The Bank has and implements policy and procedures for transactions with related parties as part of its GCG implementation and efforts to prevent and handle conflicts of interest. This policy aims to ensure that every transaction with related parties is conducted on an arm's length principle and is not more advantageous than transactions with other parties under similar circumstances, while always prioritizing the Bank's best interests.

Pihak yang memiliki hubungan istimewa dengan Bank mencakup, antara lain pihak yang mengendalikan atau dikendalikan oleh Bank, Pemegang Saham Pengendali dan Pemegang Saham Mayoritas, perusahaan terafiliasi, anggota Direksi, Dewan Komisaris, Dewan Pengawas Syariah, Pejabat Eksekutif, serta pihak lain yang memiliki hubungan pengaruh atau hubungan keluarga sesuai dengan ketentuan peraturan perundang-undangan yang berlaku. Bank melakukan pengkajian dan pemutakhiran daftar pihak yang memiliki hubungan istimewa secara berkala.

Parties with special relationships with the Bank, include those controlling or controlled by the Bank, Controlling Shareholders and Majority Shareholders, affiliated companies, members of the Board of Directors, Board of Commissioners, Sharia Supervisory Board, Executive Officers, and other parties with influence or family relationships, in accordance with applicable laws and regulations. The Bank periodically reviews and updates the list of related parties.

Kebijakan dan prosedur tersebut mengatur cakupan transaksi dengan pihak yang memiliki hubungan istimewa secara luas, tidak terbatas pada transaksi kredit atau pembiayaan, namun juga mencakup berbagai bentuk eksposur dan transaksi lainnya, termasuk jasa, pembelian dan penjualan aset, sewa, perdagangan, pembentukan usaha patungan, serta transaksi keuangan lainnya. Setiap transaksi dilakukan melalui proses identifikasi, penilaian kewajaran, dan pengendalian risiko yang memadai.

These policy and procedures broadly regulate the scope of transactions with related parties, not limited to loan or financing transactions, but also encompass various forms of exposures and other transactions, including services, asset purchases and sales, lease, trade, joint ventures, and other financial transactions. Each transaction is conducted through a process of identification, fairness assessment, and adequate risk control.

Dalam rangka menjaga independensi dan objektivitas, anggota Direksi dan Dewan Komisaris yang memiliki kepentingan wajib mengungkapkan benturan kepentingan dan dikecualikan dari proses persetujuan maupun pengelolaan transaksi terkait. Transaksi dengan pihak yang memiliki hubungan istimewa serta penghapusan eksposur terkait dilaksanakan sesuai dengan kewenangan dan memperoleh persetujuan organ Bank yang berwenang. Direksi dan Dewan Komisaris melakukan pemantauan secara berkala atas transaksi dan eksposur kepada pihak yang memiliki hubungan istimewa, termasuk melalui mekanisme pelaporan dan penelaahan independen.

To maintain independence and objectivity, members of the Board of Directors and Board of Commissioners with interests are required to disclose conflicts of interest and are excluded from the approval process and management of related transactions. Transactions with related parties and elimination of related exposures are carried out in accordance with authority and obtain approval of the Bank's authorized organs. The Board of Directors and Board of Commissioners regularly monitor transactions and exposures to related parties, including through independent reporting and review mechanisms.

Bank juga menetapkan batasan eksposur terhadap pihak yang memiliki hubungan istimewa sesuai dengan kompleksitas dan profil risiko Bank, serta menerapkan mekanisme pelaporan atas setiap pengecualian kebijakan atau batasan yang ditetapkan, guna memastikan pengelolaan risiko dan pencegahan benturan kepentingan dilakukan secara efektif dan berkesinambungan.

The Bank also establishes limits on exposure to related parties in accordance with the Bank's complexity and risk profile, and implements reporting mechanism for any exceptions to established policies or limits, to ensure an effective and sustainable risk management and conflict of interest prevention.

Penyediaan Dana kepada Pihak terkait dan/atau Penyediaan Dana Besar

Provision of Funds to Related Parties and/or Provision of Large Exposure

Dalam menyalurkan dana kepada pihak terkait maupun debitur dengan eksposur besar, Bank senantiasa mematuhi ketentuan regulator, termasuk Peraturan Otoritas Jasa Keuangan No. 32/POJK.03/2018 tentang Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum, serta pedoman internal yang berlaku. Sepanjang tahun 2025, realisasi penyediaan dana kepada pihak terkait maupun debitur inti non-terkait diungkapkan sebagai berikut:

In lending to related parties and debtors with significant exposures, the Bank consistently complies with regulatory requirements, including Financial Services Authority Regulation No. 32/POJK.03/2018 on the Legal Lending Limit and Large Exposure for Commercial Bank, as well as applicable internal guidelines. Throughout 2025, the realization of funds provided to related parties and non-related core debtors was disclosed as follows:

Penyediaan Dana **Provision of Fund**	**Debitur** **Debtor**	**Total** **(Juta Rupiah / Million Rupiah)**
Kepada Pihak Terkait To Related Parties	17	**220,483**
Kepada Debitur Inti:		
Individu Individual	-	**-**
Kelompok Group	65	**10,890,922**

Kepatuhan Perpajakan
Tax Compliance

Sebagai lembaga keuangan yang tunduk pada ketentuan hukum, Bank Victoria berkomitmen untuk melaksanakan kewajiban perpajakan secara disiplin dan transparan. Bank melaksanakan pemotongan dan pemungutan pajak atas setiap objek pajak sesuai peraturan yang berlaku, termasuk Pajak Penghasilan (PPh) karyawan serta Pajak Pertambahan Nilai (PPN). Selain itu, Bank menyampaikan Surat Pemberitahuan (SPT) baik bulanan maupun tahunan, beserta dokumen pendukung lainnya kepada otoritas terkait secara tepat waktu. Untuk mendukung akurasi dan kepatuhan, pelaporan dilakukan melalui sistem Direktorat Jenderal Pajak, sedangkan pencatatan administrasi dilakukan terintegrasi dengan sistem *core banking* Bank.

As a financial institution subject to legal provisions, Bank Victoria is committed to implementing its tax obligations in a disciplined and transparent manner. The Bank withholds and collects taxes on all taxable items in accordance with applicable regulations, including employee Income Tax (PPh) and Value Added Tax (VAT). Furthermore, the Bank submits monthly and annual Tax Returns (SPT), along with other supporting documents, to relevant authorities in a timely manner. To ensure accuracy and compliance, reporting is conducted through the system of the Directorate General of Taxes, while administrative records are integrated with the Bank's core banking system.

Transparansi Kondisi Keuangan dan Non-Keuangan Bank yang Belum Diungkap dalam Laporan Lain
Transparency of the Bank's Financial and Non-Financial Conditions that Have Not Been Disclosed in Other Report

Bank memiliki kebijakan serta prosedur yang dirancang untuk memastikan keterbukaan informasi, baik terkait kondisi keuangan maupun non-keuangan. Kebijakan ini disusun dengan mengacu pada ketentuan berikut:

1. Peraturan Otoritas Jasa Keuangan No. 18 Tahun 2025 tentang Transparansi dan Publikasi Laporan Bank.
2. Peraturan Otoritas Jasa Keuangan No. 29/POJK.04/2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik.
3. Peraturan Otoritas Jasa Keuangan No. 14/POJK.04/2022 tentang Penyampaian Laporan Keuangan Berkala Emiten atau Perusahaan Publik.
4. Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021 tentang Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.
5. Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum.
6. Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.

The Bank has policies and procedures designed to ensure transparency of information, both regarding financial and non-financial conditions. This policies are prepared by referring to the following provisions:

1. Financial Services Authority Regulation No. 18 of 2025 on Transparency and Publication of Bank Reports.
2. Financial Services Authority Regulation No. 29/POJK.04/2016 on Annual Report of Issuers or Public Companies.
3. Financial Services Authority Regulation No. 14/POJK.04/2022 on Submission of Periodic Financial Statements of Issuers or Public Companies.
4. Financial Services Authority Circular No. 16/SEOJK.04/2021 on the Form and Content of Annual Reports of Issuers or Public Companies.
5. Financial Services Authority Regulation No. 13/POJK.03/2021 on Implementation of Commercial Bank Products.
6. Financial Services Authority Regulation No. 22 of 2023 on Consumer and Public Protection in Financial Services Sector.

7. Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik.
8. Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2025 tentang Pelaporan Bank Umum melalui Sistem Pelaporan Otoritas Jasa Keuangan.
9. Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank.

Bank menyampaikan informasi keuangan maupun non-keuangan secara terbuka dan mudah diakses oleh seluruh pemangku kepentingan. Penyampaian informasi dilakukan melalui berbagai media, baik dalam bentuk laporan cetak maupun publikasi digital pada situs resmi Bank. Bentuk laporan yang disajikan meliputi Laporan Tahunan, Laporan Keuangan Publikasi Triwulanan, serta Laporan Keuangan Publikasi Bulanan, yang seluruhnya disusun untuk mendukung prinsip transparansi dan akuntabilitas.

7. Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.
8. Financial Services Authority Regulation No. 22 of 2025 on Reporting of Commercial Banks through the Financial Services Authority Reporting System.
9. Financial Services Authority Regulation No. 15 of 2024 on Integrity of Financial Reporting of the Bank.

The Bank presents financial and non-financial information openly and easily accessible to all stakeholders. Information is delivered through various media, both in printed reports and digital publications on the Bank's official website. The reports presented include Annual Report, Quarterly Published Financial Statements, and Monthly Published Financial Statements, all of which are prepared to support the principles of transparency and accountability.

Informasi Lain terkait Tata Kelola Bank

Other Information related to Bank Governance

Sepanjang tahun 2025, Bank senantiasa menegakkan prinsip profesionalisme dan transparansi dalam setiap aktivitas usaha. Bank memastikan tidak adanya campur tangan dari Pemegang Saham maupun pihak eksternal, serta menjaga harmonisasi internal dengan mengelola kebijakan remunerasi secara hati-hati agar tidak menimbulkan potensi konflik. Seluruh kegiatan operasional dijalankan dengan berpedoman pada prinsip GCG, Kode Etik, Peraturan Perusahaan, serta ketentuan hukum yang berlaku, sehingga keputusan dan langkah bisnis yang diambil tetap terkendali serta meminimalkan potensi risiko yang merugikan.

Throughout 2025, the Bank consistently upheld the principles of professionalism and transparency in all business activities. The Bank ensures that there is no interference from Shareholders or external parties and maintains internal harmony by carefully managing remuneration policies to avoid potential conflicts. All operational activities are conducted in accordance with GCG principles, Code of Conduct, Company Regulations, and applicable legal provisions, thus ensuring that business decisions and actions remain under control and potential adverse risks are minimized.

Pernyataan dan Praktik *Bad Corporate Governance*

Statement and Practices of Bad Corporate Governance

Sepanjang tahun 2025, Bank senantiasa memastikan kepatuhan terhadap seluruh regulasi dan ketentuan yang berlaku dalam penerapan tata kelola perusahaan. Dalam periode tersebut, Bank tidak menemukan adanya praktik yang bertentangan dengan prinsip GCG maupun tindakan yang berpotensi mengganggu kualitas penerapannya. Hal ini tercermin pada data yang ditampilkan dalam tabel berikut:

Throughout 2025, the Bank consistently ensured compliance with all applicable regulations and provisions regarding the implementation of corporate governance. In that period, the Bank did not find any practices that were contrary to GCG principles or actions that could potentially compromise the quality of its implementation. This is reflected in the data presented in the following table:

Uraian **Description**	**Praktik** **Practice**
Adanya laporan sebagai Bank yang mencemari lingkungan. There is a report that the Bank pollutes the environment.	**Nihil** **None**
Perkara penting yang sedang dihadapi oleh Bank, anggota Direksi dan/atau anggota Dewan Komisaris yang sedang menjabat tidak diungkapkan dalam Laporan Tahunan. Significant cases currently faced by the Bank, members of Board of Directors, and/or members of Board of Commissioners are not disclosed in the Annual Report.	**Nihil** **None**
Ketidakpatuhan dalam pemenuhan kewajiban perpajakan. Non-compliance in fulfilling tax obligations.	**Nihil** **None**
Ketidaksesuaian penyajian Laporan Tahunan dan Laporan Keuangan dengan peraturan yang berlaku dan Standar akuntansi Keuangan. Inconsistency of presentation of Annual Report and Financial Statements with the the applicable regulations and Financial Accounting Standards.	**Nihil** **None**
Kasus terkait buruh dan karyawan. Cases related to workers and employees.	**Nihil** **None**
Tidak terdapat pengungkapan segmen operasi. There are no disclosures on operational segment.	**Nihil** **None**
Terdapat ketidaksesuaian antara Laporan Tahunan *hardcopy* dengan Laporan Tahunan *softcopy*. There is inconsistency between Annual Report's hard copy and Annual Report's softcopy.	**Nihil** **None**



Struktur Permodalan dan Manajemen Risiko

Capital Structure and Risk Management





07.

Pengungkapan Permodalan
Disclosure of Capital

Bank senantiasa menjaga struktur permodalan yang kuat sebagai fondasi dalam menghadapi dinamika risiko dan peluang usaha. Kepatuhan terhadap ketentuan regulator menjadi prioritas dalam memastikan stabilitas operasional yang berkelanjutan. Dengan demikian, Bank mampu mempertahankan kepercayaan pemangku kepentingan sekaligus memperkuat posisi kompetitif di industri perbankan serta mendorong kontribusi nyata terhadap pertumbuhan ekonomi nasional.

The Bank consistently maintains a strong capital structure as a foundation for addressing dynamic risks and business opportunities. Compliance with regulatory requirements serves as the priority in ensuring sustainable operational stability. Thus, the Bank is able to maintain stakeholder trust while strengthening its competitive position in banking industry and driving tangible contribution to the national economic growth.

Kebijakan Manajemen Permodalan

Dalam rangka menjaga ketahanan keuangan jangka panjang, Bank Victoria mengimplementasikan strategi pengelolaan permodalan yang berfokus pada kesinambungan, efisiensi struktur modal, dan kepatuhan terhadap seluruh ketentuan regulator. Pendekatan ini dirancang untuk mendukung pertumbuhan bisnis secara bertahap dan berkelanjutan, sekaligus memastikan bahwa Bank memiliki kapasitas permodalan yang memadai guna mengelola risiko dan menjalankan fungsi intermediasi secara optimal. Seluruh kebijakan tersebut disusun berdasarkan regulasi yang ditetapkan oleh Otoritas Jasa Keuangan, di antaranya:

1. Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tanggal 2 Februari 2016.
2. Peraturan Otoritas Jasa Keuangan No. 34/POJK.03/2016 tanggal 26 September 2016, Perubahan atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.
3. Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tanggal 26 Desember 2022, Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum.

Sebagai bagian dari perencanaan strategis, Bank merancang kebijakan pengelolaan permodalan yang selaras dengan arah pengembangan usaha dan telah memperoleh persetujuan dari Direksi serta Dewan Komisaris. Perencanaan ini dirumuskan untuk memastikan ketersediaan modal yang memadai dalam mendukung pertumbuhan bisnis, mempertahankan struktur modal yang sehat, serta memenuhi ketentuan regulator. Dalam prosesnya, Bank memperhitungkan berbagai faktor, seperti kebutuhan ekspansi, ketentuan permodalan minimum, serta alternatif penguatan modal. Pengelolaan permodalan dilakukan secara adaptif dengan mempertimbangkan dinamika ekonomi dan pasar, serta dievaluasi secara berkala

Capital Management Policy

To maintain a long-term financial resilience, Bank Victoria implements capital management strategy that focuses on sustainability, capital structure efficiency, and compliance with all regulatory requirements. This approach is designed to support gradual and sustainable business growth, while ensuring that the Bank has adequate capital capacity to manage risks and perform its intermediation function optimally. All of such policies are prepared based on the regulations set by Financial Services Authority, including:

1. Financial Services Authority Regulation No. 11/POJK.03/2016 dated 2 February 2016.
2. Financial Services Authority Regulation No. 34/POJK.03/2016 dated 26 September 2016, Amendments to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks.
3. Financial Services Authority Regulation No. 27 of 2022 dated 26 December 2022, Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks.

As part of the strategic planning, the Bank designs capital management policy in line with its business development direction and has obtained approval from the Board of Directors and Board of Commissioners. This plan is formulated to ensure adequate capital availability to support business growth, maintain sound capital structure, and comply with regulatory requirements. In this process, the Bank considers various factors, such as expansion needs, minimum capital requirements, and capital strengthening alternatives. Capital management is carried out adaptively, with due observance of economic and market dynamics, and is periodically evaluated through Internal Capital Adequacy Assessment Process (ICAAP) to maintain its readiness

melalui Proses Penilaian Kecukupan Modal Internal (*Internal Capital Adequacy Assessment Process*/ICAAP) guna menjaga kesiapan menghadapi berbagai kondisi, termasuk potensi tekanan eksternal.

Struktur Permodalan

Dalam rangka memenuhi standar permodalan yang ditetapkan oleh regulator, Bank Victoria membentuk kerangka permodalan yang terdiri atas 2 (dua) pilar utama, yaitu:

1. Modal inti (*tier* 1), yang meliputi:
   a. Modal inti utama (*common equity tier* 1)
      Modal inti utama mencakup modal disetor, cadangan tambahan modal (*disclosed reserve*), dan faktor pengurang modal inti utama. Cadangan tambahan modal terdiri atas faktor penambah (pendapatan komprehensif lainnya dan cadangan tambahan modal lainnya) dan faktor pengurang (pendapatan komprehensif lainnya dan cadangan tambahan modal lainnya).
   b. Modal inti tambahan (*additional tier* 1).
2. Modal pelengkap (*tier* 2)
   Modal pelengkap (*tier* 2) meliputi cadangan umum Penyisihan Penghapusan Aset (PPA) atas aset produktif yang wajib dibentuk (paling tinggi 1,25% ATMR Risiko Kredit).

Hingga akhir tahun 2025, Bank Victoria mencatat total modal sebesar Rp5,13 triliun, didominasi oleh komponen modal inti (tier 1) sebesar Rp4,00 triliun. Jika dibandingkan dengan posisi per 31 Desember 2024 yang sebesar Rp4,42 triliun, terjadi peningkatan sebesar 16,12%. Perubahan ini terutama disebabkan oleh pergerakan pada komponen modal inti (tier 1) yang mengalami kenaikan sebesar 11,62%. Dengan struktur permodalan tersebut, rasio Kewajiban Penyediaan Modal Minimum (KPMM) Bank tercatat sebesar 23,84% pada akhir tahun 2025, lebih tinggi dibandingkan tahun sebelumnya yang sebesar 21,53%.

Kecukupan Permodalan

Bank Victoria memastikan kecukupan permodalan yang sesuai dengan ketentuan regulasi yang ditetapkan oleh Bank Indonesia dan Otoritas Jasa Keuangan, dengan mengacu pada standar *Basel* II dan *Basel* III (lebih dikenal sebagai reformasi *Basel* III). Langkah ini dilakukan untuk memastikan bahwa Bank mampu menjaga kecukupan modal yang lebih

to face various conditions, including potential external pressures.

Capital Structure

To meet the capital standards set by regulators, Bank Victoria establishes a capital framework consisting of 2 (two) main pillars namely:

1. Tier 1, which includes:
   a. Common equity tier 1
      Common equity tier 1 includes paid-up capital, disclosed reserve, and impairment factor for common equity tier 1. Additional capital reserves consist of additional factors (other comprehensive income and other additional capital reserves) and deduction factors (other comprehensive income and other additional capital reserves).
   b. Additional tier 1.
2. Tier 2
   Tier 2 includes general reserves of Allowance for Asset Losses (PPA) for earning assets that must be formed (a maximum of 1.25% RWA Credit Risk).

Until the end of 2025, Bank Victoria recorded total capital of Rp5.13 trillion, dominated by core capital (tier 1) of Rp4.00 trillion. Compared to the position as of 31 December 2024 of Rp4.42 trillion, there was an increase of 16.12%. This change was primarily due to the movements in core capital (tier 1) component which increased by 11.62%. With this capital structure, the Bank's Capital Adequacy Ratio (CAR) was recorded at 23.48% at the end of 2025, higher than that of the previous year of 21.53%.

Capital Adequacy

Bank Victoria ensures that the adequate capital is in accordance with the regulatory requirements set by Bank Indonesia and the Financial Services Authority, with reference to Basel II and Basel III standards (widely known as Basel III reforms). This step is taken to ensure that the Bank is able to maintain adequate capital that is more responsive

responsif terhadap risiko-risiko utama dalam kegiatan perbankan, sambil tetap memberikan imbal hasil yang optimal bagi para pemangku kepentingan. Pendekatan ini mencakup 3 (tiga) pilar utama, yaitu:

1. Pilar 1 (*Minimum Capital Requirements*)
   Sesuai dengan ketentuan regulasi, secara umum, metodologi yang digunakan dalam menilai kecukupan dan kebutuhan modal untuk risiko kredit, risiko pasar, dan risiko operasional.
2. Pilar 2 *(Supervisory Review Process)*
   Bank Victoria telah menerapkan ICAAP, yaitu proses untuk menetapkan kecukupan modal yang sesuai dengan profil risiko Bank, dan menetapkan strategi untuk memelihara tingkat permodalan.
3. Pilar 3 *(Market Discipline)*
   Bank Victoria menerapkan disiplin pasar melalui transparansi dan pengungkapan atas informasi keuangan Bank.

Penyesuaian terhadap implementasi *Basel* III, regulator telah mengeluarkan ketentuan mengenai kewajiban penyediaan modal minimum bank umum, di mana Bank wajib membentuk tambahan modal sebagai penyangga (*buffer*). Tambahan modal tersebut berupa:

1. *Capital Conservation Buffer*
   Penyangga untuk mengantisipasi terjadinya kerugian pada periode krisis.
2. *Countercyclical Buffer*
   Penyangga untuk mengantisipasi terjadinya kerugian apabila pertumbuhan kredit perbankan berlebihan yang berpotensi mengganggu stabilitas sistem keuangan.
3. *Capital Surcharge* untuk *Domestic Systemically Important Bank* (D-SIB).

Penyangga untuk mengurangi dampak negatif terhadap stabilitas sistem keuangan dan perekonomian apabila terjadi kegagalan Bank yang berdampak sistemik, melalui peningkatan kemampuan Bank dalam menyerap kerugian.

Bank Victoria telah menerapkan perhitungan kewajiban membentuk tambahan modal sebagai penyangga (*buffer*) dalam KPMM sesuai dengan ketentuan regulator. Sebagai Bank KBMI I, Bank Victoria tidak diwajibkan untuk menyediakan *capital conservation buffer* karena ketentuan penyediaan modal tersebut berlaku untuk Bank KBMI II, KBMI III, dan KBMI IV.

Pengungkapan permodalan Bank Victoria sebagai berikut:

1. Tabel Utama (*Key Metrics*).
2. Tabel Perbedaan antara Cakupan Konsolidasi dan *Mapping* pada Laporan Keuangan sesuai Standar Akuntansi Keuangan dengan Kategori Risiko sesuai dengan Ketentuan Otoritas Jasa Keuangan Kategori Risiko (LI1).

to the main risks in banking activities, while still providing optimal returns for stakeholders. This approach includes 3 (three) main pillars, namely:

1. Pillar 1 (Minimum Capital Requirements)
   The method is generally used for assessing capital adequacy and requirements for credit risk, market risk, and operational risk, which follows regulatory provisions.
2. Pillar 2 (Supervisory Review Process)
   Bank Victoria has implemented the ICAAP, which is a process to determine the capital adequacy according to the Bank's risk profile and to determine a strategy to maintain capital rating.
3. Pillar 3 (Market Discipline)
   Bank Victoria applies market discipline through transparency and disclosure of the Bank's financial information.

Adjusting to the implementation of Basel III, the regulator has issued a provision on minimum capital adequacy ratio for commercial bank, in which the Bank is required to establish additional capital as a buffer. The additional capital can be in the form of:

1. Capital Conservation Buffer
   A buffer to anticipate a loss in crisis period.
2. Countercyclical Buffer
   A buffer to anticipate losses in the event of excessive banking credit growth that potentially interferes with the financial system stability.
3. Capital Surcharge for Domestic Systemically Important Bank (D-SIB).

A buffer to reduce negative impacts on the financial system stability and economy in the event of Bank failure that has systemic impact, through the improvement of the Bank's ability to absorb losses.

Bank Victoria has applied the calculation of the requirement to form additional capital as a buffer in the CAR in accordance with the regulatory provisions. As a bank of KBMI I, Bank Victoria is not required to provide capital conservation buffer because the capital requirement provision applies to banks of KBMI II, KBMI III, and KBMI IV.

Bank Victoria's disclosure of capital is as follows:

1. Main Table (Key Metrics).
2. Table of Difference between Consolidated and Mapping Coverage on the Financial Statements in accordance with the Financial Accounting Standards with Risk Categories in accordance with the Financial Services Authority Provisions for Risk Category (LI1).

3. Tabel Perbedaan Utama antara Nilai Tercatat sesuai Standar Akuntansi Keuangan dengan Nilai Eksposur sesuai dengan Ketentuan Otoritas Jasa Keuangan (LI2).

4. Tabel Penjelasan mengenai Perbedaan antara Nilai Eksposur sesuai Standar Akuntansi Keuangan dengan Ketentuan Otoritas Jasa Keuangan (LIA).

5. Tabel Komposisi Permodalan (CC1).
6. Tabel Rekonsiliasi Permodalan (CC2).
7. Tabel Fitur Utama Instrumen Permodalan dan Instrumen TLAC - *Eligible* (CCA).
8. Tabel Rasio Pengungkit - Laporan Kewajiban Pemenuhan Rasio Pengungkit.
9. Tabel Rasio Pengungkit - Laporan Perhitungan Rasio Pengungkit.

3. Table of Key Differences between Carrying Value in accordance with the Financial Accounting Standards and Exposure Value in accordance with the Financial Services Authority Regulations (LI2).
4. Table of Explanation on the Differences between the Exposure Values in accordance with the Financial Accounting Standards and Financial Services Authority Provisions (LIA).
5. Table of Capital Composition (CC1).
6. Table of Capital Reconciliation (CC2).
7. Table of Key Features of Capital Instrument and TLAC Instrument - Eligible (CCA).
8. Table of Leverage Ratio - Leverage Ratio Compliance Report.
9. Table of Leverage Ratio - Leverage Ratio Calculation Report.

Manajemen Risiko
Risk Management

Dalam menghadapi dinamika bisnis yang semakin kompleks, termasuk transformasi menuju layanan digital, Bank Victoria terus memperkuat sistem manajemen risiko sebagai bagian integral dari tata kelola yang sehat. Pendekatan ini tidak hanya ditujukan untuk memenuhi ketentuan regulator, tetapi juga untuk membangun budaya sadar risiko di seluruh lini organisasi. Melalui identifikasi, pengukuran, pemantauan, dan pengendalian risiko yang menyeluruh, Bank berupaya menjaga kesinambungan operasional, melindungi kepentingan para pemangku kepentingan, serta memastikan pertumbuhan usaha yang stabil dan berkelanjutan di tengah lanskap industri yang terus berkembang.

In facing the increasingly complex business dynamics, including the transformation towards digital services, Bank Victoria continuously strengthens its risk management system as an integral part of the sound governance. This approach is aimed not only at complying with regulatory requirements but also at building a risk-aware culture across the organization. Through comprehensive risk identification, measurement, monitoring, and control, the Bank strives to maintain operational continuity, protect stakeholder interests, and ensure stable and sustainable business growth amidst the ever-evolving industry landscape.

Dasar Penerapan Manajemen Risiko

Penerapan manajemen risiko di Bank dilandaskan pada ketentuan regulator yang berlaku serta panduan *best practice* di industri perbankan. Seluruh kebijakan dan mekanisme pengelolaan risiko disusun dengan mengacu pada sejumlah regulasi berikut:

1. Peraturan Otoritas Jasa Keuangan No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.

2. Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.

Basis of Risk Management Implementation

The Bank's risk management is implemented based on applicable regulatory requirements and best practice guidelines in banking industry. All risk management policies and mechanisms are prepared by referring to the following regulations:

1. Financial Services Authority Regulation No. 4/POJK.03/2016 on Sound Level Assessment for Commercial Banks.
2. Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks.

3. Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum.
4. Peraturan Otoritas Jasa Keuangan No. 22 Tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.
5. Peraturan Otoritas Jasa Keuangan No. 15 Tahun 2024 tentang Integritas Pelaporan Keuangan Bank.
6. Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) Bagi Bank Umum.
7. Peraturan Otoritas Jasa Keuangan No. 20 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) bagi Bank Umum.
8. Peraturan Otoritas Jasa Keuangan No. 13/POJK.03/2020 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 38/POJK.03/2016 tentang Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Bank Umum.
9. Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum.
10. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum.
11. Surat Edaran Otoritas Jasa Keuangan No. 14/SEOJK.03/2017 tentang Penilaian Tingkat Kesehatan Bank Umum.
12. Surat Edaran Otoritas Jasa Keuangan No. 6/SEOJK.03/2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar bagi Bank Umum.
13. Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar bagi Bank Umum.
14. Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2021 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar bagi Bank Umum.
15. Surat Edaran Otoritas Jasa Keuangan No. 21/SEOJK.03/2017 tentang Penerapan Manajemen Risiko dalam Penggunaan Teknologi Informasi oleh Bank Umum.
16. Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam *Banking Book* (*Interest Rate Risk in the Banking Book*) bagi Bank Umum.

3. Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks.
4. Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector.
5. Financial Services Authority Regulation No. 15 of 2024 on Integrity of Financial Reporting of the Bank.
6. Financial Services Authority Regulation No. 19 of 2024 on Amendment to Financial Services Authority Regulation No. 42/POJK.03/2015 on Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks.
7. Financial Services Authority Regulation No. 20 of 2024 on Amendment to Financial Services Authority Regulation No. 50/POJK.03/2017 on Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks.
8. Financial Services Authority Regulation No. 13/POJK.03/2020 on Amendments to Financial Services Authority Regulation No. 38/POJK.03/2016 on Implementation of Risk Management in the Use of Information Technology for Commercial Banks.
9. Financial Services Authority Circular No. 34/SEOJK.03/2016 on Risk Management Implementation for Commercial Banks.
10. Financial Services Authority Circular No. 14/SEOJK.03/2025 on Implementation of Governance for Commercial Banks.
11. Financial Services Authority Circular No. 14/SEOJK.03/2017 on Sound Level Assessment for Commercial Banks.
12. Financial Services Authority Circular No. 6/SEOJK.03/2020 on Calculation of Risk-Weighted Assets for Operational Risk by Using Standardized Approach for Commercial Banks.
13. Financial Services Authority Circular No. 23/SEOJK.03/2022 on Calculation of Risk-Weighted Assets for Market Risk of Commercial Banks.
14. Financial Services Authority Circular No. 24/SEOJK.03/2021 on Calculation of Risk-Weighted Assets for Credit Risk by Using the Standardized Approach for Commercial Banks.
15. Financial Services Authority Circular No. 21/SEOJK.03/2017 on Implementation of Risk Management in the Use of Information Technology for Commercial Banks.
16. Financial Services Authority Circular No. 12/SEOJK.03/2018 on the Implementation of Risk Management and Risk Measurement Using Standardized Approach for Interest Rate Risk in the Banking Book for Commercial Banks.

Penerapan Manajemen Risiko Bank

Bank senantiasa berupaya untuk meningkatkan kualitas implementasi manajemen risiko guna menjadi mitra bisnis yang terpercaya dengan menyediakan kerangka kerja manajemen risiko, mempromosikan *risk culture*, serta menarik talenta untuk mendukung pertumbuhan bisnis yang berkelanjutan. Dalam penerapan manajemen risiko, Bank berpedoman pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, di mana Bank menerapkan manajemen risiko secara efektif melalui 4 (empat) pilar yang terdiri dari:

1. Pengawasan aktif Dewan Komisaris dan Direksi.
2. Kecukupan kebijakan, prosedur, dan penetapan limit manajemen risiko.
3. Kecukupan proses identifikasi, pengukuran, pemantauan, pengendalian, dan sistem informasi manajemen risiko.
4. Sistem pengendalian internal terhadap penerapan manajemen risiko.

Pengawasan Aktif Dewan Komisaris dan Direksi

Tata kelola manajemen risiko senantiasa mengacu pada Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, Dewan Komisaris dan Direksi secara aktif melakukan pengawasan dan mitigasi serta mengembangkan budaya manajemen risiko di Bank. Adapun tugas dan tanggung jawab Dewan Komisaris sebagai berikut:

1. Menetapkan tugas dan wewenang setiap anggota Direksi sebagaimana isi Anggaran Dasar Bank.
2. Memberikan pengesahan tentang arah kebijakan, strategi usaha dari Rencana Bisnis Bank (RBB) dan Rencana Aksi Keuangan Berkelanjutan (RAKB) baik rencana jangka pendek, jangka menengah, maupun jangka panjang.
3. Melakukan pengawasan atas pelaksanaan maupun pencapaian RBB dan RAKB.
4. Memberikan keputusan tertulis disertai dengan alasan-alasan atas transaksi-transaksi yang diusulkan yang melampaui batas wewenang Direksi.
5. Menyetujui dan mengevaluasi kerangka kerja manajemen risiko serta mengevaluasi pertanggungjawaban pelaksanaan manajemen risiko.
6. Melakukan pengawasan atas penerapan kebijakan *country risk* dan *transfer risk* guna memastikan pengelolaan risiko dilakukan secara efektif, terukur, dan selaras dengan ketentuan regulator serta profil risiko Bank. Dalam penerapannya, Bank mengatur dalam Kebijakan *International Banking* mengenai *country rating* untuk eksposur risiko kredit dengan negara lain. Sehubungan dengan eksposur *country risk* dan *transfer*

Implementation of Bank Risk Management

The Bank always strives to improve the quality of risk management implementation to become a trusted business partner by providing risk management framework, promoting risk culture, and attracting talent to support sustainable business growth. In implementing risk management, the Bank refers to the Financial Services Authority Regulation No. 18/POJK.03/2016 on Implementation of Risk Management for Commercial Banks, in which the Bank effectively implements risk management through 4 (four) pillars consisting of:

1. Active monitoring of Board of Commissioners and Board of Directors.
2. Adequacy of risk management policies, procedures, and limit setting.
3. Adequacy of process of risk identification, measurement, monitoring, and managament, as well as risk management information system.
4. Internal control system on risk management implementation.

Active Monitoring of Board of Commissioners and Board of Directors

Risk management governance refers to the Financial Services Authority Regulation No. 17 of 2023 on Implementation of Governance for Commercial Banks, the Board of Commissioners and Board of Directors actively supervise, mitigate, and develop risk management culture within the Bank. Duties and responsibilities of the Board of Commissioners are as follows:

1. Determining duties and authorities of each member of the Board of Directors as stipulated in the Bank's Articles of Association.
2. Approving the policy direction and business strategy of the Bank's Business Plan (RBB) and Sustainable Finance Action Plan (RAKB), including short-term, medium-term, and long-term plans.
3. Supervising the implementation and achievement of RBB and RAKB.
4. Issuing written decisions, accompanied by rationale, for proposed transactions that exceed the Board of Directors' authority.
5. Approving and evaluating risk management framework and evaluating the accountability for risk management implementation.
6. Supervising the implementation of country risk and transfer risk policies to ensure risk management is effective, measurable, and in line with the regulatory requirements and the Bank's risk profile. In its implementation, the Bank regulates the country rating for credit risk exposures with other countries in its International Banking Policy. In relation to insignificant country risk and transfer risk exposures, the Bank

risk yang tidak signifikan, Bank tidak mengatur secara detail mengenai *country risk* dan *transfer risk*. Namun, untuk setiap proposal yang terekspos risiko tersebut akan dibahas secara komprehensif dalam Komite Kredit.

Dewan Komisaris dalam menjalankan fungsinya sebagai pengawasan secara aktif dibantu oleh Komite Audit, Komite Pemantau Risiko, dan Komite Remunerasi dan Nominasi. Sementara itu, tugas dan tanggung jawab Direksi sebagai berikut:

1. Menyusun kebijakan dan strategi manajemen risiko secara tertulis dan komprehensif.
2. Memiliki tanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan.
3. Mengevaluasi dan memutuskan transaksi yang memerlukan persetujuan Direksi.
4. Mengembangkan budaya manajemen risiko pada seluruh jenjang organisasi.
5. Memastikan peningkatan kompetensi HC yang terkait dengan manajemen risiko.
6. Memastikan bahwa fungsi manajemen risiko telah beroperasi secara independen.
7. Menyusun, menetapkan, dan melaksanakan kebijakan pengelolaan risiko, termasuk *country risk* dan *transfer risk*, yang timbul dari aktivitas bisnis. Dalam penerapannya, Bank mengatur dalam Kebijakan International Banking mengenai *country rating* untuk eksposur risiko kredit dengan negara lain. Sehubungan dengan eksposur *country risk* dan *transfer risk* yang tidak signifikan, Bank tidak mengatur secara detail mengenai *country risk* dan *transfer risk*. Namun, untuk setiap proposal yang terekspos risiko tersebut akan dibahas secara komprehensif dalam Komite Kredit.

Direksi dibantu oleh *Executive Committee* terkait Manajemen Risiko, seperti Komite Manajemen Risiko, Komite Kredit, ALCO, Komite Pengarah Teknologi Informasi, Komite Pengadaan, Komite Pemantau dan Pelaksanaan GCG, Komite Personalia, Komite Produk, dan Komite Kebijakan Perkreditan. Penerapan manajemen risiko bukan hanya tanggung jawab Dewan Komisaris dan Direksi, tetapi juga seluruh jenjang organisasi sesuai dengan fungsi dan tanggung jawabnya, serta menganut konsep *Three Lines of Defense*.

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit Manajemen Risiko

Pengelolaan risiko di Bank Victoria didukung dengan kerangka kerja manajemen risiko, yang merupakan kebijakan tertinggi dalam penerapan manajemen risiko di Bank. Kerangka ini disusun sejalan dengan visi, misi, strategi bisnis Bank, *risk appetite*, dan *risk tol*erance, dengan memperhatikan kapasitas modal Bank dalam menyerap eksposur risiko yang mungkin timbul.

does not regulate them in detail. However, each proposal exposed to these risks will be discussed comprehensively by the Credit Committee.

In performing its supervisory function, the Board of Commissioners is actively assisted by the Audit Committee, Risk Monitoring Committee, and Remuneration and Nomination Committee. Meanwhile, duties and responsibilities of the Board of Directors are as follows:

1. Develop written and comprehensive risk management policies and strategies.
2. Is responsible for the implementation of risk management policies and risk exposure taken by the Bank as a whole.
3. Evaluate and decide on transactions requiring approval from the Board of Directors.
4. Develop a risk management culture at all levels of the organization.
5. Ensure increased competency of HC related to risk management.
6. Ensure that the risk management function operates independently.
7. Develop, establish, and implement risk management policies, including country risk and transfer risk, arising from business activities. In its implementation, the Bank regulates the country rating for credit risk exposures with other countries in its International Banking Policy. In relation to insignificant country risk and transfer risk exposures, the Bank does not regulate them in detail. However, each proposal exposed to country risk and transfer risk will be discussed comprehensively by the Credit Committee.

The Board of Directors is assisted by an Executive Committee related to Risk Management, such as the Risk Management Committee, Credit Committee, ALCO, Information Technology Steering Committee, Procurement Committee, GCG Monitoring and Implementation Committee, Personnel Committee, Product Committee, and Credit Policy Committee. Risk management implementation is not only the responsibility of the Board of Commissioners and Board of Directors, but also all levels of the organization in accordance with their functions and responsibilities, and adhering to the Three Lines of Defense concept.

Adequacy of Policies, Procedures, and Limit Establishment of Risk Management

Risk management at Bank Victoria is supported by risk management framework, which is the highest policy in implement risk management at the Bank. This framework is prepared in line with the Bank's vision, mission, business strategy, risk appetite, and risk tolerance, with due observance of the Bank's capital capacity in absorbing possible risk exposure.

Sebagai pelengkap dari kerangka manajemen risiko, Bank juga menyusun kebijakan dan prosedur penerapan manajemen risiko yang menjadi pedoman tertulis dalam setiap aktivitas fungsional Bank. Kebijakan ini mencakup pengaturan mengenai penetapan limit risiko, baik pada level portofolio maupun transaksional guna memastikan pengelolaan risiko yang efektif dan selaras dengan standar perbankan yang berlaku. Seluruh kebijakan dan prosedur di Bank merupakan bentuk pengelolaan risiko yang melekat pada setiap aktivitas operasional di Bank yang dikinikan secara berkala dengan memperhatikan kompleksitas kegiatan usaha, profil risiko, dan keterkaitan antar risiko, serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat.

Dalam rangka pengendalian risiko secara efektif, kebijakan dan prosedur didasarkan pada strategi manajemen risiko dan dilengkapi dengan toleransi risiko dan limit risiko. Penetapan toleransi dan limit risiko telah memperhatikan tingkat risiko yang akan diambil dan strategi secara keseluruhan. Perihal penetapan limit didasarkan atas limit secara keseluruhan, limit per jenis risiko, dan limit per aktivitas fungsional tertentu yang memiliki eksposur risiko disesuaikan dengan kompleksitas dan usaha Bank serta kepatuhan terhadap ketentuan yang berlaku. Sedangkan, dalam penyusunan dan pengajuan limit diusulkan oleh unit kerja (*risk taking unit*) dan disampaikan kepada Satuan Kerja Manajemen Risiko untuk dievaluasi dan diajukan kepada Komite Manajemen Risiko atau ALCO. Selanjutnya, toleransi dan limit risiko direkomendasikan kepada Direktur Utama untuk mendapatkan persetujuan dengan sepengetahuan Dewan Komisaris.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, Pengendalian, dan Sistem Informasi Manajemen Risiko

Proses manajemen risiko meliputi tahapan berikut:

1. Identifikasi
   Identifikasi risiko merupakan proses untuk menentukan risiko yang melekat pada aktivitas Bank berpotensi menghambat pencapaian tujuan. Identifikasi risiko Bank dilakukan melalui analisis terhadap seluruh jenis risiko, terutama kompleksitas dan karakteristik risiko yang melekat yang berpotensi merugikan Bank.

2. Pengukuran
   Tujuan pengukuran risiko adalah untuk mengukur tingkat risiko yang melekat pada aktivitas Bank dan dampaknya terhadap permodalan, pendapatan, dan/atau strategi Bank. Pengukuran risiko Bank dilakukan secara berkala, baik untuk produk dan portofolio maupun seluruh aktivitas bisnis Bank yang bertujuan untuk mengukur eksposur risiko Bank sebagai acuan di dalam pengendalian risiko.

As a complement to the risk management framework, the Bank also prepares policies and procedures for implementing risk management that serve as written guidelines in every functional activity of the Bank. These policies include regulations regarding the determination of risk limits, both at portfolio and transactional levels to ensure an effective risk management and to comply with the applicable banking standards. All policies and procedures at the Bank are a form of risk management inherent in every operational activity at the Bank, updated periodically by considering the complexity of business activities, risk profile, interrelationship between risks, and regulations set by the authorities, and/or sound banking practices.

To control risk effectively, policies and procedures are based on risk management strategies and equipped with risk tolerances and risk limits. Determination of risk tolerance and limits has considered the risk appetite and overall strategy. Limits are determined based on overall limits, limits per type of risk, and limits per certain functional activities that have risk exposure adjusted to the Bank's complexity and business as well as compliance with applicable regulations. Whereas, limits are prepared and proposed by risk taking unit and submitted to the Risk Management Work Unit to be evaluated and proposed to the Risk Management Committee or ALCO. Furthermore, risk tolerance and risk limits are recommended to the President Director for approval under acknowledgment of the Board of Commissioners.

Adequacy of Identification, Measurement, Monitoring, and Control Processes, as well as Risk Management Information System

The risk management process includes the following stages:

1. Identification
   Risk identification is a process to determine inherent risks within the Bank's activities with potential to hinder the achievement of the Bank's objectives. The Bank's risk identification is carried out through the analysis of all types of risk, particularly the complexity and characteristics of inherent risks that may potentially harm the Bank.
2. Measurement
   The risk measurement is aimed to measure the level of inherent risk within the Bank's activities and its impact on the Bank's capital, income, and/or strategy. The Bank's risk measurement is carried out periodically, either for products or portfolios or all business activities intended to measure the Bank's risk exposure as a reference in risk control.

Pengukuran risiko dilakukan baik dalam kondisi normal maupun kondisi stres (*stress condition*) sehingga dapat memberikan gambaran yang lengkap tentang besaran risiko yang dihadapi Bank dalam berbagai skenario.

3. Pemantauan
   Pemantauan risiko adalah proses untuk mengetahui, mengevaluasi potensi tingkat risiko dan efektivitas respons yang dijalankan di Bank. Pemantauan risiko Bank antara lain mencakup besarnya eksposur risiko, toleransi risiko, kepatuhan limit internal, hasil *stress testing*, dan konsistensi pelaksanaan dengan kebijakan dan prosedur yang ditetapkan dan peraturan terkait eksternal lainnya. Pemantauan didukung oleh sistem informasi manajemen risiko dan disesuaikan dengan kebutuhan dalam rangka penerapan manajemen risiko yang efektif.
4. Pengendalian
   Pengendalian risiko adalah metode yang digunakan Bank untuk mengevaluasi potensi kerugian dan tindakan yang dilakukan untuk menerima, mengurangi, mengalihkan, atau menghilangkan risiko. Pengendalian risiko Bank dilakukan antara lain dengan memberikan tindak lanjut atas risiko yang bersifat material dan signifikan, pengawasan melekat, dan pelaksanaan audit internal secara berkala.

Penerapan proses manajemen risiko didukung oleh sistem informasi yang memadai dan dikembangkan sesuai dengan kebutuhan Bank dalam rangka penerapan manajemen risiko yang efektif. Sistem informasi manajemen risiko dan informasi yang dihasilkan disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank, serta adaptif terhadap perubahan.

Sistem Pengendalian Internal terhadap Penerapan Manajemen Risiko

Penerapan manajemen risiko yang efektif dilengkapi dengan sistem pengendalian internal yang andal. Hal-hal yang perlu diperhatikan paling sedikit mampu secara tepat waktu mendeteksi kelemahan dan penyimpangan yang terjadi, dengan mengacu pada kebijakan dan prosedur yang telah ditetapkan, penerapan prinsip penerapan fungsi (*four eyes' principles*), dan *check and balance* harus memadai dan dilaksanakan secara konsisten.

Sistem pengendalian internal dalam penerapan manajemen risiko sekurang-kurangnya mencakup:

1. Pengelolaan dan pengendalian risiko yang melekat pada kegiatan usaha Bank.
2. Pelaporan keuangan dan kegiatan operasional yang akurat dan tepat waktu.
3. Peningkatan kepatuhan terhadap ketentuan yang berlaku.
4. Pengurangan dampak kerugian keuangan, penyimpangan termasuk kecurangan (*fraud*), dan pelanggaran.

Risk measurement is carried out under both normal and stress conditions to provide a comprehensive picture of the magnitude of the risk faced by the Bank in various scenarios.

3. Monitoring
   Risk monitoring is a process for finding out, evaluating the level of potential risk, and effectiveness of responses carried out at the Bank. The Bank's risk monitoring includes the magnitude of risk exposure, risk tolerance, internal limit compliance, stress testing results, and consistent implementation with the established policies, procedures, and other external related regulations. Monitoring is supported by the risk management information system, which is tailored to needs in order to implement effective risk management.
4. Control
   Risk control is the method used by the Bank to evaluate potential loss and actions to be taken to accept, reduce, transfer, or eliminate risks. The risk control of the Bank is carried out by following up on material and significant risks, attached monitoring, and conducting internal audits periodically.

The risk management process is supported by information system that is adequate and developed in accordance with the Bank's needs in order to implement effective risk management. The risk management information system and the information generated are adapted to the characteristics and complexity of the Bank's business activities, as well as adaptive to changes.

Internal Control System on Risk Management Implementation

The effective risk management implementation is complemented by a reliable internal control system. The matters that need to be paid attention to are at least the ability to promptly detect weaknesses and irregularities that arise, in accordance with the established policies and procedures, the application of four eyes principle, and the adequate check and balance that is implemented consistently.

The internal control system in implementing risk management must at least include:

1. Managing and controlling risk inherent in the Bank's business activities.
2. Accurate and timely reporting of financial and operational activities.
3. Improving compliance with applicable regulations.
4. Reducing the impact of financial loss, irregularities including fraud, and violation.

5. Peningkatan efektivitas organisasi dan meningkatkan efisiensi biaya.
6. Pengelolaan risiko agar tetap dalam batas toleransi (*risk tolerance*) dan *risk appetite* sesuai ukuran dan kompleksitas usaha.
7. Pengkajian ulang terhadap sistem informasi manajemen risiko.
8. Verifikasi dan pengkajian ulang secara berkala dan berkesinambungan terhadap permasalahan yang bersifat material dan tindakan untuk memperbaiki permasalahan yang terjadi.

Evaluasi terhadap efektivitas penerapan sistem pengendalian internal dilakukan secara terus menerus dan berkesinambungan agar Bank dapat memantau dan memitigasi risiko-risiko yang dihadapi secara efektif. Hasil evaluasi tersebut dijadikan dasar untuk perbaikan dan penyempurnaan sistem ataupun kebijakan pengendalian internal.

Strategi Penerapan Manajemen Risiko

Strategi manajemen risiko Bank disusun dengan menetapkan *risk appetite* dan *risk tolerance* yang jelas, mencerminkan keseimbangan antara risiko dan pengembalian. Strategi ini diterapkan melalui tahapan identifikasi, pengukuran, pemantauan, dan pengendalian risiko, serta melalui pengaturan tata kelola risiko yang efektif. Bank menerapkan strategi manajemen risiko dengan orientasi jangka panjang guna memastikan kelangsungan bisnis, menghasilkan laba yang berkelanjutan, dan menciptakan nilai bagi seluruh pemangku kepentingan. Penyusunan strategi ini mempertimbangkan berbagai faktor internal dan eksternal yang dapat memengaruhi operasional Bank.

Sebagai bagian dari rencana bisnis Bank, strategi manajemen risiko harus dikomunikasikan secara efektif oleh Direksi kepada seluruh karyawan agar dapat dipahami dan diimplementasikan dengan baik. Direksi juga melakukan pengkajian berkala terhadap strategi manajemen risiko, termasuk dampaknya terhadap kinerja keuangan, serta melakukan penyesuaian strategi bila diperlukan.

Penyusunan strategi manajemen risiko didasarkan pada prinsip-prinsip risiko, yang mencakup pernyataan (*statement*) mengenai pendekatan manajemen risiko dan budaya risiko yang ingin dipertahankan oleh Bank. Selain itu, strategi ini juga memastikan bahwa Bank dapat mencapai tujuan bisnisnya secara konsisten, menghasilkan keuntungan yang berkelanjutan, serta memaksimalkan kepentingan para pemangku kepentingan.

5. Improving organization effectiveness and improving cost efficiency.
6. Managing risk in order to remain within the limits of risk tolerance and risk appetite according to the business size and complexity.
7. Reviewing the risk management information system.
8. Verifying and reviewing material problems and actions to rectify occurring problems, periodically and continuously.

Evaluation of the effectiveness of internal control system is performed continuously and ongoing so that the Bank can monitor and mitigate the risks effectively. Such evaluation result is used as a basis for improving and refining the system and internal control policy.

Risk Management Implementation Strategy

The Bank's risk management strategy is prepared by establishing a clear risk appetite and risk tolerance, reflecting the balance between risk and return. This strategy is implemented through the stages of risk identification, measurement, monitoring, and control, as well as through effective risk governance arrangements. The Bank implements risk management strategy with a long-term orientation to ensure business sustainability, generate sustainable profits, and create value for all stakeholders. This strategy is prepared by considering various internal and external factors that may affect the Bank's operations.

As part of the Bank's business plan, the risk management strategy must be communicated effectively by the Board of Directors to all employees for it to be understood and implemented properly. The Board of Directors also regularly reviews the risk management strategy, including its impact on financial performance, and makes adjustments to the strategy if necessary.

The risk management strategy is prepared based on risk principles, which include statements on the approach to risk management and risk culture that the Bank wishes to maintain. Furthermore, this strategy also ensures that the Bank can achieve its business objectives consistently, generate sustainable profits, and maximize the interests of stakeholders.

Strategi manajemen risiko senantiasa dilakukan Bank, baik dari segi struktur organisasi dan HC, kebijakan dan prosedur, maupun sistem pendukung agar sesuai dengan perkembangan aktivitas perbankan yang semakin beragam dan kompleks. Usaha tersebut dilakukan Bank agar dapat mengelola risiko yang dihadapi, melakukan upaya pencegahan atau mitigasi, serta mencadangkan modal, sehingga membantu Bank dalam merencanakan arah pertumbuhan bisnis di masa depan. Perbaikan dan peningkatan pengelolaan dilakukan melalui:

1. Menjaga eksposur risiko secara keseluruhan (*aggregate*) maupun per jenis risiko dengan mempertimbangkan keterkaitan antar risiko.
2. Evaluasi dan penyempurnaan pengukuran risiko secara berkala atau sewaktu-waktu apabila diperlukan untuk memastikan kesesuaian akurasi, kewajaran, serta prosedur yang digunakan untuk mengukur risiko.
3. Analisa dan evaluasi kecenderungan terhadap perubahan faktor-faktor yang memengaruhi kinerja Bank, baik faktor internal maupun eksternal.

Pada prinsipnya, pengelolaan risiko dilakukan secara proaktif guna mencapai pertumbuhan kinerja keuangan maupun kelangsungan bisnis Bank yang sehat dan berkelanjutan serta memelihara tingkat *risk adjusted return* secara optimal sesuai dengan *risk appetite* yang ditetapkan.

Struktur Tata Kelola Risiko

Dalam rangka penerapan tata kelola manajemen risiko, Bank menetapkan tugas dan tanggung jawab Dewan Komisaris, Direksi, dan berbagai komite yang dibentuk sesuai dengan ketentuan regulator dan tingkat kompleksitas Bank. Adapun tugas dan tanggung jawabnya sebagai berikut:

1. Dewan Komisaris
   a. Mengevaluasi dan menyetujui kebijakan manajemen risiko.
   b. Memastikan penerapan manajemen risiko telah memadai dengan karakteristik, kompleksitas usaha, dan profil risiko Bank.
   c. Mengevaluasi pertanggungjawaban Direksi atas pelaksanaan kebijakan manajemen risiko.
   d. Memastikan kebijakan dan proses manajemen risiko dilaksanakan secara efektif dan terintegrasi dalam proses manajemen secara keseluruhan.
2. Direksi
   a. Menyusun kebijakan dan strategi manajemen risiko secara tertulis dan komprehensif.
   b. Bertanggung jawab atas pelaksanaan kebijakan manajemen risiko dan eksposur risiko yang diambil oleh Bank secara keseluruhan.
   c. Menindaklanjuti dan menyampaikan laporan pertanggungjawaban atas pelaksanaan manajemen risiko kepada Dewan Komisaris melalui Komite Pemantau Risiko.

The Bank constantly performs risk management strategy, either on the organizational structure and HC, policy and procedure, or on the supporting system to be in line with the development of banking's activities that are more various and complex. The effort is made by the Bank in order to manage the risks, to prevent and mitigate, and to reserve capital to assist the Bank in planning the future direction of the business growth. Improvement and refinement of risk management are conducted as follows:

1. Maintaining an aggregate risk exposure or per type of risk by considering the interrelationships among the risks.
2. Evaluating and refining the risk measurement on a regular basis or at any time as necessary to ensure conformity of accuracy, reasonableness, and procedures used to measure risks.
3. Analyzing and evaluating trends towards changes in factors affecting the Bank's performance, both internal and external factors.

In principle, risk management is carried out proactively in order to achieve sound and sustainable growth in financial performance and business continuity of the Bank and to maintain an optimal level of risk adjusted return in accordance with the established risk appetite.

Risk Governance Structure

To implement risk management governance, the Bank determines the duties and responsibilities of the Board of Commissioners, Board of Directors, and various committees established in accordance with regulatory requirements and the Bank's level of complexity. The duties and responsibilities are as follows:

1. Board of Commissioners
   a. Evaluating and approving risk management policies.
   b. Ensuring that risk management is implemented adequately with the Bank's characteristics, business complexity, and risk profile.
   c. Evaluating the Board of Directors' accountability for the implementation of risk management policies.
   d. Ensuring that risk management policies and processes are implemented effectively and integrated into the overall management process.
2. Board of Directors
   a. Developing written and comprehensive risk management policies and strategies.
   b. Being responsible for the implementation of risk management policies and risk exposure taken by the Bank as a whole.
   c. Following up and submitting accountability reports on the implementation of risk management to the Board of Commissioners through the Risk Monitoring Committee.

d. Mengembangkan budaya manajemen risiko, termasuk kesadaran risiko di seluruh jenjang organisasi.
e. Memastikan fungsi manajemen risiko telah diterapkan secara independen, yang tercermin dalam pemisahan fungsi antara Satuan Kerja Manajemen Risiko yang melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko, terhadap *risk taking unit* yang menjalankan kegiatan bisnis.

3. Komite Manajemen Risiko merupakan komite eksekutif di bawah Direksi yang bertanggung jawab memastikan efektivitas kerangka kerja manajemen risiko dan implementasinya dalam mendukung strategi bisnis. Komite Manajemen Risiko juga bertanggung jawab untuk mengevaluasi dan merekomendasikan kebijakan manajemen risiko, termasuk strategi, *risk appetite*, toleransi risiko, limit risiko, kerangka kerja manajemen risiko, dan rencana kontingensi untuk mengantisipasi kondisi abnormal, serta memastikan eksposur risiko untuk semua jenis risiko di Bank tetap dalam batas yang sesuai dengan *risk appetite*.
4. Komite Pemantau Risiko bertujuan untuk membantu Dewan Komisaris dalam pemantauan implementasi manajemen risiko dan mengevaluasi pelaksanaan kebijakan manajemen risiko di tingkat eksekutif.
5. Komite Kredit merupakan suatu komite yang beranggotakan pemegang kewenangan kredit/ pemegang kewenangan keputusan kredit, termasuk restrukturisasi kredit yang terdiri dari perwakilan *Business Division, Special Asset Management* (SAM) *Division,* dan *Credit Risk Review Division,* di mana kewenangan pemutusan kredit hanya diberikan kepada individu dengan kapabilitas, kompetensi, dan integritas yang memadai.
6. Komite Kebijakan Perkreditan merupakan komite yang membantu Direksi dalam merumuskan kebijakan perkreditan agar pemberian kredit dilakukan dengan prinsip kehati-hatian, memantau dan mengevaluasi pelaksanaan kebijakan perkreditan, perkembangan portofolio kredit, serta memberikan saran atau solusi sebagai langkah perbaikan. Komite Kebijakan Perkreditan bertanggung jawab atas pengawasan dan persetujuan terkait kebijakan, prosedur, serta parameter risiko kredit.
7. Satuan Kerja Manajemen Risiko merupakan satuan kerja independen dari *risk taking unit* dan unit pengendalian internal yang bertanggung jawab kepada Direktur yang membawahi manajemen risiko.

Informasi lebih rinci terkait Komite Pemantau Risiko, Komite Manajemen Risiko, Komite Kredit, dan Komite Kebijakan Perkreditan telah disampaikan pada bab Tata Kelola Perusahaan dalam Laporan Tahunan ini.

d. Developing risk management culture, including risk awareness at all organizational levels.
e. Ensuring that the risk management function is implemented independently, which is reflected in the separation of functions between the Risk Management Work Unit that identifies, measures, monitors, and controls risks, and the risk taking unit that carries out business activities.

3. Risk Management Committee is an executive committee under the Board of Directors that is responsible for ensuring the effectiveness of risk management framework and implementation in supporting business strategy. Risk Management Committee is also responsible for evaluating and recommending risk management policies, including strategies, risk appetite, risk tolerance, risk limits, risk management framework, and contingency plans to anticipate abnormal conditions, as well as ensuring risk exposure for all types of risk in the Bank remains within limits in accordance with the risk appetite.
4. Risk Monitoring Committee aims to assist the Board of Commissioners in monitoring the risk management implementation and evaluating the implementation of risk management's policies at executive level.
5. Credit Committee is a committee consisting of authority holders of credit/authority holders of credit decision, including credit restructuring which consists of representatives from Business Division, Special Asset Management (SAM) Division, and Credit Risk Review Division, in which the authority to terminate credit is only given to individual with adequate capability, competence, and integrity.
6. Credit Policy Committee is a committee that assists the Board of Directors in formulating credit policies, so as credit provision is carried out with prudential principle, monitoring and evaluating the implementation of credit policies, credit portfolio development, and providing suggestions or solutions as corrective measures. The Credit Policy Committee is responsible for the supervision and approval of policies, procedures, and credit risk parameters.
7. Risk Management Work Unit is an independent work unit of the risk taking unit and internal control unit that is responsible to the Director in charge of risk management.

More detailed information regarding the Risk Monitoring Committee, Risk Management Committee, Credit Committee, and Credit Policy Committee is presented in the Corporate Governance chapter of this Annual Report.

Seluruh manajemen dan karyawan Bank Victoria memiliki peran dan tanggung jawab dalam penerapan, kepatuhan, serta peningkatan sistem pengendalian internal di Bank. Hal ini tercermin dalam konsep *Three Lines of Defenses*, yang telah diimplementasikan di seluruh lini organisasi guna memastikan pengelolaan risiko yang efektif dan menyeluruh.

Dalam penerapannya, struktur dengan pembagian tugas dan tanggung jawab dalam proses pengelolaan risiko dibagi menjadi 3 (tiga) yang meliputi:

1. Lini Pertahanan Pertama adalah Unit Pengambil Risiko (*Risk Taking Unit*/RTU) atau unit bisnis dan/atau fungsi terkait yang melakukan atau mendukung aktivitas untuk menghasilkan pendapatan yaitu yang memiliki dan mengelola risiko. Lini ini bertanggung jawab untuk mengidentifikasi, menilai, mengendalikan, memitigasi, memantau, dan melaporkan eksposur risikonya dan memastikan bahwa hal tersebut dalam batasan yang telah ditetapkan dalam strategi risiko, *risk tolerance*, *risk appetite*, serta kerangka kerja, kebijakan, dan prosedur manajemen risiko. Merancang dan melaksanakan aktivitas dan kontrol dalam *end-to-end process*.
2. Lini Pertahanan Kedua adalah fungsi kontrol independen dari Lini Pertama yang mengawasi dan memastikan manajemen risiko berjalan dengan baik untuk memberikan keyakinan pada para-Dewan Manajemen. Lini Kedua memiliki wewenang untuk memberhentikan aktivitas bisnis (dalam cakupan tanggung jawab kontrol mereka) jika risiko tidak sejalan dengan kontrol yang dipersyaratkan atau tidak sejalan dengan *risk appetite*.
3. Lini Pertahanan Ketiga adalah fungsi independen yang memberikan jaminan independensi atas keefektifan kontrol yang mendukung manajemen risiko Lini Pertama dari aktivitas bisnis, dan proses yang dilakukan oleh Lini Kedua. Fungsi Lini Pertahanan Ketiga dilakukan oleh SKAI.

Bank secara berkala melakukan kaji ulang dan evaluasi terhadap unit kerja guna mengidentifikasi setiap risiko potensial yang dapat berdampak signifikan terhadap operasional Bank. Evaluasi ini bertujuan untuk memastikan bahwa manajemen risiko diterapkan secara efektif dan selaras dengan perkembangan bisnis serta regulasi yang berlaku.

Proses evaluasi pelaksanaan manajemen risiko menggunakan pendekatan berbasis risiko (*risk-based approach)* dan dilakukan oleh *Risk Management* dengan bekerja sama dengan seluruh unit kerja terkait. Hasil evaluasi ini kemudian ditinjau dan dikomunikasikan melalui berbagai rapat berkala, termasuk rapat Komite Manajemen Risiko, guna memastikan bahwa strategi pengelolaan risiko tetap optimal dan dapat mendukung keberlanjutan bisnis Bank.

All management and employees of Bank Victoria have roles and responsibilities in the implementation, compliance, and improvement of the internal control system at the Bank. This is reflected in the Three Lines of Defenses concept, which has been implemented across all lines of the organization to ensure an effective and comprehensive risk management.

In its application, the structure and division of tasks and responsibilities in risk management process are divided into 3 (three) which include:

1. The First Line of Defense is Risk Taking Unit (RTU) or business unit and/or related function that conducts or supports income-generating activities that own and manage risks. This line is responsible for identifying, assessing, controlling, mitigating, monitoring, and reporting risk exposures, as well as ensuring that such matters are within the limits set in risk strategy, risk tolerance, risk appetite, and risk management framework, policies, and procedures. This line is also designing and implementing activities and controls across in end-to-end processes.
2. The Second Line of Defense is an independent control function from the First Line of Defense that oversees and ensures that risk management is carried out properly and provides confidence to the Board of Management. The Second Line of Defense has the authority to terminate business activities (within its control responsibilities) if the risks are not in line with the required controls or not in line with the risk appetite.
3. The Third Line of Defense is an independent function that provides independent assurance on the effectiveness of controls, supporting the First Line of Defense's risk management within business activities, and processes carried out by the Second Line of Defense. The Third Line of Defense's function is performed by SKAI.

The Bank periodically reviews and evaluates the work units to identify any potential risks that could have a significant impact on the Bank's operations. This evaluation aims to ensure that risk management is implemented effectively and in line with business developments and applicable regulations.

The risk management evaluation process uses risk-based approach and is performed by Risk Management, in coordination with all relevant work units. The results of this evaluation are then reviewed and communicated through various periodic meetings, including Risk Management Committee's meetings, to ensure that the risk management strategy remains optimal and can support the Bank's business sustainability.

Stress Test

Stress test adalah teknik yang digunakan oleh Bank Victoria untuk kerentanan Bank terhadap kejadian di luar aktivitas bisnis normal, namun tetap masuk akal. *Stress test* dirancang untuk menilai dampak dari peristiwa luar biasa dengan kemungkinan kejadian rendah tetapi berisiko tinggi. Tujuan dari *stress test* antara lain:

1. Mengelola portofolio agar tidak terjadi konsentrasi risiko yang terlalu tinggi, yang dapat menyebabkan kerugian besar pada kondisi skenario ekstrem tetapi mungkin terjadi.
2. Memastikan sumber daya keuangan Bank cukup untuk bertahan dalam skenario yang parah tetapi masuk akal.
3. Memiliki fleksibilitas finansial untuk menghadapi skenario ekstrem tetapi mungkin terjadi.
4. Memahami risiko model bisnis utama, mengidentifikasi peristiwa ekstrem yang dapat berdampak pada Bank, serta menentukan tindak lanjut untuk mengurangi kemungkinan dan/atau dampaknya.

Stress test digunakan sebagai alat untuk menilai kemampuan Bank dalam menyerap potensi risiko atas memburuknya kondisi ekonomi, seperti resesi, krisis pasar keuangan, atau peristiwa risiko spesifik yang terjadi di Bank. Analisis dilakukan dengan menggunakan skenario hipotetis atau analisis sensitivitas untuk menentukan apakah Bank memiliki kapasitas yang cukup dalam menghadapi kondisi merugikan Bank. Hasil dari *stress test* ini harus terdokumentasikan dengan jelas.

Jenis *stress test* yang dilakukan Bank Victoria sebagai berikut:

1. Analisa sensitivitas, menilai pengaruh perubahan 1 (satu) faktor risiko atau variabel terhadap portofolio pada waktu tertentu, dengan asumsi faktor risiko lainnya tetap.
2. Analisa skenario, mengubah beberapa faktor risiko berdasarkan skenario yang dibangun atau ditentukan. Skenario dapat berbasis:
   a. Skenario hipotesis, merupakan skenario yang dibangun dengan menyimulasikan kejadian yang mungkin terjadi di masa depan tetapi belum pernah terjadi sebelumnya.
   b. Skenario historis, merupakan skenario *stress* yang dibangun dengan merekonstruksikan kejadian krisis yang pernah terjadi di masa lalu dengan pendekatan yang lebih objektif.

Stress test dilakukan dengan berbagai asumsi skenario serta *action plan/remedial action* terkait risiko kredit, pasar, dan likuiditas. Bank Victoria merancang skenario *stress test* dalam berbagai tingkatan berdasarkan intensitas stres berikut:

1. Makro ekonomi, merupakan suatu skenario yang mempertimbangkan faktor-faktor utama makro ekonomi, seperti pertumbuhan produk domestik bruto,

Stress Test

Stress test is a technique used by Bank Victoria to assess the Bank's vulnerability to events outside of normal business activities, while remaining reasonable. Stress test is designed to assess the impact of extraordinary event with a low probability but high risk event. The purposes of stress tests are among others:

1. Managing the portfolio so that there is no excessive concentration of risk, which can cause large loss in extreme but possible scenarios.
2. Ensuring the Bank's financial resources are sufficient to survive severe but reasonable scenario.
3. Having financial flexibility to face extreme but possible scenario.
4. Understanding the risks of main business model, identifying extreme events that can impact the Bank, and determining follow-up actions to reduce the likelihood and/or impact.

Stress test is used as a tool to assess the Bank's ability to absorb potential risks from worsening economic conditions, such as recession, financial market crises, or specific risk events that occur in the Bank. The analysis is carried out by using hypothetical scenario or sensitivity analysis to determine whether the Bank has sufficient capacity to face adverse conditions for the Bank. The results of this stress test must be clearly documented.

The types of stress test conducted by Bank Victoria are as follows:

1. Sensitivity analysis, assessing the impact of changes in 1 (one) risk factor or variable on the portfolio at a certain time, assuming other risk factors remain constant.
2. Scenario analysis, changing several risk factors based on scenarios that are built or determined. Scenario may be based on:
   a. Hypothetical scenario, is scenario built by simulating events that may occur in the future but have never happened before.
   b. Historical scenario, is stress scenario built by reconstructing crisis events that have occurred in the past with a more objective approach.

Stress test is conducted with various scenario assumptions and action plans/remedial actions related to credit, market, and liquidity risks. Bank Victoria designs stress test scenarios at various levels based on the following stress intensity:

1. Macroeconomic, is a scenario that considers the main macroeconomic factors, such as gross domestic product growth, exchange rates, sovereign ratings, cost

nilai tukar, *sovereign rating,* biaya dana, suku bunga *overnight*, inflasi, dan imbal hasil obligasi. Jenis skenario ini paling umum digunakan *stress test*.
2. Sistemik (*market-wide*), merupakan suatu skenario yang mempertimbangkan dampak sistemik dari peristiwa ekonomi, masalah keuangan, atau kejadian katastropis lainnya baik di dalam maupun di luar negeri yang mungkin memengaruhi Bank.
3. *Idiosyncratic*, merupakan suatu skenario yang mempertimbangkan peristiwa khusus yang hanya berdampak pada Bank Victoria, seperti *cyber risk*, kerugian besar dalam *trading*, atau kasus *fraud* yang berskala besar.
4. Gabungan, merupakan suatu skenario yang mencakup kombinasi antara skenario makro ekonomi dan skenario *idiosyncratic*.
5. *Reverse stress test*, merupakan suatu skenario yang mengasumsikan tingkat modal dan likuiditas Bank berada di bawah ketentuan minimum regulator, sehingga dapat membantu dalam mengantisipasi kemungkinan terburuk.

of funds, overnight interest rates, inflation, and bond yields. This type of scenario is the most commonly used stress test.
2. Systemic (market-wide), is a scenario that considers the systemic impact of economic events, financial problems, or other catastrophic events both at home and abroad that may affect the Bank.
3. Idiosyncratic, is a scenario that considers specific events that only impact Bank Victoria, such as cyber risk, major trading losses, or large-scale fraud cases.
4. Combined, is a scenario that includes a combination of macroeconomic scenario and idiosyncratic scenario.
5. Reverse stress test, is a scenario that assumes the Bank's capital and liquidity levels are below the minimum regulatory requirements, so that it can help anticipate the worst possibilities.

Satuan Kerja Manajemen Risiko

Satuan Kerja Manajemen Risiko merupakan satuan kerja independen terhadap satuan kerja operasional dan satuan kerja yang melaksanakan fungsi pengendalian internal. Satuan Kerja Manajemen Risiko dipimpin oleh seorang Kepala Divisi dan bertanggung jawab langsung kepada Direktur Kepatuhan dan Manajemen Risiko. Satuan Kerja Manajemen Risiko bekerja sama dengan seluruh unit bisnis dan unit pendukung untuk membangun secara komprehensif dalam melakukan proses identifikasi, pengukuran, pemantauan, pengendalian risiko dan sistem informasi. Satuan Kerja Manajemen Risiko menjadi mitra strategis dari unit-unit bisnis guna mengoptimalkan pendapatan dan meminimalisir potensi kerugian dari aktivitas fungsional operasional Bank.

Pedoman Satuan Kerja Manajemen Risiko

Pelaksanaan tugas Satuan Kerja Manajemen Risiko berpedoman pada Kebijakan Manajemen Risiko (Kebijakan Utama Kerangka Kerja Manajemen Risiko) yang dikinikan tanggal 6 Maret 2025.

Tugas dan Tanggung Jawab Satuan Kerja Manajemen Risiko

Satuan Kerja Manajemen Risiko memiliki tugas dan tanggung jawab sebagai berikut:
1. Sebagai pemilik proses penyusunan *Risk Type Framework* (RTF), strategi, kebijakan dan prosedur, serta memantau efektivitas penerapan RTF.
2. Mengawasi dan menguji aktivitas pengambilan risiko dan rencana remediasi risiko yang dibuat oleh Lini Pertama termasuk aktivitas dan/atau produk baru. Membuat

Risk Management Work Unit

The Risk Management Work Unit is an independent work unit against operational work units and a work unit performing internal control functions. The Risk Management Work Unit is led by a Division Head who is directly responsible to the Director of Compliance and Risk Management. The Risk Management Work Unit partners with all business units and supporting units to build a comprehensive process of identification, measurement, monitoring, and control of risk, as well as information systems. The Risk Management Work Unit becomes a strategic partner of the business units to optimize revenue and minimize potential losses from the Bank's functional and operational activities.

Risk Management Work Unit Guidelines

The Risk Management Work Unit's duty implementation is guided by the Risk Management Policy (Main Risk Management Framework Policy), updated on 6 March 2025.

Duties and Responsibilities of Risk Management Work Unit

The Risk Management Work Unit has the following duties and responsibilities:
1. Acting as the owner of the process for preparing Risk Type Framework (RTF), strategies, policies and procedures, and monitors the effectiveness of RTF implementation.
2. Supervising and examining risk taking activities and risk remediation plans created by the First Line, including new activities and/or products. Making

rekomendasi atau keputusan untuk menyetujui atau menolak aktivitas/produk sesuai kebutuhan.
3. Memiliki dan mengelola proses pengawasan dan pengujian.
4. Memastikan tingkat risiko selalu sejalan dengan risk appetite dan toleransi risiko melalui pengukuran risiko, penilaian, serta *stress testing*.
5. Mengevaluasi keakuratan model dan validitas data yang digunakan untuk proses pengukuran risiko.
6. Merancang laporan informasi risiko yang efektif dan tepat waktu untuk mendukung keputusan manajemen.
7. Memastikan pemenuhan kepatuhan peraturan di risiko terkait.
8. Mengembangkan budaya risiko yang sehat dan kuat.
9. Memastikan kecukupan sumber daya manusia, sistem, dan infrastruktur lainnya dalam pengelolaan risiko.
10. Memberikan penilaian risiko *forward-looking*.

recommendations or decisions to approve or reject activities/products as necessary.
3. Establishing and managing the supervisory and testing process.
4. Ensuring that risk levels are consistently in line with risk appetite and risk tolerance through risk measurement, assessment, and stress testing.
5. Evaluating the model accuracy and validity of data used in the risk assessment process.
6. Designing effective and timely risk information reports to support management decisions.
7. Ensuring regulatory compliance with related risks.
8. Developing a healthy and robust risk culture.
9. Ensuring the adequacy of human capital, system, and other infrastructure for risk management.
10. Providing forward-looking risk assessments.

Profil Kepala Divisi Satuan Kerja Manajemen Risiko
Profile of Head of Risk Management Work Unit Division

SAM R. SOELAEMAN

Kepala Divisi Satuan Kerja Manajemen Risiko

Head of Risk Management Work Unit Division

Kewarganegaraan / Nationality
Indonesia / Indonesian

Tempat Lahir / Place of Birth
Cianjur

Usia / Age
60 tahun / years old

Domisili / Domicile
Bogor

Dasar Pengangkatan dan Periode Menjabat
Keputusan Direksi No. 001/SK-DIR/HCM/08/23 tanggal 1 Agustus 2023.

Riwayat Pendidikan
Magister Manajemen dari Universitas Pancasila Jakarta (2003).

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

Di luar Bank Victoria:
Tidak ada.

Riwayat Jabatan Sebelumnya
Memiliki pengalaman kerja dalam industri perbankan sejak tahun 1990 dan memegang beberapa posisi penting di antaranya:
- *Forex Trader* PT ASEAM Indonesia (1990-1992).
- *Treasury* PT Bank Rama (1992-2001).
- Pemeriksa *Specialist Treasury* dan Manajemen Risiko Bank Indonesia (2001-2004).
- *Head of Market, Liquidity, & Treasury Credit Risk Management* PT Bank Maybank Indonesia Tbk (2005-2022).

Sertifikasi
- *International Certificate in Banking Risk and Regulation* (ICBRR) dari Global Association of Risk Professional - Badan Sertifikasi Manajemen Risiko (GARP-BSMR) (2009).
- Sertifikasi Manajemen Risiko Jenjang 7 dari Lembaga Sertifikasi Profesi Perbankan (2025-2028).
- Sertifikat Kompetensi Asesor untuk Manajemen Risiko Perbankan (2025-2028).

Hubungan Afiliasi
Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi, serta Pemegang Saham Utama dan Pengendali.

Basis of Appointment and Term of Office
Board of Directors' Decision No. 001/SK-DIR/HCM/08/23 dated 1 August 2023.

Education
Master of Management from Pancasila Jakarta University (2003).

Current Concurrent Positions
In Bank Victoria:
None.

Outside of Bank Victoria:
None.

History of Previous Positions
Has work experience in banking industry since 1990 and has held several important positions including:
- Forex Trader at PT ASEAM Indonesia (1990-1992).
- Treasury at PT Bank Rama (1992-2001).
- Treasury and Risk Management Specialist Examiner at Bank Indonesia (2001-2004).
- Head of Market, Liquidity, & Treasury Credit Risk Management at PT Bank Maybank Indonesia Tbk (2005-2022).

Certification
- International Certificate in Banking Risk and Regulation (ICBRR) from the Global Association of Risk Professional – Risk Management Certification Agency (GARPBSMR) (2009).
- Risk Management Certification Level 7 from Banking Professional Certification Institute (2025-2028).
- Assessor Competency Certificate for Banking Risk Management (2025-2028).

Affiliation Relationship
Does not have any affiliation with members of Board of Commissioners, members of Board of Directors, and Main and Controlling Shareholders.

Laporan Singkat Pelaksanaan Kegiatan Tugas Satuan Kerja Manajemen Risiko Tahun 2025

Selama tahun 2025, Satuan Kerja Manajemen Risiko telah menjalankan berbagai inisiatif sebagai bagian dari komitmennya dalam memastikan pengelolaan risiko yang efektif di seluruh lini kegiatan usaha. Adapun sejumlah aktivitas yang telah dilakukan sepanjang tahun berjalan, antara lain:

1. Memantau eskposur risiko serta kepatuhan terhadap toleransi risiko dan limit yang telah ditetapkan, baik melalui laporan maupun Komite Manajemen Risiko, serta melakukan *stress testing*.
2. Melakukan kajian terhadap usulan penyelenggaran produk baru Bank.
3. Membuat beberapa kebijakan baru terkait risiko kredit, risiko pasar, dan risiko likuiditas.
4. Mengembangkan sistem pengelolaan risiko pasar dan risiko likuiditas guna meningkatkan efektivitas manajemen risiko.
5. Menyusun penginian rencana aksi pemulihan (*recovery plan*) Bank untuk mengantisipasi potensi gangguan terhadap stabilitas keuangan Bank.
6. Menyusun kebijakan dan laporan terkait *climate risk stress testing*.
7. Melakukan kajian terhadap kebijakan dan prosedur Bank guna memastikan efektivitas dan kepatuhan terhadap regulasi yang berlaku.
8. Menyusun dan menyampaikan laporan terkait manajemen risiko sesuai dengan ketentuan yang berlaku, baik kepada pihak internal maupun regulator secara berkala.

Pelatihan dan/atau Peningkatan Satuan Kerja Manajemen Risiko

Pada tahun 2025, Satuan Kerja Manajemen Risiko aktif mengikuti berbagai program pengembangan kapasitas, baik melalui pelatihan internal maupun eksternal. Secara keseluruhan, kegiatan peningkatan kompetensi telah dilaksanakan sebanyak 26 kali, dengan cakupan materi yang meliputi antara lain:

1. *Innovative credit scoring* dalam meningkatkan kualitas dan inklusi kredit dan pengembangan model *credit scoring* untuk konsumen asuransi jiwa.
2. *Training advanced artificial intelligence frameworks for holistic risk mitigation*.
3. *Training cyber shield summit 2025*.
4. *Training Internal Liquidity Adequacy Assessment Process* (ILAAP).
5. *Training* Aset Tertimbang Menurut Risiko (ATMR) risiko kredit dan risiko operasional.
6. *Training Refreshment Financial Integrity Rating* (FIR) 2025 dan tindak pidana pencucian uang pidana pencucian uang.
7. *Training expert sharing session* "transformasi digital IT perbankan".

Brief Report on the Implementation of Risk Management Work Unit Duties in 2025

Throughout 2025, the Risk Management Work Unit carried out various initiatives as part of its commitment to ensuring effective risk management across all business lines. Several activities carried out throughout the year included:

1. Monitoring risk exposure and compliance with the established risk tolerances and limits, either through reports and Risk Management Committee, or conducting stress testing.
2. Reviewing the proposed new products of the Bank.
3. Creating several new policies related to credit risk, market risk, and liquidity risk.
4. Developing market risk and liquidity risk management system to improve the effectiveness of risk management.
5. Preparing an update of the Bank's recovery plan to anticipate potential disruptions to the Bank's financial stability.
6. Preparing policies and reports related to climate risk stress testing.
7. Reviewing the Bank's policies and procedures to ensure effectiveness and compliance with the applicable regulations.
8. Preparing and submitting reports related to risk management in accordance with the applicable provisions, both to internal parties and regulators, on a regular basis.

Risk Management Work Unit Training and/or Development Programs

In 2025, the Risk Management Work Unit actively attended various capacity development programs, both through internal and external training. Overall, 26 competency development activities were carried out, with materials coverage including the following matters:

1. Innovative credit scoring in improving credit quality and inclusion and developing model credit scoring for consumers' life insurance.
2. Training advanced artificial intelligence frameworks for holistic risk mitigation.
3. Training cyber shield summit 2025.
4. Training Internal Liquidity Adequacy Assessment Process (ILAAP).
5. Risk Weighted Assets (RWA) training for credit risk and operational risk.
6. Training Refreshment Financial Integrity Rating (FIR) 2025 and money laundering crimes.
7. Training expert sharing session on "digital transformation of banking IT" training.

8. *Training Interest Rate Risk in the Banking Book* (IRRBB).
9. *Training driving branch productivity through effective leadership - batch 1.*
10. *Training IT risk management.*

Sertifikasi Manajemen Risiko

Dalam upaya memperkuat kapasitas pengelolaan risiko di tingkat strategis, Bank Victoria mendorong partisipasi aktif jajaran manajemen dalam program sertifikasi manajemen risiko. Sertifikasi ini menjadi landasan penting untuk menghadapi tantangan risiko yang terus berkembang di sektor perbankan. Sebagai bentuk komitmen terhadap pengelolaan risiko yang adaptif, Bank juga mengadakan pelatihan lanjutan secara berkala bagi manajemen yang telah tersertifikasi. Adapun rincian sertifikasi yang dimiliki oleh jajaran manajemen pada tahun 2025 sebagai berikut:

8. Training Interest Rate Risk in the Banking Book (IRRBB).
9. Training driving branch productivity through effective leadership - batch 1.
10. Training IT risk management.

Risk Management Certification

In an effort to strengthen risk management capacity at the strategic level, Bank Victoria encourages active management participation in the risk management certification program. This certification serves as an important basis for addressing the ever-evolving risk challenges in banking sector. As the manifestation of the commitment to adaptive risk management, the Bank also periodically holds advanced training for certified management. The details of certifications held by the management in 2025 were as follows:

Level	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Pejabat Eksekutif Executive Officers	Lain-Lain Others	Total
IV	-	-	1	263	**264**
V	-	-	25	97	**122**
VI	-	-	6	3	**9**
VII	3	5	6	-	**14**
Total	**3**	**5**	**38**	**363**	**409**



Pengungkapan Eksposur Risiko
Disclosure of Risk Exposure

Sebagai bagian dari komitmen terhadap prinsip transparansi dan tata kelola yang baik, Bank Victoria menyampaikan informasi mengenai profil risiko yang dihadapi dalam menjalankan aktivitas usaha. Pengungkapan ini mencakup berbagai kategori risiko utama yang dapat memengaruhi kinerja operasional. Melalui pelaporan yang terbuka, Bank bertujuan membangun pemahaman yang kuat di kalangan pemangku kepentingan serta mendukung upaya mitigasi risiko secara proaktif demi menjaga keberlangsungan dan ketahanan usaha.

As part of the commitment to the principles of transparency and good governance, Bank Victoria discloses information on risk profile encountered in conducting its business activities. This disclosure covers various key risk categories that can impact operational performance. Through transparent reporting, the Bank aims to build a strong understanding among stakeholders and support proactive risk mitigation measures to maintain business continuity and resilience.

Risiko Kredit

Risiko kredit merupakan risiko kegagalan pihak lain dalam memenuhi kewajiban kepada Bank, termasuk risiko kredit akibat kegagalan debitur, risiko konsentrasi kredit, *counterparty credit risk, settlement risk,* dan *country risk*.

Tujuan dari manajemen risiko kredit adalah untuk memastikan aktivitas penyediaan dana Bank tidak terekspos pada risiko kredit yang dapat menimbulkan kerugian pada Bank.

Pengungkapan Eksposur Manajemen Risiko Kredit

1. Risiko Kredit secara Umum (CRA)

a. Model Bisnis Tercermin dalam Komponen Profil Risiko Kredit Bank

Penerapan manajemen risiko Bank untuk risiko kredit secara prinsip mengacu pada peraturan regulator dan ketentuan yang berlaku serta *market practices* yang disesuaikan dengan tujuan, kebijakan, ukuran, dan kompleksitas bisnis Bank untuk mencapai pertumbuhan bisnis yang sehat dan berkelanjutan serta menjaga agar dapat menghasilkan *return* yang optimal sesuai dengan *risk appetite* dan *risk tolerance* yang telah ditetapkan.

Dalam menjalankan strategi Bank sejalan dengan visi dan misi sebagai acuan dalam mengambil keputusan serta menjalankan kegiatan operasional Bank, strategi manajemen risiko kredit yang dilakukan oleh Bank untuk menjaga risiko kredit, di antaranya sebagai berikut:

1) Bank menjaga tingkat risiko kredit dengan mitigasi yang memadai untuk mencapai tujuan strategis.
2) Pertumbuhan/peningkatan portofolio kredit dengan memperhatikan kecukupan modal dalam kondisi normal dan skenario *stress*.

Credit Risk

Credit risk is the risk of failure of other parties in fulfilling obligations to the Bank, including credit risk due to debtor failure, credit concentration risk, counterparty credit risk, settlement risk, and country risk.

The credit risk management is aimed to ensure that the Bank's fund provision activities are not exposed to credit risk which could cause losses to the Bank.

Disclosure of Credit Risk Management Exposure

1. General Credit Risk (CRA)

a. Business Model is Reflected in the Bank's Credit Risk Profile Component

The Bank's risk management implementation for credit risk in principle refers to the applicable regulatory regulations and provisions, as well as market practices adapted to the objectives, policies, size, and complexity of the Bank's business, in order to achieve healthy and sustainable business growth and ensure that it can produce optimal returns in accordance with the established risk appetite and risk tolerance.

In carrying out the Bank's strategy in line with vision and mission as a reference in making decisions and carrying out the Bank's operational activities, the credit risk management strategy carried out by the Bank to maintain credit risk, includes the following:

1) The Bank maintains credit risk levels with adequate mitigation to achieve strategic objectives.
2) Growth/increase in credit portfolio with due observance of the capital adequacy in normal conditions and stress scenarios.

Strategi manajemen risiko disusun untuk memastikan bahwa eksposur risiko dikelola secara terkendali sesuai dengan kebijakan kredit, prosedur internal, peraturan dan perundang-undangan, serta ketentuan lain yang berlaku.

b. Kebijakan Manajemen Risiko untuk Risiko Kredit dan Limit Risiko Kredit
Kebijakan manajemen risiko untuk risiko kredit merupakan arahan tertulis dalam menerapkan manajemen risiko untuk risiko kredit dengan memperhatikan karakteristik dan kompleksitas kegiatan usaha, tingkat risiko yang akan diambil dan toleransi risiko, profil risiko serta peraturan yang ditetapkan otoritas dan/atau praktik perbankan yang sehat, seperti di antaranya pengendalian risiko konsentrasi kredit dan/atau dengan melakukan diversifikasi portofolio kredit dan penyebaran risiko yang timbul dari berbagai sektor industri atau sektor ekonomi. Terkait hal ini, Bank di antaranya melakukan:
1) Penetapan limit berdasarkan sektor ekonomi atas analisa makro ekonomi dan karakteristik Bank.
2) Analisa risiko konsentrasi kredit dilakukan sesuai portofolio yang dikelola Bank dengan mempertimbangkan berbagai dampak perubahan dari indikator ekonomi yang dapat memengaruhi pemberian kredit pada sektor ekonomi tertentu.
3) Analisa pergerakan kualitas kredit, seperti *non-performing loan*.

Penetapan limit dilakukan secara komprehensif atas seluruh aspek yang terkait dengan risiko, yang mencakup limit per aktivitas bisnis Bank. Limit digunakan sebagai ambang batas untuk menentukan tingkat intensitas mitigasi risiko yang akan dilaksanakan manajemen.

c. Struktur Organisasi Manajemen Risiko Kredit
Penerapan manajemen risiko kredit di Bank Victoria dilakukan melalui desain struktur organisasi yang menggambarkan keterlibatan seluruh pihak yang terkait manajemen risiko kredit sebagai berikut:

1) Dewan Komisaris berperan dalam menyetujui rencana kredit tahunan Bank dan mengawasi pelaksanaannya, menyetujui kebijakan perkreditan Bank, meminta penjelasan dan tanggung jawab kepada Direksi jika dalam pelaksanaan pemberian kredit terdapat penyimpangan dari kebijakan yang telah ditetapkan.

Risk management strategy is prepared to ensure that risk exposure is managed in a controlled manner in accordance with credit policies, internal procedures, rules and regulations, and other applicable provisions.

b. Risk Management Policy for Credit Risk and Credit Risk Limit
Risk management policy for credit risk is written direction in implementing risk management for credit risk by considering business activities' characteristics and complexity, level of risk to be taken and risk tolerance, risk profile and regulations set by authorities and/or sound banking practices, as in including controlling credit concentration risk and/or by diversifying credit portfolio and spreading risks arising from various industrial sectors or economic sector. Regarding this matter, the Bank conducts:

1) Establishment of limit based on the economic sector of the macroeconomic analysis and the Bank's characteristics.
2) Credit concentration risk analysis is conducted according to the portfolio managed by the Bank by considering various impacts of changes in economic indicators that can affect lending on certain economic sector.
3) Analysis of credit quality movements, such as non-performing loans.

Limit is established comprehensively for all aspects related to risk, which includes limits per Bank business activity. Limits are used as thresholds to determine the level of risk mitigation intensity to be implemented by the management.

c. Organizational Structure of Credit Risk Management
The implementation of credit risk management at Bank Victoria is carried out through the design of an organizational structure that describes the involvement of all parties related to credit risk management as follows:
1) The Board of Commissioners plays a role in approving the Bank's annual credit plan and supervising its implementation, approving the Bank's credit policy, asking for explanation and accountability from the Board of Directors if there is a deviation from the stipulated policy in the provision of credit.

2) Direksi berperan dalam menyusun rencana dan kebijakan perkreditan, memastikan kepatuhan Bank terhadap ketentuan perundang-undangan dan peraturan yang berlaku di bidang perkreditan dan kebijakan perkreditan, serta melaporkan kepada Dewan Komisaris mengenai pelaksanaan rencana perkreditan, penyimpangan dalam pelaksanaan pemberian kredit, perkembangan kualitas portofolio kredit dan kredit dalam pengawasan khusus atau bermasalah.
3) Lini Pertahanan Pertama, terdiri dari Divisi Bisnis, Divisi *Credit Risk Review,* Divisi *Loan & Trade Operations,* dan Divisi *Special Asset Management*. Lini Pertahanan Kedua terdiri dari *Credit Monitoring* dan *Collection* dan Divisi *Corporate Legal.*
4) Lini Pertahanan Kedua, terdiri dari *Credit Legal Unit;* Divisi *Compliance, System Procedure & Coordinator Customer Protection;* dan Divisi Satuan Kerja Manajemen Risiko.
5) Lini Pertahanan Ketiga adalah Divisi SKAI.

Selain itu, Bank juga dibantu oleh komite-komite eksekutif, seperti:
1) Komite Kredit.
2) Komite Kebijakan Perkreditan.
3) Komite Manajemen Risiko.

d. Hubungan antara Fungsi Manajemen Risiko untuk Risiko Kredit, Pengendalian Risiko, Kepatuhan, dan Audit Internal
Penerapan manajemen risiko bermanfaat untuk melakukan analisis kemungkinan adanya risiko yang akan dihadapi saat ini maupun yang akan datang dengan tujuan agar Bank mampu mengidentifikasi setiap risiko yang berpotensi muncul dan berdampak signifikan.

Secara internal, efektivitas penerapan manajemen risiko kredit juga didukung oleh unit independen lainnya, seperti *Compliance* dan SKAI. Dalam hal ini, *Compliance* melakukan fungsinya untuk memastikan kebijakan dan penerapan manajemen risiko telah sesuai ketentuan yang berlaku. Sementara itu, SKAI secara rutin melakukan peninjauan ulang dan audit terhadap penerapan manajemen risiko Bank berdasarkan *risk-based audit* dengan tujuan sebagai pengendalian internal serta perbaikan penerapan manajemen risiko secara terus menerus. Adapun evaluasi efektivitas sistem manajemen risiko secara eksternal dilakukan oleh auditor eksternal maupun regulator. Evaluasi penerapan manajemen risiko ditinjau dan dikomunikasikan melalui rapat-rapat secara berkala, seperti melalui rapat Komite Manajemen Risiko.

2) The Board of Directors plays a role in preparing credit plans and policies, ensuring the Bank's compliance with the laws and regulations applicable in credit sector and credit policies, and reporting to the Board of Commissioners on credit plan implementation, irregularities in the implementation of credit extension, development of credit and credit portfolio quality under special mention or non-performing.
3) The First Line of Defense, consists of the Business Division, Credit Risk Review Division, Loan & Trade Operations Division, and Special Asset Management Division. The Second Line of Defense consists of the Credit Monitoring and Collection and Corporate Legal Division.
4) The Second Line of Defense, consisting of Credit Legal Unit; Compliance, System Procedure & Coordinator Customer Protection Division; and Risk Management Work Unit Division.
5) The Third Line of Defense is the SKAI Division.

Furthermore, the Bank is also assisted by executive committees, such as:
1) Credit Committee.
2) Credit Policy Committee.
3) Risk Management Committee.

d. Relationship between Risk Management Function for Credit Risk, Risk Control, Compliance, and Internal Audit
Risk management is useful to analyze the possible risks that may be faced in the present or future, with the aim of enabling the Bank to identify any potential risks that may arise and have a significant impact.

Internally, the effectiveness of credit risk management implementation is also supported by other independent units, such as the Compliance and SKAI. In this matter, the Compliance performs its function to ensure that risk management policies and implementation are in accordance with the applicable regulations. Whereas, the SKAI regularly reviews and audits the Bank's risk management implementation on a risk-based audit principle with the objective as internal control and continuous improvement of risk management implementation. The risk management system effectiveness is externally evaluated by external auditors and regulators. Evaluation of risk management implementation is reviewed and communicated through regular meetings, such as through the Risk Management Committee's meetings.

e. Cakupan dan Informasi Utama dari Pelaporan Eksposur

Risiko Kredit dan Fungsi Manajemen Risiko untuk Risiko Kredit kepada Direksi dan Dewan Komisaris Pengungkapan eksposur risiko kredit dengan pendekatan standar risiko kredit berpedoman pada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 48/SEOJK.03/2017 tentang Pedoman Perhitungan Tagihan Bersih Transaksi Derivatif dalam Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar, dan Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2021 Pedoman Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Kredit dengan Menggunakan Pendekatan Standar bagi Bank Umum.

Terkait pengungkapan, Bank senantiasa menerapkan kebijakan dan mengedepankan prinsip kehati-hatian dalam mitigasi risiko kredit. Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRA:

1) Tabel Pengungkapan Kualitas Kredit atas Aset (CR1).
2) Tabel Pengungkapan Mutasi Kredit dan Surat Berharga yang telah Jatuh Tempo (CR2).
3) Tabel Pengungkapan Kuantitatif terkait Teknik MRK (CR3).
4) Tabel Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4).
5) Tabel Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5).

2. Pengungkapan Tambahan terkait Kualitas Kredit atas Aset (CRB)

a. Tagihan yang Jatuh Tempo dan Tagihan yang Mengalami Penurunan Nilai/*Impairment*

Bank menerapkan kebijakan tentang tagihan yang jatuh tempo dan tagihan yang mengalami penurunan nilai atau *impairment*, yang meliputi:

1) Tagihan yang telah jatuh tempo, merupakan tagihan yang telah jatuh tempo lebih dari 90 hari, baik atas pembayaran pokok dan/atau pembayaran bunga.
2) Tagihan yang mengalami penurunan nilai, yaitu suatu kondisi, di mana terdapat bukti objektif terjadinya peristiwa yang merugikan sebagai akibat dari satu atau lebih peristiwa yang terjadi setelah pengakuan awal kredit tersebut, dan

e. Scope and Key Information from the Reporting of Credit

Risk Exposure and Risk Management Function for Credit Risk to the Board of Directors and Board of Commissioners Disclosure of credit risk exposure with a standardized approach of credit risk refers to the Financial Services Authority Regulation No. 27 of 2022 on Second Amendment to Financial Services Authority Regulation No. 11/POJK.03/2016 on Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 48/SEOJK.03/2017 on Guidelines for Calculating Net Receivables for Derivative Transactions in Calculating Risk-Weighted Assets for Credit Risk by Using a Standardized Approach, and Financial Services Authority Circular No. 24/SEOJK.03/2021 on Guidelines for Calculating Risk-Weighted Assets for Credit Risk by Using Standardized Approach for Commercial Banks.

Regarding disclosure, the Bank always implements policies and prioritizes the prudential principles in mitigating credit risk. Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRA:

1) Table of Disclosure of Credit Quality over Asset (CR1).
2) Table of Disclosure of Changes in Matured Loans and Securities (CR2).
3) Table of Disclosure of Quantitative related to MRK Techniques (CR3).
4) Table of Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4).
5) Table of Disclosure of Exposure by Asset Class and Risk Weight (CR5).

2. Additional Disclosures regarding Credit Quality over Asset (CRB)

a. Matured Receivables and Impaired Receivables

The Bank implements policies regarding due receivables and impaired receivables, which include:

1) Matured receivable is a bill that has been overdue more than 90 days, either on the payments of principal and/or interest.

2) Impaired receivable is a condition in which there is objective evidence of an adverse event occurring as a result of one or more events occurring after the initial recognition of such credit, and such adverse event has an impact

peristiwa yang merugikan tersebut berdampak pada estimasi arus kas masa datang atas aset keuangan atau kelompok aset keuangan yang dapat diestimasi secara andal.

b. Pendekatan yang Digunakan dalam Pembentukan Cadangan Kerugian Penurunan Nilai
Dalam mengestimasi CKPN atas aset keuangan, Bank telah menerapkan Pernyataan Standar Akuntansi Keuangan (PSAK) 71 tentang "Instrumen Keuangan" sejak tanggal 1 Januari 2020. Dalam PSAK 71 ini memperkenalkan metode kerugian kredit ekspektasian dalam mengukur kerugian instrument keuangan akibat penurunan nilai instrumen keuangan yang merupakan konvergensi *International Financial Accounting Standard* 9 - *Financial Instrument* di Indonesia, di mana dalam PSAK 71 menggunakan prinsip *Forward-Looking Expected Credit Loss* (ECL).

Permodelan parameter yang digunakan Bank, seperti *probability of default, loss given default*, dan *exposure at default* komponen perhitungan kerugian kredit ekspektasian.

Dalam menghitung kerugian kredit ekspektasian, Bank memperhitungkan pengaruh dari beberapa *macroeconomic forecast* dalam permodelan *impairment* di PSAK 71.

CKPN dalam PSAK 71 memiliki 3 (tiga) *stages* berdasarkan tingkat risiko dari rendah hingga tinggi yang diklasifikasi sebagai berikut:
1) *Stage 1* (*Performing*)
Tidak ada peningkatan risiko kredit dan aset keuangan. Contohnya, pinjaman yang tidak pernah terlambat dalam pembayaran. ECL diperkirakan dalam waktu 12 (dua belas) bulan.
2) *Stage* 2 (*Under-Performing*)
Risiko kredit dan aset keuangan meningkat signifikan. Contohnya, pinjaman yang telah terlambat dalam pembayaran lebih dari 30 (tiga puluh) hari, tapi belum masuk dalam kriteria *Stage* 3. ECL diperkirakan hingga waktu jatuh tempo akhir (*lifetime*).
3) *Stage* 3 (*Non-Performing*)
Kredit dan aset keuangan yang mengalami penurunan nilai dengan tajam disertai riwayat keterlambatan pembayaran. ECL diakui hingga waktu jatuh tempo akhir (*lifetime).*

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRB:
1) Tabel Pengungkapan Tagihan Bersih berdasarkan Wilayah Bank secara Individual.

on the estimated future cash flow of a financial asset or group of financial assets that can be estimated reliably.

b. Approach Used in the Formation of Allowance for Impairment Losses
In estimating CKPN on financial assets, the Bank has implemented Statement of Financial Accounting Standard (PSAK) 71 on "Financial Instrument" since 1 January 2020. PSAK 71 introduces a method for the expected credit losses in measuring financial instrument losses due to impairment of financial instruments, which is the convergence of International Financial Accounting Standard 9 - Financial Instruments in Indonesia, and in PSAK 71, the principle of Forward-Looking Expected Credit Loss (ECL) is used.

The modeling parameters used by the Bank, such as probability of default, loss given default, and exposure at default, are components for calculating expected credit losses.

In calculating the expected credit losses, the Bank calculates the effects of several macroeconomic forecasts in the impairment modeling in PSAK 71.

CKPN in PSAK 71 has 3 (three) stages based on level of risk from low to high which are classified as follows:
1) Stage 1 (Performing)
There is no increase in credit risk and financial assets. For example, a loan that is never late in payment. ECL is estimated within 12 (twelve) months.

2) Stage 2 (Under-Performing)
Credit risk and financial assets have increased significantly. For example, a loan that is overdue by more than 30 (thirty) days, but has not met the Stage 3 criteria. ECL is estimated up to the final maturity time (lifetime).
3) Stage 3 (Non-Performing)
Loans and financial assets that have experienced a sharp impairment accompanied by a history of late payments. ECL is recognized up to the final maturity time (lifetime).

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRB:
1) Table of Disclosure of Net Receivables by Area of the Bank, Individually.

2) Tabel Pengungkapan Tagihan Bersih berdasarkan Sektor Ekonomi Bank secara Individual.
3) Tabel Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak secara Individual.
4) Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Wilayah Bank secara Individual.
5) Tabel Pengungkapan Tagihan dan Pencadangan berdasarkan Sektor Ekonomi Bank secara Individual.
6) Tabel Pengungkapan Tagihan berdasarkan Hari Tunggakan.

3. Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A)

a. Aset *Non-Performing*

Aset *non-performing* merupakan aset dengan kualitas kurang lancar, diragukan, dan macet yang umumnya terjadi pada kegiatan perkreditan. Penyelesaian aset bermasalah bagi debitur dilakukan sesuai dengan pola pengelolaan dan penyelesaian sesuai ketentuan yang berlaku. Aset yang telah dikategorikan bermasalah ditangani melalui pembinaan, penyelamatan, serta penyelesaian secara sukarela. Pelaporan aset bermasalah dilakukan oleh Divisi *Special Asset Management*.

Dalam usahanya, Bank melakukan penanganan aset bermasalah secara persuasif serta menghindari risiko reputasi Bank, maka sebelum melakukan tindakan-tindakan lebih lanjut dilakukan pemanggilan atas debitur terlebih dahulu dengan menggunakan surat peringatan maksimal 3 (tiga) kali.

Kategori kredit korporasi pada Bank terbagi atas beberapa segmen, di antaranya sebagai berikut:
1) *Large commercial*, kredit dengan tujuan usaha (produktif) dengan total plafon di atas Rp150.000 juta.
2) *Commercial,* kredit dengan tujuan usaha (produktif) dengan total plafon di atas Rp50.000 juta-Rp150.000 juta.
3) *Small, Medium, Enterprise* (SME), kredit dengan tujuan usaha (produktif) dengan total plafon sampai dengan Rp50.000 juta.
4) *Business Linkage*, kredit yang ditujukan pada perusahaan *multifinance* otomotif, baik *executing, channeling*, dan *joint financing,* serta perusahaan *multifinance* non-otomotif, seperti BPR dan koperasi.

Kategori kredit ritel pada Bank, di antaranya adalah segmen *consumer* yang diberikan kepada perorangan dan diajukan secara kelompok.

2) Table of Disclosure of Net Receivables by Economic Sector of the Bank, Individually.
3) Table of Disclosure of Net Receivables by Remaining Contract Period of the Bank, Individually.
4) Table of Disclosure of Receivables and Allowances by Area of the Bank, Individually.
5) Table of Disclosure of Receivables and Allowances by Economic Sector of the Bank, Individually.
6) Table of Disclosure of Receivables by Days Past Due.

3. Additional Disclosures regarding Treatment of Non-Performing Assets (CRB-A)

a. Non-Performing Assets

Non-performing assets are assets of substandard, doubtful, and loss, which generally occur in credit activities. Settlement of non-performing assets for debtors is carried out in accordance with management and settlement patterns with due observance of the applicable regulations. Assets categorized as non-performing are handled through couching, rescue, and voluntary settlement. Reporting of non-performing assets is carried out by the Special Asset Management Division.

In its business, the Bank handles non-performing assets persuasively and avoids risks to the Bank's reputation, thus, the debtor is first summoned by using a maximum of 3 (three) warning letters prior to taking further actions.

The corporate credit category at the Bank is divided into several segments, including the following:
1) Large commercial, credit for business (productive) purposes with a total credit above Rp150,000 million.
2) Commercial, credit for business (productive) purposes with a total credit above Rp50,000-Rp150,000 million.
3) Small, Medium, Enterprise (SME), credit for business purposes (productive) with a total credit of up to Rp50,000 million.
4) Business Linkage, credit aimed at automotive multifinance companies, including executing, channeling, and joint financing, as well as non-automotive multifinance companies, such as BPRs and cooperatives.

Retail credit categories at the Bank include consumer segment given to individuals and submitted as a group.

b. Aset yang Direstrukturisasi
Aset yang direstrukturisasi umumnya dilakukan pada kegiatan perkreditan merupakan upaya yang dilakukan Bank dalam kegiatan perkreditan terhadap debitur yang mengalami kesulitan untuk memenuhi kewajibannya. Restrukturisasi kredit dapat dilakukan Bank terhadap debitur yang masih mempunyai prospek usaha yang baik tetapi mengalami kesulitan pembayaran pokok dan/atau bunga. Kegiatan restrukturisasi dapat berupa:
1) Penjadwalan kembali (*rescheduling*), terkait perubahan jadwal pembayaran dan/atau jangka waktu.
2) Persyaratan kembali (*reconditioning*), terkait perubahan sebagian atau seluruh syarat kredit yang tidak terbatas pada jadwal pembayaran, jangka waktu, dan/atau persyaratan lainnya sepanjang tidak menyangkut perubahan maksimum saldo kredit.
3) Penataan kembali (*restructuring*), terkait perubahan syarat kredit yang menyangkut penambahan dana, konversi tunggak bunga menjadi pokok kredit baru, dan konversi kredit menjadi penyertaan dalam perusahaan dengan bentuk reorganisasi, *venture capital, management participation,* dan *management consultation.*

Dalam hal ini, Bank telah memuat informasi berikut dalam Lampiran Pengungkapan Kuantitatif Eksposur Risiko untuk CRB-A:

Tabel Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A).

4. Pengungkapan terkait Teknik MRK (CRC)

a. Kebijakan dan Proses terkait Evaluasi dan Manajemen Agunan
Bank didukung oleh analisa kelayakan debitur dalam pemberian fasilitas kredit. Hal tersebut bertujuan untuk menilai kemampuan debitur dalam mengembalikan seluruh kewajibannya. Sebagai jaminan kredit, Bank menerima agunan yang memenuhi kriteria, seperti mempunyai nilai ekonomis, *marketable*, *transferable*, serta mempunyai nilai yuridis. Dalam praktiknya, diperlukan agunan sebagai *second way out*, dalam hal debitur tidak mampu mengembalikan kewajibannya.

Pengelolaan agunan merupakan perangkat pengendalian risiko yang diterapkan oleh Bank guna melakukan mitigasi risiko kredit untuk meminimalisir dampak dari risiko yang terjadi.

b. Restructured Assets
Restructuring assets are generally carried out in credit activities, which is the Bank's effort in credit activities for debtors with difficulty on fulfilling their obligations. The Bank can carry out credit restructuring for debtors with good business prospects but are experiencing difficulties in paying principal and/or interest. Restructuring activities can be in the form of:

1) Rescheduling, related to changes in payment schedule and/or time period.

2) Reconditioning, related to changes in part or all of the credit terms not limited to payment schedules, time periods, and/or other terms as long as they do not involve changes to the maximum credit balance.

3) Restructuring, related to changes in credit terms involving additional funds, conversion of interest arrears into new credit principal, and conversion of credit into investment in the Company in form of reorganization, venture capital, management participation, and management consultation.

Regarding this matter, the Bank has included the following information in the Appendix on Quantitative Disclosure of Risk Exposure for CRB-A:

Table of Additional Disclosures regarding Treatment of Non-Performing Assets (CRB-A).

4. Disclosures related to MRK Techniques (CRC)

a. Policies and Processes related to Collateral Evaluation and Management
The Bank is supported by debtor feasibility analysis in granting credit facilities. This matter is aimed at assessing the debtor's ability in returning all of its obligations. As credit collateral, the Bank accepts collateral that meets the criteria, such as having economic value, marketable, transferable, and having juridical value. In practice, collateral is needed as a second way out, in the event that the debtor is unable to repay his obligations.

Collateral management is a risk control tool implemented by the Bank to mitigate credit risk in order to minimize the impact of the arising risks.

b. Konsentrasi Risiko Kredit atas Instrumen yang Digunakan sebagai Teknik MRK
Pihak-pihak utama pemberi jaminan/garansi dan kelayakan kredit (*credit worthiness*) merupakan kemampuan perusahaan untuk memenuhi kewajibannya terhadap Bank. Fokus utamanya terletak pada risiko, meliputi analisis likuiditas maupun solvabilitas. Alat analisis kredit dan kriterianya untuk penilaian seperti di antaranya jenis kredit dan tujuan kontrak utangnya.

Tingkat konsentrasi yang ditimbulkan dari penggunaan teknik mitigasi risiko kredit konsentrasi pada sektor atau portofolio kredit Bank dilakukan dengan pengelolaan risiko konsentrasi kredit melalui penentuan limit untuk sektor industri atau portofolio kredit pada suatu tingkat risiko/*risk appetite* dan *risk tolerance* yang dapat diterima. Hal tersebut bertujuan untuk mendukung pertumbuhan kredit yang sehat dengan mengedepankan pada prinsip-prinsip kehati-hatian.

5. Pengungkapan Penggunaan Peringkat Kredit Eksternal (CRD)

a. Lembaga Pemeringkat yang Digunakan Bank
Bank menggunakan peringkat yang diterbitkan oleh lembaga pemeringkat yang diakui sesuai dengan Peraturan Otoritas Jasa Keuangan seperti diatur dalam Surat Edaran Otoritas Jasa Keuangan No. 37/SEOJK.03/2016 tentang Lembaga Pemeringkat dan Peringkat yang diakui Otoritas Jasa Keuangan, antara lain Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, dan Fitch Indonesia.

b. Kategori Portofolio yang Menggunakan Peringkat
Bank mengklasifikasikan tagihan berdasarkan kategori portofolio, seperti tagihan kepada entitas sektor publik, tagihan kepada Bank, tagihan pada perusahaan efek dan lembaga jasa keuangan lainnya, serta tagihan kepada korporasi. Tagihan pada masing-masing portofolio dikelompokkan berdasarkan peringkat dari lembaga pemeringkat yang diakui regulator. Kelompok peringkat memiliki tingkat risiko yang berbeda.

Pengungkapan *Counterparty Credit Risk*

Bank menerapkan risiko kredit pihak lawan (*Counterparty Credit Risk*). *Counterparty Credit Risk* dapat ditimbulkan dari jenis transaksi derivatif *over the counter* (OTC) dan *repo/reverse repo*, baik pada posisi *banking book* maupun *trading book*. Dalam hal memitigasi *repo/reverse repo* dilakukan dengan penetapan limit *counterparty*, apabila terdapat pelampauan limit, maka perlu mendapatkan persetujuan Direksi melalui Divisi *International Banking*.

b. Concentration of Credit Risk on Instruments Used as MRK Techniques
The main parties are the provider of collateral/guarantee and credit worthiness, which is the ability of the Company to fulfill its credit obligations to the Bank. The main focus lies in risk, including liquidity and solvency analysis. The credit analysis tool and its criteria for assessment of among others type and purpose of the debt contract.

The concentration level arising from the use of credit risk mitigation techniques concentration on sector or loan portfolio of the Bank is carried out by managing credit concentration risk through setting limit for industrial sector or loan portfolio of an acceptable level of risk/risk appetite and risk tolerance. This matter aims to support sound credit growth by prioritizing prudential principles.

5. Disclosure of Use of External Credit Ratings (CRD)

a. Rating Agency Used by the Bank
The Bank uses ratings issued by rating agencies that are recognized in accordance with Financial Services Authority Regulations as stipulated in the Financial Services Authority Circular No. 37/SEOJK.03/2016 on Rating Agencies and Ratings recognized by the Financial Services Authority, including Moody's, Standard & Poor's, Fitch, Pefindo, Moody's Indonesia, and Fitch Indonesia.

b. Portfolio Categories by Using Ratings
The Bank classifies receivables by portfolio categories, such as receivables from public sector entities, receivables from Banks, receivables from securities companies and other financial services institutions, as well as receivables from corporations. Receivables in each portfolio are grouped by ratings from rating agencies recognized by the regulator. Rating groups have different levels of risk.

Disclosure of Counterparty Credit Risk

The Bank implements Counterparty Credit Risk. Counterparty Credit Risk is a risk arising from over the counter (OTC) derivative transaction and repo/reverse repo transactions, both in the banking book and trading book positions. In terms of repo/reverse repo mitigation with limit establishment for counterparty, approval from the Board of Directors through International Banking Division is required in the event that there is limit exceedance.

Pada posisi 31 Desember 2025, Bank tidak memiliki eksposur transaksi derivatif *Counterparty Credit Risk* (CCR1) dan tagihan bersih derivatif kredit (CCR6). Namun terkait pengungkapan, Bank Victoria memiliki eksposur risiko transaksi *reverse repo* yang diungkapkan pada tabel pengungkapan eksposur CCR berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3).

Pengungkapan Eksposur Sekuritisasi (SECA)

Sebagai upaya diversifikasi risiko dan memaksimalkan hasil, Bank Victoria menempatkan sejumlah portofolio dalam bentuk sekuritisasi atau Kontrak Investasi Kolektif Efek Beragun Aset (KIK EBA). Bank Victoria bertindak sebagai investor dan melakukan investasi pada EBA karena sekuritisasi ini mempunyai likuiditas baik.

Terkait pengungkapan, Bank Victoria memuat informasi Eksposur Sekuritisasi (SECA) pada *Banking Book* (SEC1) dan terkait Persyaratan Modalnya - Bank yang Bertindak sebagai Investor (SEC4), dan tidak memiliki eksposur pada *Trading Book* (SEC2), dan terkait Persyaratan Modalnya - Bank yang Bertindak sebagai Originator atau Sponsor (SEC3).

Risiko Pasar

Kebijakan Manajemen Risiko untuk Risiko Pasar

1. **Strategi dan Proses Manajemen Risiko Pasar**
   Risiko pasar adalah risiko pada posisi neraca dan rekening administratif, termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga *option*.

   Proses manajemen risiko pasar mencakup semua risiko yang dihadapi Bank akibat pergerakan faktor pasar, seperti suku bunga dan nilai tukar, baik dari *banking book* maupun *trading book*. Tujuan utama dari penerapan manajemen risiko pasar adalah meminimalkan dampak negatif akibat perubahan kondisi pasar terhadap aset dan permodalan Bank. Bank menjaga eksposur risiko pasar dalam batas limit internal dan regulasi, dengan tetap memperhatikan kecukupan modal dan pendapatan.

   Penerapan manajemen risiko pasar bertujuan untuk meminimalkan dampak negatif dari perubahan kondisi pasar terhadap aset dan permodalan. Ruang lingkup penerapan ini meliputi:
   a. Pengawasan aktif oleh Dewan Komisaris dan Direksi.

   b. Kecukupan kebijakan, prosedur, dan penetapan limit risiko pasar.

At 31 December 2025 position, the Bank has no exposure to Counterparty Credit Risk (CCR1) and net receivables of credit derivative (CCR6). However, regarding disclosure, Bank Victoria has a reverse repo transaction risk exposure which is disclosed in the CCR exposure disclosure table based on Portfolio Category and Risk Weight (CCR3).

Disclosure of Securitization Exposure (SECA)

In an effort to diversify risks and maximize returns, Bank Victoria places a number of portfolios in the form of securitization or Collective Investment Contract of Asset-Backed Securities (KIK EBA). Bank Victoria acts as an investor and invests in EBA due its good liquidity.

Regarding disclosure, Bank Victoria contains information on Securitization Exposure (SECA) in the Banking Book (SEC1) and related to its Capital Requirements - Bank Acting as Investor (SEC4), and has no exposure in the Trading Book (SEC2), and related to its Capital Requirements - Bank Acting as Originator or Sponsor (SEC3).

Market Risk

Risk Management Policy for Market Risk

1. **Market Risk Management Strategy and Process**
   Market risk is a risk in balance sheet and administrative account positions including derivative transactions, due to overall changes in market conditions, including the risk of changes in option prices.

   The management process of market risk covers all risks faced by the Bank as a result of movements in market factors, such as interest rates and exchange rates, both from the banking book and trading book. The main objective of implementing market risk management is to minimize the negative impacts due to changes in market conditions on the Bank's assets and capital. The Bank maintains market risk exposure within internal and regulatory limits, with due observance of capital adequacy and income.

   The implementation of market risk management aims to minimize the negative impact of changes in market conditions on assets and capital. The scope of this application includes:
   a. Active supervision by the Board of Commissioners and Board of Directors.
   b. Adequacy of policies, procedures, and determination of market risk limits.

c. Proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko, serta penerapan sistem informasi manajemen risiko pasar.
d. Sistem pengendalian internal yang memadai untuk mengelola risiko pasar secara efektif.

Adapun proses manajemen risiko untuk risiko pasar, sebagai berikut:
a. Identifikasi
   Bank melakukan identifikasi risiko pasar secara berkala, termasuk risiko suku bunga dan nilai tukar.
b. Pengukuran
   Bank menggunakan sistem atau model pengukuran risiko pasar untuk mengukur posisi dan sensitivitas risiko pasar, baik dalam kondisi normal maupun *stress testing*.
c. Pemantauan
   Bank melakukan pemantauan kepatuhan limit risiko secara harian dan mengambil tindak lanjut jika terjadi pelampauan limit. Untuk pemantauan risiko suku bunga pada *banking book*, laporan yang digunakan mencakup perilaku *non-maturity deposit*, informasi *prepayment* serta data ekonomi terkini.
d. Pengendalian
   Manajemen mengambil langkah-langkah pengendalian risiko, termasuk tindakan pencegahan terhadap potensi kerugian yang lebih besar.

Dalam manajemen risiko pasar, Bank mempertimbangkan strategi *trading* Bank, posisi pasar, komposisi instrumen/produk, dan kategori nasabah Bank. *Trading book* mencakup seluruh posisi instrumen keuangan dalam neraca dan rekening administratif, termasuk transaksi derivatif yang dimiliki Bank dengan tujuan untuk diperdagangkan dan dilindungi nilai secara keseluruhan dan untuk transaksi kepentingan sendiri (*proprietary positions*), atas permintaan nasabah, atau untuk kepentingan perantaraan (*brokering*) dan pembentukan pasar (*market making*) dan lindung nilai (*hedging*) atas posisi lainnya dalam *trading book*.

a. Pengelolaan Risiko *Trading Book*
   1) Pemisahan *trading book* dan *banking book*, setiap transaksi harus diakui secara jelas sebagai bagian dari *trading book* atau *banking book* sejak transaksi tersebut dibukukan.
   2) Kontrol risiko, semua produk baru dan variasi produk yang telah disetujui harus dikaji dan disetujui sesuai dengan kebijakan dan prosedur peluncuran produk baru.
   3) Tata kelola surat berharga, di mana transaksi surat berharga harus sesuai dengan limit *trading book* terkini, serta memperhatikan kontrol risiko kredit terkait kepemilikan surat berharga.

c. The process of risk identification, measurement, monitoring, and control, as well as implementation of market risk management information system.
d. Adequate internal control system to manage market risk effectively.

The risk management process for market risk is as follows:
a. Identification
   The Bank periodically identifies market risks, including interest rate and exchange rate risks.
b. Measurement
   The Bank uses market risk measurement system or model to measure the position and sensitivity of market risk, both under normal conditions and stress testing.
c. Monitoring
   The Bank monitors risk limit compliance on a daily basis and takes follow-up action if the limit is exceeded. To monitor interest rate risk in the banking book, the reports used include non-maturity deposit behavior, prepayment information, and current economic data.
d. Control
   The Management takes risk control measures, including preventive measures against potential greater losses.

In market risk management, the Bank considers the Bank's trading strategy, market position, instrument/product composition, and customer categories. The trading book includes all positions of financial instruments in the balance sheet and administrative accounts, including derivative transactions owned by the Bank for the purpose of trade and hedged as a whole and for proprietary positions, at the request of customer, or for brokering activities, and to conduct market making and hedging of other positions in the trading book.

a. Trading Book Risk Management
   1) Separation of trading book and banking book, every transaction must be clearly recognized as part of trading book or banking book since the transaction was recorded.
   2) Risk control, all new products and variations of approved product must be reviewed and approved in accordance with policies and procedures of new product launch.
   3) Governance for securities, in which securities transaction must be in accordance with the current trading book limits, and pay attention to credit risk controls related to securities ownership.

4) Transaksi ke pasar (*market facing*) dan aktivitas internal suatu desk tertentu bertindak sebagai titik kontak dengan pasar keuangan eksternal, guna melakukan transaksi instrumen yang sama antara 2 (dua) buku untuk menghindari kerugian *bid offer spread* terhadap pihak eksternal.

b. Pengelolaan Risiko *Banking Book*

1) Klasifikasi *banking book,* yaitu semua posisi yang bukan untuk tujuan trading dikategorikan sebagai *banking book*.
2) Tata kelola *banking book,* yaitu ALCO, Komite Kredit, dan tim pengelolaan portofolio bertanggung jawab atas aktivitas *banking book*, termasuk pengelolaan surat berharga aset dan kewajiban lainnya di bawah *Treasury*.
3) Transfer atau pengklasifikasian ulang *banking book*, misalnya antara *Fair Value Through Other Comprehensive Income* (FVTOCI) dan *amortised cost*, yang harus mengikuti ketentuan yang berlaku.
4) Pengelolaan Risiko Suku Bunga dalam *Banking Book* (IRRBB) yaitu Bank melakukan pemantauan dan pengendalian risiko IRRBB guna mengelola dampak perubahan suku bunga terhadap profitabilitas dan permodalan.
5) Pengelolaan risiko nilai tukar (*foreign exchange risk*) dilakukan dengan meminimalkan eksposur *foreign exchange* diminimalkan, terutama dalam *banking book*, di mana ada posisi yang tidak dilindungi nilai ditransfer ke *trading book*.

Untuk transaksi yang dilakukan dalam rangka *hedging*, Bank perlu memastikan:

1) Pencatatan yang dilakukan sesuai standar akuntansi, tanpa menyebabkan penyimpangan dalam pengakuan pendapatan.
2) Transaksi sesuai dengan instruksi atau rekomendasi manajemen atau ALCO.
3) Memitigasi risiko pasar, dengan melakukan penilaian menilai berkala terhadap efektivitas lindung nilai, khususnya dalam perhitungan rasio *hedging*.
4) Pemantauan dan evaluasi rasio lindung nilai dari waktu ke waktu.
5) Penilaian kredibilitas pihak lawan transaksi dan pencegahan terhadap konsentrasi penempatan risiko.

2. Struktur Organisasi Manajemen Risiko Pasar

Struktur organisasi manajemen risiko pasar disesuaikan dengan karakteristik dan kompleksitas kegiatan usaha Bank. Adapun struktur organisasi manajemen risiko pasar diuraikan sebagai berikut:

4) Market facing transactions and internal activities of a particular desk act as a point of contact with external financial markets, in order to make transaction in the same instrument between 2 (two) books to avoid losses in bid offer spread to external parties.

b. Banking Book Risk Management

1) Banking book classification, namely all positions that are not for trading purposes are categorized as banking book.
2) Banking book governance, namely ALCO, Credit Committee, and portfolio management team are responsible for banking book activities, including the management of securities assets and other liabilities under Treasury.
3) Banking book transfer or reclassification, for example between Fair Value Through Other Comprehensive Income (FVTOCI) and amortised cost, which must comply with the applicable regulations.
4) Management of Interest Rate Risk in the Banking Book (IRRBB), in which the Bank monitors and controls IRRBB risk to manage the impact of changes in interest rates on profitability and capital.
5) Management of foreign exchange risk is carried out by minimizing foreign exchange exposure, particularly in the banking book, in which unhedged positions are transferred to the trading book.

For transactions carried out for hedging purposes, the Bank needs to ensure:

1) Recording is made in accordance with accounting standards, without causing irregularities in revenue recognition.
2) Transactions are in accordance with instructions or recommendations from the management or ALCO.
3) Mitigating market risk, by conducting periodic assessments of the effectiveness of hedging, particularly in calculating the hedging ratio.
4) Monitoring and evaluating the hedging ratio from time to time.
5) Assessing the credibility of counterparty and preventing concentration of risk placement.

2. Organizational Structure of Market Risk Management

The market risk management organizational structure is adapted to the characteristics and complexity of the Bank's business activities. The organizational structure of market risk management is described as follows:

a. Lini Pertahanan Pertama, merupakan unit bisnis khususnya Divisi *Treasury*.
b. Lini Pertahanan Kedua, unit yang bertanggung jawab adalah Divisi Satuan Kerja Manajemen Risiko.
c. Lini Pertahanan Ketiga, merupakan Divisi SKAI.

Dalam pengelolaan risiko pasar, Bank memiliki *Asset and Liabilities Committee* (ALCO) yang membahas hal-hal terkait pengelolaan risiko pasar yang dilakukan secara berkala termasuk pemantauan limit dan Komite Manajemen Risiko yang berfungsi untuk memantau tingkat risiko Bank.

3. Ruang Lingkup dan Sifat Pelaporan Risiko Pasar

Penerapan manajemen risiko pasar tidak hanya berfokus pada pengelolaan risiko, tetapi juga pada pemantauan risiko yang dihadapi Bank akibat pergerakan faktor pasar seperti suku bunga dan nilai tukar. Penerapan manajemen risiko pasar dilakukan melalui langkah-langkah berikut:

a. Pengelolaan risiko suku bunga dan nilai tukar terhadap instrumen keuangan dalam *trading book* dan *banking book*.
b. Menerapkan berbagai metode mitigasi, termasuk penetapan limit berdasarkan jenjang organisasi, kebijakan mengenai *limit for cut loss* untuk memantau risiko lebih efektif.
c. Menetapkan peringatan dini dengan mengukur sensitivitas pendapatan bunga bersih terhadap pergerakan suku bunga.
d. Melakukan *stress testing* guna menilai ketahanan Bank dalam menghadapi perubahan suku bunga dan harga pasar valuta asing dalam keadaan ekstrem.

Dalam pengukuran risiko pasar, Bank juga mempertimbangkan ATMR untuk risiko pasar dengan menggunakan pendekatan standar dalam perhitungan rasio KPMM, sesuai dengan Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar bagi Bank Umum.

Profil dan kinerja risiko pasar dievaluasi secara berkala dan dilaporkan kepada manajemen Bank, meliputi:

a. Pemantauan eksposur risiko pasar guna memastikan kepatuhan terhadap limit yang ditetapkan.
b. *Stress test* risiko pasar untuk mengukur ketahanan Bank dalam menghadapi skenario ekstrem.
c. Laporan Profil Risiko untuk Risiko Pasar sebagai bagian dari evaluasi dan mitigasi risiko.

a. The First Line of Defense, is a business unit, particularly the Treasury Division.
b. The Second Line of Defense is the Risk Management Work Unit Division.
c. Third Line of Defense, is the SKAI Division.

In managing market risk, the Bank has an Asset and Liabilities Committee (ALCO) that periodically discusses matters related to market risk management, including limit monitoring and Risk Management Committee that functions to monitor the Bank's risk level.

3. Scope and Nature of Market Risk Reporting

The implementation of market risk management does not only focus on risk management, but also on monitoring the risks faced by the Bank due to movements in market factors such as interest rates and exchange rates. The implementation of market risk management is done through the following steps:

a. Management of interest rate risk exchange rate on financial instruments in trading book and banking book.
b. Applying various mitigation methods, including setting limits based on organizational levels, policy on limit for cut loss to monitor risks more effectively.
c. Establishing early warnings by measuring the sensitivity of net interest income to interest rate movements.
d. Conducting stress testing to assess the Bank's resilience in facing changes in interest rates and foreign exchange market price in extreme conditions.

In measuring market risk, the Bank also considers RWA for market risk by using the standard approach in calculating the CAR, in accordance with the Financial Services Authority Circular No. 23/SEOJK.03/2022 on Calculation of Risk-Weighted Assets for Market Risk of Commercial Banks.

The market risk profile and performance are evaluated periodically and reported to the Bank's management, including:

a. Monitoring market risk exposure to ensure compliance with the established limits.
b. Market risk stress test to measure the Bank's resilience in facing extreme scenarios.
c. Risk Profile Report for Market Risk as part of risk evaluation and mitigation.

Pengungkapan kuantitatif eksposur risiko pasar sebagai berikut:

Tabel Pengungkapan Kuantitatif Eksposur Risiko Pasar dengan Menggunakan Metode Standar secara Individual.

Pengungkapan terkait *Credit Valuation Adjustment* (CVA)

1. **Proses Manajemen Risiko untuk CVA**
   CVA diidentifikasi adalah risiko yang muncul akibat perubahan nilai eksposur derivatif, yang disebabkan oleh perubahan *spread* kredit pihak lawan. Risiko ini terutama dari transaksi derivatif dengan perusahaan keuangan, pemerintah, dan entitas non-keuangan yang memiliki eksposur terhadap pergerakan pasar dan tingkat kredit. Pengukuran CVA dilakukan dengan pendekatan kuantitatif yang mempertimbangkan *Exposure at Default* (EAD), *Probability of Default* (PD), *Loss Given Default* (LGD), dan *Discount Factor* (DF).
2. **Metode yang Digunakan untuk Menentukan Besaran CVA**
   Bank menentukan besaran CVA dengan merujuk pada Surat Edaran Otoritas Jasa Keuangan No. 23/SEOJK.03/2022 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Pasar. Bank menggunakan *Standardized Approach Counterparty Credit Risk* (SA-CCR) dengan beban modal 100% dalam menentukan besaran CVA.

Metode Valuasi/*Mark-to-Market*

Salah satu aspek yang paling mendasar dalam pelaksanaan *mark-to-market* adalah prinsip kehati-hatian Bank dalam menentukan metode penilaian (valuasi) yang digunakan untuk setiap instrumen, seperti penggunaan metode *mark-to-market*, sumber informasi tentang nilai pasar yang digunakan, perlakuan terhadap instrumen yang kurang/tidak likuid, serta kebijakan pencadangan terhadap nilai keuntungan akibat proses *mark-to-market*.

Terhadap instrumen keuangan yang diperdagangkan secara aktif, proses valuasi dilakukan dengan menggunakan harga transaksi yang terjadi (*close-out prices*) atau kuotasi pasar dari sumber yang independen. Valuasi terhadap instrumen keuangan menggunakan:

1. *Bid price* untuk aset yang dimiliki atau kewajiban yang akan diterbitkan.
2. *Ask price* untuk aset yang akan diperoleh atau kewajiban yang dimiliki.

Bank dapat menetapkan nilai wajar dengan menggunakan suatu model atau teknik penilaian apabila harga pasar tidak tersedia. Valuasi dilakukan secara harian terhadap seluruh posisi *treasury*.

Quantitative disclosure of market risk exposure is as follows:

Table of Quantitative Disclosure of Market Risk Exposure by Using Standardized Method Individually.

Disclosure related to Credit Valuation Adjustment (CVA)

1. **Risk Management Process for CVA**
   CVA is identified as the risk that arises due to changes in the value of derivative exposure, which is caused by changes in counterparty's credit spread. This risk is mainly from derivative transactions with financial companies, governments, and non-financial entities that have exposure to market movements and credit levels. CVA measurement is carried out by using quantitative approach that considers Exposure at Default (EAD), Probability of Default (PD), Loss Given Default (LGD), and Discount Factor (DF).
2. **Method Used to Determine the Amount of CVA**

   The Bank determines the amount of CVA by referring to the Financial Services Authority Circular No. 23/SEOJK.03/2022 on Calculation of Risk-Weighted Assets for Market Risk. Bank Victoria applies Standardized Approach for Counterparty Credit Risk (SA-CCR) with a capital burden of 100% in determining the amount of CVA.

Valuation Method/Mark-to-Market

One of the most fundamental aspects in implementing mark-to-market is the Bank's prudential principles in determining valuation method used for each instrument, such as the use of the mark-to-market method, the source of information about market value used, the treatment of deficient/illiquid instruments, as well as reserve policies for profit values due to the mark-to-market process.

For financial instruments that are actively traded, the valuation process is carried out using close-out prices or market quotations from independent sources. Valuation of financial instruments uses:

1. Bid price for assets owned or liabilities to be issued.
2. Ask price for assets to be acquired or liabilities owned.

The Bank can determine fair value by using a valuation model or technique if market prices are not available. Valuation is carried out daily on all treasury positions.

Pengukuran Risiko Pasar pada *Trading Book* maupun *Banking Book*

Bank menerapkan beberapa metode dalam mitigasi kerugian yang mungkin timbul dari risiko pasar. Metode pengukuran risiko pasar tersebut di antaranya:

1. Bank menggunakan pendekatan standar mengacu pada ketentuan Otoritas Jasa Keuangan untuk mengukur risiko pasar. Kewajiban Penyediaan Modal Minimum dan metrik IRRBB, yaitu Nilai Eekonomis Ekuitas (EVE) dan Pendapatan Bunga Bersih (NII).
2. *Stress testing* digunakan untuk menilai kemampuan finansial di bawah kejadian-kejadian yang ekstrem tapi mungkin terjadi. Dalam analisis skenario dan *stress testing*, dapat digunakan dengan menggunakan analisis data historis, menggunakan asumsi hipotetis atau menggunakan scenario yang ditetapkan regulator.
3. Pengukuran risiko suku bunga pada posisi *banking book* paling kurang menggunakan model pengukuran *gap report*. *Gap report* menyajikan pos-pos aset, kewajiban, dan rekening administrative yang bersifat *interest rate sensitive* untuk dipetakan ke dalam skala waktu tertentu.
4. Proses kaji ulang atau validasi atas model pengukuran risiko pasar dilakukan secara berkala oleh pihak independen antara lain melalui *back testing*, termasuk melakukan penyempurnaan jika diperlukan.

Pengungkapan Mengenai *Interest Rate Risk in Banking Book*

Bank berada dalam KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021 dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan IRRBB sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk IRRBB bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada *banking book*, Bank menggunakan analisa sensitivitas berdasarkan *repricing gap* yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis Bank yang timbul dari pergerakan suku bunga yang memengaruhi permodalan dan perspektif pendapatan bunga bersih yang memengaruhi rentabilitas Bank.

Risiko Likuiditas

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuiditas berkualitas tinggi yang dapat diagunkan tanpa mengganggu aktivitas keuangan Bank. Risiko likuiditas dikategorikan menjadi:

Market Risk Measurement in Trading Book and Banking Book

The Bank applies several methods in mitigating loss that may incur from market risk. These market risk measurement methods include:

1. The Bank uses a standard approach referring to the provisions of the Financial Services Authority to measure market risk. Capital Adequacy Ratio and IRRBB metrics, namely Economic Value of Equity (EVE) and Net Interest Income (NII).
2. Stress testing is used to assess financial capabilities under extreme but possible events. Historical data analysis, hypothetical assumptions, or scenarios set by the regulator can be used to analyze scenario and stress testing.
3. Interest rate risk in banking book positions is measured at least by using the gap report measurement model. The gap report presents asset, liability, and administrative account items that are interest rate sensitive to be mapped to a certain time scale.
4. The process of reviewing or validating the market risk measurement model is carried out periodically by an independent party, among others through back testing, including making improvements if necessary.

Disclosure of Information on the Interest Rate Risk in Banking Book

The Bank is within the KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021 and does not meet the criteria to disclose calculation report of IRRBB in accordance with Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on the Implementation of Risk Management and Risk Measurement Using Standardized Approach for IRRBB for Commercial Banks. In terms of controlling the interest rate risk in banking book, the Bank uses sensitivity analysis based on the repricing gap prepared in order to fulfill the provisions on the sound rating of Commercial Banks and the implementation of risk management at Commercial Banks. This parameter may provide an indication of the risks to the Bank's economic value perspective arising from interest rate scenario movement affecting capital and net interest income perspective which affect the Bank's profitability.

Liquidity Risk

Liquidity risk is a risk due to the Bank's inability to meet its due liabilities from the funding cash flows and/or from high quality liquid assets that can be pledged, without disrupting the Bank's financial activity. The liquidity risk is categorized into:

1. Risiko likuiditas pasar
   Risiko yang timbul karena Bank tidak mampu melakukan *off setting* posisi tertentu dengan harga pasar.
2. Risiko likuiditas pendanaan
   Risiko yang timbul karena Bank tidak mampu mencairkan asetnya atau memperoleh pendanaan dari sumber dana lainnya.

Ketidakmampuan memperoleh sumber pendanaan arus kas dapat menimbulkan risiko likuiditas yang disebabkan oleh:
1. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid.
2. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana, transaksi antar Bank, dan pinjaman yang diterima.

Tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas.

Tata Kelola Pengelolaan Risiko Likuiditas

1. *Risk appetite* dan toleransi risiko dikaji oleh *Risk Taking Unit* minimal setahun sekali, serta harus mendapat persetujuan Komite Manajemen Risiko atau Direksi dan Dewan Komisaris. Setiap pelanggaran *risk appetite* dan toleransi risiko harus dieskalasi hingga ke Dewan Komisaris dan/atau tingkat Komite Dewan Komisaris terkait seperti Komite Pemantau Risiko.
2. Kebijakan manajemen risiko likuiditas harus disetujui oleh Komite Manajemen Risiko atau ALCO yang dikaji secara berkala dan memenuhi persyaratan regulasi.
3. Limit risiko likuiditas harus disetujui oleh ALCO. Limit tersebut harus dikaji paling sedikit setiap tahun dengan mempertimbangkan strategi bisnis dan *risk appetite* Bank.
4. Likuiditas Bank dikelola secara tersentralisasi oleh *Treasury*.
5. Validasi model pengukuran risiko harus dilakukan secara berkala oleh pihak yang independen dari pengembang dan pengguna model tersebut.

Struktur Organisasi Manajemen Risiko Likuiditas

Struktur organisasi manajemen risiko likuiditas telah dirancang agar dapat bekerja secara optimal dengan mengutamakan prinsip kehati-hatian melalui implementasi *dual control process* serta pemantauan secara harian atas indikator peringatan dini likuiditas Bank. Struktur organisasi manajemen risiko likuiditas diuraikan sebagai berikut:
1. Lini Pertahanan Pertama adalah semua unit bisnis.
2. Lini Pertahanan Kedua adalah Divisi Satuan Kerja Manajemen Risiko dan Divisi *Compliance, System Procedure & Coordinator Customer Protection*.
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

1. Market liquidity risk
   The risk arising due to the Bank is unable to offset certain positions at market prices.
2. Funding liquidity risk
   The risk arising due to the Bank is unable to withdraw the assets or obtain funding from other sources of funds.

Inability to acquire cash flows of source of fund can cause liquidity risk resulting from:
1. Inability to generate cash flows from earning assets or from the sale of assets including liquid assets.
2. Inability to generate cash flows from fund raising, interbank transactions, and loans.

The main objective of risk management for liquidity risk is to minimize the possibility of the Bank's inability to obtain source of fund for cash flow.

Liquidity Risk Management Governance

1. Risk appetite and risk tolerance are reviewed by the Risk Taking Unit at least once a year, and such review must obtain approval from the Risk Management Committee or the Board of Directors and Board of Commissioners. Any violation of risk appetite and risk tolerance must be escalated to the Board of Commissioners and/or the relevant Board of Commissioners Committee level, such as the Risk Monitoring Committee.
2. The liquidity risk management policy must be approved by the Risk Management Committee or ALCO, reviewed periodically and fulfilling the regulatory requirements.
3. Liquidity risk limits must be approved by ALCO. This limit must be reviewed at least annually by considering the Bank's business strategy and risk appetite.
4. The Bank's liquidity is managed centrally by the Treasury.
5. Validation of risk measurement models must be carried out periodically by parties independent of the developers and users of the model.

Liquidity Risk Management Organizational Structure

The liquidity risk management organizational structure has been designed to work optimally by prioritizing prudential principles through the implementation of dual control processes and daily monitoring of the Bank's liquidity early warning indicators. The liquidity risk management organizational structure is described below:
1. The First Line of Defense is all business units.
2. The Second Line of Defense is the Risk Management Work Unit Division and the Compliance, System Procedure & Customer Protection Coordinator Division.
3. The Third Line of Defense is SKAI Division.

Strategi Pendanaan

Strategi bidang pendanaan diprioritaskan pada upaya menjaga dan meningkatkan loyalitas nasabah dan menambah nasabah baru dengan target pertumbuhan yang berbasis struktur pendanaan yang sehat dan optimal. Strategi pendanaan di antaranya mencakup strategi diversifikasi sumber dan jangka waktu pendanaan yang dikaitkan dengan karakteristik dan Rencana Bisnis Bank. Dalam hal ini Bank mengidentifikasi dan memantau faktor utama yang memengaruhi kemampuan Bank untuk memperoleh dana, termasuk mengidentifikasi dan memantau alternatif pendanaan yang dapat memperkuat kapasitasnya untuk bertahan pada kondisi krisis.

Mitigasi Risiko Likuiditas

Dalam memitigasi risiko likuiditas, Bank menetapkan indicator peringatan dini, di antaranya dengan menentukan *risk appetite* dan *risk tolerance/limit* melalui beberapa indikator keuangan seperti rasio alat likuid terhadap dana pihak ketiga dan rasio alat likuid terhadap *non-core* deposit yang adaptif terhadap perubahan.

Stress Testing Risiko Likuiditas

Bank mengembangkan *stress testing* likuiditas untuk memastikan Bank memiliki akses sumber likuiditas yang cukup untuk bertahan pada kondisi *stress event* untuk periode tertentu yang telah ditentukan. *Stress testing* merupakan metode yang penting dalam pengelolaan likuiditas untuk memastikan Bank selalu berada pada posisi dapat memenuhi seluruh kewajibannya, membayar kembali deposan, memenuhi komitmen pemberian pinjaman, dan memenuhi komitmen lainnya yang dibuat baik dalam kondisi normal maupun stres.

Hasil *stress test* risiko likuiditas dapat menjadi masukan dalam melakukan kaji ulang terhadap kebijakan dan strategi manajemen risiko likuiditas, komposisi aset, kewajiban dan/atau rekening administratif, rencana pendanaan darurat (*contingency funding plan)* dan penetapan limit.

Pengelolaan Risiko Likuiditas pada Saat Krisis

Dalam menghadapi krisis likuiditas, Bank telah memiliki *Liquidity Contingency Plan* (LCP) yang secara formal menetapkan strategi untuk menghadapi krisis likuiditas dan prosedur untuk menutup defisit arus kas dalam situasi darurat. LCP mencakup kebijakan, strategi, prosedur dan rencana tindak untuk memastikan kemampuan Bank memperoleh sumber pendanaan yang diperlukan secara tepat waktu dan dengan biaya yang wajar. Dokumen tersebut disosialisasikan kepada unit-unit terkait agar dapat memahami tugas dan tanggung jawabnya masing-masing.

Funding Strategy

The funding strategies are prioritized on efforts to maintain and increase customer loyalty and add new customers with a growth target based on a sound and optimal funding structure. The funding strategy includes a diversification strategy of funding sources and time period that link to the Bank's characteristics and business plans. In this matter, the Bank identifies and monitors the main factors affecting the Bank's ability to obtain funds, including identifying and monitoring alternative funding that can strengthen its capacity to withstand crisis conditions.

Mitigation of Liquidity Risk

In mitigating liquidity risk, the Bank establishes early warning indicators, among others by determining risk appetite and risk tolerance/limit through several financial indicators such as the ratio of liquid assets to third party deposits and the ratio of liquid assets to non-core deposits that are adaptive to change.

Stress Testing of Liquidity Risk

The Bank develops liquidity stress testing to ensure the Bank has access to sufficient liquidity sources to survive stress event conditions for a certain predetermined period. Stress testing is an important method in managing liquidity to ensure that the Bank is always in a position to fulfill all its obligations, repay depositors, fulfill loan commitments, and fulfill other commitments made both under normal and stressed conditions.

The results of the liquidity risk stress test can be used as input for reviewing liquidity risk management policies and strategies, composition of assets, liabilities, and/or administrative accounts, contingency funding plan, and limit setting.

Liquidity Risk Management in Times of Crisis

To deal with liquidity crisis, the Bank already has a Liquidity Contingency Plan (LCP) that formally sets out strategies to deal with liquidity crisis and procedures to cover cash flow deficits in emergency situations. LCP includes policies, strategies, procedures, and action plans to ensure the Bank's ability to obtain the necessary source of fund in a timely manner and at a reasonable cost. The document is disseminated to the relevant units so that such units can understand their respective duties and responsibilities.

Pengungkapan Risiko Likuiditas

1. Pengungkapan mengenai *Liquidity Coverage Ratio* dan Aset Terikat (*Encumbrance*/ENC) mengacu pada Peraturan Otoritas Jasa Keuangan No. 19 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 tentang Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) bagi Bank Umum.
   a. Tabel Perhitungan Rasio Kecukupan Likuiditas (LCR).
   b. Tabel Pengungkapan Aset Terikat (*Encumbrance*/ENC).
2. Pengungkapan *Nett Stable Funding Ratio* Bank mengacu pada Peraturan Otoritas Jasa Keuangan No. 20 Tahun 2024 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 tentang Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio*) Bagi Bank Umum.

   Tabel Laporan Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (NSFR).

Disclosure of Liquidity Risk

1. Disclosure on Liquidity Coverage and Encumbrance (ENC) refers to the Financial Services Authority Regulation No. 19 of 2024 on Amendment to Financial Services Authority Regulation No. 42/POJK.03/2015 on the Obligation of Fulfillment of Liquidity Coverage Ratio for Commercial Banks.

   a. Liquidity Coverage Ratio (LCR) Calculation Table.

   b. Table of Disclosure of Encumbrance (ENC).

2. Disclosure of the Bank's Nett Stable Funding Ratio refers to Financial Services Authority Regulation No. 20 of 2024 on Amendment to Financial Services Authority Regulation No. 50/POJK.03/2017 on Obligation of Fulfillment of Net Stable Funding Ratio for Commercial Banks.

   Table of Report on Obligation of Fulfillment of Net Stable Funding Ratio (NSFR).

Risiko Operasional

Risiko operasional adalah risiko akibat ketidakcukupan dan/atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang memengaruhi operasional Bank.

Tujuan utama manajemen risiko untuk risiko operasional adalah untuk meminimalkan kemungkinan dampak negatif dari tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, dan/atau kejadian-kejadian eksternal.

Manajemen risiko operasional dilakukan secara konsisten terhadap kerangka kerja serta dengan menentukan strategi dan mitigasi guna memperoleh keseimbangan yang optimal antara paparan risiko operasional, efektivitas mekanisme kontrol, dan pembuatan *risk appetite*.

Struktur Organisasi Manajemen Risiko Operasional

Penerapan manajemen risiko operasional banyak melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan unit bisnis dan unit pendukung yang berperan sebagai *risk taker*.
2. Lini Pertahanan Kedua adalah Unit AML, CTF & WMD dan Divisi Satuan Kerja Manajemen Risiko.
3. Lini Pertahanan Ketiga merupakan unit yang dijalankan Divisi SKAI.

Operational Risk

Operational Risk is risk due to inadequacy and/or malfunction of internal process, human error, system failure, and/or external incidents affecting the Bank's operations.

The main objective of risk management for operational risk is to minimize the possible negative impacts of non-functioning internal processes, human errors, system failures, and/or external events.

Operational risk management is carried out consistently on framework and by determining strategies and mitigation in order to obtain maximum balance between operational risk exposure, effectiveness of control mechanism, and risk appetite establishment.

Operational Risk Management Organizational Structure

The operational risk management implementation highly involves many parties in the Bank through the implementation of 3 (three) lines of defense which function as follows:

1. First line of defense is a business unit and supporting unit that functions as risk taker.
2. Second Line of Defense is the AML, CTF & WMD Unit and Risk Management Work Unit Division.
3. Third Line Defense is a unit run by the SKAI Division.

Dalam pengelolaan risiko operasional, di samping Komite Manajemen Risiko, Bank memiliki komite lain di antaranya Komite Teknologi Informasi, Komite Pengadaan, Komite Produk, dan Komite Personalia untuk menunjang operasional Bank yang secara efektif dapat menekan kerugian akibat risiko operasional.

Mekanisme yang Digunakan Bank untuk Mengidentifikasi dan Mengukur Risiko Operasional

Proses identifikasi dan pengukuran risiko dilakukan melalui penerapan perangkat manajemen risiko operasional, yakni *risk register* dengan tujuan untuk mengidentifikasi risiko-risiko pada aktivitas fungsional risiko operasional, sehingga kerugian maksimum yang mungkin timbul di masa mendatang dapat diminimalisir. *Risk Register* yang dipergunakan untuk pelaksanaan manajemen risiko operasional sebagai berikut:

1. *Risk and Control Self-Assessment*
   Risk and Control Self-Assessment (RCSA) merupakan alat untuk mengidentifikasi dan mengukur risiko operasional yang bersifat kualitatif dan prediktif dengan menggunakan dimensi dampak dan kemungkinan kejadian. RCSA umumnya difokuskan pada risiko-risiko yang memiliki dampak terhadap kemampuan Bank dalam menjaga kelangsungan bisnis dan operasional. Proses penilaian risiko dilakukan dengan melakukan *self-assessment* tentang evaluasi tingkat risiko, yang mencakup kemungkinan kejadian, besarnya dampak, dan tingkat efektivitas kontrol. Selanjutnya, RCSA mendeteksi kecukupan internal kontrol Bank untuk mencegah penyimpangan/kegagalan yang terjadi, serta menerapkan pengendalian risiko operasional yang tepat untuk mengelola risiko operasional agar tetap berada dalam tingkatan toleransi risiko operasional.
2. *Key Risk Indicator*
   Key Risk Indicator (KRI) adalah perangkat yang lazim digunakan untuk mengidentifikasi dan menganalisis risiko sejak dini (*early warning*) atas naik-turunnya indikator-indikator tingkat risiko operasional yang melekat pada setiap aktivitas bisnis dan operasional Bank. Manfaat KRI antara lain dapat memantau dan memprediksi eksposur risiko operasional, serta mengidentifikasi perubahan profil risiko operasional. Indikator risiko utama memberikan informasi tentang risiko potensial kerugian di masa depan. Ambang batas (pemicu) dapat didefinisikan untuk KRI dan dapat berfungsi sebagai indikator dalam sistem peringatan dini.
3. *Loss Event Database*
   Loss Event Database (LED) merupakan alat/perangkat manajemen risiko operasional yang digunakan untuk mencatat/mengelola data kejadian yang telah terjadi dalam operasional Bank. *Database* kerugian, baik yang

In managing operational risk, in addition to the Risk Management Committee, the Bank has other committees including the Information Technology Committee, Procurement Committee, Product Committee, and Personnel Committee to support the Bank's operations which can effectively reduce losses due to operational risk.

Mechanism Used by the Bank to Identify and Measure Operational Risk

Risk identification and measurement process is performed by applying operational risk management tools, namely risk register aimed to identify risks in operational risk functional activities so that maximum losses that may arise in the future can be minimized. The Risk Registers used for the implementation of operational risk management are as follows:

1. Risk and Control Self-Assessment
   Risk and Control Self-Assessment (RCSA) is a tool for identifying and measuring operational risks that are qualitative and predictive using the dimensions of impact and possible events. RCSA is generally focused on risks that have an impact on the Bank's ability to maintain its business and operational sustainability. The risk assessment process is carried out by conducting self-assessment of risk level evaluation, including possible events, magnitude of impacts, and control effectiveness level. Furthermore, RCSA detects the adequacy of the Bank's internal control to prevent any deviations/failures, and to apply appropriate operational risk controls to manage operational risk in order to stay within the operational risk tolerance level.

2. Key Risk Indicator
   Key Risk Indicator (KRI) is a common tool used to identify and analyze early warning on the upward and downward movement of indicators of operational risk level that is inherent in every business activity and operation of the Bank. KRI benefits include monitoring and predicting operational risk exposures and identifying changes of operational risk profile. The main risk indicators provide information on the risk of potential losses in the future. Thresholds (triggers) can be defined for KRI and can serve as indicators in an early warning system.

3. Loss Event Database
   Loss Event Database (LED) is an operational risk management tool/instrument used to record/manage incident data occurred during the Bank's operations. The database of losses, both potential and actual, is

bersifat potensial maupun aktual merupakan prasyarat penting dalam proses penyusunan model pengukuran kerugian risiko operasional dan sebagai alat untuk melakukan validasi setiap proses penilaian risiko atau prediksi risiko.

an important prerequisite in the process of formulating measurement model of operational risk loss and as a tool for validating every risk assessment or risk prediction process.

Risiko operasional *inheren* (risiko yang melekat/*gross*) dan risiko residual diukur dengan menggunakan matriks Penilaian Risiko Operasional dengan mempertimbangkan dampak dan kemungkinan risiko itu sendiri. *Risk Taking Unit* harus mengukur bahwa kontrol memadai dan memastikan kelengkapan, keberadaan, keakuratan, otorisasi, penilaian, kepemilikan, penyajian, dan pelaporan transaksi dan/atau proses.

Inherent operational risk (gross risk) and residual risk are measured by using the Operational Risk Assessment matrix by considering the impact and possibility of the risk itself. The Risk Taking Unit must measure that controls are adequate and ensure completeness, existence, accuracy, authorization, assessment, ownership, presentation, and reporting of transactions and/or processes.

Mekanisme untuk Memitigasi Risiko Operasional

Guna memitigasi risiko operasional, Bank telah melakukan peningkatan HC melalui pendidikan dan pelatihan secara berkelanjutan. Hal tersebut bertujuan agar kemampuan karyawan dalam melaksanakan tugas dapat berjalan dengan lebih baik. Selain itu, Bank telah melakukan evaluasi dan revisi atas kebijakan dan sistem prosedur yang sudah ada, memeriksa akses level, dan limit-limit transaksi sesuai dengan tugas dan tanggung jawab masing-masing karyawan, mengembangkan teknologi informasi serta menerapkan sistem pengendalian internal.

Operational Risk Mitigation Mechanism

In order to mitigate operational risk, the Bank has increased its HC by carrying out continuous education and training. This is intended for enhancing employees' ability so that they can perform their duties properly. Furthermore, the Bank has also evaluated and revised the existing policies and system procedures, examined access level and transaction limits according to each employee's duties and responsibilities, developed information technology, and applied internal control system.

Untuk menjaga kelangsungan bisnis terhadap peristiwa yang tidak diinginkan, Bank mempunyai *Business Continuity Management* (BCM) dan juga telah memiliki *lokasi off site back up* yang digunakan pada saat pengujian BCM. Dalam penanggulangan bencana, Bank memiliki pusat data *(data center)* dan pusat penanggulangan bencana (*disaster recovery center*) yang terdapat di 2 (dua) lokasi berbeda di dalam negeri. Hal ini akan memungkinkan sistem-sistem penting, termasuk sistem inti, serta sistem pembayaran, dan sistem pelaporan regulator yang tetap berjalan jika terjadi bencana.

In order to maintain its business continuity against undesired events, the Bank has Business Continuity Management (BCM) and also already has an offsite back up location used during the BCM testing. In disaster management, the Bank has data center and disaster recovery center located in 2 (two) different locations within the country. This will enable the critical systems, including core systems, as well as payment systems, and regulatory reporting systems, to keep operating at times of disaster.

Pengungkapan Risiko Operasional

Dalam perhitungan Aset Tertimbang Menurut Risiko untuk risiko operasional, Bank mengacu kepada Peraturan Otoritas Jasa Keuangan No. 27 Tahun 2022 tentang Perubahan Kedua atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bagi Bank Umum dan Surat Edaran Otoritas Jasa Keuangan No. 06/SEOJK.03/2020 tentang Perhitungan Aset Tertimbang Menurut Risiko untuk Risiko Operasional dengan Menggunakan Pendekatan Standar bagi Bank Umum.

Disclosure of Operational Risk

In calculating Risk Weighted Assets for operational risk, the Bank refers to Financial Services Authority Regulation No. 27 of 2022 on the Second Amendment to the Financial Services Authority Regulation No.11/POJK.03/2016 on Minimum Capital Adequacy Ratio for Commercial Banks and Financial Services Authority Circular No. 06/SEOJK.03/2020 on Calculation of Risk-Weighted Assets for Operational Risk by Using Standardized Approach for Commercial Banks.

Pengungkapan Kuantitatif Eksposur Risiko sebagai berikut:
Tabel Pengungkapan Kuantitatif Risiko Operasional Bank secara Individual.

Quantitative Disclosure of Risk Exposure is as follows:
Table of Quantitative Disclosure of Operational Risk of the Bank Individually.

Risiko Hukum

Risiko hukum merupakan risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Risiko hukum dapat bersumber antara lain dari kelemahan aspek yuridis yang disebabkan oleh lemahnya perikatan yang dilakukan oleh Bank, ketiadaan dan/atau perubahan peraturan perundang-undangan yang menyebabkan suatu transaksi yang telah dilakukan Bank menjadi tidak sesuai dengan ketentuan, dan proses litigasi, baik yang timbul dari gugatan pihak ketiga terhadap Bank maupun Bank terhadap pihak ketiga.

Tujuan utama manajemen risiko untuk risiko hukum adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari kelemahan aspek yuridis, ketiadaan dan/atau perubahan peraturan perundang-undangan, dan proses litigasi.

Struktur Organisasi Manajemen Risiko Hukum

Penerapan manajemen risiko hukum banyak melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama, merupakan semua divisi.
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Legal*, dan Divisi *Compliance, System Procedure & Coordinator Customer Protection*.
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

Mekanisme Pengendalian Risiko Hukum

Langkah yang dilakukan dalam upaya mitigasi risiko hukum meliputi:

1. Standardisasi dokumen hukum terkait produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat. Dokumen tersebut dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku, serta memperhatikan kepentingan aspek yuridis dari Bank.
2. Memberikan opini hukum atas penyelenggaraan produk baru Bank sebelum diperkenalkan atau dipasarkan ke masyarakat.
3. Memantau perkembangan kasus-kasus hukum yang terjadi dan memberikan perhatian khusus atas kasus hukum yang berpotensi menimbulkan kerugian.
4. Memberikan informasi dan pengetahuan hukum kepada unit-unit terkait.
5. Memastikan perjanjian-perjanjian dan dokumen dengan nasabah dan/atau pihak ketiga lainnya dilakukan sesuai dengan ketentuan yang berlaku.
6. Melakukan evaluasi atas dokumen-dokumen atau perjanjian-perjanjian guna mengamankan kepentingan hukum Bank.
7. Meningkatkan kemampuan dan pengetahuan HC, serta pengkajian atas perkara litigasi yang telah terjadi.

Legal Risk

Legal risk is a risk as a result of lawsuits and/or weakness of juridical aspect. Legal risk can be sourced from, among others, weaknesses in the juridical aspects caused by weak commitments made by the Bank, absence and/or changes in laws and regulations that cause a transaction made by the Bank becomes not in accordance with the provisions, and litigation processes either arising from third party claims against the Bank or the Bank against third parties.

The main objective of risk management for legal risk is to ensure that the risk management process minimizes the possibility of negative impact from weakness of juridical aspects, the absence of and/or amendment to laws and regulations and litigation process.

Organizational Structure of Legal Risk Management

The legal risk management implementation highly involves many parties in the Bank through the implementation of 3 (three) lines of defense which function as follows:

1. The First Line of Defense, constitutes all divisions.
2. The Second Line of Defense, consists of the Corporate Legal Division, and Compliance, System Procedure & Coordinator Customer Protection Division.
3. The Third Line of Defense is SKAI Division.

Legal Risk Control Mechanism

Measures taken in the effort to mitigate legal risk includes:

1. Standardizing the legal documents related to banking products or facilities offered by the Bank to the public which will be made in accordance with the prevailing laws and regulations and taking into account the Bank's juridical aspect.
2. Providing legal opinion on the Bank's new products before launching or promoting to the public.
3. Monitoring the progress of legal cases and paying special attention to legal cases having the potential to cause loss.
4. Providing legal information and knowledge to relevant units.
5. Ensuring that agreements and documents with customers and/or other third parties are carried out in accordance with the applicable regulations.
6. Evaluating documents or agreements to safeguard the Bank's legal interests.
7. Increasing the capabilities and knowledge of HC, as well as reviewing litigation cases that have occurred.

Risiko Reputasi

Risiko reputasi adalah risiko yang terkait atas persepsi negatif terhadap Bank yang dapat bersumber dari berbagai kejadian yang tidak diinginkan, antara lain publikasi negatif atas operasional Bank, pelanggaran etika bisnis, keluhan nasabah, kelemahan tata kelola, dan kejadian-kejadian lainnya yang dapat mengakibatkan penurunan citra Bank.

Tujuan utama manajemen risiko untuk risiko reputasi adalah untuk mengantisipasi dan meminimalkan dampak kerugian dari risiko reputasi Bank.

Struktur Organisasi Manajemen Risiko Reputasi

Pengelolaan risiko reputasi melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan *(three lines of defense)* yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan Direksi dan seluruh karyawan.
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Secretary* dan Divisi Satuan Kerja Manajemen Risiko.
3. Lini Pertahanan Ketiga adalah Divisi SKAI.

Kebijakan dan Mekanisme dalam Rangka Meningkatkan Kualitas Pelayanan kepada Nasabah dan Pemangku Kepentingan Lainnya untuk Mengendalikan Risiko Reputasi

Bank telah membentuk layanan *contact center* yang secara khusus menangani keluhan nasabah melalui layanan telepon 24 (dua puluh empat) jam dan melakukan monitoring atas keluhan nasabah serta tindak lanjutnya. Dalam rangka pengendalian risiko reputasi, Bank melakukan beberapa hal di antaranya:

1. Tersedianya ketentuan penanganan pengaduan nasabah yang secara jelas mengatur kebijakan, prosedur, unit kerja yang melakukan pemantauan dan pelaporan seputar penanganan pengaduan nasabah.
2. Pemantauan terhadap jumlah dan penyelesaian pengaduan nasabah serta pemberitaan negatif tentang Bank Victoria.

Pengelolaan Risiko Reputasi pada Saat Krisis

1. Pengelolaan krisis komunikasi dikoordinasikan oleh pihak internal dan eksternal Bank termasuk media massa dengan alur protokol komunikasi dan penanggung jawab komunikasi.
2. Bank memiliki *business continuity plan* untuk meminimalisasi gangguan usaha Bank dan mempercepat proses pemulihan krisis pada risiko reputasi.

Reputation Risk

Reputation risk is a risk associated with negative perceptions on the Bank that can be sourced from various undesirable events, such as negative publicity of the Bank's operations, violations of business ethics, customer complaints, governance weaknesses, and other incidents that can result in a decrease image of the Bank.

The main objective of risk management for reputation risk is to anticipate and minimize the impact of losses from the Bank's reputation risk.

Organizational Structure of Reputation Risk Management

Reputation risk management involves various parties within the Bank through the implementation of 3 (three) lines of defense which function as follows:

1. The First Line of Defense is the Board of Directors and all employees.
2. The Second Line of Defense, consists of the Corporate Secretary Division and Risk Management Work Unit Division.
3. The Third Line of Defense is SKAI Division.

Policies and Mechanism in the Framework of Increasing Service Quality to Customers and Other Stakeholders to Control Reputation Risk

The Bank has established a contact center service that specifically handles customer complaints through 24 (twenty four) hour telephone service and monitors customer complaints and their follow-up. In order to control reputation risk, the Bank, among others, conducts the following matters:

1. The availability of provisions for handling customer complaints that clearly regulate policies, procedures, work units that monitor and report on the handling of customer complaints.
2. Monitoring the number and settlement of customer complaints as well as negative news about Bank Victoria.

Reputation Risk Management in Times Wof Crisis

1. The management of communication crisis coordinated by the Bank's internal and external parties, including mass media under the flow of communication protocol and the person in charge of communication.
2. The Bank has a business continuity plan to minimize the Bank's business disruption and accelerate crisis recovery process of reputation risk.

Risiko Stratejik

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau pelaksanaan suatu keputusan strategis, serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang. Risiko ini juga mencakup kemampuan Bank dalam mengembangkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat.

Tujuan utama manajemen risiko untuk risiko stratejik adalah memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif dari ketidaktepatan pengambilan keputusan stratejik dan kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Bank menetapkan dan mencapai tujuan strategis untuk memberikan hasil yang optimal bagi pemangku kepentingan dengan tetap menjaga keseimbangan antara risiko dan keuntungan, sejalan dengan perubahan kondisi makroekonomi dan kebutuhan nasabah.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko stratejik Bank.

Struktur Organisasi Manajemen Risiko Stratejik

Pengelolaan risiko stratejik melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan Direksi, *Senior Executive Vice President*, dan Unit Bisnis.
2. Lini Pertahanan Kedua, terdiri dari Divisi *Corporate Secretary*, Divisi *Accounting*, dan Divisi Satuan Kerja Manajemen Risiko.
3. Lini Pertahanan Ketiga adalah Divisi SKAI.
   Bank memiliki sistem pengendalian internal untuk manajemen risiko stratejik, mencakup pengawasan secara berkala atas kinerja Bank yang berdampak pada pendapatan usaha dan budaya pengendalian risiko stratejik yang melibatkan seluruh lini bisnis Bank.

Kebijakan Bank dalam Mengidentifikasi dan Merespons Perubahan Lingkungan Bisnis, baik Eksternal maupun Internal

Penyusunan strategi Bank dituangkan dalam rencana bisnis Bank melalui serangkaian diskusi yang melibatkan jajaran manajemen. Kebijakan umum atau arahan strategis yang dirumuskan Bank adaptif terhadap perubahan lingkungan, baik internal maupun eksternal dan dilakukan dalam perspektif jangka pendek maupun jangka menengah, yang dikaji ulang secara berkala minimal setahun sekali.

Strategic Risk

Strategic Risk is a risk as a result of incorrectness in making and/or implementing a strategic decision, as well as failure in anticipating changes in the business environment. The Bank's inability to formulate appropriate strategies may result in the failure of the Bank's business in the future. This risk also includes the Bank's ability to develop competitiveness and create a competitive advantage in the midst of the increasingly tight banking competition.

The main objective of risk management for strategic risk is to ensure that the risk management process can minimize the potential negative impact of inaccuracy of strategic decision making and failure in anticipating changes in the business environment. The Bank sets and achieves strategic objectives to provide optimal results for stakeholders while maintaining a balance between risk and profit, in line with changes in macroeconomic conditions and customer needs.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks.

Organizational Structure of Strategic Risk Management

Strategic management involves various parties within the Bank through the implementation of 3 (three) lines of defense which function as follows:

1. The First Line of Defense is the Board of Directors, Senior Executive Vice President, and Business Units.
2. The Second Line of Defense, consists of the Corporate Secretary Division, Accounting Division, and Risk Management Work Unit Division.
3. The Third Line of Defense is SKAI Division.
   The Bank has an internal control system for strategic risk management, which includes regular monitoring of the Bank's performance that have an impact on business revenues, and a strategic risk control culture that involves all of the Bank's business lines.

Bank Policies to Identify and Respond to Changes in Business Environment, External and Internal

The formulation of the Bank's strategy is set forth in the Bank's business plan through a series of discussions involving management ranks. The general policies or strategic directions formulated by the Bank are made adaptive to internal and external environment changes and carried out in a short-term and medium-term perspective, reviewed periodically at least once a year.

Bank selalu mengevaluasi kinerja bisnis dari waktu ke waktu yang disesuaikan dengan perubahan internal maupun eksternal Bank guna memperkecil risiko stratejik Bank, seperti melakukan langkah strategis di tengah ketidakpastian ekonomi dengan mempertimbangkan dan menyesuaikan beberapa aktivitas yang dilakukan secara manual atau konvensional ke dalam proses digitalisasi.

Mekanisme untuk Mengukur Kemajuan yang Dicapai dari Rencana Bisnis yang Ditetapkan

Pemantauan dan evaluasi atas pencapaian kinerja keuangan Bank terhadap target yang telah disusun mendapatkan perhatian penuh dari manajemen Bank, yang secara khusus menjadi pembahasan dalam rapat Direksi secara rutin setiap bulan atau antara Dewan Komisaris dengan Direksi.

The Bank always evaluates the business performance from time to time in accordance with the Bank's internal and external changes to minimize the Bank's strategic risks, such as taking strategic steps in the midst of economic uncertainty by considering and adjusting several activities carried out manually or conventionally to the digitalization process.

Mechanism to Measure Progress Achieved from the Defined Business Plan

Monitoring and evaluation of the Bank's financial performance achievement against the targets set have received the Bank's management full attention, which is specifically discussed in the Board of Directors' meetings regularly on a monthly basis or between the Board of Commissioners and the Board o Directors.

Risiko Kepatuhan

Risiko kepatuhan adalah risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Kegagalan dalam mengelola risiko kepatuhan tersebut dapat menyebabkan Bank terkena sanksi dan denda dari regulator serta berdampak terhadap kelangsungan usaha Bank, sehingga dapat memengaruhi tata kelola Bank.

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan. Sedangkan perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Tujuan utama manajemen risiko untuk risiko kepatuhan adalah untuk memastikan bahwa proses manajemen risiko dapat meminimalkan kemungkinan dampak negatif yang menyimpang atau melanggar standar dan/atau peraturan dan perundang-undangan yang berlaku.

Struktur Organisasi Manajemen Risiko Kepatuhan

Pengelolaan risiko kepatuhan melibatkan berbagai pihak dalam Bank melalui penerapan 3 (tiga) lini pertahanan (*three lines of defense*) yang berfungsi sebagai berikut:

1. Lini Pertahanan Pertama merupakan *Risk Taking Unit* atau unit bisnis dan/atau fungsi pendukung yang bergerak atau mendukung aktivitas penghasil pendapatan yang memiliki dan mengelola risiko.
2. Lini Pertahanan Kedua terdiri dari Divisi *Compliance, System Procedure & Coordinator Customer Protection*; Unit AML, CTF & WMD; dan Divisi Satuan Kerja Manajemen Risiko.

Compliance Risk

Compliance risk is a risk due to the Bank's failure to comply with and/or enforce the applicable laws and regulations. Failure to manage compliance risk may cause the Bank to be subject to sanctions and penalties from the regulator, and therefore, affecting the Bank's business continuity and governance.

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations. Whereas, organizational behavior is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The main objective of risk management for compliance risk is to ensure that the risk management process can minimize the possibility of negative impacts that deviates or violates the generally accepted standards and/or laws and regulations.

Organizational Structure of Compliance Risk Management

Compliance management involves various parties within the Bank through the implementation of 3 (three) lines of defense which function as follows:

1. The First Line of Defense is Risk Taking Unit or business unit and/or supporting function that operates or supports incomegenerating activities that own and manage risk.
2. The Second Line of Defense consists of the Compliance, System Procedure & Coordinator Customer Protection Division; Unit AML, CTF & WMD; and Risk Management Work Unit Division.

3. Lini Pertahanan Ketiga adalah Divisi SKAI.
   Penerapan manajemen risiko kepatuhan melibatkan berbagai pihak dalam Bank. Organisasi manajemen risiko kepatuhan melibatkan pengawasan aktif Dewan Komisaris dan Direksi yang berperan mengawasi kebijakan dan pelaksanaan fungsi kepatuhan dalam pengelolaan risiko kepatuhan serta mewujudkan terlaksananya budaya kepatuhan pada semua tingkatan organisasi dan kegiatan usaha Bank. Untuk mendukung pelaksanaan fungsi risiko kepatuhan tersebut, Bank membentuk Komite Implementasi dan Pemantauan GCG.

Strategi Manajemen Risiko dan Efektivitas Penerapan Manajemen Risiko Kepatuhan

Penerapan manajemen risiko kepatuhan disesuaikan dengan ukuran dan kompleksitas usaha Bank tidak terlepas dari pengawasan aktif Dewan Komisaris dan Direksi dalam merumuskan strategi dengan memperhatikan tingkat risiko yang akan diambil dan risiko toleransi guna mendorong terciptanya budaya kepatuhan, menetapkan sistem dan prosedur yang akan digunakan untuk penyusunan ketentuan dan pedoman internal Bank, serta melakukan tindakan pencegahan agar kebijakan dan/atau keputusan tidak menyimpang dari ketentuan dan perundang-undangan yang berlaku.

Adapun strategi yang diterapkan Bank dalam penerapan manajemen risiko kepatuhan, di antaranya sebagai berikut:

1. Arahan dari Top Manajemen, Direksi yang dikoordinasikan oleh kepatuhan mengembangkan dan mengimplementasikan budaya kepatuhan di dalam organisasi. Kepatuhan merupakan bagian dari *Key Performance Indicator* Bank dan disosialisasikan melalui pesan Direktur, pelatihan Bank, dan berbagai pendekatan lainnya.
2. Menetapkan program Kode Etik dan kepatuhan, di mana Dewan dan Manajemen Senior, dan semua staf berbagi rasa tanggung jawab untuk melindungi aset reputasi dan keuangan Bank melalui budaya perilaku etis dan kepatuhan terhadap peraturan internal dan eksternal.
3. Membangun Budaya Perusahaan yang berintegritas, yang diturunkan dari atas ke bawah. Budaya integritas adalah inti dari program etika dan kepatuhan yang efektif.
4. Penilaian risiko terhadap risiko yang signifikan dan risiko konsentrasi tertinggi dalam organisasi, dan memberikan tindakan dasar yang diperlukan untuk menghindari, memitigasi, atau memulihkan risiko tersebut.
5. Program pengujian dan pemantauan yang kuat untuk membantu memastikan lingkungan pengendalian efektif.
6. Tindakan penegakan hukum seperti pemantauan berkelanjutan terhadap kewajiban peraturan.

3. The Third Line of Defense is SKAI Division.
   The implementation of compliance risk management involves various parties within the Bank. The compliance risk management organization involves active supervision of the Board of Commissioners and the Board of Directors whose role is to oversee the policy and implementation of compliance function in managing compliance risk and realizing the implementation of a compliance culture at all levels of the organization and the Bank's business activities. To support the implementation of compliance risk function, the Bank established GCG Implementation and Monitoring Committee.

Risk Management Strategy and Effectiveness of Compliance Risk Management Implementation

The implementation of compliance risk management is adjusted to the Bank's business size and complexity, which is inseparable from the active supervision of the Board of Commissioners and Board of Directors in formulating strategies by considering the risk appetite and risk tolerance in order to promote the creation of a compliance culture, to establish system and procedure that will be used for the preparation of the Bank's internal provisions and guidelines, and to take preventive actions so that the policies and/or decisions do not deviate from the applicable provisions, laws and regulations.

Strategies implemented by the Bank in implementing compliance risk management include the following:

1. Direction from the Top Management, Board of Directors coordinated by compliance to develop and implement a culture of compliance within the organization. Compliance is part of the Bank's Key Performance Indicators and is disseminated through Board of Directors' messages, the Bank's training, and other approaches.
2. Establishing Code of Conduct and compliance program, in which the Board and Senior Management, and all staff share a sense of responsibility to protect the Bank's reputation and financial assets through a culture of ethical behavior and compliance with internal and external regulations.
3. Establishing a Company Culture with integrity, which is passed down from the top to the bottom. A culture of integrity is at the heart of an effective ethics and compliance program.
4. Risk assessment of significant risks and highest concentration risks within the organization, and providing basic actions required to avoid, mitigate, or remediate such risks.
5. A robust testing and monitoring program to help ensure an effective control environment.
6. Enforcement actions such as ongoing monitoring of regulatory obligations.

Pemantauan dan Pengendalian Risiko Kepatuhan

Pemantauan dan pengendalian yang dilakukan dalam manajemen risiko kepatuhan antara lain dengan:

1. Melakukan uji kepatuhan untuk memastikan Bank mematuhi ketentuan yang berlaku.
2. Memantau dampak finansial dan non-finansial dari ketidakpatuhan Bank terhadap regulasi secara berkala.
3. Melakukan pemantauan Kepatuhan Bulanan *Key Risk Indicator* (KRI).
4. Mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, antara lain melalui pelaksanaan sosialisasi dan pelatihan atas ketentuan dan aturan yang berlaku, serta memberikan masukan dan saran kepada unit-unit lain untuk memastikan kepatuhan Bank.
5. Memberikan nasihat kepatuhan untuk direkomendasikan/dilaksanakan kepada unit kerja terkait, sehubungan dengan masalah kepatuhan dan AML, penilaian kepatuhan atas tinjauan fasilitas kredit, serta penilaian atas permasalahan kepatuhan dalam kebijakan internal/prosedur/produk/aksi korporasi.
6. Menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem, maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku.
7. Memantau atas pelaksanaan prinsip kehati-hatian Bank.
8. Mengelola risiko kepatuhan, selain dilakukan melalui uji kepatuhan, juga dilakukan melalui pemantauan terhadap pemenuhan komitmen Bank kepada regulator, baik berdasarkan hasil pemeriksaan regulator maupun melalui korespondensi antara Bank dengan regulator.
9. Penerapan Anti-Pencucian Uang dan Pencegahan Pendanaan Terorisme di perbankan yang terdiri dari 5 (lima) prinsip utama, yaitu:
   a. Pengawasan aktif Dewan Komisaris dan Direksi.
   b. Kebijakan dan prosedur.
   c. Pengendalian internal.
   d. Sistem informasi manajemen.
   e. HC dan pelatihan.

Monitoring and Controlling Compliance Risk

Monitoring and control carried out in compliance risk management include:

1. Carrying out compliance test to ensure that the Bank complies with the applicable regulations.
2. Monitoring financial and non-financial impacts of the Bank's non-compliance with regulations on a regular basis.
3. Monitoring Monthly Key Risk Indicator (KRI) Compliance.
4. Achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, through dissemination and training on the prevailing rules and regulations, and providing input and advice to other units to ensure the Bank's compliance.
5. Providing compliance advice to be recommended/implemented to related units, in connection with compliance and AML issues, compliance assessment of credit facility reviews, as well as assessment of compliance issues in internal policies/procedures/products/corporate actions.
6. Assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations.
7. Monitoring the implementation of the Bank's prudential principles.
8. Managing compliance risk, in addition to conducting compliance tests, is also conducted through monitoring on the Bank's commitment to the regulator, either based on regulatory examination results or through correspondence between the Bank and the regulator.
9. Implementing Anti-Money Laundering and Counter-Terrorism Funding in banking consisting of 5 (five) main principles, which are:
   a. Active monitoring of the Board of Commissioners and Board of Directors.
   b. Policies and procedures.
   c. Internal control.
   d. Management information system.
   e. HC and training.

Risiko terkait Iklim

Perkembangan ekonomi global yang pesat serta meningkatnya kesadaran terhadap isu perubahan iklim telah membawa dampak signifikan pada industri perbankan. Bank Victoria menghadapi sejumlah risiko terkait iklim yang dapat memengaruhi stabilitas keuangan, reputasi, dan kontribusi terhadap perekonomian. Pemerintah berkomitmen untuk menurunkan emisi gas rumah kaca

Climate-related Risks

The rapid development of global economy and the increasing awareness of climate change issues have had a significant impact on banking industry. Bank Victoria faces a number of climaterelated risks that can affect its financial stability, reputation, and contribution to the economy. The government is committed to reducing greenhouse gas (GHG) emissions through various policies

(GRK) melalui berbagai kebijakan yang diharapkan berdampak material terhadap penurunan emisi karbon. Kebijakan ini akan berpengaruh terhadap pinjaman dan investasi yang belum memenuhi kualifikasi *nett zero emission* (NZE), khususnya dalam portofolio keuangan Bank yang terkait dengan industri penghasil emisi tinggi.

Sebagai langkah awal dalam mendukung dekarbonisasi, Bank perlu mengukur emisi karbon yang terkait dengan portofolio aset keuangannya. Integrasi risiko iklim ke dalam tata kelola, strategi bisnis, dan kerangka kerja manajemen risiko menjadi krusial dalam penerapan prinsip kehati-hatian dan transisi yang adil (*just and fair transition for all)* menuju NZE tahun 2050 atau lebih awal.

Untuk menghadapi risiko iklim, Bank mengadopsi berbagai strategi, antara lain mengimplementasikan keuangan berkelanjutan dalam portofolio bisnisnya, melakukan evaluasi risiko iklim secara terpadu untuk memahami dampak potensialnya, dan menerapkan scenario *stress test* risiko iklim guna mengukur ketahanan terhadap perubahan lingkungan. Selain itu, Bank mendukung proyek-proyek hijau dan investasi teknologi yang berkontribusi pada mitigasi perubahan iklim.

Bank perlu melakukan mitigasi terhadap risiko iklim yang dapat berdampak pada sektor perbankan. Risiko tersebut terbagi menjadi 2 (dua) kategori utama, yaitu:

1. Risiko transisi, merupakan risiko yang timbul akibat perubahan kebijakan pemerintah, kemajuan teknologi, serta dinamika sosial menuju ekonomi rendah karbon, Bank harus menyesuaikan arah kebijakan bisnisnya, yang dapat berdampak pada profitabilitas, reputasi, dan nilai aset.
2. Risiko fisik, dapat digolongkan menjadi 2 (dua), yaitu risiko akibat perubahan pola iklim dalam jangka panjang, seperti kenaikan suhu global, perubahan pola curah hujan, dan kenaikan permukaan laut.

Secara umum, dampak perubahan iklim terhadap risiko perbankan sebagai berikut:

1. Risiko kredit, dapat berdampak pada kesehatan keuangan debitur, yang berpotensi menurunkan kemampuan mereka dalam memenuhi kewajiban kredit. Dalam menghitung *Expected Credit Loss* (ECL), Bank perlu menyesuaikan indikator risiko kredit seperti *Probability of Default* (PD), *Loss Given Default* (LGD), dan *Exposure at Default* (EAD). Penyesuaian ini dilakukan dengan mempertimbangkan jangka waktu yang sesuai dengan dampak risiko iklim baik jangka pendek maupun jangka panjang. Risiko iklim juga dapat meningkatkan CKPN atas portofolio Bank, sehingga perlu dilakukan penyesuaian dalam perhitungan CKPN.

expected to have material impacts on reducing carbon emissions. This policy will affect loans and investments that do not yet meet the net zero emission (NZE) qualifications, particularly in the Bank's financial portfolio related to high-emission industries.

As the first step in supporting decarbonization, the Bank needs to measure carbon emissions associated with its financial asset portfolio. Integrating climate risk into governance, business strategy, and risk management frameworks is crucial to implementing prudential principle and a just and fair transition for all towards NZE by 2050 or earlier.

To address climate risk, the Bank adopts various strategies, including implementing sustainable finance in its business portfolio, conducting integrated climate risk assessment to understand its potential impacts, and implementing climate risk stress test scenarios to measure the resilience to environmental changes. In addition, the Bank supports the green projects and technology investments that contribute to mitigate climate change.

The Bank needs to mitigate climate risks that can impact banking sector. These risks are divided into 2 (two) main categories, namely:

1. Transition risk, is the risk that arises due to changes in government policy, technological advances, and social dynamics towards a low-carbon economy. The Bank has to adjust the direction of its business policies, which can impact its profitability, reputation, and asset value.

2. Physical risk, can be classified into 2 (two), namely risk due to changes in long-term climate patterns, such as rising global temperatures, changes in rainfall patterns, and rising sea levels.

In general, the impact of climate change on banking risk is as follows:

1. Credit risk, can impact the financial health of debtors, which has the potential to reduce their ability to meet credit obligations. In calculating Expected Credit Loss (ECL), the Bank needs to adjust credit risk indicators such as Probability of Default (PD), Loss Given Default (LGD), and Exposure at Default (EAD). This adjustment is made by considering the time period according to the impact of both short-term and long-term climate risks. Climate risk can also increase CKPN on the Bank's portfolio, and thus, adjustments need to be made in calculating CKPN.

2. Risiko pasar, ketidakpastian terhadap kondisi masa depan, termasuk perubahan cuaca ekstrem, bencana alam, fluktuasi ekonomi yang dapat menyebabkan perubahan kebijakan regulasi, sentimen investor, serta perkembangan teknologi baru. Hal ini dapat meningkatkan volatilitas pasar keuangan, sehingga berdampak pada penurunan peringkat kredit, devaluasi aset, serta efektivitas transaksi lindung nilai (*hedging*) terhadap aset yang dimiliki Bank.
3. Risiko likuiditas, dalam menghadapi risiko terkait iklim, Bank dapat berdampak pada stabilitas pendanaan Bank, termasuk arus dana keluar yang lebih besar serta potensi meningkatnya biaya pendanaan. Bank perlu memastikan kecukupan penyangga likuiditas (*buffer liquidity*) untuk mengantisipasi perubahan lingkungan bisnis akibat dampak iklim.
4. Risiko operasional, sehubungan dengan risiko terkait iklim, Bank harus memastikan bahwa kegiatan operasionalnya mampu beradaptasi terhadap risiko iklim, terutama dalam menghadapi potensi gangguan akibat perubahan lingkungan. Kemampuan Bank untuk pulih dengan cepat (*resilience*) setelah terjadi gangguan iklim sangat penting guna menjaga kelangsungan operasional.

Stress Test Risiko Iklim

Stress test atau *scenario analysis* yang dilakukan Bank Victoria terhadap risiko iklim merupakan tinjauan komprehensif mengenai bagaimana Bank mengintegrasikan risiko perubahan iklim ke dalam strategi, tata kelola, dan kerangka kerja manajemen risiko. Secara umum, hasil *stress testing* memberikan gambaran sejauh mana Bank telah memiliki kebijakan, strategi, dan mitigasi risiko yang diperlukan untuk menghadapi dampak perubahan iklim.

Salah satu faktor utama dalam *stress test* atau *scenario analysis* adalah ketersediaan dan akurasi data emisi GRK. Data ini sangat penting sebagai input utama dalam analisis skenario, khususnya dalam pengelolaan risiko transisi. Melalui pemantauan emisi usaha yang dibiayai, baik dari kredit, pinjaman, maupun investasi, Bank dapat:

1. Mengidentifikasi dan mengelola risiko iklim yang mungkin timbul akibat perubahan regulasi, teknologi, dan sentimen pasar.
2. Menentukan arah pengurangan emisi karbon dalam portofolio keuangan Bank guna mendukung target *Net Zero Emission* (NZE).
3. Mengintegrasikan dampak perubahan iklim ke dalam pengelolaan risiko, guna memastikan ketahanan bisnis Bank dalam menghadapi tantangan lingkungan dan regulasi di masa depan.

2. Market risk, uncertainty about future conditions, including extreme weather changes, natural disasters, economic fluctuations that may cause changes in regulatory policies, investor sentiment, and new technology development. These matters can increase financial market volatility, resulting in a decrease in credit rating, asset devaluation, and the effectiveness of hedging transactions on assets owned by the Bank.
3. Liquidity risk, in dealing with climate-related risks, can have an impact on the stability of the Bank's funding, including greater outflow of funds and the potential for increased funding costs. The Bank needs to ensure adequate liquidity buffers to anticipate changes in the business environment due to climate impacts.
4. Operational risk, in relation to climate-related risks, the Bank must ensure that its operational activities are able to adapt to climate risk, particularly in dealing with potential disruptions due to environmental changes. The Bank's resilience after a climate disruption is very important to maintain its operational sustainability.

Climate Risk Stress Test

The stress test or scenario analysis conducted by Bank Victoria on climate risk is a comprehensive review of how the Bank integrates climate change risk into its strategy, governance, an risk management framework. In general, the results of stress testin provide an overview of the extent to which the Bank has the policies strategies, and risk mitigation required to deal with the impacts o climate change.

One main factor in stress test or scenario analysis is the availability and accuracy of GHG emission data. This data is very importan as the main input in scenario analysis, particularly in managing transition risks. By monitoring the emissions of financed businesses including from credit, loans, and investments, the Bank can do th following matters:

1. Identify and manage climate risks that may arise due to change in regulation, technology, and market sentiment.
2. Determine the direction of carbon emission reduction in the Bank's financial portfolio to support the Net Zero Emission (NZE) target.
3. Integrate the impact of climate change into risk management, to ensure the Bank's business resilience in facing future environmental and regulatory challenges.

Integrasi Risiko terkait Iklim dalam Strategi dan Kerangka Manajemen Risiko

Risiko terkait iklim merupakan salah satu risiko yang berpotensi memengaruhi keberlanjutan usaha Bank dalam jangka pendek, jangka menengah, dan jangka panjang. Oleh karena itu, Bank mempertimbangkan risiko terkait iklim, baik yang bersifat fisik maupun transisi, dalam penyusunan strategi bisnis dan kerangka manajemen risiko secara menyeluruh.

Analisis risiko terkait iklim dilakukan dengan memperhatikan Rencana Bisnis Bank (RBB), arah kebijakan pembangunan nasional, serta target dan komitmen pemerintah sebagaimana tertuang dalam dokumen *Nationally Determined Contribution* (NDC) dan komitmen pencapaian *net zero emission*, serta dokumen lain yang ditetapkan oleh kementerian dan/atau instansi yang berwenang. Pendekatan ini bertujuan untuk memastikan bahwa strategi bisnis Bank tetap adaptif terhadap dinamika perubahan iklim dan kebijakan transisi menuju ekonomi berkelanjutan.

Bank secara bertahap mengembangkan strategi mitigasi untuk meminimalkan potensi dampak risiko terkait iklim terhadap kegiatan usaha, termasuk melalui penyesuaian kebijakan pembiayaan, penguatan manajemen risiko, serta peningkatan kesiapan organisasi dalam menghadapi perubahan lingkungan eksternal.

Integrasi risiko terkait iklim ke dalam aspek tata kelola, strategi bisnis, dan kerangka kerja manajemen risiko menjadi hal yang krusial sebagai bentuk penerapan prinsip kehati-hatian serta prinsip *just and fair transition for all* dalam mewujudkan pencapaian NZE di tahun 2050 atau lebih awal. Bank mengadopsi praktik keuangan berkelanjutan, melakukan evaluasi risiko iklim terpadu, dan mengembangkan skenario *stress test* risiko iklim untuk memahami dampak potensialnya terhadap portofolio. Selain itu, Bank juga berupaya mendukung proyek-proyek hijau dan berinvestasi dalam inovasi teknologi yang berkontribusi pada mitigasi perubahan iklim.

Tata Kelola dan Tanggung Jawab dalam Pengelolaan Risiko terkait Iklim

Pengelolaan risiko terkait iklim dilaksanakan dalam kerangka tata kelola yang selaras dengan struktur organisasi Bank. Direksi bertanggung jawab untuk menyusun kebijakan, strategi, serta memastikan implementasi pengelolaan risiko terkait iklim berjalan secara efektif dan terintegrasi dalam manajemen risiko Bank.

Integration of Climate-related Risks in the Risk Management Strategy and Framework

Climate-related risks are among the risks with potential to impact the Bank's business sustainability in the short, medium, and long term. Therefore, the Bank considers climate-related risks, both physical and transitional, in developing its comprehensive business strategy and risk management framework.

The climate-related risk analysis is conducted by considering the Bank's Business Plan (RBB), national development policy direction, government targets and commitments as outlined in the Nationally Determined Contribution (NDC) document, commitment to achieving net-zero emissions, as well as other documents set by relevant ministries and/or agencies. This approach aims to ensure that the Bank's business strategy remains adaptive to the dynamics of climate change and the transition policy towards a sustainable economy.

The Bank gradually develops mitigation strategies to minimize the potential impact of climate-related risks on business activities, including by adjusting to financing policy, strengthening risk management, and increasing organizational readiness to address changes in the external environment.

The integration of climate-related risk into aspects of governance, business strategy, and risk management framework is crucial as a form of application of the prudential principles and just and fair transition for all principle in realizing the achievement of NZE in 2050 or earlier. The bank adopts sustainable finance practices, conducts integrated climate risk evaluations, and develops climate risk stress testing scenarios to understand their potential impact on the portfolio. In addition, the Bank also seeks to support green projects and invest in technology innovations that contribute to mitigate the climate change.

Governance and Responsibilities in Climate-related Risk Management

Climate-related risk management is carried out within governance framework that is in line with the Bank's organizational structure. The Board of Directors is responsible for developing policies and strategies, and ensuring that climate-related risk management is carried out effectively and integrated into the Bank's risk management.

Dewan Komisaris melakukan pengawasan dan evaluasi atas kebijakan serta pelaksanaan pengelolaan risiko terkait iklim yang ditetapkan oleh Direksi, termasuk memberikan arahan perbaikan apabila diperlukan. Unit kerja terkait berperan sesuai dengan fungsi dan kewenangannya dalam mendukung identifikasi, pemantauan, dan pengelolaan risiko terkait iklim.

Struktur organisasi manajemen risiko yang dimiliki Bank dinilai memadai untuk mendukung pengelolaan risiko terkait iklim, dengan mekanisme koordinasi antar unit kerja yang jelas dan berjenjang.

Kebijakan, Prosedur, dan Limit Risiko terkait Iklim

Bank memiliki kebijakan dan prosedur manajemen risiko yang mencakup risiko terkait iklim sebagai bagian dari kebijakan penerapan manajemen risiko sesuai dengan ketentuan Otoritas Jasa Keuangan mengenai penerapan manajemen risiko bagi bank umum. Kebijakan dan prosedur tersebut disusun untuk memastikan risiko terkait iklim dapat diidentifikasi, diukur, dipantau, dan dikendalikan secara memadai.

Kebijakan dan prosedur terkait risiko iklim mengacu kepada Surat Keputusan Direksi No. 005/SK-DIR/03/25 tentang Kebijakan Manajemen Risiko (Kebijakan Utama Kerangka Kerja Manajemen Risiko).

Pengendalian Risiko terkait Iklim Melalui *Three Lines of Defence*

Bank memperhitungkan risiko terkait iklim dalam kerangka pengendalian internal melalui penerapan *three lines of defence*. Lini pertama, yaitu unit bisnis dan unit operasional, bertanggung jawab dalam mengelola risiko terkait iklim yang melekat pada aktivitas usaha. Lini kedua, yang mencakup fungsi manajemen risiko dan kepatuhan, berperan dalam menyusun kebijakan, melakukan pemantauan, serta memastikan kepatuhan terhadap ketentuan yang berlaku. Lini ketiga, yaitu SKAI, melakukan penilaian independen atas efektivitas penerapan pengelolaan risiko terkait iklim.

Penerapan *three lines of defence* tersebut bertujuan untuk memastikan bahwa identifikasi, pengukuran, dan mitigasi risiko terkait iklim dilakukan secara tepat, komprehensif, dan berkesinambungan.

The Board of Commissioners supervises and evaluates the policies and implementation of climate-related risk management established by the Board of Directors, including by providing guidance for improvements when necessary. Relevant units play a role in supporting the identification, monitoring, and management of climate-related risks, in accordance with their respective functions and authorities.

The Bank's risk management organizational structure is deemed adequate to support climate-related risk management, with a clear and hierarchical coordination mechanism across units.

Climate-related Risk Policies, Procedures, and Limits

The Bank has risk management policies and procedures covering climate-related risks as part of its risk management implementation policy in accordance with the Financial Services Authority regulations on risk management implementation for commercial banks. These policies and procedures are prepared to ensure that climate-related risks can be adequately identified, measured, monitored, and controlled.

Policies and procedures related to climate risk refer to the Board of Directors Decision Letter No. 005/SK-DIR/03/25 on Risk Management Policy (Main Risk Management Framework Policy).

Climate-related Risk Management Through Three Lines of Defense

The Bank calculates climate-related risks within its internal control framework through the implementation of three lines of defense. First line, namely business unit and operational unit, is responsible for managing climate-related risks inherent in business activities. Second line, which includes risk management and compliance functions, plays a role in preparing policies, monitoring, and ensuring compliance with applicable regulations. Third line, namely SKAI, carries out independent assessment of the effectiveness of climate-related risk management implementation.

The implementation of the three lines of defense aims to ensure that the identification, measurement, and mitigation of climate-related risks are carried out in an appropriate, comprehensive, and sustainable manner.

Peran masing-masing lini pertahanan dalam pengelolaan risiko terkait iklim diuraikan sebagai berikut:

1. Lini Pertahanan Pertama
   Risk Taking Unit (Bank-wide) yang terdiri dari Divisi *Change Management Office*, Divisi *Commercial Banking*, Divisi SME & *Consumer Banking*, Divisi *Credit Risk Review*, Divisi *Special Asset Management* (SAM), dan Divisi HCM & GA.
   Lini ini berfungsi pada level operasional yang merupakan pemilik proses, tanggung jawab, dan kewajiban untuk menilai, mengendalikan, serta memitigasi risiko terkait iklim.
2. Lini Pertahanan Kedua
   Risk Function Owner (RFO) terdiri dari Unit *Credit Monitoring & Collection*, Divisi *Loan & Trade Operation*, Divisi Satuan Kerja Manajemen Risiko, dan Divisi *Compliance, System Procedure, & Coordinator Customer Protection*.

   Lini ini berfungsi sebagai kontrol yang memfasilitasi, serta memonitor efektivitas implementasi dari praktik manajemen risiko yang dilakukan oleh fungsi di level operasional sekaligus membantu melaporkan semua informasi yang menyangkut mengenai risiko tersebut.
3. Lini Pertahanan Ketiga
   SKAI merupakan Lini Pertahanan Ketiga dalam Risiko iklim. SKAI berfungsi untuk melakukan tinjauan secara independen dan objektif terhadap kualitas dan efektivitas kerangka pengendalian internal dan sistem secara keseluruhan, serta kerangka pengelolaan risiko dengan memperhatikan perubahan dalam metodologi, profil bisnis dan risiko, serta kualitas data yang terkait dengan dampak risiko perubahan iklim.

Risiko Keuangan terkait Iklim dan Kecukupan *Risk Appetite*

Bank mengidentifikasi, memantau, dan mengelola risiko keuangan terkait iklim yang berpotensi memengaruhi kondisi keuangan, termasuk permodalan dan likuiditas. Risiko tersebut dipertimbangkan dalam penetapan *risk appetite* dan kerangka manajemen risiko Bank guna memastikan ketahanan keuangan Bank dalam menghadapi dampak perubahan iklim.

Pendekatan pengelolaan risiko keuangan terkait iklim dilakukan secara proporsional dengan mempertimbangkan skala usaha, kompleksitas bisnis, serta tingkat eksposur Bank terhadap risiko tersebut.

Pada tahun 2025, Bank telah menyampaikan laporan terkait *Climate Risk Stress Testing* (CRST) untuk pertama kalinya kepada regulator.

The role of every line of defense in managing climate-related risks is outlined as follows:

1. First Line of Defense
   Risk Taking Unit (Bank-wide), consisting of the Change Management Office Division, Commercial Banking Division, SME & Consumer Banking Division, Credit Risk Review Division, Special Asset Management (SAM) Division, and HCM & GA Division.
   This line serves at the operational level and is the owner of the process, responsibility, and obligation to assess, control, and mitigate climate-related risks.

2. Second Line of Defense
   Risk Function Owner (RFO) consists of Credit Monitoring & Collection Unit, Loan & Trade Operations Division, Risk Management Work Unit Division, and the Compliance, System Procedure, & Customer Protection Coordinator Division.

   This line serves as a control that facilitates and monitors the effectiveness of risk management practices carried out by functions at the operational level, while also assisting in reporting all information related to these risks.
3. Third Line of Defense
   SKAI is the Third Line of Defense for climate risk. SKAI serves to conduct independent and objective review of the quality and effectiveness of internal control framework and overall systems, as well as the risk management framework, by considering changes in methodology, business and risk profiles, and data quality related to the impact of climate change risks.

Climate-related Financial Risk and Risk Appetite Adequacy

The Bank identifies, monitors, and manages climate-related financial risks that could potentially impact its financial condition, including capital and liquidity. Such risks are considered in establishing the Bank's risk appetite and risk management framework to ensure its financial resilience in facing the impacts of climate change.

The approach to climate-related financial risk management is implemented proportionally, by considering the Bank's business scale, complexity, and level of exposure to such risks.

In 2025, the Bank submitted its first report on Climate Risk Stress Testing (CRST) to the regulators.

Evaluasi terhadap Efektivitas Manajemen Risiko

Divisi Satuan Kerja Manajemen Risiko bersama Divisi/Unit terkait secara berkala mengevaluasi implementasi sistem manajemen risiko. Evaluasi ini bertujuan untuk mengidentifikasi setiap potensi kelemahan dalam pelaksanaan pengendalian internal. Dengan demikian, Bank dapat secara proaktif mengambil langkah-langkah yang tepat untuk memperkuat strategi pengelolaan risiko, selaras dengan perkembangan dan dinamika terbaru Bank. Proses evaluasi sistem manajemen risiko memastikan bahwa Bank selalu berada di jalur yang tepat dalam menghadapi berbagai tantangan dan risiko yang ada, sekaligus meningkatkan ketahanan operasional di lingkungan bisnis yang terus berubah.

Evaluation of Risk Management Effectiveness

The Risk Management Work Unit Division, together with related Divisions/Units, periodically evaluates the implementation of risk management system. This evaluation aims to identify any potential weaknesses in the implementation of internal control. Therefore, the Bank can proactively take appropriate steps to strengthen the risk management strategy, in line with the latest developments and dynamics of the Bank. The risk management system evaluation process ensures that the Bank is always on the right track in facing various challenges and risks that exist, while increasing its operational resilience in the ever-changing business environment.

Pernyataan Dewan Komisaris dan Direksi atas Kecukupan Manajemen Risiko

Pada tahun 2025, Dewan Komisaris dan Direksi melakukan penelaahan menyeluruh terhadap pelaksanaan sistem manajemen risiko di lingkungan Bank. Hasil penelaahan tersebut menunjukkan bahwa sistem yang diterapkan telah berjalan secara efektif dalam mengidentifikasi, mengendalikan, dan merespons berbagai potensi risiko yang timbul selama periode berjalan. Ketepatan dalam penerapan kebijakan serta respons yang cepat terhadap dinamika risiko turut mendukung keberlangsungan operasional Bank tanpa menimbulkan gangguan signifikan terhadap kinerja usaha.

Statement of the Board of Commissioners and Board of Directors on the Adequacy of Risk Management

In 2025, the Board of Commissioners and Board of Directors comprehensively reviewed the implementation of the Bank's risk management system. The review results indicated that the implemented system was effective in identifying, controlling, and responding to various potential risks that emerged during the current period. The accuracy in policy implementation and rapid response to risk dynamics help support the Bank's operational continuity without causing significant disruption to its business performance.

Tabel Utama (*Key metrics*) - Bank secara Individual
Main Table (Key metrics) - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Periode Period					Description
		31 Desember 2025 31 December 2025 (Audited)	30 September 2025 30 September 2025	30 Juni 2025 30 June 2025	31 Maret 2025 31 March 2025	31 Desember 2024 31 December 2024 (Audited)	
		a	b	c	d	e	
Modal yang Tersedia (nilai) / Available Capital (value)							
1.	Modal Inti Utama (CET 1)	**4,000,450**	**4,011,666**	**4,020,965**	**3,618,146**	**3,584,008**	Common Equity Tier (CET 1)
2.	Modal Inti (*Tier* 1)	**4,000,450**	**4,011,666**	**4,020,965**	**3,618,146**	**3,584,008**	Core Capital (Tier 1)
3.	Total Modal	**5,129,996**	**4,699,770**	**4,759.314**	**4,397,796**	**4,417,941**	Total Capital
Aset Tertimbang Menurut Risiko (Nilai) / Risk Weighted Assets (Value)							
4.	Total Aset Tertimbang Menurut Risiko (ATMR)	**21,514,081**	**21,272,073**	**21,117,917**	**20,922,394**	**20,523,306**	Total Risk Weighted Assets (RWA)
Rasio Modal Berbasis Risiko dalam Bentuk Persentase dari ATMR / Risk-Based Capital Ratio as a Percentage of RWA							
5.	Rasio (CET 1) (%)	**18.59**	**18.86**	**19.04**	**17.29**	**17.46**	CET 1 Ratio (%)
6.	Rasio *Tier* 1 (%)	**18.59**	**18.86**	**19.04**	**17.29**	**17.46**	Tier 1 Ratio (%)
7.	Rasio Total Modal (%)	**23.84**	**22.09**	**22.54**	**21.02**	**21.52**	Total Capital Ratio (%)
Tambahan CET1 yang Berfungsi sebagai Buffer dalam Bentuk Persentase dari ATMR* / Additional CET1, which Functions as a Buffer as a Percentage of RWA*							
8.	*Capital Conservation buffer* (2,5% dari ATMR) (%)	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	Capital Conservation Buffer (2.5% of RWA) (%)
9.	*Countercyclical Buffer* (0 - 2,5% dari ATMR) (%)	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	Countercyclical Buffer (0-2.5% of RWA) (%)
10.	*Capital Surcharge* untuk Bank Sistemik (1% - 2,5%) (%)	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	Capital Surcharge for Systemic Banks (1%-2.5%) (%)
11.	Total CET 1 sebagai *buffer* (Baris 8 + Baris 9 + Baris 10)	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	Total CET 1 as Buffer (Row 8 + Row 9 + Row 10)
12.	Komponen CET1 untuk *buffer*	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	CET1 Components for buffer

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Periode Period					Description
		31 Desember 2025 31 December 2025 (Audited)	30 September 2025 30 September 2025	30 Juni 2025 30 June 2025	31 Maret 2025 31 March 2025	31 Desember 2024 31 December 2024 (Audited)	
		a	b	c	d	e	
Rasio Pengungkit sesuai Basel III* / Leverage Ratio According to Basel III*							
13.	Total Eksposur	**37,787,709**	**36,011,681**	**35,087,970**	**33,155,673**	**32,454,298**	Total Exposure
14.	Nilai Rasio Pengungkit, Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (Jika Ada) (%)	**11.09**	**11.49**	**11.77**	**14.07**	**11.67**	Leverage Ratio Value, Including the Impact of Adjustments to Temporary Exemptions on Current Account Placements with Bank Indonesia in Order to Meet GWM Requirements (If Any) (%)
14b.	Nilai Rasio Pengungkit, Tidak Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (Jika Ada) (%)	**10.75**	**11.14**	**11.46**	**13.26**	**11.04**	Leverage Ratio Value, Excluding the Impact of Adjustments to Temporary Exemptions on Current Account Placements with Bank Indonesia in Order to Meet GWM Requirements (If Any) (%)
14c.	Nilai Rasio Pengungkit, Termasuk Dampak dari penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (Jika Ada), yang Telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset *Securities Financing Transaction* (SFT) secara *gross* (%)	**11.09**	**11.49**	**11.77**	**14.07**	**11.67**	Leverage Ratio Value, Including the Impact of Adjustments to Temporary Exemptions on Current Account Placements with Bank Indonesia in Order to Meet GWM Requirements (If Any), which has Included the Average Value of the Gross Carrying Value of Securities Financing Transaction (SFT) Assets (%)
14d.	Nilai Rasio Pengungkit, Tidak Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan GWM (Jika Ada), yang Telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara *gross* (%)	**10.75**	**11.14**	**11.46**	**13.26**	**11.04**	Leverage Ratio Value, Excluding the Impact of Adjustments to Temporary Exemptions on Current Account Placements with Bank Indonesia in Order to Meet GWM Requirements (If Any), which has Included the Average Value of the Gross Carrying Value of SFT Assets (%)

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Periode Period					Description
		31 Desember 2025 31 December 2025 (Audited)	30 September 2025 30 September 2025	30 Juni 2025 30 June 2025	31 Maret 2025 31 March 2025	31 Desember 2024 31 December 2024 (Audited)	
		a	b	c	d	e	
Rasio Kecukupan Likuiditas (LCR) / Liquidity Adequacy Ratio (LCR)**							
15.	Total Aset Likuid Berkualitas Tinggi (HQLA)	**8,810,998**	**8,467,112**	**7,75,163.55**	**7,117,391.96**	**7,130,371.00**	Total High Quality Liquid Assets (HQLA)
16.	Total Arus Kas Keluar Bersih (*net cash outflow*)	**4,495,634**	**4,549,977**	**3,084,285.06**	**3,692,350.82**	**4,302,832.00**	Total Net Cash Outflows
17.	LCR (%)	**236.74**	**245.72**	**203.77**	**192.76**	**174.55**	LCR (%)
Rasio Pendanaan Stabil Bersih (NSFR)* / Net Stable Funding Ratio (NSFR)***							
18.	Total Pendanaan Stabil yang Tersedia (ASF)	**23,734,017**	**24,084,311**	**22,133,117.26**	**21,955,877.65**	**22,223,815.00**	Total Available Stable Funding (ASF)
19.	Total Pendanaan Stabil yang Diperlukan (RSF)	**19,093,874**	**18,055,360**	**17,775,344.46**	**16,835,551.83**	**2,107,074.00**	Total Required Stable Funding (RSF)
20.	NSFR (%)	**124.30**	**133.39**	**124.52**	**130.41**	**133.90**	NSFR (%)

Analisis Kualitatif
Qualitative Analysis

1. *Capital Adequency Ratio* (CAR) pada 31 Desember 2025 adalah sebesar 23,84 %, naik 1,75% dari posisi 30 September 2025. Peningkatan ini disebabkan adanya peningkatan total modal yang terjadi bulan desember tahun 2025. Rasio Total Modal berada di atas ketentuan regulator yaitu paling rendah sebesar 8%.
2. *Leverage Ratio* pada 31 Desember 2025 adalah sebesar 10,75% atau berada diatas ketentuan Otoritas Jasa Keuangan yaitu paling rendah sebesar 3% sebagaimana yang diwajibkan di Peraturan Otoritas Jasa Keuangan No. 31/POJK.03./2019.

1. The Capital Adequacy Ratio (CAR) as of 31 December 2025 was 23.84%, increasing by 1.75% from 30 September 2025. This increase was due to the increase in total capital in December 2025. The Total Capital Ratio was above the minimum regulatory requirement of 8%.
2. The Leverage Ratio as of 31 December 2025 was 10.75%, exceeding the minimum requirement of 3% set by Financial Services Authority as stipulated in Financial Services Authority Regulations No. 31/POJK.03./2019.

* Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 31/POJK.03/2019 / Quantitative disclosures are in accordance with Financial Services Authority Regulation No. 31/POJK.03/2019
** Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 42/POJK.03/2015 / Quantitative disclosures are in accordance with Financial Services Authority Regulation No. 42/POJK.03/2015
*** Pengungkapan kuantitatif sesuai Peraturan Otoritas Jasa Keuangan No. 50/POJK.03/2017 / Quantitative disclosures are in accordance with Financial Services Authority Regulation No. 50/POJK.03/2017

Tabel Perbedaan antara Cakupan Konsolidasi dan *Mapping* pada Laporan Keuangan sesuai Standar Akuntansi Keuangan dengan Kategori Risiko sesuai dengan Ketentuan Otoritas Jasa Keuangan Kategori Risiko (LI 1)

Table of Difference between Consolidated and Mapping Coverage on the Financial Statements in accordance with the Financial Accounting Standards with Risk Categories in accordance with the Financial Services Authority Provisions for Risk Category (LI 1).

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
Kas Cash	46,336	46,336	46,336	-	-	-	-
Penempatan pada Bank Indonesia Placements with Bank Indonesia	1,238,091	1,238,091	1,238,091	-	-	-	-
Penempatan pada Bank lain Placements with Other Banks	1,722,376	1,722,376	1,722,376	-	-	-	-
Tagihan *Spot* dan Derivatif/ *Forward* Spot and Derivative/Forward Receivables	278	278	-	-	-	-	278
Surat Berharga yang Dimiliki Securities	10,075,612	10,075,612	10,075,349	-	262	-	1
Surat Berharga yang Dijual dengan Janji Dibeli Kembali (*repo*) Securities Sold Under Repurchase Agreement (Repo)	-	-	-	-	-	-	-

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
Tagihan atas Surat Berharga yang Dibeli dengan Janji Dijual Kembali (*Reverse Repo*) Receivables from Securities Purchased Under Resale Agreement (Reverse Repo)	-	-	-	-	-	-	-
Tagihan Akseptasi Acceptances Receivable	21,291	21,291	21,291	-	-	-	-
Kredit yang Diberikan Loans	22,380,166	22,380,166	22,380,166	-	-	-	-
Pembiayaan Syariah Sharia Financing	-	-	-	-	-	-	-
Penyertaan Modal Equity Participation	-	-	-	-	-	-	-
Aset Keuangan Lainnya Other Financial Assets	325,114	325,114	365,356	-	-	-	(40,242)
Cadangan Kerugian Penurunan Nilai Aset Keuangan -/- Allowance for Impairment Losses on Financial Assets -/-							
a. Surat berharga yang Dimiliki Securities	(1,153)	(1,153)	-	-	-	-	(1,153)
b. Kredit yang Diberikan dan Pembiayaan Syariah Loans and Sharia Financing	(558,646)	(558,646)	(462,066)	-	-	-	(96,580)

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
c. Lainnya Others	(74)	(74)	-	-	-	-	(74)
Aset Tidak Berwujud Intangible Assets	37,657	37,657	-	-	-	-	37,657
Akumulasi Amortisasi Aset Tidak Berwujud -/- Accumulated Amortisation of Intangible Assets -/-	(24,015)	(24,015)	-	-	-	-	(24,015)
Aset Tetap dan Inventaris Fixed Assets and Inventory	486,379	486,379	423,227	-	-	-	63,152
Akumulasi Penyusutan Aktiva Tetap dan Inventaris -/- Accumulated Depreciation of Fixed Assets and Inventory -/-	(104,749)	(104,749)	-	-	-	-	(104,749)
Aset Non-Produktif Non-Earning Assets	-						
a. Properti Terbengkalai Abandoned Property	31,149	31,149	-	-	-	-	31,149
b. Agunan yang Diambil Alih Foreclosed assets	295,723	295,723	295,723	-	-	-	-
c. Rekening Tunda Suspense Accounts	1,649	1,649	-	-	-	-	1,649
d. Aset Antarkantor Inter-Branch Assets	-	-	-	-	-	-	-
Aset Lainnya Other Assets	228,512	228,512	116,725	-	-	-	111,787
Total Aset Total Assets	**36,201,697**	**36,201,697**	**36,222,574**	**-**	**262**	**-**	**(21,139)**

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
LIABILITAS DAN EKUITAS / LIABILITIES AND EQUITY							
LIABILITAS / LIABILITIES							
Giro Demand Deposits	3,350,471	3,350,471	-	-	-	-	1,327,022
Tabungan Savings Deposits	3,775,826	3,775,826	-	-	-	-	3,158,543
Deposito Time Deposits	17,168,401	17,168,401	-	-	-	-	14,821,300
Uang Elektronik Electronic Money	-	-	-	-	-	-	-
Liabilitas kepada Bank Indonesia Liabilities to Bank Indonesia	-	-	-	-	-	-	-
Liabilitas kepada Bank Lain Liabilities to Other Banks	2,580,560	2,580,560	-	-	-	-	1,045,673
Liabilitas Spot dan Derivatif/ *Forward* Spot and Derivative/Forward Liabilities	3,551	3,551	-	-	-	-	21
Liabilitas atas Surat Berharga yang Dijual dengan Janji Dibeli Kembali (*repo*) Liabilities on Securities Sold Under Repurchase Agreement (repo)	693,569	693,569	-	-	-	-	-
Liabilitas Akseptasi Acceptances Payable	21,291	21,291	-	-	-	-	-

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
Surat Berharga yang Diterbitkan Securities Issued	3,922,381	3,922,381	-	-	-	-	498,308
Pinjaman/Pembiayaan yang Diterima Borrowings	-	-	-	-	-	-	900,212
Setoran Jaminan Guarantee Deposits	-	-	-	-	-	-	-
Liabilitas Antarkantor Inter-branch Liabilities	-	-	-	-	-	-	-
Liabilitas Lainnya Other Liabilities	316,725	316,725	-	-	-	-	181,640
Kepentingan Minoritas (*Minority Interest*) Minority Interest	-	-	-	-	-	-	17
Total Liabilitas Total Liabilities	31,832,776	31,832,776	-	-	-	-	31,832,776
EKUITAS / EQUITY							
Modal Disetor Paid-In Capital							
a. Modal Dasar Authorized Capital	4,100,000	4,100,000	-	-	-	-	4,100,000
b. Modal yang Belum Disetor -/- Unpaid Capital -/-	(2,258,058)	(2,258,058)	-	-	-	-	(2,258,058)

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
c. Saham yang Dibeli Kembali (Treasury Stock) -/- Treasury Stocks -/-	-	-	-	-	-	-	-
Tambahan Modal Disetor Additional Paid-In Capital							
a. Agio Agio	667,789	667,789	-	-	-	-	667,789
b. Disagio -/- Disagio -/-	-	-	-	-	-	-	-
c. Dana Setoran Modal Capital Deposit Fund	-	-	-	-	-	-	-
d. Lainnya Others	-	-	-	-	-	-	-
Penghasilan Komprehensif Lain Other Comprehensive Income							
a. Keuntungan Gain	332,074	332,074	-	-	-	-	332,074
b. Kerugian -/- Loss -/-	-	-	-	-	-	-	-
Cadangan Reserve							
a. Cadangan Umum General Reserves	252,200	252,200	-	-	-	-	252,200
b. Cadangan Tujuan Appropriated Reserves	-	-	-	-	-	-	-

(dalam juta Rupiah / in million Rupiah)

Aset Assets	Nilai Tercatat sebagaimana Tercantum dalam Publikasi Laporan Keuangan Carrying Value as Stated in Published Financial Statements	Nilai Tercatat berdasarkan Prinsip Kehati-Hatian Carrying Value based on Prudential Principle	Nilai Tercatat Masing-Masing Risiko Carrying Value of Each Risk				
			Sesuai Kerangka Risiko Kredit In Accordance with Credit Risk Framework	Sesuai Kerangka *Counterparty Credit Risk* In Accordance with Counterparty Credit Risk Framework	Sesuai Kerangka Sekuritisasi In Accordance with Securitization Framework	Sesuai Kerangka Risiko Pasar In Accordance with Market Risk Framework	Tidak Mengacu pada Persyaratan Permodalan atau berdasarkan Pengurangan Modal Not Refer to Capital Requirements or Based on Capital Reduction
	a	b	c	d	e	f	g
Laba/Rugi Profit/Loss							
a. Tahun-Tahun Lalu Previous Years	1,143,172	1,143,172	-	-	-	-	1,143,172
b. Tahun Berjalan For the Year	131,745	131,745	-	-	-	-	131,745
c. Dividen yang Dibayarkan -/- Total Ekuitas yang dapat Diatrebusikan kepada Pemilik Dividend Paid -/- Total Equity Redeemable to Owners	-	-	-	-	-	-	-
Total Ekuitas Total Equity	**4,368,921**	**4,368,921**	**-**	**-**	**-**	**-**	**4,368,921**
Total Liabilitas dan Ekuitas Total Liabilities and Equity	**36,201,697**	**36,201,697**	**-**	**-**	**-**	**-**	**36,201,697**

Analisis Kualitatif
Qualitative Analysis

Tabel Perbedaan Utama antara Nilai Tercatat sesuai Standar Akuntansi Keuangan dengan Nilai Eksposur sesuai dengan Ketentuan Otoritas Jasa Keuangan (LI 2)

Table of Key Differences between Carrying Value in Accordance with the Financial Accounting Standards and Exposure Value in accordance with Financial Services Authority Regulations (LI 2)

(dalam juta Rupiah / in million Rupiah)

	Total	Kerangka Risiko Kredit Credit Risk Framework	Kerangka sekuritisasi Securitization framework	Kerangka *Counterparty credit risk* Counterparty credit risk framework	Kerangka risiko pasar Market risk framework	
	a	b	c	d	e	
Nilai Tercatat Aset sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-Hatian (sebagaimana Dilaporkan pada Tabel LI 1)	**36,201,697**	36,222,575	262	-	-	Asset Carrying Value in Accordance with Consolidation Scope of Prudential Regulations (as Reported in Table LI 1)
Nilai Tercatat Liabilitas sesuai Lingkup sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-Hatian (sebagaimana Dilaporkan pada Tabel LI 1)	**31,832,776**	-	-	-	-	Liabilities Carrying Value in Accordance with Consolidation Scope of Prudential Regulations (as Reported in Table LI1)
Total Nilai Bersih sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-Hatian	**4,368,921**	36,222,575	262	-	-	Total Net Value in Accordance with Consolidation Scope of Prudential Regulations
Nilai Rekening Administratif	**7,008,658**	7,008,658	-	-	-	Administrative Account Value
Perbedaan Valuasi	**-**	-	-	-	-	Difference in Valuation
Perbedaan antara Netting Rules, Selain dari yang Termasuk pada Baris 2	**-**	-	-	-	-	Differences between Netting Rules, Aside from those Included in Line 2
Perbedaan Provisi	**-**	-	-	-	-	Difference in Provisions
Perbedaan *Prudential Filters*	**-**	-	-	-	-	Difference in Prudential Filters
Nilai Eksposur yang Dipertimbangkan, sesuai dengan Cakupan Konsolidasi Ketentuan Kehati-Hatian	**-**	**-**	**-**	**-**	-	**The Exposure Value Considered, in Accordance with Consolidation Scope of Prudential Regulations**

Tabel Penjelasan Mengenai Perbedaan Antara Nilai Eksposur sesuai Standar Akuntansi Keuangan dengan Ketentuan Otoritas Jasa Keuangan (LIA)
Table of Explanation on the Differences between the Exposure Values in Accordance with the Financial Accounting Standards and Financial Services Authority Provisions (LIA)

Tidak Terdapat Perbedaan Antara Nilai Tercatat Sesuai Standar Akuntansi Keuangan, Sebagaimana Dilaporkan Pada Laporan Keuangan dan Nilai Eksposur Sesuai Ketentuan Kehati-hatian
There Is No Difference Between The Recorded Value According To Financial Accounting Standards, As Reported In The Financial Statements and The Exposure Value According To Prudential Regulations

Tabel Komposisi Permodalan (CC1) - Bank secara individual
Table of Capital Composition (CC1) - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	31 Desember 2025 31 December 2025	Component
Modal Inti Utama (*Common Equity Tier I*)/CET 1: Instrumen dan Tambahan Modal Disetor / Common Equity Tier I Capital: Instruments and Reserves			
1.	Saham Biasa (Termasuk *stock surplus*)	**2,509,731**	Directly Issued Qualifying Common Share (and Equivalent for Non-Joint Stock Companies) Capital Plus Related Stock Surplus
2.	Laba Ditahan	**1,274,917**	Retained Earnings
3.	Akumulasi Penghasilan Komprehensif Lain (dan Cadangan Lain)	**551,510**	Accumulated Other Comprehensive Income (and Other Reserves)
4.	Modal yang Termasuk *Phase Out* dari Cet 1	**N/A**	Directly Issued Capital Subject to Phase Out from CET 1 (Only Applicable to Non-Joint Stock Companies)
5.	Kepentingan Non-Pengendali yang Dapat Diperhitungkan	**-**	Common Share Capital Issued by Subsidiaries and Held by Third Parties (Amount Allowed in Group CET 1)
6.	CET 1 sebelum *Regulatory Adjustment*	**4,000,450**	Common Equity Tier 1 Capital Before Regulatory Adjustments
CET 1: Faktor Pengurang (*Regulatory Adjustment*) / Common Equity Tier 1 Capital: regulatory adjustments			
7.	Selisih kurang jumlah penyesuaian nilai wajar dari instrumen keuangan dalam *Trading Book*	**-**	Prudential Valuation Adjustments
8.	*Goodwill* (setelah dikurangi kewajiban pajak terkait)	**-**	Goodwill (Net of Related Tax Liability)
9.	Aset Tidak Berwujud Lainnya (Selain *Mortgage-Servicing Rights*)	**(13,642)**	Other Intangibles Other than Mortgage-Servicing Rights (Net of related Tax Liability)
10.	Aset Pajak Tangguhan yang Berasal dari *Future Profitability*	**N/A**	Deferred Tax Assets that Rely on Future Profitability Excluding those Arising from Temporary Differences (Net of related Tax Liability)
11.	*Cash-Flow Hedge Reserve*	**N/A**	Cash-Flow Hedge Reserve
12.	*Shortfall on Provisions to Expected Losses*	**N/A**	Shortfall on Provisions to Expected Losses
13.	Keuntungan Penjualan Aset dalam Transaksi Sekuritisasi	**-**	Securitisation Gain on Sale (as Set Out in Paragraph 562 of Basel II Framework)
14.	Peningkatan/ Penurunan Nilai Wajar atas Kewajiban Keuangan (DVA)	**-**	Gains and Losses Due to Changes in Own Credit Risk on Fair Valued Liabilities
15.	Aset Pensiun Manfaat Pasti	**N/A**	Defined-Benefit Pension Fund Net Assets

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	31 Desember 2025 31 December 2025	Component
16.	Investasi Pada Saham Sendiri (Jika Belum di *Net* dalam Modal di Laporan Posisi Keuangan)	**N/A**	Investments in Own Shares (If Not Already Netted off Paid-In Capital on Reported Balance Sheet)
17.	Kepemilikan Silang pada Instrumen CET 1 pada Entitas Lain	-	Reciprocal Crossholdings in Common Equity
18.	Investasi pada Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan, *Net* Posisi *Short* yang Diperkenankan, Dimana Bank Tidak Memiliki Lebih dari 10% Modal Saham yang Diterbitkan (Jumlah di Atas Batasan 10%)	**N/A**	Investments in the Capital of Banking, Financial and Insurance Entities that are Outside the Scope of Regulatory Consolidation, Net of Eligible Short Positions, where the Bank Does Not Own More than 10% of the Issued Share Capital (Amount above 10% Threshold)
19.	Investasi Signifikan pada Saham Biasa Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan, *Net* Posisi *Short* yang Diperkenankan (Jumlah di Atas Batasan 10%)	**N/A**	Significant Investments in the Common Stock of Banking, Financial and Insurance Entities that are Outside the Scope of Regulatory Consolidation, Net of Eligible Short Positions (Amount Above 10% Threshold)
20.	*Mortgage Servicing Rights*	-	Mortgage Servicing Rights (Amount Above 10% Threshold)
21.	Aset Pajak Tangguhan Yang Berasal Dari Perbedaan Temporer (Jumlah Di Atas Batasan 10%, *Net* Dari Kewajiban Pajak)	**N/A**	Deferred Tax Assets Arising From Temporary Differences (Amount Above 10% Threshold, Net Of Related Tax Liability)
22.	Jumlah Melebihi Batasan 15% dari:	**N/A**	Amount Exceeding the 15% Threshold
23.	Investasi Signifikan pada Saham Biasa Financials	**N/A**	Of which: Significant Investments In the Common Stock of Financials
24.	*Mortgage servicing rights*	**N/A**	Of which: Mortgage Servicing Rights
25.	Pajak Tangguhan dari Perbedaan Temporer	**N/A**	Of which: Deferred Tax Assets Arising From Temporary Differences
26.	Penyesuaian berdasarkan Ketentuan Spesifik Nasional		National Specific Regulatory Adjustments
26a.	Selisih PPKA dan CKPN	-	Difference between PPAP and CKPN
26b.	PPKA non-produktif	**(257,262)**	PPAP for Non-Earning Assets
26c.	Aset Pajak Tangguhan	**(93,096)**	Deferred Tax Assets
26d.	Penyertaan	-	Equity Investments
26e.	Kekurangan Modal pada Perusahaan Anak Asuransi	**N/A**	Capital Deficiency in Insurance Subsidiaries
26f.	Eksposur Sekuritisasi	-	Securitization Exposures
26g.	Lainnya	-	Others
27.	Penyesuaian pada CET 1 Akibat AT 1 dan *Tier* 2 Lebih Kecil Daripada Faktor Pengurangnya	-	Regulatory Adjustments Applied to Common Equity Tier 1 due to Insufficient Additional Tier 1 and Tier 2 to Cover Deductions
28.	**Jumlah Pengurang (*Regulatory Adjustment*) terhadap CET 1**	**(364,000)**	**Total Regulatory Adjustments to Common Equity CET 1**
29.	**Jumlah CET 1 Setelah Faktor Pengurang**	**3,636,450**	**Common Equity Tier 1 capital (CET1)**
Modal Inti Tambahan (AT 1): Instrumen / Additional Tier 1 capital: instruments			
30.	Instrumen AT 1 yang Diterbitkan oleh Bank (Termasuk *Stock Surplus*)	-	Directly Issued Qualifying Additional Tier 1 Instruments Plus related Stock Surplus
31.	Yang Diklasifikasikan sebagai Ekuitas berdasarkan Standar Akuntansi	-	Of which: Classified as Equity Under Applicable Accounting Standards

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	31 Desember 2025 31 December 2025	Component
32.	Yang Diklasifikasikan sebagai Liabilitas berdasarkan Standar Akuntansi	-	Of which: Classified as Liabilities Under Applicable Accounting Standards
33.	Modal yang Termasuk *Phase Out* dari AT 1	N/A	Directly Issued Capital Instruments Subject to Phase Out from Additional Tier 1
34.	Instrumen AT 1 yang Diterbitkan oleh Entitas Anak yang Diakui dalam Perhitungan KPMM secara Konsolidasi	-	Additional Tier 1 Instruments (and CET1 Instruments Not Included in Row 5) Issued by Subsidiaries and Held by Third Parties (Amount Allowed in Group AT1)
35.	Instrumen yang Diterbitkan Entitas Anak yang termasuk *Phase Out*	N/A	Of which: Instruments Issued by Subsidiaries Subject to Phase Out
36.	**Jumlah AT 1 Sebelum *Regulatory Adjustment***	-	**Additional Tier 1 Capital Before Regulatory Adjustments**
Modal Inti Tambahan: Faktor Pengurang (*Regulatory Adjustment*) / Additional Tier 1 Capital: Regulatory Adjustments			
37.	Investasi pada Instrumen AT 1 Sendiri	N/A	Investments in Own Additional Tier 1 Instruments
38.	Kepemilikan Silang pada Instrumen AT 1 pada Entitas Lain	-	Reciprocal Crossholdings in Additional Tier 1 Instruments
39.	Investasi pada Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan, *Net* Posisi *Short* yang Diperkenankan, dimana Bank Tidak Memiliki Lebih dari 10% Modal Saham yang Diterbitkan (Jumlah di Atas Batasan 10%)	N/A	Investments in the Capital of Banking, Financial and Insurance Entities that are Outside the Scope of Regulatory Consolidation, Net of Eligible Short Positions, Where the Bank Does Not Own More than 10% of the Issued Common Share Capital of the Entity (Amount Above 10% Threshold)
40.	Investasi Signifikan pada Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan (*Net* Posisi *Short* yang Diperkenankan)	N/A	Significant Investments in the Capital of Banking, Financial and Insurance Entities that are Outside the Scope of Regulatory Consolidation (Net of Eligible Short Positions)
41.	Penyesuaian berdasarkan Ketentuan Spesifik Nasional		National Specific Regulatory Adjustments
41a.	Penempatan Dana pada Instrumen AT 1 pada Bank Lain	-	Exposure to Additional AT1 Capital Instruments Issued by Other Banks
42.	Penyesuaian pada AT 1 Akibat *Tier* 2 Lebih Kecil Daripada Faktor Pengurangnya	-	Regulatory Adjustments Applied to Additional Tier 1 due to Insufficient Tier 2 to Cover Deductions
43.	**Jumlah Faktor Pengurang (*Regulatory Adjustment*) terhadap AT 1**	-	**Total Regulatory Adjustments to Additional Tier 1 Capital**
44.	**Jumlah AT 1 Setelah Faktor Pengurang**	-	Additional Tier 1 capital (AT1)
45.	**Jumlah Modal Inti (*Tier* 1) (CET 1 + AT 1)**	3,636,450	**Tier 1 Capital (T1 = CET 1 + AT 1)**
Modal Pelengkap (Tier 2): Instrumen dan Cadangan / Tier 2 Capital: Instruments and Provisions			
46.	Instrumen *Tier* 2 yang Diterbitkan oleh Bank (Termasuk *Stock Surplus*)	888,500	Directly Issued Qualifying Tier 2 Instruments Plus Related Stock Surplus
47.	Modal yang Termasuk *Phase Out* dari *Tier* 2	N/A	Directly Issued Capital Instruments Subject to Phase Out from Tier 2
48.	Instrumen *Tier* 2 yang Umum PPKA atas Aset Produktif yang Wajib Dihitung dengan Jumlah Paling Tinggi Sebesar 1,25% dari ATMR untuk Risiko Kredit	-	The Common Tier 2 Instrument for PPKA on Earning Assets that Must be Calculated at a Maximum Amount of 1.25% of RWA for Credit Risk
49.	Modal yang Diterbitkan Entitas Anak yang Termasuk *Phase Out*	N/A	Of which: Instruments Issued by Subsidiaries Subject to Phase Out
50.	Cadangan Umum PPKA atas Aset Produktif yang Wajib Dihitung dengan Jumlah Paling Tinggi Sebesar 1,25% dari ATMR untuk Risiko Kredit	241,045	Provisions
51.	**Jumlah Modal Pelengkap (*Tier 2*) Sebelum Faktor Pengurang**	1,129,545	**Tier 2 Capital Before Regulatory Adjustments**

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	31 Desember 2025 31 December 2025	Component
Modal Pelengkap (*Tier* 2): Faktor Pengurang (*Regulatory Adjustment*) / Tier 2 Capital: Regulatory Adjustments			
52.	Investasi pada Instrumen *Tier* 2 Sendiri	**N/A**	Investments in Own Tier 2 Instruments
53.	Kepemilikan Silang pada Instrumen *Tier* 2 pada Entitas Lain	**N/A**	Reciprocal Crossholdings in Tier 2 Instruments and Other TLAC Liabilities
54.	Investasi pada Kewajiban TLAC Modal Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi secara Ketentuan, *Net* Posisi *Short* yang Diperkenankan, di mana Bank Tidak Memiliki Lebih dari 10% Modal Saham yang Diterbitkan; Nilai Sebelumnya Ditetapkan dengan *Threshold* 5% namun tidak lagi Memenuhi Kriteria (untuk Bank Sistemik)	**N/A**	Investments in the Other TLAC Liabilities of Banking, Financial and Insurance Entities that are Outside the Scope of Regulatory Consolidation and where the Bank Does Not Own More than 10% of the Issued Common Share Capital of the Entity: Amount Previously Designated for the 5% Threshold but that No Longer Meets the Conditions (for G-SIBs Only)
55.	Investasi Signifikan pada Modal atau Instrumen TLAC Bank, Entitas Keuangan dan Asuransi di Luar Cakupan Konsolidasi Secara Ketentuan (*Net* Posisi *Short* yang Diperkenankan)	**N/A**	Significant Investments in the Capital and Other TLAC Liabilities of Banking, Financial and Insurance Entities that are Outside the Scope of Regulatory Consolidation (Net of Eligible Short Positions)
56.	Penyesuaian berdasarkan Ketentuan Spesifik Nasional		National Specific Regulatory Adjustments
56a.	*Sinking Fund*	**-**	Sinking Fund
56b.	Penempatan Dana pada Instrumen *Tier* 2 pada Bank Lain	**-**	Exposure to Tier 2 Capital Instruments Issued by Other Banks
57.	**Jumlah Faktor Pengurang (*Regulatory Adjustment*) Modal Pelengkap**	**-**	**Total Regulatory Adjustments to Tier 2 Capital**
58.	**Jumlah Modal Pelengkap (*Tier* 2) Setelah *Regulatory Adjustment***	**1,129,545**	**Tier 2 Capital (T 2)**
59.	**Total Modal (Modal Inti + Modal Pelengkap)**	**4,765,995**	**Total Capital (TC = T 1 + T 2)**
60.	**Total Aset Tertimbang Menurut Risiko (ATMR)**	**21,514,081**	**Total Risk Weighted Assets (RWA)**
Rasio Kecukupan Pemenuhan Modal Minimum (KPMM) dan Tambahan Modal (*Capital Buffer*) / Capital Ratios and Buffers			
61.	**Rasio CET 1 (Persentase terhadap ATMR)**	**18.59**	**CET 1 (as a Percentage of RWA)**
62.	**Rasio Modal Inti Tier 1 (Persentase terhadap ATMR)**	**18.59**	**Tier 1 (as a Percentage of RWA)**
63.	**Rasio Total Modal (Persentase terhadap ATMR)**	**23.84**	**Total Capital (as a Percentage of RWA)**
64.	***Buffer* (Persentase terhadap ATMR)**	**N/A**	**Buffer (Percentage of RWA)**
65.	*Capital Conservation Buffer*	**N/A**	Capital Conservation Buffer
66.	*Countercyclical Buffer*	**N/A**	Countercyclical Buffer
67.	*Higher Loss Absorbency Requirement*	**N/A**	Higher Loss Absorbency Requirement
68.	Untuk Bank Umum Konvensional: CET 1 yang Tersedia untuk Memenuhi *Buffer* (Persentase terhadap ATMR) untuk Kantor Cabang dari Bank yang Berkedudukan di Luar Negeri: Bagian Dana Usaha yang Ditempatkan dalam CEMA (Diungkapkan sebagai Persentase dari ATMR) yang Tersedia untuk Memenuhi *Buffer*	**-**	CET 1 Available to Meet Buffers (as a Percentage of RWA)

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	31 Desember 2025 31 December 2025	Component
***National Minima* (jika Berbeda dari *Basel* 3) / National Minima (if Different from Basel 3)**			
69.	Rasio Terendah CET 1 Nasional (jika Berbeda dengan *Basel* 3)	**N/A**	National CET 1 Minimum Ratio (if Different from Basel 3 minimum)
70.	Rasio Terendah Tier 1 Nasional (jika berbeda dengan *Basel* 3)	**N/A**	National Tier 1 Minimum Ratio (if Different from Basel 3 Minimum)
71.	Rasio Terendah Total Modal Nasional (jika Berbeda dengan *Basel* 3)	**N/A**	National Total Capital Minimum Ratio (if different from Basel 3 minimum)
Jumlah di Bawah Batasan Pengurangan (Sebelum Pembobotan Risiko) / Amounts Below the Thresholds for Deduction (Before Risk Weighting)			
72.	Investasi Non-Signifikan pada Modal atau Kewajiban TLAC Lainnya pada Entitas Keuangan Lain	**N/A**	Non-Significant Investments in the Capital and Other TLAC Liabilities of Other Financial Entities
73.	Investasi Signifikan pada Saham Biasa Entitas Keuangan	**N/A**	Significant Investments in the Common Stock of Financials
74.	*Mortgage Servicing Rights* (Net dari Kewajiban Pajak)	**N/A**	Mortgage Servicing Rights (Net of Related Tax Liability)
75.	Aset Pajak Tangguhan yang Berasal Dari Perbedaan Temporer (*Net* Dari Kewajiban Pajak)	**N/A**	Deferred Tax Assets Arising from Temporary Differences (Net of Related Tax Liability)
Cap Yang Dikenakan untuk Provisi pada *Tier* 2 / Applicable Caps on the Inclusion of Provisions in Tier 2			
76.	Provisi yang Dapat Diakui sebagai *Tier* 2 sesuai dengan Eksposur berdasarkan Pendekatan Standar (Sebelum Dikenakan *Cap*)	**N/A**	Provisions Eligible for Inclusion in Tier 2 in Respect of Exposures Subject to Standardised Approach (Prior to Application of Cap)
77.	*Cap* atas Provisi yang Diakui sebagai *Tier* 2 berdasarkan Pendekatan Standar	**N/A**	Cap on Inclusion of Provisions in Tier 2 under Standardised Approach
78.	Provisi yang Dapat Diakui sebagai *Tier* 2 sesuai dengan Eksposur berdasarkan Pendekatan IRB (Sebelum Dikenakan *Cap*)	**N/A**	Provisions Eligible for Inclusion in Tier 2 in Respect of Exposures Subject to IRB Approach (Prior to Application of Cap)
79.	*Cap* atas Provisi yang Diakui sebagai *Tier* 2 berdasarkan Pendekatan IRB	**N/A**	Cap for Inclusion of Provisions in Tier 2 under IRB Approach
Instrumen Modal yang Termasuk *Phase Out* (Hanya Berlaku antara 1 Januari 2018 s.d. 1 Januari 2022) / Capital Instruments Subject to Phase-Out Arrangements (Only Applicable between 1 January 2018 to 1 January 2022)			
80.	*Cap* pada CET 1 yang Temasuk *Phase Out*	**N/A**	Current Cap on CET 1 Instruments Subject to Phase Out Arrangements
81.	Jumlah yang Dikecualikan dari CET 1 Karena Adanya *Cap* (Kelebihan di Atas *Cap* Setelah *Redemptions dan Maturities*)	**N/A**	Amount Excluded from CET 1 Due to Cap (Excess Over Cap After Redemptions and Maturities)
82.	*Cap* pada AT 1 yang Temasuk *Phase Out*	**N/A**	Current Cap on AT 1 Instruments Subject to Phase Out Arrangements
83.	Jumlah yang Dikecualikan dari AT 1 Karena Adanya *Cap* (Kelebihan di Atas *Cap* Setelah *Redemptions dan Maturities*)	**N/A**	Amount Excluded from AT 1 Due to Cap (Excess Over Cap After Redemptions and Maturities)
84.	*Cap* pada *Tier* 2 yang Temasuk *Phase Out*	**N/A**	Current Cap on Tier 2 Instruments Subject to Phase Out Arrangements
85.	Jumlah yang Dikecualikan dari *Tier* 2 Karena Adanya *Cap* (Kelebihan di Atas *Cap* Setelah *Redemptions dan Maturities*)	**N/A**	Amount Excluded from Tier 2 Due to Cap (Excess Over Cap After Redemptions and Maturities)

Analisis Kualitatif
Qualitative Analysis

Capital Adequency Ratio (CAR) pada 31 Desember 2025 adalah sebesar 23,84% atau berada di atas ketentuan regulator yaitu paling rendah sebesar 8%.	The Capital Adequacy Ratio (CAR) as of 31 December 2025 was 23.84% or above the minimum regulatory requirement of 8%.

Tabel Rekonsiliasi Permodalan (CC 2) - Bank secara Individual
Table of Capital Reconciliation (CC 2) - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Pos-Pos	31 Desember 2024 31 December 2024	Items
ASET ASSETS			
1.	Kas	46,336	Cash
2.	Penempatan pada Bank Indonesia	1,238,091	Placements with Bank Indonesia
3.	Penempatan Pada Bank lain	1,722,376	Placements with Other Banks
4.	Tagihan Spot dan *Derivatif/Forward*	278	Spot and Derivative/Forward Receivables
5.	Surat Berharga yang Dimiliki	10,075,612	Securities
6.	Surat Berharga yang Dijual dengan Janji Dibeli Kembali (*Repo*)	-	Securities Sold under Repurchase Agreement (Repo)
7.	Tagihan atas Surat Berharga yang Dibeli dengan Janji Dijual Kembali (*Reverse Repo*)	-	Receivables from Securities Purchased under Resale Agreement (Reverse Repo)
8.	Tagihan Akseptasi	21,291	Acceptances Receivable
9.	Kredit yang Diberikan	22,380,166	Loans
10.	Pembiayaan Syariah	-	Sharia Financing
11.	Penyertaan Modal	-	Equity Participation
12.	Aset Keuangan Lainnya	325,114	Other Financial Assets
13.	Cadangan Kerugian Penurunan Nilai Aset Keuangan -/-	-	Allowance for Impairment Losses on Financial Assets -/-
	a. Surat Berharga yang Dimiliki	(1,153)	Securities
	b. Kredit yang Diberikan dan Pembiayaan Syariah	(558,646)	Loans and Sharia Financing
	c. Lainnya	(74)	Others
14.	Aset Tidak Berwujud	37,657	Intangible Assets
	Akumulasi Amortisasi Aset Tidak Berwujud -/-	(24,015)	Accumulated Amortisation of Intangible Assets -/-
15.	Aset Tetap dan Inventaris	486,379	Fixed Assets and Inventory
	Akumulasi Penyusutan Aktiva Tetap dan Inventaris -/-	(104,749)	Accumulated Depreciation of Fixed Assets and Inventory -/-
16.	Aset Non-Produktif	-	Non-Earning Assets
	a. Properti Terbengkalai	31,149	Abandoned Property
	b. Agunan yang Diambil Alih	295,723	Foreclosed Assets
	c. Rekening Tunda	1,649	Suspense Accounts
	d. Aset antarkantor	-	Inter-branch Assets
17.	Aset Lainnya	228,512.40	Other Assets
Total Aset		**36,201,697**	**Total Assets**

(dalam juta Rupiah / in million Rupiah)

No.	Pos-Pos	31 Desember 2024 31 December 2024	Items
LIABILITAS DAN EKUITAS / LIABILITIES AND EQUITY			
LIABILITAS / LIABILITIES			
1.	Giro	3,350,470	Demand Deposits
2.	Tabungan	3,775,826	Savings Deposits
3.	Deposito	17,168,401	Time Deposits
4.	Uang Elektronik	-	Electronic Money
5.	Liabilitas kepada Bank Indonesia	-	Liabilities to Bank Indonesia
6.	Liabilitas kepada Bank Lain	2,580,560	Liabilities to Other Banks
7.	Liabilitas Spot dan *Derivatif/Forward*	3,551	Spot and Derivative/Forward Liabilities
8.	Liabilitas atas Surat Berharga yang Dijual dengan Janji Dibeli Kembali (*Repo*)	693,569	Liabilities on Securities Sold under Repurchase Agreement (Repo)
9.	Liabilitas Akseptasi	21,291	Acceptances Payable
10.	Surat Berharga yang Diterbitkan	3,922,381	Securities Issued
11.	Pinjaman/Pembiayaan yang Diterima	-	Borrowings
12.	Setoran Jaminan	-	Guarantee Deposits
13.	Liabilitas Antarkantor	-	Inter-branch Liabilities
14.	Liabilitas Lainnya	316,725	Other Liabilities
15.	Kepentingan Minoritas (*Minority Interest*)	-	Minority Interest
Total Liabilitas		**31,832,776**	**Total Liabilities**
EKUITAS / EQUITY			
16.	Modal Disetor		Paid-In Capital
	a. Modal Dasar	4,100,000	a. Authorized Capital
	b. Modal yang Belum Disetor -/-	(2,258,058)	b. Unpaid Capital -/-
	c. Saham yang Dibeli Kembali (Treasury Stock) -/-	-	c. Treasury Stocks -/-
17.	Tambahan Modal Disetor	-	Additional Paid-In Capital
	a. Agio	667,789	a. Agio
	b. Disagio -/-	-	b. Disagio -/-
	c. Dana Setoran Modal	-	c. Capital Deposit Fund
	d. Lainnya	-	Others

(dalam juta Rupiah / in million Rupiah)

No.	Pos-Pos	31 Desember 2024 31 December 2024	Items
18.	Penghasilan Komprehensif Lain	-	Other Comprehensive Income
	a. Keuntungan	332,074	a. Gain
	b. Kerugian -/-	-	b. Loss -/-
19.	Cadangan	-	Reserve
	a. Cadangan Umum	252,200	a. General Reserves
	b. Cadangan Tujuan	-	b. Appropriated Reserves
20.	Laba/Rugi	-	Profit/Loss
	a. Tahun-Tahun Lalu	1,143,172	a. Previous Years
	b. Tahun Berjalan	131,745	b. For the Year
	c. Dividen yang Dibayarkan -/- Total Ekuitas yang dapat Diatribusikan kepada Pemilik	-	Dividend Paid -/- Total Equity Redeemable to Owners
Total Ekuitas		**4,368,921**	**Total Equity**
Total Liabilitas dan Ekuitas		**36,201,697**	**Total Liabilities and Equity**

Tabel Fitur Utama Instrumen Permodalan dan Instrumen TLAC - *Eligible* (CCA)
Table of Key Features of Capital Instrument and TLAC Instrument - Eligible (CCA)

No.	Pertanyaan Question	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information					
1.	**Penerbit** Issuer	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk	PT Bank Victoria International Tbk
2.	**Nomor Identifikasi** Unique Identifier	BVIC	BVIC03SBCN1	BVIC03SBCN2	BVIC02SBCN1	BVIC02SBCN2	BVIC02SBCN3
3.	**Hukum yang Digunakan** Governing Law(s) of the Instrument	Hukum Indonesia Indonesian Law	Hukum Indonesia Indonesian Law	Hukum Indonesia Indonesian Law	Hukum Indonesia Indonesian Law	Hukum Indonesia Indonesian Law	Hukum Indonesia Indonesian Law
4.	**Pada Saat Masa Transisi** Transitional Basel III Rules	N/A	N/A	N/A	N/A	N/A	N/A
5.	**Setelah Masa Transisi** Post-Transitional Basel III Rules	CET 1	*Tier* 2	*Tier* 2	*Tier* 2	*Tier* 2	*Tier* 2
6.	**Apakah Instrumen *Eligible* untuk Individu/Konsolidasi atau Konsolidasi dan Individu** Eligible at Individual/Group/Group and Individual	Individu Individual	Individu Individual	Individu Individual	Individu Individual	Individu Individual	Individu Individual
7.	**Jenis Instrumen** Instrument Type	Saham Biasa Common Stock	Obligasi Subordinasi Subordinated Bonds	Obligasi Subordinasi Subordinated Bonds	Obligasi Subordinasi Subordinated Bonds	Obligasi Subordinasi Subordinated Bonds	Obligasi Subordinasi Subordinated Bonds
8.	**Jumlah yang Diakui dalam Perhitungan KPMM** Amount Recognised in Regulatory Capital	895,195	500,000	-	250,000	150,000	60,000
9.	**Nilai par dari Instrumen** Par Value of Instrument	114	500,000	750,000	250,000	150,000	60,000
10.	**Klasifikasi sesuai Standar Akuntansi Keuangan** Classification based on Financial Accounting Standard	Ekuitas Equity	Liabilitas - Biaya Perolehan Amortisasi Liability - Amortised Cost	Liabilitas - Biaya Perolehan Amortisasi Liability - Amortised Cost	Liabilitas - Biaya Perolehan Amortisasi Liability - Amortised Cost	Liabilitas - Biaya Perolehan Amortisasi Liability - Amortised Cost	Liabilitas - Biaya Perolehan Amortisasi Liability - Amortised Cost
11.	**Tanggal Penerbitan** Original Date of Issuance	4 Juni 1999 4 June 1999	12 Juli 2024 12 July 2024	18 Juni 2025 18 June 2025	28 Juni 2019 28 June 2019	8 November 2019 8 November 2019	1 April 2020 1 April 2020
12.	**Tidak Ada Jatuh Tempo (*Perpetual*) atau dengan Jatuh Tempo** Perpetual or with Maturity	Perpetual	dengan Jatuh Tempo with Maturity	dengan Jatuh Tempo with Maturity	dengan Jatuh Tempo with Maturity	dengan Jatuh Tempo with Maturity	dengan Jatuh Tempo with Maturity
13.	**Tanggal Jatuh Tempo** Original Maturity Date	N/A	12 Juli 2029 12 July 2029	18 Juni 2030 18 June 2030	28 Juni 2026 28 June 2026	8 November 2026 8 November 2026	1 April 2027 1 April 2027

No.	Pertanyaan Question	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information					
14.	**Eksekusi *Call Option* atas Persetujuan Otoritas Jasa Keuangan** Execution of Call Option with Approval from Financial Services Authority	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
15.	**Tanggal *Call Option*, Jumlah Penarikan dan Persyaratan Call Option Lainnya (bila Ada)** Optional Call Date, Contingent Call Dates and Redemption Amount (if Any)	N/A	N/A	N/A	N/A	N/A	N/A
16.	***Subsequent Call Option***	N/A	N/A	N/A	N/A	N/A	N/A
	Kupon / Dividen Coupon / Dividend						
17.	**Dividen/Kupon dengan Bunga Tetap atau *Floating*** Fixed or Floating Coupon/Dividend	Dividen Dividend	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon	Kupon Coupon
18.	**Tingkat dari *Coupon Rate* atau Index Lain yang Menjadi Acuan** Coupon Rate And any Related Index	Floating	Fixed	Fixed	Fixed	Fixed	Fixed
19.	**Ada atau Tidaknya *Dividend Stopper*** Existence of a Dividend Stopper	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
20.	***Fully Discretionary; Partial* atau *Mandatory*** Fully Discretionary; Partial or Mandatory	Fully Discretionary	Partial Discreationary	Partial Discreationary	Partial Discreationary	Partial Discreationary	Partial Discreationary
21.	**Apakah Terdapat Fitur *Step Up* atau Insentif Lain** Existence of Step Up or Other Incentive to Redeem	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
22.	**Non-Kumulatif atau Kumulatif** Non-Cumulative or Cumulative	Non-Kumulatif Non-Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative	Kumulatif Cumulative
23.	**Dapat Dikonversi atau Tidak Dapat Dikonversi** Convertible or Non-Convertible	Tidak Dapat Dikonversi Non-Convertible	Tidak Dapat Dikonversi Non-Convertible	Tidak Dapat Dikonversi Non-Convertible	Tidak Dapat Dikonversi Non-Convertible	Tidak Dapat Dikonversi Non-Convertible	Tidak Dapat Dikonversi Non-Convertible
24.	**Jika Dapat Dikonversi, Sebutkan *Trigger Point*-Nya** If Convertible, Conversion Trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A

No.	Pertanyaan Question	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information					
25.	**Jika Dapat Dikonversi, Sebutkan *Trigger Point*-nya** If Convertible, Conversion Trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
26.	**Jika Dapat Dikonversi, Sebutkan *Trigger Point*-nya** If Convertible, Conversion Trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
27.	**Jika Dapat Dikonversi, Sebutkan *Trigger Point*-nya** If Convertible, Conversion Trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
28.	**Jika Dapat Dikonversi, Sebutkan *Trigger Point*-nya** If Convertible, Conversion Trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
29.	**Jika Dapat Dikonversi, Sebutkan *Trigger Point*-nya** If Convertible, Conversion Trigger (s)	N/A	N/A	N/A	N/A	N/A	N/A
30.	**Fitur *Write-Down*** Write-Down Feature	Tidak No	Ya Yes	Ya Yes	Ya Yes	Ya Yes	Ya Yes
31.	**Jika Terjadi *Write-Down*, Apakah Penuh atau Sebagian** If Write-Down, Full or Partial	N/A	**)	**)	**)	**)	**)
32.	**Jika terjadi *write-down*, apakah penuh atau sebagian** If write-down, full or partial	N/A	Bisa Penuh atau Sebagian Full or Partial	Bisa Penuh atau Sebagian Full or Partial	Bisa Penuh atau Sebagian Full or Partial	Bisa Penuh atau Sebagian Full or Partial	Bisa Penuh atau Sebagian Full or Partial
33.	**Jika Terjadi *Write Down*; Permanen atau Temporer** If Write-Down, Permanent or Temporary	N/A	N/A	N/A	N/A	N/A	N/A
34.	**Jika Terjadi *Write Down* Temporer, Jelaskan Mekanisme *Write-Up*** If Temporary Write-Down, Description of Write-Up Mechanism	N/A	N/A	N/A	N/A	N/A	N/A
35.	**Hierarki Instrumen pada Saat Likuidasi** Position In Subordination Hierarchy in Liquidation	*)	***)	***)	***)	***)	***)

No.	Pertanyaan Question	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information					
36.	**Apakah Terdapat Fitur yang *Non-Compliant*** Transition for Non-Compliant Feature	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No	Tidak No
37.	**Jika Ya, Jelaskan Fitur yang *Non-Compliant*** If Yes, Specify Non-Compliant Features	N/A	N/A	N/A	N/A	N/A	N/A

*) Pada saat likuidasi Pemegamg Saham hanya akan memperoleh pengembalian investasinya jika seluruh kreditur Bank telah memperoleh pembayaran dan masih terdapat sisa harta Bank.
**) Dalam hal Perseroan berpotensi terganggu usaha (*point of non-viability*), Perseroan akan menerapkan mekanisme *Write Down* sesuai dengan Pasal 19 Peraturan Otoritas Jasa Keuangan No. 11/2016 tanpa memerlukan persetujuan dari Pemegang Obligasi Subordinasi atau tanpa memerlukan keputusan RUPS.
***) Dalam hal terjadi Penutupan Usaha atau disolusi atau likuidasi Perseroan karena alasan lain apapun, pembagian harta kekayaan Emiten hasil Likuidasi untuk pembayaran Jumlah Terhutang oleh Perseroan kepada Pemegang Obligasi Subordinasi dilakukan sesuai urutan sebagaimana tersebut dalam Perjanjian Perwaliamanatan, dan hanya akan dibayarkan setelah dipenuhinya seluruh kewajiban pembayaran Perseroan kepada para Kreditur Preferen, Nasabah Penyimpan, dan para kreditur Hutang Senior, sesuai dengan peraturan perundang-undangan yang berlaku di Negara Republik Indonesia.

*) Upon liquidation, Shareholders shall only receive the remaining proceeds, if any, after all existing creditors have been paid and there is still the remaining assets of the Bank.
**) In the event that the Company's business is potentially disrupted (point of non-viability), the Company shall implement a Write Down mechanism in accordance with Article 19 of Financial Services Authority Regulations No. 11/2016 without requiring the approval of Subordinated Bondholders or without requiring a resolution of the GMS.
***) In the event of Business Closure or dissolution or liquidation of the Company for any other reason, the distribution of the Issuer's assets resulting from the Liquidation to pay the Amount Owed by the Company to Subordinated Bondholders shall be carried out in the order as stated in the Trustee Agreement and shall only be paid after the Company has fulfilled all payment obligations to Preferred Creditors, Depositors, and Senior Debt Creditors, in accordance with the laws and regulations applicable in the Republic of Indonesia.

Tabel Laporan Kewajiban Pemenuhan Rasio Pengungkit - Bank secara Individual
Table of Report on Obligation of Fulfillment of Leverage Ratio - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2024 31 December 2024	Description
1.	Total Aset di Neraca pada Laporan Keuangan Publikasi (Nilai *Gross* Sebelum Dikurangi CKPN)	36,748,896	Total Assets on the Balance Sheet in Published Financial Statements (Gross Value Before Deducting CKPN)
2.	Penyesuaian untuk Nilai Penyertaan pada Bank, Lembaga Keuangan, Perusahaan Asuransi, dan/atau Entitas Lain yang berdasarkan Standar Akuntansi Keuangan Harus Dikonsolidasikan namun Diluar Cakupan Konsolidasi berdasarkan Ketentuan Otoritas Jasa Keuangan	-	Adjustment for Investment in Bank, Financial Institution, Insurance Company, and/or Other Entities that Consolidated based on Accounting Standard Yet Out of Scope Consolidation based on the Financial Services Authority
3.	Penyesuaian untuk Nilai Kumpulan Aset Keuangan atau Aset Syariah yang Mendasari (*Underlying*) yang Telah Dialihkan dalam Sekuritisasi Aset yang Memenuhi Persyaratan Jual Putus sebagaimana Diatur dalam Peraturan Perundang-Undangan Otoritas Jasa Keuangan mengenai Prinsip Kehati-Hatian dalam Aktivitas Sekuritisasi Aset bagi Bank Umum	-	Adjustment for Portfolio of Financial Asset or Sharia Asset that Have Underlying which Already Transferred to without Recourse Securitization Asset as Stipulated in Financial Service Authority's Laws and Regulations related to Prudential Principles in Securitization Asset Activity for Commercial Bank
4.	Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (jika Ada)	N/A	Adjustment to Temporary Exception of Placements with Bank Indonesia in accordance Minimum Statutory Reserve (if Any)
5.	Penyesuaian untuk Aset Fidusia yang Diakui sebagai Komponen Neraca berdasarkan Standar Akuntansi Keuangan namun Dikeluarkan dari Perhitungan Total Eksposur dalam Rasio *Leverage*	N/A	Adjustment to Fiduciary Asset that Recognized as Balance Sheet based on Accounting Standard Yet Excluded from Total Exposure in Leverage Ratio Calculation
6.	Penyesuaian untuk Nilai Pembelian atau Penjualan Aset Keuangan Secara Regular dengan Menggunakan Metode Akuntansi Tanggal Perdagangan	-	Adjustment to Acquisition Cost or Sales Price of Financial Assets Regularly Using Trade Date Accounting Method
7.	Penyesuaian untuk Nilai Transaksi dalam Fasilitas *Cash Pooling* yang Memenuhi Persyaratan sebagaimana Diatur dalam Peraturan Otoritas Jasa Keuangan Ini	-	Adjustment to Qualified Cash Pooling Transaction as Stipulated in This Financial Services Authority's Regulation
8.	Penyesuaian untuk Nilai Eksposur Transaksi Derivatif	389	Adjustment to Exposure of Derivative Transaction
9.	Penyesuaian untuk Nilai Eksposur *Securitities Financing Transaction* (SFT) sebagai Contoh Transaksi *Reverse Repo*	-	Adjustment to Exposure of Securities Financing Transaction (SFT) as Example Reverse Repo Transaction
10.	Penyesuaian untuk Nilai Eksposur Transaksi Rekening Administratif (TRA) yang Telah Dikalikan dengan Faktor Konversi Kredit (FKK)	1,656,824	Adjustments to Exposure of Administrative Account Transaction (TRA) that Already Multiply with Credit Conversion Factor (FKK)
11.	*Prudent Valuation Adjustments* Berupa Faktor Pengurang Modal dan Cadangan Kerugian Penurunan Nilai (CKPN)	(618,400)	Prudent Valuation Adjustments in Form of Capital Deduction Factor and Allowance for Impairment Losses (CKPN)
12.	Penyesuaian Lainnya (jika Ada)	-	Other Adjustments (if Any)
13.	**Total Eksposur dalam Perhitungan Rasio *Leverage***	**37,787,709**	**Total Exposure in Leverage Ratio Calculation**

Tabel Laporan Perhitungan Rasio Pengungkit - Bank secara Individual
Table of Leverage Ratio Calculation Report - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2025 31 December 2025	Description
Eksposur Aset dalam Laporan Posisi Keuangan (Neraca) / On-Balance Sheet Exposure			
1.	Eksposur Aset dalam Laporan Posisi Keuangan (Neraca) Termasuk Aset Jaminan yang Tercatat dalam Neraca, Namun Tidak Termasuk Eksposur Transaksi Derivatif dan Eksposur SFT. (Nilai *Gross* Sebelum Dikurangi CKPN)	**36,034,015**	On-Balance Sheet Exposure Including Collateral Assets Recorded on the Balance Sheet, But Excluding Derivatives and Securities Financing Transaction (SFTs) (Gross Value Before Deducting Allowance for Impairment Losses)
2.	Nilai Penambahan Kembali untuk Agunan Derivatif yang Diserahkan kepada Pihak Lawan dan Penyediaan Agunan Tersebut Mengakibatkan Penurunan Total Eksposur Aset dalam Neraca Karena Adanya Penerapan Standar Akuntansi		The Revaluation of Derivative Collateral Provided to Counterparties and the Provision of Such Collateral Results in a Decrease in Total Asset Exposure on the Balance Sheet due to the Implementation of Accounting Standards
3.	(Pengurangan atas Piutang Terkait *Cash Variation Margin* yang Diberikan dalam Transaksi Derivatif)	-	(Deductions of Receivable Assets for Cash Variation Margin Provided in Derivatives Transactions)
4.	(Penyesuaian untuk Surat Berharga yang Diterima dalam Eksposur SFT yang Telah Dicatat sebagai Aset dalam Neraca Bank)	-	(Adjustment for Securities Received in SFT Exposures that have been Recorded as Assets on The Bank's Balance Sheet)
5.	(Cadangan Kerugian Penurunan Nilai (CKPN) atas Aset Tersebut sesuai Standar Akuntansi yang Berlaku)	**(518,541)**	(Allowance for Impairment Losses (CKPN) for these Assets in Accordance with Applicable Accounting Standards)
6.	(Aset yang Telah Diperhitungkan sebagai Faktor Pengurang Modal Inti (*Tier* 1) Sebagaimana Dimaksud dalam Peraturan Otoritas Jasa Keuangan yang Mengatur Mengenai Kewajiban Penyediaan Modal Minimum Bank Umum)	**(99,859)**	(Asset Amounts Deducted in Determining Basel III Tier 1 Capital and Regulatory Adjustments)
7.	**Total Eksposur Aset dalam Laporan Posisi Keuangan (Neraca) (Penjumlahan dari Baris 1 sampai dengan Baris 6)**	**35,415,615**	**Total On-Balance Sheet Exposure (Sum of Rows 1 to 6)**
Eksposur Transaksi Derivatif / Derivative Exposure			
8.	Nilai *Replacement Cost* (RC) untuk Seluruh Transaksi Derivatif Baik dalam Hal Terdapat *Variation Margin* yang Memenuhi Syarat ataupun terdapat Perjanjian Saling hapus yang Memenuhi Persyaratan Tertentu	**389**	Replacement Cost (RC) Associated with All Derivatives Transactions (Where Applicable Net of Eligible Cash Variation Margin and/or with Bilateral Netting)
9.	Nilai Penambahan yang Merupakan *Potential Futures Exposures* (PFE) untuk Seluruh Transaksi Derivatif	**278**	Add on Amounts for Potential Futures Exposures (PFE) Associated with All Derivatives Transactions
10.	(Pengecualian atas Eksposur Transaksi Derivatif yang Diselesaikan melalui *Central Clearing Counterparty* (CCP))	**N/A**	(Exempted Central Counterparty (CCP) Leg of Client-Cleared Trade Exposures)
11.	Penyesuaian untuk Nilai Nosional Efektif dari Derivatif Kredit		Adjusted Effective Notional Amount of Written Credit Derivatives
12.	(Penyesuaian untuk Nilai Nosional Efektif yang Dilakukan Saling Hapus dan Pengurangan *Add-On* untuk Transaksi Penjualan Kredit Derivatif)	-	(Adjusted Effective Notional Offsets and Add-On Deductions for Written Credit Derivatives)
13.	Total Eksposur Transaksi Derivatif (Penjumlahan Baris 8 Sampai dengan Baris 12)	**667**	Total Derivative Exposure (Sum of Rows 8 to 12)

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2025 31 December 2025	Description
Eksposur *Securities Financing Transaction* (SFT) / Securities Financing Transaction (SFT) Exposure			
14.	Nilai *Gross* SFT	**714,602**	Gross SFT Value
15.	(Nilai Bersih antara Liabilitas Kas dan Tagihan Kas)		(Netted Amounts of Cash Payables and Cash Receivables of Gross SFT assets)
16.	Risiko Kredit Akibat Kegagalan Pihak Lawan terkait Aset SFT yang Mengacu Perhitungan *Current Exposure* sebagaimana diatur dalam Lampiran I Peraturan Otoritas Jasa Keuangan ini	**-**	Credit Risk Due to Counterparty Defaults on SFT Assets Referring to the Current Exposure Calculation as stipulated in Attachment I of this Financial Services Authority Regulation
17.	Eksposur sebagai Agen SFT		Agent Transaction Exposures
18.	**Total Eksposur SFT (Penjumlahan Baris 14 sampai dengan Baris 17)**	**714,602**	**Total SFT Exposure (Sum of rows 14 to 17)**
Eksposur Transaksi Rekening Administratif (TRA) / Administrative Account Transaction (TRA) Exposure			
19.	Nilai seluruh Kewajiban Komitmen atau Kewajiban Kontijensi. *Nilai *Gross* sebelum Dikurangi CKPN	**7,013,282**	The total value of committed or contingent liabilities. *Gross Value Before Deducting Allowance for Impairment Losses
20.	(Penyesuaian terhadap Hasil Perkalian antara Nilai Kewajiban Komitmen atau Kewajiban Kontijensi dan Faktor Konversi Kredit (FKK))	**(5,356,457)**	(Adjustment from the Result of Multiplying Commitment Payable or Contingent Payables with Credit Conversion Factor (FKK))
21.	(Cadangan Kerugian Penurunan Nilai (CKPN) atas TRA tersebut sesuai Standar Akuntansi yang Berlaku).	**-**	(Allowance for Impairment Losses (CKPN) for Administrative Account Transaction is in Line with Applicable Accounting Standards)
22.	**Total Eksposur Transaksi Rekening Administratif (TRA) (Penjumlahan dari Baris 19 sampai dengan Baris 21)**	**1,656,825**	**Total Other Administrative Account Transaction (TRA) Exposure (Sum of rows 19 to 21)**
Modal dan Total Ekposur / Capital and Total Exposure			
23.	**Modal Inti (*Tier* 1)**	**4,060,507**	**Tier 1 Capital**
24.	**Total Eksposur (Penjumlahan Baris 7, 13, 18, dan 22)**	**37,787,709**	**Total Exposure (Sum of rows 7, 13, 18, and 22)**
Rasio *Leverage* / Leverage Ratio			
25.	Nilai Rasio *Leverage* (Kolom 23 ÷ Kolom 24)	**10,75**	Leverage Ratio Value (Column 23 ÷ Column 24)
26.	**Nilai Minimum Rasio *Leverage***	**3**	**National Minimum Leverage Ratio Requirement**
27.	***Buffer* terhadap nilai Rasio *Leverage***	**N/A**	**Applicable Leverage Buffer**
Pengungkapan Nilai Rata-Rata / Disclosures of Mean Values			
28.	Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara *Gross*, Setelah Penyesuaian untuk Transaksi Akuntansi Penjualan (*Sale Accounting Transaction*) yang Dihitung secara Bersih (*Nett*) dengan Liabilitas Kas dalam SFT dan Tagihan Kas dalam SFT	**21.033**	Mean Value of Gross SFT Assets, After Adjustment for Sale Accounting Transactions and Netted of Amounts of Associated Cash Payables and Cash Receivables
29.	Nilai Akhir Triwulan Laporan dari Nilai Tercatat Aset SFT secara *Gross*, Setelah Penyesuaian untuk Transaksi Akuntansi Penjualan (*Sale Accounting Transaction*) yang Dihitung Secara Bersih (*Nett*) dengan Liabilitas Kas dalam SFT dan Tagihan Kas dalam SFT	**21.033**	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2025 31 December 2025	Description
30.	Total Eksposur, Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang Telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara *Gross* Sebagaimana Dimaksud dalam Baris 28	**36,625,469**	Total exposures (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets
30a.	Total Eksposur, Tidak Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang Telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara *Gross* Sebagaimana Dimaksud dalam Baris 28	**37,787,709**	Total exposures (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT asset
31.	Nilai Rasio Pengungkit, Termasuk Dampak dari Penyesuaian terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang Telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara *Gross* Sebagaimana Dimaksud dalam Baris 28	**11.09**	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets
31a.	Nilai Rasio Pengungkit, Tidak Termasuk Dampak dari Penyesuaian Terhadap Pengecualian Sementara atas Penempatan Giro pada Bank Indonesia dalam Rangka Memenuhi Ketentuan Giro Wajib Minimum (Jika Ada), yang Telah Memasukkan Nilai Rata-Rata dari Nilai Tercatat Aset SFT secara *Gross* Sebagaimana Dimaksud dalam Baris 28	**10.75**	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets

Analisis Kualitatif Qualitative Analysis	
Rasio pengungkit pada 31 Desember 2025 adalah sebesar 10,75% atau berada diatas ketentuan Otoritas Jasa Keuangan yaitu paling rendah sebesar 3% sebagaimana yang diwajibkan di Peraturan Otoritas Jasa Keuangan No. 31/POJK.03./2019.	The Leverage Ratio as of 31 December 2025 was 10.75%, exceeding the minimum requirement of 3% set by Financial Services Authority as stipulated in Financial Services Authority Regulations No. 31/POJK.03./2019.

Pengungkapan Kualitas Kredit atas Aset (CR 1)
Disclosure of Credit Quality over Asset (CR 1)

1) Bank secara Individu / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No	Deskripsi	Nilai Tercatat Bruto Gross Carrying Amount		CKPN	CKPN		CKPN (Pendekatan IRB) CKPN (IRB Approach)	Nilai Bersih (a+b-c) Net Value (a+b-c)	Description
		Tagihan yang Telah Jatuh Tempo Due Receivables	Tagihan yang Belum Jatuh Tempo Not Due Receivables		*Stage 2* dan *Stage 3* Stage 2 and Stage 3	*Stage 1*			
		a	b	c	d	e	f	g	
1	Kredit	517,591	22,084,988	558,646	471,685	86,962		22,043,932	Credit
2	Surat Berharga	-	10,075,612	1,153	-	1,153		10,074,458	Marketable Securities
3	Transaksi Rekening Administratif	-	190,649	-	-	-		190,649	Administrative Account Transaction
4	**Total**	**517,591**	**32,351,248**	**559,800**	**471,685**	**88,115**		**32,309,040**	**Total**

2) Pengungkapan Tambahan / Additional Disclosure

1. Tagihan yang Telah Jatuh Tempo merupakan seluruh tagihan yang telah jatuh tempo lebih dari 90 hari, baik atas pembayaran pokok dan/atau pembayaran bunga, atau tagihan kepada debitur wanprestasi
2. Bank tidak memiliki eksposur kualitas kredit atas aset secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

1. Matured Receivable is all bill that has been overdue more than 90 days, either on the payments of principal and/or interest; or bills to defaulting debtors.
2. The Bank does not have credit quality exposure on assets on a consolidated basis pursuant to Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk. and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Mutasi Kredit dan Surat Berharga yang Telah Jatuh Tempo (CR 2)
Disclosure of Changes in Due Loans and Securities (CR 2)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	2025	Description
1.	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada Periode Pelaporan Terakhir	**500,548**	Due loans and securities on Last Reporting Period
2.	Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak Periode Pelaporan Terakhir	**42,415**	Due Loans and Securities since Last Reporting Period
3.	Kredit dan Surat Berharga yang Kembali Menjadi Tagihan yang Belum Jatuh Tempo	**3,402**	Not Due Loans and Securities that Return to Receivables
4.	Nilai Hapus Buku	**5,000**	Write-off Value
5.	Perubahan Lain	**(16,970)**	Other Changes
6.	**Kredit dan Surat Berharga yang Telah Jatuh Tempo pada Akhir Periode Pelaporan (1+2-3-4+5)**	**517,591**	**Due Loans and Securities on Last Reporting Period (1+2-3-4+5)**

2) Pengungkapan Tambahan / Additional Disclosure

Bank tidak memiliki eksposur mutasi kredit dan surat berharga yang telah jatuh tempo secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk. dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi entitas anak PT Bank Victoria International Tbk

The Bank does not have exposure to changes in due loans and securities on a consolidated basis pursuant to Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk. and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a subsidiary of PT Bank Victoria International Tbk

Tabel Pengungkapan Tagihan Bersih berdasarkan Wilayah
Table of Disclosure of Net Receivables by Area

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2025 31 December 2025 Tagihan Bersih berdasarkan Wilayah Net Receivables by Region					Portfolio Category
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
1.	Tagihan kepada Pemerintah	**8,392,649**	**-**	**-**	**-**	**8,392,649**	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	**1,327,766**	**-**	**-**	**-**	**1,327,766**	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	**14,731**	**-**	**-**	**-**	**14,731**	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	**2,416,859**	**4,252**	**-**	**212,078**	**2,633,189**	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	**-**				**-**	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	**3,902,674**	**-**	**-**	**-**	**3,902,674**	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	**-**	**-**	**-**	**-**	**-**	Receivables in the form of Subordinated Securities/Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	**161,111**	**245**	**-**	**-**	**161,356**	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	**4,005,911**	**129,258**	**-**	**-**	**4,135,169**	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	**-**				**-**	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	**-**	**-**	**-**	**-**	**-**	Employee/Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	**2,568,561**	**78,236**	**11,262**	**-**	**2,658,059**	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	**12,405,086**	**887,277**	**75,664**	**-**	**13,368,028**	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	**297,358**	**54,565**	**-**	**-**	**351,923**	Due Receivables
15.	Aset Lainnya	**891,904**	**-**	**-**	**-**	**891,904**	Other Assets
	Total	**36,384,609**	**1,153,833**	**86,926**	**212,078**	**37,837,446**	**Total**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 31 December 2024 Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region					Portfolio Category
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	
1.	Tagihan kepada Pemerintah	7,295,086	-	-	-	**7,295,086**	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	1,150,922	-	-	-	**1,150,922**	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	2,523	-	-	-	**2,523**	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	256,994	4,374	-	37,884	**299,252**	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-				**-**	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	3,719,629	-	-	-	**3,719,629**	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	219,934	-	-	-	**219,934**	Receivables in the form of Subordinated Securities/Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	148,951	1,607	-	-	**150,558**	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	3,459,718	44,986	-	-	**3,504,704**	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-				**-**	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	**-**	Employee/Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,570,289	171,326	10,983	-	**2,752,599**	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	10,863,608	1,054,741	76,589	-	**11,994,937**	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	321,962	123,189	-	-	**445,151**	Due Receivables
15.	Aset Lainnya	1,043,860	-	-	-	**1,043,860**	Other Assets
	Total	**31,053,477**	**1,400,222**	**87,572**	**37,884**	**32,579,154**	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

Based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a Subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Tagihan Bersih berdasarkan Sektor Ekonomi
Disclosure of Net Receivables by Economic Sector

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
31 Desember 2025 31 December 2025																
1.	Pertanian, Kehutanan, dan Perikanan Agriculture, Forestry, and Fisheries	-	-	-	-			-	-	-		-	116,830	412,917	-	-
2.	Pertambangan dan Penggalian Mining and Extractive Industries	-	-	5,208	-			-	-	-		-	41,756	1,531,826	-	-
3.	Industri pengolahan Processing Industry	-	-	-	-			-	-	-		-	432,300	3,526,709	24,281	-
4.	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/ Hot Water, and Cold Air	-	-	2,523	-			-	-	-		-	57,118	62,895	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah Water Management, Waste Water Management, Waste Management and Recycle	-	-	-	-			-	-	-		-	25,695	-	-	-
6.	Konstruksi Construction	-	-	-	-			-	-	1,162,780		-	-	43,784	11,205	-
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	-	-	-	-			-	-	-		-	1,153,297	3,014,378	36,861	-
8.	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-			-	-	-		-	242,933	815,653	-	-
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum Provision of Accomodation and Foods & Beverages	-	-	-	-			-	-	33,467		-	114,692	466,797	30,920	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
10.	Informasi dan Komunikasi Information and Communication	-	-	-	-			-	-	-		-	87,364	153,092	-	-
11.	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	8,392,649	1,325,703	-	2.,633,189		3,902,674	-	-	-		-	156,329	2,210,811	-	-
12.	*Real Estate* Real Estate	-	2,063	-	-			-	-	2,930,823		-	-	302	238,005	-
13.	Aktivitas Profesi, Ilmiah, dan Teknis Professional, Scientific, and Technical Activities	-	-	7,000	-			-	-	8,099		-	46,880	343,595	-	-
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	-	-	-			-	-	-		-	117,060	368,838	6,881	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib Government Administration, Land Business and Mandatory Social Service	-	-	-	-			-	-	-		-	-	-	-	-
16.	Pendidikan Education	-	-	-	-			-	-	-		-	15,922	79,993	-	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health Activities and Social Activities	-	-	-	-			-	-	-		-	25,761	156,352	-	-
18.	Kesenian, Hiburan, dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-			-	-	-		-	21,791	107,951	-	-
19.	Aktivitas Jasa Lainnya Other Services Activities	-	-	-	-			-	-	-		-	-	-	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International Organizations and Other Extra International Organizations Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22.	Bukan Lapangan Usaha Non-Business	-	-	-	-	-		-		-	-	-	-	-		
23.	Rumah Tangga Household	-	-	-	-	-		-	161,356	-	-	-	2,231	72,134	3,771	-
24.	Lainnya Others	-	-	-	-	-		-	-	-	-	-	-	-	-	891,904
	Total	**8,392,649**	**1,327,766**	**14,731**	**2,633,189**	**-**	**3,902,674**	**-**	**161,356**	**4,135,169**	**-**	**-**	**2,658,059**	**13,368,028**	**351,923**	**891,904**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
31 Desember 2024 31 December 2024																
1.	Pertanian, Kehutanan, dan Perikanan Agriculture, Forestry, and Fisheries	-	-	-	-	-	-	-	-	-	-	-	147,427	396,235	2,517	-
2.	Pertambangan dan Penggalian Mining and Extractive Industries	-	-	-	-	-	-	-	-	-	-	-	136,843	863,176	-	-
3.	Industri pengolahan Processing Industry	-	-	-	-	-	-	-	-	-	-	-	414,323	2,761,689	21,033	-
4.	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/ Hot Water, and Cold Air	-	-	-	-	-	-	-	-	-	-	-	62,809	33,830	-	-
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah Water Management, Waste Water Management, Waste Management and Recycle	-	-	-	-	-	-	-	-	-	-	-	29,955	875	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
6.	Konstruksi Construction	-	-	-	-	-	-	-	-	1,138,433	-	-	-	56,353	4,545	-
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	-	-	-	-	-	-	-	-	-	-	-	1,148,414	2,605,047	24,738	-
8.	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-	-	-	-	-	-	-	-	238,787	380,998	-	-
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum Provision of Accomodation and Foods & Beverages	-	-	-	-	-	-	-	-	43,703	-	-	89,668	566,245	96,989	-
10.	Informasi dan Komunikasi Information and Communication	-	-	-	-	-	-	-	-	-	-	-	72,665	208.776	34,415	-
11.	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	7,295,086	1,137,374	2,523	299,252	-	3,719,629	219,934	-	-	-	-	230,934	2,828,407	-	-
12.	*Real Estate* Real Estate	-	8,542	-	-	-	-	-	-	2,313,776	-	-	-	-	250,675	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
13.	Aktivitas Profesi, Ilmiah, dan Teknis Professional, Scientific, and Technical Activities	-	-	-	-	-	-	-	-	8,792	-	-	34,550	496,295	556	-
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya Leasing and Leasing Activities without Option Rights, Employment, Travel Agencies, and Other Business Supports	-	5,006	-	-	-	-	-	-	-	-	-	75,890	505,031	935	-
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib Government Administration, Land Business and Mandatory Social Service	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16.	Pendidikan Education	-	-	-	-	-	-	-	-	-	-	-	32,630	80,513	1,488	-
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health Activities and Social Activities	-	-	-	-	-	-	-	-	-	-	-	5,551	114,715	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
18.	Kesenian, Hiburan, dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-	-	-	-	-	-	-	-	32,053	24,987	-	-
19.	Aktivitas Jasa Lainnya Other Services Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs	-	-	-	-	-	-	-	-	-	-	-	100	-	-	-
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International Organizations and Other Extra International Organizations Activities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi Economic Sector	Tagihan kepada Pemerintah Receivables from Government	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	Tagihan kepada Bank Receivables from Banks	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity and Other Capital Instruments	Kredit Beragunan Rumah Tinggal Residential Property Collateralized Loans	Kredit Beragunan Properti Komersial Commercial Property Collateralized Loans	Kredit untuk Pengadaan Tanah, Pengelolaan Tanah, dan Konstruksi Loan by Land Acquisition, Land Processing, and Construction	Kredit Pegawai/ Pensiun Employee/ Retirement Loans	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	Tagihan kepada Korporasi Receivables from Corporations	Tagihan yang Telah Jatuh Tempo Due Receivables	Aset Lainnya Other Assets
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
22.	Bukan Lapangan Usaha Non-Business	-	-	-	-	-	-	-	150,558	-	-	-	-	71,765	7,258	-
23.	Rumah Tangga Household	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24.	Lainnya Others	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,043,860
	Total	**7,295,086**	**1,150,922**	**2,523**	**299,252**	**-**	**3,719,629**	**219,934**	**150,558**	**3,504,704**	**-**	**-**	**2,752,599**	**11,994,937**	**445,151**	**1,043,860**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

Based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a Subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak - Bank secara Individual
Disclosure of Net Receivables by Remaining Contract Period - Bank Individually

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2025 31 December 2025						Portfolio Category
		Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak Net Receivables by Remaining Contract Period						
		≤1 Tahun ≤1 Year	>1 Tahun s.d. 3 Tahun >1 to 3 Years	>3 Tahun s.d. 5 Tahun >3 to 5 Years	>5 Tahun >5 Years	Non-Kontraktual Non-Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Tagihan kepada Pemerintah	2,639,332	480,810	403,340	4,869,167	-	8,392,649	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	1,068,278	120,782	138,706	-	-	1,327,766	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	12,208	2,523	-	-	-	14,731	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	2,633,189	-	-	-	-	2,633,189	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	-	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	2,002,961	1,104,356	794,659	-	697	3,902,674	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	1,676	23,532	21,419	114,729	-	161,356	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	1,662,057	378,350	604,456	1,490,306	-	4,135,169	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	-	Employee/Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,073,261	208,906	211,871	164,020	-	2,658,059	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	6,780,281	2,160,088	2,554,094	1,871,565	2,000	13,368,028	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	293,935	3,116	45,070	9,802	-	351,923	Due Receivables
15.	Aset Lainnya	-	-	-	-	891,904	891,904	Other Assets
	Total	19,167,178	4,482,462	4,773,615	8,519,589	894,601	37,837,446	**Total**

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 / 31 December 2024						Portfolio Category
		Tagihan Bersih berdasarkan Sisa Jangka Waktu Kontrak / Net Receivables by Remaining Contract Period						
		≤1 Tahun / ≤1 Year	>1 Tahun s.d. 3 Tahun / >1 to 3 Years	>3 Tahun s.d. 5 Tahun / >3 to 5 Years	>5 Tahun / >5 Years	Non-Kontraktual / Non-Contractual	Total	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(2)
1.	Tagihan kepada Pemerintah	3,154,726	1,542,009	315,059	2,283,291	-	**7,295,086**	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	1,142,380	8,542	-	-	-	**1,150,922**	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	2,523	-	-	-	**2,523**	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	299,219	33	-	-	-	**299,252**	Receivables from Banks
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	**-**	Receivables in the form of Covered Bond
6.	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	2,248,119	899,917	571,593	-	-	**3,719,629**	Receivables from Securities Companies and Other Financial Services Institutions
7.	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	219,934	-	-	-	-	**219,934**	Receivables in the form of Subordinated Securities/Receivables, Equity, and Other Capital Instruments
8.	Kredit Beragunan Rumah Tinggal	2,355	10,652	27,397	110,154	-	**150,558**	Residential Property Collateralized Loans
9.	Kredit Beragunan Properti Komersial	1,624,722	214,350	599,858	1,065,774	-	**3,504,704**	Commercial Property Collateralized Loans
10.	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	**-**	Loan by Land Acquisition, Land Processing, and Construction
11.	Kredit Pegawai/Pensiunan	-	-	-	-	-	**-**	Employee/Retirement Loans
12.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,154,910	171,159	324,368	102,161	-	**2,752,599**	Receivables from Microbusiness, Small Business, and Retail Portfolio
13.	Tagihan kepada Korporasi	5,855,800	2,027,808	2,392,184	1,715,191	3,954	**11,994,937**	Receivables from Corporations
14.	Tagihan yang Telah Jatuh Tempo	73,690	231,614	10,086	129,761	-	**445,151**	Due Receivables
15.	Aset Lainnya	-	-	-	-	1,043,860	**1,043,860**	Other Assets
	Total	**16,775,856**	**5,108,607**	**4,240,546**	**5,406,332**	**1,047,814**	**32,579,154**	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

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Pengungkapan Tagihan dan Pencadangan berdasarkan Wilayah
Disclosure of Receivables and Allowances by Area

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan	31 Desember 2025 31 December 2025					31 Desember 2024 31 December 2024					Description
		Wilayah Region					Wilayah Region					
		Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	Zona Indonesia Barat (Wilayah 1) Indonesia Zone West (Zone 1)	Zona Indonesia Tengah (Wilayah 2) Indonesia Zone Center (Zone 2)	Zona Indonesia Timur (Wilayah 3) Indonesia Zone East (Zone 3)	Di Luar Indonesia (Wilayah 4) Outside Indonesia (Zone 4)	Total	
(1)	(2)	(4)	(5)	(6)	(7)	(8)	(3)	(4)	(5)	(6)	(7)	(2)
1.	Tagihan	**35,057,164**	**1,301,606**	**83,720**	**212,078**	**36,654,568**	29,434,987	1,418,073	86,791	37,884	**30,977,735**	Receivables
2.	Tagihan yang Mengalami Peningkatan dan Pemburukan Risiko Kredit (*Stage* 2 dan *Stage* 3)											Claims with Increased and Worsening Credit Risk (Stage 2 and Stage 3)
	a. Belum Jatuh Tempo	**827,460**	**264,313**	**-**	**-**	**1,091,773**	733,392	142,939	-	-	**876,331**	a. Not Due
	b. Telah Jatuh Tempo	**376,945**	**140,645**	**-**	**-**	**517,591**	463,443	152,590	-	-	**616,032**	b. Due
3.	CKPN - *Stage* 1	**83,654**	**3,013**	**294**	**-**	**86,962**	73,401	4,436	223	-	**78,060**	CKPN - Stage 1
4.	CKPN - *Stage* 2	**198,133**	**107,884**	**-**	**-**	**306,017**	133,231	55,214	-	-	**188,446**	CKPN - Stage 2
5.	CKPN - *Stage* 3	**79,588**	**86,080**	**-**	**-**	**165,668**	143,701	36,758	-	-	**180,460**	CKPN - Stage 3
6.	Tagihan yang Dihapus Buku	**(146,976)**	**(38,844)**	**-**	**-**	**(185,820)**	(255,035)	(38,830)	-	-	**(293,865)**	Receivables Written Off

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi Atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

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Pengungkapan Tagihan dan Pencadangan berdasarkan Sektor Ekonomi
Disclosure of Receivables and Allowances by Economic Sector

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 1* Losses Allowance (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 2* Losses Allowance (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 3* Allowance (CKPN) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
31 Desember 2025 31 December 2025									
1.	Pertanian, Kehutanan, dan Perikanan	497,422	-	-	3,756	-	-	(7,372)	Agriculture, Forestry, and Fisheries
2.	Pertambangan dan Penggalian	1,501,393	7,218	-	3,314	385	-	-	Mining and Extractive Industries
3.	Industri Pengolahan	3,862,864	104,026	32,769	12,463	58,606	8,489	(36,471)	Processing Industry
4.	Pengadaan Listrik, Gas, Uap/ Air Panas, dan Udara Dingin	120,129	29,455	-	339	4,091	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	25,652	1,546	-	22	82	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6.	Konstruksi	1,123,039	122,441	17,314	2,012	17,657	6,109	-	Construction
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	3,983,118	178,781	72,719	10,858	54,923	35,859	(4,210)	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8.	Pengangkutan dan Pergudangan	991,636	41,311	-	3,.804	4,195	-	-	Transportation and Warehousing
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum	765,114	260,668	102,551	3,735	74,056	71,631	-	Provision of Accomodation and Foods & Beverages
10.	Informasi dan Komunikasi	229,214	12,260	-	478	662	-	(114,852)	Information and Communication
11.	Aktivitas Keuangan dan Asuransi	16,811,716	-	-	20,952	-	-	-	Financial and Insurance Activities
12.	*Real Estate*	4,374,847	256,170	272,175	20,089	74,831	34,170	(8,827)	Real Estate

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 1* Losses Allowance (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 2* Losses Allowance (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 3* Allowance (CKPN) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
13.	Aktivitas Profesi, Ilmiah, dan Teknis	370,424	6,159	-	1,060	327	-	(5,750)	Professional, Scientific, and Technical Activities
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	461,536	14,606	10,572	1,513	1,666	3,691	-	Leasing and Leasing Activities Without Option Rights, Employment, Travel Agencies, and Other Business Supports
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	-	-	-	-	-	-	-	Government Administration, Land Business, and Mandatory Social Service
16.	Pendidikan	86,312	16,593	-	245	3,179	-	(2,005)	Education
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	172,080	-	-	660	-	-	-	Human Health Activities and Social Activities
18.	Kesenian, Hiburan, dan Rekreasi	136,907	28,956	-	388	7,307	-	-	Arts, Entertainment, and Recreation
19.	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	Other Services Activities
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri	-	-	-	-	-	-	-	Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22.	Bukan Lapangan Usaha	-	-	-				-	Household
23.	Rumah Tangga	249,261	11,584	9,490	1,273	4,050	5,720	(6,333)	Non-Business
24.	Lainnya	891,904	-	-	-	-	-	-	Others
	Total	36,654,568	1,091,773	517,591	86,962	306,017	165,668	(185,820)	**Total**

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 1* Losses Allowance (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 2* Losses Allowance (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 3* Allowance (CKPN) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
31 Desember 2024 31 December 2024									
1.	Pertanian, Kehutanan, dan Perikanan	526,922	-	10,541	1,407	-	8,024	-	Agriculture, Forestry, and Fisheries
2.	Pertambangan dan Penggalian	944,621	-	-	2,691	-	-	-	Mining and Extractive Industries
3.	Industri Pengolahan	3,056,929	146,959	30,934	7,972	53,492	19,480	-	Processing Industry
4.	Pengadaan Listrik, Gas, Uap/ Air Panas, dan Udara Dingin	98,181	31,437	-	231	3,919	-	-	Procurement of Electricity, Gas, Steam/Hot Water, and Cold Air
5.	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah	26,224	-	-	37	-	-	-	Water Management, Waste Water Management, Waste Management and Recycle
6.	Konstruksi	1,113,764	137,550	6,126	1,748	15,469	1,581	-	Construction
7.	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor	3,506,771	125,687	44,084	11,033	32,887	19,345	(96,333)	Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance
8.	Pengangkutan dan Pergudangan	597,663	39,952	-	1,787	3,789	-	(134,001)	Transportation and Warehousing
9.	Penyediaan Akomodasi dan Penyediaan Makan Minum	770,731	28,626	109,873	3,895	8,950	12,884	(38,830)	Provision of Accomodation and Foods & Beverages
10.	Informasi dan Komunikasi	381,556	12,294	114,852	672	744	80,437	-	Information and Communication
11.	Aktivitas Keuangan dan Asuransi	13,329,775	-	-	18,925	-	-	-	Financial and Insurance Activities
12.	*Real Estate*	3,962,750	286,421	276,309	21,709	60,554	25,634	(24,700)	Real Estate

(dalam juta Rupiah / in million Rupiah)

No.	Sektor Ekonomi	Tagihan Receivables	Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 1* Losses Allowance (CKPN) - Stage 1	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 2* Losses Allowance (CKPN) - Stage 2	Cadangan Kerugian Penurunan Nilai (CKPN) - *Stage 3* Allowance (CKPN) - Stage 3	Tagihan yang Dihapus Buku Receivables Written Off	Economic Sector
			Belum Jatuh Tempo Not Due	Telah Jatuh Tempo Due					
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(2)
13.	Aktivitas Profesi, Ilmiah, dan Teknis	538,439	10,115	5,750	1,415	1,105	5,194	-	Professional, Scientific, and Technical Activities
14.	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan, dan Penunjang Usaha Lainnya	549,822	19,454	1,262	1,429	1,613	327	-	Leasing and Leasing Activities Without Option Rights, Employment, Travel Agencies, and Other Business Supports
15.	Administrasi Pemerintahan, Pertahanan, dan Jaminan Sosial Wajib	-	-	-	-	-	-	-	Government Administration, Land Business, and Mandatory Social Service
16.	Pendidikan	115,126	24,384	2,005	258	2,856	518	-	Education
17.	Aktivitas Kesehatan Manusia dan Aktivitas Sosial	118,087	-	-	386	-	-	-	Human Health Activities and Social Activities
18.	Kesenian, Hiburan, dan Rekreasi	56,826	-	-	220	-	-	-	Arts, Entertainment, and Recreation
19.	Aktivitas Jasa Lainnya	-	-	-	-	-	-	-	Other Services Activities
20.	Aktivitas Rumah Tangga sebagai Pemberi Kerja; Aktivitas yang Menghasilkan Barang dan Jasa oleh Rumah Tangga yang Digunakan untuk Memenuhi Kebutuhan Sendiri	-	-	-	0	-	-	-	Household Activities as an Employer; Activities that Produce Goods and Services by Households that are Used to Meet Their Own Needs
21.	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya	-	-	-	-	-	-	-	International Organizations and Other Extra International Organizations Activities
22.	Bukan Lapangan Usaha	-	-	-	-	-	-	-	Household
23.	Rumah Tangga	239,687	13,454	14,295	2,245	3,068	7,037	-	Non-Business
24.	Lainnya	1,043,860	-	-	-	-	-	-	Others
	Total	**30,977,735**	**876,331**	**616,032**	**78,060**	**188,446**	**180,460**	**(293,865)**	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

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Pengungkapan Tagihan berdasarkan Hari Tunggakan
Disclosure of Receivables by Due Date

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Jenis Eksposur	31 Desember 2025 31 December 2025				31 Desember 2024 31 December 2024				Exposure Type
		Tagihan berdasarkan Hari Tunggakan Receivables by Due Date				Tagihan berdasarkan Hari Tunggakan Receivables by Due Date				
		>90 Hari s.d. 120 Hari >90 Days to 120 Days	>120 Hari s.d. 180 Hari >120 Days to 180 Days	>180 Hari >180 Days	Total	>90 Hari s.d. 120 Hari >90 Days to 120 Days	>120 Hari s.d. 180 Hari >120 Days to 180 Days	>180 Hari >180 Days	Total	
a	b	c	d	e	f	c	d	e	f	b
1.	Kredit yang Termasuk dalam Tagihan yang Telah Jatuh Tempo	**8,061**	**662**	**508,869**	**517,591**	5,000	5,103	605,929	616,032	Loan Included in Due Receivables
2.	Surat Berharga yang Termasuk dalam Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	Securities Included in Due Receivables
	Total	**8,061**	**662**	**508,869**	**517,591**	5,000	5,103	605,929	616,032	**Total**

*) Berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

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Pengungkapan Tambahan terkait Perlakuan terhadap Aset Bermasalah (CRB-A)
Additional Disclosures Regarding Treatment of Non-Performing Assets (CRB-A)

Pengungkapan Aset *Performing* dan *Non-Performing*
Disclosure of Performing and Non-Performing Assets

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	*Performing* (Kualitas L dan DPK) Performing (Quality of L and DPK)		*Non-Performing* (Kualitas KL, D, M) Non-Performing (Quality of KL,D, M)						Description
				Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Tagihan yang Tidak Mengalami Penurunan Nilai Non Impaired Receivables				
						Memiliki Tunggakan >90 Hari Have Arrears >90 Days		Memiliki Tunggakan ≤90 Hari Have Arrears ≤90 Days		
		Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	
		a	b	c	d	e	f	g	h	
1.	Surat Berharga	10,075,612	1,153	-	-	-	-	-	-	Marketable Securities
2.	Kredit	21,862,575	392,979	517,591	165,668	-	-	-	-	Credit
	a. Korporasi	21,623,990	387,655	508,100	159,948	-	-	-	-	a. Corporate
	b. Ritel	238,586	5,323	9,490	5,720	-	-	-	-	b. Retail
3.	Transaksi Rekening Administratif	6,821,603	-	5,655	-	-	-	-	-	Administrative Account Transaction

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Pengungkapan Aset Restrukturisasi *Performing* dan Non-*Performing*
Disclosure of Performing and Non-Performing Restructuring Assets

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	*Performing* (Kualitas L dan DPK) Performing (Quality of L and DPK)		Non-*Performing* (Kualitas KL, D, M) Non-Performing (Quality of KL,D, M)		Stage 1		Stage 2		Stage 3		Description
		Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	Nilai Tercatat Bruto Gross Carrying Amount	CKPN	
		a	b	c	d	e	f	g	h	i	j	
1.	Surat Berharga	-	-	-	-	-	-	-	-	-	-	Marketable Securities
2.	Kredit	1,453,017	315,063	421,516	122,167	1,560,738	335,190	201,679	29,508	107,573	68,051	Credit
	a. Korporasi	1,435,367	309,740	419,849	121,392	1,544,404	331,701	200,265	29,287	106,004	67,979	a. Corporate
	b. Ritel	17,650	5,323	1,667	775	16,334	3,489	1,414	222	1,569	71	b. Retail
3.	Transaksi Rekening Administratif	66,020	-	5,655	-	65,971	-	5,601	-	103	-	Administrative Account Transaction

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Pengungkapan Kuantitatif terkait Teknik MRK (CR3)
Disclosure of Quantitative related to MRK Techniques (CR3)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Deskripsi	Tagihan yang Tidak Dijamin dengan Teknik MRK Not Guaranteed Receivables Using MRK Techniques	Tagihan yang Dijamin dengan Teknik MRK Guaranteed Receivables Using MRK Techniques	Tagihan yang Dijamin dengan Agunan Guaranteed Receivables by Collateral	Tagihan yang Dijamin dengan Garansi, Penjaminan, dan/atau Asuransi Kredit Guaranteed Receivables by Guarantee, Security, and/or Credit Insurance	Tagihan yang Dijamin dengan Derivatif Kredit Receivables Secured by Credit Derivatives	Description
		a	b	c	d	e	
1.	Kredit	20,081,311	1,962,622	1,962,622	-		Credit
2.	Surat Berharga	10,074,458	-	-	-		Marketable Securities
3.	Total	30,155,769	1,962,622	1,962,622	-		Total
4.	Kredit dan Surat Berharga yang Telah Jatuh Tempo	517,591	-	-	-		Due Loans and Securities

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur kuantitatif terkait teknik MRK secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

   The Bank does not have quantitative exposure related to MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a Subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4)
Disclosure of Credit Risk Exposure and Impact of MRK Techniques (CR4)

1) Bank secara Individual / Bank Individually

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

No.	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e	f	
1.	Tagihan kepada Pemerintah	8,392,649	-	8,392,649	-	-	0%	Receivables from Government
2.	Tagihan kepada Entitas Sektor Publik	1,227,666	1,001,000	1,227,666	100,100	316,442	24%	Receivables from Public Sector Entities
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	14,731	-	14,731	7,366	50%	Receivables from Multilateral Development Banks and International Institutions
4.	Tagihan kepada Bank	2,631,779	3,526	2,631,779	1,410	529,927	20%	Receivables from Banks
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain[1)]	3,616,548	2,861,258	3,516,548	286,126	1,122,030	30%	Receivables from Securities Companies and Other Financial Services Institutions[1)]
5.	Tagihan berupa *Covered Bond*	-	-	-	-	-	0%	Receivables in the form of Covered Bond
6.	Tagihan kepada Korporasi - Eksposur Korporasi Umum[2)]	12,647,148	1,798,821	11,233,764	720,879	10,094,841	84%	Receivables from Corporations - General Corporate Exposure[2)]
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain[3)]	-	-	-	-	-	0%	Receivables from Securities Companies and Other Financial Services Institutions[3)]
	Eksposur Pembiayaan Khusus[4)]	-	-	-	-	-	0%	Special Financing Exposure[4)]
7.	Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-		-	0%	Receivables in the from Subordinated Securities/ Receivables, Equity, and Other Capital Instruments

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

No.	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e	f	
8.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	2,344,958	782,751	1,895,720	313,100	1,877,498	85%	Receivables from Microbusiness, Small Business, and Retail Portfolio
9.	Kredit Beragun Properti						0%	Property Collateralized Loans
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung secara Material pada Arus Kas Properti	161,356	-	161,356	-	69,672	43%	Residential Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung secara Material pada Arus Kas Properti	-	-	-	-	-	0%	Residential Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung secara Material pada Arus Kas Properti	-	-	-	-	-	0%	Commercial Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung secara Material pada Arus Kas Properti	3,916,952	545,541	3,916,952	218,216	3,939,430	95%	Commercial Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow
10.	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	0%	Land Acquisition, Land Processing, and Construction Loans

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

No.	Kategori Portofolio	Tagihan Bersih Sebelum Penerapan FKK dan Teknik MRK Net Receivables Before Implementation of FKK and MRK Techniques		Tagihan Bersih Setelah Penerapan FKK dan Teknik MRK Net Receivables After Implementation of FKK and MRK Techniques		ATMR dan Rata-Rata Bobot Risiko RWA and Risk Weight Average		Portfolio Category
		Laporan Posisi Keuangan Statements of Financial Position	TRA	Laporan Posisi Keuangan Statements of Financial Position	TRA	ATMR	Rata-Rata Bobot Risiko (e/(c+d)) Risk Weight Average (e/(c+d))	
		a	b	c	d	e	f	
11.	Tagihan yang Telah Jatuh Tempo	**351,923**	**5,655**	**351,923**	**-**	**332,726**	**95%**	Due Receivables
12.	Aset Lainnya	**891,904**	**-**	**891,904**	**-**	**993,429**	**111%**	Other Assets
	Total	**36,182,883**	**7,013,282**	**34,220,261**	**1,654,563**	**19,283,361**	**54%**	**Total**

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur risiko kredit dan dampak teknik MRK secara konsolidasi karena berdasarkan Surat Peraturan Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

1. The Bank has no exposure to credit risk and the impact of MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a Subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5)
Disclosure of Exposure by Asset Class and Risk Weight (CR5)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
1.	Tagihan kepada Pemerintah Receivables from Government	8,392,649	-	-	-	-	-	8,392,649

No.	Kategori Portofolio Portfolio Category	20%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
2.	Tagihan kepada Entitas Sektor Publik Receivables from Public Sector Entities	1,158,135	169,630	-	-	-	1,327,766

No.	Kategori Portofolio Portfolio Category	0%	20%	30%	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
3.	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables from Multilateral Development Banks and International Institutions	-	-	-	14,731	-	-	-	14,731

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	20%	30%	40%	50%	75%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
4.	Tagihan kepada Bank Receivables from Banks	2,616,745	-	16,445	-	-	-	-	-	2,633,189
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Receivables from Securities Companies and Other Financial Services Institutions	1,685,637	762,054	1,212,050	142,933	-	-	-	-	3,802,674

No.	Kategori Portofolio Portfolio Category	10%	15%	20%	25%	35%	50%	100%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
5.	Tagihan berupa *Covered Bond* Receivables in the form of Covered Bond	-	-	-	-	-	-	-	-	-

No.	Kategori Portofolio Portfolio Category	20%	50%	65%	75%	80%	85%	100%	130%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
6.	Tagihan kepada Korporasi Umum Receivables from General Corporations	986,182	1,820,994	-	42,942	-	997,498	8,107,028	-	-	-	11,954,644
	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain Receivables from Securities Companies and Other Financial Services Institutions	-	-	-	-		-	-		-	-	-
	Eksposur Pembiayaan Khusus Special Financing Exposure	-	-		-	-		-	-	-	-	-

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	100%	150%	250%	400%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
7.	Tagihan kepada Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal lainnya Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments	-	-	-	-	-	-

No.	Kategori Portofolio Portfolio Category	45%	75%	85%	100%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
8.	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables from Microbusiness, Small Business, and Retail Portfolio	-	-	2,208,821	-	-	2,208,821

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	25%	30%	35%	40%	45%	50%	60%	65%[5)]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
9.	Kredit Beragun Properti Property Collateralized Loans																				
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Residential Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow		17,707	2,502	56,356		21,382		21,702			41,706									161,356
	Tanpa Pendekatan Pembagian Kredit Without Loan Sharing Approach																				
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin) Using a Loan Sharing Approach (Guaranteed)																				

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	25%	30%	35%	40%	45%	50%	60%	65%[5)]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin) Using a Loan Sharing Approach (Guaranteed)																				
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Residential Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow																				
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Commercial Property Collateralized Loans which the Payments are Not Materially Dependent on Property Cash Flow																				

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	25%	30%	35%	40%	45%	50%	60%	65%[5)]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Tanpa Pendekatan Pembagian Kredit Without Loan Sharing Approach																				
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin) Using A Loan Sharing Approach (Guaranteed)																				
	Dengan Menggunakan Pendekatan Pembagian Kredit (Dijamin) Using A Loan Sharing Approach (Guaranteed)																				
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Commercial Property Collateralized Loans which the Payments are Materially Dependent on Property Cash Flow											1,249,194			547,889			2,338,086			4,135,169

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio Portfolio Category	0%	20%	25%	30%	35%	40%	45%	50%	60%	65%[5)]	70%	75%	85%	90%	100%	105%	110%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Land Acquisition, Land Processing, and Construction Loans																				

No.	Kategori Portofolio Portfolio Category	50%	100%	150%	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
10.	Tagihan yang Telah Jatuh Tempo Due Receivables	50,880	288,557	12,486	-	351,923

No.	Kategori Portofolio Portfolio Category	0%	20%	100%	150%	1,250%[5)]	Lainnya Other	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivables After FKK and MRK Techniques
11.	Aset Lainnya Other Assets	46,336	-	549,845	295,723	-	-	891,904

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

No.	Bobot Risiko Risk Weight	Tagihan Bersih Laporan Posisi Keuangan Net Receivables Statement of Financial Position	Tagihan Bersih TRA (Sebelum Pengenaan FKK) Net Receivables TRA (Before FKK imposition)	Rata - Rata FKK FKK Average	Tagihan Bersih (Setelah Pengenaan FKK dan Teknik MRK) Net Receivables (After FKK and MRK Techniques)
1.	<40%	**15,488,553**	**3,363,155**	**10.00%**	**15,724,303**
2.	40%-70%	**4,504,527**	**1,250,519**	**35.71%**	**4,761,647**
3.	75%	**42,942**	**-**	**0.00%**	**42,942**
4.	85%	**2,662,400**	**2,228,266**	**50.00%**	**3,206,319**
5.	90%-100%	**10,890,743**	**39,900**	**40.00%**	**9,493,319**
6.	105%-130%	**2,285,509**	**131,443**	**40.00%**	**2,338,086**
7.	150%	**308,209**	**-**	**0.00%**	**308,209**
8.	250%	**-**	**-**	**0.00%**	**-**
9.	400%	**-**	**-**	**0.00%**	**-**
10.	1.250%	**-**	**-**	**0.00%**	**-**
11.	**Total Tagihan Bersih** Total Net Receivables	**36,182,883**	**7,013,282**	**17.57%**	**35,874,824**

2) Pengungkapan Tambahan / Additional Disclosure

1. Bank tidak memiliki eksposur risiko kredit dan dampak teknik MRK secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.
1. The Bank has no exposure to credit risk and the impact of MRK techniques on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Decision Letter No. 113/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a Subsidiary of PT Bank Victoria International Tbk.

Pengungkapan Analisis Eksposur *Counterparty Credit Risk* (CCR1)
Disclosure of Exposure Analysis of Counterparty Credit Risk (CCR1)

Bank tidak memiliki eksposur *Counterparty Credit Risk* (CCR1).

The Bank has no exposure of Counterparty Credit Risk (CCR1).

Pengungkapan Eksposur CCR Berdasarkan Kategori Portofolio dan Bobot Risiko (CCR3)
CCR Exposure by Portfolio Category and Risk Weight (CCR3)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2025 / 31 December 2025									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Indonesia	-	-	-	-	-	-	-	-	-	Indonesia
Tagihan kepada Pemerintah dan Bank Sentral	-	-	-	-	-	-	-	-	-	Claims Against Government and Central Bank
Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	Claims Against Public Sector Entities
Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims Against Multilateral Development Banks and International Institutions
Tagihan kepada Bank Lain	-	-	-	-	-	-	-	-	-	Receivables from Other Banks
Tagihan berupa *Covered Bond*	-	-	-	-	-	-	-	-	-	Receivables in the form of Covered Bond
Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	-	-	-	-	-	-	-	-	-	Receivables from Securities Companies and Other Financial Services Institutions
Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2025 / 31 December 2025									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Kredit Beragunan Properti Rumah Tinggal	-	-	-	-	-	-	-	-	-	Residential Property Collateralized Loans
Kredit Beragunan Properti Komersial	-	-	-	-	-	-	-	-	-	Commercial Property Collateralized Loans
Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Receivables from Corporations
Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio
Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	-	Due Receivables
Aset lainnya	-	-	-	-	-	-	-	-	-	Other Assets
Total	-	-	-	-	-	-	-	-	-	**Total**

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2024 / 31 December 2024									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Indonesia	-	-	-	-	-	-	-	-	-	Indonesia
Tagihan kepada Pemerintah dan Bank Sentral	-	-	-	-	-	-	-	-	-	Claims Against Government and Central Bank
Tagihan kepada Entitas Sektor Publik	-	-	-	-	-	-	-	-	-	Claims Against Public Sector Entities
Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional	-	-	-	-	-	-	-	-	-	Claims Against Multilateral Development Banks and International Institutions
Tagihan kepada Bank Lain	-	-	197,776	-	-	-	-	-	197,776	Receivables from Other Banks
Tagihan berupa *Covered Bond*	-	-	-	-	-	-	-	-	-	Receivables in the form of Covered Bond
Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya	-	-	-	-	-	-	-	-	-	Receivables from Securities Companies and Other Financial Services Institutions
Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya	-	-	-	-	-	-	-	-	-	Receivables in the form of Subordinated Securities/ Receivables, Equity, and Other Capital Instruments
Kredit Beragunan Properti Rumah Tinggal	-	-	-	-	-	-	-	-	-	Residential Property Collateralized Loans
Kredit Beragunan Properti Komersial	-	-	-	-	-	-	-	-	-	Commercial Property Collateralized Loans
Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi	-	-	-	-	-	-	-	-	-	Loan by Land Acquisition, Land Processing, and Construction
Kredit Pegawai/Pensiunan	-	-	-	-	-	-	-	-	-	Employee/Retirement Loans
Tagihan kepada Korporasi	-	-	-	-	-	-	-	-	-	Receivables from Corporations
Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel	-	-	-	-	-	-	-	-	-	Receivables from Microbusiness, Small Business, and Retail Portfolio

(dalam juta Rupiah / in million Rupiah)

Bobot Risiko / Kategori Portofolio	31 Desember 2024 / 31 December 2024									Risk Weight / Portfolio Category
	a	b	c	d	e	f	g	h	i	
	0%	10%	20%	50%	75%	100%	150%	Lainnya Other	Total Tagihan Bersih Total Net Receivables	
Tagihan yang Telah Jatuh Tempo	-	-	-	-	-	-	-	-	-	Due Receivables
Aset lainnya	-	-	-	-	-	-	-	-	-	Other Assets
Total	**-**	**-**	**197,776**	**-**	**-**	**-**	**-**	**-**	**197,776**	**Total**

Tabel Pengungkapan Tagihan Bersih Derivatif Kredit (CCR6)
Table of Disclosure of Net Receivables of Credit Derivative (CCR6)

Bank tidak memiliki eksposur Derivatif Kredit (CCR6)

The Bank has no Credit Derivative Exposure (CCR6)

Eksposur Sekuritisasi pada *Banking Book* (Tabel SEC1)
Securitization Exposures in the Banking Book (Tabel SEC1)

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2025 / 31 December 2025									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai *Originator* / Bank as Originator			Bank sebagai Sponsor / Bank as Sponsor			Bank sebagai Investor / Bank as Investor			
		Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Subtotal	
1.	Ritel (Total) – Antara Lain	-	-	-	-	-	-	**265**	-	**265**	Retail (Total) - Among Others
2.	Kredit Perumahan	-	-	-	-	-	-	**265**	-	**265**	Housing Loans
3.	Kartu Kredit	-	-	-	-	-	-	-	-	-	Credit Cards

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2025 / 31 December 2025									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai *Originator* / Bank as Originator			Bank sebagai Sponsor / Bank as Sponsor			Bank sebagai Investor / Bank as Investor			
		Tradisional / Traditional	Sintetis / Synthetic	Subtotal	Tradisional / Traditional	Sintetis / Synthetic	Subtotal	Tradisional / Traditional	Sintetis / Synthetic	Subtotal	
4.	Eksposur Ritel Lainnya	-	-	-	-	-	-	-	-	-	Other Retail Exposures
5.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization
6.	Non-Ritel (Total) – Antara Lain:	-	-	-	-	-	-	-	-	-	Non-Retail (Total) - Among Others:
7.	Kredit Korporasi	-	-	-	-	-	-	-	-	-	Corporate Loans
8.	Kredit Komersil	-	-	-	-	-	-	-	-	-	Commercial Credit
9.	Sewa dan Piutang	-	-	-	-	-	-	-	-	-	Rent and Accounts Receivable
10.	Non-Ritel Lainnya	-	-	-	-	-	-	-	-	-	Other Non-Retail
11.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 / 31 December 2024									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai *Originator* / Bank as Originator			Bank sebagai Sponsor / Bank as Sponsor			Bank sebagai Investor / Bank as Investor			
		Tradisional / Traditional	Sintetis / Synthetic	Subtotal	Tradisional / Traditional	Sintetis / Synthetic	Sub-total	Tradisional / Traditional	Sintetis / Synthetic	Sub-total	
1.	Retail (Total) – Antara Lain:	-	-	-	-	-	-	1,011	-	1,011	Retail (Total) - Among Others:
2.	Kredit Perumahan	-	-	-	-	-	-	1,011	-	1,011	Housing Loans
3.	Kartu Kredit	-	-	-	-	-	-	-	-	-	Credit Cards
4.	Eksposur Ritel Lainnya	-	-	-	-	-	-	-	-	-	Other Retail Exposures
5.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 31 December 2024									Portofolio Category
		a	b	c	e	f	g	i	j	k	
		Bank sebagai *Originator* Bank as Originator			Bank sebagai Sponsor Bank as Sponsor			Bank sebagai Investor Bank as Investor			
		Tradisional Traditional	Sintetis Synthetic	Subtotal	Tradisional Traditional	Sintetis Synthetic	Sub-total	Tradisional Traditional	Sintetis Synthetic	Sub-total	
6.	Non-Retail (Total) – Antara Lain:	-	-	-	-	-	-	-	-	-	Non-Retail (Total) - Among Others:
7.	Kredit Korporasi	-	-	-	-	-	-	-	-	-	Corporate Loans
8.	Kredit Komersil	-	-	-	-	-	-	-	-	-	Commercial Credit
9.	Sewa dan Piutang	-	-	-	-	-	-	-	-	-	Rent and Accounts Receivable
10.	Non-Retail Lainnya	-	-	-	-	-	-	-	-	-	Other Non-Retail
11.	Re-Sekuritisasi	-	-	-	-	-	-	-	-	-	Re-Securitization

Analisis Kualitatif Qualitative Analysis	
Bank melakukan investasi pada pihak ketiga (produk EBA) yang mempunyai peringkat *investment grade* AAA s.d AA- sebagai upaya untuk mendiversifikasi risiko likuiditas (*liquidity facility*) dan *return*.	Bank invests in third parties (ABS products) with investment grade ratings of AAA to AA- as an effort to diversify liquidity risk (liquidity facility) and returns.

Eksposur Sekuritisasi pada *Trading Book* (Tabel SEC2)
Securitization Exposure in the Trading Book (Table SEC2)

Bank tidak memiliki eksposur sekuritisasi pada *trading book*.

The Bank has no securitization exposure in the trading book.

Eksposur Sekuritisasi pada *Banking Book* dan terkait Persyaratan Modalnya – Bank yang Bertindak sebagai *Originator* atau Sponsor (SEC3)
Securitization Exposure in the Banking Book and related to Its Capital Requirements – Bank Acting as Originator or Sponsor (SEC3)

Bank tidak memiliki eksposur sekuritisasi pada *Banking Book* sebagai *Originator* atau Sponsor.

The Bank has no securitization exposure in the Banking Book as Originator or Sponsor.

Eksposur Sekuritisasi pada *Banking Book* dan Persyaratan Modalnya – Bank yang Bertindak sebagai Investor (SEC4)
Securitization Exposure in Banking Book and Related to Its Capital Requirements – Bank Acting as Investor (SEC4)

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2025 31 December 2025																	Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai Eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai Eksposur (berdasarkan *Regulatory Approach*) Exposure Value (based on Regulatory Approach)				ATMR (berdasarkan *Regulatory Approach*) ATMR (based on Regulatory Approach)				Capital Charge After Cap				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% s.d. 50% Bobot Risiko >20% to 50% Risk Weighted	>50% s.d. 100% Bobot Risiko >50% to 100% Risk Weighted	>100% s.d. <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250% Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1.250%	IRB RBA	IRB SFA	SA/ SSFA	1.250%	IRB RBA	IRB SFA	SA/ SSFA	1.250%	
1.	Total Eksposur	265	-	-	-	-		-	265	-		-	53	-		-	53	-	Total Exposure
2.	Sekuritisasi Tradisional	265	-	-	-	-		-	265	-		-	53	-		-	53	-	Traditional Securitization
3.	Dimana *Underlying* Sekuritisasi	265	-	-	-	-		-	265	-		-	53	-		-	53	-	In which the Underlying Securitization
4.	Ritel	265	-	-	-	-		-	265	-		-	53	-		-	53	-	Retail
5.	Non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
6.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
7.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
8.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior
9.	Sekuritisasi Sintetis	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Synthetic Securitization
10.	Dimana *Underlying* Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which the Underlying Securitization
11.	Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Retail
12.	Non-Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
13.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
14.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
15.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior

(dalam juta Rupiah / in million Rupiah)

No.	Kategori Portofolio	31 Desember 2024 31 December 2024																Portofolio Category
		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	
		Nilai Eksposur (berdasarkan Bobot Risiko) Exposure Value (based on Risk Weight)					Nilai Eksposur (berdasarkan *Regulatory Approach*) Exposure Value (based on Regulatory Approach)				ATMR (berdasarkan *Regulatory Approach*) ATMR (based on Regulatory Approach)				Capital Charge After Cap				
		≤20% Bobot Risiko ≤20% Risk Weighted	>20% to 50% Bobot Risiko >20% to 50% Risk Weighted	>50% to 100% Bobot Risiko >50% to 100% Risk Weighted	>100% to <1.250 % Bobot Risiko >100% to <1,250% Risk Weighted	1.250% Bobot Risiko 1,250% Risk Weighted	IRB RBA	IRB SFA	SA/ SSFA	1.250%	IRB RBA	IRB SFA	SA/ SSFA	1.250%	IRB RBA	IRB SFA	SA/ SSFA	1.250%	
1.	Total Eksposur	1,011	-	-	-	-		-	1,011	-		-	202	-		-	202	-	Total Exposure
2.	Sekuritisasi Tradisional	1,011	-	-	-	-		-	1,011	-		-	202	-		-	202	-	Traditional Securitization
3.	Dimana *Underlying* Sekuritisasi	1,011	-	-	-	-		-	1,011	-		-	202	-		-	202	-	In which the Underlying Securitization
4.	Ritel	1,011	-	-	-	-		-	1,011	-		-	202	-		-	202	-	Retail
5.	Non-ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
6.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
7.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
8.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior
9.	Sekuritisasi Sintetis	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Synthetic Securitization
10.	Dimana *Underlying* Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which the Underlying Securitization
11.	Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Retail
12.	Non-Ritel	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Retail
13.	Dimana Re-Sekuritisasi	-	-	-	-	-		-	-	-		-	-	-		-	-	-	In which Re-Securitization
14.	Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Senior
15.	Non-Senior	-	-	-	-	-		-	-	-		-	-	-		-	-	-	Non-Senior

Analisis Kualitatif
Qualitative Analysis

Untuk eksposur sekuritisasi pada *banking book*, perhitungan ATMR risiko kredit dilakukan dengan menggunakan pendekatan standar (*standardized approach*), dimana sekuritisasi tersebut memiliki *investment grade* AAA s.d AA- yang memiliki bobot 20% pada perhitungan ATMR.

For securitization exposure in the banking book, credit risk RWA is calculated by using a standardized approach, in which the securitization has investment grade of AAA to AA- with a 20% weight in RWA calculation.

Pengungkapan Risiko Pasar dengan Menggunakan Metode Standar
Disclosure of Market Risk Using Standardized Method

1) Bank secara Individual / Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Risiko	Beban Modal Pendekatan Standar Desember 2025 Standard Approach Capital Expenses December 2025	Beban Modal Pendekatan Standar Desember 2024 Standard Approach Capital Expenses December 2024	Risk
1.	Risiko GIRR	-	20	GIRR Risk
2.	Risiko CSR Non-Sekuritisasi	-	-	CSR Risk Non-Securitization
3.	Risiko CSR Sekuritisasi Non-CTP	-	-	CSR Risk Securitization Non-CTP
4.	Risiko CSR Sekuritisasi CTP	-	-	CSR Risk Securitization CTP
5.	Risiko Ekuitas	-	-	Equity Risk
6.	Risiko Komoditas	-	-	Commodity Risk
7.	Risiko Nilai Tukar	**50,162**	62,393	Exchange Rate Risk
8.	DRC - Non-sekuritisasi	-	-	DRC - Non-Securitization
9.	DRC - Sekuritisasi Non-CTP	-	-	DRC - Securitization Non-CTP
10.	DRC - Sekuritisasi CTP	-	-	DRC - Securitization CTP
11.	RRAO	-	-	RRAO
12.	**Total**	**50,163**	62,414	**Total**

Tabel *Interest Rate Risk in Banking Book* - Laporan Penerapan Manajemen Risiko untuk *IRRBB*
Table of Interest Rate Risk in the Banking Book - Report on Risk Management Implementation for IRRBB

Bank berada dalam Buku 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak memenuhi kriteria untuk mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sesuai Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018 tanggal 21 Agustus 2018 tentang Penerapan Manajemen Risiko dan Pengukuran Risiko Pendekatan Standar untuk Risiko Suku Bunga dalam *Banking Book* (IRRBB) bagi Bank Umum. Dalam hal mengendalikan risiko suku bunga pada *banking book*, Bank menggunakan analisa sensitivitas berdasarkan *maturity gap* yang disusun dalam rangka pemenuhan ketentuan mengenai penilaian tingkat kesehatan Bank Umum dan penerapan manajemen risiko bagi Bank Umum. Parameter tersebut dapat memberikan indikasi atas risiko terhadap perspektif nilai ekonomis dan perspektif pendapatan Bank yang timbul dari pergerakan skenario suku bunga dalam kondisi *shock* yang mempengaruhi posisi *banking book* pada Bank.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not meet the criteria for disclosing a report on the calculation of Interest Rate Risk in Banking Book (IRRBB) according to Financial Services Authority Circular No. 12/SEOJK.03/2018 dated 21 August 2018 on Implementation of Risk Management and Standard Approach for Risk Measurement for Interest Rate Risk in the Banking Book (IRRBB) for Commercial Banks. In terms of controlling interest rate risk in the banking book, the Bank uses a sensitivity analysis based on a maturity gap which is prepared in order to comply with the provisions on assessment of soundness level of Commercial Banks and the implementation of risk management for Commercial Banks. These parameters can provide an indication of risks to the economic value perspective and the Bank's income perspective arising from fluctuations in interest rate scenarios under shock conditions that affect the banking book position at the Bank.

Tabel *Interest Rate Risk in Banking Book* - Laporan Perhitungan IRRBB
Table of Interest Rate Risk in Banking Book - IRRBB Calculation Report

Bank kelompok BUKU 2 (Kelompok Bank Modal Inti/KBMI 1, berdasarkan Peraturan Otoritas Jasa Keuangan No. 12/POJK.03/2021) dan tidak mengungkapkan laporan perhitungan *Interest Rate Risk in Banking Book* (IRRBB) sebagaimana diatur didalam Surat Edaran Otoritas Jasa Keuangan No. 12/SEOJK.03/2018.

The Bank is in BUKU 2 group (Core Capital Bank Group/KBMI 1, based on Financial Services Authority Regulation No. 12/POJK.03/2021) and does not report the calculation of Interest Rate Risk in Banking Book (IRRBB) as stipulated in the Financial Services Authority Circular No. 12/SEOJK.03/2018.

Pengungkapan Risiko Likuiditas
Disclosure of Liquidity Risk

Pengungkapan Laporan Perhitungan Rasio Kecukupan Likuiditas (LCR)
Disclosure of Liquidity Coverage Ratio (LCR) Calculation Report

Nama Bank : PT Bank Victoria International Tbk
Bank Name
Posisi Laporan : Desember 2025
Reporting Position : December 2025

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	Individual Individually Posisi Tanggal Laporan Reporting Date Position		Component
		Nilai *Outstanding* Kewajiban dan Komitmen/Nilai Tagihan Kontraktual Outstanding Value of Liabilities and Commitments/Contractual Receivables Value	Nilai HQLA setelah Pengurangan Nilai (*Haircut*), *Outstanding* Kewajiban dan Komitmen Dikalikan Tingkat Penarikan (*Run-Off Rate*) atau Nilai Tagihan Kontraktual Dikalikan Tingkat Penerimaan (*Inflow Rate*) HQLA Value Less Haircut, Outstanding Liabilities and Commitments Multiplied by Run-Off Rate or Contractual Receivables Value Multiplied by Inflow Rate	
1.	Jumlah Data Poin yang Digunakan dalam Perhitungan LCR		**21 hari** 21 days	Number of Data Points Used in the LCR Calculation
High Quality Liquid Asset (HQLA)				
2.	Total *High Quality Liquid Asset* (HQLA)		**8,810,997.57**	Total High Quality Liquid Asset (HQLA)

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	Individual Individually		Component
		Posisi Tanggal Laporan Reporting Date Position		
		Nilai *Outstanding* Kewajiban dan Komitmen/Nilai Tagihan Kontraktual Outstanding Value of Liabilities and Commitments/Contractual Receivables Value	Nilai HQLA setelah Pengurangan Nilai (*Haircut*), *Outstanding* Kewajiban dan Komitmen Dikalikan Tingkat Penarikan (*Run-Off Rate*) atau Nilai Tagihan Kontraktual Dikalikan Tingkat Penerimaan (*Inflow Rate*) HQLA Value Less Haircut, Outstanding Liabilities and Commitments Multiplied by Run-Off Rate or Contractual Receivables Value Multiplied by Inflow Rate	
Arus Kas Keluar (*Cash Outflow*) / Cash Outflows				
3.	Simpanan Nasabah Perorangan dan Pendanaan yang Berasal dari Nasabah Usaha Mikro dan Usaha Kecil, Terdiri dari:	**8,583,336.87**	**848,856,24**	Savings from Individual Customers and Funding Derived from Micro and Small Business Customers, Consisting of:
	a. Simpanan/Pendanaan Stabil	**189,548.99**	**9,477,45**	Savings/Funding is Stable
	b. Simpanan/Pendanaan Kurang Stabil	**8,393,787.88**	**839,378,79**	Savings/Funding is Less Stable
4.	Pendanaan yang Berasal dari Nasabah Korporasi, Terdiri dari:	**7,183,779.77**	**3,501,386.29**	Funding Derived from Corporate Customers, Consisting of:
	a. Simpanan Operasional	**1,245,084.65**	**296,309,42**	a. Operational Savings
	b. Simpanan Non-Operasional dan/atau Kewajiban Lainnya yang Bersifat Non-Operasional	**5,938,695.12**	**3,205,076.87**	b. Non-Operational Deposits and/or Other Non-Operational Liabilities
	c. Surat Berharga berupa Surat Utang yang Diterbitkan oleh Bank (*Unsecured Debt*)	**0.00**	**0.00**	c. Securities in the Form of Debt Securities Issued by Banks
5.	Pendanaan dengan Agunan (*Secured Funding*)		**0.00**	Funding with Collateral (Secured Funding)
6.	Arus Kas Keluar Lainnya (*Additional Requirement*), Terdiri dari:	**1,042,497.18**	**145,391,03**	Other Cash Outflows (Additional Requirements), Consisting of:
	a. Arus Kas Keluar atas Transaksi Derivatif	**405,20**	**405,20**	a. Cash Outflows from Derivative Transactions
	b. Arus Kas Keluar atas Peningkatan Kebutuhan Likuiditas	**0,00**	**0,00**	b. Cash Outflows from Increased Liquidity Needs
	c. Arus Kas Keluar atas Kehilangan Pendanaan	**0,00**	**0,00**	c. Cash Outflows for Loss of Funding
	d. Arus Kas Keluar atas Penarikan Komitmen Fasilitas Kredit dan Fasilitas Likuiditas	**574,403,63**	**140,238,38**	d. Cash Outflows for Withdrawal of Committed Credit Facilities and Liquidity Facilities
	e. Arus Kas Keluar atas Kewajiban Kontraktual Lainnya terkait Penyaluran Dana	**0.00**	**0.00**	e. Cash Outflows on Other Contractual Liabilities Related to Distribution of Funds
	f. Arus Kas Keluar atas Kewajiban Kontingensi Pendanaan Lainnya	**467,688,35**	**4,747,45**	f. Cash Outflows from Other Funding Contingent Liabilities
	g. Arus Kas Keluar Kontraktual Lainnya	**0.00**	**0.00**	g. Other Contractual Cash Outflows
7.	**Total Arus Kas Keluar (*Cash Outflow*)**		**4,495,633.55**	**Total Cash Outflows**

(dalam juta Rupiah / in million Rupiah)

No.	Komponen	Individual Individually Posisi Tanggal Laporan Reporting Date Position		Component
		Nilai *Outstanding* Kewajiban dan Komitmen/Nilai Tagihan Kontraktual Outstanding Value of Liabilities and Commitments/Contractual Receivables Value	Nilai HQLA setelah Pengurangan Nilai (*Haircut*), *Outstanding* Kewajiban dan Komitmen Dikalikan Tingkat Penarikan (*Run-Off Rate*) atau Nilai Tagihan Kontraktual Dikalikan Tingkat Penerimaan (*Inflow Rate*) HQLA Value Less Haircut, Outstanding Liabilities and Commitments Multiplied by Run-Off Rate or Contractual Receivables Value Multiplied by Inflow Rate	
Arus Kas Masuk (*Cash Inflow*) / Cash Inflow				
8.	Pinjaman dengan Agunan *Secured Lending*	**0.00**	**0.00**	Loans with Collateral Secured Lending
9.	Tagihan Berasal dari Pihak Lawan (*Counterparty*) yang Bersifat Lancar (*Inflows from Fully Performing Exposures*)	**1,151,292.50**	**773,442.76**	Inflows from Fully performing Exposures Coming from Counterparty
10.	Arus Kas Masuk Lainnya	**441,74**	**441,74**	Other Cash Inflows
11.	**Total Arus Kas Masuk (*Cash Inflow*)**	**1,151,734.24**	**773,884.50**	**Total Cash Inflows**
Total *Adjusted Value*				
12.	**Total HQLA**		**8,810,997.57**	**Total HQLA**
13.	**Total Arus Kas Keluar Bersih (*Net Cash Outflows*)**		**3,721,749.05**	**Total Net Cash Outflows**
14.	**LCR (%)**		**236.74%**	**LCR (%)**

Pengungkapan Risiko Likuiditas
Table of Disclosure of Liquidity Risk

Pengungkapan Laporan NSFR
Disclosure of NSFR Report

Nama Bank : PT Bank Victoria International Tbk
Bank Name
Posisi Laporan : Desember 2025
Reporting Position December 2025

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2025 September 2025					Desember 2025 December 2025				
		Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value	Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year	
1.	Modal: Capital:	4,248,674.93	0.00	0.00	1,196,520.92	5,445,195.85	4,308,016.70	0.00	0.00	1,047,668.79	5,355,685.49
2.	Modal sesuai Peraturan Otoritas Jasa Keuangan KPMM Capital According to CAR Financial Services Authority Regulations	4,248,674.93	0.00	0.00	1,196,520.92	5,445,195.85	4,308,016.70	0.00	0.00	1,047,668.79	5,355,685.49
3.	Instrumen Modal Lainnya Other Capital Instruments	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4.	Simpanan yang Berasal dari Nasabah Perorangan dan Pendanaan yang Berasal dari Nasabah Usaha Mikro dan Usaha Kecil: Deposits Originating from Individual Customers and Funding from Micro and Small Business Customers:	4,382,883.60	8,739,825.70	664,319.93	300.00	12,421,529.80	4,513,330.34	8,318,601.44	534,889.26	0.00	12,043,134.04
5.	Simpanan dan Pendanaan Stabil Stable Savings and Funding	246,339.67	7,001,52	4,728,72	0.00	245,166.42	248,427.21	10,974.82	500.00	0.00	246,906.93
6.	Simpanan dan Pendanaan Kurang Stabil Less Stable Savings and Funding	4,136,543.93	8,732,824.18	659,591.21	300.00	12,176,363.38	4,264,903.13	8,307,626.62	534,389.26	0.00	11,796,227.11
7.	Pendanaan yang Berasal dari Nasabah Korporasi: Funding Derived from Corporate Customers:	2,782,188.62	7,693,868.90	242,722.86	2,173,840.54	6,092,991.95	2,612,966.70	10,044,402.88	359,125.00	2,299,294.75	6,260,387.74
8.	Simpanan Operasional Operational Savings	1,024,312.83	0.00	0.00	0.00	512,156.42	805,016.52	0.00	0.00	0.00	402,508.26
9.	Pendanaan Lainnya yang Berasal dari Nasabah Korporasi Other Funding Derived from Corporate Customers	1,757,875.79	7,693,868.90	242,722.86	2,173,840.54	5,580,835.53	1,807,950.18	10,044,402.88	359,125.00	2,299,294.75	5,857,879.48
10.	Liabilitas yang Memiliki Pasangan Aset yang Saling Bergantung Liabilities that Have Interdependent Asset Pairs	0.00	0.00	0.00	0.00	0.00	0.00	693,569.22	0.00	0.00	0.00

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2025 September 2025					Desember 2025 December 2025				
		Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value	Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year	
11.	Liabilitas dan Ekuitas Lainnya: Liabilities and Other Equity:	332,883.65	89,945.60	249,188.50	0.00	124,594.25	300,478.43	274,298.16	149,619.29	0.00	74,809.65
12.	NSFR Liabilitas *Derivative* NSFR Derivative Liability		598.00	598.00	598.00			3,551.10	3,551.10	3,551.10	
13.	Ekuitas dan Liabilitas Lainnya yang Tidak Masuk dalam Kategori di Atas Equity and Other Liabilities Not Included in the Above Categories	332,883.65	89,347.60	249,188.50	0.00	124,594.25	300,478.43	270,747.06	149,619.29	0.00	74,809.65
14.	Total ASF					24,084,311.85					23,734,016.92
15.	Total HQLA dalam Rangka Perhitungan NSFR Total HQLA for the NSFR Calculation					336,450.27					424,831.54
16.	Simpanan pada Lembaga Keuangan Lain untuk Tujuan Operasional Deposits on Other Financial Institutions for Operational Purposes	148,532.73	0.00	0.00	0.00	74,266.37	316,560.85	0.00	0.00	0.00	158,280.43
17.	Pinjaman dengan Kategori Lancar dan dalam Perhatian Khusus (*Performing*) Loans in Current and Special Mention Category (Performing)	0.00	6,969,903.22	5,160,123.91	11,485,497.94	15,598,487.54	0.00	8,845,298.14	5,715,754.45	11,894,072.16	16,657,476.38
18.	Kepada Lembaga Keuangan yang Dijamin dengan HQLA Level 1 To Financial Institutions Guaranteed with HQLA Level 1	0.00	71,048.65	0.00	0.00	7,104.87	0.00	0.00	0.00	0.00	0.00
19.	Kepada Lembaga Keuangan yang Dijamin Bukan dengan HQLA Level 1 dan Pinjaman kepada Lembaga Keuangan Tanpa Jaminan To a Guaranteed Financial Institution Not with HQLA Level 1 and a Loan to an Insecured Financial Institution	0.00	1,347,120.48	1,633,982.00	1,816,463.29	2,835,522.36	0.00	2,293,750.66	390,991.41	729,833.06	1,269,391.36
20.	Kepada Korporasi Non-Keuangan, Nasabah *Retail* dan Nasabah Usaha Mikro dan Kecil, Pemerintah Pusat, Pemerintah Negara Lain, Bank Indonesia, Bank Sentral Negara Lain dan Entitas Sektor Publik, yang Di antaranya: To Non-Financial Corporations, Retail Customers and Micro and Small Business Customers, Central Government, Governments of Other Countries, Bank Indonesia, Central Banks of Other Countries and Public Sector Entities, Including:	0.00	4,517,243.63	3,094,608.92	8,214,590.28	10,788,328.02	0.00	5,126,167.77	5,130,591.60	9,021,956.79	12,797,042.96

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2025 September 2025					Desember 2025 December 2025				
		Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value	Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year	
21.	Memenuhi Kualifikasi untuk Mendapat Bobot Risiko 35% atau Kurang, sesuai Surat Edaran Otoritas Jasa Keuangan ATMR untuk Risiko Kredit Qualify for A Weighted Risk of 35% or Less, In Accordance with Financial Services Authority Circular RWA for Credit Risk	0.00	0.00	200,000.00	0.00	100,000.00	0.00	0.00	0.00	190,903.15	124,087.05
22.	Kredit Beragun Rumah Tinggal yang Tidak Sedang Dijaminkan, yang Di antaranya: Unsecured Residential Property Collateralized Loans, which Include:	0.00	347.41	225.16	136.592.50	116,389.91	0.00	214.15	449.90	152,086.91	129,605.90
23.	Memenuhi Kualifikasi untuk Mendapat Bobot Risiko 35% atau Kurang, Sesuai Surat Edaran Otoritas Jasa Keuangan ATMR untuk Risiko Kredit Qualify for a Weighted Risk of 35% or Less, In Accordance with Financial Services Authority Circular RWA for Credit Risk	0.00	365.47	1.202.19	8.785.75	6,494.57	0.00	760.45	243.08	7,464.27	5,353.54
24.	Surat Berharga dengan kategori Lancar dan Kurang Lancar (*Performing*) yang Tidak Sedang Dijaminkan, Tidak Gagal Bayar, dan Tidak Masuk sebagai HQLA, Termasuk Saham yang Diperdagangkan di Bursa Securities with Current and Undercurrent (Performing) Categories that are not being Pledged Collateral, Do Not Default, and are Not Included as HQLA, Including Exchange-Traded Shares	0.00	1,033,777.58	230,105.64	1,309,066.12	1,744,647.81	0.00	1,424,405.11	193,478.46	1,791,827.98	2,331,995.57
25.	Aset yang Memiliki Pasangan Liabilitas yang Saling Bergantung Assets that Have Interdependent Liability Pairs	0.00	0.00	0.00	0.00	0.00	0.00	714,602.23	0.00	0.00	0.00
26.	Aset Lainnya: Other Assets:	147,397.04	692,500.72	240,563.95	700,811.16	1,781,272.87	226,253.95	497,229.58	202,583.72	684,210.92	1,610,278.17
27.	Komoditas Fisik yang Diperdagangkan, Termasuk Emas Physical Commodities Traded, Including Gold	0.00				0.00	0.00				0.00

(dalam juta Rupiah / in million Rupiah)

No.	Keterangan ASF Description of ASF	September 2025 September 2025					Desember 2025 December 2025				
		Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value	Nilai Tercatat berdasarkan Sisa Jangka Waktu Carrying Value based on Remaining Period				Total Nilai Tertimbang Total Weighted Value
		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year		Tanpa Jangka Waktu Without a Period Time	<6 Bulan <6 Months	≥6 Bulan-<1 Tahun ≥6 Months-<1 Year	≥1 Tahun ≥1 Year	
28.	Kas, Surat Berharga dan Aset Lainnya yang Dicatat sebagai *Initial Margin* untuk Kontrak Derivatif dan Kas atau Aset Lain yang Diserahkan sebagai *Default Fund pada Central Counterparty* (CCP) Cash, Securities, and Other Assets Recorded as Initial Margin for Derivative Contracts and Cash or Other Assets Deposited as Default Funds to the Central Counterparty (CCP)		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
29.	NSFR Aset Derivatif NSFR Derivative Assets		2,116.25	2,116.25	2,116.25	2,116.25		278.00	278.00	278.00	278.00
30.	NSFR Liabilitas Derivatif sebelum Dikurangi dengan *Variation Margin* NSFR Derivative Liability before Deduction of Variation Margin		0.00	0.00	0.00	0.00		0.00	0.00	0.00	0.00
31.	Seluruh Aset Lainnya yang Tidak Masuk dalam Kategori di Atas All Other Assets Not Included in the Categories Above	147,397.04	69,384.47	240,563.95	700,811.16	1,779,156.62	226,253.155	496,951.58	202,583.72	684,210.92	1,610,000.17
32.	Rekening Administratif Administrative Account		8,585,553.68	8,585,553.68	8,585,553.68	264,883.75		9,057,399.55	9,057,399.55	9,057,399.55	243,007.08
33.	Total RSF					18,055,360.80					19,093,873.60
34.	Rasio Pendanaan Stabil Bersih (*Net Stable Funding Ratio* (%) Net Stable Funding Ratio (%)					133.39%					124.30%

Pengungkapan Risiko Likuiditas
Disclosure of Liquidity Risk

Pengungkapan Laporan Aset Terikat (*Encumbrance*) (ENC)
Disclosure of Encumbrance (ENC) Report

Nama Bank : PT Bank Victoria International Tbk
Bank Name
Posisi Laporan : Desember 2025
Reporting Position December 2025

(dalam juta Rupiah / in million Rupiah)

Uraian	Aset Terikat (*Encumbered*) Encumbered Asset	Aset yang Disimpan atau Diperjanjikan dengan Bank Sentral Namun Belum Digunakan untuk Menghasilkan Likuiditas Assets Placed or Pledged to Central Bank but Yet	Aset Tidak Terikat (*Unencumbered*) Unencumbered Asset	Total	Description
	a	b	c	d	
Aset-Aset dalam Laporan Posisi Keuangan dapat Disajikan Terperinci Sepanjang Dibutuhkan	**693,569**	**7,285,043**	**1,706,403**	**9,685,015**	Assets in the Statement of Financial Position can be Presented in Detail As Needed

Analisis Kualitatif
Qualitative Analysis

(a) Saat ini, Bank memiliki aset bank yang disimpan atau diperjanjikan dengan Bank Indonesia namun belum digunakan untuk menghasilkan likuiditas yaitu penempatan pada Bank Indonesia sebesar Rp 1.706.402 Juta sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.03/2015 perihal Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) bagi Bank Umum.
(b) Aset Tidak Terikat merupakan aset bank yang memenuhi syarat sebagai HQLA sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.03/2015 perihal Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (*Liquidity Coverage Ratio*) bagi Bank Umum yaitu sebesar Rp 7.285.043 Juta

(a) Currently, the Bank has bank assets that are stored or agreed with Bank Indonesia but have not been used to generate liquidity, namely placement with Bank Indonesia amounting to Rp1,706,402 million as regulated in Financial Services Authority Regulations No. 42/POJK.03/2015 on the Obligation to Fulfill the Liquidity Coverage Ratio for Commercial Banks.
(b) Unencumbered Assets are bank assets that qualify as HQLA as stipulated in Financial Services Authority Regulations No. 42/POJK.03/2015 on the Obligation to Fulfill the Liquidity Coverage Ratio for Commercial Banks, amounting to Rp7,285,043 million

Tabel Pengungkapan Risiko Operasional
Table of Disclosure of Operational Risk

Tabel Pengungkapan Kuantitatif Risiko Operasional - Bank secara Individual
Table of Disclosure of Operational Risk Quantitative - Bank Individually

(dalam juta Rupiah / in million Rupiah)

No.	Pendekatan yang Digunakan	31 Desember 2025 31 December 2025 Jumlah Total	31 Desember 2024 31 December 2024 Jumlah Total	Approach Used
1.	Pendekatan Standar			Standardized Approach
	Komponen Indikator Bisnis (KIB)	**128,254,422,135**	117,338,587,298	Business Indicator Components (KIB)
	Faktor Pengali Kerugian Internal (FPKI)	**1**	1	Internal Loss Multiplier Factor (FPKI)
	Modal Minimum Risiko Operasional (MMRO)	**128,254,422,135**	117,338,587,298	Operational Risk Minimum Capital (MMRO)
	ATMR untuk Risiko Operasional	**1,603,180,276,683**	1,466,732,341,225	RWA for Operational Risk

Tabel Pengungkapan Kuantitatif Risiko Operasional - Bank secara Konsolidasi dengan Entitas Anak
Table of Disclosure of Operational Risk Quantitative - Bank Consolidated with Subsidiaries

Bank tidak memiliki eksposur risiko operasional secara konsolidasi karena berdasarkan Surat Otoritas Jasa Keuangan No. S-301/PB.101/2022 Perihal Penyampaian Keputusan Izin Pengambilalihan Saham PT Bank Victoria Syariah oleh PT Victoria Investama Tbk dan Surat Direksi No. 133/DIR-EKS/12/22 Perihal Laporan Pelaksanaan Divestasi atas Inisiatif Sendiri PT Bank Victoria International Tbk (Bank), maka dengan demikian PT Bank Victoria Syariah tidak lagi menjadi Entitas Anak PT Bank Victoria International Tbk.

The Bank has no operational risk exposure on a consolidated basis due to based on Financial Services Authority Letter No. S-301/PB.101/2022 on Submission of the Decision on Permit to the Acquisition of PT Bank Victoria Syariah's Shares by PT Victoria Investama Tbk and Board of Directors' Letter No. 133/DIR-EKS/12/22 on the Divestment Implementation Report on PT Bank Victoria International Tbk's (Bank) Self Initiative, therefore, PT Bank Victoria Syariah is no longer a Subsidiary of PT Bank Victoria International Tbk.

Tanggung Jawab Sosial dan Lingkungan Hidup

Social and Environmental Responsibility





08.

Sebagai bagian dari sistem keuangan, perbankan memiliki peran vital dalam memperkuat fondasi pertumbuhan ekonomi sekaligus menjaga kestabilan pasar. Dengan menyadari tanggung jawab strategis tersebut, Bank terus mengedepankan praktik usaha yang selaras dengan prinsip keberlanjutan. Pendekatan ini diwujudkan melalui pengelolaan operasional yang memperhatikan keseimbangan antara aspek ekonomi, sosial, dan lingkungan. Selain itu, komitmen tersebut diperkuat dengan pelaksanaan berbagai program Tanggung Jawab Sosial dan Lingkungan (TJSL) yang memberi manfaat nyata bagi masyarakat dan ekosistem sekitar.

As part of the financial system, banking plays a vital role in strengthening the foundations of economic growth while maintaining market stability. Recognizing this strategic responsibility, the Bank continuously prioritizes business practices that are in line with sustainability principles. This approach is realized through operational management that maintains the balance between economic, social, and environmental aspects. Furthermore, such commitment is reinforced by the implementation of various Social and Environmental Responsibility (TJSL) programs that provide tangible benefits to the community and surrounding ecosystems.



Tata Kelola Keberlanjutan
Sustainability Governance

Dalam setiap aktivitas bisnis, Bank selalu berpegang pada prinsip GCG dengan mengintegrasikan pengelolaan risiko yang mencakup aspek ekonomi, sosial, dan lingkungan. Penerapan prinsip ini dilaksanakan melalui berbagai program yang sejalan dengan ketentuan peraturan perundang-undangan serta mengacu pada praktik terbaik Laporan Keberlanjutan. Dalam pelaksanaannya, Bank menjadikan ISO 26000 tentang *Guidance on Social Responsibility* sebagai acuan utama, yaitu:

1. Tata kelola organisasi.
2. Isu produk dan pelanggan.
3. Pemenuhan hak asasi manusia.
4. Praktik ketenagakerjaan, kesehatan, dan keselamatan kerja.
5. Lingkungan hidup.
6. Prosedur operasi yang adil.
7. Pelibatan dan pengembangan masyarakat.

Sebagai wujud dalam memperkuat penerapan GCG, Bank juga senantiasa memasukkan prinsip keuangan berkelanjutan ke dalam setiap lini operasional. Langkah ini dirancang tidak hanya untuk menghasilkan nilai ekonomi, tetapi juga untuk memberikan dampak positif bagi masyarakat serta menjaga kelestarian lingkungan. Penerapan prinsip keuangan berkelanjutan tersebut diinternalisasi melalui berbagai kebijakan dan program strategis, yang dijabarkan lebih lanjut sebagai berikut:

In every business activity, the Bank always adheres to GCG principles by integrating risk management which covers economic, social, and environmental aspects. These principles are implemented through various programs that are in line with applicable laws and regulations and refer to best practices in Sustainability Reporting. In its implementation, the Bank utilizes ISO 26000 on Guidance on Social Responsibility as its primary reference, namely:

1. Organizational governance.
2. Products and customers issues.
3. Fulfillment human rights.
4. Practices of employment, occupational health and safety.
5. Environment.
6. Fair operating procedures.
7. Community engagement and development.

As the manifestation of strengthening GCG implementation, the Bank also consistently incorporates sustainable finance principles into every line of its operations. This step is designed not only to generate economic value but also to have positive impact on society and maintain environmental sustainability. The implementation of sustainable finance principles is internalized through various strategic policies and programs, which are further outlined as follows:

Prinsip Keuangan Berkelanjutan Sustainable Finance Principles	Implementasi di Bank Implementation at the Bank
Investasi Bertanggung Jawab Responsible Investment	Keputusan investasi Bank mempertimbangkan faktor ekonomi, sosial, lingkungan hidup, dan tata kelola agar dapat mengelola risiko secara lebih baik dan menghasilkan keuntungan jangka panjang yang berkelanjutan. The Bank's investment decisions consider the economic, social, environmental, and governance factors in order to manage the risks better and generate long-term, sustainable returns.
Strategi dan Praktik Bisnis Berkelanjutan Sustainable Business Strategies and Practices	Bank berfokus pada pencapaian tujuan jangka panjang dan menetapkan strategi jangka pendek untuk mencapainya. The Bank focuses on achieving long-term goals and setting short-term strategies to achieve them.
Pengelolaan Risiko Sosial dan Lingkungan Hidup Social and Environmental Risk Management	Bank menerapkan prinsip kehati-hatian dalam mengukur risiko sosial dan lingkungan hidup dari aktivitas penghimpunan dan penyaluran dana. The Bank applies the prudence principle in measuring social and environmental risks from the funding and lending activities.
Tata Kelola Governance	Manajemen dan seluruh aktivitas operasi Bank menerapkan pilar governansi korporat, yaitu perilaku beretika, akuntabilitas, transparansi, dan keberlanjutan secara konsisten. The Management and all of the Bank's operational activities consistently apply the corporate governance pillars, namely ethical behavior, accountability, transparency, and sustainability.
Komunikasi yang Informatif Informative Communication	Bank menyediakan laporan yang informatif, mencakup strategi, tata kelola, kinerja, dan prospek ke depan. The Bank provides informative reports, covering strategy, governance, performance, and future prospects.

Prinsip Keuangan Berkelanjutan Sustainable Finance Principles	Implementasi di Bank Implementation at the Bank
Inklusif **Inclusive**	Bank berupaya menjamin ketersediaan dan keterjangkauan produk dan jasa sehingga dapat diakses oleh seluruh lapisan masyarakat, bahkan termasuk yang belum memiliki akses terhadap produk dan jasa perbankan. The Bank strives to ensure the availability and affordability of products and services so that they can be accessed by all levels of community, including those who do not have access to banking products and services.
Pengembangan Sektor Unggulan Prioritas **Priority Leading Sector Development**	Bank mempertimbangkan sektor-sektor unggulan prioritas yang telah ditetapkan oleh pemerintah melalui Rencana Pembangunan Jangka Menengah (RPJM) dan Rencana Pembangunan Jangka Panjang (RPJP). The Bank considers the priority leading sectors that have been determined by the government through the Medium-Term Development Plan (RPJM) and the Long-Term Development Plan (RPJP).
Koordinasi dan Kolaborasi **Coordination and Collaboration**	Dalam rangka menyelaraskan kebijakan, strategi, peluang bisnis, dan inovasi produk dan jasa dengan kepentingan nasional, Bank berpartisipasi dalam forum/kegiatan/kerja sama terkait keuangan berkelanjutan, baik pada tingkat lokal, nasional, maupun regional. To align policies, strategies, business opportunities, and innovation of products and services with national interests, the Bank participates in forums/activities/cooperations related to sustainable finance, at local, national, or regional levels.

Struktur Tata Kelola Keberlanjutan
[POJK E.1]

Penerapan prinsip keuangan berkelanjutan serta pengelolaan aspek Lingkungan, Sosial, dan Tata Kelola (LST) menjadi tanggung jawab bersama seluruh jajaran Bank. Direksi dan Dewan Komisaris berperan aktif dalam mengawasi tata kelola keberlanjutan serta mengevaluasi kinerja terkait LST. Struktur tata kelola keberlanjutan dirancang selaras dengan prinsip GCG yang berlaku di seluruh organisasi. Tugas dan tanggung jawab implementasi keuangan berkelanjutan ditetapkan melalui Surat Keputusan Direksi No. 024/SK-DIR/04/25 tanggal 30 April 2025 tentang Tim Penyusun dan Pelaksana Aksi Keuangan Berkelanjutan, yang diuraikan sebagai berikut:

Sustainable Governance Structure
[POJK E.1]

The implementation of sustainable finance principles and the management of Environmental, Social, and Governance (ESG) aspects are the shared responsibility of all Bank employees. The Board of Directors and Board of Commissioners play an active role in overseeing sustainability governance and evaluating ESG-related performance. The sustainability governance structure is designed in line with GCG principles applicable throughout the organization. The duties and responsibilities for sustainable finance implementation are stipulated in the Board of Directors' Decision Letter No. 024/SK-DIR/04/25 dated 30 April 2025, on the Team for Preparing and Implementing Sustainable Financial Actions, described as follows:

Jabatan Position	Posisi di Bank Position at the Bank
Penanggung Jawab Person in Charge	Direksi Board of Directors
Ketua Chairman	Senior EVP of Change Management Office
Wakil Ketua Merangkap Anggota Vice Chairman concurrently as Member	Head of Change Management Office Division
Anggota Member	• SEVP of Operation & International Banking • SEVP of Business • SEVP of Finance, Accounting & Management Information System • Head of Credit Risk Review Division • Head of HCM & GA Division • Head of Operations & Internal Control Division • Head of Technology Information Division • Head of Compliance, System Procedure & Coordinator Customer Protection Division • Head of Risk Management Division • Head of Corporate Secretary Division • Head of SKAI Division • Head of SME & Consumer Banking Division

Jabatan Position	Posisi di Bank Position at the Bank
	• Head of Commercial Banking Division • Head of Branch Banking Network Division • Head of Accounting Division • Vice Division Head Credit Monitoring & Collection

Koordinasi atas pelaksanaan aksi keuangan berkelanjutan maupun pengelolaan portofolio hijau dijalankan oleh Divisi *Change Management Office* dengan dukungan dari seluruh unit kerja terkait. Untuk memastikan efektivitas penerapan, Bank juga membentuk Tim Penyusun dan Pelaksana Aksi Keuangan Berkelanjutan yang memiliki tugas dan tanggung jawab sebagai berikut:

1. Menetapkan strategi dan kriteria portofolio hijau.
2. Melakukan pemetaan portofolio kredit yang memenuhi kriteria portofolio hijau.
3. Mempersiapkan sistem, kebijakan, dan prosedur.
4. Menyusun dan melaksanakan rencana aksi keuangan berkelanjutan dan/atau portofolio hijau.
5. Mempersiapkan, memonitor, dan menyampaikan laporan dan/atau data terkait aksi keuangan keberlanjutan dan/atau portofolio hijau kepada manajemen dan regulator.
6. Menyusun dan menyampaikan laporan rencana dan laporan realisasi aksi keuangan berkelanjutan, termasuk melakukan publikasi.
7. Mempersiapkan dan melaksanakan rencana *training sustainable finance*.

Coordination of the implementation of sustainable finance actions and green portfolio management is carried out by the Change Management Office Division with support from all relevant work units. To ensure effective implementation, the Bank also establishes Team for Preparing and Implementing Sustainable Financial Actions with the following duties and responsibilities:

1. Determining strategy and criteria for the green portfolio.
2. Mapping loans portfolio that meets the criteria for green portfolio.
3. Preparing system, policies, and procedures.
4. Preparing and implementing sustainable finance action plan and/or green portfolio.
5. Preparing, monitoring, and submitting reports and/or data related to sustainable finance actions and/or green portfolios to the management and regulators.
6. Preparing and submitting reports on sustainable finance action plans and realization reports, including publication.
7. Preparing and implementing sustainable finance training plan.

Pengembangan Kompetensi terkait Keuangan Berkelanjutan [POJK E.2]

Bank menempatkan pengembangan kompetensi terkait aspek LST dan keuangan berkelanjutan sebagai agenda rutin yang dijalankan setiap tahun bagi seluruh karyawan. Pada tahun 2025, sebanyak 16,60% karyawan telah mengikuti berbagai program pelatihan dan sosialisasi yang dirancang untuk meningkatkan pemahaman serta keterampilan dalam mendukung implementasi keuangan berkelanjutan. Adapun ruang lingkup materi pengembangan kompetensi tersebut meliputi:

Competency Development related to Sustainable Finance [POJK E.2]

The Bank places competency development related to ESG and sustainable finance as a routine annual agenda for all employees. In 2025, 16.60% of employees attended various training and dissemination programs designed to improve their understanding and skills in supporting the implementation of sustainable finance. The scope of these competency development materials includes:

Jenjang Jabatan Level of Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers
Dewan Komisaris Board of Commissioners	• *Sharing Session "Suistainable Growth through Digitalization and Strong Governance"* diselenggarakan oleh Internal Bank Victoria • *Webinar "Sustainability Accounting and Reporting in the Financial Services"* diselenggarakan oleh OJK Institute • Sharing Session "Suistainable Growth through Digitalization and Strong Governance" organized by Bank Victoria Internally • Webinar "Sustainability Accounting and Reporting in the Financial Services" organized by OJK Institute
Direksi Board of Directors	• *Sharing Session "Suistainable Growth through Digitalization and Strong Governance"* diselenggarakan oleh Internal Bank Victoria • *Webinar "Sustainability Accounting and Reporting in the Financial Services"* diselenggarakan oleh OJK Institute • Sharing Session "Suistainable Growth through Digitalization and Strong Governance" organized by Bank Victoria Internally • Webinar "Sustainability Accounting and Reporting in the Financial Services" organized by OJK Institute

Jenjang Jabatan Level of Position	Materi Pelatihan dan Penyelenggara Training Materials and Organizers
Senior Executive Vice President	• *Sharing Session "Suistainable Growth through Digitalization and Strong Governance"* diselenggarakan oleh Internal Bank Victoria • *Webinar "Sustainability Accounting and Reporting in the Financial Services"* diselenggarakan oleh OJK Institute • Sharing Session "Suistainable Growth through Digitalization and Strong Governance" organized by Bank Victoria Internally • Webinar "Sustainability Accounting and Reporting in the Financial Services" organized by OJK Institute
Kepala Divisi/Wakil Kepala Divisi Head of Division/Vice Division Head	• *Sharing Session "Suistainable Growth through Digitalization and Strong Governance"* diselenggarakan oleh Internal Bank Victoria • *Webinar "Sustainability Accounting and Reporting in the Financial Services"* diselenggarakan oleh OJK Institute • *Innovative Credit Scoring* dalam Meningkatkan Kualitas dan Inklusi Kredit dan Pengembangan Model *Credit Scoring* untuk Konsumen Asuransi Jiwa diselenggarakan oleh Otoritas Jasa Keuangan • Sharing Session "Suistainable Growth through Digitalization and Strong Governance" organized by Bank Victoria Internally • Webinar "Sustainability Accounting and Reporting in the Financial Services" organized by OJK Institute • Innovative Credit Scoring in Improving Credit Quality and Inclusion and Developing Credit Scoring Model for Life Insurance's Consumers, organized by Financial Services Authority
Officer	• *Sharing Session "Suistainable Growth through Digitalization and Strong Governance"* diselenggarakan oleh Internal Bank Victoria • Webinar *"Sustainability Accounting and Reporting in the Financial Services"* diselenggarakan oleh OJK Institute • Webinar Peningkatan *Awareness* terhadap Risiko Tindak Pidana terkait *Investment Fraud* dan *Green Financial Crime* diselenggarakan oleh Anti-Pencucian Uang dan Pencegahan Pendanaan Terorisme Otoritas Jasa Keuangan • *Workshop* Pelaporan Rencana Kegiatan Literasi dan Inklusi Keuangan melalui Sistem SiPEDULI diselenggarakan oleh Otoritas Jasa Keuangan • *Innovative Credit Scoring* dalam Meningkatkan Kualitas dan Inklusi Kredit dan Pengembangan Model *Credit Scoring* untuk Konsumen Asuransi Jiwa diselenggarakan oleh Otoritas Jasa Keuangan • Sosialisasi Bulan Inklusi Keuangan 2025 diselenggarakan oleh Otoritas Jasa Keuangan • Sosialisasi Bulan Literasi Keuangan Tahun 2025 diselenggarakan oleh Otoritas Jasa Keuangan • Sharing Session "Suistainable Growth through Digitalization and Strong Governance" organized by Bank Victoria Internally • Webinar "Sustainability Accounting and Reporting in the Financial Services" organized by OJK Institute • Webinar on Raising Awareness of Criminal Risks related to Investment Fraud and Green Financial Crime, organized by Anti-Money Laundering and Counter-Terrorist Financing Division of Financial Services Authority • Workshop on Reporting Financial Literacy and Inclusion Activity Plans through SiPEDULI System, organized by Financial Services Authority • Innovative Credit Scoring in Improving Credit Quality and Inclusion and Developing Credit Scoring Model for Life Insurance's Consumers, organized by Financial Services Authority • Dissemination on Financial Inclusion Month 2025, organized by Financial Services Authority • Dissemination on Financial Literacy Month 2025, organized by Financial Services Authority

Pencapaian dan Biaya Pengembangan Kompetensi terkait Keuangan Berkelanjutan

Selama 3 (tiga) tahun terakhir, Perseroan secara berkelanjutan melaksanakan program pelatihan guna meningkatkan kompetensi di bidang keuangan berkelanjutan, dengan total peserta dan biaya yang telah dialokasikan sebagai berikut:

Achievements and Costs of Competency Development related to Sustainable Finance

Over the past 3 (three) years, the Company continuously implemented training programs to improve competency in sustainable finance, with the total number of participants and allocated costs as follows:

Uraian	Satuan Unit	2025	2024	2023	Description
Total Peserta	Orang People	**120**	39	43	Total Participants (People)
Biaya	Rp	**679,462,190**	46,446,548	34,742,047	Cost (Rp)

Penilaian Risiko atas Penerapan Keuangan Berkelanjutan [POJK E.3]

Bank telah mempunyai kebijakan manajemen risiko (*risk framework*) yang mengatur mengenai manajemen risiko iklim yang mencakup tata kelola risiko iklim, strategi penerapan manajemen risiko iklim, proses manajemen risiko iklim, jenis-jenis risiko iklim, dan stress test risiko iklim.

Pada tahun 2025, sesuai dengan Surat Otoritas Jasa Keuangan No. S-37/D.03/2024 perihal Pelaksanaan Tahap Lanjutan Pelaporan *Climate Risk Management and Scenario Analysis* (CRMS) oleh Seluruh Bank Umum di Tahun 2025, Bank Victoria untuk pertama kalinya menyampaikan Laporan *Climate Risk Stress Testing* (CRST) kepada Otoritas Jasa Keuangan melalui Surat No. 046/DIR-EKS/08/25 tanggal 27 Agustus 2025. Laporan tersebut mencakup analisis untuk sektor prioritas terbatas dengan minimal sampel analisis 50% dari outstanding kredit atau pembiayaan.

Penyampaian Laporan CRST merupakan bagian dari implementasi komitmen Bank dalam memperkuat praktik manajemen risiko serta mendukung penerapan keuangan berkelanjutan di sektor perbankan. Melalui pelaksanaan *stress test* risiko iklim ini, Bank melakukan identifikasi dan analisis awal terhadap potensi dampak perubahan iklim terhadap kinerja dan profil risiko Bank, baik yang berasal dari risiko fisik maupun risiko transisi.

Bank secara konsisten meninjau kembali strategi manajemen risiko agar selalu selaras dengan visi, misi, serta arah keberlanjutan yang telah ditetapkan. Proses evaluasi dilakukan dengan mengacu pada capaian RAKB tahun sebelumnya sebagai dasar penyusunan strategi yang lebih adaptif. Melalui pendekatan ini, Bank memastikan implementasi prinsip keuangan berkelanjutan berjalan efektif, efisien, serta mendukung transformasi digital dengan tetap menjunjung tinggi prinsip kehati-hatian. Untuk mengantisipasi potensi perbedaan antara target dan realisasi program dalam RAKB, Bank menyiapkan langkah mitigasi sebagai berikut:

1. Evaluasi terhadap program-program keuangan berkelanjutan yang telah berjalan.
2. Konsultasi dengan pihak eksternal untuk mengidentifikasi dan menyelesaikan kendala yang ada.
3. Pengkajian ulang indikator kinerja yang digunakan untuk tahun-tahun berikutnya, berdasarkan realisasi program keuangan berkelanjutan yang telah dilaksanakan.

Dengan upaya tersebut, Bank berupaya meningkatkan efektivitas program keberlanjutan secara berkesinambungan sehingga mampu mencapai sasaran strategis secara optimal.

Risk Assessment of Sustainable Finance Implementation [POJK E.3]

The Bank has a risk management policy (risk framework) that governs climate risk management, covering climate risk governance, climate risk management implementation strategies, climate risk management processes, types of climate risks, and climate risk stress testing.

In 2025, in accordance with Financial Services Authority Letter No. S-37/D.03/2024 on the Implementation of Advanced Phase of Climate Risk Management and Scenario Analysis (CRMS) Reporting by All Commercial Banks in 2025, Bank Victoria submitted its first Climate Risk Stress Testing (CRST) Report to the Financial Services Authority through Letter No. 046/DIR-EKS/08/25 dated 27 August 2025. The report included analysis for limited priority sectors with a minimum analysis sample of 50% of outstanding credit or financing.

The submission of CRST Report is part of the Bank's commitment to strengthening risk management practices and supporting the implementation of sustainable finance in banking sector. Through this climate risk stress testing, the Bank conducts an initial identification and analysis of the potential impacts of climate change on the Bank's performance and risk profile, both from physical risks and transition risks.

The Bank consistently reviews its risk management strategy to ensure it remains in line with the established vision, mission, and sustainability direction. Evaluation process is conducted by referring to the achievements of previous year's RAKB as the basis for developing a more adaptive strategy. Through this approach, the Bank ensures that the implementation of sustainable finance principles is effective, efficient, and supports digital transformation while upholding prudence principle. To anticipate potential discrepancies between targets and program realizations in RAKB, the Bank prepares the following mitigation measures:

1. Evaluation of sustainable finance programs that have been running.
2. Consultation with external parties to identify and resolve existing constraints.
3. Review of the performance indicators used in the following years, based on the realization of sustainable finance programs carried out.

With these efforts, the Bank strives to continuously improve the effectiveness of its sustainability program to optimally achieve strategic objectives.

Keberlanjutan Kinerja Ekonomi
Economic Performance Sustainability

Kinerja Operasional dan Keuangan
[POJK F.2] [POJK F.3]

Kinerja keuangan dan operasional memiliki peran penting dalam memastikan keberlangsungan usaha sekaligus mendukung pencapaian komitmen keberlanjutan Bank. Dengan landasan strategi yang terarah, disiplin dalam pengelolaan risiko, serta penerapan prinsip GCG, Bank berupaya menjaga pertumbuhan yang sehat dan berkelanjutan. Pencapaian ini tidak hanya mencerminkan efektivitas pengelolaan bisnis, tetapi juga menunjukkan kemampuan Bank dalam memberikan nilai tambah bagi pemangku kepentingan.

Informasi mengenai capaian kinerja keuangan dan operasional Bank selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

Operational and Financial Performance
[POJK F.2] [POJK F.3]

Financial and operational performance play a critical role in ensuring business continuity and supporting the achievement of the Bank's sustainability commitments. On the basis of well-directed strategy, disciplined risk management, and GCG principles implementation, the Bank strives to maintain healthy and sustainable growth. This achievement not only reflects the effectiveness of business management but also demonstrates the Bank's ability to provide added value to stakeholders.

Information on the Bank's financial and operational performance over the past 3 (three) years is presented as follows:

(dalam miliar Rupiah / in billion Rupiah)

Uraian	2025		2024	2023	Description
	Target	Realisasi Realization			
Kinerja Keuangan **Financial Performance**					
Total Aset	**34,198**	**36,202**	31,046	29,624	Total Assets
Total Liabilitas	**29,818**	**31,833**	27,113	25,799	Total Liabilities
Total Ekuitas	**4.380**	**4,369**	3,933	3,825	Total Equity
Pendapatan Bunga - Bersih	**557**	**559**	549	579	Interest Income - Net
Pendapatan (Beban) Operasional selain Bunga - Bersih	**(278)**	**(337)**	(256)	(405)	Operating Income (Expenses) other than Interest - Net
Laba Operasional	**279**	**222**	293	174	Profit from Operations
Laba Bersih Tahun Berjalan	**156**	**132**	118	102	Net Profit for the Year
Kinerja Operasional **Operational Performance**					
Total Produk Simpanan	**24,754**	**24,295**	23,332	22,429	Total Deposits Products
Total Produk Pinjaman	**21,538**	**22,380**	20,560	18,629	Total Loan Products
Total Pembiayaan Terhadap Kegiatan Usaha Berkelanjutan (dalam miliar)	**691**	**469**	601	504	Total Financing for Sustainable Business Activities (in billion)

Nilai Ekonomi Langsung yang Dihasilkan dan Didistribusikan

Pencapaian kinerja Bank pada tahun 2025 memberikan fondasi yang kuat bagi Bank untuk terus menyalurkan

Direct Economic Value Generated and Distributed

The Bank's performance achievements in 2025 provided a strong foundation for the Bank to continue distributing

manfaat ekonomi secara langsung kepada seluruh pemangku kepentingan. Melalui pengelolaan yang efisien dan strategis, Bank mampu menghasilkan nilai ekonomi yang signifikan sekaligus memastikan distribusinya tepat sasaran. Rincian nilai ekonomi langsung yang dihasilkan dan didistribusikan selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

direct economic benefits to all stakeholders. Through efficient and strategic management, the Bank is able to generate significant economic value while ensuring its distribution is on target. The details of direct economic value generated and distributed over the past 3 (three) years are presented as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	2025	2024	2023	Description
Nilai Ekonomi Langsung yang Dihasilkan **Direct Economic Values Generated**				
Penerimaan dari Pendapatan Bunga dan Syariah dan Komisi	**2,287,221**	2,141,595	1,866,455	Receipt from Interest and Sharia Income and Commissions
Penerimaan dari Operasional Lainnya	**430,725**	361,686	253,716	Receipt from Other Operating Income
Penerimaan dari Penjualan Agunan yang Diambil Alih	**58,013**	206,826	385,438	Receipt from Sale of Foreclosed Assets
Pendapatan Non-Operasional Lainnya	**-**	-	3,871	Other Non-Operating Income
Kenaikan dalam Kewajiban Operasi	**3,065,481**	335,541	3,256,073	Increase in Operating Liabilities
Hasil Penjualan Aset Tetap	**190**	28,782	45,396	Proceeds from Sale of Fixed Assets
Total	**5,841,631**	**3,074,430**	**5,464,055**	**Total**
Nilai Ekonomi yang Didistribusikan **Distributed Economic Value**				
Pembayaran Bunga dan Syariah	**1,731,407**	1,498,664	1,241,690	Payment of Interest and Sharia Expense
Pembayaran Beban Umum dan Administrasi	**195,015**	175,915	135,298	Payment of General and Administrative Expenses
Pembayaran Beban Tenaga Kerja	**189,135**	168,825	161,897	Payment of Personnel Expenses
Pembayaran Beban Operasional Lainnya	**147,332**	166,668	125,072	Payments of Other Operating Expenses
Pembayaran Pajak Penghasilan	**-**	-	16,049	Payment of Income Tax
Kenaikan dalam Aset Operasi	**1,820,966**	1,977,893	2,802,368	Increase in Operating Assets
Pembelian Aset Tetap	**16,229**	19,802	16,196	Purchase of Fixed Assets
Pembelian Aset Tak Berwujud	**7,944**	5,893	7,289	Purchase of Intangible Assets
Pembayaran Sewa	**15,949**	12,635	10,757	Payment of Lease
Biaya Investasi Sosial	**439**	1,209	180	Social Investment Cost
Total	**4,124,415**	**4,027,504**	**4,516,796**	**Total**
Nilai Ekonomi yang Ditahan	**1,717,216**	**953,074**	**947,259**	**Economic Value Retained**

Mendukung Pertumbuhan Perekonomian Indonesia

Bank senantiasa berperan aktif dalam mendorong pertumbuhan ekonomi nasional melalui pemberian kredit kepada pelaku usaha di berbagai sektor. Penyaluran pembiayaan ini tidak hanya bertujuan untuk mendukung pengembangan bisnis nasabah, tetapi juga memperkuat kontribusi Bank terhadap pertumbuhan ekonomi berkelanjutan di Indonesia. Rincian capaian kinerja pembiayaan Bank selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

Supporting Indonesia's Economic Growth

The Bank constantly plays an active role in promoting national economic growth by providing lenduing to businesses owners in various sectors. This financing distribution not only aims to support customer business development but also strengthen the Bank's contribution to sustainable economic growth in Indonesia. Details of the Bank's financing performance over the past 3 (three) years are presented as follows:

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

Uraian Description	2025		2024		2023	
	Total	Komposisi Composition (%)	Total	Komposisi Composition (%)	Total	Komposisi Composition (%)
Lembaga Pembiayaan Financing Institution	**5,111,935**	**22.84**	5,577,685	27.13	5,563,012	29.86
Perdagangan, Restoran, dan Hotel Trading, Restaurant, and Hotel	**4,572,237**	**20.43**	4,092,649	19.91	3,574,240	19.19
Industri Industry	**3,817,154**	**17.06**	3,015,057	14.66	2,186,357	11.74
Real Estat Real Estate	**3,061,966**	**13.68**	2,476,933	12.05	2,533,799	13.60
Konstruksi Construction	**1,110,646**	**4.96**	1,100,320	5.35	737,807	3.96
Jasa-Jasa Sosial/Masyarakat Social/Community Services	**515,917**	**2.31**	417,107	2.03	349,351	1.88
Lain-Lain Others	**4,190,311**	**18.72**	3,880,110	18.87	3,684,177	19.78
Total	**22,380,166**	**100.00**	**20,559,860**	**100.00**	**18,628,743**	**100.00**

Selain mendorong pertumbuhan ekonomi secara umum melalui penyaluran kredit, Bank Victoria juga fokus mendukung pengembangan Usaha Mikro, Kecil, dan Menengah (UMKM) sebagai motor penggerak ekonomi lokal. Pembiayaan yang diberikan bertujuan memperkuat kapasitas usaha, meningkatkan produktivitas, serta membuka peluang lapangan kerja. Rincian capaian pembiayaan Bank ke sektor UMKM selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

In addition to promoting general economic growth through lending, Bank Victoria also focuses on supporting Micro, Small, and Medium Enterprises (MSMEs) development of as the driving force of local economy. The financing provided aims to strengthen business capacity, increase productivity, and create employment opportunities. Details of the Bank's financing achievements to MSME sector over the past 3 (three) years are presented as follows:

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

Uraian Description	2025		2024		2023	
	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)	Jumlah Total	Komposisi Composition (%)
Usaha Mikro Micro Business	-	-	-	-	-	-
Usaha Kecil Small Business	**60,555**	**0.02**	13,778	0.43	16,499	0.54
Usaha Menengah Medium Business	**3,308,176**	**0.98**	3,157,840	99.57	3,037,478	99.46
Total	**3,368,731**	**100.00**	**3,171,618**	**100.00**	**3,053,977**	**100.00**

Pembiayaan terhadap Kegiatan Usaha Berkelanjutan [POJK F.3]

Sebagai bagian dari komitmen terhadap keuangan berkelanjutan, Bank Victoria menyalurkan pembiayaan kepada sektor-sektor yang memenuhi kriteria kegiatan usaha berkelanjutan. Inisiatif ini bertujuan mendorong praktik bisnis yang ramah lingkungan, efisien secara

Financing for Sustainable Business Activities [POJK F.3]

As part of the commitment to sustainable finance, Bank Victoria provides financing to sectors that meet the criteria for sustainable business activities. This initiative aims to encourage environmentally friendly, socially efficient, and economically ethical business practices. Details of

sosial, serta beretika secara ekonomi. Rincian kinerja pembiayaan berkelanjutan yang telah disalurkan Bank selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

the Bank's sustainable financing performance over the past 3 (three) years are presented as follows:

(dalam juta Rupiah / in million Rupiah)

Uraian	Penyaluran Kredit Loans			Description
	2025	2024	2023	
Pencegahan dan Pengendalian Polusi	**99,465**	73,773	219,043	Pollution Prevention and Control
Pengelolaan Sumber Daya Alam Hayati dan Penggunaan Lahan yang Berkelanjutan	**296,740**	308,076	173,182	Management of Biodiversity Resources and Sustainable Land Use
Kegiatan Usaha dan/atau Kegiatan Lain yang Berwawasan Lingkungan Lainnya	**163,435**	205,667	88,158	Eco-Friendly Business Activities and/or Other Activities
Energi Terbarukan	**89,899**	15,482	-	Renewable Energy
Kegiatan UMKM	**3,368,731**	3,167,772	3,053,977	MSME Activities
Total	**4,018,270**	**3,770,770**	**3,534,360**	**Total**

Literasi dan Inklusi Keuangan

Bank Victoria menyelenggarakan program literasi dan inklusi keuangan sebagai upaya memperkuat pemahaman masyarakat Indonesia dalam mengelola keuangan secara efektif. Program ini dirancang berdasarkan kebijakan yang tertuang dalam Surat Keputusan Direksi No. 004/SK-DIR/10/24 dan dikoordinasikan oleh Divisi *Branch Banking Network* bersama divisi terkait lainnya. Pelaksanaan program dilakukan secara terstruktur melalui berbagai tahapan berikut:

Financial Literacy and Inclusion

Bank Victoria holds financial literacy and inclusion programs to strengthen Indonesian public's understanding of effective financial management. This program is designed based on the policy outlined in the Board of Directors' Decision Letter No. 004/SK-DIR/10/24 and coordinated by the Branch Banking Network Division and other relevant divisions. The program is carried out in a structured manner through the following stages:

Perencanaan dan Persiapan **Planning and Preparation**	Materi edukasi disampaikan oleh para profesional yang telah mendapatkan pelatihan khusus dan memiliki pemahaman mendalam tentang program yang diajarkan. Untuk meningkatkan pemahaman peserta, Bank menyediakan materi dengan dukungan media audio-visual berkualitas tinggi. Sebagai tambahan, beberapa lagu anak bertema "Ayo Menabung" juga dipersiapkan untuk menarik minat siswa dalam mengikuti kegiatan edukasi. Apabila program dilaksanakan secara virtual, Bank juga menyediakan tautan Zoom sebagai sarana pelaksanaan edukasi dan literasi keuangan.	Educational materials are delivered by professionals who have received special training and have a deep understanding of the programs taught. To enhance participants' understanding, the Bank provides materials supported by high-quality audio-visual media. In addition, several children songs with the theme "*Ayo Menabung*" (Let's Save Money) are also prepared to attract students' interest in participating in educational activities. When the program is held virtually, the Bank also provides links for Zoom meeting as a platform for implementing financial education and literacy.
Pencapaian Tujuan yang Telah Ditetapkan **Achievement of the Predetermined Goals**	Pelaksanaan program dirancang sesuai dengan lokasi kantor cabang utama dan cabang pembantu, dengan mempertimbangkan kemudahan akses dan koordinasi antar pihak terkait. Program ini bertujuan menjadi sarana edukasi bagi masyarakat, terutama ibu-ibu, dalam meningkatkan kemampuan merencanakan keuangan rumah tangga secara lebih efektif. Sementara itu, untuk siswa SD, SMP, dan SMA, program ini diharapkan dapat menambah wawasan tentang pentingnya menabung sejak usia dini dan manfaatnya di masa depan.	The program implementation is designed according to the location of main branch and sub-branch offices, by considering accessibility and coordination between related parties. This program aims to be a means of education for the community, particularly housewives, in improving their ability to plan household finances more effectively. Meanwhile, for elementary, junior high, and high school students, this program is expected to increase their insight into the importance of saving money early and its benefits in the future.

Pelaksanaan Strategi dan Kebijakan **Implementation of Strategies and Policies**	Program literasi keuangan dilaksanakan secara berkala mengikuti tahapan implementasi berikut: • Sebelum program dimulai, peserta akan mengikuti *pre-test* untuk mengukur tingkat pemahaman awal peserta. Tes ini terdiri dari 17 pertanyaan yang berhubungan dengan topik yang akan dibahas selama program; • Setelah hasil *pre-test* dianalisis, edukasi akan diberikan oleh tim dari Bank Victoria melalui metode interaktif yang mendorong partisipasi aktif peserta, memungkinkan peserta bertanya dan menyampaikan pendapat secara langsung; dan • Setelah program selesai, peserta akan menjalani *post-test* dengan pertanyaan serupa dari *pre-test* untuk mengukur sejauh mana pemahaman peserta telah berkembang serta mengevaluasi keberhasilan program. *Pre-test* dan *post-test* juga dapat dilaksanakan secara virtual melalui aplikasi khusus yang terpisah dari Zoom yang digunakan selama sesi edukasi.	The financial literacy program is implemented periodically in accordance with the following implementation stages: • Before the program begins, participants will take a pre-test to measure their initial level of understanding. This test consists of 17 questions related to the topics to be discussed during the program; • After the pre-test results are analyzed, education will be provided by Bank Victoria team through an interactive method that encourages active participation of participants, allowing them to directly raise questions and express opinions; and • After the program is completed, participants will undergo a post-test with similar questions from the pre-test to measure the extent to which participants' understanding has developed and to evaluate the success of the program. Pre-test and post-test can also be conducted virtually through separate dedicated application from Zoom that is used during the education sessions.
Evaluasi Kendala yang Dihadapi dan Upaya-Upaya Pemecahan Masalah **Evaluation of Obstacles Encountered and Problem-Solving Measures**	Bank menghadapi sejumlah tantangan dalam mengajak peserta untuk mengikuti program, antara lain: • Waktu yang terbatas menyebabkan pemahaman mengenai pentingnya perencanaan keuangan rumah tangga kurang maksimal; • Beberapa sekolah swasta, yang menjadi target program, memiliki kebijakan internal yang membatasi pelaksanaan program di lingkungan sekolah tersebut; • Terbatasnya akses internet yang memengaruhi partisipasi siswa; dan • Tidak semua ibu rumah tangga memiliki perangkat atau pemahaman yang memadai terkait penggunaan aplikasi Zoom saat program dilakukan secara virtual. Untuk mengatasi hambatan-hambatan tersebut, Bank mengambil langkah-langkah proaktif, seperti berkoordinasi dengan para pemimpin kelompok peserta edukasi dan bekerja sama dengan pihak-pihak terkait, sehingga program dapat terlaksana dengan lancar dan mencapai target yang ditetapkan.	The Bank encountered several challenges in inviting participants to participate in the program, including: • Limited time that results in less than optimal understanding of the importance of household financial planning; • Several private schools, which are the program targets, have internal policies that limit the program implementation within the school; • Limited internet access which affects student participation; and • Not all housewives have devices or adequate understanding on how to use Zoom application when the program is held virtually. To overcome these obstacles, the Bank took proactive steps, such as coordinating with the leaders of education participant groups and working together with related parties, so that the program could be held smoothly and achieve the targets set.

Pelaksanaan Program Literasi dan Inklusi Keuangan

Pada tahun 2025, pelaksanaan program literasi dan inklusi keuangan Bank diuraikan sebagai berikut:

Implementation of Financial Literacy and Inclusion Program

In 2025, the implementation of the Bank's financial literacy and inclusion program was described as follows:

Kegiatan edukasi bertema "Sosialisasi SBR014" diselenggarakan di Le Victoria Prestige, Coffee & Brasserie, diikuti oleh 30 (tiga puluh) peserta. Program ini dirancang untuk memberikan pemahaman yang komprehensif kepada peserta terkait obligasi SBR014.

Education activity with the theme "Dissemination of SBR014" was held at Le Victoria Prestige, Coffee & Brasserie, attended by 30 (thirty) participants. This program was designed to provide participants with a comprehensive understanding of SBR014 bond.

Kegiatan literasi bertema "Ayo ke Bank" diselenggarakan di SDIT 1 Syawal, Tambun Bekasi, diikuti oleh 100 peserta. Kegiatan ini bertujuan untuk mengajak para siswa dan siswi mengenal dunia perbankan sejak dini serta dapat menumbuhkan kebiasaan positif dalam pengelolaan keuangan di masa depan.

Lliteracy activity with the theme "Let's Go to the Bank" was held at SDIT 1 Syawal, Tambun Bekasi, with 100 participants. This activity was aimed to introduce students to the world of banking early on and foster positive habits in managing finances in the future.

Kegiatan Literasi Keuangan Keluarga bersama Kader PKK Kelurahan Pondok Cabe Udik dengan peserta 50 orang. Kegiatan ini bertujuan untuk memberikan pemahaman penting tentang pengelolaan keuangan keluarga yang bijak agar siap menghadapi kebutuhan di masa depan.

Family Financial Literacy Activity with PKK Cadres of Pondok Cabe Udik Village, with 50 participants. This activity was aimed to provide essential insights into wise family financial management to prepare them for future needs.

Keberlanjutan Kinerja Sosial
Social Performance Sustainability

Komitmen Pelayanan Terbaik bagi Nasabah [POJK F.17]

Bank Victoria menegaskan komitmen untuk memberikan pelayanan prima sesuai dengan Surat Keputusan Direksi No. 011/SK-DIR/12/25 tentang Kebijakan Pelindungan Konsumen. Dalam penerapannya, Bank menjunjung tinggi prinsip kesetaraan serta penghormatan terhadap hak asasi manusia bagi seluruh nasabah, baik individu maupun organisasi, mencakup segmen korporasi, komersial, maupun perorangan. Untuk menjaga dan meningkatkan kualitas layanan, Bank secara konsisten menyelenggarakan program pelatihan tahunan yang meliputi pengetahuan produk, keamanan siber, etika komunikasi, serta materi relevan lainnya, sehingga layanan senantiasa sesuai standar terbaik dan selaras dengan perkembangan perilaku nasabah.

Manfaat dari Produk dan Layanan yang Diberikan [POJK F.28]

Produk dan layanan Bank Victoria memberikan dampak positif yang bagi nasabah maupun perekonomian secara keseluruhan. Melalui berbagai instrumen keuangan seperti simpanan, pinjaman, layanan investasi, dan bank devisa, Bank mendukung kelancaran transaksi harian, mendorong pertumbuhan usaha, memperluas akses permodalan, serta membantu perencanaan keuangan jangka panjang. Dengan demikian, Bank berperan aktif dalam memperkuat stabilitas ekonomi dan meningkatkan kesejahteraan masyarakat.

Di sisi lain, Bank menyadari adanya potensi dampak negatif dari aktivitas pembiayaan. Dari aspek sosial, risiko yang dapat muncul meliputi pelanggaran hak asasi manusia, seperti pekerja anak, upah di bawah standar minimum, dan kondisi kerja yang tidak layak pada sektor padat karya. Sementara itu, dari aspek lingkungan, potensi dampak yang teridentifikasi antara lain deforestasi, kebakaran hutan dan lahan, serta kontribusi terhadap perubahan iklim, khususnya pada industri berbasis lahan.

Untuk memitigasi risiko tersebut, Bank Victoria menerapkan persyaratan kredit yang ketat, termasuk kewajiban kepatuhan terhadap regulasi ketenagakerjaan dan pemeriksaan lapangan secara berkala. Selain itu, Bank mewajibkan dokumen Analisis Mengenai Dampak Lingkungan (AMDAL) bagi debitur dengan pengelolaan lahan di atas 25 hektare sebagai salah satu syarat pengajuan kredit. Melalui kebijakan ini, Bank memastikan bahwa setiap pembiayaan yang diberikan tidak hanya mendukung pertumbuhan ekonomi, tetapi juga sejalan dengan prinsip keberlanjutan sosial dan lingkungan.

Commitment to the Best Service for Customers [POJK F.17]

Bank Victoria affirms its commitment to providing excellent service in accordance with Board of Directors' Decision Letter No. 011/SK-DIR/12/25 on Consumer Protection Policy. In its implementation, the Bank upholds the principles of equality and respect for human rights for all customers, both individuals and organizations, across corporate, commercial, and personal segments. To maintain and improve service quality, the Bank consistently holds annual training programs covering product knowledge, cybersecurity, communication ethics, and other relevant materials, ensuring that services consistently meet the highest standards and are in line with the evolving customer behavior.

Benefits of Products and Services Provided [POJK F.28]

Bank Victoria's products and services have a positive impact on both customers and the economy as a whole. Through various financial instruments such as savings, loans, investment services, and foreign exchange banking services, the Bank supports the smooth running of day-to-day transactions, encourages business growth, expands access to capital, and assists with long-term financial planning. Thus, the Bank plays an active role in strengthening economic stability and improving public welfare.

On the other hand, the Bank recognizes the potential negative impacts of its financing activities. From social perspective, risks that may arise include human rights violations, such as child labor, wage below the minimum standard, and unsuitable working conditions in labor-intensive sectors. Meanwhile, from environmental perspective, the potential impacts identified include deforestation, forest and land fires, and contributions to climate change, particularly in land-based industries.

To mitigate such risks, Bank Victoria implements strict loan requirements, including mandatory compliance with labor regulations and regular field inspections. Furthermore, the Bank requires an Environmental Impact Analysis (AMDAL) document for debtor managing land areas exceeding 25 hectares as a prerequisite for applying loan. Through this policy, the Bank ensures that all financing provided not only supports economic growth but is also in line with social and environmental sustainability principles.

Inovasi dan Pengembangan Produk dan Jasa [POJK F.26]

Sebagai bagian dari strategi pertumbuhan berkelanjutan, Bank secara proaktif merancang dan mengimplementasikan inisiatif pengembangan produk serta layanan yang selaras dengan tren pasar dan ekspektasi nasabah. Sepanjang tahun 2025, berbagai program telah dijalankan guna memperkuat proposisi nilai Bank, memperluas jangkauan layanan, serta menghadirkan solusi finansial yang lebih adaptif dan inovatif. Rincian program-program tersebut disampaikan sebagai berikut:

1. Tabungan Victoria Run 2025.
2. VIP Safe Digital, yaitu simpanan yang pembukaan rekeningnya melalui *Victoria Mobile*.
3. Deposito *online*, yaitu simpanan dalam Rupiah maupun mata uang asing yang pencairannya hanya dapat dilakukan pada jangka waktu tertentu dan syarat-syarat tertentu dengan proses pembukaan rekening dapat dilakukan melalui layanan perbankan elektronik (*e-channel*).

Program Peningkatan Kualitas Layanan

Dalam upaya meningkatkan kepuasan dan pengalaman nasabah, Bank terus menginisiasi berbagai program strategis yang difokuskan pada optimalisasi kualitas layanan. Program-program tersebut dirancang untuk menjawab kebutuhan nasabah yang semakin beragam serta memperkuat keunggulan kompetitif Bank dalam industri perbankan. Adapun sejumlah inisiatif yang telah dijalankan dijabarkan sebagai berikut:

1. Pembukaan rekening melalui *mobile banking* (*on boarding*).
2. Penempatan deposito *online*.
3. Penarikan tunai tanpa kartu (*cardless card withdrawal*).
4. QRIS *payment*.
5. Transaksi (pembayaran, pembelian, transfer) melalui *mobile banking*.

Keamanan Simpanan dan Kerahasiaan Data Nasabah

Bank Victoria berupaya menjaga kepercayaan nasabah melalui penerapan standar keamanan yang ketat dalam setiap transaksi. Sebagai peserta Lembaga Penjamin Simpanan (LPS), Bank memastikan dana nasabah terlindungi sesuai ketentuan yang berlaku, sehingga memberikan kepastian dan rasa aman dalam menyimpan dana. Di samping itu, Bank mengelola data nasabah dengan penuh kehati-hatian dan menjunjung tinggi prinsip kerahasiaan, dengan tetap mematuhi seluruh regulasi yang mengatur perlindungan data dan keamanan simpanan yang meliputi:

1. Undang-Undang No. 7 Tahun 1992 tentang Perbankan, dan perubahannya dalam Undang-Undang No. 10 Tahun 1998.
2. Undang-Undang Republik Indonesia No. 27 Tahun 2022 tentang Perlindungan Data Pribadi.

Product and Service Innovation and Development [POJK F.26]

As part of sustainable growth strategy, the Bank proactively designs and implements product and service development initiatives in line with market trends and customer expectations. Throughout 2025, various programs were carried out to strengthen the Bank's value proposition, expand its service reach, and provide more adaptive and innovative financial solutions. The details of such programs are as follows:

1. Victoria Run 2025 Savings.
2. VIP Safe Digital, a savings account opened through Victoria Mobile.
3. Online Time Deposits, a savings account in Rupiah or foreign currencies that can only be withdrawn at a specific period and under certain conditions. The account opening process can be done through electronic banking services (e-channel).

Services Quality Improvement Program

To improve customer satisfaction and experience, the Bank continues to initiate various strategic programs focusing on optimizing service quality. These programs are designed to address the increasingly diverse needs of customers and strengthen the Bank's competitive advantage in banking industry. Some of the initiatives carried out are as follows:

1. Account opening via mobile banking (on boarding).
2. Online time deposits placement.
3. Cardless cash withdrawal.
4. QRIS payment.
5. Transactions (payment, purchase, transfer) via mobile banking.

Customer Deposit Security and Data Confidentiality

Bank Victoria strives to maintain customer trust by implementing strict security standards in every transaction. As a member of the Deposit Insurance Corporation (LPS), the Bank ensures that customer funds are protected in accordance with applicable regulations, thereby providing certainty and a sense of security when saving funds. Furthermore, the Bank manages customer data with great care and upholds confidentiality principle, while adhering to all regulations governing data protection and deposit security, including:

1. Law No. 7 of 1992 on Banking, and its amendments in Law No. 10 of 1998.
2. Law of the Republic of Indonesia No. 27 of 2022 on Personal Data Protection.

3. Undang-Undang No. 4 Tahun 2023 tentang Pengembangan dan Penguatan Sektor Keuangan.
4. Peraturan Otoritas Jasa Keuangan No. 44 Tahun 2024 tentang Rahasia Bank.
5. Peraturan Bank Indonesia No. 3 Tahun 2023 tentang Perlindungan Konsumen Bank Indonesia.
6. Peraturan Otoritas Jasa Keuangan No. 22 tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.

3. Law No. 4 of 2023 on Financial Sector Development and Strengthening.
4. Financial Services Authority Regulation No. 44 of 2024 on Bank Secrecy.
5. Bank Indonesia Regulation No. 3 of 2023 on Consumer Protection of Bank Indonesia.
6. Financial Services Authority Regulation No. 22 of 2023 on Consumer and Community Protection in the Financial Services Sector.

Bank juga berkomitmen menjaga keamanan simpanan serta kerahasiaan data nasabah melalui penerapan pengendalian TI yang memadai dan berlapis. Pengelolaan keamanan TI dilakukan secara terstruktur dengan mengacu pada ketentuan regulator yang berlaku, termasuk prinsip kehati-hatian dan perlindungan data nasabah, guna mencegah akses tidak sah, kebocoran informasi, serta gangguan terhadap sistem perbankan. Selain itu, Bank juga memberikan pelatihan terkait keamanan data dan siber kepada karyawan. Pada tahun 2025, Perseroan menyelenggarakan 2 (dua) program pelatihan yang mencakup pelatihan strategi dan implementasi pelindungan konsumen dan data pribadi, serta pelatihan cyber security. Total partisipasi dalam kedua program pelatihan tersebut tercatat sebanyak 906 peserta. Jumlah tersebut merupakan akumulasi keikutsertaan karyawan pada 2 (dua) program pelatihan, sehingga sebagian karyawan tercatat mengikuti lebih dari 1 (satu) pelatihan.

The Bank is also committed to maintaining deposits security and customer data confidentiality through the implementation of adequate and multi-layered IT controls. IT security management is carried out in a structured manner, adhering to applicable regulatory requirements, including prudence principle and customer data protection, to prevent unauthorized access, information leaks, and disruptions to the banking system. Furthermore, the Bank provides training related to data and cybersecurity to employees. In 2025, the Company held 2 (two) training programs, covering strategy and implementation training on consumer and personal data protection, as well as cybersecurity training. A total of 906 participants participated in the two training programs. This number represented the cumulative participation of employees in the 2 (two) training programs, resulting in some employees participating in more than 1 (one) training program.

Sebagai wujud tanggung jawab dalam melindungi nasabah, Bank Victoria juga tidak hanya menjaga keamanan sistem internal, tetapi juga mendorong partisipasi aktif nasabah dalam melindungi data pribadi dan simpanannya. Bank senantiasa menyampaikan edukasi serta imbauan preventif berikut agar nasabah dapat mengantisipasi potensi risiko keamanan secara mandiri:

As the manifestation of responsibility to protect customers, Bank Victoria not only maintains internal system security but also encourages active customer participation in protecting their personal data and savings. The Bank consistently provides the following education and preventative advice so that customers can independently anticipate potential security risks:

Keamanan Bertransaksi Transaction Security	
Simpan Kartu ATM Keep the ATM Card	Kartu ATM adalah akses termudah menuju dana yang ada di rekening anda, untuk itu pastikan kartu ATM anda tersimpan dengan baik dan tidak dipinjamkan kepada orang lain. ATM card is the easiest access to your account, so make sure your ATM card is kept properly and do not lend it to other people.
PIN dan *Password* Milik Pribadi PIN and Password are Personal	Jaga kerahasiaan PIN dan *password* anda, jangan membiarkan informasi ini diketahui oleh orang lain. Keep the confidentiality of your PIN and password, do not let others know this information.
Tidak Menandatangani Dokumen Kosong Not Signing Blank Documents	Dalam kondisi apapun, jangan pernah menandatangani formulir/slip kosong. Pastikan seluruh informasi di formulir/slip kosong sudah benar dan sesuai dengan kebutuhan anda. Under no circumstances should you sign a blank form/slip. Make sure that all information on the blank form/slip is correct and fit to your needs.
Gunakan *Internet Banking* dan *Mobile Banking* Use Internet Banking and Mobile Banking	Aktifkan fasilitas *Internet Banking* dan *Mobile Banking* (IBMB) anda, selain memudahkan transaksi perbankan, dengan IBMB anda dapat selalu memonitor rekening secara tepat waktu. Activate your Internet Banking and Mobile Banking (IBMB) facilities. In addition to facilitating banking transactions, IBMB can always help monitor your accounts in a timely manner.

Keamanan Bertransaksi Transaction Security	
Rutin Cek Saldo	Lakukan pengecekan saldo anda secara berkala. Jika anda menemukan transaksi mencurigakan segera hubungi *Call Center* untuk meminta penjelasan. Cek saldo dapat dilakukan melalui layanan *Call Center,* IBMB, ATM, dan cetak buku tabungan di kantor cabang terdekat.
Regularly Check Your Balance	Check your balance regularly. If you find a suspicious transaction, immediately contact the Call Center to ask for explanation. Balance checking can be done through Call Center, IBMB, ATM services, and print the bank passbook at the nearest branch office.

Sepanjang tahun 2025, Bank Victoria berhasil menjaga kepercayaan nasabah dengan tidak adanya laporan maupun pengaduan terkait pelanggaran privasi.

Program Keterikatan Nasabah

Untuk mempererat hubungan dengan nasabah, Bank Victoria secara konsisten menyelenggarakan berbagai program yang dirancang guna meningkatkan kepuasan dan loyalitas. Beberapa inisiatif yang dijalankan, antara lain program tabungan berhadiah langsung sebagai bentuk apresiasi atas kepercayaan nasabah, serta program loyalitas berupa pemberian hadiah kue ulang tahun bagi nasabah terpilih. Selain itu, Bank secara rutin mengadakan *customer gathering* yang menghadirkan jajaran Direksi, memberikan kesempatan bagi nasabah untuk berinteraksi secara langsung, menyampaikan masukan, dan memperkuat rasa kebersamaan. Melalui program-program tersebut, Bank berupaya menghadirkan layanan yang tidak hanya bernilai fungsional, tetapi juga membangun ikatan emosional dengan nasabah.

Evaluasi Produk dan Jasa

[POJK F.27] [POJK F.29]

Unit *Wealth and Liabilities Product Conventional and Digital Development* berperan strategis dalam pengelolaan serta pengembangan produk dan layanan keuangan Bank. Setiap produk yang dirancang senantiasa melalui proses evaluasi menyeluruh, mulai dari penilaian risiko oleh Satuan Kerja Manajemen Risiko, uji kepatuhan oleh Divisi Kepatuhan, hingga persetujuan regulator seperti Otoritas Jasa Keuangan dan Bank Indonesia. Seluruh tahapan ini berada dalam pengawasan Direksi untuk memastikan kesesuaian dengan prinsip kehati-hatian dan peraturan yang berlaku. Sepanjang tahun 2025, 100% produk dan layanan Bank telah melalui proses evaluasi tanpa adanya penangguhan maupun penarikan kembali, mencerminkan komitmen Bank dalam menghadirkan solusi keuangan yang aman, sesuai regulasi, dan berkelanjutan.

Survei Kepuasan Nasabah [POJK F.30]

Sebagai bagian dari upaya peningkatan mutu layanan, Bank Victoria secara rutin melaksanakan survei kepuasan nasabah. Survei ini dilakukan secara berkala di setiap kantor cabang, kemudian dihimpun dan dianalisis di kantor pusat untuk mendapatkan gambaran menyeluruh mengenai kualitas produk dan layanan. Hasil pengukuran selama 3 (tiga) tahun terakhir ditunjukkan sebagai berikut:

Throughout 2025, Bank Victoria managed to maintain customer trust with no reports or complaints related to privacy breaches.

Customer Engagement Program

To strengthen relationships with customers, Bank Victoria consistently implements various programs designed to increase satisfaction and loyalty. Some of the initiatives carried out include savings program with instant prizes as a token of appreciation for customer trust, and loyalty program that includes birthday cakes for selected customers. Furthermore, the Bank periodically holds customer gatherings featuring the Board of Directors, providing opportunities for customers to interact directly, provide feedback, and strengthen a sense of solidarity. Through such programs, the Bank strives to provide services that are not only functional but also build emotional bonds with customers.

Evaluation of Products and Services

[POJK F.27] [POJK F.29]

The Wealth and Liabilities Product Conventional and Digital Development Unit play strategic roles in managing and developing the Bank's financial products and services. Each product designed undergoes a thorough evaluation process, from risk assessment by the Risk Management Work Unit, compliance test by Compliance Division, to regulatory approval from regulators such as Financial Services Authority and Bank Indonesia. All these stages are under the supervision of the Board of Directors to ensure compliance with prudential principles and applicable regulations. Throughout 2025, 100% of the Bank's products and services underwent evaluation process without any suspensions or withdrawals, thus reflecting the Bank's commitment to providing safe, regulatory-compliant, and sustainable financial solutions.

Customer Satisfaction Survey [POJK F.30]

As an effort to improve service quality, Bank Victoria regularly conducts customer satisfaction survey. This survey is conducted periodically at each branch office, then compiled and analyzed at head office to obtain a comprehensive overview of product and service quality. The measurement results for the past 3 (three) years are shown below:

Indikator	2025	2024	2023	Indicator
Teller (Grooming, Behavior, Skill, and Product Knowledge)	**90**	92	90	Teller (Grooming, Behavior, Skill, and Product Knowledge)
Customer Service (Behavior, Skill, Product Knowledge, and Cross Selling)	**90**	92	90	Customer Service (Behavior, Skill, Product Knowledge, and Cross Selling)
Security (Grooming, Behavior, Skill, and Product Knowledge)	**85**	92	90	Security (Grooming, Behavior, Skill, and Product Knowledge)
Eksterior dan Interior Kantor Cabang	**85**	80	75	Exterior and Interior of Branch Offices
Rata-Rata Hasil	**87.50**	**89.00**	**86.25**	**Average Results**
Kategori	**Baik** Good	**Baik** Good	**Baik** Good	**Category**

Sarana Pengaduan Nasabah

Bank Victoria menyediakan berbagai kanal pengaduan yang mudah diakses untuk memastikan setiap nasabah dapat menyampaikan keluhan terkait produk maupun layanan dengan cepat dan praktis. Melalui *Call Center* (1500977) 24 jam, layanan email (customercare@victoriabank.co.id), *Customer Service* di seluruh kantor cabang, hingga aplikasi *mobile* Bank Victoria, nasabah diberikan fleksibilitas dalam memilih sarana penyampaian pengaduan. Seluruh laporan ditangani dengan memerhatikan validitas, kecepatan, serta ketepatan penyelesaian sesuai Standar *Service Level Agreement* (SLA) yang berlaku. Sebagai wujud transparansi, Bank juga secara berkala menyampaikan data mengenai jumlah pengaduan yang diterima dan ditindaklanjuti, sehingga mencerminkan komitmen dalam menjaga kualitas layanan dan meningkatkan kepercayaan nasabah.

Bank mengelola penanganan pengaduan nasabah melalui 2 (dua) mekanisme, yaitu pengaduan lisan dan pengaduan tertulis. Untuk pengaduan lisan, Perseroan menyampaikan tanggapan dan/atau penyelesaian pada saat yang sama sejak pengaduan diterima. Dalam hal pengaduan belum dapat diselesaikan secara langsung, Perseroan akan menindaklanjuti pengaduan tersebut dan menyelesaikannya paling lambat dalam waktu 5 (lima) hari kerja.

Sementara itu, untuk pengaduan tertulis, Perseroan melakukan proses penanganan yang lebih komprehensif, dimulai dari penerimaan dan dokumentasi pengaduan, serta penyampaian pemberitahuan jangka waktu penyelesaian kepada nasabah. Penyelesaian pengaduan tertulis dilakukan dalam jangka waktu maksimal 10 (sepuluh) hari kerja sejak dokumen pengaduan diterima secara lengkap.

Dalam kondisi tertentu, jangka waktu penyelesaian pengaduan tertulis dapat diperpanjang sesuai ketentuan yang berlaku, khususnya apabila terdapat kendala komunikasi dengan nasabah, diperlukan penelitian lebih lanjut atas dokumen atau bukti pendukung, atau apabila pengaduan melibatkan pihak ketiga seperti *merchant, switching,* maupun bank lain. Setelah proses penanganan

Customer Complaint Channel

Bank Victoria provides various easily accessible complaint channels to ensure every customer can quickly and conveniently submit complaints related to products and services. Through the 24-hour Call Center (1500977), email service (customercare@victoriabank.co.id), Customer Service at all branch offices, and Bank Victoria mobile app, customers are given flexibility in choosing the means of submitting complaints. All reports are handled with attention to validity, speed, and accuracy of resolution in accordance with the applicable Service Level Agreement (SLA) Standards. As a form of transparency, the Bank also periodically provides data on the number of complaints received and followed up, thus reflecting its commitment to maintaining service quality and enhancing customer trust.

The Bank manages customer complaint handling through 2 (two) mechanisms, namely verbal complaints and written complaints. For verbal complaints, the Company provides a response and/or resolution immediately upon receipt of the complaint. In the event the complaint cannot be resolved immediately, the Company will follow up on the complaint and resolve it within a maximum of 5 (five) working days.

Meanwhile, for written complaints, the Company implements a more comprehensive handling process, starting with the receipt and documentation of the complaint, and notifying the customer of the resolution period. Written complaints are resolved within a maximum of 10 (ten) working days upon receipt of the complete complaint documents.

Under certain circumstances, the resolution period for written complaints may be extended in accordance with applicable regulations, particularly if there are communication difficulties with the customer, further research is required on supporting documents or evidence, or if the complaint involves a third party such as a merchant, switching company, or another bank. Once the handling process is complete,

selesai, Perseroan menyampaikan tanggapan akhir kepada nasabah sebagai bentuk penyelesaian pengaduan.

Adapun informasi jumlah pengaduan nasabah yang diterima Bank selama 3 (tiga) tahun terakhir sebagai berikut:

the Company will provide a final response to the customer as a form of complaint resolution.

Information on the number of customer complaints received by the Bank over the past 3 (three) years is as follows:

Jenis Pengaduan Type of Complaint	2025					2024			2023		
	Total Keluhan Total Complaint	Selesai Settled		Sedang Ditindaklanjuti On Follow-Up		Total Keluhan Total Complaint	Selesai Settled		Total Keluhan Total Complaint	Selesai Settled	
		Total	%	Total	%		Total	%		Total	%
Transaksi Gagal di ATM Failed Transaction at ATM	**99**	**98**	**98.99**	**1**	**1.01**	80	80	100.00	113	113	100.00
Internet/Mobile Banking	**570**	**568**	**99.65**	**2**	**0.35**	597	597	100.00	405	405	100.00
Internet Banking Business	**3**	**3**	**100.00**	**-**	**-**	5	5	100.00	11	11	100.00
Tabungan Savings Account	**12**	**12**	**100.00**	**-**	**-**	7	7	100.00	1	1	100.00
EDC	**-**	**-**	**-**	**-**	**-**	1	1	100.00	5	5	100.00
Deposito Time Deposits	**6**	**6**	**100.00**	**-**	**-**	3	699	100.00	-	-	-
Kredit Pembiayaan Modal Kerja Working Capital Financing Loans	**1**	**1**	**100.00**	**-**	**-**	6	6	100.00	2	2	100.00
Total	**691**	**688**	**99.57**	**3**	**0.43**	699	695	99.43	537	537	100.00

Pengelolaan *Human Capital* yang Berkualitas

Bank menempatkan pengelolaan *Human Capital* (HC) sebagai prioritas strategis untuk mendukung pertumbuhan berkelanjutan. Proses pengelolaan dilakukan sejak rekrutmen hingga pengembangan karier, dengan fokus pada kecukupan jumlah, peningkatan kompetensi, dan profesionalisme karyawan. Seluruh program HC dirancang selaras dengan strategi bisnis serta dipantau manajemen guna memastikan kontribusi optimal terhadap keunggulan kompetitif Bank.

Kebijakan Pengelolaan *Human Capital*

Bank Victoria menetapkan pedoman pengelolaan HC melalui Kebijakan *Human Capital Management* yang dituangkan dalam Surat Keputusan Direksi No. 020/SK-DIR/12/25 tanggal 24 Desember 2025 serta Standar Operasional Prosedur *Human Capital Management* berdasarkan Surat Keputusan Direksi No. 021/SK-DIR/12/25 tanggal 24 Desember 2025. Kebijakan ini menjadi dasar bagi seluruh proses pengelolaan HC, mulai dari perencanaan kebutuhan tenaga kerja hingga pengembangan berkelanjutan.

Quality Human Capital Management

The Bank prioritizes Human Capital (HC) management as a strategic priority to support sustainable growth. The management process is carried out from recruitment to career development, with a focus on employee adequacy, competency development, and professionalism. All HC programs are designed in line with business strategy and are monitored by the management to ensure optimal contribution to the Bank's competitive advantage.

Human Capital Management Policy

Bank Victoria establishes guidelines for HC management through the Human Capital Management Policy outlined in the Board of Directors' Decision Letter No. 020/SK-DIR/12/25 dated 24 December 2025 and Standard Operating Procedures for Human Capital Management based on the Board of Directors Decision Letter No. 021/SK-DIR/12/25 dated 24 December 2025. These policies serve as the basis for all HC management processes, from workforce needs planning to sustainable development.

Selain itu, Bank menegaskan komitmen dalam membangun hubungan industrial yang sehat dan berimbang antara perusahaan dan karyawan. Landasan hubungan industrial tersebut mengacu pada Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.250523020/P-1/VIII/2025 tanggal 8 Agustus 2025 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk. Peraturan ini ditinjau dan diperbarui secara berkala sesuai perkembangan regulasi ketenagakerjaan guna menciptakan lingkungan kerja yang harmonis, produktif, serta berkelanjutan.

Keberagaman di Bank Victoria

Bank Victoria membangun budaya kerja yang menghargai keberagaman dan menjunjung nilai inklusivitas. Setiap individu diberikan kesempatan yang sama untuk berkembang, tanpa diskriminasi atas dasar etnis, agama, gender, maupun latar belakang lainnya. Keberagaman pandangan dan pengalaman dipandang sebagai kekuatan yang mendorong munculnya ide-ide inovatif serta memperkuat kualitas pengambilan keputusan. Dengan kebijakan yang transparan dan berkeadilan, Bank secara konsisten mendukung pengembangan talenta dari berbagai latar belakang agar dapat memberikan kontribusi terbaik bagi kemajuan Bank.

Hak Asasi Manusia [S-09]

Bank Victoria menjamin pemenuhan hak asasi karyawan melalui kebijakan yang adil mengenai waktu kerja dan pemberian izin, sebagaimana dijelaskan berikut:

1. Bank menerapkan jam kerja yang proporsional sesuai dengan standar, serta menetapkan waktu kerja lembur dilengkapi fasilitas yang disesuaikan dengan kebutuhan operasional.
2. Setiap karyawan Bank Victoria diberikan izin untuk menjalankan ibadah sesuai dengan kepercayaan yang diyakini.
3. Karyawan Bank diizinkan untuk meninggalkan pekerjaan dengan tetap menerima gaji penuh karena:
    a. Peristiwa khusus, yaitu pernikahan karyawan, karyawan menikahkan anak, suami/istri/anak/menantu/orang tua/mertua/anggota dalam 1 (satu) rumah meninggal dunia, kelahiran anak, istri karyawan mengalami keguguran kandungan, khitanan anak, pembaptisan anak.
    b. Sakit, yaitu sakit dengan surat dokter, sakit tanpa surat dokter selama 1 (satu) hari dan sakit dengan rawat inap.
    c. Keperluan pribadi yang penting, mendadak, dan tidak dapat diwakilkan.
    d. Mengalami halangan di luar kemampuan karyawan.
4. Karyawan yang telah bekerja di Bank selama 1 (satu) tahun secara terus menerus dapat mengambil cuti tahunan dengan tetap menerima gaji penuh. Lamanya cuti tahunan diatur berdasarkan jabatan karyawan, berdasarkan ketentuan yang berlaku di Bank.

Furthermore, the Bank affirms its commitment to building healthy and balanced industrial relations between the Company and its employees. This industrial relations basis refers to the Decree of the Director General of Development of Industrial Relations and Social Security for Workers No. Kep.4/HI.00.00/00.0000.250523020/P-1/VIII/2025 dated 8 August 2025 on Approval of Company Regulations of PT Bank Victoria International Tbk. This regulation is periodically reviewed and updated in line with the developments in employment regulations to create a harmonious, productive, and sustainable work environment.

Diversity in Bank Victoria

Bank Victoria fosters a work culture that values diversity and upholds the value of inclusivity. Every individual is given equal opportunities to develop, with no discrimination on ethnicity, religion, gender, or other background. Diversity of perspectives and experiences is seen as a strength that drives innovative ideas and strengthens the quality of decision-making. With transparent and equitable policies, the Bank consistently supports talent development from diverse backgrounds so that they can best contribute to the Bank's progress.

Human Rights [S-09]

Bank Victoria guarantees the fulfillment of employee human rights through fair policies regarding working hours and granting of leaves, as explained below:

1. The Bank implements proportional work hours, follows standards, and determines overtime hours and overtime facilities adjusted to the operational requirements.
2. Each employee of Bank Victoria is allowed to practice worship according to the respective belief.
3. The Bank gives its employees permission to leave work while still receiving full salary for:
    a. Special events, i.e. employee's marriage, marriage of employee's child, death of employee's husband/wife/child/child-inlaw/parent/parent-in-law/other family member living in employee's household, child birth, employee's wife experiencing miscarriage, circumcision of child, baptism of child.
    b. Sick, i.e. illness with doctor's note, illness without doctor's reference letter for 1 (one) day, and illness requiring hospitalization.
    c. Urgent personal matter, sudden necessity that cannot be represented by others.
    d. Experiencing obstacles beyond employee's control.
4. Employees who have worked in the Bank for 1 (one) consecutive year can take annual leave with full salary payment. The length of annual leave is determined based on employee's position, according to regulations applied at the Bank.

Kepatuhan terhadap Praktik Kerja tanpa Tenaga Kerja Anak dan Tenaga Kerja Paksa

[POJK F.19] [S-10]

Bank Victoria senantiasa memastikan praktik ketenagakerjaan dijalankan sesuai prinsip etika dan regulasi yang berlaku. Bank tidak pernah mempekerjakan anak di bawah usia 18 tahun maupun memberlakukan kerja paksa dalam bentuk apa pun. Setiap karyawan memperoleh hak-haknya secara proporsional, meliputi gaji, cuti, dan remunerasi yang sejalan dengan standar industri serta kinerja individu. Dalam pelaksanaannya, Bank menetapkan waktu kerja yang wajar serta mendukung terciptanya keseimbangan kehidupan kerja melalui fasilitasi berbagai kegiatan seni, budaya, dan olahraga yang memperkuat rasa kebersamaan.

Sepanjang tahun 2025, tidak terdapat laporan maupun pengaduan mengenai pelanggaran terkait pekerja anak atau kerja paksa, yang juga tercermin dari data karyawan dengan rentang usia seluruhnya di atas 18 tahun.

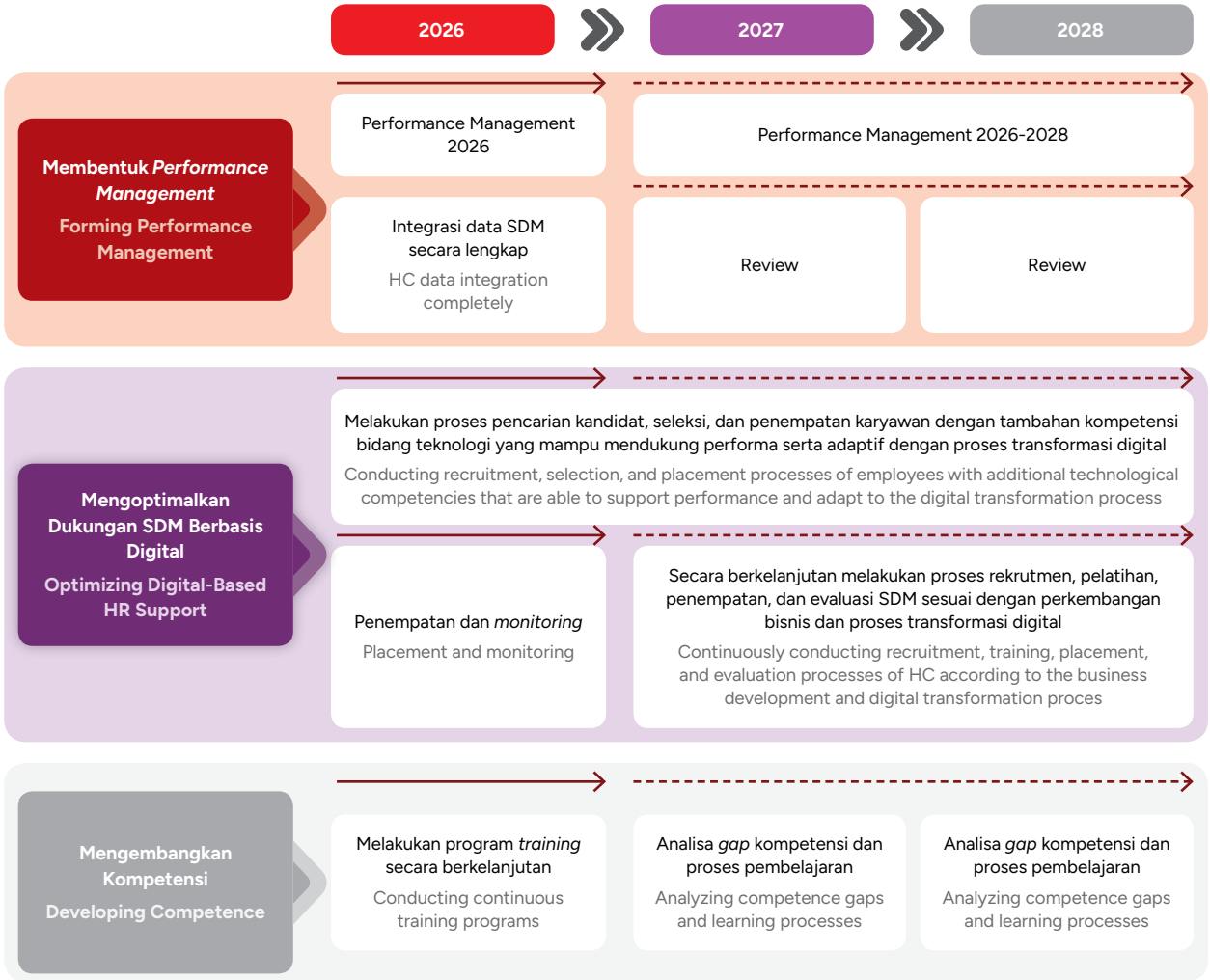
Compliance with Zero Child Labor and Forced Labor Employment Practice

[POJK F.19] [S-10]

Bank Victoria consistently ensures that employment practices are carried out in accordance with ethical principles and applicable regulations. The Bank never employs children under the age of 18 nor uses any form of forced labor. Every employee receives the rights proportionally, including salary, leave, and remuneration in line with industry standards and individual performance. In practice, the Bank establishes reasonable working hours and supports a work-life balance by facilitating various arts, cultural, and sports activities that strengthen a sense of solidarity.

Throughout 2025, there were no reports or complaints on violations related to child labor or forced labor, as also reflected in the data showing that all employees were above the age of 18.

Roadmap Pengelolaan *Human Capital*
Human Capital Management Roadmap



Perencanaan Kebutuhan *Human Capital*

Setiap tahun, Bank Victoria menyusun rencana kebutuhan HC dengan mempertimbangkan analisis jabatan, formasi organisasi, serta hasil evaluasi kinerja dan potensi karyawan. Untuk tahun 2026, perhatian utama diarahkan pada proses rekrutmen yang dilakukan untuk mengisi kekosongan posisi jabatan akibat pengunduran diri, promosi, atau rotasi karyawan yang berfokus pada optimalisasi dan sinergi seluruh tenaga kerja.

Kesetaraan Kesempatan Bekerja [POJK F.18]

Dalam penerapan inisiatif kesetaraan kesempatan kerja, Bank Victoria senantiasa menjunjung prinsip keadilan dan non-diskriminasi, sekaligus memberikan prioritas kepada tenaga kerja lokal. Proses rekrutmen dilaksanakan berlandaskan Kebijakan *Human Capital Management* dan Standar Operasional Prosedur *Human Capital Management*, yang mencakup pengadaan karyawan tetap, kontrak, maupun *outsourcing*. Seluruh tahapan seleksi dilakukan secara transparan, mulai dari seleksi administrasi, tes kemampuan dan kepribadian, wawancara oleh *Human Capital Management* dan *end user*, tes psikologi dan tes simulasi pekerjaan, hingga penilaian oleh pihak independen, untuk memastikan terpilihnya kandidat yang memiliki kompetensi dan integritas terbaik.

Kesetaraan Gender [S-01]

Sebagai wujud komitmen terhadap prinsip keberlanjutan dan praktik ketenagakerjaan yang bertanggung jawab, Bank Victoria secara konsisten memantau komposisi karyawan berdasarkan gender di setiap jenjang jabatan. Pemantauan ini bertujuan untuk memastikan keterwakilan yang seimbang antara pria dan wanita, baik pada posisi *entry-level* maupun pada *executive-level*. Upaya tersebut menjadi bagian dari strategi Bank dalam menciptakan lingkungan kerja yang adil, inklusif, dan mendukung kesetaraan kesempatan bagi seluruh karyawan. Berikut gambaran distribusi karyawan berdasarkan gender dalam 3 (tiga) tahun terakhir:

Planning for Human Capital Needs

Each year, Bank Victoria prepares HC needs plan, by considering position analysis, organizational structure, and employee performance and potential evaluation results. For 2026, the main focus will be on the recruitment process to fill vacant positions resulting from resignations, promotions, or employee rotations, focusing on optimizing and synergizing the entire workforce.

Equal Employment Opportunity [POJK F.18]

In implementing equal employment opportunity initiatives, Bank Victoria consistently upholds the principles of fairness and non-discrimination, while prioritizing local workers. Recruitment process is conducted based on Human Capital Management Policy and Standard Operating Procedures for Human Capital Management, which cover the recruitment of permanent, contract, and outsourcing employees. All stages of the selection process are conducted transparently, starting from administration selection, capability and personality tests, interview by Human Capital Management and end user, psychological test and job simulation test, to assessment by independent party, in order to ensure that the candidates selected have the best competence and integrity.

Gender Equality [S-01]

As the manifestation of its commitment to sustainability principles and responsible employment practices, Bank Victoria consistently monitors its employee composition based on gender at every level of position. This monitoring aims to ensure balanced representation of male and female, both in entry-level and executive-level positions. This effort is part of the Bank's strategy to create a fair, inclusive work environment that supports equal opportunities for all employees. The following is an overview of employee distribution by gender over the past 3 (three) years:

Level Jabatan Level of Position	2025				2024				2023			
	Pria Male	%	Wanita Female	%	Pria Male	%	Wanita Female	%	Pria Male	%	Wanita Female	%
Entry-Level	**289**	**39.97**	**257**	**35.55**	294	39.41	266	35.66	281	39.41	251	35.20
Middle-Level	**48**	**6.64**	**44**	**6.09**	50	6.70	49	6.57	50	7.01	44	6.17
Senior-Level	**30**	**4.15**	**42**	**5.81**	33	4.42	42	5.63	33	4.63	42	5.89
Executive-Level	**11**	**1.52**	**2**	**0.28**	10	1.34	2	0.27	10	1.40	2	0.28
Total	**378**	**52.28**	**345**	**47.72**	**387**	**51.88**	**359**	**48.12**	**374**	**52.45**	**399**	**47.55**

Karyawan berdasarkan Gender dan Kelompok Usia [S-02]

Selain aspek gender, Bank Victoria juga memperhatikan distribusi karyawan berdasarkan kelompok usia pada setiap jenjang jabatan. Komposisi ini menjadi indikator penting keberagaman dan inklusivitas, sebagaimana ditunjukkan pada data berikut:

Employees by Gender and Age Group [S-02]

Apart from gender, Bank Victoria also pays attention to the distribution of employees by age group at every level of position. This composition is an important indicator of diversity and inclusivity, as demonstrated in the following data:

Rentang Usia (Tahun) Age Range (Years Old)	2025								Total Karyawan Total Employees
	Entry-Level		Middle-Level		Senior-Level		Executive-Level		
	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	
18-25	22	74	-	-	-	-	-	-	96
26-35	109	118	4	8	3	-	-	-	242
36-45	111	52	22	22	11	12	-	1	231
46-55	44	10	17	11	8	22	5	1	118
>55	3	3	5	3	8	8	6	-	36

Rentang Usia (Tahun) Age Range (Years Old)	2024								Total Karyawan Total Employees
	Entry-Level		Middle-Level		Senior-Level		Executive-Level		
	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	
18-25	21	55	-	-	-	-	-	-	76
26-35	100	132	5	9	3	-	-	-	249
36-45	116	64	18	24	9	11	-	1	243
46-55	50	11	18	13	11	23	4	1	131
>55	7	4	9	3	10	8	6	-	47

Rentang Usia (Tahun) Age Range (Years Old)	2023								Total Karyawan Total Employees
	Entry-Level		Middle-Level		Senior-Level		Executive-Level		
	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	Pria Male	Wanita Female	
18-25	26	50	-	-	-	-	-	-	76
26-35	90	125	5	8	3	1	-	-	232
36-45	117	61	21	23	6	11	-	1	240
46-55	44	13	18	11	14	20	4	1	125
>55	4	2	6	2	10	10	6	-	40

Kebijakan Pelecehan Seksual dan/atau Non-Diskriminasi [S-08]

Bank Victoria memastikan lingkungan kerja yang aman, bermartabat, serta bebas dari segala bentuk pelecehan maupun diskriminasi. Setiap karyawan dilindungi dari tindakan yang berpotensi merugikan, baik secara fisik, emosional, maupun profesional, termasuk pelecehan seksual dan perlakuan diskriminatif berbasis gender, ras, agama, atau kondisi lainnya. Landasan kebijakan ini tercermin dalam Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.250523020/P-1/VIII/2025

Sexual Harassment and/or Non Discrimination Policies [S-08]

Bank Victoria ensures a safe and dignified work environment that is free from all forms of harassment and discrimination. Every employee is protected from potentially harmful actions, whether physical, emotional, or professional, including sexual harassment and discriminatory treatment based on gender, race, religion, or other conditions. The basis for this policy is reflected in the Decree of the Director General of Development of Industrial Relations and Social Security for Workers No. Kep.4/HI.00.00/00.0000.250523020/P-1/VIII/2025

tanggal 8 Agustus 2025 tentang Pengesahan Peraturan Perusahaan PT Bank Victoria International Tbk, serta Surat Keputusan Direksi No. 024A/SK-DIR/02/23 tentang Pedoman Kode Etik Perilaku Karyawan PT Bank Victoria International Tbk. Untuk memperkuat implementasinya, Bank melaksanakan sosialisasi internal, menyediakan kanal pelaporan yang mudah diakses, serta menjamin penanganan laporan dilakukan secara adil, transparan, dan akuntabel.

dated 8 August 2025 on Approval of Company Regulations of PT Bank Victoria International Tbk and Board of Directors' Decision Letter No. 024A/SK-DIR/02/23 on Employee's Code of Conduct of PT Bank Victoria International Tbk. To strengthen its implementation, the Bank conducts internal dissemination, provides easily accessible reporting channels, and ensures that reports are handled fairly, transparently, and accountably.

Pengembangan Kompetensi *Human Capital*

[POJK F.22] [S-05]

Untuk mendukung pembelajaran berkelanjutan dan peningkatan kompetensi HC, Bank Victoria menetapkan strategi pengembangan HC berfokus pada pemberdayaan HC dalam rangka menunjang keberhasilan Bank dengan menjaga tingkat kualitas sumber daya manusia secara berkelanjutan. Dalam rangka mewujudkan visi dan misi Bank ke depan tentu memerlukan dukungan sumber daya manusia yang produktif dan secara umum sesuai dengan strategi pengembangan sumber daya manusia ke depan, yaitu menyiapkan performance oriented dan personel yang memiliki kompetensi sebagai kunci penggerak pertumbuhan bisnis Bank Victoria. Strategi pengembangan HC di antaranya akan dilaksanakan melalui penguatan struktur organisasi dan kebijakan serta proses rekrutmen dan proses pelatihan karyawan.

Human Capital Competency Development

[POJK F.22] [S-05]

To support continuous learning and HC competency improvement, Bank Victoria establishes HC development strategy focused on empowering HC personnel to support the Bank's success by sustainably maintaining the quality of its human capital. To realize the Bank's vision and mission in the future, it certainly requires the support of human capital that is productive and generally in line with the Company's future human capital development strategy, aiming to develop performance-oriented and competent personnel as key drivers of Bank Victoria's business growth. The HC development strategy will be implemented through reinforcement of the organizational structure and policies, as well as employee recruitment and training processes.

Selain itu, beberapa strategi yang akan diterapkan sebagai berikut:

1. ***Membentuk Performance Management***
   Menerapkan performance management *process* di seluruh organisasi yang didukung oleh *Key Performance Indicator* (KPI) yang jelas dan transparan serta mekanisme penghargaan yang kuat.
2. **Mengoptimalkan Dukungan SDM Berbasis Digital**
   Menempatkan karyawan yang kompeten dan produktif khususnya yang mempunyai latar belakang tambahan bidang teknologi sehingga mampu beradaptasi dengan proses transformasi digital.
3. **Mengembangkan Kompetensi Karyawan**
   Membentuk HC yang andal didukung oleh program pelatihan sesuai dengan ketentuan pemenuhan kompentensi kerja karyawan termasuk mengembangkan officer development program sebagai program untuk mempersiapkan karyawan menempati posisi manajerial.

Furthermore, several strategies that will be implemented are as follows:

1. **Forming Performance Management**
   Implementing performance management process throughout the organization, supported by clear and transparent Key Performance Indicators (KPIs) and a robust reward mechanism.
2. **Optimizing Digital-Based HC Support**
   Placing competent and productive employees, especially those with additional technology backgrounds, so they can adapt to the digital transformation process.
3. **Developing Employee Competencies**
   Establishing a reliable HC team, supported by training programs in accordance with employee competency requirements, including developing officer development program to prepare employees for managerial positions.

Berikut gambaran pelaksanaan pengembangan kompetensi yang telah direalisasikan sepanjang tahun 2025:

The following is an overview of competency development implemented throughout 2025:

Jenis Pelatihan Type of Training	Jumlah Pelatihan Total Trainings					Total Pelatihan Total Trainings	Komposisi Composition (%)
	Dewan Komisaris Board of Commissioners	Direksi Board of Directors	Manajer Manager	Officer	Non-Staff		
Training/Inhouse	9	15	2,224	4,144	331	6,723	75.70
Refreshment Training	2	4	400	648	-	1,054	11.87
Training/Public	4	6	79	53	-	142	1.60
Seminar/Public	-	1	17	60	-	78	0.88
Certification	2	1	47	100	-	150	1.69
Certification Training	6	5	307	416	-	734	8.26
Educational Scholarship	-	-	-	-	-	-	-
Total	**23**	**32**	**3,074**	**5,421**	**331**	**8,881**	**100.00**
Komposisi (%) Composition (%)	**0.26**	**0.36**	**34.61**	**61.04**	**3.73**	**100.00**	
Biaya Pengembangan Kompetensi (Rp) Competency Development Cost (Rp)							**5,230,114,036**
Rata-Rata Jam Pelatihan per Karyawan (Jam/Karyawan) Average Training Hours per Employee (Hours/Employee)							**5**
Total Karyawan yang Ikut Serta dalam Program Pelatihan Total Employees Participating in Training Programs							**592**
Total Karyawan Total Employees							**723**
Persentase Total Karyawan yang Ikut Serta dalam Program Pelatihan (%) Percentage of Total Employees Participating in Training Programs (%)							**81.88**

Dalam rangka memperkuat penyebaran pengetahuan secara merata dan berkelanjutan, Bank Victoria mengimplementasikan sistem *Knowledge Management* yang terintegrasi melalui VCU. Program ini berfungsi sebagai wadah untuk menghimpun, mengelola, dan membagikan pengetahuan, keterampilan, serta pengalaman kerja karyawan agar dapat dimanfaatkan secara luas oleh seluruh tim.

To streng then the equitable and sustainable dissemination of knowledge, Bank Victoria implements an integrated Knowledge Management system through VCU. This program serves as a platform for collecting, managing, and sharing employee knowledge, skills, and work experience for broad utilization by the entire team.

Proses berbagi pengetahuan dilakukan melalui berbagai metode, baik tatap mukaseperti pelatihan, forum diskusi, dan sosialisasi maupun digital, antara lain melalui platform *e-learning*, intranet V-Smart, dan publikasi internal Vic-News. Untuk memastikan efektivitas, VCU juga melakukan evaluasi pasca pelatihan, yang hasilnya digunakan sebagai acuan dalam merancang kebutuhan pelatihan berikutnya serta meningkatkan kualitas program pengembangan karyawan.

The knowledge sharing process is carried out through various methods, both in-person, such as training, discussion forums, and dissemination, and digital form, including through e-learning platform, V-Smart intranet, and Vic-News internal publication. To ensure their effectiveness, VCU also conducts post-training evaluations, the results of which are used as a reference in designing subsequent training needs and improving the quality of employee development programs.

Penilaian Kinerja *Human Capital*

Bank Victoria melaksanakan penilaian kinerja HC secara terstruktur berdasarkan Kebijakan *Human Capital Management* yang ditetapkan melalui Surat Keputusan Direksi No. 020/SK-DIR/12/25 serta Standar Operasional

Human Capital Performance Assessment

Bank Victoria carries out structured HC performance assessments based on Human Capital Management Policy established through the Board of Directors' Decision Letter No. 020/SK-DIR/12/25 and Standard Operating Procedures

Prosedur *Human Capital Management* yang disahkan dengan Surat Keputusan Direksi No. 021/SK-DIR/12/25 tanggal 24 Desember 2025.

Evaluasi kinerja dilakukan dengan mengukur pencapaian target, pengembangan kompetensi, dan konsistensi penerapan nilai inti Bank. Mekanisme ini menggunakan indikator KPI yang terintegrasi dengan *Balanced Scorecard*, sehingga penilaian mencakup kontribusi individu sekaligus efektivitas proses bisnis internal.

Penilaian kinerja dilaksanakan 2 (dua) kali dalam setahun untuk mengidentifikasi kekuatan, menemukan area perbaikan, serta menilai efektivitas sistem yang berlaku. Hasil penilaian menjadi dasar dalam pengambilan keputusan terkait peningkatan remunerasi, pemberian bonus, maupun penghargaan finansial dan non-finansial, yang seluruhnya disesuaikan dengan kondisi keuangan Bank.

Pengembangan Karier *Human Capital*

Bank Victoria menerapkan sistem pengembangan karier HC yang berlandaskan prinsip kesetaraan kesempatan serta pedoman manajemen karier melalui *Prudential Career Management Guideline*. Setiap karyawan diberikan akses yang adil terhadap berbagai peluang karier, baik dalam bentuk promosi jabatan, rotasi, maupun penugasan lintas fungsi.

Pendekatan ini dirancang tidak hanya untuk memastikan kesinambungan karier, tetapi juga untuk mendorong peningkatan kompetensi dan kinerja secara berkelanjutan. Evaluasi berkala digunakan untuk mengidentifikasi HC dengan potensi dan pencapaian unggul, yang selanjutnya diprioritaskan menempati posisi strategis.

Sebagai dukungan tambahan, Bank menyediakan berbagai program pelatihan dan bimbingan agar pengembangan karier karyawan sejalan dengan kebutuhan organisasi serta sasaran bisnis. Adapun informasi mengenai jumlah HC yang memperoleh program pengembangan karier dalam 3 (tiga) tahun terakhir sebagai berikut:

for Human Capital Management ratified by the Board of Directors' Decision Letter No. 021/SK-DIR/12/25 dated 24 December 2025.

Performance evaluations are conducted by measuring target achievement, competency development, and consistent implementation of the Bank's core values. This mechanism uses KPI integrated with the Balanced Scorecard, thus the assessments encompass both individual contributions and internal business process effectiveness.

Performance assessments are conducted twice a year to identify strengths, uncover areas for improvement, and assess the effectiveness of the current system. The assessment results then serve as the basis for making decisions on remuneration increase, bonus, and financial and non-financial rewards, all of which are adjusted to the Bank's financial condition.

Human Capital Career Development

Bank Victoria implements HC career development system based on the principle of equal opportunity and career management guidelines set out in Prudential Career Management Guidelines. Every employee is provided by fair access to various career opportunities, including job promotion, rotation, or cross-functional assignments.

This approach is designed not only to ensure career continuity but also to encourage continuous improvement in competency and performance. Periodic evaluations are used to identify HC with outstanding potential and achievements, who are then prioritized to occupy strategic positions.

As additional support, the Bank provides various training and mentoring programs to ensure that the employee career development is in line with organizational needs and business objectives. Information on the number of HCs receiving career development programs in the past 3 (three) years is as follows:

Pengembangan Karier Career Development	**Jumlah Karyawan** Total Employees								
	2025			**2024**			**2023**		
	Pria Male	**Wanita** Female	**Total**	**Pria** Male	**Wanita** Female	**Total**	**Pria** Male	**Wanita** Female	**Total**
Promosi ke Jabatan yang Lebih Tinggi Promotion to a Higher Position	**4**	**6**	**10**	6	9	15	8	9	17
Mutasi pada Jenjang yang Selevel Transfer at the Same Level	**20**	**48**	**68**	19	28	47	14	34	48

Human Capital Engagement

Bank Victoria menempatkan *Human Capital Engagement* sebagai salah satu tolok ukur utama untuk menilai tingkat keterikatan emosional karyawan terhadap perusahaan. Untuk memperkuat keterlibatan tersebut, Bank menyediakan berbagai kesempatan pengembangan, mulai dari program pendidikan dan pelatihan hingga pengembangan karier melalui promosi, rotasi, dan perluasan tugas.

Kinerja karyawan dievaluasi menggunakan sistem *Balanced Scorecard* yang diterapkan di seluruh level organisasi, dengan pemantauan berkesinambungan melalui mekanisme *coaching*, *counseling*, dan *controlling*. Selain itu, Bank memastikan kebijakan remunerasi disusun secara adil dan transparan, di mana struktur penggajian didasarkan pada hasil penilaian kinerja, jenjang jabatan, serta peringkat karyawan. Seluruh upaya ini diarahkan untuk meningkatkan motivasi, memperkuat rasa memiliki, serta mendorong kontribusi optimal karyawan terhadap pencapaian tujuan Bank.

Industrial Relations

Bank Victoria menegaskan komitmen dalam membangun hubungan industrial yang sehat melalui penciptaan lingkungan kerja yang inklusif, positif, dan adaptif. Landasan hubungan kerja tersebut dituangkan dalam Peraturan Perusahaan yang telah memperoleh pengesahan dari Kementerian Ketenagakerjaan melalui Surat Keputusan Direktur Jenderal Pembinaan Hubungan Industrial dan Jaminan Sosial Tenaga Kerja No. Kep.4/HI.00.00/00.0000.250523020/P-1/VIII/2025 tanggal 8 Agustus 2025. Peraturan ini diperbarui secara berkala untuk menyesuaikan dengan dinamika regulasi ketenagakerjaan serta perkembangan industri perbankan nasional. Melalui kepatuhan pada ketentuan yang berlaku, Bank berupaya mewujudkan iklim kerja yang kondusif, seimbang, dan produktif bagi seluruh karyawan.

Internalisasi Budaya Perusahaan *Human Capital*

Bank Victoria membangun Budaya Perusahaan sebagai landasan dalam mendorong transformasi organisasi yang berkelanjutan. Proses ini dirancang melalui tahapan yang terstruktur, dimulai dari *awareness* untuk menumbuhkan pemahaman bersama mengenai nilai-nilai inti perusahaan, dilanjutkan dengan *engagement* yang memperkuat keterlibatan aktif seluruh karyawan dalam penerapan budaya kerja sehari-hari. Tahap berikutnya adalah *acceptance*, di mana karyawan tidak hanya memahami tetapi juga menerima nilai budaya tersebut sebagai bagian penting dalam mendukung kinerja dan perilaku profesional. Pada akhirnya, tahapan *ownership* menjadi puncak proses, ketika karyawan mampu menjadikan budaya perusahaan sebagai bagian dari identitas pribadi dan organisasi.

Human Capital Engagement

Bank Victoria prioritizes Human Capital Engagement as one of the primary benchmarks for assessing employees' emotional attachment to the Company. To strengthen this engagement, the Bank provides various development opportunities, ranging from education and training programs to career development through promotion, rotation, and job enlargement.

Employee performance is evaluated by using the Balanced Scorecard system, implemented at all levels of the organization, with continuous monitoring through coaching, counseling, and control mechanisms. Furthermore, the Bank ensures that its remuneration policy is formulated fairly and transparently, with the salary structure determined based on performance assessment results, position level, and employee rank. All of these efforts are aimed at increasing motivation, strengthening a sense of belonging, and encouraging optimal employee contribution to achieving the Bank's goals.

Industrial Relations

Bank Victoria affirms its commitment to building healthy industrial relations by creating an inclusive, positive, and adaptive work environment. The basis of this employment relationship is outlined in the Company Regulation, approved by the Ministry of Manpower through the Decree of Director General of Development of Industrial Relations and Social Security for Workers No. Kep.4/HI.00.00/00.0000.250523020/P-1/VIII/2025 dated 8 August 2025. This regulation is periodically updated to adapt to the dynamics of employment regulations and developments in the national banking industry. Through compliance with applicable regulations, the Bank strives to create a conducive, balanced, and productive work climate for all employees.

Internalization of Human Capital Corporate Culture

Bank Victoria builds a Corporate Culture as the basis for driving sustainable organizational transformation. This process is designed through structured stages, starting with awareness to foster a shared understanding of the Company's core values, followed by engagement, which strengthens the active involvement of all employees in the daily implementation of the culture. The next stage is acceptance, in which employees not only understand but also accept these cultural values as an essential part of supporting professional performance and behavior. Finally, the ownership stage culminates in the process, when employees are able to make corporate culture part of their personal and organizational identity.

Untuk memperkuat penerapan budaya ini, Bank Victoria melaksanakan berbagai inisiatif, mulai dari sosialisasi nilai, internalisasi melalui program pelatihan, penyesuaian sistem dan kebijakan organisasi agar selaras dengan budaya perusahaan, hingga pemberian pengakuan dan apresiasi bagi karyawan yang menunjukkan konsistensi dalam penerapan nilai tersebut. Seluruh upaya ini dijalankan secara berkesinambungan agar tercipta lingkungan kerja yang profesional, inovatif, dan berorientasi pada peningkatan kinerja.

To strengthen the implementation of this culture, Bank Victoria implements various initiatives, ranging from value dissemination, internalization through training programs, adjustments to organizational systems and policies to align with the Company culture, and providing recognition and appreciation for employees who demonstrate consistent implementation of such values. All of these efforts are carried out continuously to create a professional, innovative, and performance-oriented work environment.

Total *Human Capital* [POJK C.3]
Total Human Capital

Uraian Description	2025				2024				2023			
	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%
Level Organisasi **Organizational Level**												
Direksi Boards of Directors	**4**	**1**	**5**	**0.69**	4	1	5	0.67	4	1	5	0.70
Manajemen Management	**85**	**87**	**172**	**23.79**	89	92	181	24.26	87	84	171	23.98
Staf Staff	**289**	**257**	**546**	**75.532**	294	266	560	75.07	283	254	537	75.32
Total	**378**	**345**	**723**	**100.00**	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**
Tingkat Pendidikan **Educational Level**												
Doktor Doctorate	**2**	**-**	**2**	**0.28**	2	-	2	0.27	2	-	2	0.28
Pascasarjana Post-Graduates	**27**	**9**	**36**	**4.98**	26	10	36	4.83	24	12	36	5.05
Sarjana Graduates	**192**	**231**	**423**	**58.50**	195	241	436	58.45	185	223	408	57.22
Diploma	**29**	**67**	**96**	**13.28**	29	76	105	14.08	28	72	100	14.03
<SMA <High School	**128**	**38**	**166**	**22.96**	135	32	167	22.39	135	32	167	23.42
Total	**378**	**345**	**723**	**100.00**	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**
Status Karyawan **Employment Status**												
Karyawan Tetap Permanent Employee	**223**	**213**	**436**	**60.30**	212	226	438	58.71	199	211	410	57.50
Karyawan Tidak Tetap Non-Permanent Employee	**28**	**130**	**158**	**21.86**	41	131	172	23.06	42	127	169	23.70
Outsourcing	**127**	**2**	**129**	**17.84**	134	2	136	18.23	133	1	134	18.80
Total	**378**	**345**	**723**	**100.00**	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**
Usia **Age**												
>60 Tahun >60 Years Old	**7**	**9**	**16**	**2.21**	11	7	18	2.41	7	6	13	1.82
51–60 Tahun 51–60 Years Old	**47**	**39**	**86**	**11.90**	43	37	80	10.72	43	34	77	10.80

Uraian Description	2025				2024				2023			
	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%	Pria Male	Wanita Female	Total	%
41–50 Tahun 41–50 Years Old	**103**	**46**	**149**	**20.64**	112	49	161	21.58	112	49	161	21.58
31–40 Tahun 31–40 Years Old	**119**	**110**	**229**	**31.65**	125	124	249	33.38	129	117	246	34.50
21–30 Tahun 21–30 Years Old	**101**	**139**	**240**	**33.19**	95	139	234	31.37	86	132	218	30.58
18-20 Tahun 18-20 Years Old	**1**	**2**	**3**	**0.41**	1	3	4	0.54	1	3	4	0.56
Total	**378**	**345**	**723**	**100.00**	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**
Masa Kerja **Years of Services**												
>20 Tahun >20 Years	**17**	**17**	**34**	**4.70**	15	14	29	3.89	11	11	22	3.09
16-20 Tahun 16-20 Years	**29**	**33**	**62**	**8.58**	30	32	62	8.31	23	14	37	5.19
11-15 Tahun 11-15 Years	**65**	**57**	**122**	**16.87**	58	55	113	15.15	54	47	101	14.17
6-10 Tahun 6-10 Years	**88**	**73**	**161**	**22.27**	84	37	121	16.22	86	67	153	21.46
0-5 Tahun 0-5 Years	**179**	**165**	**344**	**47.58**	200	221	421	56.43	200	200	400	56.10
Total	**378**	**345**	**723**	**100.00**	**387**	**359**	**746**	**100.00**	**374**	**339**	**713**	**100.00**

Remunerasi Karyawan [POJK F.20]

Bank Victoria senantiasa menjamin pemenuhan hak karyawan sesuai dengan ketentuan ketenagakerjaan yang berlaku di Indonesia. Salah satu wujud komitmen tersebut adalah pemberian upah yang setidaknya mengacu pada ketetapan Upah Minimum Regional (UMR) yang diperbarui setiap tahun oleh pemerintah. Kebijakan ini diterapkan untuk memastikan bahwa seluruh karyawan memperoleh standar penghasilan yang layak, serta mencerminkan kepatuhan Bank terhadap regulasi ketenagakerjaan.

Sebagai bentuk transparansi, berikut informasi mengenai perbandingan antara UMR tahun 2025 dengan tingkat upah terendah yang diterima oleh karyawan tetap Bank Victoria:

Employee Remuneration [POJK F.20]

Bank Victoria consistently ensures the fulfillment of employee rights in accordance with applicable Indonesian labor regulations. One manifestation of this commitment is the provision of wages that at least adhere to the Regional Minimum Wage (UMR), updated annually by the government. This policy is implemented to ensure that all employees receive a decent standard of income and reflects the Bank's compliance with labor regulations.

For transparency, the following information compares the UMR in 2025 with the lowest wage level received by Bank Victoria's permanent employees:

Wilayah Region	Upah Karyawan Tetap Terendah Lowest Permanent Employee's Wage (Rp)	Upah Minimum Regional Regional Minimum Wage (Rp)	Rasio Upah Karyawan Tetap Terendah Dibandingkan UMR Ratio of the Lowest Permanent Employee's Wage to UMR (%)
Bandung	4,737,700	4,737,678	100.00
Bogor	5,437,300	5,437,203	100.00
Denpasar	3,499,900	3,499,878	100.00
DKI Jakarta	5,729,900	5,729,876	100.00
Manado	4,022,100	4,022,017	100.00
Makassar	4,412,000	4,411,921	100.00

Wilayah Region	Upah Karyawan Tetap Terendah Lowest Permanent Employee's Wage (Rp)	Upah Minimum Regional Regional Minimum Wage (Rp)	Rasio Upah Karyawan Tetap Terendah Dibandingkan UMR Ratio of the Lowest Permanent Employee's Wage to UMR (%)
Medan	4,335,200	4,335,198	100.00
Semarang	3,701,800	3,701,709	100.00
Surabaya	5,288,800	5,288,796	100.00
Surakarta	2,570,000	2,570,000	100.00

Hak Cuti

Bank Victoria menempatkan kesejahteraan karyawan sebagai bagian penting dari kebijakan ketenagakerjaan yang diterapkan. Salah satunya diwujudkan melalui pemberian hak cuti yang mencakup cuti tahunan maupun cuti khusus sesuai dengan ketentuan peraturan perundang-undangan. Fasilitas cuti tersebut tidak hanya berfungsi untuk memenuhi hak karyawan, tetapi juga menjadi sarana untuk menjaga keseimbangan antara kehidupan profesional dan pribadi, sehingga mendukung terciptanya produktivitas kerja yang berkelanjutan.

Adapun data mengenai jumlah karyawan yang memanfaatkan hak cuti sepanjang tahun 2025 sebagai berikut:

Leave Rights

Bank Victoria prioritizes employee welfare as a key component of its employment policies. This is achieved through the provision of leave rights, including annual leave and special leave, in accordance with the laws and regulations. These leave facilities not only fulfill employee rights but also serve as a means to maintain a balance between professional and personal life, thus supporting a sustainable work productivity.

Data on the number of employees who utilized their leave rights throughout 2025 is as follows:

Uraian Description	2025			2024		
	Pria Male	Wanita Female	Jumlah Total	Pria Male	Wanita Female	Jumlah Total
Karyawan yang berhak mendapat cuti Employees eligible to take leave	**327**	**321**	**648**	336	309	645
Karyawan yang mengambil hak cuti Employees taking leave	**315**	**312**	**627**	323	315	638
Karyawan yang kembali bekerja pada periode pelaporan setelah cuti berakhir Employees returning to work in the reporting period after leave ends	**315**	**312**	**627**	336	309	645
Karyawan yang kembali bekerja setelah cuti berakhir, yang masih dipekerjakan 12 (dua belas) bulan setelah kembali bekerja Employees returning to work after leave ends, still employed 12 (twelve) months after returning to work	**315**	**312**	**627**	336	309	645

Program Pensiun

Bank Victoria senantiasa menjunjung tinggi pemenuhan hak-hak karyawan, termasuk hak atas program pensiun yang diberikan kepada setiap tenaga kerja yang memasuki usia 55 tahun. Program ini disusun berdasarkan Kebijakan *Human Capital Management* serta Standar Operasional Prosedur Prosedur *Human Capital Management*, sehingga pelaksanaannya berjalan secara tertib, transparan, dan sesuai regulasi.

Selain memberikan kepastian bagi karyawan yang memasuki masa purna tugas, Bank juga membuka kesempatan bagi pensiunan untuk tetap berkarya melalui skema kerja kontrak

Pension Program

Bank Victoria consistently upholds the fulfillment of employee rights, including the right to a pension program provided to every employee reaching the age of 55. This program is prepared based on Human Capital Management Policy and Standard Operating Procedures for Human Capital Management, so that its implementation is orderly, transparent, and in accordance with regulations.

Apart from providing certainty for employees approaching retirement, the Bank also provides opportunities for the retirees to continue working through contract work

sesuai kebutuhan organisasi. Dengan demikian, pengalaman dan pengetahuan yang dimiliki pensiunan tetap dapat dimanfaatkan bagi keberlanjutan perkembangan Bank.

schemes adjusted to the organization's needs. This way, the experience and knowledge gained by the retirees can still be utilized for the Bank's continued development.

Tingkat Pergantian Karyawan [S-03]

Bank Victoria memantau tingkat pergantian karyawan sebagai bagian dari upaya menjaga kesinambungan dan kualitas HC. Pergantian karyawan mencakup pengunduran diri, pemberhentian, serta perekrutan baru untuk mengisi posisi yang tersedia. Data terkait tingkat pergantian karyawan dalam 3 (tiga) tahun terakhir sebagai berikut:

Employee Turnover Rate [S-03]

Bank Victoria monitors employee turnover as part of its efforts to maintain the continuity and quality of its HC. Employee turnover includes resignation, dismissal, and new recruitment to occupy available positions. Data related to employee turnover rate over the past 3 (three) years is as follows:

Uraian Description	2025		2024		2023	
	Total	%	Total	%	Total	%
Karyawan *Resign*/Pemutusan Hubungan Kerja Employee Resigning/Termination of Employment	**104**	**14.38**	119	15.95	157	22.02
Karyawan Baru/Pengganti New/Substitute Employee	**123**	**17.01**	152	20.38	182	25.53

Tenaga Kerja Sementara [S-04]

Bank Victoria turut didukung oleh tenaga kerja sementara yang direkrut melalui pihak ketiga, seperti penyedia jasa tenaga kerja maupun konsultan. Meskipun tidak terikat langsung dengan Bank, tenaga kerja ini memiliki kontribusi yang signifikan dalam menunjang kelancaran operasional, baik pada aspek teknis maupun administratif. Kehadiran tenaga sementara memberikan fleksibilitas bagi Bank dalam menyesuaikan kebutuhan sumber daya sesuai dinamika bisnis. Data mengenai jumlah dan proporsi tenaga kerja sementara terhadap total karyawan dalam 3 (tiga) tahun terakhir sebagai berikut:

Temporary Workers [S-04]

Bank Victoria is supported by temporary workers recruited through third parties, such as labor providers and consultants. Although not directly tied to the Bank, these workers make significant contribution to supporting smooth operations, both in technical and administrative aspects. The presence of temporary workers provides the Bank with flexibility in adjusting resource needs to meet business dynamics. Data on the number and proportion of temporary workers to total employees in the past 3 (three) years is as follows:

Uraian	2025	2024	2023	Description
Total Pegawai Perusahaan yang Dipegang oleh Kontraktor dan/atau Konsultan	-	-	-	Total Company Employees Held by Contractors and/or Consultants
Total Karyawan	-	-	-	Total Employees
Persentase Total Pegawai Sementara (%)	**-**	**-**	**-**	**Percentage of Total Temporary Employees (%)**

Strategi Pengelolaan *Human Capital* Tahun 2026

Dalam rangka mendukung pencapaian visi dan sasaran strategis, Bank secara konsisten menyusun rencana kerja pengelolaan HC yang komprehensif dan berkelanjutan setiap tahunnya. Memasuki tahun 2026, Bank telah merumuskan berbagai program dan langkah pengembangan HC yang diuraikan sebagai berikut:

1. Penyempurnaan dan pengembangan penyusunan *Key Performance Indicator* (KPI) *balance score card* melalui *Human Resource Information System* (HRIS).
2. Penginian Peraturan Perusahaan *Online* melalui Pppkb. Kemnaker.Go.Id.

Human Capital Management Strategy in 2026

To support the achievement of its strategic vision and objectives, the Bank consistently prepares a comprehensive and sustainable HC management work plan every year. Entering 2026, the Bank has formulated various programs and steps for HC development as outlined below:

1. Refining and developing Key Performance Indicator (KPI) balance score card through Human Resource Information System (HRIS).
2. Updating Company Regulations Online through Pppkb. Kemnaker.Go.Id.

3. Pemenuhan kewajiban sertifikasi kompetensi sesuai ketentuan meliputi:
   a. Sertifikasi Manajemen Risiko.
   b. Sertifikasi Sistem Pembayaran dan Pengelolaan Uang Rupiah (SPPUR).
   c. Sertifikasi Anti-Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU-PPT).
   d. Sertifikasi Tresuri *Dealer*.
   e. Sertifikasi Audit.
   f. Sertifikasi Kepatuhan.
4. Penyelenggaraan program pelatihan penyegaran terkait sertifikasi kompetensi.
5. Penyelenggaraan program *training* baik secara *inhouse training* yang diselenggarakan internal bekerja sama dengan *vendor training* dan juga *training* publik terkait sesuai dengan rencana kerja pelatihan serta kebutuan divisi kerja.
6. Pelaksanaan program pelatihan bagi karyawan baru (*onboarding*).
7. Pelaksanaan program pelatihan sosialisasi terkait penginian kebijakan, sistem prosedur, dan produk Bank.
8. Pelaksanaan program pelatihan bersifat wajib (*mandatory*) bagi seluruh karyawan seperti pelatihan terkait APU-PPT, pelindungan data pribadi, dan pelindungan konsumen.
9. Pelaksanaan kebutuhan karyawan serta senantiasa melakukan program rotasi dan mutasi untuk penyegaran dan mengembangkan karier karyawan.
10. Penyampaian pelaporan ketenagakerjaan kepada pihak terkait lainnya seperti Otoritas Jasa Keuangan, Bank Indonesia, Kementerian Ketenagakerjaan, Dinas Tenaga Kerja dan Transmigrasi Wilayah, kantor pajak, dan sebagainya.

Kesehatan dan Keselamatan Kerja serta Lingkungan Kerja yang Aman dan Layak

[POJK F.21] [S-11]

Bank senantiasa menempatkan keselamatan dan kesejahteraan karyawan sebagai prioritas utama dalam menciptakan lingkungan kerja yang sehat dan produktif. Upaya ini diwujudkan melalui penyediaan fasilitas kerja yang aman, nyaman, dan sesuai standar, mulai dari tata ruang dengan pencahayaan memadai, sistem ventilasi yang baik, hingga pengendalian suhu ruangan yang mendukung kenyamanan selama bekerja. Bank juga memastikan ketersediaan sarana keselamatan kerja, seperti jalur evakuasi darurat, perangkat pemadam kebakaran, serta perawatan rutin terhadap fasilitas vital seperti lift dan peralatan elektronik untuk meminimalkan risiko kecelakaan.

Di samping itu, perlindungan kesehatan karyawan diberikan secara komprehensif melalui program Jaminan Sosial Tenaga Kerja seperti Jaminan Hari Tua (JHT), Jaminan Kecelakaan Kerja (JKK), Jaminan Kematian (JKM), dan Jaminan Pensiun (JP), yang dilengkapi dengan manfaat asuransi kesehatan bagi karyawan dan keluarganya.

3. Fulfilling competency certification obligations in accordance with provisions including:
   a. Risk Management Certification.
   b. Payment System Certification and Rupiah Money Management (SPPUR).
   c. Anti-Money Laundering and Counter-Terrorist Financing (AML-CTF) Certification.
   d. Dealer Treasury Certification.
   e. Audit Certification.
   f. Compliance Certification.
4. Organizing refreshment training programs related to competency certification.
5. Holding training programs, both in-house training, organized internally in cooperation with training vendors, and public-related training in accordance with training work plans and work division needs.
6. Organizing training programs for new (onboarding) employees.
7. Implementing dissemination training programs related to update of the Bank's policies, system procedures, and products.
8. Holding mandatory training programs for all employees, such as training on AML-CTF, personal data protection, and consumer protection.
9. Implementing employee needs and continuously carrying out rotation and transfer programs to refresh and develop employee careers.
10. Submitting employment reports to other related parties such as Financial Services Authority, Bank Indonesia, Ministry of Manpower, Regional Manpower and Transmigration Service, tax office, and so on.

Occupational Health and Safety and Safe and Decent Work Environment

[POJK F.21] [S-11]

The Bank consistently prioritizes employee safety and well-being in creating a healthy and productive work environment. This effort is realized through the provision of safe, comfortable, and standardized work facilities, ranging from room layouts with adequate lighting, good ventilation systems, to room temperature control that supports comfortable working conditions. The Bank also ensures the availability of workplace safety facilities, such as emergency evacuation routes, fire extinguishers, and routine maintenance of vital facilities like elevators and electronic equipment to minimize the risk of accidents.

In addition, comprehensive employee health protection is provided through Workers' Social Security program, including Old Age Savings Program (JHT), Occupational Accident Program (JKK), Death Benefit Program (JKM), and Pension Program (JP), complemented by health insurance benefits for employees and their families. This insurance

Asuransi tersebut mencakup layanan rawat jalan, rawat inap, perawatan gigi, hingga fasilitas persalinan. Dengan langkah-langkah tersebut, Bank berkomitmen menghadirkan lingkungan kerja yang tidak hanya aman secara fisik, tetapi juga mendukung kesejahteraan jangka panjang karyawan beserta keluarganya.

Penanganan Keadaan Darurat Keselamatan Kerja

Bank Victoria menempatkan aspek kesiapsiagaan darurat sebagai bagian penting dalam menjaga keberlangsungan operasional. Langkah awal yang dilakukan adalah melakukan pemetaan menyeluruh terhadap potensi risiko yang dapat mengganggu aktivitas kerja, mulai dari kebakaran, ledakan, dan bencana alam hingga potensi ancaman keamanan seperti sabotase, aksi teror, maupun kerusuhan. Dari hasil pemetaan tersebut, Bank menyusun pedoman penanganan keadaan darurat yang terstruktur, dengan tujuan memastikan setiap unit kerja mampu merespons cepat, tepat, dan terkoordinasi ketika menghadapi kondisi kritis.

Tingkat Kecelakaan Kerja [S-06]

Selama 3 (tiga) tahun terakhir, Bank Victoria berhasil menjaga rekam jejak positif tanpa adanya kasus kecelakaan kerja. Keberhasilan ini menunjukkan keseriusan Bank dalam membangun budaya keselamatan yang kuat melalui penerapan standar kerja yang ketat, pengawasan rutin, serta perbaikan berkelanjutan pada prosedur keselamatan. Pencapaian tersebut menjadi bukti nyata bahwa lingkungan kerja yang aman dan sehat merupakan prioritas utama Bank dalam mendukung produktivitas dan kesejahteraan karyawan.

Sarana Pengaduan terkait Pengelolaan HC [S-07]

Bank Victoria menempatkan aspek keselamatan, keberagaman, dan penghormatan terhadap hak asasi manusia sebagai bagian penting dalam pengelolaan HC. Untuk mendukung hal tersebut, Bank menyediakan kanal pengaduan yang dirancang dengan prinsip keterbukaan, akuntabilitas, dan kerahasiaan. Mekanisme ini memungkinkan karyawan maupun pihak terkait menyampaikan keluhan atau laporan, baik mengenai isu ketenagakerjaan, kesehatan dan keselamatan kerja (K3), maupun dugaan pelanggaran hak asasi manusia.

Setiap laporan yang diterima ditindaklanjuti secara objektif dan sesuai dengan ketentuan perundang-undangan, sehingga tercipta kepastian hukum sekaligus rasa aman bagi seluruh karyawan. Dalam 3 (tiga) tahun terakhir, Bank tidak menerima pengaduan terkait pengelolaan HC.

covers outpatient and inpatient, dental care, and maternity facilities. With these steps, the Bank is committed to providing a work environment that is not only physically safe but also supports the long-term well-being of employees and their families.

Occupational Safety Emergency Handling

Bank Victoria prioritizes emergency preparedness as a critical component of maintaining operational continuity. The initial step to conduct is comprehensively mapping potential risks that could disrupt work activities, ranging from fires, explosions, and natural disasters to potential security threats such as sabotage, acts of terror, and riots. Based on this mapping, the Bank prepares structured emergency management guidelines, aiming to ensure each work unit can respond in a quick, appropriate, and coordinated manner when faced with critical situations.

Occupational Accident Rate [S-06]

Over the past 3 (three) years, Bank Victoria successfully maintained a positive track record of zero occupational accident. This success demonstrates the Bank's commitment to building a strong safety culture through the implementation of strict work standards, routine supervision, and continuous improvement of safety procedures. Such achievement demonstrates that a safe and healthy work environment is a top priority for the Bank, supporting employee productivity and well-being.

Complaint Channel related to HC Management [S-07]

Bank Victoria prioritizes safety, diversity, and respect for human rights as key components of its HC management. To support such matter, the Bank provides a complaint channel designed with the principles of transparency, accountability, and confidentiality. This mechanism allows employees and related parties to submit complaints or reports, whether regarding employment issues, occupational health and safety (OHS), or alleged human rights violations.

Every report received is followed up objectively and in accordance with laws and regulations, thereby ensuring legal certainty and a sense of security for all employees. In the past 3 (three) years, the Bank did not receive any complaints related to HC management.

Berkembang Bersama Masyarakat

Bank Victoria menempatkan program tanggung jawab sosial perusahaan (*corporate social responsibility*/CSR) sebagai bagian integral dari strategi bisnis yang berorientasi pada keberlanjutan. Program ini tidak hanya berfokus pada peningkatan nilai perusahaan, tetapi juga diarahkan untuk menciptakan manfaat nyata bagi masyarakat dan lingkungan sekitar wilayah operasional Bank. Berbagai kegiatan CSR dirancang untuk memperkuat hubungan sosial, mendukung pembangunan komunitas, serta mendorong terciptanya kesejahteraan bersama. Seluruh pelaksanaan CSR dijalankan secara terarah dan terukur, dengan berpedoman pada kebijakan yang ditetapkan melalui Surat Keputusan Direksi No. 027/SK-DIR/04/21 tanggal 29 April 2021 tentang Corporate Social Responsibility (CSR).

Developing Together with the Community

Bank Victoria positions corporate social responsibility (CSR) program as an integral part of its sustainability-oriented business strategy. This program not only focuses on increasing corporate value but also aims to create tangible benefits for the communities and environment surrounding the Bank's operational areas. Various CSR activities are designed to strengthen social relationships, support community development, and encourage shared prosperity. All CSR implementation is carried out in a focused and measurable manner, guided by the policies established through the Board of Directors' Decision Letter No. 027/SK-DIR/04/21 dated 29 April 2021 on Corporate Social Responsibility (CSR).

Visi dan Misi CSR [POJK C.1]
CSR Vision and Mission

Visi
Vision

Menjadi mitra dalam meningkatkan kualitas pendidikan, kesehatan, dan kesejahteraan masyarakat untuk menjadi lebih baik serta ikut berperan dalam membangun hubungan antara perusahaan dengan masyarakat yang berkelanjutan.

To become a partner in improving the quality of education, health, and welfare of the community to be better and play a role in building sustainable relationships between the company and communities.

Misi
Mission

- Berpartisipasi dalam mengurangi keterbelakangan sosial kemasyarakatan sesuai dengan kapasitas dan kemampuan perusahaan.
- Berpartisipasi dalam meningkatkan kualitas pendidikan dasar bagi anak-anak sekolah.
- Berupaya untuk mengimplementasikan cara-cara konservasi energi dalam rutinitas pekerjaan sehari-hari.
- Berupaya untuk mendukung kegiatan serta aktivitas positif melalui kerja sama yang lebih dekat dengan berbagai komunitas di bidang perbankan.
- Ikut serta berperan dalam program pemberdayaan masyarakat secara berkelanjutan.
- To participate in reducing social backwardness in accordance with the company's capacity and capabilities.
- To participate in improving the quality of basic education for school children.
- To make efforts to implement energy conservation methods in daily work routines.
- To make efforts to support positive activities through closer cooperation with various communities in the banking sector.
- To continuously participate in community empowerment program.

Penggunaan Tenaga Kerja Lokal [POJK F.25]

Bank Victoria mendukung pertumbuhan ekonomi lokal dengan memprioritaskan perekrutan tenaga kerja dari masyarakat sekitar. Kebijakan ini tidak hanya memperkuat keterikatan Bank dengan komunitas setempat, tetapi juga memberikan kontribusi nyata terhadap peningkatan kesejahteraan sosial. Hingga saat ini, sebanyak 67,01% karyawan Bank berasal dari lingkungan sekitar wilayah operasional.

Use of Local Manpower [POJK F.25]

Bank Victoria supports local economic growth by prioritizing employee recruitment from the surrounding community. This policy not only strengthens the Bank's ties to the local community but also makes a tangible contribution to improving social welfare. To date, 67.01% of the Bank's employees come from the areas surrounding its operations.

Investasi terhadap Komunitas [POJK F.25] [S-12]

Bank Victoria memandang investasi pada komunitas sebagai bagian dari komitmen tanggung jawab sosial yang berkelanjutan. Pada tahun 2025, Bank melaksanakan program investasi komunitas yang diuraikan sebagai berikut:

Investment in the Community [POJK F.25] [S-12]

Bank Victoria views community investment as part of its commitment to sustaianable social responsibility. In 2025, the Bank carried out community investment programs outlined as follows:

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
Bantuan untuk budidaya tanaman hidroponik dan budidaya ikan nila di lingkungan SLB Surya Wiyata Assistance for hydroponic plant cultivation and tilapia fish farming in Surya Wiyata Special Needs School environment	Jl. Cempaka Bulak No. 27 Kel. Jaticempaka, Kec. Pondokgede Kota Bekasi	50

Biaya Kegiatan Investasi terhadap Komunitas

Rincian alokasi biaya unutk kegiatan investasi terhadap komunitas dalam 3 (tiga) tahun terakhir sebagai berikut:

Cost of Investment Activities to the Community

Details of the cost allocation for community investment activities in the past 3 (three) years are as follows:

2025	2024	2023
10,000,000 dalam Rupiah / in Rupiah	19,477,900 dalam Rupiah / in Rupiah	5,500,000 dalam Rupiah / in Rupiah



Sumbangan kepada Organisasi Nirlaba
[POJK F.25] [S-12]

Selain menjalankan program sosial secara mandiri, Bank Victoria juga menyalurkan dukungan melalui berbagai kegiatan sosial yang berfokus pada kepedulian terhadap masyarakat. Bantuan tersebut diwujudkan melalui kegiatan donor darah, pemberian bantuan dana, penyaluran bantuan bagi korban bencana alam di Medan, Sumatera, serta pemberian bingkisan kepada masyarakat. Adapun rincian program yang memperoleh dukungan tersebut sebagai berikut:

Donation to Non-Profit Organizations
[POJK F.25] [S-12]

In addition to running its own social programs, Bank Victoria also provides support to various non-profit organizations engaged in social, environmental, and educational fields. This assistance is provided in donations for environmental conservation activities, scholarships, and provision of learning support facilities. Details of the programs receiving this support are as follows:

Kegiatan Activity	**Lokasi** Location	**Penerima Manfaat** Beneficiaries **(Orang /** People**)**
Donor Darah Blood Donation	Gedung Graha BIP Lt. 10 Jl. Gatot Subroto Kav. 23 Jakarta Selatan 12930	100
Bantuan Dana Financial Assistance	Yayasan Karya Kasih Sekolah Luar Biasa Surya Wijaya Karya Kasih Foundation Surya Wiyata Special School Jl. Cempaka Bulak No. 27 Jaticempaka, Kec. Pondokgede Kota Bekasi, Jawa Barat	50
Bantuan Dana Bencana Alam Medan Natural Disaster Assistance for Medan	Medan	Warga Terdampak Bencana Medan Residents Affected by Disaster in Medan
Bantuan Dana Bencana Alam Sumatera Natural Disaster Assistance for Sumatra	Sumatera	Warga Terdampak Bencana Sumatera Residents Affected by Disaster in Sumatra
Pemberian Bingkisan Provision of Gifts	Sekolah Dasar Dewi Sartika Gg. Manunggal 7 No. 18, RT 6 RW 15 Kali Baru, Kec. Cilincing Jakarta Utara	100
Pemberian Bingkisan Provision of Gifts	Sekolah Dasar Imam Bonjol Jl. Raya Cadas Baru Kec. Sepatan, Kabupaten Tangerang Banten	50
Pemberian Bingkisan Provision of Gifts	Sekolah Tinggi Teologi Iman Jl. Wijaya I No. 29 – 31 Petogogan Kebayoran Baru Jakarta Selatan	80
Pemberian Bingkisan Provision of Gifts	Sekolah Luar Biasa Insan Mandiri Jl. Kruing III No. 282 Baktijaya, Sukmajaya Depok Jawa Barat	50
Pemberian Bingkisan Provision of Gifts	Sekolah Dasar Laksa Bakti Jl. Laksa III No. 60 A Jembatan Lima, Kec. Tambora Jakarta Barat	70

Biaya Kegiatan Sumbangan kepada Organisasi Nirlaba

Selama 3 (tiga) tahun terakhir, Bank Victoria secara konsisten menyalurkan dana untuk mendukung kegiatan organisasi nirlaba dengan alokasi biaya sebagai berikut:

Cost of Donation to Non-Profit Organizations

Over the past 3 (three) years, Bank Victoria consistently distributed funds to support non-profit organizations' activities with the following cost allocations:

2025	2024	2023
322,046,000 dalam Rupiah / in Rupiah	1,189,173,620 dalam Rupiah / in Rupiah	174,110,888 dalam Rupiah / in Rupiah

Program *Friday Banking* [POJK F.25] [S-12]

Pada tahun 2025, Bank mulai menyelenggarakan program *Friday Banking* sebagai salah satu inisiatif untuk memberikan nilai tambah bagi nasabah maupun masyarakat. Program ini dilaksanakan dengan tujuan mempererat hubungan dengan pemangku kepentingan, meningkatkan literasi, serta mendukung gaya hidup sehat dan produktif. Adapun rincian kegiatan *Friday Banking* yang telah dilaksanakan sepanjang tahun 2025 adalah sebagai berikut:

Friday Banking Program [POJK F.25] [S-12]

In 2025, the Bank began implementing Friday Banking program as an initiative to provide added value to customers and the community. This program aims at strengthening relationships with stakeholders, increasing literacy, and supporting a healthy and productive lifestyle. The details of Friday Banking activities held throughout 2025 were as follows:

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
***Friday Banking* pada 20 Juni 2025 yang memperkenalkan program dan produk unggulan Bank.** **Friday Banking on 20 June 2025, introducing the Bank's flagship programs and products.**	Le Victoria Hang Tuah	Nasabah Cabang BIP dan Undangan BIP Branch Customers and Invitees
***Friday Banking* pada 18 Juli 2025 dengan tema "Energi Saving *for Home and Office*".** Friday Banking on 18 July 2025, with the theme "Energy Saving for Home and Office".	Le Victoria Hang Tuah	Nasabah Cabang dan Undangan Branch Customers and Invitees
***Friday Banking* pada 25 Juli 2025 dengan tema "*Make It Make Cents*".** Friday Banking on 25 July 2025, with the theme "Make It Make Cents".	Le Victoria Hang Tuah	Undangan Vendor Brauss Brauss Vendor Invitees
***Friday Banking* pada 1 Agustus 2025 dengan tema "Bank Victoria *Payroll Benefit*".** Friday Banking on 1 August 2025, with the theme "Bank Victoria Payroll Benefit".	Le Victoria Hang Tuah	Nasabah Cabang Area Cideng dan Undangan Cideng Area Branch Customers and Invitees
***Friday Banking* pada 8 Agustus 2025 diselenggarakan bekerja sama dengan RS Bethsaida dengan tema "Waspada Bahaya Varises dan Penyakit Pembuluh Darah".** Friday Banking on 8 August 2025, held in collaboration with Bethsaida Hospital, with the theme "Beware of the Dangers of Varicose Veins and Blood Vessel Disease".	Le Victoria Hang Tuah	Nasabah Cabang dan Undangan Branch Customers and Invitees
***Friday Banking* pada 15 Agustus 2025 diselenggarakan bekerja sama dengan BNI Life dan Rumah Sakit EMC dengan tema "Mencegah Cedera Saat Lari".** Friday Banking on 15 August 2025, held in collaboration with BNI Life and EMC Hospital, with the theme "Preventing Injuries While Running".	Le Victoria Hang Tuah	Nasabah Cabang dan Undangan Branch Customers and Invitees

Kegiatan Activity	Lokasi Location	Penerima Manfaat Beneficiaries (Orang / People)
Friday Banking **pada 22 Agustus 2025 diselenggarakan bekerja sama dengan Stellar Women dengan tema "*Entrepreneurs VS Artificial Intelligence (AI)*".** Friday Banking on 22 August 2025, held in collaboration with Stellar Women, with the theme "Entrepreneurs VS Artificial Intelligence (AI)".	Le Victoria Hang Tuah	Undangan Vendor Brauss Brauss Vendor Invitees
Friday Banking **pada 12 September 2025 diselenggarakan bekerja sama dengan Muslimverse dengan tema "*Swipe Right to Jannah: Find Love, Find Faith, Find Forever*".** Friday Banking on 12 September 2025, held in collaboration with Muslimverse, with the theme "Swipe Right to Jannah: Find Love, Find Faith, Find Forever".	Le Victoria Hang Tuah	Undangan Vendor Brauss Brauss Vendor Invitees
Friday Banking **pada 19 September 2025 diselenggarakan bekerja sama dengan Victoria Manajemen Investasi dengan tema "Ketidakpastian Global: Instrumen Investasi Stabil dan Likuid".** Friday Banking on 19 September 2025, held in collaboration with Victoria Manajemen Investasi, with the theme "Global Uncertainty: Stable and Liquid Investment Instruments".	Le Victoria Hang Tuah	Nasabah Cabang Area Fatmawati dan Undangan Fatmawati Area Branch Customers and Invitees
Friday Banking **pada 24 Oktober 2025 dengan tema "*Gerd Symptoms Cause and Treatment a Comperehensive Talk About Gerd*".** Friday Banking on 24 October 2025 with the theme "GERD Symptom, Cause, and Treatment: A Comprehensive Talk About GERD".	Le Victoria Hang Tuah	Nasabah Cabang dan Undangan Branch Customers and Invitees
Friday Banking **pada 31 Oktober 2025 diselenggarakan bekerja sama dengan Indonesia Commodity & Derivatives Exchange (ICDX), Asosiasi Pialang Berjangka Indonesia (ASPEBTINDO), dan Badan Arbitrase Perdagangan Berjangka Komoditi (Bakti) dengan tema "Diskusi Kepatuhan: Penanganan Pengaduan Nasabah Perdagangan Berjangka Komoditi (PBK)".** Friday Banking on 31 October 2025, held in collaboration with the Indonesia Commodity & Derivatives Exchange (ICDX), the Indonesian Futures Brokers Association (ASPEBTINDO), and the Commodity Futures Trading Arbitration Board (Bakti), with the theme "Compliance Discussion: Handling Customer Complaints in Commodity Futures Trading (PBK)".	Le Victoria Hang Tuah	Nasabah Cabang dan Undangan Branch Customers and Invitees
Friday Banking **pada 14 November 2025 diselenggarakan bekerja sama dengan Yayasan Lions Indonesia dengan tema "Kerja Sama Pembukaan Rekening Bank Victoria dengan Lions Club 307-A1".** Friday Banking on 14 November 2025, held in collaboration with Lions Indonesia Foundation with the theme "Cooperation in Opening Bank Victoria Accounts with Lions Club 307-A1".	Le Victoria Hang Tuah	Nasabah Cabang dan Undangan Branch Customers and Invitees
Friday Banking **pada 28 November 2025 diselenggarakan bekerja sama dengan *Make A Wish* dengan tema "*The Power of A Wish*: Kekuatan dari Sebuah Harapan".** Friday Banking on 28 November 2025, held in collaboration with Make A Wish, with the theme "The Power of A Wish: The Strength of Hope".	Le Victoria Hang Tuah	Nasabah Cabang Pondok Indah dan Undangan Pondok Indah Branch Customers and Invitees

Biaya Program *Friday Banking*

Pada tahun 2025, Bank Victoria menyalurkan dana untuk mendukung program *Friday Banking* dengan alokasi biaya sebesar Rp107.348.194,-.

Program Magang Internasional untuk Mahasiswa Asing [POJK F.25]

Sebagai upaya memperluas kontribusi dalam dunia pendidikan serta mendorong pertukaran pengetahuan lintas budaya, Bank Victoria menyelenggarakan program magang internasional yang terbuka bagi mahasiswa dari berbagai negara. Pada tahun 2025, Bank menerima 4 (empat) peserta magang yang ditempatkan di beberapa Divisi meliputi Kantor Cabang KCU BIP, *Compliance, System Procedure & Coordinator Customer Protection, Risk Management, Treasury*, SKAI, *Anti-Fraud, SME & Consumer Banking*, dan *Accounting* untuk memperoleh pengalaman langsung terkait praktik industri perbankan di Indonesia. Program ini tidak hanya memberikan pembelajaran praktis dan keterampilan profesional bagi peserta, tetapi juga menjadi sarana untuk mempererat hubungan antarbangsa melalui kolaborasi di bidang pendidikan. Inisiatif ini sejalan dengan komitmen Bank dalam mendukung pengembangan kapasitas generasi muda serta kontribusi terhadap tujuan pembangunan berkelanjutan, khususnya pada sektor pendidikan dan peningkatan kualitas HC global.

Dampak Operasi terhadap Masyarakat Sekitar [POJK F.23]

Keberadaan Bank Victoria di tengah masyarakat membawa lebih banyak dampak positif dibandingkan potensi risiko yang mungkin timbul. Dari sisi manfaat, Bank berperan aktif mendorong pertumbuhan ekonomi lokal melalui penciptaan lapangan kerja, peluang usaha bagi pemasok atau mitra lokal, serta penyediaan produk dan layanan keuangan yang mendukung peningkatan inklusi keuangan. Selain itu, berbagai program CSR yang dijalankan Bank turut memperkuat kesejahteraan masyarakat, khususnya di bidang pendidikan, kesehatan, dan lingkungan.

Di sisi lain, Bank juga menyadari bahwa setiap aktivitas operasional berpotensi menimbulkan dampak negatif, misalnya peningkatan lalu lintas di sekitar kantor, penggunaan sumber daya yang intensif, atau risiko lingkungan akibat aktivitas operasional. Untuk itu, Bank menerapkan langkah mitigasi yang terukur, seperti pengelolaan sumber daya secara efisien, penerapan prinsip ramah lingkungan dalam operasional, serta menjaga komunikasi terbuka dengan masyarakat untuk menampung aspirasi dan keluhan.

Cost of Friday Banking Program

In 2025, Bank Victoria allocated funds to support Friday Banking program, with a budget of Rp107,348,194.

International Internship Program for Foreign Students [POJK F.25]

As an effort to expand contribution to education and encourage cross-cultural knowledge exchange, Bank Victoria holds an international internship program open to students from various countries. In 2025, the Bank accepted 4 (four) interns who were placed in several Divisions, including KCU BIP Branch Office, Compliance, System Procedure & Customer Protection Coordinator, Risk Management, Treasury, SKAI, Anti-Fraud, SME & Consumer Banking, and Accounting, to obtain hands-on experiences in banking industry in Indonesia. This program not only provides practical learning and professional skills for participants, but also serves as a platform to strengthen international ties through collaboration in education. This initiative is in line with the Bank's commitment to supporting capacity development of younger generation and contributing to sustainable development goals, particularly in education sector and improving the quality of global HC.

Impact of Operations on Surrounding Community [POJK F.23]

Bank Victoria's presence in the community brings more positive impacts than the potential risks that may arise. In terms of benefits, the Bank plays an active role in promoting local economic growth by creating employment opportunity, business opportunities for local suppliers or partners, and providing financial products and services that support increased financial inclusion. Furthermore, various CSR programs carried out by the Bank contribute to strengthening community welfare, particularly in education, health, and the environment.

On the other side, the Bank realizes that every operational activity has the potential to generate negative impacts, such as increased traffic around offices, intensive use of resources, or environmental risks resulting from operational activities. To this end, the Bank implements measurable mitigation measures, such as efficient resource management, applies environmentally friendly principles in operations, and maintains open communication with the community to accommodate aspirations and complaints.

Dengan pendekatan tersebut, Bank Victoria memastikan bahwa keberadaannya tidak hanya memberikan nilai ekonomi, tetapi juga menciptakan hubungan yang harmonis, berkelanjutan, dan saling menguntungkan bagi masyarakat sekitar.

Sarana Pengaduan Masyarakat [POJK F.24]

Bank Victoria menyediakan saluran khusus untuk menerima masukan maupun pengaduan terkait pelaksanaan program CSR. Mekanisme ini dapat diakses melalui *Call Center* (1500977) yang beroperasi penuh waktu, alamat email resmi Bank (customercare@victoriabank.co.id), maupun layanan *Customer Service* di seluruh kantor cabang. Seluruh laporan yang diterima akan dicatat, ditindaklanjuti secara transparan, serta dilaporkan secara berkala ke kantor pusat untuk memastikan setiap isu dapat diselesaikan dengan objektif dan tanpa diskriminasi.

Dalam periode 3 (tiga) tahun terakhir, Bank tidak menerima pengaduan yang berkaitan dengan kegiatan CSR yang telah dilaksanakan.

Rantai Pasok yang Bertanggung Jawab

Bank Victoria menempatkan pengelolaan rantai pasok sebagai bagian integral dari penerapan keberlanjutan. Dalam membangun hubungan dengan mitra usaha, Bank menerapkan proses seleksi yang ketat untuk memastikan hanya bermitra dengan pihak yang mematuhi ketentuan hukum, etika bisnis, serta prinsip GCG. Selain itu, Bank juga mendorong mitra untuk memperhatikan aspek lingkungan, sosial, dan hak asasi manusia dalam setiap kegiatan operasionalnya.

Sebagai bentuk pengendalian, Bank melaksanakan pemantauan dan evaluasi secara berkala guna memastikan kepatuhan mitra terhadap standar yang telah ditetapkan. Upaya ini tidak hanya ditujukan untuk menjaga kualitas layanan dan mengurangi risiko operasional, tetapi juga untuk memperkuat kemitraan jangka panjang yang sejalan dengan prinsip keberlanjutan. Melalui pendekatan tersebut, Bank Victoria berkomitmen untuk membangun ekosistem rantai pasok yang bertanggung jawab, transparan, dan berkontribusi terhadap pencapaian tujuan pembangunan berkelanjutan.

With such approach, Bank Victoria ensures that its presence not only provides economic value but also creates harmonious, sustainable, and mutually beneficial relationships with the surrounding community.

Community Complaint Channel [POJK F.24]

Bank Victoria provides a dedicated channel for receiving input and complaints regarding the implementation of its CSR programs. This mechanism is accessible through Call Center (1500977), the Bank's official email address (customercare@victoriabank.co.id), or Customer Service at all branch offices. All reports received will be recorded, followed up transparently, and reported periodically to head office to ensure that every issue is resolved objectively and without discrimination.

In the past 3 (three) years, the Bank did not receive any complaints related to CSR activities that were carried out.

Responsible Supply Chain

Bank Victoria places supply chain management as an integral part of its sustainability implementation. In building relationships with business partners, the Bank implements a rigorous selection process to ensure partnerships are only formed with parties that comply with legal requirements, business ethics, and GCG principles. Furthermore, the Bank encourages partners to consider environmental, social, and human rights aspects in all their operations.

As a form of control, the Bank conducts regular monitoring and evaluation to ensure partners' compliance with the established standards. These efforts are aimed not only at maintaining service quality and mitigating operational risks but also at strengthening long-term partnerships in line with sustainability principles. Through such approach, Bank Victoria is committed to building a supply chain ecosystem that is responsible, transparent, and contributes to the achievement of sustainable development goals.

Keberlanjutan Kinerja Lingkungan Hidup
Environmental Performance Sustainability



Kegiatan Usaha Berwawasan Lingkungan

Bank Victoria menegaskan komitmen dalam mendukung aktivitas usaha yang berorientasi pada keberlanjutan dengan menyalurkan pembiayaan kepada sektor-sektor yang mengedepankan praktik ramah lingkungan, tanggung jawab sosial, serta tata kelola yang baik. Melalui penyaluran kredit tersebut, Bank berperan aktif dalam mendorong pertumbuhan bisnis yang berkesinambungan sekaligus memberikan nilai tambah bagi masyarakat dan lingkungan. Bank Victoria meyakini bahwa investasi pada sektor berkelanjutan merupakan strategi penting untuk menciptakan pertumbuhan ekonomi yang inklusif dan berjangka panjang.

Environmentally-Friendly Business Activities

Bank Victoria affirms its commitment to supporting sustainability-oriented business activities by channeling financing to sectors that prioritize environmentally friendly practices, social responsibility, and good governance. Through this lending, the Bank plays an active role in promoting sustainable business growth while providing added value to the community and environment. Bank Victoria believes that investing in sustainable sector is a crucial strategy for creating inclusive and long-term economic growth.

Pembiayaan dengan Pertimbangan Aspek Lingkungan Hidup

Sebagai bagian dari komitmen terhadap prinsip keuangan berkelanjutan, Bank menetapkan kewajiban kepemilikan dokumen Analisis Mengenai Dampak Lingkungan (AMDAL)

Financing by Considering the Environmental Aspect

As part of the commitment to sustainable finance principles, the Bank requires every (potential) debtor managing land with a minimum area of 25 hectares to have

bagi setiap (calon) debitur yang mengelola lahan dengan luas minimal 25 hektare. Ketentuan ini tertuang dalam Keputusan Direksi No. 006/SK-DIR/12/25 tanggal 11 Desember 2025 tentang Standar Operasional Prosedur Perkreditan *Commercial Banking* dan SME PT Bank Victoria International Tbk. Melalui AMDAL, Bank dapat menilai potensi dampak lingkungan dari kegiatan usaha, memastikan kepatuhan terhadap praktik berkelanjutan, serta menyalurkan pembiayaan hanya kepada debitur yang memenuhi kriteria lingkungan. Informasi terkait penyaluran kredit dengan memperhatikan aspek lingkungan dalam 3 (tiga) tahun terakhir disajikan sebagai berikut:

an Environmental Impact Analysis (AMDAL) document. This regulation is stated in the Board of Directors' Decision Letter No. 006/SK-DIR/12/25 dated 11 December 2025 on Standard Operating Procedures for Commercial Banking and SME Credit at PT Bank Victoria International Tbk. Through AMDAL, the Bank can assess the potential environmental impacts of its business activities, ensure compliance with sustainable practices, and provide financing only to debtors who fulfill the environmental criteria. Information on lending with due regard to environmental aspect in the past 3 (three) years is presented as follows:

(dalam juta Rupiah / in million Rupiah)

Indikator Indicator	2025	2024	2023
PT Ungaran Sari Garment	**79,059**	72,427	59,269
PT IGP International	**99,465**	73,711	81,667
PT Pratama Unggul S	**-**	42,480	23,233
PT Kwala Gunung	**-**	123,747	118,921
PT Sweet Greens Indonesia	**58,248**	81,345	47,783
PT Mitra Niaga Cornindo	**-**	-	21,753
PT Mitra Sewatama Raya	**-**	-	11,871
PT Gaharu	**58,400**	59,900	68,541
PT Bina Mitra Makmur	**77,500**	107,375	137,376
PT Samudera Parama Avirodha	**6,876**	25,497	28,889
Henry Maknawi	**47,204**	15,482	23,928
Total	**426,752**	**601,964**	**623,231**

Penggunaan Material yang Ramah Lingkungan [POJK F.5]

Dalam menjalankan kegiatan operasional, Bank Victoria tidak banyak menggunakan bahan baku selain kebutuhan administrasi dan perkantoran. Kendati demikian, Bank tetap berkomitmen mengutamakan pemakaian material ramah lingkungan dalam setiap perlengkapan kerja. Sebagai bagian dari tanggung jawab lingkungan, karyawan juga didorong untuk mengurangi konsumsi produk sekali pakai yang sulit didaur ulang, sehingga dapat menekan volume sampah yang berakhir di tempat pembuangan akhir. Untuk mendukung upaya tersebut, Bank menerapkan sejumlah inisiatif, antara lain:

1. Mengganti air minum kemasan dengan penyediaan gelas atau tumbler untuk mengurangi penggunaan plastik sekali pakai.
2. Memanfaatkan kertas bekas sesuai kebutuhan dan memaksimalkan penyimpanan dokumen secara digital untuk mengurangi penggunaan kertas.
3. Menggunakan kantong atau *goodie bag* ramah lingkungan dalam berbagai acara dan sebagai *merchandise* atau barang promosi kepada nasabah.

Use of Environmentally Friendly Material [POJK F.5]

In carrying out operational activities, Bank Victoria uses minimal raw materials, except for administrative and office purposes. Nevertheless, the Bank remains committed to prioritizing the use of environmentally friendly materials in all work equipment. As part of environmental responsibility, employees are also encouraged to reduce the consumption of single-use products difficult to recycle, thereby reducing the volume of waste ending up in landfills. To support such efforts, the Bank implements a number of initiatives, including:

1. Replacing bottled drinking water with the provision of glasses or tumblers to reduce the use of single-use plastics.
2. Utilizing used paper as needed and maximizing digital document storage to reduce paper use.
3. Using environmentally friendly bag or goodie bag in various events and as merchandise or promotional items for customers.

Efisiensi Penggunaan Energi [POJK F.6] [POJK F.7] [E-03]

Untuk mendukung kelancaran operasional perbankan, Bank Victoria memenuhi kebutuhan energi dari 2 (dua) sumber utama, yakni Bahan Bakar Minyak (BBM) dan listrik. BBM diperoleh dari Stasiun Pengisian Bahan Bakar Umum (SPBU) terdekat dan digunakan bagi kendaraan operasional serta sebagai bahan bakar genset ketika terjadi pemadaman listrik. Sementara itu, kebutuhan listrik dipasok oleh Perusahaan Listrik Negara (PT PLN) dan digunakan untuk menjalankan berbagai perangkat kantor, seperti komputer, sistem pencahayaan, pendingin ruangan, serta peralatan elektronik lainnya.

Pasokan listrik dari PLN dikategorikan sebagai konsumsi energi tidak langsung, karena bersumber dari pihak ketiga dan bukan dihasilkan sendiri oleh Bank. Hingga saat ini, Bank Victoria belum menggunakan energi terbarukan secara langsung, seperti pembangkit listrik tenaga surya, mengingat pertimbangan efisiensi, kepraktisan, serta kebutuhan operasional yang harus selalu terjamin. Namun demikian, Bank telah menunjukkan komitmen nyata terhadap keberlanjutan dengan berpartisipasi aktif dalam inisiatif *Renewable Energy Certificate* (REC) Indonesia.

Melalui partisipasi tersebut, Bank Victoria mendukung percepatan transisi energi bersih di Indonesia sekaligus mengurangi jejak karbon dari konsumsi listrik operasional. Atas langkah proaktif ini, Bank Victoria memperoleh penghargaan sebagai "*Pioneers of the Indonesia Renewable Energy Certificate*", yang menjadi pengakuan atas peran Bank dalam mendorong pemanfaatan energi hijau di sektor perbankan nasional.

Penghargaan ini semakin menegaskan komitmen Bank Victoria untuk tidak hanya berfokus pada kinerja finansial, tetapi juga memberikan kontribusi positif terhadap agenda global pengendalian perubahan iklim serta pembangunan berkelanjutan di Indonesia.

Using Energy Efficiently [POJK F.6] [POJK F.7] [E-03]

To support smooth banking operations, Bank Victoria meets its energy needs from 2 (two) main sources: Fuel and electricity. Fuel is obtained from the nearest gas station and utilized for operational vehicles and as generator fuel during power outages. Meanwhile, electricity is supplied by the State Electricity Company (PT PLN) and utilized to run various office equipment, such as computers, lighting systems, air conditioners, and other electronic devices.

The electricity supplied by PLN is categorized as indirect energy consumption as it is sourced from a third party and not generated by the Bank itself. To date, Bank Victoria has not directly utilized renewable energy, such as solar power plants, due to considerations of efficiency, practicality, and the need for operational assurance. Nevertheless, the Bank has demonstrated a clear commitment to sustainability by actively participating in Indonesia Renewable Energy Certificate (REC) initiative.

Through this participation, Bank Victoria supports the acceleration of clean energy transition in Indonesia while reducing carbon footprint of operational electricity consumption. For this proactive approach, Bank Victoria received the "Pioneers of the Indonesia Renewable Energy Certificate" award, recognizing the Bank's role in promoting the use of green energy in national banking sector.

This award further affirms Bank Victoria's commitment to focusing not only on financial performance but also on making positive contribution to the global agenda of climate change control and sustainable development in Indonesia.

Informasi terkait konsumsi energi Bank Victoria selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

Information on Bank Victoria's energy consumption over the past 3 (three) years is presented as follows:

Uraian	Satuan Unit	2025	2024	2023	Description
Listrik	GJ	**3,925.84**	4,914.20	4,774.83	Electricity
	J	**3,925,840,000,000**	4,914,200,000,000	4,774,830,000,000	
BBM*	GJ	**2,301.31**	2,353.97	2,262.32	Fuel*
Total	**GJ**	**6,227.15**	**7,268.17**	**7,037.15**	**Total**
Intensitas Penggunaan Energi	**GJ/Juta Rupiah** GJ/Million Rupiah	**0.00270**	**0.00350**	**0.00383**	**Intensity of Energy Use**
Capaian Efisiensi Energi	**GJ/Juta Rp** GJ/Million Rupiah	**0.00080**	**0.00033**	**0.00064**	**Achievement of Energy Efficiency**

* Bahan bakar yang digunakan untuk kendaraan merupakan jenis *Pertalite.* / The fuel used for vehicles is the Pertalite type.

Sementara itu, rincian konsumsi energi listrik yang digunakan dalam operasional Bank disajikan secara terperinci menurut jenis pemakaiannya sebagai berikut:

Meanwhile, a breakdown of electricity consumption utilized in the Bank's operations is presented in detail based on its type of use as follows:

Uraian	Satuan Unit	2025	2024	Description
Energi yang Dikonsumsi secara Langsung	kWh	**1,090,510.10**	1,365,056.83	Directly Consumed Energy
Energi yang Dikonsumsi secara Tidak Langsung	kWh	**-**	-	Indirectly Consumed Energy
Total Konsumsi Energi Listrik	**kWh**	**1,090,510.10**	**1,365,056.83**	**Total Electrical Energy Consumption**

Penggunaan energi menjadi salah satu faktor utama penyumbang emisi gas rumah kaca (GRK) yang berdampak pada perubahan iklim. Menyadari hal tersebut, Bank berkomitmen untuk menerapkan langkah-langkah penghematan energi di berbagai aspek operasional. Upaya ini tidak hanya mendukung pengendalian perubahan iklim, tetapi juga memberikan efisiensi biaya bagi perusahaan. Sejumlah inisiatif efisiensi energi yang telah dijalankan Bank meliputi:

1. Mematikan perangkat elektronik, lampu, dan pendingin ruangan ketika tidak digunakan.
2. Mengganti lampu konvensional dengan lampu LED yang lebih hemat energi.
3. Mengurangi frekuensi pertemuan tatap muka dengan memanfaatkan rapat daring guna menekan konsumsi bahan bakar kendaraan.

Energy use is one main factor contributing to greenhouse gas (GHG) emissions that affects climate change. Recognizing such matter, the Bank is committed to implementing energy-saving measures across various operational aspects. These efforts not only support climate change control but also provide cost efficiency for the Company. Several energy efficiency initiatives carried out by the Bank include:

1. Turn off electronic devices, lights, and air conditioners when not in use.
2. Replace conventional lamps with more energy-saving LED lamps.
3. Reduce the frequency of face-to-face meetings by utilizing online meetings to reduce fuel consumption for vehicle.

Efisiensi Penggunaan Air
[POJK F.8] [E-04]

Air merupakan sumber daya yang mendukung kelancaran operasional harian Bank. Kebutuhan air dipasok melalui Perusahaan Daerah Air Minum (PDAM) dan digunakan untuk berbagai keperluan, mulai dari sanitasi hingga kebutuhan rumah tangga perkantoran. Dalam pemanfaatannya, Bank mendorong seluruh karyawan untuk menggunakan air secara bijak dan efisien. Komitmen ini diwujudkan melalui sejumlah inisiatif, antara lain:

1. Pemasangan sensor otomatis pada keran guna mengoptimalkan penggunaan air.
2. Peningkatan kesadaran karyawan mengenai pentingnya penghematan air melalui media sosialisasi seperti brosur dan pesan imbauan di area sumber air.
3. Pelaksanaan pemeriksaan berkala terhadap keran, *shower*, toilet, serta meteran air untuk mendeteksi potensi kerusakan atau kebocoran sejak dini.

Informasi mengenai penggunaan dan efisiensi air Bank selama 3 (tiga) tahun terakhir disajikan sebagai berikut:

Using Water Efficiently [POJK F.8] [E-04]

Water is a resource that supports the smooth running of the Bank's daily operations. Water is supplied through the Regional Drinking Water Company (PDAM) and used for various purposes, from sanitation to household and office needs. In utilizing water, the Bank encourages all employees to use it wisely and efficiently. This commitment is demonstrated through several initiatives, including:

1. Installation of automatic sensor on faucet to optimize water use.
2. Increased employee awareness of the importance of saving water through social media such as brochures and appeals at water source areas.
3. Periodic check of taps, showers, toilets, and water meters to early detect potential damage or leaks.

Information on the Bank's water use and efficiency over the past 3 (three) years is presented below:

Uraian	Satuan Unit	2025	2024	2023	Description
Air	m^3	**20,525.30**	20,080.38	18,746.74	Water
Intensitas Penggunaan Air terhadap Pendapatan Operasional	**m^3/Juta Rupiah** **m^3/Million Rupiah**	**0.00891**	**0.00967**	**0.01021**	**Intensity of Water Use to Operating Income**
Capaian Penghematan Air	**m^3/Juta Rupiah** **m^3/Million Rupiah**	**0.00076**	**0.00054**	**(0.00685)**	**Achievement of Water Saving**

Pengelolaan Limbah [POJK F.13] [POJK F.14] [POJK F.15] [E-05]

Aktivitas operasional Bank secara langsung menghasilkan berbagai jenis limbah, baik organik maupun anorganik, dengan porsi terbesar berupa kertas. Bank mencatat bahwa limbah kertas yang dihasilkan mencapai 4 ton pada tahun 2025.

Dalam pengelolaannya, Bank menerapkan prinsip *reduce, reuse, recycle* (3R) melalui berbagai langkah, seperti menekan penggunaan kertas dengan digitalisasi proses kerja, memanfaatkan kertas bekas untuk kebutuhan internal, serta mendaur ulang limbah kertas melalui kerja sama dengan pengelola gedung.

Waste Management [POJK F.13] [POJK F.14] [POJK F.15] [E-05]

The Bank's operational activities directly generated various types of waste, both organic and inorganic, with the largest portion was paper. The Bank recorded that the paper waste generated reached 4 tons in 2025.

In its management, the Bank applies the principles of reduce, reuse, recycle (3R) through various steps, such as reducing paper use by digitizing work processes, utilizing used paper for internal needs, and recycling paper waste through cooperation with building managers.

Ke depan, Bank Victoria berkomitmen memperluas cakupan pengelolaan limbah tidak hanya pada kertas, tetapi juga jenis limbah lainnya. Upaya ini menjadi bagian dari tanggung jawab perusahaan untuk memastikan operasional yang lebih efisien, ramah lingkungan, dan sejalan dengan prinsip keberlanjutan.

Tumpahan yang Terjadi

Sepanjang tahun 2025, kegiatan operasional Bank berlangsung tanpa adanya insiden tumpahan limbah yang berpotensi menimbulkan dampak terhadap lingkungan.

Keanekaragaman Hayati [POJK F.9] [POJK F.10]

Lokasi operasional Bank berada di area yang tidak berdekatan dengan kawasan lindung maupun wilayah dengan tingkat keanekaragaman hayati tinggi, sehingga kegiatan usaha Bank tidak menimbulkan dampak langsung terhadap ekosistem tersebut. Kendati demikian, sebagai bentuk kepedulian terhadap lingkungan, Bank turut berkontribusi dalam menciptakan ruang hijau dengan menempatkan pot tanaman di sekitar area kantor melalui kerja sama dengan pengelola gedung.

Pengendalian Emisi [POJK F.11] [POJK F.12] [E-01] [E-02]

Kegiatan operasional yang menggunakan energi berkontribusi terhadap timbulnya emisi, yang merupakan salah satu faktor penyebab GRK dan perubahan iklim. Menyadari hal tersebut, Bank mengambil langkah-langkah pengendalian emisi melalui berbagai inisiatif, antara lain:

1. Menempatkan tanaman hias di area kantor untuk membantu meningkatkan kualitas udara.
2. Menerapkan kebijakan hemat energi guna menekan konsumsi listrik.
3. Mengurangi perjalanan dinas dengan memanfaatkan platform rapat daring serta mengoptimalkan penggunaan kendaraan untuk perjalanan luar kota.
4. Berpartisipasi aktif dalam inisiatif *Renewable Energy Certificate* (REC) Indonesia.

Melalui upaya tersebut, Bank berkomitmen untuk menekan dampak lingkungan dari aktivitas operasional sekaligus mendukung tercapainya keberlanjutan. Informasi terkait jumlah emisi yang dihasilkan Bank dalam 3 (tiga) tahun terakhir disajikan sebagai berikut:

Going forward, Bank Victoria is committed to expanding its waste management coverage beyond paper to include other types of waste. This effort is part of the Company's responsibility to ensure a more efficient and environmentally friendly operation in line with sustainability principles.

Spills

Throughout 2025, the Bank's operations were free from any waste spills that could potentially impact the environment.

Biodiversity [POJK F.9] [POJK F.10]

The Bank's operational locations are not adjacent to protected areas or areas with high biodiversity, so that its business activities do not have direct impact on these ecosystems. Nevertheless, as a form of concern for the environment, the Bank contributes to creating green spaces by placing plant pots around the office area in cooperation with building managers.

Emission Control [POJK F.11] [POJK F.12] [E-01] [E-02]

Operational activities that use energy contribute to emissions, which are a contributing factor to greenhouse gas emissions and climate change. Recognizing such matter, the Bank has taken steps to control emissions through various initiatives, including:

1. Placing ornamental plants in office areas to help increase the quality of air.
2. Implementing energy-saving policies to reduce electricity consumption.
3. Reducing business trip by utilizing online meeting platforms and optimizing vehicle use for trip out of town.
4. Actively participating in Indonesia Renewable Energy Certificate (REC) initiative.

Through these efforts, the Bank is committed to reducing the environmental impact of its operational activities while supporting sustainability. Information on the Bank's emissions over the past 3 (three) years is presented as follows:

Uraian		2025	2024	2023	Description	
		Ton CO_2eq				
Lingkup 1	Operasional Utama (Bahan Bakar)	**154.33**	157.84	151.70	Main Operation (Fuel)	Scope 1
Lingkup 2	Listrik yang Dibeli	**1,025.08**	1,283.15	1,246.76	Electricity Purchased	Scope 2
Sub Total		**1,179.41**	**1,440.99**	**1,398.46**		**Sub Total**
REC		**(3.78)**	**-**	**-**		**REC**
Total Emisi		**1,175.63**	**1,440.99**	**1,398.46**		**Total Emissions**
Intensitas Emisi (Ton CO_2eq/Juta Rp)		**0.00051**	**0.00069**	**0.00076**		**Emission Intensity (Ton CO_2eq/Million Rp)**
Capaian Efisiensi Emisi (Ton CO_2eq/Juta Rp)		**0.0002**	**0.00007**	**0.00007**		**Achievement of Emission Efficiency (Ton CO_2eq/Million Rp)**

Tabel berikut menampilkan data penggunaan energi pada setiap lingkup emisi di Bank yang telah disusun sesuai dengan standar ESG IDX:

The following table displays energy use data for each emission area at the Bank, compiled in accordance with IDX ESG standards:

Uraian	Satuan Unit	2025	2024	Description
Kategori 1: Emisi GRK Langsung dan Pembuangan **Category 1: Direct GHG Emissions and Removals**				
Emisi Langsung dari Pembakaran Stasioner	Ton CO_2eq	**-**	-	Direct Emissions from Stationary Combustion
Emisi Langsung dari Pembakaran Bergerak	Ton CO_2eq	**154.33**	157.84	Direct Emissions from Mobile Combustion
Emisi Langsung dari Proses Pengolahan	Ton CO_2eq	**-**	-	Direct Emissions from Processes
Emisi *Fugitive* Langsung	Ton CO_2eq	**-**	-	Direct Fugitive Emissions
Emisi Langsung dari *Land Use, Land Use Change and Forestry* (LULUCF)	Ton CO_2eq	**-**	-	Direct Emissions from Land Use, Land Use Change, and Forestry (LULUCF)
Total Emisi Langsung (*Scope* 1)	**Ton CO_2eq**	**154.33**	157.84	**Total Direct Emissions (Scope 1)**
Kategori 2: Emisi GRK Tidak Langsung dari Energi yang Diimpor/Dibeli **Category 2: Indirect GHG Emissions from Imported/Purchased Energy**				
Emisi Tidak Langsung dari Konsumsi Listrik yang Diimpor/Dibeli	Ton CO_2eq	**1,025.08**	1,283.15	Indirect Emissions from Imported/Purchased Electricity Consumption
Emisi Tidak Langsung dari Konsumsi Jaringan Energi yang Diimpor/Dibeli (Diluar Listrik)	Ton CO_2eq	**-**	-	Indirect Emissions from Imported/Purchased Network Energy Consumption (Excluding Electricity)
Total Emisi Tidak Langsung (*Scope* 2)	**Ton CO_2eq**	**1,025.08**	1,283.15	**Total Indirect Emissions (Scope 2)**
Kategori 3: Emisi GRK Tidak Langsung dari Transportasi **Category 3: Indirect GHG Emissions from Transportation**				
Transportasi dan Distribusi Hulu	Ton CO_2eq	**-**	**-**	Upstream Transportation and Distribution
Perjalanan Dinas	Ton CO_2eq	**-**	**-**	Business Trip
Transportasi dari Klien dan Pengunjung	Ton CO_2eq	**-**	**-**	Transportation of Clients and Visitors
Transportasi dan Distribusi Hilir	Ton CO_2eq	**-**	**-**	Downstream Transportation and Distribution
Perjalanan Karyawan	Ton CO_2eq	**-**	**-**	Employee Commuting
Kategori 4: Emisi GRK Tidak Langsung dari Produk yang Digunakan Perusahaan **Category 4: Indirect GHG Emissions from Products Used by Company**				
Kegiatan yang Berhubungan dengan Energi yang Tidak Termasuk dalam Emisi Langsung dan Emisi Energi Tidak Langsung	Ton CO_2eq	**-**	**-**	Energy-Related Activities Not Included in Direct Emissions and Indirect Energy Emissions
Pembelian Barang dan Jasa	Ton CO_2eq	**-**	**-**	Purchased Goods and Services
Capital Equipment/Goods	Ton CO_2eq	**-**	**-**	Capital Equipment/Goods

Uraian	Satuan Unit	2025	2024	Description
Limbah yang Dihasilkan dalam Kegiatan Operasional	Ton CO_2eq	-	-	Waste Generated in Operations
Aset Sewaan Hulu	Ton CO_2eq	-	-	Upstream Leased Assets
Kategori 5: Emisi GRK Tidak Langsung yang terkait dengan Penggunaan Produk dari Perusahaan **Category 5: Indirect GHG Emissions Associated with the Use of the Company's Products**				
Investasi	Ton CO_2eq	-	-	Investments
Penggunaan Produk yang Dijual	Ton CO_2eq	-	-	Use of Products Sold
Pembuangan Akhir Masa Pakai Produk yang Dijual	Ton CO_2eq	-	-	End-of-Life Removals of Products Sold
Waralaba Hilir	Ton CO_2eq	-	-	Downstream Franchises
Aset Sewaan Hilir	Ton CO_2eq	-	-	Downstream Leased Assets
Pengolahan Produk yang Dijual	Ton CO_2eq	-	-	Processing of Products Sold
Kategori 6: Emisi GRK Tidak Langsung dari Sumber Lainnya **Category 6: Indirect GHG Emissions from Other Sources**				
Emisi atau Pembuangan Tidak Langsung Lainnya	Ton CO_2eq	-	-	Other Indirect Emissions or Removals
Total Emisi Tidak Langsung (*Scope* 3)	**Ton CO_2eq**	-	-	**Total Indirect Emissions (Scope 3)**
Total Emisi GRK (*Scope* 1 dan 2)	**Ton CO_2eq**	**1,179.41**	**1,440.99**	**Total GHG Emissions (Scope 1 and 2)**
Total Emisi GRK (*Scope* 1, 2, dan 3)	**Ton CO_2eq**	**1,179.41**	**1,440.99**	**Total GHG Emissions (Scope 1, 2, and 3)**
Offsets/Credits	**Ton CO_2eq**	-	-	**Offsets/Credits**
Pembelian *Renewable Energy Certificate* (REC)	**kWh**	**4,016**	-	**Purchase of Renewable Energy Certificate (REC)**
Intensitas Emisi GRK (*Scope* 1 dan 2)	**Ton CO_2eq/ Juta Rupiah** Ton CO_2eq/ Million Rupiah	**0.00051**	**0.00069**	**GHG Emissions Intensity (Scope 1 and 2)**

Komitmen untuk Mengurangi Emisi Gas Rumah Kaca [E-06] [E-07]

Bank Victoria berkomitmen untuk mendukung agenda global pengendalian perubahan iklim melalui upaya penurunan emisi GRK. Untuk memastikan langkah ini berjalan efektif, Bank membentuk sistem manajemen khusus yang berfokus pada pengendalian iklim, dikoordinasikan oleh Divisi *Change Management Office* bersama divisi serta unit kerja terkait. Unit ini berperan dalam merancang, melaksanakan, sekaligus memantau inisiatif strategis yang berorientasi pada pengurangan emisi GRK. Sejumlah langkah nyata yang telah dijalankan mencakup:

1. Penerapan teknologi hemat energi di seluruh kantor operasional.
2. Optimalisasi pengelolaan limbah guna menekan dampak lingkungan.
3. Pengurangan emisi operasional melalui digitalisasi proses serta pembatasan perjalanan dinas.

Commitment to Reduce Greenhouse Gas Emissions [E-06] [E-07]

Bank Victoria is committed to supporting the global agenda of controlling climate change through efforts to reduce GHG emissions. To ensure the effectiveness of this initiative, the Bank establishes a dedicated climate management system, coordinated by Change Management Office Division, along with relevant divisions and work units. This unit plays a role in designing, implementing, and monitoring strategic initiatives aimed at reducing GHG emissions. Several concrete steps implemented include:

1. Implementation of energy-saving technology in all operational offices.
2. Optimizing waste management to minimize environmental impact.
3. Reducing operational emissions through process digitization and limiting business trip.

Bank Victoria meyakini bahwa keterlibatan aktif dalam pengendalian emisi GRK tidak hanya menjadi kontribusi bagi pelestarian lingkungan, tetapi juga menciptakan nilai tambah bagi masyarakat dan pemangku kepentingan. Komitmen ini akan terus diperkuat untuk mewujudkan masa depan yang lebih hijau, berkelanjutan, dan inklusif.

Bank Victoria believes that active involvement in controlling GHG emissions not only contributes to environmental preservation but also creates added value for the community and stakeholders. This commitment will continue to be strengthened to realize a greener, more sustainable, and more inclusive future.

Sarana Pengaduan terkait Masalah Lingkungan [POJK F.16]

Saat ini, Bank belum menetapkan mekanisme khusus untuk penanganan pengaduan terkait isu lingkungan, mengingat operasional perbankan tidak memiliki dampak langsung terhadap kelestarian lingkungan hidup. Meskipun demikian, Bank tetap membuka akses bagi para pemangku kepentingan yang ingin menyampaikan keluhan atau masukan apabila terdapat kegiatan Bank yang berpotensi menimbulkan gangguan terhadap lingkungan. Saluran pengaduan yang tersedia meliputi email, *call center*, situs web resmi, serta media sosial Bank.

Dalam kurun waktu 3 (tiga) tahun terakhir, Bank tidak menerima laporan terkait masalah lingkungan hidup.

Complaint Channel related to Environmental Issue [POJK F.16]

Currently, the Bank has not established a specific mechanism for handling complaints related to environmental issues, given that banking operations do not have a direct impact on environmental sustainability. Nevertheless, the Bank continues to provide access for stakeholders who wish to submit complaints or feedback in case there are Bank activities with potential to disrupt the environment. Complaint channels that are available include email, call center, official website, and the Bank's social media channels.

In the past 3 (three) years, the Bank did not receive any reports related to environmental issue.

Biaya Lingkungan Hidup [POJK F.4]

Saat ini, Bank belum menetapkan pos anggaran tersendiri untuk kegiatan pengelolaan lingkungan. Seluruh kebutuhan terkait aspek tersebut masih tercakup dalam anggaran operasional kantor secara keseluruhan.

Environmental Costs [POJK F.4]

Currently, the Bank has not designated a separate budget item for environmental management activities. All needs related to this aspect are still covered within the overall office operating budget.

Indeks Pengungkapan Kriteria Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 [POJK G.4]

Financial Services Authority Regulation Criteria Disclosure Index No. 51/POJK.03/2017

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Tanggapan terhadap Umpan Balik Laporan Tahun Sebelumnya [POJK G.3]

Responses to Previous Year's Report Feedback

Bank tidak mendapat tanggapan dari para pemangku kepentingan setelah diterbitkannya Laporan Tahunan dan Keberlanjutan 2024. Dengan demikian, dalam Laporan ini tidak terdapat informasi secara spesifik tentang tindak lanjut yang diambil Bank atas tanggapan dari pemangku kepentingan tahun sebelumnya.

The Bank did not receive any responses from stakeholders subsequent to the publication of the 2024 Annual and Sustainability Report. Therefore, this Report contains no specific information on the follow-up actions taken by the Bank on the responses from stakeholders in the previous year.

Verifikasi Tertulis dari Pihak Independen [POJK.G.1]

Written Verification from Independent Party

Bank memastikan bahwa seluruh isi dan data yang disampaikan telah melalui tahap verifikasi internal walaupun Bank tidak menggunakan jasa penjamin (*assurance*).

The Bank ensures that all contents and data submitted have undergone internal verification phase even though the Bank does not use assurance services.

Lembar Umpan Balik [POJK G.2]

Feedback Form

Setelah membaca Laporan Keberlanjutan PT Bank Victoria International Tbk, kami mohon kesediaan para pemangku kepentingan untuk memberikan umpan balik dengan mengirim *e-mail* atau mengirim formulir ini melalui fax/pos.

After reading this Sustainability Report of PT Bank Victoria International Tbk, we would like to ask all stakeholders to kindly provide feedback by sending e-mail or sending this form by fax/mail.

Pertanyaan Questions	Setuju Agree	Tidak Setuju Disagree
Laporan ini telah memberikan informasi yang bermanfaat mengenai kinerja ekonomi, sosial, dan lingkungan perusahaan. This report has provided useful information on economic, social, and environmental performance of he company.		
Data dan informasi yang diungkapkan mudah dipahami, lengkap, transparan, dan berimbang. Data and information disclosed are easy to understand, complete, transparent, and balanced.		
Data dan informasi yang disajikan berguna dalam pengambilan keputusan. Data and information presented are useful for making decision.		
Laporan ini menarik dan mudah dibaca. This report is interesting and easy to read.		

Mohon berikan nilai mengenai aspek yang terdapat dalam laporan ini (nilai 1 = paling penting, 2 = penting, 3 = tidak penting, 4 = sangat tidak penting).

Please score on aspects presented in this report (1 = most important, 2 = important, 3 = less important, 4 = least important).

- ☐ Kinerja Ekonomi
Economic Performance
- ☐ Pinjaman UMKM
MSME Loans
- ☐ Pemberian Kredit dengan Pertimbangan Aspek Lingkungan
Providing Loans with the Consideration of Environmental Aspects
- ☐ Kesetaraan Gender dan Kesempatan Kerja yang Adil
Gender Equality and Fair Job Opportunity
- ☐ Pelatihan dan Pendidikan
Training and Education
- ☐ Kesehatan dan Keselamatan Kerja
Occupational Health and Safety
- ☐ *Anti-Fraud*
Anti-Fraud
- ☐ Privasi Nasabah
Customer Privacy
- ☐ Penggunaan Energi
Energy Consumption
- ☐ Penggunaan Air
Water Consumption
- ☐ Pengelolaan Limbah
Waste Treatment
- ☐ Pengembangan Masyarakat
Community Development

Mohon berikan komentar/saran/usulan bagi laporan ini.

Please provide your comments/suggestions/ideas for this report.

.....

.....

.....

Profil Anda / Your Profile

Nama / Name : .....

Pekerjaan / Occupation : .....

Institusi/Perusahaan / Institution/Company : .....

Kontak (telepon, *e-mail*) Contact (telephone, e-mail) : .....

Kategori Pemangku Kepentingan / Category of Stakeholder

- Pemerintah / Government
- Mitra Usaha / Business Partners
- LSM / NGO
- Nasabah / Customer
- Media
- Lain-Lain, ... / Others, ...
- Karyawan / Employees
- Masyarakat / Community

Saran dan tanggapan yang Anda berikan atas informasi yang disajikan dalam laporan ini mohon dikirimkan kepada:

Please send your suggestion and response to the information presented in this report to:

Kantor Pusat Bank Victoria
Head Office of Bank Victoria

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Kriteria Penyampaian Laporan Tahunan berdasarkan Surat Edaran Otoritas Jasa Keuangan No. 16/SEOJK.04/2021

Criteria for Annual Report Submission based on Financial Services Authority Circular No. 16/SEOJK.04/2021

Kriteria Criteria	Penjelasan Explanation	Halaman Page
Ketentuan Umum **General Provisions**		
Laporan Tahunan disajikan dalam bentuk dokumen cetak dan dokumen elektronik. The Annual Report is presented in the form of printed documents and electronic documents.		√
Laporan Tahunan yang disajikan dalam bentuk dokumen cetak, dicetak pada kertas yang berwarna terang, berkualitas baik, berukuran A4, dijilid, dan dapat diperbanyak dengan kualitas yang baik. The Annual Report is presented in hardcopy format, printed on bright colored paper, of good quality, A4 size, bound, and can be reproduced in good quality.		√
Laporan Tahunan dapat menyajikan informasi berupa gambar, grafik, tabel, dan/atau diagram dengan mencantumkan judul dan/atau keterangan yang jelas, sehingga mudah dibaca dan dipahami. The Annual Report can present information in the form of pictures, graphs, tables and/or diagrams by including clear titles and/or descriptions, so that they are easy to read and understand.		√
Laporan Tahunan yang disajikan dalam bentuk dokumen elektronik merupakan Laporan Tahunan yang dikonversi dalam *portable document format* (PDF). The Annual Report presented in the form of an electronic document is an Annual Report that is converted in portable document format (PDF).		√
Isi Laporan Tahunan **Annual Report Contents**		
Kilas Kinerja **Performance Highlights**		
Ikhtisar data keuangan penting memuat informasi keuangan yang disajikan dalam bentuk perbandingan selama 3 (tiga) tahun buku atau sejak memulai usahanya jika Emiten atau Perusahaan Publik tersebut menjalankan kegiatan usahanya kurang dari 3 (tiga) tahun. Summary of important financial data contains financial information presented in comparative form for 3 (three) financial years or since the business starts if the Issuer or Public Company started its business in less than 3 (three) years ago.	Informasi memuat antara lain: 1. Pendapatan/penjualan; 2. Laba bruto; 3. Laba (rugi); 4. Jumlah laba (rugi) yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non-pengendali; 5. Total laba (rugi) komprehensif; 6. Jumlah laba (rugi) komprehensif yang dapat diatribusikan kepada pemilik entitas induk dan kepentingan non-pengendali; 7. Laba (rugi) per saham; 8. Jumlah aset; 9. Jumlah liabilitas; 10. Jumlah ekuitas; 11. Rasio laba (rugi) terhadap jumlah aset; 12. Rasio laba (rugi) terhadap ekuitas; 13. Rasio laba (rugi) terhadap pendapatan; 14. Rasio lancar; 15. Rasio liabilitas terhadap ekuitas; 16. Rasio liabilitas terhadap jumlah aset; dan 17. Informasi dan rasio keuangan lainnya yang relevan dengan perusahaan dan jenis industrinya. Information includes, among others: 1. Revenue/sales; 2. Gross profit; 3. Profit (loss); 4. Total profit (loss) attributable to owners of the parent entity and non-controlling interests; 5. Total comprehensive profit (loss); 6. Total comprehensive profit (loss) attributable to owners of the parent entity and non-controlling interests; 7. Earnings (loss) per share; 8. Total assets; 9. Total liabilities; 10. Total equity; 11. Profit (loss) to total assets ratio;	**19**

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	12.Profit (loss) to equity ratio; 13.Profit (loss) to revenue ratio; 14.Current ratio; 15.Liabilities to equity ratio; 16.Liabilities to total assets ratio; and 17.Information and other financial ratios that are relevant to the company and the type of industry.	
Informasi Saham	Informasi saham bagi Perusahaan Terbuka paling sedikit memuat: 1. Saham yang telah diterbitkan untuk setiap masa triwulan yang disajikan dalam bentuk perbandingan selama 2 (dua) tahun buku terakhir, paling sedikit memuat: a. Jumlah saham yang beredar; b. Kapitalisasi pasar berdasarkan harga pada bursa efek tempat saham dicatatkan; c. Harga saham tertinggi, terendah, dan penutupan berdasarkan harga pada bursa efek tempat saham dicatatkan; dan d. Volume perdagangan pada bursa efek tempat saham dicatatkan. Informasi dalam huruf b), huruf c) dan huruf d) hanya diungkapkan jika sahamnya tercatat di bursa efek; 2. Dalam hal terjadi aksi korporasi yang menyebabkan terjadinya perubahan pada saham, seperti pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, perubahan nilai nominal saham, penerbitan efek konversi, serta penambahan dan pengurangan modal, informasi saham sebagaimana dimaksud pada angka 1) ditambahkan penjelasan paling sedikit mengenai: a. Tanggal pelaksanaan aksi korporasi; b. Rasio pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, jumlah efek konversi yang diterbitkan, dan perubahan nilai nominal saham; c. Jumlah saham beredar sebelum dan sesudah aksi korporasi; d. Jumlah efek konversi yang dilaksanakan (jika ada); dan e. Harga saham sebelum dan sesudah aksi korporasi; 3. Dalam hal terjadi penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) dalam tahun buku, dijelaskan alasan penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) tersebut; dan 4. Dalam hal penghentian sementara perdagangan saham (*suspension*) sebagaimana dimaksud pada angka 3) dan/atau proses pembatalan pencatatan saham (*delisting*) masih berlangsung hingga akhir periode laporan tahunan, dijelaskan tindakan yang dilakukan untuk menyelesaikan penghentian sementara perdagangan saham (*suspension*) dan/atau pembatalan pencatatan saham (*delisting*) tersebut.	**23**
Share Information	Information on shares for Public Companies at least contains: 1. Shares that have been issued for each quarter, presented in comparative form for the last 2 (two) financial years, at least contain: a. Number of outstanding shares; b. Market capitalization based on the price on the stock exchange where the shares are listed; c. The highest, lowest, and closing share prices based on the price on the stock exchange where the shares are listed; and d. Trading volume on the stock exchange where the shares are listed. Information in letter b), letter c) and letter d) is only disclosed if the shares are listed on the stock exchange; 2. In the event of a corporate action causing a change in shares, such as stock split, reverse stock, share dividends, bonus shares, changes in the nominal value of shares, issuance of convertible securities, as well as capital increase and decrease, share information as referred to in number 1) shall be added with an explanation of at least: a. The corporate action execution date; b. Ratio of stock split, reverse stock, stock dividends, bonus shares, number of convertible securities issued, and changes in share par value; c. The number of outstanding shares before and after the corporate action; d. The number of convertible securities executed (if any); and e. Share prices before and after corporate actions;	

Kriteria Criteria	Penjelasan Explanation	Halaman Page
	3. In the event of temporary suspension of share trading and/or delisting of share in the financial year, the reasons for the temporary suspension of share trading and/or delisting of share must be explained; and 4. In the event of temporary suspension of share trading as referred to in number 3) and/or the process of delisting of shares is still ongoing at the end of the annual report period, the actions taken to resolve the temporary suspension of share trading and/or delisting of share must be explained.	
Laporan Direksi dan Dewan Komisaris **Report of the Board of Directors and Board of Commissioners**		
Laporan Direksi Board of Directors' Report	Laporan Direksi paling sedikit memuat uraian singkat mengenai: 1. Kinerja Emiten atau Perusahaan Publik, paling sedikit memuat: a. Strategi dan kebijakan strategis Emiten atau Perusahaan Publik; b. Peranan Direksi dalam perumusan strategi dan kebijakan strategis Emiten atau Perusahaan Publik; c. Proses yang dilakukan Direksi untuk memastikan implementasi strategi Emiten atau Perusahaan Publik; d. Perbandingan antara hasil yang dicapai dengan yang ditargetkan Emiten atau Perusahaan Publik; dan e. Kendala yang dihadapi Emiten atau Perusahaan Publik; 2. Gambaran tentang prospek usaha Emiten atau Perusahaan Publik; dan 3. Penerapan tata kelola Emiten atau Perusahaan Publik. The Board of Directors' report contains at least a brief description of: 1. Performance of Issuers or Public Companies, at least includes: a. Issuer's or Public Company's strategy and strategic policies; b. The role of the Board of Directors in formulating the strategy and strategic policies of the Issuer or Public Company; c. The process carried out by the Board of Directors to ensure the implementation of the Issuer's or Public Company's strategy; d. Comparison between the results achieved and those targeted by the Issuer or Public Company; and e. Obstacles faced by Issuers or Public Companies; 2. An overview of the business prospects of the Issuer or Public Company; and 3. Implementation of Issuer or Public Company governance.	**48**
Laporan Dewan Komisaris Board of Commissioners' Report	Laporan Dewan Komisaris paling sedikit memuat uraian singkat mengenai: 1. Penilaian terhadap kinerja Direksi mengenai pengelolaan Emiten atau Perusahaan Publik, termasuk pengawasan Dewan Komisaris dalam perumusan dan implementasi strategi Emiten atau Perusahaan Publik yang dilakukan oleh Direksi; 2. Pandangan atas prospek usaha Emiten atau Perusahaan Publik yang disusun oleh Direksi; dan 3. Pandangan atas penerapan tata kelola Emiten atau Perusahaan Publik. The Board of Commissioners' report contains at least a brief description of: 1. Assessment of the Board of Directors' performance regarding the management of the Issuer or Public Company, including the Board of Commissioners' oversight in the formulation and implementation of the Issuer's or Public Company's strategy carried out by the Board of Directors; 2. Views on the business prospects of the Issuer or Public Company prepared by the Board of Directors; and 3. Views on the implementation of governance of the Issuer or Public Company.	**40**
Profil Perusahaan **Company Profile**		
1. Nama Emiten atau Perusahaan Publik termasuk apabila terdapat perubahan nama, alasan perubahan, dan tanggal efektif perubahan nama pada tahun buku. Name of Issuer or Public Company including if there is a name change, reasons for the change, and the effective date of the name change in the financial year.		**62**

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2. Akses terhadap Emiten atau Perusahaan Publik termasuk kantor cabang atau kantor perwakilan yang memungkinkan masyarakat dapat memperoleh informasi mengenai Emiten atau Perusahaan Publik. Access to Issuers or Public Companies including branch offices or representative offices that enable the public to obtain information about Issuers or Public Companies.	a. Alamat; b. Nomor telepon; c. Alamat surat elektronik; dan d. Alamat situs web. a. Address; b. Phone number; c. Electronic mail address; and d. Website address.	62
3. Riwayat singkat Emiten atau Perusahaan Publik. Brief history of Issuer or Public Company.		64
4. Visi dan misi Emiten atau Perusahaan Publik serta budaya perusahaan (*corporate culture*) atau nilai-nilai perusahaan. Issuer's or Public Company's vision and mission and corporate culture or corporate values.		66
5. Kegiatan usaha menurut anggaran dasar terakhir, kegiatan usaha yang dijalankan pada tahun buku, serta jenis barang dan/atau jasa yang dihasilkan. Business activities according to the latest articles of association, business activities carried out in the financial year, and types of goods and/or services produced.		68; 70
6. Wilayah operasional Emiten atau Perusahaan Publik; wilayah operasional merupakan wilayah atau daerah pelaksanaan kegiatan operasional atau jangkauan dari kegiatan operasional perusahaan. The operational area of the Issuer or Public Company; operational area is the area or region where the operational activities take place or the coverage area of the company's operational activities.		72
7. Struktur organisasi Emiten atau Perusahaan Publik dalam bentuk bagan, paling sedikit sampai dengan struktur 1 (satu) tingkat di bawah Direksi termasuk komite di bawah Direksi (jika ada) dan komite di bawah Dewan Komisaris, disertai dengan nama dan jabatan. The organizational structure of the Issuer or Public Company in the form of a chart, at least up to 1 (one) level below the Board of Directors including committees under the Board of Directors (if any) and committees under the Board of Commissioners, accompanied by names and positions.		76
8. Daftar keanggotaan asosiasi industri baik dalam skala nasional maupun internasional yang berkaitan dengan penerapan keuangan berkelanjutan. List of industry association memberships both on a national and international scale related to the implementation of sustainable finance.		78
9. Profil Direksi.	a. Nama dan jabatan yang sesuai dengan tugas dan tanggung jawab; b. Foto terbaru; c. Usia; d. Kewarganegaraan; e. Riwayat pendidikan dan/atau sertifikasi; f. Riwayat jabatan, meliputi informasi: 1) Dasar hukum pengangkatan sebagai anggota Direksi pada Emiten atau Perusahaan Publik yang bersangkutan; 2) Rangkap jabatan, baik sebagai anggota Direksi, anggota Dewan Komisaris, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar Emiten atau Perusahaan Publik. Dalam hal anggota Direksi tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik;	82

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	g. Hubungan afiliasi dengan anggota Direksi lainnya, anggota Dewan Komisaris, pemegang saham utama, dan pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi. Dalam hal anggota Direksi tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; dan h. Perubahan komposisi anggota Direksi dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Direksi, maka diungkapkan mengenai hal tersebut.	
Board of Directors' Profile.	a. Name and position according to duties and responsibilities; b. Latest photos; c. Age; d. Citizenship; e. Educational history and/or certification; f. Position history, including information on: 1) The legal basis of appointment as a member of the Board of Directors of the Issuer or Public Company concerned; 2) Concurrent positions, as members of the Board of Directors, members of the Board of Commissioners, and/or committee members as well as other positions inside and outside the Issuer or Public Company. In the event that members of the Board of Directors do not have concurrent positions, then this shall be disclosed; and 3) Work experience and time period inside and outside the Issuer or Public Company; g. Affiliation with other members of the Board of Directors, members of the Board of Commissioners, major and controlling shareholders, either directly or indirectly up to individual owners, including names of affiliated parties. In the event that members of the Board of Directors have no affiliation, then the Issuer or Public Company shall disclose this matter; and h. Changes in the composition of members of the Board of Directors and reasons for the changes. In the event that there is no change in the composition of the members of the Board of Directors, this shall be disclosed.	
10.Profil Dewan Komisaris.	a. Nama dan jabatan; b. Foto terbaru; c. Usia; d. Kewarganegaraan; e. Riwayat pendidikan dan/atau sertifikasi; f. Riwayat jabatan, meliputi informasi: 1) Dasar hukum pengangkatan sebagai anggota Dewan Komisaris; 2) Dasar hukum pengangkatan pertama kali sebagai anggota Dewan Komisaris yang merupakan Komisaris Independen pada Emiten atau Perusahaan Publik yang bersangkutan; 3) Rangkap jabatan, baik sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau anggota komite serta jabatan lainnya baik di dalam maupun di luar Emiten atau Perusahaan Publik. Dalam hal anggota Dewan Komisaris tidak memiliki rangkap jabatan, maka diungkapkan mengenai hal tersebut; dan 4) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; g. Hubungan afiliasi dengan anggota Dewan Komisaris lainnya, Pemegang Saham Utama, dan Pengendali baik langsung maupun tidak langsung sampai kepada pemilik individu, meliputi nama pihak yang terafiliasi; Dalam hal anggota Dewan Komisaris tidak memiliki hubungan afiliasi, maka Emiten atau Perusahaan Publik mengungkapkan hal tersebut; h. Pernyataan independensi Komisaris Independen dalam hal Komisaris Independen telah menjabat lebih dari 2 (dua) periode; dan i. Perubahan komposisi anggota Dewan Komisaris dan alasan perubahannya. Dalam hal tidak terdapat perubahan komposisi anggota Dewan Komisaris, maka diungkapkan mengenai hal tersebut.	**79**
Board of Commissioners' Profile.	a. Name and position; b. Latest photos; c. Age; d. Citizenship; e. Educational history and/or certification;	

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	f. Position history, including information on: 1) Legal basis of appointment as a member of the Board of Commissioners; 2) The legal basis for the first appointment as a member of the Board of Commissioners who is an Independent Commissioner at the Issuer or Public Company concerned; 3) Concurrent positions, as members of the Board of Commissioners, members of the Board of Directors, and/or committee members as well as other positions inside and outside the Issuer or Public Company. In the event that members of the Board of Commissioners do not have concurrent positions, then this shall be disclosed; and 4) Work experience and time period inside and outside the Issuer or Public Company; g. Affiliation with other members of the Board of Commissioners, major and controlling shareholders, either directly or indirectly up to individual owners, including names of affiliated parties; In the event that members of the Board of Commissioners have no affiliation, the Issuer or Public Company shall disclose this matter; h. Statement of independency of the independent commissioner in the event that the independent commissioner has served more than 2 (two) periods; and i. Changes in the composition of members of the Board of Commissioners and reasons for changes. In the event that there is no change in the composition of the members of the Board of Commissioners, this shall be disclosed.	
11. Dalam hal terdapat perubahan susunan anggota Direksi dan/atau anggota Dewan Komisaris yang terjadi setelah tahun buku berakhir sampai dengan batas waktu penyampaian Laporan Tahunan, susunan yang dicantumkan dalam Laporan Tahunan adalah susunan anggota Direksi dan/atau anggota Dewan Komisaris yang terakhir dan sebelumnya. In the event that there is a change in the composition of members of the Board of Directors and/or members of the Board of Commissioners that occurs after the end of the financial year until the deadline for submitting the Annual Report, the composition included in the Annual Report is the last and previous composition of members of the Board of Directors and/or members of the Board of Commissioners.		**81; 86**
12. Jumlah karyawan menurut jenis kelamin, jabatan, usia, tingkat pendidikan, dan status ketenagakerjaan (tetap/kontrak) dalam tahun buku. Number of employees by gender, position, age, educational level, and employment status (permanent/contract) in the financial year.	Pengungkapan informasi dapat disajikan dalam bentuk tabel. Disclosure of information can be presented in tabular form.	**503**
13. Nama pemegang saham dan persentase kepemilikan pada awal dan akhir tahun buku. Name of shareholder and ownership percentage at the beginning and end of the financial year.	a. Pemegang saham yang memiliki 5% (lima persen) atau lebih saham Emiten atau Perusahaan Publik; b. Anggota Direksi dan anggota Dewan Komisaris yang memiliki saham Emiten atau Perusahaan Publik. Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki saham, maka diungkapkan mengenai hal tersebut; dan c. Kelompok pemegang saham masyarakat, yaitu kelompok pemegang saham yang masing-masing memiliki kurang dari 5% (lima persen) saham Emiten atau Perusahaan Publik. Informasi di atas dapat disajikan dalam bentuk tabel. a. Shareholders who own 5% (five percent) or more shares of the Issuer or Public Company; b. Members of the Board of Directors and members of the Board of Commissioners who own shares of Issuers or Public Companies. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not own shares, this shall be disclosed; and c. Group of public shareholders, namely groups of shareholders who each own less than 5% (five percent) of the shares of the Issuer or Public Company. The above information can be presented in tabular form.	**92; 93; 94**

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14. Persentase kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik oleh anggota Direksi dan anggota Dewan Komisaris pada awal dan akhir tahun buku, termasuk informasi mengenai pemegang saham yang terdaftar dalam daftar pemegang saham untuk kepentingan kepemilikan tidak langsung anggota Direksi dan anggota Dewan Komisaris. Percentage of indirect ownership of Issuer or Public Company shares by members of the Board of Directors and members of the Board of Commissioners at the beginning and end of the financial year, including information regarding shareholders who are registered in the shareholders register for the benefit of indirect ownership by members of the Board of Directors and members of the Board of Commissioners.	Dalam hal seluruh anggota Direksi dan/atau seluruh anggota Dewan Komisaris tidak memiliki kepemilikan tidak langsung atas saham Emiten atau Perusahaan Publik, maka diungkapkan mengenai hal tersebut. In the event that all members of the Board of Directors and/or all members of the Board of Commissioners do not have indirect ownership of shares of Issuer or Public Company, then this matter shall be disclosed.	94
15. Jumlah pemegang saham dan persentase kepemilikan per akhir tahun buku berdasarkan klasifikasi: Number of shareholders and ownership percentage at the end of the financial year based on classification:	a. Kepemilikan institusi lokal; b. Kepemilikan institusi asing; c. Kepemilikan individu lokal; dan d. Kepemilikan individu asing; a. Ownership of local institutions; b. Ownership of foreign institutions; c. Ownership of local individuals; and d. Ownership of foreign individuals;	95
16. Informasi mengenai pemegang saham utama dan pengendali Emiten atau Perusahaan Publik, baik langsung maupun tidak langsung, sampai kepada pemilik individu, yang disajikan dalam bentuk skema atau bagan. Information regarding major and controlling shareholders of Issuers or Public Companies, either directly or indirectly, up to individual owners, presented in the form of a schematic or chart.		96
17. Nama entitas anak, perusahaan asosiasi, perusahaan ventura bersama dimana Emiten atau Perusahaan Publik memiliki pengendalian bersama entitas (jika ada), beserta persentase kepemilikan saham, bidang usaha, total aset, dan status operasi entitas anak, perusahaan asosiasi, perusahaan ventura bersama. Names of subsidiaries, associated companies, joint venture companies where the Issuer or Public Company has joint control of an entity (if any), along with share ownership percentage, line of business, total assets, and operating status of subsidiaries, associated companies, joint venture companies.	Untuk entitas anak, ditambahkan informasi mengenai alamat entitas anak tersebut. For subsidiaries, information regarding the address of subsidiary is added.	96
18. Kronologis pencatatan saham, jumlah saham, nilai nominal, dan harga penawaran dari awal pencatatan hingga akhir tahun buku serta nama bursa efek di mana saham Emiten atau Perusahaan Publik dicatatkan, termasuk pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), dividen saham, saham bonus, dan perubahan nilai nominal saham, pelaksanaan efek konversi, pelaksanaan penambahan dan pengurangan modal (jika ada); Chronology of share listing, number of shares, nominal value, and offering price from the beginning of listing to the end of the financial year as well as the name of the stock exchange where the Issuer's or Public Company's shares are listed, including stock split, reverse stock, share dividends, bonus shares, and changes in the nominal value of shares, exercise of convertible securities, capital increase and decrease (if any);		97

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19. Informasi pencatatan efek lainnya selain efek sebagaimana dimaksud pada angka 18), yang belum jatuh tempo pada tahun buku paling sedikit memuat nama efek, tahun penerbitan, tingkat suku `bunga/imbal hasil, tanggal jatuh tempo, nilai penawaran, dan peringkat efek (jika ada). Information on the listing of other securities besides the securities referred to in number 18), which have not yet matured in the financial year, at least contains the name of the securities, year of issuance, interest/yield rate, maturity date, offering price, and securities rating (if any).		99
20. Informasi penggunaan jasa akuntan publik (AP) dan kantor akuntan publik (KAP) beserta jaringan/asosiasi/aliansinya. Information on the use of services from public accounting (AP) and public accounting firm (KAP) and their networks/associations/alliances.	a. Nama dan alamat; b. Periode penugasan; c. Informasi jasa audit dan/atau non audit yang diberikan; d. Biaya jasa (fee) audit dan/atau non audit untuk masing-masing penugasan yang diberikan selama tahun buku; dan e. Dalam hal AP dan KAP beserta jaringan/asosiasi/aliansinya, yang ditunjuk tidak memberikan jasa non audit, maka diungkapkan mengenai informasi tersebut. Pengungkapan informasi penggunaan jasa AP dan KAP beserta jaringan/asosiasi/aliansinya dapat disajikan dalam bentuk tabel. a. Name and address; b. Assignment period; c. Information on audit and/or non-audit services provided; d. Audit and/or non-audit service fees for each assignment given during the financial year; and e. In the event that the designated AP and KAP and their network/association/alliance do not provide non-audit services, the information shall be disclosed. Disclosure of information on the use of AP and KAP services and their networks/associations/alliances can be presented in tabular form.	102
21. Nama dan alamat lembaga dan/atau profesi penunjang pasar modal selain AP dan KAP. Profile. Names and addresses of capital market supporting institutions and/or professions other than AP and KAP.		103
Analisis dan Pembahasan Manajemen **Management Discussion and Analysis**		
Analisis dan pembahasan manajemen memuat analisis dan pembahasan mengenai laporan keuangan dan informasi penting lainnya dengan penekanan pada perubahan material yang terjadi dalam tahun buku. Management discussion and analysis contains discussion and analysis of financial statements and other important information with an emphasis on material changes that occurred during the financial year.		
1. Tinjauan operasi per segmen usaha sesuai dengan jenis industri Emiten atau Perusahaan Publik. Overview of operations per business segment according to the type of industry of the Issuer or Public Company.	a. Produksi, yang meliputi proses, kapasitas, dan perkembangannya; b. Pendapatan/penjualan; dan c. Profitabilitas. a. Production, which includes process, capacity, and development; b. Revenue/sales; and c. Profitability.	109
2. Kinerja keuangan komprehensif yang mencakup perbandingan kinerja keuangan dalam 2 (dua) tahun buku terakhir, penjelasan tentang penyebab adanya perubahan dan dampak perubahan tersebut.	a. Aset lancar, aset tidak lancar, dan total aset; b. Liabilitas jangka pendek, liabilitas jangka panjang, dan total liabilitas; c. Ekuitas; d. Pendapatan/penjualan, beban, laba (rugi), penghasilan komprehensif lain, dan total laba (rugi) komprehensif; dan e. Arus kas.	127

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Comprehensive financial performance which includes a comparison of financial performance in the last 2 (two) financial years, with explanation of causes of changes and impact of changes.	a. Current assets, non-current assets, and total assets; b. Current liabilities, non-current liabilities, and total liabilities; c. Equity; d. Revenue/sales, expenses, profit (loss), other comprehensive income, and total comprehensive profit (loss); and e. Cash flows.	
3. Kemampuan membayar utang atau kewajiban dengan menyajikan perhitungan rasio yang relevan. Profile. Debt or liabilities service ability by presenting the calculation of relevant ratio.		**134**
4. Tingkat kolektibilitas piutang Emiten atau Perusahaan Publik dengan menyajikan perhitungan rasio yang relevan. Receivables turnover ratio of the Issuer or Public Company by presenting calculation of relevant ratio.		**135**
5. Struktur modal (*capital structure*) dan kebijakan manajemen atas struktur modal (*capital structure*) tersebut disertai dasar penentuan kebijakan dimaksud. Capital structure and management policy on capital structure accompanied by the basis for determining the said policy.		**136**
6. Bahasan mengenai ikatan yang material untuk investasi barang modal. Discussion on material commitments for capital goods investment.	a. Tujuan dari ikatan tersebut; b. Sumber dana yang diharapkan untuk memenuhi ikatan tersebut; c. Mata uang yang menjadi denominasi; dan d. Langkah yang direncanakan Emiten atau Perusahaan Publik untuk melindungi risiko dari posisi mata uang asing yang terkait. a. The purpose of the commitment; b. The source of funds expected to fulfill the said commitment; c. The currency; and d. Steps planned by the Issuer or Public Company to protect against risks from related foreign currency positions.	**137**
7. Bahasan mengenai investasi barang modal yang direalisasikan dalam tahun buku terakhir. Discussion on capital goods investment realized in the last financial year.	a. Jenis investasi barang modal; b. Tujuan investasi barang modal; dan c. Nilai investasi barang modal yang dikeluarkan. a. Type of capital goods investment; b. The purpose of capital goods investment; and c. The value of capital goods investment.	**138**
8. Informasi dan fakta material yang terjadi setelah tanggal laporan akuntan (jika ada). Information and material facts that occurred after the date of the accountant's report (if any).		**142**
9. Prospek usaha dari Emiten atau Perusahaan Publik dikaitkan dengan kondisi industri, ekonomi secara umum dan pasar internasional disertai data pendukung kuantitatif dari sumber data yang layak dipercaya. The business prospects of Issuers or Public Companies connected to industry conditions, the general economy and international markets accompanied by quantitative supporting data from reliable data sources.		**124**
10. Perbandingan antara target/proyeksi pada awal tahun buku dengan hasil yang dicapai (realisasi). Comparison between targets/projections at the beginning of financial year and the results achieved (realization).	a. Pendapatan/penjualan; b. Laba (rugi); c. Struktur modal (capital structure); atau d. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. a. Revenue/sales; b. Profit (loss); c. Capital structure; or d. Other matters deemed important by the Issuer or Public Company.	**139**

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11. Target/proyeksi yang ingin dicapai Emiten atau Perusahaan Publik untuk 1 (satu) tahun mendatang. Targets/projections to be achieved by the Issuer or Public Company for the next 1 (one) year.	a. Pendapatan/penjualan; b. Laba (rugi); c. Struktur modal (capital structure); d. Kebijakan dividen; atau e. Hal lainnya yang dianggap penting bagi Emiten atau Perusahaan Publik. a. Revenue/sales; b. Profit (loss); c. Capital structure; d. Dividend policy; or e. Other matters deemed important by the Issuer or Public Company.	140
12. Aspek pemasaran atas barang dan/atau jasa Emiten atau Perusahaan Publik, paling sedikit mengenai strategi pemasaran dan pangsa pasar. Marketing aspects of the Issuer's or Public Company's goods and/or services, at least regarding marketing strategy and market share.		112
13. Uraian mengenai dividen selama 2 (dua) tahun buku terakhir. Description of dividends for the last 2 (two) financial years.	a. Kebijakan dividen, antara lain memuat informasi persentase jumlah dividen yang dibagikan terhadap laba bersih; b. Tanggal pembayaran dividen kas dan/atau tanggal distribusi dividen non-kas; c. Jumlah dividen per saham (kas dan/atau non-kas); dan d. Jumlah dividen per tahun yang dibayar. Pengungkapan informasi dapat disajikan dalam bentuk tabel. Dalam hal Emiten atau Perusahaan Publik tidak membagikan dividen dalam 2 (dua) tahun terakhir, maka diungkapkan mengenai hal tersebut. a. Dividend policy, including information on the percentage of the amount of dividends distributed to net profit; b. Cash dividend payment date and/or non-cash dividend distribution date; c. Total dividend per share (cash and/or non-cash); and d. The amount of dividends per year paid. Disclosure of information can be presented in tabular form. In the event that the Issuer or Public Company has not distributed dividends in the last 2 (two) years, this shall be disclosed.	143
14. Realisasi penggunaan dana hasil penawaran umum. Realization of the use of proceeds from the public offering.	a. Dalam hal selama tahun buku, Emiten memiliki kewajiban menyampaikan laporan realisasi penggunaan dana, maka diungkapkan realisasi penggunaan dana hasil penawaran umum secara kumulatif sampai dengan akhir tahun buku; dan b. Dalam hal terdapat perubahan penggunaan dana sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai laporan realisasi penggunaan dana hasil penawaran umum, maka Emiten menjelaskan perubahan tersebut. a. In the event that during the financial year, the Issuer has an obligation to submit a report on the realization of use of proceeds, then the cumulative realization of the use of proceeds from the public offering until the end of the financial year shall be disclosed; and b. In the event that there is a change in the use of proceeds as stipulated in the Financial Services Authority Regulation regarding the report on realization of use of proceeds from a public offering, the Issuer shall explain such change.	143

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15. Informasi material (jika ada), antara lain mengenai investasi, ekspansi, divestasi, penggabungan/ peleburan usaha, akuisisi, restrukturisasi utang/modal, transaksi material, transaksi afiliasi, dan transaksi benturan kepentingan, yang terjadi pada tahun buku.	a. Tanggal, nilai, dan objek transaksi; b. Nama pihak yang melakukan transaksi; c. Sifat hubungan afiliasi (jika ada); d. Penjelasan mengenai kewajaran transaksi; e. Pemenuhan ketentuan terkait; dan f. Dalam hal terdapat hubungan afiliasi, selain mengungkapkan informasi sebagaimana dimaksud dalam huruf a) sampai dengan huruf e), Emiten atau Perusahaan Publik juga mengungkapkan informasi: 1) Pernyataan Direksi bahwa transaksi afiliasi telah melalui prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*armslength principle*); dan 2) Peran Dewan Komisaris dan Komite Audit dalam melakukan prosedur yang memadai untuk memastikan bahwa transaksi afiliasi dilaksanakan sesuai dengan praktik bisnis yang berlaku umum antara lain dilakukan dengan memenuhi prinsip transaksi yang wajar (*armslength principle*); g. Untuk transaksi afiliasi atau transaksi material yang merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan, ditambahkan penjelasan bahwa transaksi afiliasi atau transaksi material tersebut merupakan kegiatan usaha yang dijalankan dalam rangka menghasilkan pendapatan usaha dan dijalankan secara rutin, berulang, dan/atau berkelanjutan; Dalam hal transaksi afiliasi atau transaksi material dimaksud telah diungkapkan dalam Laporan Keuangan Tahunan, ditambahkan informasi mengenai rujukan pengungkapan dalam Laporan Keuangan Tahunan tersebut. h. Untuk pengungkapan transaksi afiliasi dan/atau transaksi benturan kepentingan yang merupakan hasil pelaksanaan transaksi afiliasi dan/atau transaksi benturan kepentingan yang telah disetujui pemegang saham independen, ditambahkan informasi mengenai tanggal pelaksanaan RUPS yang menyetujui transaksi afiliasi dan/atau transaksi benturan kepentingan tersebut; dan i. Dalam hal tidak terdapat transaksi afiliasi dan/atau transaksi benturan kepentingan, maka diungkapkan mengenai hal tersebut.	**143; 146; 151**
Material information (if any), including investment, expansion, divestment, business merger/ consolidation, acquisition, debt/capital restructuring, material transactions, affiliate transactions, and conflict of interest transactions, which occurred in the financial year.	a. Transaction date, value, and object; b. The name of the party making the transaction; c. Nature of affiliate relationship (if any); d. Explanation of the fairness of transaction; e. Fulfillment of related provisions; and f. In the event that there is an affiliation relationship, apart from disclosing the information referred to in letter a) through letter e), the Issuer or Public Company shall also disclose information on: 1) The statement of the board of directors that the affiliated transactions have gone through adequate procedures to ensure that the affiliated transactions are carried out in accordance with the generally accepted business practices, among others, conducted according to fair transaction principles (arm's length principle); and 2) The role of the board of commissioners and audit committee in carrying out adequate procedures to ensure that the affiliated transactions are carried out in accordance with the generally accepted business practices, among others, conducted according to fair transaction principles (arm's length principle); g. For affiliate transactions or material transactions which are business activities carried out in order to generate business income and are carried out routinely, repeatedly, and/or continuously, an explanation is added that the affiliated transactions or material transactions are business activities carried out in order to generate business income and are carried out routinely, repeatedly, and/or continuously; In the event that the affiliated transactions or material transactions referred to have been disclosed in the annual financial statements, information is added regarding references to disclosure in the said annual financial statements. h. For disclosure of affiliated transactions and/or conflict of interest transactions which are the result of executing affiliated transactions and/or conflict of interest transactions that have been approved by independent shareholders, information is added regarding the date of the GMS that approves the said affiliated transactions and/or conflict of interest transactions; and i. In the event that there are no affiliated transactions and/or conflict of interest transactions, this shall be disclosed.	

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16. Perubahan ketentuan peraturan perundang-undangan yang berpengaruh signifikan terhadap Emiten atau Perusahaan Publik dan dampaknya terhadap Laporan Keuangan (jika ada). Amendments to provisions of laws and regulations that have a significant impact on the Issuer or Public Company and the impact on the Financial Statements (if any).		**152**
17. Perubahan kebijakan akuntansi, alasan dan dampaknya terhadap Laporan Keuangan (jika ada). Changes to accounting policies, reasons, and their impact on Financial Statements (if any).		**156**
Tata Kelola Emiten atau Perusahaan Publik **Governance of Issuers or Public Companies**		
1. Rapat Umum Pemegang Saham (RUPS). General Meeting of Shareholders (GMS).	a. Informasi mengenai keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku meliputi: 1) keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang direalisasikan pada tahun buku; dan 2) keputusan RUPS pada tahun buku dan 1 (satu) tahun sebelum tahun buku yang belum direalisasikan beserta alasan belum direalisasikan; b. Dalam hal Emiten atau Perusahaan Publik menggunakan pihak independen dalam pelaksanaan RUPS untuk melakukan perhitungan suara, maka diungkapkan mengenai hal tersebut. a. Information regarding GMS resolutions in the financial year and 1 (one) year before the financial year that includes: 1) GMS resolutions in the financial year and 1 (one) year prior to the financial year realized in the financial year; and 2) GMS resolutions in the financial year and 1 (one) year prior to the financial year which have not been realized and the reasons for not being realized; b. In the event that an Issuer or Public Company uses an independent party in the implementation of the GMS to count the votes, this matter shall be disclosed.	**180**
2. Direksi.	a. Tugas dan tanggung jawab masing-masing anggota Direksi; Informasi mengenai tugas dan tanggung jawab masing-masing anggota Direksi diuraikan dan dapat disajikan dalam bentuk tabel; b. Pernyataan bahwa Direksi memiliki pedoman atau piagam (charter) Direksi; c. Kebijakan dan pelaksanaan frekuensi rapat Direksi, rapat Direksi bersama Dewan Komisaris, dan tingkat kehadiran anggota Direksi dalam rapat tersebut termasuk kehadiran dalam RUPS; Informasi tingkat kehadiran anggota Direksi dalam rapat Direksi, rapat Direksi bersama Dewan Komisaris, atau RUPS dapat disajikan dalam bentuk tabel. d. Pelatihan dan/atau peningkatan kompetensi anggota Direksi: 1) Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Direksi, termasuk program orientasi bagi anggota Direksi yang baru diangkat (jika ada); dan 2) Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Direksi dalam tahun buku (jika ada); e. Penilaian Direksi terhadap kinerja komite yang mendukung pelaksanaan tugas Direksi pada tahun buku paling sedikit memuat: 1) Prosedur penilaian kinerja; dan 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan f. Dalam hal Emiten atau Perusahaan Publik tidak memiliki komite yang mendukung pelaksanaan tugas Direksi, maka diungkapkan mengenai hal tersebut.	**192; 198; 205**

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Board of Directors.	a. Duties and responsibilities of each member of the Board of Directors; Information regarding the duties and responsibilities of each member of the Board of Directors is described and can be presented in tabular form; b. Statement that the Board of Directors has Board of Directors guidelines or charter; c. Policy and frequency of Board of Directors' meetings, Board of Directors' joint meetings with the Board of Commissioners, and the attendance level of Board of Directors' members at these meetings including attendance at the GMS; Information on the attendance level of Board of Directors' members at Board of Directors' meetings, Board of Directors' joint meetings with the Board of Commissioners, or the GMS can be presented in tabular form. d. Training and/or competency development for Board of Directors' members: 1) Policy on training and/or competency development for Board of Directors' members, including an orientation program for newly appointed members of the Board of Directors (if any); and 2) Training and/or competency development programs attended by the Board of Directors' members in the financial year (if any); e. The Board of Directors' assessment of the performance of committees that support the implementation of Board of Directors' duties in the financial year that contains at least: 1) Performance assessment procedures; and 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings; and f. In the event that the Issuer or Public Company does not have a committee that supports the implementation of Board of Directors' duties, this shall be disclosed.	
3. Dewan Komisaris.	a. Tugas dan tanggung jawab Dewan Komisaris; b. Pernyataan bahwa Dewan Komisaris memiliki pedoman atau piagam (*charter*) Dewan Komisaris; c. Kebijakan dan pelaksanaan frekuensi rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi dan tingkat kehadiran anggota Dewan Komisaris dalam rapat tersebut termasuk kehadiran dalam RUPS; Informasi tingkat kehadiran anggota Dewan Komisaris dalam rapat Dewan Komisaris, rapat Dewan Komisaris bersama Direksi, atau RUPS dapat disajikan dalam bentuk tabel. d. Pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris: 1) Kebijakan pelatihan dan/atau peningkatan kompetensi anggota Dewan Komisaris, termasuk program orientasi bagi anggota Dewan Komisaris yang baru diangkat (jika ada); dan 2) Pelatihan dan/atau peningkatan kompetensi yang diikuti anggota Dewan Komisaris dalam tahun buku (jika ada); e. Penilaian kinerja Direksi dan Dewan Komisaris serta masing-masing anggota Direksi dan anggota Dewan Komisaris, paling sedikit memuat: 1) Prosedur pelaksanaan penilaian kinerja; 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat; dan 3) Pihak yang melakukan penilaian; dan f. Penilaian Dewan Komisaris terhadap kinerja Komite yang mendukung pelaksanaan tugas Dewan Komisaris pada tahun buku meliputi: 1) Prosedur penilaian kinerja; dan 2) Kriteria yang digunakan seperti capaian kinerja selama tahun buku, kompetensi dan kehadiran dalam rapat.	**185; 198; 205**

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Board of Commissioners.	a. Duties and responsibilities of the Board of Commissioners; b. Statement that the Board of Commissioners has Board of Commissioners guidelines or charter; c. Policy and frequency of Board of Commissioners' meetings, Board of Commissioners' joint meetings with the Board of Directors, and the attendance level of Board of Commissioners' members at these meetings including attendance at the GMS; Information on the attendance level of Board of Commissioners' members at Board of Commissioners' meetings, meetings between the Board of Commissioners and the Board of Directors, or the GMS can be presented in tabular form. d. Training and/or competency development for Board of Commissioners' members: 1) Policy on training and/or competency development for Board of Commissioners' members, including an orientation program for newly appointed members of the Board of Commissioners (if any); and 2) Training and/or competency development programs attended by the Board of Commissioners' members in the financial year (if any); e. Assessment of the Board of Directors' performance and the Board of Commissioners as well as of each member of the Board of Directors and the Board of Commissioners, that contains at least: 1) Performance assessment procedures 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings; and 3) The assessor; and f. The Board of Commissioners' assessment of the performance of Committees that support the implementation of Board of Commissioners' duties in the financial year that contains at least: 1) Performance assessment procedures; and 2) The criteria used such as performance achievements during the financial year, competence, and attendance at meetings.	
4. Nominasi dan remunerasi Direksi dan Dewan Komisaris.	a. Prosedur nominasi, meliputi uraian singkat mengenai kebijakan dan proses nominasi anggota Direksi dan/atau anggota Dewan Komisaris; dan b. Prosedur dan pelaksanaan remunerasi Direksi dan Dewan Komisaris, antara lain: 1) Prosedur penetapan remunerasi Direksi dan Dewan Komisaris; 2) Struktur remunerasi Direksi dan Dewan Komisaris seperti, gaji, tunjangan, tantiem/bonus dan lainnya; dan 3) Besarnya remunerasi masing-masing anggota Direksi dan anggota Dewan Komisaris; Pengungkapan informasi dapat disajikan dalam bentuk tabel.	**217**
Nomination and remuneration of the Board of Directors and Board of Commissioners.	a. Nomination procedures, including a brief description of the policies and nomination process for members of the Board of Directors and/or members of the Board of Commissioners; and b. Procedures and implementation of remuneration for the Board of Directors and Board of Commissioners, including: 1) Procedures for determining remuneration for the Board of Directors and Board of Commissioners; 2) Remuneration structure for the Board of Directors and Board of Commissioners such as salaries, allowances, tantiem/bonuses, and others; and 3) Remuneration amount for each member of the Board of Directors and members of the Board of Commissioners; Disclosure of information can be presented in tabular form.	

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5. Dewan Pengawas Syariah, bagi Emiten atau Perusahaan Publik yang menjalankan kegiatan usaha berdasarkan prinsip syariah sebagaimana tertuang dalam anggaran Dasar. Sharia Supervisory Board, for Issuers or Public Companies that carry out business activities based on sharia principles as stated in the articles of association.	a. Nama; b. Dasar hukum pengangkatan Dewan Pengawas Syariah; c. Periode penugasan Dewan Pengawas Syariah; d. Tugas dan tanggung jawab Dewan Pengawas Syariah; dan e. Frekuensi dan cara pemberian nasihat dan saran serta pengawasan pemenuhan prinsip syariah di pasar modal terhadap Emiten atau Perusahaan Publik. a. Name; b. The legal basis of appointment of the Sharia Supervisory Board; c. The assignment period of the Sharia Supervisory Board; d. The duties and responsibilities of the Sharia Supervisory Board; and e. Frequency and method of providing advice and suggestions as well as supervising compliance with sharia principles in the capital market applicable to Issuers or Public Companies.	N/A
6. Komite Audit. Audit Committee.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; f. Periode dan masa jabatan anggota Komite Audit; g. Pernyataan independensi Komite Audit; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); i. Kebijakan dan pelaksanaan frekuensi rapat Komite Audit dan tingkat kehadiran anggota Komite Audit dalam rapat tersebut; dan j. Pelaksanaan kegiatan Komite Audit pada tahun buku sesuai dengan yang dicantumkan dalam pedoman atau piagam (*charter*) Komite Audit. a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the Board of Commissioners, members of the Board of Directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the Issuer or Public Company; f. Period and term of Audit Committee members; g. Audit Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); i. Policy and frequency of Audit Committee's meetings and the attendance level of Audit Committee's members in these meetings; and j. Implementation of Audit Committee activities in the financial year according to what is stated in the Audit Committee guidelines or charter.	239

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7. Komite atau fungsi nominasi dan remunerasi Emiten atau Perusahaan Publik. Nomination and remuneration committee or function of Issuer or Public Company.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; f. Periode dan masa jabatan anggota komite; g. Pernyataan independensi komite; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); i. Uraian tugas dan tanggung jawab; j. Pernyataan bahwa telah memiliki pedoman atau piagam (charter); k. Kebijakan dan pelaksanaan frekuensi rapat dan tingkat kehadiran anggota dalam rapat tersebut; l. Uraian singkat pelaksanaan kegiatan pada tahun buku; dan m. Dalam hal tidak dibentuk Komite Nominasi dan Remunerasi, Emiten atau Perusahaan Publik cukup mengungkapkan informasi sebagaimana dimaksud dalam huruf i) sampai dengan huruf l) dan mengungkapkan: 1) Alasan tidak dibentuknya komite; dan 2) Pihak yang melaksanakan fungsi nominasi dan remunerasi. a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the Board of Commissioners, members of the Board of Directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the Issuer or Public Company; f. Period and term of committee members; g. Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); i. Description of duties and responsibilities; j. Statement that the committee already has a guideline or charter; k. Policy and frequency of meetings and the attendance level of members at the meetings; l. A brief description of the implementation of activities in the financial year; and m. In the event that a Nomination and Remuneration Committee is not formed, it is sufficient for the Issuer or Public Company to disclose the information referred to in letter i) to letter l) and disclose: 1) The reasons for not forming the committee; and 2) Party carrying out nomination and remuneration functions.	**232**
8. Komite lain yang dimiliki Emiten atau Perusahaan Publik dalam rangka mendukung fungsi dan tugas Direksi (jika ada) dan/atau komite yang mendukung fungsi dan tugas Dewan Komisaris.	a. Nama dan jabatannya dalam keanggotaan komite; b. Usia; c. Kewarganegaraan; d. Riwayat pendidikan; e. Riwayat jabatan, meliputi informasi: 1) Dasar hukum penunjukan sebagai anggota komite; 2) Rangkap jabatan, baik sebagai anggota Dewan Komisaris, anggota Direksi, dan/atau anggota komite serta jabatan lainnya (jika ada); dan 3) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; f. Periode dan masa jabatan anggota komite; g. Pernyataan independensi komite; h. Pelatihan dan/atau peningkatan kompetensi yang telah diikuti dalam tahun buku (jika ada); dan i. Uraian tugas dan tanggung jawab; j. Pernyataan bahwa telah memiliki pedoman atau piagam (charter) komite; k. Kebijakan dan pelaksanaan frekuensi rapat komite dan tingkat kehadiran anggota komite dalam rapat tersebut; dan l. Uraian singkat pelaksanaan kegiatan komite pada tahun buku.	**225; 245**

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Other committees established by Issuers or Public Companies in order to support the Board of Directors' functions and duties (if any) and/or committees that support the Board of Commissioners' functions and duties.	a. Name and position in committee; b. Age; c. Citizenship; d. Educational history; e. Position history, including information on: 1) Legal basis of appointment as committee member; 2) Concurrent positions, as members of the Board of Commissioners, members of the Board of Directors, and/or committee members and other positions (if any); and 3) Work experience and time period inside and outside the Issuer or Public Company; f. Period and term of committee members; g. Committee independency statement; h. Training and/or competency development programs attended in the financial year (if any); and i. Description of duties and responsibilities; j. Statement that the committee already has a guideline or charter; k. Policy and frequency of committee's meetings and the attendance level of committee members at meetings; and l. A brief description of the implementation of committee's activities in the financial year.	
9. Sekretaris Perusahaan. Corporate Secretary.	a. Nama; b. Domisili; c. Riwayat jabatan, meliputi: 1) Dasar hukum penunjukan sebagai Sekretaris Perusahaan; dan 2) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; d. Riwayat pendidikan; e. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; dan f. Uraian singkat pelaksanaan tugas Sekretaris Perusahaan pada tahun buku. a. Name; b. Domicile; c. Position history, including: 1) Legal basis of appointment as Corporate Secretary; and 2) Work experience and time period inside and outside the Issuer or Public Company; d. Educational history; e. Training and/or competency development programs attended in the financial year; and f. Brief description of the implementation of Corporate Secretary's duties in the financial year.	**262**
10.Unit Audit Internal.	a. Nama Kepala Unit Audit Internal; b. Riwayat jabatan, meliputi: 1) Dasar hukum penunjukan sebagai Kepala Unit Audit Internal; dan 2) Pengalaman kerja beserta periode waktunya baik di dalam maupun di luar Emiten atau Perusahaan Publik; c. Kualifikasi atau sertifikasi sebagai profesi Audit Internal (jika ada); d. Pelatihan dan/atau peningkatan kompetensi yang diikuti dalam tahun buku; e. Struktur dan kedudukan Unit Audit Internal; f. Uraian tugas dan tanggung jawab; g. Pernyataan bahwa telah memiliki pedoman atau piagam (charter) Unit Audit Internal; dan h. Uraian singkat pelaksanaan tugas Unit Audit Internal pada tahun buku termasuk kebijakan dan pelaksanaan frekuensi rapat dengan Direksi, Dewan Komisaris, dan/atau Komite Audit.	**265**

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Internal Audit Unit.	a. Name of the Head of Internal Audit Unit; b. Position history, including: 1) Legal basis of appointment as Head of Internal Audit Unit; and 2) Work experience and time period inside and outside the Issuer or Public Company; c. Qualification or certification for Internal Audit profession (if any); d. Training and/or competency development programs attended in the financial year; e. The structure and position of the Internal Audit Unit; f. Description of duties and responsibilities; g. Statement that the Internal Audit Unit already has a guideline or charter; and h. A brief description of the implementation of Internal Audit Unit's duties in the financial year including the policies and frequency of meetings with the Board of Directors, Board of Commissioners, and/or Audit Committee.	
11. Uraian mengenai sistem pengendalian internal (*internal control*) yang diterapkan oleh Emiten atau Perusahaan Publik. Description of internal control system implemented by Issuers or Public Companies.	a. Pengendalian keuangan dan operasional, serta kepatuhan terhadap peraturan perundang-undangan lainnya; b. Tinjauan atas efektivitas sistem pengendalian internal; dan c. Pernyataan Direksi dan/atau Dewan Komisaris atas kecukupan sistem pengendalian internal. a. Financial and operational control, as well as compliance with other laws and regulations; b. Review of the effectiveness of internal control system; and c. Statement of the board of Directors and/or Board of Commissioners on the adequacy of the internal control system.	**273**
12. Sistem manajemen risiko yang diterapkan oleh Emiten atau Perusahaan Publik. Risk management system implemented by Issuers or Public Companies.	a. Gambaran umum mengenai sistem manajemen risiko Emiten atau Perusahaan Publik; b. Jenis risiko dan cara pengelolaannya; c. Tinjauan atas efektivitas sistem manajemen risiko Emiten atau Perusahaan Publik; dan d. Pernyataan Direksi dan/atau Dewan Komisaris atau Komite Audit atas kecukupan sistem manajemen risiko. a. General description of the Issuer's or Public Company's risk management system; b. Types of risks and how to manage them; c. Review of the effectiveness of the Issuer's or Public Company's risk management system; and d. Statement of the Board of Directors and/or Board of Commissioners or the Audit Committee on the adequacy of the risk management system.	**349**
13. Perkara hukum yang berdampak material yang dihadapi oleh Emiten atau Perusahaan Publik, entitas anak, anggota Direksi dan anggota Dewan Komisaris (jika ada). Legal cases with material impacts faced by Issuers or Public Companies, subsidiaries, members of the Board of Directors, and members of the Board of Commissioners (if any).	a. Pokok perkara/gugatan; b. Status penyelesaian perkara/gugatan; dan c. Pengaruhnya terhadap kondisi Emiten atau Perusahaan Publik. a. Case profile/lawsuit; b. The settlement status of the case/lawsuit; and c. The impact on the Issuers or Public Companies' condition.	**286**
14. Informasi tentang sanksi administratif/sanksi yang dikenakan kepada Emiten atau Perusahaan Publik, anggota Dewan Komisaris dan anggota Direksi, oleh Otoritas Jasa Keuangan dan otoritas lainnya pada tahun buku (jika ada). Information on administrative sanctions/sanctions imposed on Issuers or Public Companies, members of the Board of Commissioners. and members of the Board of Directors, by the Financial Services Authority and other authorities in the financial year (if any).		**292**
15. Informasi mengenai kode etik Emiten atau Perusahaan Publik.	a. Pokok-pokok kode etik; b. Bentuk sosialisasi kode etik dan upaya penegakannya; dan c. Pernyataan bahwa kode etik berlaku bagi anggota Direksi, anggota Dewan Komisaris, dan karyawan Emiten atau Perusahaan Publik.	**297**

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Information regarding the code of conduct of Issuers or Public Companies.	a. The principles of the code of conduct; b. The form of dissemination of the code of conduct and efforts to enforce it; and c. A statement that the code of conduct applies to members of the Board of Directors, members of the Board of Commissioners, and employees of Issuers or Public Companies.	
16. Uraian singkat mengenai kebijakan pemberian kompensasi jangka panjang berbasis kinerja kepada manajemen dan/atau karyawan yang dimiliki oleh Emiten atau Perusahaan Publik (jika ada), antara lain berupa program kepemilikan saham oleh manajemen (*management stock ownership program*/MSOP) dan/atau program kepemilikan saham oleh karyawan (*employee stock ownership program*/ESOP). A brief description of the policy of providing performance-based long-term compensation to management and/or employees owned by Issuers or Public Companies (if any), including but not limited to management stock ownership program (MSOP) and/or employee stock ownership program (ESOP).	Dalam hal pemberian kompensasi berupa program kepemilikan saham oleh manajemen (*management stock ownership program*/MSOP) dan/atau program kepemilikan saham oleh karyawan (*employee stock ownership program*/ESOP), informasi yang diungkapkan paling sedikit memuat: a. Jumlah saham dan/atau opsi; b. Jangka waktu pelaksanaan; c. Persyaratan karyawan dan/atau manajemen yang berhak; dan d. Harga pelaksanaan atau penentuan harga pelaksanaan. In terms of providing compensation in the form of management stock ownership program (MSOP) and/or employee stock ownership program (ESOP), the information disclosed shall contain at least: a. Number of shares and/or options; b. Implementation period; c. Requirements for eligible employee and/or management; and d. Execution price or determination of execution price.	**301**
17. Uraian singkat mengenai kebijakan pengungkapan informasi. A brief description of the information disclosure policy.	a. Kepemilikan saham anggota Direksi dan anggota Dewan Komisaris paling lambat 3 (tiga) hari kerja setelah terjadinya kepemilikan atau setiap perubahan kepemilikan atas saham Perusahaan Terbuka; dan b. Pelaksanaan atas kebijakan dimaksud. a. Share ownership of members of the Board of Directors and members of the Board of Commissioners no later than 3 (three) working days after the ownership or any change in ownership of the Public Company's shares; and b. Implementation of the said policy.	**301**
18. Uraian mengenai sistem pelaporan pelanggaran (*whistleblowing system*) di Emiten atau Perusahaan Publik. Description of the violation reporting system (whistleblowing system) in Issuers or Public Companies.	a. Cara penyampaian laporan pelanggaran; b. Perlindungan bagi pelapor; c. Penanganan pengaduan; d. Pihak yang mengelola pengaduan; dan e. Hasil dari penanganan pengaduan, paling sedikit: 1) Jumlah pengaduan yang masuk dan diproses dalam tahun buku; dan 2) Tindak lanjut pengaduan. Dalam hal Emiten atau Perusahaan Publik tidak memiliki sistem pelaporan pelanggaran (*whistleblowing system*), maka diungkapkan mengenai hal tersebut. a. Method of submission of violation reports; b. Protection for reporters; c. How to handle the complaints; d. Parties who manage complaints; and e. The results of handling complaints, at least: 1) Number of complaints received and processed in the financial year; and 2) The complaint follow-up. In the event that the Issuer or Public Company does not have a violation reporting system (whistleblowing system), then this matter shall be disclosed.	**304**
19. Uraian mengenai kebijakan anti-korupsi Emiten atau Perusahaan Publik. Description of the Issuer's or Public Company's anti-corruption policy.	a. Program dan prosedur yang dilakukan dalam mengatasi praktik korupsi, balas jasa (kickbacks), fraud, suap dan/atau gratifikasi dalam Emiten atau Perusahaan Publik; dan b. Pelatihan/sosialisasi anti-korupsi kepada karyawan Emiten atau Perusahaan Publik. Dalam hal Emiten atau Perusahaan Publik tidak memiliki kebijakan anti-korupsi, maka dijelaskan alasan tidak dimilikinya kebijakan dimaksud. a. Programs and procedures carried out in overcoming corrupt practices, remuneration (kickbacks), fraud, bribes, and/or gratuities in Issuers or Public Companies; and b. Anti-corruption training/dissemination for employees of Issuers or Public Companies. If the Issuer or Public Company does not have an anti-corruption policy, the reasons for not having such a policy shall be explained.	**302**

Kriteria Criteria	Penjelasan Explanation	Halaman Page
20.Penerapan atas pedoman tata kelola Perusahaan Terbuka bagi Emiten yang menerbitkan efek bersifat ekuitas atau Perusahaan Publik. Implementation of Public Company governance guidelines for Issuers that issue equity securities or Public Companies.	a. Pernyataan mengenai rekomendasi yang telah dilaksanakan; dan/atau b. Penjelasan atas rekomendasi yang belum dilaksanakan, disertai alasan dan alternatif pelaksanaannya (jika ada). Pengungkapan informasi dapat disajikan dalam bentuk tabel. a. Statement regarding recommendations that have been implemented; and/or b. Explanation of recommendations that have not been implemented, accompanied by reasons and alternatives for implementation (if any). Disclosure of information can be presented in tabular form.	309
Tanggung Jawab Sosial dan Lingkungan Emiten atau Perusahaan Publik **Social and Environmental Responsibility of Issuers or Public Companies**		
1. Informasi yang diungkapkan dalam bagian tanggung jawab sosial dan lingkungan merupakan Laporan Keberlanjutan (*Sustainability Report*) sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan No. 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik. The information disclosed in the social and environmental responsibility section is a Sustainability Report as referred to in the Financial Services Authority Regulation No. 51/POJK.03/2017 on Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.	a. Penjelasan strategi keberlanjutan; b. Ikhtisar aspek keberlanjutan (ekonomi, sosial, dan lingkungan hidup); c. Profil singkat Emiten atau Perusahaan Publik; d. Penjelasan Direksi; e. Tata kelola keberlanjutan; f. Kinerja keberlanjutan; g. Verifikasi tertulis dari pihak independen, jika ada; h. Lembar umpan balik (feedback) untuk pembaca, jika ada; dan i. Tanggapan emiten atau perusahaan publik terhadap umpan balik laporan tahun sebelumnya. a. Explanation of sustainability strategy; b. An overview of sustainability aspects (economic, social, and environmental); c. Brief profile of the issuer or public company; d. Explanation from the board of directors; e. Sustainability governance; f. Sustainability performance; g. Written verification from an independent party, if any; h. Feedback form for readers, if any; and i. The issuer or public company's response to the previous year's report feedback.	476
2. Laporan Keberlanjutan sebagaimana dimaksud pada angka 1), harus disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. The Sustainability Report as referred to in number 1), must be prepared in accordance with the Technical Guidelines for Preparing Sustainability Reports For Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular.		√
3. Informasi Laporan Keberlanjutan (*Sustainability Report*) pada angka 1) dapat: Sustainability Report information in number 1) can:	a. Diungkapkan pada bagian lain yang relevan di luar bagian tanggung jawab sosial dan lingkungan, seperti penjelasan Direksi terkait Laporan Keberlanjutan diungkapkan dalam bagian terkait Laporan Direksi; dan/atau b. Merujuk pada bagian lain di luar bagian tanggung jawab sosial dan lingkungan dengan tetap mengacu pada Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini, seperti profil Emiten atau Perusahaan Publik. a. Be disclosed in other relevant sections outside the social and environmental responsibility section, such as the Board of Directors' explanation regarding the Sustainability Report is disclosed in the related section of the Board of Directors' Report; and/or b. Refer to other sections outside the social and environmental responsibility section while still referring to the Technical Guidelines for Preparing Sustainability Report For Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular, such as the profile of the Issuer or Public Company.	√

Kriteria Criteria	Penjelasan Explanation	Halaman Page
4. Laporan Keberlanjutan (*Sustainability Report*) sebagaimana dimaksud pada angka 1) merupakan bagian yang tidak terpisahkan dari Laporan Tahunan namun dapat disajikan secara terpisah dengan Laporan Tahunan. Sustainability Report as referred to in number 1) is an integral part of the Annual Report but can be presented separately from the Annual Report.		√
5. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, informasi yang diungkapkan dalam Laporan Keberlanjutan dimaksud harus: In the event that the Sustainability Report is presented separately from the Annual Report, the information disclosed in the Sustainability Report must:	a. Memuat seluruh informasi sebagaimana dimaksud pada angka 1); dan b. Disusun sesuai Pedoman Teknis Penyusunan Laporan Keberlanjutan (*Sustainability Report*) Bagi Emiten dan Perusahaan Publik sebagaimana tercantum dalam Lampiran II yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. a. Contain all the information referred to in number 1); and b. Be prepared according to Technical Guidelines for Preparing Sustainability Report for Issuers and Public Companies as listed in Appendix II which is an integral part of this Financial Services Authority Circular.	√
6. Dalam hal Laporan Keberlanjutan disajikan secara terpisah dengan Laporan Tahunan, maka dalam bagian tanggung jawab sosial dan lingkungan memuat informasi bahwa informasi mengenai tanggung jawab sosial dan lingkungan telah diungkapkan dalam Laporan Keberlanjutan yang disajikan secara terpisah dari Laporan Tahunan. In the event that the Sustainability Report is presented separately from the Annual Report, then the social and environmental responsibility section contains information that information regarding social and environmental responsibility has been disclosed in the Sustainability Report which is presented separately from the Annual Report.		√
7. Penyampaian Laporan Keberlanjutan (*Sustainability Report*) yang disajikan secara terpisah dengan Laporan Tahunan harus disampaikan bersamaan dengan penyampaian Laporan Tahunan. Submission of Sustainability Report presented separately from the Annual Report must be submitted together with the submission of the Annual Report.		√
Laporan Keuangan Tahunan yang Telah Diaudit **Audited Annual Financial Statements**		
Laporan Keuangan Tahunan yang dimuat dalam Laporan Tahunan disusun sesuai dengan standar akuntansi keuangan di Indonesia dan telah diaudit oleh akuntan publik yang terdaftar di Otoritas Jasa Keuangan. Laporan Keuangan Tahunan dimaksud memuat pernyataan mengenai pertanggungjawaban atas Laporan Keuangan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai tanggung jawab Direksi atas Laporan Keuangan atau peraturan perundang-undangan di sektor pasar modal yang mengatur mengenai laporan berkala perusahaan efek dalam hal Emiten merupakan perusahaan efek. The Annual Financial Statements included in the Annual Report are prepared in accordance with Indonesian financial accounting standards and have been audited by a public accountant registered with the Financial Services Authority. The Annual Financial Statements contain a statement regarding accountability for Financial Statements as stipulated in the Financial Services Authority Regulation regarding the responsibility of the Board of Directors for Financial Statements or laws and regulations in the capital market sector which regulate periodic reports of securities companies in the event that the Issuer is a securities company.		**555**

Kriteria Criteria	Penjelasan Explanation	Halaman Page
Surat Pernyataan Anggota Direksi dan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan **Statement of Members of the Board of Directors and Members of the Board of Commissioners regarding Responsibility for the Annual Report**		
Surat pernyataan anggota Direksi dan anggota Dewan Komisaris tentang tanggung jawab atas Laporan Tahunan disusun sesuai dengan format Surat Pernyataan Anggota Direksi dan Anggota Dewan Komisaris tentang Tanggung Jawab atas Laporan Tahunan sebagaimana tercantum dalam Lampiran I yang merupakan bagian tidak terpisahkan dari Surat Edaran Otoritas Jasa Keuangan ini. Statements of members of the Board of Directors and members of the Board of Commissioners regarding responsibility for the Annual Report are prepared in accordance with the format of Statement Letters of Members of the Board of Directors and Board of Commissioners regarding Responsibility for Annual Reports as listed in Appendix I which is an integral part of this Financial Services Authority Circular.		**58**

Laporan Keuangan Tanggal 31 Desember 2025

Financial Statements as of 31 December 2025



PT Bank Victoria International Tbk

Laporan keuangan tanggal 31 Desember 2025
dan untuk tahun yang berakhir pada tanggal tersebut
beserta laporan auditor independen/
Financial statements as of December 31, 2025 and
for the year then ended with independent auditor's report

The original financial statements included herein are in Indonesian language.

PT BANK VICTORIA INTERNATIONAL TBK
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2025
DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN

PT BANK VICTORIA INTERNATIONAL TBK
FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2025
AND FOR THE YEAR THEN ENDED
WITH INDEPENDENT AUDITOR'S REPORT

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bank victoria

SURAT PERNYATAAN DEWAN DIREKSI TENTANG TANGGUNG JAWAB ATAS LAPORAN KEUANGAN TANGGAL 31 DESEMBER 2025 DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT PT BANK VICTORIA INTERNATIONAL Tbk

BOARD OF DIRECTORS' STATEMENT REGARDING THE RESPONSIBILITY FOR THE FINANCIAL STATEMENTS AS OF DECEMBER 31, 2025 AND FOR THE YEAR THEN ENDED PT BANK VICTORIA INTERNATIONAL Tbk

Kami, yang bertanda tangan di bawah ini :

We, the undersigned below:

1.	Nama	:	Achmad Friscantono MBA	: *Name*
	Alamat kantor	:	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	: *Office address*
	Alamat domisili atau sesuai KTP	:	Jl. Benda II No.7, RT 002/RW 004, Kel Pulo, Kec.Kebayoran Baru, Jakarta	: *Domicile address or address according to ID*
	Nomor telepon	:	021-522 8888	: *Telephone number*
	Jabatan	:	Direktur Utama/*President Director*	: *Title*
2.	Nama	:	Debora Wahjutirto Tanoyo	: *Name*
	Alamat kantor	:	Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23, Jakarta Selatan 12930	: *Office address*
	Alamat domisili atau sesuai KTP	:	Permata Hijau Blok E/41 RT 011/004, Grogol Utara, Kebayoran Lama	: *Domicile address or address according to ID*
	Nomor telepon	:	021-522-8888	: *Telephone number*
	Jabatan	:	Direktur Keuangan / *Finance Director*	: *Title*

menyatakan bahwa:

declare that:

1. Kami bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Victoria International Tbk;

1. *We are responsible for the preparation and presentation of the financial statements of PT Bank Victoria International Tbk;*

2. Laporan keuangan PT Bank Victoria International Tbk telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;

2. *The financial statements of PT Bank Victoria International Tbk have been prepared and presented in accordance with Indonesian Financial Accounting Standards;*

3. a. Semua informasi dalam laporan keuangan PT Bank Victoria International Tbk telah dimuat secara lengkap dan benar; dan

   b. Laporan keuangan PT Bank Victoria International Tbk tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material;

3. a. *All information in the financial statements of PT Bank Victoria International Tbk have been fully disclosed in a complete and truthful manner; and*

   b. *The financial statements of PT Bank Victoria International Tbk do not contain any incorrect information or material fact, nor do they omit any information or material fact;*

4. Kami bertanggung jawab atas sistem pengendalian internal dalam PT Bank Victoria International Tbk.

4. *We are responsible for the internal control system of PT Bank Victoria International Tbk.*

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is made truthfully.

Jakarta, 9 Maret/*March 9, 2026*
Atas nama dan mewakili Direksi/*For and on behalf of the Board of Directors of*
PT Bank Victoria International Tbk



ACHMAD FRISCANTONO MBA
Direktur Utama/ *President Director*

DEBORA WAHJUTIRTO TANOYO
Direktur Keuangan/ *Finance Director*

Shape the future with confidence

KAP Purwanto Susanti dan Surja

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Jakarta 12190, Indonesia

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ey.com/id

The original report included herein is in the Indonesian language.

Laporan Auditor Independen

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026

Indpendent Auditor's Report

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026

Pemegang Saham, Dewan Komisaris, dan Direksi
PT Bank Victoria International Tbk

The Shareholders and the Boards of Commissioners and Directors
PT Bank Victoria International Tbk

Opini

Kami telah mengaudit laporan keuangan PT Bank Victoria International Tbk ("Bank") terlampir, yang terdiri dari laporan posisi keuangan tanggal 31 Desember 2025, serta laporan laba rugi dan penghasilan komprehensif lain, laporan perubahan ekuitas, dan laporan arus kas untuk tahun yang berakhir pada tanggal tersebut, serta catatan atas laporan keuangan, termasuk informasi kebijakan akuntansi material.

Menurut opini kami, laporan keuangan terlampir menyajikan secara wajar, dalam semua hal yang material, posisi keuangan Bank tanggal 31 Desember 2025, serta kinerja keuangan dan arus kasnya untuk tahun yang berakhir pada tanggal tersebut, sesuai dengan Standar Akuntansi Keuangan di Indonesia.

Opinion

We have audited the accompanying financial statements of PT Bank Victoria International Tbk ("Bank"), which comprise the statement of financial position as of December 31, 2025, and the statement of profit or loss and other comprehensive income, statement of changes in equity, and statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Bank as of December 31, 2025, and its financial performance and 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 ("IAPI"). Tanggung jawab kami menurut standar tersebut diuraikan lebih lanjut dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami. Kami independen terhadap Bank berdasarkan ketentuan etika yang relevan dalam audit kami atas laporan keuangan di Indonesia, dan kami telah memenuhi tanggung jawab etika lainnya berdasarkan ketentuan tersebut. Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini kami.

Basis for opinion

We conducted our audits in accordance with Standards on Auditing established by the Indonesian Institute of Certified Public Accountants ("IICPA"). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements paragraph of our report. We are independent of the Bank in accordance with the ethical requirements relevant to our audits of the financial statements in Indonesia, and we have fulfilled our other ethical responsibilities in accordance with such requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

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The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Indpendent Auditor's Report (continued)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Hal audit utama

Key audit matter

Hal audit utama adalah hal-hal yang, menurut pertimbangan profesional kami, merupakan hal yang paling signifikan dalam audit kami atas laporan keuangan periode kini. Hal audit utama tersebut disampaikan dalam konteks audit kami atas laporan keuangan secara keseluruhan, dan dalam merumuskan opini kami atas laporan keuangan terkait, dan kami tidak menyatakan suatu opini terpisah atas hal audit utama tersebut. Untuk setiap hal audit utama di bawah ini, penjelasan kami tentang bagaimana audit kami merespons hal tersebut disampaikan dalam konteks tersebut.

Key audit matter is those matters that, in our professional judgement, were of most significance in our audit of the financial statements of the current period. Such key audit matter were addressed in the context of our audit of the financial statements taken as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on such key audit matter. For each of the key audit matter below, our description of how our audit addressed such key audit matter is provided in such context.

Kami telah memenuhi tanggung jawab yang diuraikan dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami, termasuk sehubungan dengan hal audit utama yang dikomunikasikan di bawah ini. Oleh karena itu, audit kami mencakup pelaksanaan prosedur yang didesain untuk merespons penilaian kami atas risiko kesalahan penyajian material dalam laporan keuangan terlampir. Hasil prosedur audit kami, termasuk prosedur yang dilakukan untuk merespons hal audit utama di bawah ini, menyediakan basis bagi opini kami atas laporan keuangan terlampir.

We have fulfilled the responsibilities described in the Auditor's Responsibilities for the Audit of the Financial Statements paragraph of our report, including in relation to the key audit matter communicated below. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatements of the accompanying financial statements. The results of our audit procedures, including the procedures performed to address the key audit matter below, provide the basis for our opinion on the accompanying financial statements.

<u>Cadangan kerugian penurunan nilai atas pinjaman yang diberikan</u>

<u>*Allowance for impairment losses of loans*</u>

Penjelasan atas hal audit utama:

Description of the key audit matter:

Pada tanggal 31 Desember 2025, nilai tercatat pinjaman yang diberikan adalah sebesar Rp22,4 triliun, sebelum cadangan penurunan nilai sebesar Rp558,6 miliar. Pengungkapan atas hal ini diuraikan pada Catatan 11 atas laporan keuangan terlampir.

As of December 31, 2025, the balance of loans was amounted to Rp22.4 trillion, before allowance for impairment amounted to Rp558.6 billion. Disclosures of these matters are described in Notes 11 to the accompanying financial statements.

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan adalah hal audit utama bagi kami karena nilai tercatat pinjaman yang diberikan dan cadangan kerugian penurunan nilainya adalah signifikan terhadap laporan keuangan, dan perhitungan cadangan kerugian penurunan nilai tersebut memerlukan penerapan pertimbangan dan estimasi signifikan dari manajemen, yaitu penentuan model untuk menghitung cadangan tersebut, identifikasi eksposur kredit yang mengalami penurunan kualitas kredit yang signifikan, dan penentuan asumsi utama yang digunakan dalam model perhitungan cadangan kerugian penurunan nilai (untuk eksposur yang dinilai secara individu atau kolektif), termasuk faktor-faktor makroekonomi yang bersifat perkiraan masa depan (*forward-looking*).

Allowance for impairment losses of loans is a key audit matter to us because the carrying amounts of loans and the allowance for impairment losses were significant to the financial statements, and the calculation of allowance for impairment losses of loans required application of significant judgment and estimation from the management, such as establishing model to calculate the allowance for impairment, identification of credit exposures with significant deterioration in credit quality, and establishing key assumptions used in the model to calculate allowance for impairment losses (for exposures assessed on an individual or collective basis), which incorporated forward-looking macroeconomic factors.

A member firm of Ernst & Young Global Limited

The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Indpendent Auditor's Report (continued)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Hal audit utama (lanjutan)

Key audit matter (continued)

Cadangan kerugian penurunan nilai atas pinjaman yang diberikan (lanjutan)

Allowance for impairment losses of loans (continued)

Respons audit:

Audit response:

Kami mengevaluasi dan menguji rancangan dan efektivitas pengendalian utama atas proses pemberian pinjaman, penilaian kualitas pinjaman internal secara teratur, serta pencatatan dan pengawasan pinjaman yang diberikan. Kami memperoleh pemahaman tentang metodologi dan model keuangan untuk perhitungan cadangan kerugian penurunan nilai, serta melakukan validasi atas data masukan (*input*), dasar dan asumsi utama yang digunakan dalam menghitung cadangan kerugian penurunan nilai dengan membandingkan ke data historis Bank dan informasi pasar yang dapat diobservasi. Kami juga menguji tiga tahapan kualitas kredit portofolio sesuai dengan kriteria tingkatan (*staging*) yang ditetapkan oleh manajemen untuk pinjaman yang diberikan.

We evaluated and assessed the design and operating effectiveness of key controls over the process of loan origination, regular internal credit quality assessments, and recording and monitoring of the loans. We gained understanding over methodologies and financial model of the calculation of the impairment losses, and validated inputs, bases, and key assumptions used in calculating the allowance for impairment losses by comparing to the Bank's historical data and observable market data. We also tested the classification into the three-stage credit quality of loan portfolios in accordance with staging criteria established by the management regarding loans.

Kami juga menguji konsistensi antara pengalaman historis dan kondisi sekarang dengan kerugian terkini pada portofolio serta menilai kewajaran penyesuaian asumsi masa depan, analisis faktor ekonomi makro, dan beberapa skenario probabilitas tertimbang.

We also evaluated consistency of historic experience and the current circumstances with recent losses in the portfolios and assessed the reasonableness of forward-looking adjustments, macroeconomic factor analysis and probability-weighted multiple scenarios.

Untuk cadangan kerugian penurunan nilai yang ditentukan secara individual, kami mengevaluasi bila identifikasi dilakukan secara tepat waktu terhadap eksposur dengan penurunan kualitas kredit yang signifikan atau yang telah mengalami penurunan nilai. Untuk pinjaman yang diidentifikasi mengalami penurunan nilai, kami menilai asumsi utama atas arus kas masa depan yang akan diterima, termasuk nilai jaminan yang dapat direalisasikan berdasarkan informasi pasar yang tersedia atau penilaian yang dilakukan oleh pakar manajemen atau manajemen sendiri.

With respect to individually assessed impairment losses, we evaluated if timely identification was made for exposures with significant deterioration in credit quality or exposures which have been impaired. For loans identified to be impaired, we assessed key assumptions on the expected futures cash flows, including the value of realizable collateral based on available market information or valuation prepared by the management's expert or the management.

Kami memeriksa akurasi matematis perhitungan cadangan kerugian penurunan nilai dan menilai kecukupan pengungkapan atas hal-hal ini pada laporan keuangan terlampir. Kami melibatkan pakar auditor kami dalam melakukan prosedur-prosedur di atas sesuai dengan keahliannya.

We tested mathematical accuracy of the calculation of allowance for impairment losses and we assessed the adequacy of disclosures for these matters in the notes to the accompanying financial statements. We involved our auditor's experts in the performance of these procedures in accordance with their specific expertise.

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The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Indpendent Auditor's Report (continued)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Informasi lain

Other information

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam Laporan Tahunan 2025 ("Laporan Tahunan") selain laporan keuangan terlampir dan laporan auditor independen kami. Laporan Tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor independen ini.

Management is responsible for the other information. Other information comprises the information included in the 2025 Annual Report ("The Annual Report") other than the accompanying financial statements and our Indpendent Auditor's Report thereon. The Annual Report is expected to be made available to us after the date of this independent auditor's report.

Opini kami atas laporan keuangan terlampir tidak mencakup Laporan Tahunan, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas Laporan Tahunan tersebut.

Our opinion on the accompanying financial statements does not cover the Annual Report, and accordingly, we do not express any form of assurance on the Annual Report.

Sehubungan dengan audit kami atas laporan keuangan terlampir, tanggung jawab kami adalah untuk membaca Laporan Tahunan ketika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah Laporan Tahunan mengandung ketidakkonsistensian material dengan laporan keuangan terlampir atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

In connection with our audit of the accompanying financial statements, our responsibility is to read the Annual Report when it becomes available and, in doing so, consider whether the Annual Report is materially inconsistent with the accompanying financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

Ketika kami membaca Laporan Tahunan, jika kami menyimpulkan bahwa terdapat suatu kesalahan penyajian material di dalamnya, kami diharuskan untuk mengomunikasikan hal tersebut kepada pihak yang bertanggung jawab atas tata kelola dan melakukan tindakan yang tepat berdasarkan peraturan perundang-undangan yang berlaku.

When we read the Annual Report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance and take appropriate actions based on the applicable laws and regulations.

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan

Responsibilities of management and those charged with governance for the financial statements

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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Laporan Auditor Independen (lanjutan)

Indpendent Auditor's Report (continued)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan (lanjutan)

Responsibilities of management and those charged with governance for the financial statements (continued)

Dalam penyusunan laporan keuangan, manajemen bertanggung jawab untuk menilai kemampuan Bank dalam mempertahankan kelangsungan usahanya, mengungkapkan, sesuai dengan kondisinya, hal-hal yang berkaitan dengan kelangsungan usaha, dan menggunakan basis akuntansi kelangsungan usaha, kecuali manajemen memiliki intensi untuk melikuidasi Bank atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

In preparing the financial statements, management is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern, and using the going concern basis of accounting, unless management either intends to liquidate the Bank or to cease its operations, or has no realistic alternative but to do so.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Bank.

Those charged with governance are responsible for overseeing the Bank's financial reporting process.

Tanggung jawab auditor terhadap audit atas laporan keuangan

Auditor's responsibilities for the audit of the financial statements

Tujuan kami adalah untuk memeroleh keyakinan memadai tentang apakah laporan keuangan secara keseluruhan bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan, dan untuk menerbitkan laporan auditor independen yang mencakup opini kami. Keyakinan memadai merupakan suatu tingkat keyakinan tinggi, namun bukan merupakan suatu jaminan bahwa audit yang dilaksanakan berdasarkan Standar Audit yang ditetapkan oleh IAPI akan selalu mendeteksi kesalahan penyajian material ketika hal tersebut ada. Kesalahan penyajian dapat disebabkan oleh kecurangan maupun kesalahan dan dianggap material jika, baik secara individual maupun agregat, dapat diekspektasikan secara wajar akan memengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan tersebut.

Our objectives are to obtain reasonable assurance about whether the financial statements taken as a whole are free from material misstatement, whether due to fraud or error, and to issue an Indpendent Auditor's Report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Standards on Auditing established by the IICPA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

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Laporan Auditor Independen (lanjutan)

Indpendent Auditor's Report (continued)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Auditor's responsibilities for the audit of the financial statements (continued)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga:

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Mengidentifikasi dan menilai risiko kesalahan penyajian material dalam laporan keuangan, baik yang disebabkan oleh kecurangan maupun kesalahan, mendesain dan melaksanakan prosedur audit yang responsif terhadap risiko tersebut, serta memeroleh bukti audit yang cukup dan tepat untuk menyediakan basis bagi opini kami. Risiko tidak terdeteksinya suatu kesalahan penyajian material yang disebabkan oleh kecurangan lebih tinggi dari yang disebabkan oleh kesalahan, karena kecurangan dapat melibatkan kolusi, pemalsuan, penghilangan secara sengaja, pernyataan salah, atau pengabaian atas pengendalian internal.

- *Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to such risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or override of internal control.*

- Memeroleh suatu pemahaman tentang pengendalian internal yang relevan dengan audit untuk mendesain prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal Bank.

- *Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.*

- Mengevaluasi ketepatan kebijakan akuntansi yang digunakan serta kewajaran estimasi akuntansi dan pengungkapan terkait yang dibuat oleh manajemen.

- *Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.*

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Laporan Auditor Independen (lanjutan)

Indpendent Auditor's Report (continued)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Auditor's responsibilities for the audit of the financial statements (continued)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga: (lanjutan)

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also: (continued)

- Menyimpulkan ketepatan penggunaan basis akuntansi kelangsungan usaha oleh manajemen dan, berdasarkan bukti audit yang diperoleh, apakah terdapat suatu ketidakpastian material yang terkait dengan peristiwa atau kondisi yang dapat menyebabkan keraguan signifikan atas kemampuan Bank untuk mempertahankan kelangsungan usahanya. Ketika kami menyimpulkan bahwa terdapat suatu ketidakpastian material, kami diharuskan untuk menarik perhatian dalam laporan auditor independen kami ke pengungkapan terkait dalam laporan keuangan atau, jika pengungkapan tersebut tidak memadai, memodifikasi opini kami. Kesimpulan kami didasarkan pada bukti audit yang diperoleh hingga tanggal laporan auditor independen kami. Namun, peristiwa atau kondisi masa depan dapat menyebabkan Bank tidak dapat mempertahankan kelangsungan usaha.

- *Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our Indpendent Auditor's Report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusion is based on the audit evidence obtained up to the date of our Indpendent Auditor's Report. However, future events or conditions may cause the Bank to cease to continue as a going concern.*

- Mengevaluasi penyajian, struktur, dan isi laporan keuangan secara keseluruhan, termasuk pengungkapannya, dan apakah laporan keuangan mencerminkan transaksi dan peristiwa yang mendasarinya dengan suatu cara yang mencapai penyajian wajar.

- *Evaluate the overall presentation, structure, and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.*

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.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Kami juga memberikan suatu pernyataan kepada pihak yang bertanggung jawab atas tata kelola bahwa kami telah mematuhi ketentuan etika yang relevan mengenai independensi, dan mengomunikasikan kepada pihak tersebut seluruh hubungan, serta hal-hal lain yang dianggap secara wajar berpengaruh terhadap independensi kami, dan, jika relevan, pengamanan terkait.

Dari hal-hal yang dikomunikasikan kepada pihak yang bertanggung jawab atas tata kelola, kami menentukan hal-hal tersebut yang paling signifikan dalam audit atas laporan keuangan periode kini dan oleh karenanya menjadi hal audit utama. Kami menguraikan hal audit utama tersebut dalam laporan auditor independen kami kecuali peraturan perundang-undangan melarang pengungkapan publik tentang hal audit utama tersebut atau ketika, dalam kondisi yang sangat jarang terjadi, kami menentukan bahwa suatu hal audit utama tidak boleh dikomunikasikan dalam laporan auditor independen kami karena konsekuensi yang merugikan dari mengomunikasikan hal tersebut akan diekspektasikan secara wajar melebihi manfaat kepentingan publik atas komunikasi tersebut.

Indpendent Auditor's Report (continued)

Report No. 00129/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matter. We describe such key audit matter in our Indpendent Auditor's Report unless laws or regulations preclude public disclosure about such key audit matter or when, in extremely rare circumstances, we determine that a key audit matter should not be communicated in our Indpendent Auditor's Report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

KAP Purwanto Susanti dan Surja

Yovita

Registrasi Akuntan Publik No. AP.0242/*Public Accountant Registration No. AP.0242*

9 Maret 2026/*March 9, 2026*

00129

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PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION
As of December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	31 Desember 2025/ *December 31, 2025*	**Catatan/ *Notes***	**31 Desember 2024/ *December 31, 2024***	
ASET				***ASSETS***
Kas	46.336.157	2d,2i,4	71.600.262	*Cash*
Giro pada Bank Indonesia	1.238.091.018	2d,2j,5	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	317.275.973	2d,2j, 2g,6	114.518.280	*Current accounts with other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(5.945)		(44.983)	*Less: Allowance for impairment losses*
	317.270.028		114.473.297	
Penempatan pada Bank Indonesia dan bank lain	1.405.100.000	2d,2g, 2k,7	12.200.000	*Placements with Bank Indonesia and other banks*
Dikurangi: Cadangan kerugian penurunan nilai	(67.613)		(2.745)	*Less: Allowance for impairment losses*
	1.405.032.387		12.197.255	
Efek-efek	10.075.611.567	2d,2g, 2l,8	7.463.989.140	*Marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai	(1.153.091)		(1.266.198)	*Less: Allowance for impairment losses*
	10.074.458.476		7.462.722.942	
Efek-efek yang dibeli dengan janji dijual kembali	-	2d,2n,9	197.775.620	*Securities purchased under resale agreement*
Pendapatan bunga yang masih akan diterima	333.747.595	2d,2g,10	320.839.465	*Interest income receivables*
Dikurangi: Cadangan kerugian penurunan nilai	(8.633.381)		(6.087.977)	*Less: Allowance for impairment losses*
	325.114.214		314.751.488	
Pinjaman yang diberikan		2d,2g,		*Loans*
- Pihak berelasi	219.630.937	2m,11,42	123.467.111	*Related parties -*
- Pihak ketiga	22.160.535.279		20.436.393.210	*Third parties -*
	22.380.166.216		20.559.860.321	
Dikurangi: Cadangan kerugian penurunan nilai	(558.646.478)		(446.965.878)	*Less: Allowance for impairment losses*
	21.821.519.738		20.112.894.443	
Tagihan akseptasi	21.291.371	2o,12	17.791.739	*Acceptences receivable*
Penyertaan saham	-	2p,13	219.933.809	*Investments in shares*
Biaya dibayar dimuka	38.252.898	2t,14	31.143.626	*Prepaid expenses*
Aset tetap dan aset hak-guna	486.379.470	2q,15	471.188.772	*Fixed assets and right-of-use assets*
Dikurangi: Akumulasi penyusutan	(104.749.107)		(79.755.235)	*Less: Accumulated depreciation*
	381.630.363		391.433.537	
Agunan yang diambil alih	493.971.536	2g,2s,16	544.115.286	*Foreclosed assets*
Dikurangi: Cadangan kerugian penurunan nilai	(198.248.541)		(165.131.092)	*Less: Allowance for impairment losses*
	295.722.995		378.984.194	

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	31 Desember 2025/ ***December 31, 2025***	**Catatan/** ***Notes***	**31 Desember 2024/** ***December 31, 2024***	
ASET (lanjutan)				***ASSETS (continued)***
Aset tak berwujud - bersih	13.641.635	2r,17	11.099.418	*Intangible assets - net*
Aset pajak tangguhan - bersih	93.096.279	2ab,24c	137.020.678	*Deferred tax assets - net*
Aset lain-lain	140.733.207	2g,2t,18	182.450.157	*Other assets*
Dikurangi: Cadangan kerugian penurunan nilai	(10.493.682)		(11.336.194)	*Less: Allowance for impairment losses*
	130.239.525		171.113.963	
JUMLAH ASET	**36.201.697.084**		**31.045.989.252**	***TOTAL ASSETS***
LIABILITAS DAN EKUITAS				***LIABILITIES AND EQUITY***
LIABILITAS				***LIABILITIES***
Simpanan nasabah		2d,2u,19,		*Deposit from customers*
- Pihak berelasi	558.103.775	42	671.950.439	*Related parties* -
- Pihak ketiga	23.736.594.329		22.660.161.061	*Third parties* -
	24.294.698.104		23.332.111.500	
Simpanan dari bank lain		2d,2u,20,		*Deposits from other banks*
- Pihak berelasi	-	42	532.305	*Related parties* -
- Pihak ketiga	2.580.560.150		590.485.667	*Third parties* -
	2.580.560.150		591.017.972	
Efek-efek yang dijual dengan janji dibeli kembali	693.569.220	2d,2n,21	587.475.014	*Securities sold under repurchase agreement*
Efek-efek yang diterbitkan		2v,22,		*Securities issued*
- Pihak berelasi	538.660.000	42	147.885.000	*Related parties* -
- Pihak ketiga	3.421.340.000		2.162.115.000	*Third parties* -
	3.960.000.000		2.310.000.000	
Dikurangi: Biaya emisi yang belum diamortisasi	(37.618.861)		(20.587.351)	*Less: Unamortised issuance cost*
	3.922.381.139		2.289.412.649	
Liabilitas akseptasi	21.291.371	2o,23	17.005.026	*Acceptances payable*
Utang pajak	29.424.010	2ab,24a	26.451.979	*Taxes payable*
Liabilitas imbalan kerja karyawan	64.232.439	2ac,27b	54.003.307	*Employee benefits obligation*
Beban yang masih harus dibayar	127.214.976	2d,25	113.752.567	*Accrued expense*
Liabilitas lain-lain	99.404.455	2d,26	101.299.580	*Other liabilities*
JUMLAH LIABILITAS	**31.832.775.864**		**27.112.529.594**	***TOTAL LIABILITIES***

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	31 Desember 2025/ ***December 31, 2025***	**Catatan/** ***Notes***	**31 Desember 2024/** ***December 31, 2024***	
LIABILITAS DAN EKUITAS (lanjutan)				***LIABILITIES AND EQUITY (continued)***
EKUITAS				***EQUITY***
Modal saham - nilai nominal Rp100 (nilai penuh) per saham Modal dasar - 41.000.000.000 lembar saham pada 31 Desember 2025 dan 2024				*Share capital - par value Rp100 (full amount) per share Authorised capital - 41,000,000,000 shares as of December 31, 2025 and 2024*
Modal ditempatkan dan disetor penuh – 18.419.418.828 dan 15.848.532.906 saham masing-masing pada tanggal 31 Desember 2025 dan 2024	1.841.941.883	28	1.584.853.291	*Issued and fully paid capital – 18,419,418,828 and 15,848,532,906 shares as of December 31, 2025 and 2024, respectively*
Tambahan modal disetor	667.788.605	29	668.370.810	*Additional paid-in capital*
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	28.293.139	2d,2l	(25.504.113)	*Unrealised gain/(loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income, net of tax*
Surplus revaluasi aset tetap, setelah pajak	299.310.130		316.445.478	*Gain on revaluation of fixed assets, net of tax*
Pengukuran kembali atas liabilitas imbalan kerja, setelah pajak	4.471.007		11.058.011	*Remeasurements on employee benefit liabilities, net of tax*
Saldo laba:				*Retained earnings:*
- Telah ditentukan penggunaannya	252.200.000	31	227.200.000	*Appropriated* -
- Belum ditentukan penggunaannya	1.274.916.456		1.151.036.181	*Unappropriated* -
JUMLAH EKUITAS	**4.368.921.220**		**3.933.459.658**	***TOTAL EQUITY***
JUMLAH LIABILITAS DAN EKUITAS	**36.201.697.084**		**31.045.989.252**	***TOTAL LIABILITIES AND EQUITY***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN
Untuk Tahun yang berakhir pada tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME
For the Year Ended December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31*			
	2025	**Catatan/ *Notes***	**2024**	
PENDAPATAN DAN BEBAN OPERASIONAL				***OPERATING INCOME AND EXPENSES***
Pendapatan bunga	2.302.353.975	2y,32	2.076.267.755	*Interest income*
Beban bunga	(1.743.636.716)	2y,33	(1.527.667.207)	*Interest expense*
Pendapatan bunga - bersih	**558.717.259**		**548.600.548**	***Interest income - net***
Pendapatan operasional lainnya				***Other operating income***
Pendapatan dari investasi reksadana	37.760.750		21.747.990	*Income from investment in mutual funds*
Keuntungan atas penjualan efek-efek yang diukur pada nilai wajar melalui laba rugi dan penghasilan komprehensif lain - bersih	95.855.658	2d	32.464.070	*Gains on sale of securities measured at fair value through profit or loss and other comprehensive income - net*
Provisi dan komisi selain dari pinjaman	8.121.993	2z	7.888.853	*Fees and commissions from transactions other than loans*
Lain-lain - bersih	391.538.455	34	303.634.738	*Others - net*
Jumlah pendapatan operasional lainnya	**533.276.856**		**365.735.651**	***Total other operating income***
Beban operasional lainnya				***Other operating expenses***
Beban penyisihan kerugian penurunan nilai aset keuangan	(308.301.623)	2g,35	(202.042.492)	*Provision for impairment losses on financial assets*
(Beban)/pembalikan penyisihan kerugian penurunan nilai aset non-keuangan	(33.117.449)	2h,35	86.739.397	*(Provision)/reversal for impairment losses on non-financial assets*
Keuntungan/(kerugian) yang belum terealisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui laba rugi - bersih	3.428.335	2d	(7.500.945)	*Unrealised profit/(loss) Gain/(loss) on changes in fair value of securities measured at fair value through profit or loss - net*
Beban umum dan administrasi	(228.136.558)	2aa,36	(203.382.859)	*General and administrative expenses*
Beban tenaga kerja	(193.892.183)	2aa,37	(175.619.075)	*Personnel expenses*
Lain-lain	(110.006.121)	38	(119.560.177)	*Others*
Jumlah beban operasional lainnya	**(870.025.599)**		**(621.366.151)**	***Total other operating expenses***
LABA OPERASIONAL	**221.968.516**		**292.970.048**	***PROFIT FROM OPERATIONS***
Beban Non-Operasional - Bersih	(59.614.901)	39	(144.309.924)	*Non-Operating Expenses - Net*
LABA SEBELUM BEBAN PAJAK PENGHASILAN	**162.353.615**		**148.660.124**	***PROFIT BEFORE INCOME TAX EXPENSE***
BEBAN PAJAK PENGHASILAN - BERSIH	**(30.608.688)**	2ab,24b	**(30.800.886)**	***INCOME TAX EXPENSES - NET***
LABA BERSIH TAHUN BERJALAN	**131.744.927**		**117.859.238**	***NET PROFIT FOR THE YEAR***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun yang berakhir pada tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31*			
	2025	**Catatan/ *Notes***	**2024**	
PENGHASILAN KOMPREHENSIF LAIN				***OTHER COMPREHENSIVE INCOME***
Pos-pos yang akan direklasifikasi ke laba rugi				***Items that would be reclassified to profit or loss***
Perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	68.970.836	2d,2l	(11.117.726)	*Changes in fair value of marketable securities measured at fair value through other comprehensive income*
Pajak tangguhan terkait	(15.173.584)	24c	2.445.900	*Related deferred income tax*
	53.797.252		(8.671.826)	
Pos yang tidak akan direklasifikasi ke laba rugi				***Items that would never be reclassified to profit or loss***
Surplus revaluasi aset - bersih	(17.135.347)	2q	(66.010.674)	*Gain from revaluation asset - net*
Pengukuran kembali atas liabilitas imbalan kerja	(8.444.877)	27b	(10.780.629)	*Remeasurements on employee benefit liabilities*
Pajak tangguhan terkait	1.857.873	24c	2.371.738	*Related deferred income tax*
	(23.722.351)		(74.419.565)	
PENGHASILAN (RUGI) KOMPREHENSIF LAIN, SETELAH PAJAK PENGHASILAN	**30.074.901**		**(83.091.391)**	***OTHER COMPREHENSIVE INCOME (LOSS), NET OF INCOME TAX***
JUMLAH PENGHASILAN KOMPREHENSIF	**161.819.828**		**34.767.847**	***TOTAL COMPREHENSIVE INCOME***
LABA BERSIH PER SAHAM				***INCOME PER SHARE***
Dasar (Rupiah penuh)	7,15	2ad,40	7,44	*Basic (full Rupiah)*
Dilusian (Rupiah penuh)	7,15	2ad,40	7,44	*Diluted (full Rupiah)*

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN PERUBAHAN EKUITAS
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2025
(Disajikan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CHANGES IN EQUITY
For the Year Ended December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid capital*	Tambahan modal disetor/ *Additional paid-in capital*	Keuntungan (kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak/ *Unrealised gain (loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*	Surplus revaluasi aset tetap - setelah pajak/ *Gain on revaluation of fixed assets - net of tax*	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ *Remeasurements on employee benefit liabilities - net of tax*	Saldo laba/ *Retained earnings*		Jumlah/ *Total*	
							Telah ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya/ *Unappropriated*		
Saldo per 1 Januari 2025		**1.584.853.291**	**668.370.810**	**(25.504.113)**	**316.445.478**	**11.058.011**	**227.200.000**	**1.151.036.181**	**3.933.459.658**	***Balance as of January 1, 2025***
Dana setoran modal	28	257.088.592	-	-	-	-	-	-	257.088.592	*Capital deposit fund*
Biaya emisi efek	29	-	(582.205)	-	-	-	-	-	(582.205)	*Issuance cost*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak		-	-	53.797.252	-	-	-	-	53.797.252	*Financial assets measured at fair value through other comprehensive income, net of tax*
Reklasifikasi surplus atas revaluasi aset tetap		-	-	-	(17.135.348)	-	-	17.135.348	-	*Reclassification of surplus on revaluation of fixed assets*
Pengukuran Kembali atas liabilitas imbalan kerja		-	-	-	-	(6.587.004)	-	-	(6.587.004)	*Remeasurement on employee benefit liabilities, net of tax*
Pembentukan cadangan umum		-	-	-	-	-	25.000.000	(25.000.000)	-	*Establishment of general reserves*
Laba bersih tahun berjalan		-	-	-	-	-	-	131.744.927	131.744.927	*Net income for the year*
Saldo per 31 Desember 2025		**1.841.941.883**	**667.788.605**	**28.293.139**	**299.310.130**	**4.471.007**	**252.200.000**	**1.274.916.456**	**4.368.921.220**	***Balance as of December 31, 2025***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN PERUBAHAN EKUITAS (lanjutan)
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2025
(Disajikan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CHANGES IN EQUITY (continued)
For the Year Ended December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	Catatan/ *Notes*	Modal ditempatkan dan disetor penuh/ *Issued and fully paid capital*	Tambahan modal disetor/ *Additional paid-in capital*	Kerugian yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak/ *Unrealised loss on changes in fair value of marketable securities measured at fair value through other comprehensive income – net of tax*	Surplus revaluasi aset tetap - setelah pajak/ *Gain on revaluation of fixed assets - net of tax*	Pengukuran kembali atas liabilitas imbalan kerja - setelah pajak/ *Remeasurements on employee benefit liabilities - net of tax*	Saldo laba/ *Retained earnings*		Jumlah/ *Total*	
							Telah ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya/ *Unappropriated*		
Saldo per 1 Januari 2024		**1.584.823.578**	**668.684.728**	**(16.832.287)**	**382.456.152**	**19.466.902**	**202.200.000**	**983.985.937**	**3.824.785.010**	***Balance as of January 1, 2024***
Dana setoran modal	28	29.713	-	-	-	-	-	-	29.713	*Capital deposit fund*
Biaya emisi efek	29	-	(313.918)	-	-	-	-	-	(313.918)	*Issuance cost*
Penghasilan komprehensif lain:										*Other comprehensive income:*
Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak		-	-	(8.671.826)	-	-	-	-	(8.671.826)	*Financial assets measured at fair value through other comprehensive income, net of tax*
Surplus atas revaluasi aset tetap dan properti terbengkalai - bersih		-	-	-	8.180.332	-	-	-	8.180.332	*Gain on revaluation of fixed assets and abandoned properties – net*
Reklasifikasi surplus atas revaluasi aset tetap		-	-	-	(74.191.006)	-	-	74.191.006	-	*Reclassification of Surplus on revaluation of fixed assets*
Pengukuran Kembali atas liabilitas imbalan kerja		-	-	-	-	(8.408.891)	-	-	(8.408.891)	*Remeasurement on employee benefit liabilities, net of tax*
Pembentukan cadangan umum		-	-	-	-	-	25.000.000	(25.000.000)	-	*Establishment of general reserves*
Laba bersih tahun berjalan		-	-	-	-	-	-	117.859.238	117.859.238	*Net income for the year*
Saldo per 31 Desember 2024		**1.584.853.291**	**668.370.810**	**(25.504.113)**	**316.445.478**	**11.058.011**	**227.200.000**	**1.151.036.181**	**3.933.459.658**	***Balance as of December 31, 2024***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN ARUS KAS
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CASH FLOWS
For the Year Ended December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31*			
	2025	**Catatan/ *Notes***	**2024**	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan dari pendapatan bunga dan komisi	2.287.221.465		2.141.595.439	*Receipt from interest income and commissions*
Pembayaran bunga	(1.731.406.600)		(1.498.663.826)	*Payment of interest expenses*
Penerimaan dari pendapatan operasional lainnya	430.725.088		361.686.471	*Receipt from other operating income*
Penerimaan dari penjualan agunan yang diambil alih	58.013.195		206.825.700	*Receipt from sale of foreclosed assets*
Pembayaran beban umum dan administrasi	(195.014.741)		(175.914.872)	*Payment of general and administrative expenses*
Pembayaran beban tenaga kerja	(189.134.782)		(168.824.753)	*Payment of personnel expenses*
Pembayaran beban operasional lainnya	(147.331.539)		(166.668.398)	*Payments of other operating expenses*
	513.072.086		700.035.761	
(Kenaikan)/penurunan dalam aset operasi:				*(Increase)/decrease in operating assets:*
Pinjaman yang diberikan	(2.011.657.629)		(2.321.959.007)	*Loans*
Agunan yang diambil alih	(38.729.154)		-	*Foreclosed assets*
Beban dibayar dimuka	(7.109.272)		(5.678.602)	*Prepaid expenses*
Tagihan akseptasi	(3.499.632)		(5.316.900)	*Acceptances receivable*
Aset hak-guna	(1.687.257)		(2.619.166)	*Right-of-use assets*
Aset lain-lain	41.716.951		(81.275.966)	*Other assets*
Efek-efek yang dibeli dengan janji dijual kembali	200.000.000	9	438.956.934	*Securities purchased under resale agreements*
Kenaikan/(penurunan) dalam kewajiban operasi:				*Increase/(decrease) on operating liabilities:*
Simpanan dari bank lain	1.989.542.178		(513.785.388)	*Deposits from other banks*
Simpanan nasabah	962.586.604		902.931.008	*Deposits from customers*
Efek-efek yang dijual dengan janji dibeli kembali	106.094.206		(55.791.716)	*Securities sold under repurchase agreements*
Utang pajak lainnya	2.972.031	24a	(2.858.462)	*Other tax payables*
Liabilitas akseptasi	4.286.345		5.045.215	*Acceptances payable*
Arus kas bersih diperoleh dari /(digunakan untuk) aktivitas operasi	**1.757.587.457**		**(942.316.289)**	***Net cash flow provided /(used in) by operating activities***

PT BANK VICTORIA INTERNATIONAL Tbk
LAPORAN ARUS KAS (lanjutan)
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2025
(Dinyatakan dalam ribuan Rupiah, kecuali dinyatakan lain)

PT BANK VICTORIA INTERNATIONAL Tbk
STATEMENT OF CASH FLOWS (continued)
For the Year Ended December 31, 2025
(Expressed in thousands of Indonesian Rupiah, unless otherwise stated)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *Year Ended December 31*			
	2025	**Catatan/ *Notes***	**2024**	
ARUS KAS DARI AKTIVITAS INVESTASI				***NET CASH FLOWS FROM INVESTING ACTIVITIES***
Penerimaaan dari penyertaan saham	322.493.298	13	-	*Receive from investment in shares*
Hasil penjualan aset tetap	190.120	15	28.782.400	*Proceeds from sale of fixed assets*
Pembelian aset tetap	(16.229.169)	15	(19.802.096)	*Purchase of fixed assets*
Pembelian aset tak berwujud	(7.944.400)	17	(5.893.171)	*Purchase of intangible assets*
Pembelian efek-efek	(2.539.223.256)		(1.197.044.074)	*Purchase of marketable securities*
Arus kas bersih digunakan untuk aktivitas investasi	**(2.240.713.407)**		**(1.193.956.941)**	***Net cash used in* investing *activities***
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Penambahan modal disetor	257.088.592	28	29.713	*Additional paid-in capital*
Penerbitan obligasi	2.000.000.000	22	1.000.000.000	*Bonds issuance*
Pelunasan jatuh tempo obligasi	(350.000.000)	22	(50.000.000)	*Bonds repayment*
Pembayaran sewa	(15.948.812)		(12.635.205)	*Payment for lease*
Pembayaran emisi efek	(582.205)	29	(313.918)	*Payment for issuance cost*
Arus kas bersih diperoleh dari aktivitas pendanaan	**1.890.557.575**		**937.080.590**	***Net cash flow provided from financing activities***
KENAIKAN/(PENURUNAN) BERSIH KAS DAN SETARA KAS	**1.407.431.625**		**(1.199.192.640)**	***NET INCREASE/(DECREASE) OF CASH AND CASH EQUIVALENTS***
KAS DAN SETARA KAS PADA AWAL TAHUN	**1.599.371.523**		**2.798.564.163**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF THE YEAR***
KAS DAN SETARA KAS PADA AKHIR TAHUN	**3.006.803.148**		**1.599.371.523**	***CASH AND CASH EQUIVALENTS AT END OF THE YEAR***
Kas dan setara kas terdiri dari:				*Cash and cash equivalent consist of:*
Kas	46.336.157	4	71.600.262	*Cash*
Giro pada Bank Indonesia	1.238.091.018	5	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	317.275.973	6	114.518.280	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan Bank lain dibawah 3 bulan	1.405.100.000	7b	12.200.000	*Placements with Bank Indonesia and other Banks less than 3 months*
Jumlah kas dan setara kas	**3.006.803.148**		**1.599.371.523**	***Total cash and cash equivalents***

Catatan atas laporan keuangan terlampir merupakan bagian integral dari laporan keuangan ini.

The accompanying notes form an integral part of these financial statements.

1. INFORMASI UMUM

a. Pendirian dan informasi umum

PT Bank Victoria International Tbk ("Bank") didirikan pada tanggal 28 Oktober 1992 berdasarkan Akta Notaris A. Partomuan Pohan, S.H., LL.M., No. 71 yang selanjutnya diadakan pembetulan dengan Akta No. 30 tanggal 8 Juni 1993 dari Notaris yang sama. Akta pendirian tersebut disahkan oleh Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-4903.HT.01.01.TH 93 tanggal 19 Juni 1993 dan telah didaftarkan pada Kepaniteraan Pengadilan Negeri Jakarta Utara No. 342/Leg/1993 tanggal 29 Juni 1993 serta telah diumumkan dalam Berita Negara Republik Indonesia No. 39, Tambahan No. 2602 tanggal 15 Mei 1998. Anggaran Dasar Bank telah beberapa kali mengalami perubahan, perubahan terakhir Anggaran Dasar dengan Akta No. 26 tanggal 2 Juli 2024 yang dibuat dihadapan Fathiah Helmi, S.H., Notaris di Jakarta yang telah mendapatkan Penerimaan Pemberitahuan Perubahan Anggaran Dasar dari Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-AH.01.03.0167336 tanggal 2 Juli 2024 dan telah diterima dan dicatat dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia No. AHU-0131745.AH.01.11 Tahun 2024 tanggal 2 Juli 2024.

Sesuai dengan Pasal 3 anggaran dasar Bank, ruang lingkup kegiatan Bank adalah menjalankan usaha sebagai bank umum sesuai dengan ketentuan dan perundang-undangan yang berlaku. Bank mulai beroperasi secara komersial pada tanggal 5 Oktober 1994 sesuai dengan izin usaha yang diberikan oleh Menteri Keuangan Republik Indonesia dalam Surat Keputusan No. 402/KMK.017/1994 tanggal 10 Agustus 1994.

Bank telah mendapatkan izin menjadi bank devisa pada tanggal 13 Desember 2016 sesuai dengan Surat Kepala Departemen Perizinan dan Informasi Perbankan - Otoritas Jasa Keuangan No. S-423/PB.12/2016 dan efektif beroperasi menjadi bank devisa pada tanggal 20 Februari 2017. Bank memperoleh izin usaha sebagai pedagang valuta asing dari Bank Indonesia berdasarkan Surat No. 029/126/UOPM tanggal 25 Maret 1997.

1. GENERAL INFORMATION

a. Establishment and general information

PT Bank Victoria International Tbk ("the Bank") was established on October 28, 1992 based on Notarial Deed No. 71 of A. Partomuan Pohan, S.H., LL.M., subsequently amended by Deed No. 30 dated June 8, 1993 from the same notary. The deed of establishment was approved by the Ministry of Justice of the Republic of Indonesia in its Decision Letter No. C2-4903.HT.01.01.TH 93 dated June 19, 1993 and was registered at the State Court Secretary in North Jakarta No. 342/Leg/1993 dated June 29, 1993 also was published in Supplement No. 2602 to the State Gazette of the Republic of Indonesia No. 39 dated May 15, 1998. The Bank's articles of association has been amended several times, and the latest was based on Notarial Deed No. 26 dated July 2, 2024 of Fathiah Helmi, S.H., a notary in Jakarta which has been approved by Ministry of Law and Human Rights of the Republic of Indonesia No. AHU-AH.01.03.0167336 dated July 2, 2024 and has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-0131745.AH.01.11 dated July 2, 2024.

According to Article 3 of the Bank's articles of association, the scope of Bank's activities is to engage in commercial banking activities in accordance with the existing regulations. The Bank commenced its commercial operations on October 5, 1994 based on the operating license from the Ministry of Finance of the Republic of Indonesia in its Decision Letter No. 402/KMK.017/1994 dated August 10, 1994.

Bank was approved as a foreign exchange bank on December 13, 2016 in accordance with Head of Licensing and Banking Information Department Letter - Financial Services Authority ("OJK") No. S-423/PB.12/2016 and effectively commenced as a foreign exchange bank on February 20, 2017. The Bank obtained a license as money changer from Bank Indonesia based on Letter No. 029/126/UOPM dated March 25, 1997.

1. INFORMASI UMUM (lanjutan)

a. Pendirian dan informasi umum (lanjutan)

Kantor Pusat Bank berlokasi di Graha BIP Lantai 10, Jalan Gatot Subroto Kav. 23 Jakarta. Bank memiliki kantor pusat, dengan kantor cabang utama, kantor cabang pembantu, dan kantor kas sebagai berikut (tidak diaudit):

1. GENERAL INFORMATION (continued)

a. Establishment and general information (continued)

The Bank's Head Office is located at Graha BIP 10th Floor, Jalan Gatot Subroto Kav. 23 Jakarta. The Bank has operational head office and a number of branches, sub-branches, and cash offices as follows (unaudited):

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Kantor Pusat	1	1	*Head Office*
Kantor Cabang	14	14	*Branches*
Kantor Cabang Pembantu	21	24	*Sub-Branches*
Kantor Cabang Fungsional	1	-	*Functional Sub-Branches*

b. Penawaran umum saham dan penerbitan obligasi Bank

b. Public offering of the Bank's shares and issuance of bonds

Penawaran umum saham

Pada tanggal 4 September 1999, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal (Bapepam) melalui Surat No. S-835/PM/1999 untuk melakukan penawaran umum perdana kepada masyarakat sejumlah 250.000.000 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 80.000.000 Waran Seri I. Pada tanggal 30 September 1999, saham tersebut telah dicatatkan pada Bursa Efek Jakarta.

Pada tanggal 14 Agustus 2000, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No.S-2044/PM/2000 untuk melakukan Penawaran Umum Terbatas (PUT) I kepada para pemegang saham dalam rangka penerbitan Hak Memesan Efek Terlebih Dahulu sejumlah 614.000.000 saham dengan nilai nominal sebesar Rp100 (nilai penuh) dan harga penawaran sebesar Rp115 (nilai penuh) per saham dan sejumlah 85.960.000 Waran Seri II. Pada tanggal 28 September 2000, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT I ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 100.000.000 saham.

Pada tanggal 21 Februari 2003, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-36/PM/2003 untuk melakukan PUT II dengan Hak Memesan Efek Terlebih Dahulu sejumlah 705.243.360 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 423.146.016 Waran Seri III.

Public offering of shares

On September 4, 1999, the Bank obtained an effective notification from the Chairman of the Capital Market Supervisory Agency (Bapepam) through Letter No. S-835/PM/1999 to conduct an initial public offering of 250,000,000 shares with a par value and an offering price of Rp100 (full amount) per share and 80,000,000 Series I Warrants. On September 30, 1999, the Bank's shares have been listed in Jakarta Stock Exchange.

On August 14, 2000, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2044/PM/2000 to conduct Limited Public Offering (LPO) I to issue Preemptive Rights of 614,000,000 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 85,960,000 Series II Warrants. On September 28, 2000, these shares had been listed in Jakarta Stock Exchange. From LPO I, the shares that were undertaken by the entitled shareholders was 100,000,000 shares.

On February 21, 2003, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-36/PM/2003 to conduct LPO II to issue Pre-emptive Rights of 705,243,360 shares with a par value and an offering price of Rp100 (full amount) per share and 423,146,016 Series III Warrants.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Pada tanggal 20 Maret 2003, saham tersebut telah dicatatkan pada Bursa Efek Jakarta. Dari PUT II ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 400.000.000 saham.

Pada tanggal 12 September 2006, Bank memperoleh pernyataan efektif dari Ketua Badan Pengawas Pasar Modal dan Lembaga Keuangan (Bapepam dan LK) melalui Surat No. S-452/BL/2006 untuk melakukan PUT III sejumlah 670.363.760 saham dengan nilai nominal sebesar Rp100 (nilai penuh) dan harga penawaran sebesar Rp115 (nilai penuh) per saham dan sebanyak-banyaknya 469.277.676 Waran Seri IV. Pada tanggal 13 Juli 2006, saham tersebut telah dicatatkan pada Bursa Efek Indonesia. Dari PUT III ini, jumlah yang diambil oleh pemegang saham yang berhak sejumlah 670.363.760 saham.

Pada tanggal 26 Juni 2008, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-4114/BL/2008 untuk melakukan PUT IV sejumlah 1.167.498.560 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 630.449.220 Waran Seri V.

Pada tanggal 17 September 2011, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-6737/BL/2011 untuk melakukan PUT V sejumlah 1.954.919.259 saham dengan nilai nominal dan harga penawaran sebesar Rp100 (nilai penuh) per saham dan sejumlah 1.448.939.990 Waran Seri VI.

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2025:

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

On March 20, 2003, these shares had been listed in Jakarta Stock Exchange. From LPO II, the shares that were undertaken by the entitled shareholders was 400,000,000 shares.

On September 12, 2006, the Bank obtained an effective notification from the Chairman of Capital Market and Financial Institutions Supervisory Agency (Bapepam and LK) through Letter No. S-452/BL/2006 to conduct LPO III of 670,363,760 shares with a par value of Rp100 (full amount) and an offering price of Rp115 (full amount) per share and 469,277,676 Series IV Warrants. On July 13, 2006, these shares had been listed in Indonesia Stock Exchange. From LPO III, the shares that were undertaken by the entitled shareholders was 670,363,760 shares.

On June 26, 2008, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-4114/BL/2008 to conduct LPO IV of 1,167,498,560 shares with a par value and an offering price of Rp100 (full amount) per share and 630,449,220 Series V Warrants.

On September 17, 2011, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-6737/BL/2011 to conduct LPO V of 1,954,919,259 shares with a par value and an offering price of Rp100 (full amount) per share and 1,448,939,990 Series VI Warrants.

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2025 is as follows:

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Perdana pada tahun 1999	250.000.000	*Shares from Initial Public Offering in 1999*
Saham yang berasal dari pendiri	250.000.000	*Founder's shares*
Saham yang berasal dari kapitalisasi saldo laba	34.000.000	*Shares from capitalisation of retained earnings*

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada bursa efek di Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2025: (lanjutan)

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

The chronological overview of total issued and fully paid capital and shares listed at stock exchange in Indonesia from Initial Public Offering up to December 31, 2025 is as follows: (continued)

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Terbatas I dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2000	100.000.000	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) I in 2000*
Saham yang berasal dari Pelaksanaan Waran Seri I dan II pada tahun 2002	66.793.400	*Shares from Exercise of Series I and II Warrants in 2002*
Saham yang berasal dari Penawaran Umum Terbatas II dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2003	400.000.000	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) II in 2003*
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2004	193.799.960	*Shares from Exercise of Series III Warrants in 2004*
Saham yang berasal dari Pelaksanaan Waran Seri III pada tahun 2006	46.200.000	*Shares from Exercise of Series III Warrants in 2006*
Saham yang berasal dari Penawaran Umum Terbatas III dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2006	670.363.760	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) III in 2006*
Saham yang berasal dari Pelaksanaan Waran Seri IV pada tahun 2007	323.840.000	*Shares from Exercise of Series IV Warrants in 2007*
Saham yang berasal dari Penawaran Umum Terbatas IV dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2008	1.167.498.560	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) IV in 2008*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2009	344.244.500	*Shares from Exercise of Series IV and V Warrants in 2009*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2010	249.707.135	*Shares from Exercise of Series IV and V Warrants in 2010*
Saham yang berasal dari Penawaran Umum Terbatas V dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2011	1.954.919.259	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) V in 2011*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2011	414.580.000	*Shares from Issuance of Shares without Preemptive Rights in 2011*
Saham yang berasal dari Pelaksanaan Waran Seri IV dan V pada tahun 2011	81.724.314	*Shares from Exercise of Series IV and V Warrants in 2011*
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2012	56.673.554	*Shares from Exercise of Series V and VI Warrants in 2012*
Saham yang berasal dari Pelaksanaan Waran Seri V dan VI pada tahun 2013	25.923.831	*Shares from Exercise of Series V and VI Warrants in 2013*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2014	508.898.707	*Shares from Exercise of Series VI Warrants in 2014*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2015	300	*Shares from Exercise of Series VI Warrants in 2015*
Saham yang berasal dari Pelaksanaan Waran Seri VI pada tahun 2016	751.486.547	*Shares from Exercise of Series VI Warrants in 2016*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2016	780.394.335	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2016*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2019	280.898.877	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2019*
Saham yang berasal dari Penerbitan Saham Tanpa Hak Memesan Efek Terlebih Dahulu pada tahun 2021	1.535.185.529	*Shares from Exercise of Additional Shares Without Preemptive Rights in 2021*

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum saham (lanjutan)

Berikut adalah kronologis jumlah modal saham yang ditempatkan dan disetor penuh serta saham yang dicatatkan pada Bursa Efek Indonesia sejak Penawaran Umum Perdana sampai dengan tanggal 31 Desember 2025: (lanjutan)

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of shares (continued)

The chronological overview of total issued and fully paid capital and shares listed at Indonesia Stock Exchange from Initial Public Offering up to December 31, 2025 is as follows: (continued)

	Jumlah saham/ *Number of shares*	
Saham yang berasal dari Penawaran Umum Terbatas VI dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2022	2.553.461.919	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) VI in 2022*
Saham yang berasal dari Penawaran Umum Terbatas VII dengan Hak Memesan Efek Terlebih Dahulu pada tahun 2022	2.807.640.227	*Shares from Limited Public Offering with Preemptive Rights (Rights Issue) VII in 2022*
Saham yang berasal dari Pelaksanaan Waran Seri VII pada tahun 2023	1.064	*Shares from Exercise of Series VII Warrants in 2023*
Saham yang berasal dari Pelaksanaan Waran Seri VII pada tahun 2024	297.128	*Shares from Exercise of Series VII Warrants in 2024*
Saham yang berasal dari Pelaksanaan Waran Seri VII pada tahun 2025	2.570.885.922	*Shares from Exercise of Series VII Warrants in 2025*
Jumlah modal saham yang ditempatkan dan disetor penuh	18.419.418.828 *)	*Total issued and fully paid capital*

*) Jumlah modal saham yang ditempatkan dan disetor penuh termasuk 1% saham yang tidak diperdagangkan pada PT Bursa Efek Indonesia (*delisted*) sesuai ketentuan Peraturan Pemerintah RI No. 29 tahun 1999.

**) Number of shares issued and fully paid includes 1% of delisted shares in the Indonesia Stock Exchange accordance with Government Regulation No. 29 Year 1999.*

Penawaran umum obligasi

Pada tanggal 28 Desember 1999, Bank memperoleh pernyataan efektif dari Ketua Bapepam melalui Surat No. S-2683/PM/1999 untuk melakukan penawaran umum Obligasi Bank Victoria I Tahun 2000 sejumlah Rp100.000.000. Pada tanggal 14 Maret 2000, Obligasi tersebut telah dicatatkan pada Bursa Efek Surabaya.

Pada tanggal 9 Maret 2007, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-1080/BL/2007 untuk melakukan penawaran umum Obligasi Bank Victoria II Tahun 2007 dan Obligasi Subordinasi Bank Victoria I Tahun 2007 masing-masing sejumlah Rp200.000.000. Pada tanggal 22 Maret 2007, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Public offering of bonds

On December 28, 1999, the Bank obtained an effective notification from the Chairman of Bapepam through Letter No. S-2683/PM/1999 for the public offering of Bank Victoria Bonds I Year 2000 amounting to Rp100,000,000. On March 14, 2000, the Bonds had been listed in Surabaya Stock Exchange.

On March 9, 2007, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-1080/BL/2007 for the public offering of Bank Victoria Bonds II Year 2007 and Bank Victoria Subordinated Bonds I Year 2007, each amounting to Rp200,000,000. On March 22, 2007, the Bonds had been listed in Indonesia Stock Exchange.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum obligasi (lanjutan)

Pada tanggal 19 September 2012, Bank memperoleh pernyataan efektif dari Ketua Bapepam dan LK melalui Surat No. S-7574/BL/2012 untuk melakukan penawaran umum Obligasi Bank Victoria III Tahun 2012 dan Obligasi Subordinasi Bank Victoria II Tahun 2012 masing-masing sejumlah Rp200.000.000 dan Rp300.000.000. Pada tanggal 28 September 2012, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 21 September 2017, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-340/D.04/2017 untuk melakukan penawaran umum Obligasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap I Tahun 2017 masing-masing sejumlah Rp300.000.000 dan Rp50.000.000. Pada tanggal 12 Juli 2017, Obligasi-obligasi tersebut telah dicatatkan pada Bursa Efek Indonesia.

Pada tanggal 5 September 2018, Bank melakukan Penawaran Umum Obligasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018 dan Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018. Obligasi Berkelanjutan yang ditawarkan terdiri dari 2 (dua) seri Obligasi, yaitu Seri A sejumlah Rp100.000.000 dan Seri B sejumlah Rp200.000.000, sedangkan Obligasi Subordinasi sebesar Rp350.000.000.

Pada tanggal 24 September 2019, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-85/D.04/2019 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta telah dicatatkan pada Bursa Efek Indonesia 1 Juli 2019 masing-masing sejumlah Rp100.000.000 dan Rp250.000.000.

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of bonds (continued)

On September 19, 2012, the Bank obtained an effective notification from the Chairman of Bapepam and LK through Letter No. S-7574/BL/2012 for the public offering of Bank Victoria Bonds III Year 2012 and Bank Victoria Subordinated Bonds II Year 2012, amounting to Rp200,000,000 and Rp300,000,000, respectively. On September 28, 2012, the Bonds had been listed in Indonesia Stock Exchange.

On September 21, 2017, the Bank obtained the notice of effectivity from Financial Services Authority Board of Commissioner through Letter No. S-340/D.04/2017 for the public offering of Continuing Bonds I Bank Victoria Phase I year 2017 and Subordinated Bonds I Bank Victoria Phase I Year 2017 in amount of Rp300,000,000 and Rp50,000,000, respectively. On July 12, 2017, these bonds were listed on the Indonesia Stock Exchange.

On September 5, 2018, Bank continues the Public Offering of Bank Victoria Continuing Bonds I Phase II Year 2018 and Bank Victoria Subordinated Bonds I Phase II Year 2018. The Continuing Bonds offered comprise of 2 (two) series, Series A amounted to Rp100,000,000 and Series B amounted to Rp200,000,000, while the Subordinated Bonds offered amounted to Rp350,000,000.

On September 24, 2019, Bank obtained an effective notification from the Chairman of FSA through Letter No. S-85/D.04/2019 for continuous offering of Continuing Bonds II Phase I Year 2019 and Bank Victoria Subordinated Bonds II Phase I Year 2019, which has been listed on the Indonesia Stock Exchange on July 1, 2019, amounting to Rp100,000,000 and Rp250,000,000, respectively.

On November 8, 2019, the Bank issued Bank Victoria Continuing Subordinated Bonds II Phase II Year 2019 amounting to Rp150,000,000.

1. INFORMASI UMUM (lanjutan)

b. Penawaran umum saham dan penerbitan obligasi Bank (lanjutan)

Penawaran umum obligasi (lanjutan)

Pada tanggal 1 April 2020, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 sebesar Rp60.000.000.

Pada tanggal 28 Februari 2023, Bank memperoleh pernyataan efektif dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-64/D.04/2023 untuk melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A dan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B serta telah dicatatkan pada Bursa Efek Indonesia pada tanggal 10 Maret 2023 masing-masing sejumlah Rp300.000.000 dan Rp200.000.000.

Pada tanggal 28 Juni 2024, Bank memperoleh pemberitahuan efektifnya pernyataan pendaftaran dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-87/D.04/2024 dalam rangka melakukan Penawaran Umum Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 serta telah dicatatkan pada Bursa Efek Indonesia pada tanggal 12 Juli 2024 sejumlah Rp500.000.000.

Pada tanggal 12 Juli 2024, Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 sebesar Rp500.000.000 (Catatan 22).

Pada tanggal 18 Juni 2025, Bank menerbitkan Obligasi Subordinasi Berkelanjutan III Tahap II Tahun 2025 sebesar Rp500.000.000 (Catatan 22).

Pada tanggal 26 Juni 2025, Bank memperoleh pemberitahuan efektifnya pernyataan pendaftaran dari Dewan Komisioner Otoritas Jasa Keuangan ("OJK") melalui Surat No. S-55/D.04/2025 dalam rangka melakukan Penawaran Umum Berkelanjutan Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 serta telah dicatatkan pada Bursa Efek Indonesia pada tanggal 04 Juli 2025 sejumlah Rp750.000.000.

Pada tanggal 26 September 2025, Bank menerbitkan Obligasi Berkelanjutan IV Tahap II Tahun 2025 sebesar Rp750.000.000 (Catatan 22).

1. GENERAL INFORMATION (continued)

b. Public offering of the Bank's shares and issuance of bonds (continued)

Public offering of bonds (continued)

On April 1, 2020, the Bank issued Bank Victoria Continuing Subordinated Bonds II Phase III Year 2020 amounting to Rp60,000,000.

On February 28, 2023, the Bank received an effective statement from the Financial Services Authority's ("OJK") Board of Commissioners through Letter No. S-64/D.04/2023 to conduct a Continuing Public Offering of Bank Victoria Continuing Bonds III Phase I Year 2023 Series A and Bank Victoria Continuing Bonds III Phase I Year 2023 Series B, which were listed on the Indonesian Stock Exchange on March 10, 2023, each amounting to Rp300,000,000 and Rp200,000,000 respectively.

On June 28, 2024, the Bank received an effective statement from the Financial Services Authority's ("OJK") Board of Commissioners through Letter No. S-87/D.04/2024 for the public offering of Bank Victoria Continuing Subordinated Bonds III Phase I Year 2024, which were listed on the Indonesian Stock Exchange on July 12, 2024, amounting to Rp500,000,000.

On July 12, 2024, the Bank issued Bank Victoria Continuing Bonds III Phase II Year 2024 amounting to Rp500,000,000 (Note 22).

On June 18, 2025, the Bank issued Bank Victoria Subordinated Continuing Bonds III Phase II Year 2025 amounting to Rp500,000,000 (Note 22).

On June 26, 2025, the Bank received an effective statement from the Financial Services Authority's ("OJK") Board of Commissioners through Letter No. S-55/D.04/2025 for the public offering of Bank Victoria Continuing Bonds IV Phase I Year 2025, which were listed on the Indonesian Stock Exchange on July 04, 2025, amounting to Rp750,000,000.

On September 26, 2025, the Bank issued Bank Victoria Continuing Bonds IV Phase II Year 2025 amounting to Rp750,000,000 (Note 22).

1. INFORMASI UMUM (lanjutan)

c. Entitas anak dan asosiasi

Entitas anak

Bank merupakan pemegang saham pengendali dan memiliki pengaruh signifikan atas Entitas anak sebagai berikut:

1. GENERAL INFORMATION (continued)

c. Subsidiaries and associate entity

Subsidiaries

The Bank is the controlling stockholder and has a significant control over the Subsidiaries as follows:

Entitas Anak/ *Subsidiary*	Jenis usaha/ *Nature of business*	Persentase kepemilikan/ *Percentage of ownership*	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2025	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2024
Reksadana / *Mutual Funds*:				
Batavia Proteksi Andalan 7	Reksadana Terproteksi	100%	155.119.938	162.787.521
Mega Dana Terproteksi VIII	Reksadana Terproteksi	100%	42.495.964	42.499.762

Entitas asosiasi

Associate entity

Entitas Asosiasi/ *Associate Entity*	Jenis usaha/ *Nature of business*	Persentase kepemilikan/ *Percentage of ownership*	Tahun operasi komersial/ *Start of commercial operations*	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2025	Jumlah aset/ *Total Assets* 31 Desember/ *December 31,* 2024
PT Bank Victoria Syariah	Sharia banking	19,81%	1966	-	3.314.468.601

Berdasarkan Akta Notaris Veronika Lily Dharma, S.H. No. 15 tanggal 7 September 2007, Notaris di Jakarta, Bank mengakuisisi 99,80% saham PT Bank Swaguna ("Entitas Anak"). Pada tanggal 13 Desember 2007, Bank melakukan penambahan modal di Entitas Anak sehingga kepemilikan Bank menjadi 99,98% sesuai dengan Akta Notaris Veronika Lily Dharma, S.H. No. 26 tanggal 13 Desember 2007.

Pada tanggal 30 Maret 2017 dan 18 Desember 2017, setelah mendapatkan persetujuan OJK berdasarkan Surat No. S-33/PB.33/2017 tanggal 30 Maret 2017 dan No. S-170/PB.33/2017 tanggal 18 Desember 2017, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp60.000.000.000 dan Rp40.000.000.000 (nilai penuh) sehingga kepemilikan Bank menjadi 99,99%.

Based on Notarial Deed No. 15 dated September 7, 2007 of Veronika Lily Dharma, S.H., a Notary in Jakarta, the Bank acquired 99.80% shareholding of PT Bank Swaguna ("Subsidiary"). On December 13, 2007, the Bank had an additional capital in the Subsidiary which increased the Bank's ownership to 99.98% based on Notarial Deed No. 26 of Veronika Lily Dharma, S.H. dated December 13, 2007.

On March 30, 2017 and December 18, 2017, after obtaining approval from OJK based on Letter No. S-33/PB.33/2017 dated March 30, 2017 and No. S-170/PB.33/2017 dated December 18, 2017, the Bank put additional capital of Rp60,000,000,000 and Rp40,000,000,000 (full amount) into Subsidiary, which increase the Bank's ownership to 99.99%.

1. INFORMASI UMUM (lanjutan)

c. Entitas anak dan asosiasi (lanjutan)

Pada tanggal 24 Oktober 2019, Bank melakukan penambahan modal pada Entitas Anak sebesar Rp50.000.000.000 (nilai penuh) sehingga kepemilikan Bank menjadi 99,99% dan telah mendapatkan persetujuan OJK berdasarkan Surat No. S-53/PB.33/2019 tanggal 22 Oktober 2019.

Entitas Anak telah mengalami perubahan nama menjadi PT Bank Victoria Syariah sesuai dengan Akta No. 5 tanggal 6 Agustus 2009 dan Akta No. 24 tanggal 27 November 2009 dari Notaris Erni Rohaini, S.H., M.B.A., Notaris di Jakarta. Akta tersebut telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dalam Surat Keputusan No. AHU-02731.AH.01.02 tahun 2010 tanggal 19 Januari 2010. Perubahan kegiatan usaha bank umum konvensional menjadi bank umum syariah telah mendapatkan izin dari Bank Indonesia berdasarkan Keputusan Gubernur Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 tertanggal 10 Februari 2010. Selanjutnya, Entitas Anak beroperasi dengan prinsip Syariah mulai tanggal 1 April 2010.

Pada tanggal 22 Desember 2022, Bank melakukan divestasi 80% kepemilikan di entitas anak, PT Bank Victoria Syariah, oleh karena itu sejak 23 Desember 2022, Bank tidak lagi mengendalikan PT Bank Victoria Syariah.

Pada tanggal 05 Juni 2025, Bank melakukan transaksi penjualan atas saham yang dimiliki pada PT Bank Victoria Syariah kepada PT Bank Tabungan Negara (“Persero”) Tbk, sesuai dengan akta Jual Beli Pengambilalihan Saham dalam PT Bank Victoria Syariah No. 13 tertanggal 05 Juni 2025 dibuat dihadapan Ashoya Ratam S.H., M.Kn, Notaris di Jakarta.

1. GENERAL INFORMATION (continued)

c. Subsidiaries and associate entity (continued)

On October 24, 2019, the Bank put additional capital of Rp50,000,000,000 (full amount) into Subsidiary, which increase the Bank’s ownership to 99.99% and obtained the approval from OJK based on Letter No. S-53/PB.33/2019 dated October 22, 2019.

The Subsidiary changed its name to PT Bank Victoria Syariah based on Deed No. 5 dated August 6, 2009 and No. 24 dated November 27, 2009 of Erni Rohaini, S.H., M.B.A., a Notary in Jakarta. The notarial deed was approved by the Ministry of Law and Human Rights of the Republic of Indonesia in its Decision Letter No. AHU-02731.AH.01.02 Year 2010 dated January 19, 2010. The changes of subsidiary’s business from conventional banking to sharia banking was approved by Bank Indonesia based on the Decision of the Governor of Bank Indonesia No. 12/8/KEP.GBI/DPG/2010 dated February 10, 2010. The Subsidiary started its operations as a Sharia Bank on April 1, 2010.

On December 22, 2022, Bank divested 80% ownership in subsidiary, PT Bank Victoria Syariah, therefore since December 23, 2022, Bank is no longer controlled PT Bank Victoria Syariah.

On June 05, 2025, the Bank conducted a sale transaction of shares owned in PT Bank Victoria Syariah to PT Bank Tabungan Negara (“Persero”) Tbk, in accordance with the deed of Sale and Purchase of Acquisition of Shares in PT Bank Victoria Syariah No. 13 dated June 05, 2025 of Ashoya Ratam S.H., M.Kn, Notary in Jakarta.

1. INFORMASI UMUM (lanjutan) / *1. GENERAL INFORMATION (continued)*

d. Dewan Komisaris dan Direksi, Komite dan Karyawan / *d. Boards of Commissioners and Directors, Committee and Employees*

Susunan Dewan Komisaris dan Direksi Bank pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The composition of the Bank's Boards of Commissioners and Directors as of December 31, 2025 and 2024 are as follows:

	31 Desember/ *December 31,* 2025	**31 Desember/ *December 31,* 2024**	
Dewan Komisaris			***Board of Commissioners***
Komisaris Utama	Zaenal	Zaenal	*President*
Independen	Abidin Ph.D.	Abidin Ph.D.	*Commissioner*
Komisaris	Gunawan	Gunawan	*Independent*
Independen	Tenggarahardja	Tenggarahardja	*Commisioner*
Komisaris	Sia Leng Ho	Sia Leng Ho	*Commissioner*
Direksi			***Board of Directors***
Direktur Utama	Achmad Friscantono MBA	Achmad Friscantono MBA	*President Director*
Wakil Direktur Utama	Rusli	Rusli	*Vice President Director*
Direktur Keuangan	Debora Wahjutirto Tanoyo	Debora Wahjutirto Tanoyo	*Finance Director*
Direktur	Lembing	Lembing	*Director*
Direktur Kepatuhan dan Manajemen Risiko	Tamunan	Tamunan	*Risk Management and Compliance Director*

Susunan Dewan Komisaris dan Direksi pada tanggal 31 Desember 2025 dan 2024 tersebut di atas telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.09-0306553 tanggal 4 Juli 2025.

The composition of the Boards of Commissioners and Directors as of December 31, 2025 and 2024 had been accepted and recorded in the database of Legal Entities Administration System of the Ministry of Laws and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.09-0306553 dated July 4, 2025.

Susunan Komite Audit pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The composition of the Audit Committee as of December 31, 2025 and 2024 are as follows:

	31 Desember/ *December 31,* 2025	**31 Desember/ *December 31,* 2024**	
Ketua	Zaenal Abidin Ph.D.	Zaenal Abidin Ph.D.	*Chairman*
Anggota	Medi Sejati	Yozef Abdulrachman*)	*Member*
Anggota	Taufiq Akbar**)	Medi Sejati	*Member*

*) Yozef Abdulrachman telah mengakhiri masa jabatannya sebagai Anggota Komite Audit efektif pada tanggal 1 Agustus 2025.
**) Taufiq Akbar ditunjuk sebagai Anggota Komite Audit efektif pada tanggal 1 Agustus 2025

*) *Yozef Abdulrachman completed his term of office as a Member of Audit Committee effective on August 1, 2025.*
**) *Taufiq Akbar is appointed as a Member of Audit Committee effectively on August 1, 2025*

1. INFORMASI UMUM (lanjutan) / *1. GENERAL INFORMATION (continued)*

d. Dewan Komisaris dan Direksi, Komite dan Karyawan (lanjutan) / *d. Boards of Commissioners and Directors, Committee and Employees (continued)*

Pembentukan Komite Audit Bank telah sesuai dengan Peraturan Otoritas Jasa Keuangan No. 55/POJK.04/2015 tanggal 23 Desember 2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit dan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tanggal 14 September 2023 tentang Penerapan Tata Kelola Bagi Bank Umum.

Establishment of the Bank's Audit Committee is in compliance with Financial Service Authority regulation No. 55/POJK.04/2015 dated December 23, 2015 regarding Establishment and Guideline for Implementation Duty of Audit Committee and Financial Service Authority regulation No. 17 Year 2023 dated September 14, 2023 regarding the Implementation of Governance for Commercial Banks.

Susunan Komite Pemantau Risiko pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The composition of the Risk Monitoring Committee as of December 31, 2025 and 2024 are as follows:

	31 Desember/ *December 31,* 2025	31 Desember/ *December 31,* 2024	
Ketua	Zaenal Abidin Ph.D.*)	Gunawan Tenggarahardja	*Chairman*
Anggota	Gunawan Tenggarahardja	Zaenal Abidin Ph.D.	*Member*
Anggota	Medi Sejati	Yozef Abdulrachman***)	*Member*
Anggota	Taufiq Akbar**)	Medi Sejati	*Member*

Susunan Komite Nominasi dan Remunerasi pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The composition of the Nomination and Remuneration Committee as of December 31, 2025 and 2024 are as follows:

	31 Desember/ *December 31,* 2025	31 Desember/ *December 31,* 2024	
Ketua	Gunawan Tenggarahardja	Gunawan Tenggarahardja	*Chairman*
Anggota	Sia Leng Ho	Sia Leng Ho	*Member*
Anggota	Syahda Candra	Syahda Candra	*Member*

Sekretaris Perusahaan dan Kepala Internal Audit pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The Corporate Secretary and Internal Audit Head as of December 31, 2025 and 2024 are as follows:

	31 Desember/ *December 31,* 2025	31 Desember/ *December 31,* 2024	
Sekretaris Perusahaan	Caprie Ardira Azhar	Caprie Ardira Azhar	*Corporate Secretary*
Kepala Internal Audit	Djoko Soenjojo	Djoko Soenjojo	*Internal Audit Head*

Pada tanggal 31 Desember 2025 dan 2024, Bank memiliki karyawan masing-masing sejumlah 723 dan 746 karyawan (tidak diaudit).

As of December 31, 2025 and 2024 the Bank had 723 and 746 employees, respectively (unaudited).

*) Zaenal Abidin Ph.D. ditunjuk sebagai Ketua Komite Pemantau Risiko efektif pada tanggal 1 Agustus 2025
**) Taufiq Akbar ditunjuk sebagai Anggota Komite Pemantau Risiko efektif pada tanggal 1 Agustus 2025
***) Yozef Abdulrachman telah mengakhiri masa jabatannya sebagai Anggota Komite Pemantau Risiko efektif pada tanggal 1 Agustus 2025.

*) *Zaenal Abidin Ph.D. is appointed as a Chairman of Risk Monitoring Committee effectively on August 1, 2025*
**) *Taufiq Akbar is appointed as a Member of Risk Monitoring Committee effectively on August 1, 2025*
***) *Yozef Abdulrachman completed his term of office as a Member of Risk Monitoring Committee effective on August 1, 2025.*

1. INFORMASI UMUM (lanjutan)

e. Pemegang saham akhir

Pemegang saham pengendali langsung dan pemegang saham akhir Bank pada tanggal 31 Desember 2025 dan 2024 adalah masing-masing PT Victoria Investama Tbk dan Suzanna Tanojo.

1. GENERAL INFORMATION (continued)

e. Ultimate shareholders

The direct controlling shareholder and ultimate shareholder of the Bank as of December 31, 2025 and 2024 are PT Victoria Investama Tbk and Suzanna Tanojo, respectively.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL

Manajemen Bank bertanggungjawab atas penyusunan dan penyajian wajar laporan keuangan ini sesuai dengan Standar Akuntansi Keuangan di Indonesia, yang diselesaikan dan diotorisasi untuk diterbitkan oleh Direksi Bank pada tanggal 9 Maret 2026.

Kebijakan akuntansi utama yang diterapkan dalam penyusunan laporan keuangan adalah seperti dijabarkan di bawah ini:

a. Dasar penyajian laporan keuangan

Laporan keuangan telah disusun dan disajikan sesuai dengan dengan Standar Akuntansi Keuangan di Indonesia yang mencakup Pernyataan dan Interpretasi yang diterbitkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia dan Dewan Standar Akuntansi Ikatan Akuntan Indonesia serta Peraturan No. VIII.G.7 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

Laporan keuangan disusun berdasarkan harga perolehan kecuali untuk aset keuangan yang diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") dan aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi ("FVTPL"). Laporan keuangan disusun berdasarkan akuntansi berbasis akrual, kecuali untuk laporan arus kas.

Seluruh angka dalam laporan keuangan ini, kecuali dinyatakan secara khusus, dibulatkan menjadi dan disajikan dalam ribuan Rupiah yang terdekat.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION

The Bank's management is responsible for the preparation and fair presentation of these financial statements, which were completed and authorised for issuance by the Board of Directors of the Bank on March 9, 2026.

The principal accounting policies adopted in preparing the financial statements of the Bank are set out below:

a. Basis of preparation of the financial statements

The financial statements were prepared and presented in accordance with Indonesian Financial Accounting Standards issued by the Board of Financial Accounting Standards of Indonesian Institute of Accountants and the Board of Accounting Standards of the Indonesian Institute of Accountants and the Regulation of No. VIII.G.7 regarding "Guidliness on Financial Statements Presentation and disclosure for Issuers or Public Companies".

The financial statements have been prepared under the historical cost convention, except for financial assets measure as fair value through other comprehensive income ("FVOCI") and financial assets held at fair value through profit or loss ("FVTPL"). The financial statements are prepared under the accrual basis of accounting, except for the statement of cash flows.

All figures in the financial statements are rounded to and stated in thousands of Rupiah, unless otherwise stated.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

a. Dasar penyajian laporan keuangan (lanjutan)

Laporan arus kas disusun dengan menggunakan metode langsung dengan mengelompokkan arus kas dalam aktivitas operasi, investasi, dan pendanaan. Untuk tujuan laporan arus kas, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

Penyusunan laporan keuangan sesuai dengan Standar Akuntansi Keuangan di Indonesia mengharuskan penggunaan estimasi dan asumsi. Hal tersebut juga mengharuskan manajemen untuk membuat pertimbangan dalam proses penerapan kebijakan akuntansi Bank. Area yang kompleks atau memerlukan tingkat pertimbangan yang lebih tinggi atau area di mana asumsi dan estimasi dapat berdampak signifikan terhadap laporan keuangan diungkapkan di Catatan 3.

b. Perubahan kebijakan akuntansi yang signifikan

Bank menerapkan pertama kali seluruh standar baru dan/atau yang direvisi yang berlaku efektif untuk periode yang dimulai pada atau setelah 1 Januari 2025, termasuk standar yang direvisi berikut ini yang mempengaruhi laporan keuangan:

Amandemen PSAK 221: Kekurangan Ketertukaran

Amandemen tersebut mengharuskan pengungkapan informasi yang memungkinkan pengguna laporan keuangan memahami dampak mata uang yang tidak dapat dipertukarkan dengan mata uang lain yang memengaruhi, atau diperkirakan akan memengaruhi, kinerja keuangan, posisi keuangan, dan arus kas entitas. Amandemen berlaku untuk periode pelaporan tahunan yang dimulai pada atau setelah 1 Januari 2025. Penerapan dini diperkenankan dimana entitas diharuskan mengungkapkan fakta tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

a. Basis of preparation of the financial statements (continued)

The statement of cash flows were prepared based on the direct method with cash flows classified into cash flows from operating, investing, and financing activities. For the purpose of the statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

The preparation of financial statements in accordance with Indonesian Financial Accounting Standards requires the use of estimates and assumptions. It also requires management to make judgments in the process of implementing the Bank's accounting policies. The area that is complex or requires a higher level of consideration or areas where assumptions and estimates could have a significant impact on the financial statements are disclosed in Note 3.

b. Change in significant accounting policies

The Bank made first time adoption of all the new and/or revised standards effective for the periods beginning on or after January 1, 2025, including the following revised standards that have affected the financial statement:

Amendment of SFAS 221: Lack of Exchangeability

The amendments require disclosure of information that enables user of financial statements to understand the impact of a currency not being exchangeable into the other currency affects, or is expected to affect, the entity's financial performance, financial position and cash flows. The amendments apply for annual reporting periods beginning on or after 1 January 2025. Earlier application is permitted which an entity is required to disclose that fact.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

c. Prinsip konsolidasi

Laporan keuangan konsolidasian meliputi laporan keuangan Bank beserta seluruh Entitas Anak yang berada di bawah pengendalian Bank. Entitas Anak adalah entitas (termasuk entitas terstruktur) dimana Bank memiliki pengendalian. Bank mengendalikan entitas lain ketika Bank terekspos atas, atau memiliki hak atas imbal hasil variabel dari keterlibatannya dengan Entitas Anak dan memiliki kemampuan untuk mempengaruhi imbal hasil tersebut melalui kekuasaannya atas Entitas Anak.

Laporan keuangan dari Entitas Anak dimasukkan ke dalam laporan keuangan konsolidasian sejak tanggal pengendalian dimulai sampai dengan tanggal pengendalian berakhir.

Dampak signifikan dari seluruh transaksi dan saldo antara perusahaan-perusahaan yang dikonsolidasikan telah dieliminasi dalam penyajian laporan keuangan konsolidasian, sehingga laporan keuangan konsolidasian hanya mencakup transaksi dan saldo dengan pihak lain.

Kebijakan akuntansi penting yang dipakai dalam penyajian laporan keuangan konsolidasian telah diterapkan secara konsisten oleh Bank, kecuali dinyatakan secara khusus.

Kepentingan nonpengendali disajikan di ekuitas dalam laporan posisi keuangan konsolidasian dan dinyatakan sebesar proporsi pemegang saham non-pengendali atas laba tahun berjalan dan ekuitas Entitas Anak tersebut berdasarkan persentase kepemilikan pemegang saham nonpengendali pada Entitas Anak tersebut.

Dalam hal pengendalian terhadap Entitas Anak dimulai atau diakhiri dalam suatu tahun, 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.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

c. Basis of consolidation

The consolidated financial statements include the financial statements of the Bank and its Subsidiaries that are controlled by the Bank. Subsidiaries are all entities (including structured entities) over which the Bank has control. The Bank controls an entity when the Bank is exposed to, or has rights to, variable returns from its involvement with the Subsidiary and has the ability to affect those returns through its power over the Subsidiary.

The financial statements of Subsidiary are included in the consolidated financial statements from the date on which control commences until the date when control ceases.

The significant effects of all transactions and balances between the consolidated companies have been eliminated in preparing the consolidated financial statements, accordingly, the consolidated financial statements include only transactions and balances with other parties.

The significant accounting policies adopted in preparing the consolidated financial statements have been consistently applied by the Bank, unless otherwise stated.

Non-controlling interest is presented as part of equity in the consolidated statements of financial position and represents the non-controlling shareholder's proportionate share in the net income for the year and equity of the Subsidiary based on the percentage of ownership of the non-controlling shareholders in the Subsidiary.

Where Subsidiary either began or ceased to be controlled during the year, the results of operations of those Subsidiaries are included in the consolidated financial statements only from the date that the control has commenced or up to the date that the control has ceased.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan

(i) Aset keuangan

Sesuai dengan PSAK 109, terdapat tiga klasifikasi pengukuran aset keuangan:

(A) Biaya perolehan diamortisasi;
(B) Diukur pada nilai wajar melalui laba rugi ("FVTPL"); dan
(C) Diukur pada nilai wajar melalui penghasilan komprehensif lain ("FVOCI").

Aset keuangan diklasifikasikan menjadi kategori tersebut di atas berdasarkan model bisnis dimana aset keuangan tersebut dimiliki dan karakteristik arus kas kontraktualnya. Model bisnis merefleksikan bagaimana kelompok aset keuangan dikelola untuk mencapai tujuan bisnis tertentu.

Aset keuangan dapat diukur dengan biaya perolehan diamortisasi hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan untuk tujuan mendapatkan arus kas kontraktual (*held to collect*); dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata ("SPPI") dari jumlah pokok terutang.

Suatu aset keuangan diukur pada FVOCI, hanya jika memenuhi kedua kondisi berikut dan tidak ditetapkan sebagai FVTPL:

- Aset keuangan dikelola dalam model bisnis yang tujuan tercapai dengan mendapatkan arus kas kontraktual dan menjual aset keuangan *(held to collect and sell)*; dan
- Kriteria kontraktual dari aset keuangan yang pada tanggal tertentu menghasilkan arus kas yang merupakan pembayaran pokok dan bunga semata dari jumlah pokok terutang.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities

(i) Financial assets

In accordance with SFAS 109, there are three measurement classifications for financial assets:

(A) Amortised cost;
(B) Fair value through profit or loss ("FVTPL"); and
(C) Fair value through other comprehensive income ("FVOCI").

Financial assets are classified into these categories based on the business model within which they are held and their contractual cash flow characteristics. The business model reflects how groups of financial assets are managed to achieve a particular business objective.

A financial asset is measured at amortised cost only if it meets both of the following conditions and it is not designated as at FVTPL:

- *The financial assets is held within a business model whose objective is to hold the asset to collect contractual cash flows (held to collect); and*
- *Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest ("SPPI") on the principal amount outstanding.*

A financial asset measured at FVOCI only if it meets both of the following conditions and is not designated as at FVTPL:

- *The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling the financial asset (held to collect and sell); and*
- *Its contractual terms give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL.

Aset dapat dijual dari portofolio *held to collect* ketika terdapat peningkatan risiko kredit. Penghentian untuk alasan lain diperbolehkan namun jumlah penjualan tersebut harus tidak signifikan jumlahnya atau tidak sering.

Laba rugi yang belum direalisasi atas aset keuangan yang diklasifikasikan sebagai FVOCI ditangguhkan di pendapatan komprehensif lain sampai aset tersebut dihentikan.

Aset keuangan dapat ditetapkan sebagai FVTPL hanya jika ini dapat mengeliminasi atau mengurangi *accounting mismatch.*

Penilaian apakah arus kas kontraktual hanya merupakan pembayaran pokok dan bunga semata

Untuk tujuan penilaian ini, 'pokok' didefinisikan sebagai nilai wajar dari aset keuangan pada pengakuan awal. 'Bunga' didefinisikan sebagai imbalan untuk nilai waktu atas uang dan untuk risiko kredit yang terkait dengan jumlah pokok yang terutang selama periode waktu tertentu dan untuk risiko dan biaya pinjaman dasar lainnya (misalnya risiko likuiditas dan biaya administrasi), serta marjin keuntungan.

Dalam menilai apakah arus kas kontraktual adalah SPPI, Bank mempertimbangkan ketentuan kontraktual instrumen tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL.

Assets may be sold out of held to collect portfolios where there is an increase in credit risk. Disposals for other reasons are permitted but such sales should be insignificant in value or infrequent in nature.

Unrealised gains or losses of financial assets held at FVOCI deferred in other comprehensive income until the asset is derecognised.

Financial assets may be designated at FVTPL only if doing so eliminates or reduces accounting mismatch.

Assessment of whether contractual cash flows are solely payments of principal and interest

For the purposes of this assessment, 'principal' is defined as the fair value of the financial asset on initial recognition. 'Interest' is defined as consideration for the time value of money and for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs (e.g. liquidity risk and administrative costs), as well as profit margin.

In assessing whether the contractual cash flows are SPPI, the Bank considers the contractual terms of the instrument.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian apakah arus kas kontraktual hanya merupakan pembayaran pokok dan bunga semata (lanjutan)

Hal ini termasuk menilai apakah aset keuangan mengandung ketentuan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual sehingga tidak memenuhi kondisi ini. Dalam melakukan penilaian, Bank mempertimbangkan:

- Kejadian kontinjensi yang akan mengubah jumlah dan waktu arus kas;
- Fitur *leverage;*
- Persyaratan pelunasan dipercepat dan perpanjangan fasilitas;
- Ketentuan yang membatasi klaim Bank atas arus kas dari aset tertentu (seperti pinjaman *non-recourse*); dan
- Fitur yang memodifikasi imbalan dari nilai waktu atas uang (seperti penetapan ulang suku bunga berkala).

Penilaian model bisnis

Model bisnis mengacu pada bagaimana aset keuangan dikelola bersama untuk menghasilkan arus kas untuk Bank. Arus kas mungkin dihasilkan dengan menerima arus kas kontraktual, menjual aset keuangan atau keduanya. Model bisnis ditentukan pada tingkat agregasi di mana kelompok aset dikelola bersama untuk mencapai tujuan tertentu dan tidak bergantung pada niat manajemen pada instrumen individual.

Bank menilai model bisnis pada aset keuangan setidaknya pada tingkat lini bisnis atau pada di mana terdapat variasi mandat/tujuan dalam lini bisnis, pada lini bisnis produk atau pada tingkat *desk* yang lebih *granular* (misalnya sub-portofolio atau sub-lini bisnis).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Assessment of whether contractual cash flows are solely payments of principal and interest (continued)

This includes assessing whether the financial asset contains a contractual term that could change the timing or amount of contractual cash flows such that it would not meet this condition. In making the assessment, the Bank considers:

- *Contingent events that would change the amount and timing of cash flows;*
- *Leverage features;*
- *Prepayment and extension terms;*
- *Terms that limit the Bank's claim to cash flows from specified assets (e.g. non-recourse loans); and*
- *Features that modify consideration of the time value of money (e.g. periodical reset of interest rates).*

Business model assessment

Business model refers to how financial assets are managed together to generate cash flows for the Bank. This may be collecting contractual cash flows, selling financial assets or both. Business models are determined at a level of aggregation where groups of assets are managed together to achieve a particular objective and do not depend on management's intentions for individual instruments.

The Bank assesses the business model of financial assets at least at business line level or where there are varying mandates or objectives within a business line, at a more granular product business line or desk level (i.e. sub-portfolios or sub-business lines).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian model bisnis (lanjutan)

Penentuan model bisnis dilakukan dengan mempertimbangkan semua bukti relevan yang tersedia pada tanggal penilaian. Ini termasuk, tetapi tidak terbatas pada:

- bagaimana kinerja bisnis dan aset keuangan yang ada di dalam unit bisnis itu dievaluasi dan dilaporkan kepada manajemen. Tingkat pemisahan yang diidentifikasi untuk klasifikasi PSAK 109 harus konsisten dengan bagaimana portofolio aset dipisahkan dan dilaporkan kepada manajemen;
- risiko yang mempengaruhi kinerja unit bisnis dan aset keuangan yang dimiliki dalam unit bisnis itu dan khususnya bagaimana risiko itu dikelola; dan
- bagaimana manajer unit bisnis dikompensasi (misalnya, apakah kompensasi didasarkan pada nilai wajar dari aset yang dikelola atau pada arus kas kontraktual yang dikumpulkan).

Penentuan model bisnis dilakukan berdasarkan skenario yang diperkirakan akan terjadi oleh Bank dan tidak dalam kondisi sangat tertekan atau 'kondisi terburuk'. Jika aset dijual dalam kondisi yang tidak diharapkan oleh Bank untuk berlaku ketika aset diakui, klasifikasi aset keuangan yang ada dalam portofolio tidak disajikan secara tidak akurat, tetapi kondisi tersebut harus dipertimbangkan untuk aset yang diperoleh di masa mendatang.

Pemilihan model operasi dalam PSAK 109 dirancang sedemikian rupa sehingga akuntansi untuk instrumen di FVTPL adalah pilihan yang tepat/*conscious*.

Perubahan pada model bisnis atau pengenalan model bisnis baru ditentukan melalui proses persetujuan unit bisnis baru.

Bank dapat mereklasifikasi seluruh aset keuangan yang terpengaruh jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Business model assessment (continued)

Business model determinations are made considering all relevant evidence that is available at the date of the assessment. This includes, but is not limited to:

- *how the performance of the business and the financial assets held within that business unit are evaluated and reported to management. The level of segregation identified for SFAS 109 classification should be consistent with how asset portfolios are segregated and reported to senior management;*
- *the risks that affect the performance of the business unit and the financial assets held within that business unit and in particular the way those risks are managed; and*
- *how managers of the business unit are compensated (for example, whether the compensation is based on the fair value of the assets managed or on the contractual cash flows collected).*

Business model determinations are made on the basis of scenarios that the Bank reasonably expects to occur and not under highly stressed or 'worst case' conditions. Where assets are disposed of under conditions that the Bank did not reasonably expect to prevail when the assets were recognised, the classification of existing financial assets in the portfolio are not rendered inaccurate but the conditions in question should be considered for any assets acquired going forward.

The targeting operating model for SFAS 109 is designed such that accounting for instruments at FVTPL is a conscious choice.

Changes to business models or the introduction of new business models are determined through the new business unit approval process.

The Bank can reclassified all of its financial assets when and only, its business model for managing those financial assets changes.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(i) Aset keuangan (lanjutan)

Penilaian model bisnis (lanjutan)

Pengakuan

Pembelian dan penjualan aset keuangan diakui pada tanggal perdagangan dimana Bank memiliki komitmen untuk membeli atau menjual aset tersebut.

Pada saat pengakuan awal, aset keuangan diukur pada nilai wajar ditambah/dikurangi (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan aset keuangan. Pengukuran aset keuangan setelah pengakuan awal tergantung pada klasifikasi aset keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk perolehan suatu aset keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh.

Aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi pada awalnya dicatat sebesar nilai wajar dan biaya transaksinya dibebankan pada laporan laba rugi.

(ii) Liabilitas keuangan

Liabilitas keuangan diklasifikasikan ke dalam kategori sebagai berikut pada saat pengakuan awal:

- Liabilitas keuangan yang diukur pada nilai wajar melalui laporan laba rugi, yang memiliki 2 (dua) sub-klasifikasi, yaitu liabilitas keuangan yang ditetapkan demikian pada saat pengakuan awal dan liabilitas keuangan yang telah diklasifikasikan dalam kelompok diperdagangkan;
- Liabilitas keuangan lain yang tidak diklasifikasikan sebagai liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi dikategorikan dan diukur dengan biaya perolehan diamortisasi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(i) Financial assets (continued)

Business model assessment (continued)

Recognition

Purchases and sales of financial assets are recognised on the trade date at which the Bank commits to purchase or sell those assets.

A financial asset is initially measured at fair value plus/less (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to the acquisition of a financial asset. The subsequent measurement of financial assets depends on their classification.

Transaction costs include only those costs that are directly attributable to the acquisition of a financial asset are incremental costs that would not have been incurred if the instrument had not been acquired.

Financial assets carried at fair value through profit or loss are initially recognised at fair value and transaction costs are expensed in the profit or loss.

(ii) Financial liabilities

Financial liabilities are classified into the following categories at initial recognition:

- *Financial liabilities at fair value through profit or loss, which has 2 (two) sub-classifications, i.e., those designed as such upon initial recognition and those classified as held for trading;*
- *Other financial liabilities that are not classified as financial liabilities at fair value through profit or loss are categorised and measured at amortised cost.*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(ii) Liabilitas keuangan (lanjutan)

Pada saat pengakuan awal, liabilitas keuangan diukur pada nilai wajar ditambah (untuk *item* yang tidak diukur pada nilai wajar melalui laba rugi setelah pengakuan awal) biaya transaksi yang dapat diatribusikan secara langsung atas perolehan penerbitan liabilitas keuangan. Pengukuran liabilitas keuangan setelah pengakuan awal tergantung pada klasifikasi liabilitas keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk penerbitan suatu liabilitas keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh atau diterbitkan.

Liabilitas keuangan, biaya transaksi dikurangkan dari jumlah utang yang diakui pada pengakuan awal liabilitas. Biaya transaksi tersebut diamortisasi selama umur instrumen berdasarkan metode suku bunga efektif dan dicatat sebagai bagian dari beban bunga.

Liabilitas keuangan dihentikan pengakuannya jika liabilitas yang ditetapkan dalam kontrak dilepaskan, dibatalkan, atau kadaluarsa.

Jika suatu liabilitas keuangan yang ada digantikan dengan yang lain oleh pemberi pinjaman yang sama pada keadaan yang secara substansial berbeda, atau berdasarkan suatu liabilitas yang ada yang secara substansial telah diubah, maka pertukaran atau modifikasi tersebut diperlakukan sebagai penghentian pengakuan liabilitas awal dan pengakuan liabilitas baru, dan perbedaan nilai tercatat masing-masing diakui dalam laporan laba rugi dan penghasilan komprehensif lain.

(iii) Kontrak modifikasi

Penilaian apakah suatu aset keuangan telah dimodifikasi baik secara substansial maupun tidak substansial dilakukan oleh unit bisnis yang berwenang melakukan modifikasi atau restrukturisasi aset keuangan pada saat unit bisnis tersebut melakukan tindakan modifikasi atau restrukturisasi atas suatu aset keuangan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(ii) Financial liabilities (continued)

A financial liability is initially measured at fair value plus (for an item not subsequently measured at fair value through profit or loss) transaction costs that are directly attributable to financial liabilities issuance. The subsequent measurement of financial liabilities depends on their classification.

Transaction costs include only those costs that are directly attributable to the issuance of a financial liability and are incremental costs that would not have been incurred if the financial instruments had not been acquired or issued.

Financial liabilities, transaction costs are deducted from the amount of debt initially recognised. Such transactions costs are amortised over the terms of the instruments based on the effective interest rate method and are recorded as part of interest expense.

Financial liabilities are derecognised when the obligation under the liability is discharged, cancelled, or has expired.

Where an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the profit or loss and other comprehensive income.

(iii) Contract modification

An assessment of whether a financial asset has been modified substantially or not substantially is carried out by a business unit whose authorised to modify or restructure financial assets, when the business unit performs modification or restructure of a financial asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iii) Kontrak modifikasi (lanjutan)

Modifikasi aset keuangan dianggap substansial dan Bank akan berhenti mengakui aset keuangan awal ketika:

(a) aset keuangan (atau bagiannya) berakhir, yaitu jika debitur secara hukum dibebaskan dari tanggung jawab utama atas aset tersebut (atau bagiannya), baik melalui proses hukum maupun oleh kreditur pembuatan kontrak kredit baru (sebagai contoh, opsi *equity conversion*); atau
(b) terdapat konversi mata uang.

Bank kemudian akan mengukur aset keuangan yang telah dimodifikasi baik secara substansial maupun tidak substansial dengan cara berikut:

(a) Modifikasi Aset Keuangan yang Substansial

1) Saat arus kas kontraktual atas aset keuangan direnegosiasi atau dimodifikasi (antara lain ketika kredit direstrukturisasi) dimana renegosiasi atau modifikasi tersebut menghasilkan penghentian pengakuan aset keuangan, Bank akan mencatat aset keuangan tersebut sebagai aset keuangan baru/ modifikasian pada tanggal modifikasi/ negosiasi.
2) Selisih jumlah tercatat bruto aset keuangan awal dengan nilai wajar aset modifikasian diakui di laba rugi.
3) Pendapatan atau biaya transaksi yang terjadi sehubungan dengan kejadian modifikasi diakui sebagai bagian dari keuntungan atau kerugian atas modifikasi tersebut.
4) Selanjutnya, Bank melakukan penilaian apakah aset keuangan baru/modifikasian merupakan aset yang berasal dari aset keuangan memburuk.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iii) Contract modification (continued)

Modifications to financial assets are considered substantial and the Bank will cease to recognise the original financial assets when:
(a) the financial asset (or portion thereof) expires, that is, if the debtor is legally released from primary responsibility for the asset (or any portion thereof), either by legal process or by the creditor entering into a new credit contract (for example, the equity conversion option); or
(b) there is a currency conversion.

The Bank will measure the substantially and not substantially modified financial assets as follows:

(a) Substantial Modification of Financial Assets

1) When the contractual cashflow on a financial asset is renegotiated or modified (including when a credit is restructured) and the renegotiation or modification results in derecognition of the financial asset, therefore the Bank will record the financial asset as a new/ modified financial asset on the modification/ negotiation date.
2) The difference between the gross amount of the initial financial assets and the fair value of the modified assets recorded as profit or loss.
3) Transaction income or costs incurred in connection with a modification event recognised as part of gain or loss on the modification.
4) Next, Bank assess whether new/modified financial assets are assets originating from impaired financial assets.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iii) Kontrak Modifikasi (lanjutan)

(a) Modifikasi Aset Keuangan yang Substansial (lanjutan)

5) Pengakuan pendapatan bunga atas aset yang berasal dari aset keuangan memburuk ditentukan berdasarkan suku bunga efektif yang telah disesuaikan dengan risiko kredit (*risk-adjusted effective interest rate*) untuk mendiskontokan arus kas aset keuangan yang telah dimodifikasi.

(b) Modifikasi Aset Keuangan yang Tidak Substantial

1. Saat Bank melakukan renegosiasi atau modifikasi arus kas kontraktual atas aset keuangan (antara lain ketika kredit direstrukturisasi) yang tidak memenuhi kriteria modifikasi aset keuangan yang substansial di atas, maka renegosiasi atau modifikasi tersebut tidak menghasilkan penghentian pengakuan aset keuangan.

2. Jumlah tercatat bruto aset keuangan dihitung sebesar nilai kini (*net present value*) dari arus kas kontraktual yang telah dimodifikasi atau direnegosiasi yang didiskontokan menggunakan suku bunga efektif awal.

3. Kemudian mengakui keuntungan atau kerugian dari modifikasi (yaitu sebesar perubahan jumlah tercatat bruto aset keuangan) dalam laporan laba rugi.

4. Pendapatan atau biaya transaksi yang terjadi sehubungan dengan kejadian modifikasi diakui sebagai penyesuaian terhadap jumlah tercatat aset keuangan yang telah dimodifikasi dan diamortisasi selama sisa jangka waktu aset keuangan modifikasian tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iii) Contract Modification (continued)

(a) Substantial Modification of Financial Assets (ocntinued)

5) Recognition of interest income on assets originating from financial assets is calculated based on an effective interest rate adjusted for credit risk (risk-adjusted effective interest rate) to discount the cash flows of modified financial assets.

(b) Non-Substantial Modification of Financial Assets

1. When the Bank renegotiates or modifies contractual cash flows of financial assets (including when loans are restructured) that do not meet the criteria for substantial modification of financial assets above, the renegotiation or modification does not result in derecognition of the financial assets.

2. The gross carrying amount of financial assets is computed at the net present value of modified or renegotiated contractual cash flows, discounted at the original effective interest rate.

3. Bank then recognises the gain or loss from the modification (i.e the change in the gross carrying amount of the financial asset) in the profit or loss.

4. Transaction income or costs incurred in connection with a modification event are recognised as an adjustment to the carrying amount of the modified financial asset and amortised over the remaining term of the modified financial asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iv) Penentuan nilai wajar

Nilai wajar adalah harga yang akan diterima untuk menjual suatu aset atau harga yang akan dibayar untuk mengalihkan suatu liabilitas dalam transaksi teratur (*orderly transaction*) antara pelaku pasar (*market participants*) pada tanggal pengukuran di pasar utama atau, jika tidak terdapat pasar utama, di pasar yang paling menguntungkan dimana Bank memiliki akses pada tanggal tersebut. Nilai wajar liabilitas mencerminkan risiko wanprestasinya.

Jika tersedia, Bank mengukur nilai wajar instrumen keuangan dengan menggunakan harga kuotasian di pasar aktif untuk instrumen tersebut.

Instrumen keuangan dianggap memiliki kuotasi di pasar aktif jika harga kuotasi tersedia sewaktu-waktu dan dapat diperoleh secara rutin dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service* atau *regulatory agency*), dan harga tersebut mencerminkan transaksi pasar yang aktual dan rutin dalam suatu transaksi yang wajar. Jika kriteria di atas tidak terpenuhi, maka pasar aktif dinyatakan tidak tersedia. Indikasi-indikasi dari pasar tidak aktif adalah terdapat selisih yang besar antara harga penawaran dan permintaan atau kenaikan signifikan dalam selisih harga penawaran dan permintaan dan hanya terdapat beberapa transaksi terkini.

Bukti terbaik atas nilai wajar instrumen keuangan pada saat pengakuan awal adalah harga transaksi, yaitu nilai wajar dari pembayaran yang diberikan atau diterima. Jika Bank menetapkan bahwa nilai wajar pada pengakuan awal berbeda dengan harga transaksi dan nilai wajar tidak dapat dibuktikan dengan harga kuotasian di pasar aktif untuk aset atau liabilitas yang sejenis atau berdasarkan teknik penilaian yang hanya menggunakan data dari pasar yang dapat diobservasi, maka nilai wajar instrumen keuangan pada saat pengakuan awal disesuaikan untuk menangguhkan perbedaan antara nilai wajar pada saat pengakuan awal dan harga transaksi. Setelah pengakuan awal, perbedaan tersebut diamortisasi dan diakui dalam laba rugi sepanjang umur dari instrumen tersebut.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iv) Determination of fair value

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date in the principal market or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

When available, the Bank measures the fair value of a financial instrument using the quoted price in an active market for that instrument.

A financial instrument is regarded as quoted in an active market if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency, and those prices represent actual and regularly occurring market transactions on an arm's length basis. If the above criteria are not met, the market is regarded as being inactive. Indications that a market is inactive are when there is a wide bid-offer spread or significant increase in the bid-offer spread or there are few recent transactions.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e., the fair value of the consideration given or received. If the Bank determines that the fair value at initial recognition differs from the transaction price and the fair value is evidenced neither by a quoted price in an active market for an identical asset or liability nor based on a valuation technique that uses only data from observable markets, then the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price. Subsequently, that difference is amortised and recognised in profit or loss on over the life of the instrument.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(iv) Penentuan nilai wajar (lanjutan)

Untuk instrumen keuangan yang tidak mempunyai harga pasar, estimasi atas nilai wajar ditetapkan dengan mengacu pada nilai wajar instrumen lain yang substansinya sama atau dihitung berdasarkan arus kas yang diharapkan terhadap aset bersih efek-efek tersebut. Untuk penyertaan saham yang nilai wajarnya tidak tersedia, estimasi atas nilai wajar dinyatakan sebesar biaya perolehan.

Nilai wajar untuk semua instrumen keuangan lainnya ditentukan dengan menggunakan teknik penilaian. Dengan teknik ini, nilai wajar merupakan suatu estimasi yang dihasilkan dari data yang dapat diobservasi dari instrumen keuangan yang sama, menggunakan model-model untuk mendapatkan estimasi nilai kini dari arus kas masa depan yang diharapkan atau teknik penilaian lainnya menggunakan input (sebagai contoh nilai tukar mata uang asing, volatilitas, dan *counterparty spreads*) yang tersedia pada tanggal laporan posisi keuangan.

(v) Penentuan biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset atau liabilitas keuangan yang diukur pada saat pengakuan awal, dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif dengan menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya dan dikurangi cadangan kerugian penurunan nilai.

Kerugian penurunan nilai dilaporkan sebagai pengurang dari nilai tercatat dari aset keuangan dalam kelompok biaya perolehan diamortisasi, dan diakui di dalam laporan laba rugi sebagai "Kerugian penurunan nilai aset keuangan".

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(iv) Determination of fair value (continued)

For financial instruments with no quoted market price, a reasonable estimate of the fair value is determined by reference to the current market value of another instrument which substantially have the same characteristic or calculated based on the expected cash flows of the underlying net asset base of the marketable securities. For the investment in shares do not have readily determinable fair values, the estimated fair value recognised as at acquisition cost.

For all other financial instruments, fair value is determined using valuation techniques. In these techniques, fair values are estimated from observable data in respect of similar financial instruments, using models to estimate the present value of expected future cash flows or other valuation techniques, using inputs (for example, foreign exchange rates, volatilities and counterparty spreads) existing at the dates of the statement of financial position.

(v) Determination of amortised cost

The amortised cost of a financial asset or financial liability is the amount at which the financial asset or liability is measured at initial recognition, less principal repayments, plus or less the cumulative amortisation using the effective interest method of any difference between the initial amount recognised and the maturity amount and minus any allowance for impairment losses.

The impairment loss is reported as a deduction from the carrying value of the financial assets classified as amortised cost and recognised in the statement of profit or loss as "Impairment losses on financial assets".

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(v) Penentuan biaya perolehan diamortisasi (lanjutan)

Tingkat suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi arus kas di masa datang selama perkiraan umur dari aset keuangan atau liabilitas keuangan (atau jika lebih tepat, digunakan periode yang lebih singkat) untuk memperoleh nilai tercatat bersih pada saat pengakuan awal. Pada saat menghitung tingkat suku bunga efektif, Bank mengestimasi arus kas di masa datang dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa mendatang.

Perhitungan suku bunga efektif mencakup biaya transaksi dan seluruh imbalan/provisi dan bentuk lain yang dibayarkan atau diterima yang merupakan bagian tak terpisahkan dari suku bunga efektif.

(vi) Penghentian pengakuan

Dalam transaksi dimana Bank secara substansial tidak memiliki atau tidak mentransfer seluruh risiko dan manfaat atas kepemilikan aset keuangan, Bank menghentikan pengakuan aset tersebut jika Bank tidak lagi memiliki pengendalian atas aset tersebut. Hak dan kewajiban yang masih dimiliki dalam transfer tersebut diakui secara terpisah sebagai aset atau liabilitas. Dalam transfer dimana pengendalian atas aset masih dimiliki, Bank tetap mengakui aset yang ditransfer tersebut sebesar keterlibatan berkelanjutan, dimana tingkat keberlanjutan Bank dalam aset yang ditransfer adalah sebesar perubahan nilai aset yang ditransfer.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(v) Determination of amortised cost (continued)

The effective interest rate is the rate that exactly discounts the estimated future cash flows through the expected life of the financial asset or financial liability (or, where appropriate, a shorter period) to the net carrying amount at initial recognition. When calculating the effective interest rate, the Bank estimates future cash flows considering all contractual terms of the financial instrument, but does not consider any future credit losses.

The calculation of the effective interest rate includes transaction costs and all fees and provisions paid or received that are an integral part of the effective interest rate.

(vi) Derecognition

In transactions in which the Bank neither retains nor transfers substantially all the risks and rewards of ownership of a financial asset, the Bank derecognises the asset if it does not retain control over the asset. The rights and obligations retained in the transfer are recognised separately as assets and liabilities as appropriate. In transfers in which control over the asset is retained, the Bank continues to recognise the asset to the extent of its continuing involvement, determined by the extent to which it is exposed to changes in the value of the transferred asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

d. Aset dan liabilitas keuangan (lanjutan)

(vi) Penghentian pengakuan (lanjutan)

Bank menghapusbukukan aset keuangan dan cadangan kerugian penurunan nilai terkait, pada saat Bank menentukan bahwa aset keuangan tersebut tidak dapat ditagih seluruhnya. Keputusan ini diambil setelah mempertimbangkan informasi seperti telah terjadinya perubahan signifikan pada posisi keuangan debitur/penerbit aset keuangan sehingga debitur/penerbit aset keuangan tidak lagi dapat melunasi kewajibannya, atau hasil penjualan agunan tidak akan cukup untuk melunasi seluruh eksposur pinjaman yang diberikan.

e. Saling hapus

Aset keuangan dan liabilitas keuangan disalinghapuskan dan nilai bersihnya dilaporkan pada laporan posisi keuangan jika, dan hanya jika Bank memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan adanya maksud untuk menyelesaikan liabilitas secara bersamaan.

Hak saling hapus tidak kontinjen atas peristiwa di masa depan dan dapat dipaksakan secara hukum di dalam situasi bisnis yang normal, dan dalam peristiwa gagal bayar atau kebangkrutan dari Bank atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah bersih hanya jika diperkenankan oleh standar akuntansi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

d. Financial assets and liabilities (continued)

(vi) Derecognition (continued)

The Bank write off a financial asset and any related allowance for impairment losses, when the Bank determines that the financial asset is completely uncollectible. This determination is reached after considering information such as the occurrence of significant changes in the financial position of debtor/financial asset's issuer such that the debtor/financial asset's issuer can no longer pay the obligation, or that proceeds from collateral will not be sufficient to pay back the entire exposure.

e. Offsetting

Financial assets and liabilities are offset and the net amount is reported in the statements of financial position if only the Bank has a legal right to offset the recognised amounts and there is an intention to settle on net basis, or realise the asset and settle the liability simultaneously.

The legally enforceable right must not be contingent on future events and must be enforceable in the normal course of business and in the event of default, insolvency or bankruptcy of the Bank or the counterparty.

Income and expenses are presented on a net basis only when permitted by the accounting standards.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi instrumen keuangan

Klasifikasi aset dan liabilitas keuangan

Bank mengklasifikasikan instrumen keuangan ke dalam klasifikasi tertentu yang mencerminkan sifat dari informasi dan mempertimbangkan karakteristik dari instrumen keuangan tersebut. Klasifikasi ini dapat dilihat pada tabel berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and Reclassification of financial instruments

Classification of financial assets and liabilities

The Bank classifies the financial instruments into classes that reflects the nature of information and take into account the characteristic of those financial instruments. The classification can be seen in the table below:

Kategori yang didefinisikan oleh PSAK 109 /*Category as defined by SFAS 109*		**Golongan (ditentukan oleh Bank)/** ***Classes (as determined by the Bank)***
Aset keuangan/ *Financial assets*	Biaya perolehan diamortisasi/*Amortised cost*	Kas/*Cash*
		Giro pada Bank Indonesia/*Current accounts with Bank Indonesia*
		Giro pada bank lain/*Current accounts with other banks*
		Penempatan pada Bank Indonesia dan bank lain/ *Placements with Bank Indonesia and other banks*
		Efek-efek/*Marketable securities*
		Tagihan akseptasi/*Acceptances receivable*
		Pinjaman yang diberikan/ *Loans*
		Efek-efek yang dibeli dengan janji dijual kembali/*Securities purchased under resale agreements*
		Pendapatan bunga yang masih akan diterima/*Interest income receivables*
		Aset lain-lain/*Other assets*
	Aset keuangan yang diukur pada nilai wajar melalui laba rugi/*Financial assets measured at fair value through profit or loss*	Efek-efek/*Marketable securities*
		Penyertaan saham/*Investments in shares*
	Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain/*Financial assets measured at fair value through other comprehensive income*	Efek-efek/*Marketable securities*
		Penyertaan saham/*Investments in shares*
Liabilitas keuangan/ *Financial liabilities*	Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi/*Financial liabilities at amortised cost*	Simpanan nasabah/*Deposits from customers*
		Simpanan dari bank lain/*Deposits from other banks*
		Efek-efek yang dijual dengan janji dibeli kembali/*Securities sold under repurchase agreement*
		Efek-efek yang diterbitkan/*Securities issued*
		Liabilitas akseptasi/*Acceptances payable*
		Akrual dan liabilitas lain-lain/*Accruals and other liabilities*
Komitmen dan kontinjensi/ *Commitment and contingency*	Fasilitas pinjaman yang belum digunakan/*Unused loan facilities*	
	Garansi yang diterbitkan/*Guarantees issued*	

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi instrumen keuangan (lanjutan)

Reklasifikasi aset keuangan

Bank diperkenankan untuk melakukan reklasifikasi atas aset keuangan yang dimiliki jika Bank mengubah model bisnis untuk pengelolaan aset keuangan.

Perubahan model bisnis sifatnya harus berdampak secara signifikan terhadap kegiatan operasional Bank seperti memperoleh, melepaskan, atau mengakhiri suatu lini bisnis. Selain itu, Bank perlu membuktikan adanya perubahan tersebut kepada pihak eksternal.

Bank akan mereklasifikasi seluruh aset keuangan yang terkena dampak dari perubahan model bisnis. Perubahan tujuan model bisnis Bank harus berdampak sebelum tanggal reklasifikasi.

Yang bukan merupakan perubahan model bisnis adalah:

a. perubahan intensi berkaitan dengan aset keuangan tertentu (bahkan dalam situasi perubahan signifikan dalam kondisi pasar);
b. hilangnya sementara pasar tertentu untuk aset keuangan; dan
c. pengalihan aset keuangan antara bagian dari Bank dengan model bisnis berbeda.

Dampak Reklasifikasi Aset Keuangan

Dampak reklasifikasi aset keuangan pada laba rugi atau ekuitas dan pengukuran awalnya adalah sebagai berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and Reclassification of financial instruments (continued)

Reclassification of financial assets

The Bank can reclassify its all of its financial assets when and only, its business model for managing those financial assets changes.

The characteristic of business model changes must significantly impact to the Bank operational activities such as collecting, disposing or terminating a business line. In addition, the Bank has to prove the changes to external parties.

The Bank will reclassify all financial assets impacted by business model changes. Changes of the objective of the Bank's business model must be impacted before reclassification date.

The following lists are not changes in business model:

a. changes in intention in relation with certain financial asset (even in situations of significant changes in market conditions);
b. temporary loss of certain markets for financial assets; and
c. transfer of financial asset between Bank with different business model.

Impact of Reclassificaton of Financial Assets

The impact of reclassification of financial asset on profit or loss or equity and its initial measurement is as follows:

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

f. Klasifikasi dan Reklasifikasi Instrumen keuangan (lanjutan)

Dampak Reklasifikasi Aset Keuangan (lanjutan)

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

f. Classification and Reclassification of Financial Instruments (continued)

Impact of Reclassificaton of Financial Assets (continued)

Reklasifikasi/ *Reclassification*		**Dampak Terhadap Laba Rugi/ *Impact on profit or loss***	**Dampak Terhadap Ekuitas/ *Impact on equity***	**Nilai Tercatat Awal Setelah Reklasifikasi/ *Initial Carrying Value After Reclassification***
Dari/ *From*	**Ke/ *To***			
FVTPL	*Amortised Cost*	-	-	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru/ *Fair value at the reclassification date becomes its new gross carrying amount.* 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ *Effective interest rate is determined at the fair value of the asset at reclassification date.*
	FVOCI	-	-	1. Aset keuangan tetap diukur pada nilai wajarnya/ *Financial assets is measured at fair value.* 2. Suku bunga efektif ditentukan pada dasar nilai wajar aset pada tanggal reklasifikasi/ *Effective interest rate is determined at the fair value of the asset at reclassification date.*
Amortised Cost	FVTPL	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ *Difference in carrying amount before reclassification and fair value after reclassification*	-	Nilai wajarnya diukur pada tanggal reklasifikasi/ *Fair value is measured at reclassification date.*
	FVOCI	-	Selisih antara nilai tercatat sebelum reklasifikasi dan nilai wajar setelah reklasifikasi/ *Difference in carrying amount before reclassification and fair value after reclassification*	1. Nilai wajarnya diukur pada tanggal reklasifikasi/ *Fair value is measured at reclassification date.* 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ *Effective interest rate and expected credit loss is not adjusted.*
FVOCI	*Amortised Cost*	-	Keuntungan atau kerugian kumulatif dihapus dari ekuitas dan disesuaikan terhadap nilai wajar/ *Cumulative gain or loss on OCI is adjusted against the fair value of the financial asset*	1. Nilai wajar pada tanggal reklasifikasi menjadi jumlah tercatat bruto yang baru ditambah atau dikurangi keuntungan atau kerugian kumulatif sebelumnya/ *Fair value at the reclassification date becomes its new gross carrying amount by added or deducted the previous cumulative gain or loss.* 2. Suku bunga efektif dan pengukuran kerugian kredit ekspektasian tidak perlu disesuaikan/ *Effective interest rate and expected credit loss is not adjusted.*
	FVOCI	Keuntungan atau kerugian kumulatif direklasifikasi dari ekuitas menjadi laba rugi/ *Cumulative gain or loss on OCI is reclassified to profit or loss*		Aset keuangan tetap diukur pada nilai wajarnya/ *Financial assets is measured at fair value*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan

Bank menilai dengan dasar perkiraan masa yang akan datang kerugian kredit ekspektasian (*Expected Credit Loss*/"ECL") terkait dengan instrumen aset keuangan yang dicatat pada biaya perolehan diamortisasi dan nilai wajar melalui penghasilan komprehensif lain. Metodologi penurunan nilai yang ditampilkan tergantung kepada apakah tidak terjadi peningkatan risiko kredit yang signifikan untuk aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain (FVOCI). Jika pada tanggal pelaporan, risiko kredit atas aset keuangan tidak meningkat secara signifikan sejak pengakuan awal, maka Bank akan mengukur penyisihan kerugian untuk aset keuangan tersebut sejumlah ECL 12 bulan. Jika risiko kredit atas aset keuangan telah meningkat secara signifikan dari pengakuan awal, maka Bank akan menyajikan penyisihan kerugian sejumlah ECL *lifetime*.

ECL 12 bulan dan ECL *lifetime*

ECL 12 bulan adalah bagian dari kerugian kredit ekspektasian sepanjang umurnya yang merepresentasikan ECL yang timbul dari peristiwa gagal bayar aset keuangan yang mungkin terjadi dalam 12 bulan setelah tanggal pelaporan (atau periode yang lebih pendek jika umur aset keuangan yang diharapkan kurang dari 12 bulan). ECL 12 bulan dibobot oleh probabilitas terjadinya *default* dimaksud.

ECL *lifetime* adalah kerugian yang diakibatkan dari semua kejadian default yang mungkin terjadi selama perkiraan waktu umur hidup aset keuangan.

Staging Criteria

Aset keuangan harus dialokasikan ke salah satu dari tiga tahap penurunan nilai (*stage* 1, *stage* 2, *stage* 3) dengan menentukan apakah terjadi peningkatan risiko kredit yang signifikan atas aset keuangan sejak pengakuan awal atau apakah fasilitas tersebut gagal bayar pada setiap tanggal pelaporan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets

The Bank assesses on a forward-looking basis the expected credit loss associated with its financial assets instruments carried at amortised cost and fair value at other comprehensive income. The impairment methodology applied depends on whether there has been a significant increase in credit risk to financial asset measured at amortised cost and at fair value through other comprehensive income (FVOCI). If at the reporting date, credit risk on financial asset has not increased significantly since initial recognition, the Bank shall measure the allowance for losses for that financial asset at the amount of 12 (twelve) months expected losses. If the credit risk on that financial asset has increased significantly since initial recognition, the Bank shall measure the allowance for losses at the amount of expected credit losses over its lifetime.

12-month ECL and Lifetime ECL

12-month ECL is the portion of ECL that result from default events that are possible within the 12-months after reporting date (or the shorter period if expected life of financial asset is less than 12 months). 12-month ECL is weighted by probability of default.

Lifetime ECL is the ECL that result from all possible default events over the expected life of financial asset.

Staging Criteria

Financial asset must be allocated to one of three stages of impairment (stage 1, stage 2, stage 3) by determining whether there is a significant increase in credit risk on the financial asset since initial recognition or whether the facility has defaulted on each reporting date.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

Stage 1: ECL diakui pada saat pengakuan awal instrumen keuangan dan merepresentasikan kekurangan kas sepanjang umur aset yang timbul dari kemungkinan gagal bayar di masa yang akan datang dalam kurun waktu dua belas bulan sejak tanggal pelaporan. ECL terus ditentukan oleh dasar ini sampai timbul peningkatan risiko kredit yang signifikan pada instrumen tersebut atau instrumen tersebut telah mengalami penurunan nilai kredit. Jika suatu instrumen tidak lagi dianggap menunjukkan peningkatan risiko kredit yang signifikan, maka ECL dihitung kembali berdasarkan basis dua belas bulan.

Stage 2: mencakup aset keuangan yang mengalami peningkatan signifikan atas risiko kredit ("SICR") sejak pengakuan awal (kecuali jika memiliki risiko kredit rendah pada tanggal pelaporan), namun tidak memiliki bukti penurunan nilai yang objektif. Untuk aset ini, ECL *lifetime* dihitung. ECL *lifetime* adalah kerugian pinjaman yang diharapkan yang dihasilkan dari semua kejadian *default* yang mungkin terjadi selama perkiraan umur dari aset keuangan.

Bank menggunakan berbagai pengukuran kualitatif dan kuantitatif dalam menilai SICR seperti berikut:

Pinjaman yang diberikan

a. Kriteria kuantitatif
   Akun-akun dengan 30 hari tunggakan ("DPD") dianggap telah mengalami peningkatan risiko kredit yang signifikan.

b. Kriteria kualitatif
   Debitur dengan DPD kurang dari 30 hari yang telah direstrukturisasi (kecuali debitur restrukturisasi akibat dampak pandemi COVID-19) dianggap memiliki kenaikan signifikan atas risiko kredit.

Stage 3: Aset hanya akan dianggap mengalami penurunan nilai dan kerugian kredit ekspektasian sepanjang umurnya diakui, jika terdapat bukti objektif penurunan nilai yang dapat diobservasi. Faktor-faktor yang diobservasi ini serupa dengan indikator bukti

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

Stage 1: ECL are recognised at the time of initial recognition of a financial instrument and represent the lifetime cash shortfalls arising from possible default events up to twelve months into the future from the reporting date. ECL continue to be determined on this basis until there is either a significant increase in the credit risk of an instrument or the instrument becomes credit-impaired. If an instrument is no longer considered to exhibit a significant increase in credit risk, ECL will revert to being determined on a 12-month basis.

Stage 2: includes financial assets that experience a significant increase in credit risk ("SICR") since initial recognition (unless having low credit risk at the reporting date), but do not have objective evidence of impairment. For these assets, Lifetime ECL will be calculated. Lifetime ECL are the ECL that results from all possible default events over the expected life of financial asset.

The Bank uses a number of qualitative and quantitative measures in assessing SICR as follows:

Loans

a. Quantitative criteria
   Accounts that are 30 days past due ("DPD") are considered to have experienced a significant increase in credit risk.

b. Qualitative criteria
   Debtors with DPD less than 30 days which have been restructured (except for restructured debtors as a result of the COVID-19 pandemic) which is considered to have a significant increase in credit risk.

Stage 3: An asset is only considered credit impaired and lifetime expected credit losses recognised, if there is observed objective evidence of impairment. These factors are similar to the indicators of objective

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

objektif penurunan nilai pada PSAK 109, termasuk antara lain aset gagal bayar atau mengalami kesulitan keuangan yang signifikan atau mengalami *forbearance* atas kredit yang mengalami penurunan nilai (disebut sebagai 'aset *Stage* 3'). Pengukuran kerugian kredit ekspektasian di seluruh tahapan aset diperlukan untuk mencerminkan jumlah yang tidak bias dan rata-rata probabilitas tertimbang yang ditentukan dengan mengevaluasi serangkaian kemungkinan yang dapat terjadi menggunakan informasi yang wajar dan dapat didukung dengan peristiwa di masa lampau, kondisi saat ini dan proyeksi terkait dengan kondisi ekonomis di masa depan.

Aset keuangan yang mengalami penurunan nilai (atau gagal bayar) merupakan aset yang setidaknya telah memiliki tunggakan lebih dari 90 hari atas pokok dan/atau bunga atau memiliki peringkat kredit tertentu (*default*). Aset keuangan juga dianggap mengalami penurunan nilai kredit dimana debitur kemungkinan besar tidak akan membayar dengan terjadinya satu atau lebih kejadian yang teramati yang memiliki dampak menurunkan jumlah estimasi arus kas masa depan dari aset keuangan tersebut. Cadangan kerugian penurunan nilai terhadap aset keuangan yang mengalami penurunan nilai ditentukan berdasarkan penilaian terhadap arus kas yang dapat dipulihkan berdasarkan sejumlah skenario, termasuk realisasi jaminan yang dimiliki jika memungkinkan. ECL akan mencerminkan rata-rata tertimbang dari skenario berdasarkan probabilitas dari skenario yang relevan untuk terjadi. Cadangan kerugian penurunan nilai merupakan selisih antara nilai sekarang dari arus kas yang diperkirakan akan dipulihkan, didiskontokan pada suku bunga efektif awal, dan nilai tercatat bruto instrumen sebelum penurunan nilai kredit.

Periode yang diperhitungkan ketika mengukur kerugian kredit ekspektasian adalah periode kontrak aset keuangan. Umur ekspektasian dapat dipengaruhi oleh pembayaran dimuka dan periode kontrak maksimum melalui opsi perpanjangan kontrak. Untuk portofolio *revolving* tertentu, umur ekspektasian dinilai sepanjang periode dimana Bank terekspos dengan risiko kredit (berdasarkan durasi waktu yang dibutuhkan untuk fasilitas kredit ditarik).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

of impairment under SFAS 109, this includes, amongst other factors, assets in default or experiencing significant financial difficulty, or experiencing forbearance on impaired credit (mentioned as 'Stage 3 asset'). The measurement of expected credit losses across all stages is required to reflect an unbiased and probability weighted amount that is determined by evaluating a range of reasonably possible outcomes using reasonable and supportable information about past events, current conditions and forecasts of future economic conditions.

Financial assets that are credit impaired (or in default) represent those that are at least more than 90 days past due in respect of principal and/or interest or has certain credit grades (default). Financial assets are also considered to be credit impaired where the debtors are unlikely to pay on the occurrence of one or more observable events that have a detrimental impact on the estimated future cash flows of the financial asset. Loss provisions against credit impaired financial assets are determined based on an assessment of the recoverable cash flows under a range of scenarios, including the realisation of any collateral held where appropriate. The ECL will reflect weighted average of the scenarios based on the probability of the relevant scenario to occur. The loss provisions held represent the difference between the present value of the cash flows expected to be recovered, discounted at the instrument's original effective interest rate, and the gross carrying value of the instrument prior to any credit impairment.

The period considered when measuring expected credit loss is the contractual term of the financial asset. The expected life may be impacted by prepayments and the maximum contractual term by extension options. For certain revolving portfolios, the expected life is assessed over the period that the Bank is exposed to credit risk (which is based on the length of time it takes for credit facilities to be withdrawn).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

Untuk aset yang diukur pada biaya perolehan diamortisasi, saldo di neraca mencerminkan aset bruto dikurangi kerugian kredit ekspektasian. Untuk instrumen utang dalam kategori FVOCI, saldo di neraca mencerminkan nilai wajar dari instrumen dikurangi dengan cadangan kerugian kredit ekspektasian.

Untuk menentukan kerugian kredit ekspektasian komponen-komponen ini akan diperhitungkan secara bersama-sama dan didiskontokan ke tanggal laporan keuangan menggunakan diskonto berdasarkan suku bunga efektif.

PSAK 109 mensyaratkan penyertaan informasi tentang kejadian masa lalu, kondisi saat ini dan perkiraan kondisi ekonomi masa depan. Perkiraan perubahan dalam kerugian pinjaman yang diharapkan harus mencerminkan dan secara langsung konsisten dengan perubahan dalam data terkait yang diobservasi dari periode ke periode. Perhitungan ECL ini membutuhkan estimasi *forward-looking* dari *Probability of Default* (PD), *Loss Given Default* (LGD) dan *Exposure At Default* (EAD).

Untuk komitmen pinjaman dan kontrak jaminan keuangan, tanggal pada saat Bank menjadi pihak dalam suatu komitmen yang tidak dapat dibatalkan merupakan tanggal pengakuan awal untuk keperluan penerapan persyaratan penurunan nilai.

a. *Probability of Default ("PD")*

Probabilitas yang timbul di suatu waktu dimana debitur mengalami gagal bayar, dikalibrasikan sampai dengan periode 12 bulan dari tanggal laporan (*Stage* 1) atau sepanjang umur (*Stage* 2 dan 3) dan digabungkan pada dampak asumsi ekonomi masa depan yang memiliki risiko kredit. PD diestimasikan pada *point in time* dimana hal ini berfluktuasi sejalan dengan siklus ekonomi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

For assets measured at amortised cost, the balance sheet amount reflects the gross asset less the expected credit losses. For debt instruments held at FVOCI, the balance sheet amount reflects the instrument's fair value less the expected credit losses.

To determine the expected credit loss, these components are multiplied together and discounted to the balance sheet date using the effective interest rate as the discount rate.

SFAS 109 requires supportable information about past events, current condition and forecasts of future economic conditions. Estimated movement on expected credit losses have to be reflected and directly consistent with changes in observed related data over the period. This ECL calculation needs forward-looking estimation from Probability of Default (PD), Loss Given Default (LGD) and Exposure At Default (EAD).

For loan commitments and financial guarantee contracts, the date when the Bank become a party in a irrevocable commitment is the date of initial recognition for implementation of impairment purposes.

a. Probability of Default ("PD")

The probability at a point in time that a counterparty will default, calibrated over up to 12 months from the reporting date (Stage 1) or over the lifetime of the product (Stage 2 and 3) and incorporating the impact of forward-looking economic assumptions that have an effect on credit risk. PD is estimated at a point in time that means it will fluctuate in line with the economic cycle.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

g. Penurunan nilai dari aset keuangan (lanjutan)

b. *Loss Given Default ("LGD")*

Kerugian yang diperkirakan akan timbul dari debitur yang mengalami gagal bayar dengan menggabungkan dampak dari asumsi ekonomi masa depan yang relevan (jika ada) dimana hal ini mewakili perbedaan antara arus kas kontraktual yang akan jatuh tempo dengan arus kas yang diharapkan untuk diterima. Bank mengestimasikan LGD berdasarkan data historis dari tingkat pemulihan dan memperhitungkan pemulihan yang berasal dari jaminan terhadap aset keuangan dengan mempertimbangkan asumsi ekonomi di masa depan jika relevan.

c. *Exposure at Default ("EAD")*

Perkiraan nilai eksposur neraca pada saat gagal bayar dengan mempertimbangkan bahwa perubahan ekspektasi yang diharapkan selama masa eksposur. Hal ini menggabungkan dampak penarikan fasilitas yang *committed* pembayaran pokok dan bunga, amortisasi dan pembayaran dipercepat, bersama dengan dampak asumsi ekonomi masa depan jika relevan.

h. Penurunan nilai dari aset non-keuangan

Nilai tercatat aset non-keuangan Bank, selain aset pajak tangguhan, dikaji pada setiap tanggal pelaporan untuk menentukan ada tidaknya indikasi penurunan nilai. Untuk tujuan pengujian penurunan nilai, aset yang tidak dapat diuji secara individual dapat digabungkan ke dalam kelompok aset terkecil yang menghasilkan arus kas masuk dari penggunaan berkelanjutan yang sebagian besar independen dari arus kas masuk dari aset lainnya (Unit Penghasil Kas atau "CGU"). Jika terdapat indikasi adanya penurunan nilai tersebut, maka nilai terpulihkan aset diestimasi.

Kerugian penurunan nilai diakui jika nilai tercatat suatu aset atau CGU melebihi estimasi nilai terpulihkannya. Nilai terpulihkan suatu aset adalah nilai yang terbesar antara nilai pakai aset atau CGU dan nilai wajar dikurangi biaya penjualan. Dalam penentuan nilai pakai aset, estimasi arus kas masa depan didiskontokan menggunakan tingkat diskonto sebelum pajak yang menggambarkan penilaian pasar kini atas nilai waktu dari uang dan risiko yang terkait dengan aset yang bersangkutan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

g. Impairment of financial assets (continued)

b. Loss Given Default ("LGD")

The loss that is expected to arise on default, incorporating the impact of relevant forward looking economic assumptions (if any), which represents the difference between the contractual cash flows due and those that the Bank expects to receive. The Bank estimates LGD based on the historical recovery rates and considers the recovery of any collateral that is integral to the financial assets, taking into account forward looking economic assumptions if relevant.

c. Exposure at Default ("EAD")

The expected balance sheet exposure at the time of default, taking into account that expected change in exposure over the lifetime of the exposure. This incorporates the impact of drawdowns of committed facilities, repayments of principal and interest, amortisation and prepayments, together with the impact of forward looking economic assumptions where relevant.

h. Impairment of non-financial assets

The carrying amount of the Bank's non-financial assets, other than deferred tax assets, are reviewed at each reporting date to determine whether there is any indication of impairment. For the purpose of impairment testing, assets that cannot be tested individually are grouped together into the smallest group of assets that generates cash inflows from continuing use that are largely independent of the cash inflows of other assets (Cash Generating Units or "CGU"). If any such indication exists, then the asset's recoverable amount is estimated.

An impairment loss is recognised if the carrying amount of an asset or CGU exceeds its estimated recoverable amount. The recoverable amount of an asset or CGU is the greater of its value in use and its fair value less cost to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

h. Penurunan nilai dari aset non-keuangan (lanjutan)

Kerugian penurunan nilai atas aset non-keuangan yang diakui pada tahun sebelumnya dikaji pada setiap tanggal pelaporan keuangan untuk menilai apakah terdapat indikasi bahwa rugi penurunan nilai yang telah diakui sebelumnya telah menurun atau tidak ada lagi. Kerugian penurunan nilai, kecuali untuk *goodwill*, dipulihkan jika terdapat perubahan estimasi yang digunakan untuk menentukan nilai terpulihkan. Jumlah kerugian penurunan nilai yang dibalik tidak boleh menyebabkan nilai aset melebihi nilai tercatat bersih setelah penyusutan atau amortisasi, seandainya tidak ada kerugian penurunan nilai yang diakui.

i. Kas dan setara kas

Kas meliputi kas dan kas dalam khasanah. Untuk tujuan laporan arus kas, kas dan setara kas mencakup kas, giro pada Bank Indonesia, giro pada bank lain, penempatan pada Bank Indonesia dan bank lain, dan Sertifikat Bank Indonesia yang jatuh tempo dalam 3 (tiga) bulan atau kurang sejak tanggal perolehan yang tidak dijaminkan atau dibatasi penggunaannya.

j. Giro pada Bank Indonesia dan bank lain

Giro pada Bank Indonesia dan bank lain diklasifikasikan sebagai aset keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan.

Giro pada Bank Indonesia dan bank lain dinyatakan sebesar saldo giro dikurangi dengan cadangan kerugian penurunan nilai.

k. Penempatan pada Bank Indonesia dan bank lain

Penempatan pada Bank Indonesia dan bank lain merupakan penanaman dana dalam bentuk *interbank call money*, Deposito berjangka, Sertifikat deposito, dan Fasilitas Simpanan Bank Indonesia ("FASBI").

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

h. Impairment of non-financial assets (continued)

Impairment losses in respect of non-financial assets recognised in prior year are assessed at each reporting date for any indications that the loss has decreased or no longer exists. An impairment loss, except for goodwill, is reversed if there has been a change in the estimates used to determine the recoverable amount. An impairment loss is reversed only to the extent that the asset's carrying amount does not exceed the carrying amount that would have been determined, net of depreciation or amortisation, if no impairment loss had been recognised.

i. Cash and cash equivalents

Cash includes cash on hand and cash in vault. For the purpose of the statement of cash flows, cash and cash equivalents include cash, current accounts with Bank Indonesia, current accounts with other banks, placements with Bank Indonesia and other banks, and Certificates of Bank Indonesia maturing within 3 (three) months or less from the date of acquisition and are not pledged or restricted.

j. Current accounts with Bank Indonesia and other banks

Current accounts with Bank Indonesia and other banks are classified as financial assets measured at amortised cost. Refer to Note 2d for the accounting policy of financial assets.

Current accounts with Bank Indonesia and other banks are stated at the outstanding balance less allowance for impairment losses.

k. Placements with Bank Indonesia and other banks

Placements with Bank Indonesia and other banks consist of interbank call money, Time deposit, Certificate of deposits, and Bank Indonesia Deposit Facility ("FASBI").

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

l. Efek-efek

Efek-efek yang dimiliki terdiri dari Sertifikat Bank Indonesia ("SBI"), Sekuritas Rupiah Bank Indonesia ("SRBI"), Surat Utang Negara, Surat Berharga Syariah Negara, obligasi korporasi, wesel jangka menengah, unit penyertaan reksadana, dan efek-efek pasar uang dan pasar modal lainnya.

Setelah pengakuan awal, efek-efek diukur sesuai dengan klasifikasinya masing-masing, sebagai diukur pada biaya perolehan diamortisasi atau diukur pada nilai wajar melalui pendapatan komprehensif lain ("FVOCI") atau diukur pada nilai wajar melalui laporan laba rugi ("FVTPL").

1. Diukur pada biaya perolehan diamortisasi

Setelah pengakuan awal, investasi diukur pada biasa perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

2. Diukur pada FVOCI

Setelah pengakuan awal, diukur pada nilai wajar dimana keuntungan dan kerugian yang belum direalisasi atas perubahan nilai wajar akan diakui sebagai penghasilan komprehensif lain. Perubahan pada kerugian kredit ekspektasian diakui laba rugi dan diakumulasi pada ekuitas. Pada saat penghentian pengakuan, akumulasi keuntungan atau kerugian nilai wajar bersih, setelah akumulasi cadangan kerugian penurunan nilai, ditransfer ke laba rugi.

3. Diukur pada FVTPL

Seluruh aset keuangan yang tidak diklasifikasikan sebagai diukur dengan biaya perolehan diamortisasi atau FVOCI sebagaimana ketentuan di atas diukur dengan FVTPL. Instrumen keuangan yang dikelompokkan ke dalam kategori ini diakui pada nilai wajarnya pada saat pengakuan awal; biaya transaksi diakui secara langsung ke dalam laporan laba rugi. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar dan penjualan instrumen keuangan diakui di dalam laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

l. Marketable securities

Marketable securities consist of Certificates of Bank Indonesia ("SBI"), Bank Indonesia Rupiah Securities ("SRBI"), Government Promissory Notes, Government Sharia Bonds, corporate bonds, medium term notes, mutual fund investment units and other money market and capital market securities.

Subsequently accounted for, marketable securities depending on their respective classifications, as either measured at amortised cost or measured at fair value through other comprehensive income ("FVOCI") or measured at fair value through profit or loss ("FVTPL").

1. Measured at amortised cost

Accounted for, investment measured at amortised cost using effective interest rate method.

2. Measured at FVOCI

Accounted for, investment carried at fair value with all unrealised gains and losses arising from changes in fair value recognised in other comprehensive income. Changing in expected credit losses recognised in the profit or loss and are accumulated in equity. On derecognition, the cumulative fair value gains or losses, net of cumulative allowance for impairmen losses, are transferred to the profit or loss.

3. Measured at FVTPL

All financial assets not classified as measured at amortised cost or FVOCI as described above are measured at FVTPL. Financial instruments grouped into this category are recognised at their fair value at initial recognition; transaction costs are recognised directly in the statement of profit or loss. Gains and losses arising from changes in fair value and sale of financial instruments are recognised in the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

m. Pinjaman yang diberikan

Pinjaman yang diberikan adalah penyediaan uang atau tagihan yang dapat disetarakan dengan kas, berdasarkan persetujuan atau kesepakatan pinjam-meminjam dengan debitur, mewajibkan pihak debitur untuk melunasi hutang berikut bunganya setelah jangka waktu tertentu.

Restrukturisasi pinjaman bisa meliputi modifikasi persyaratan pinjaman, konversi pinjaman menjadi saham atau instrumen keuangan lainnya dan/atau kombinasi dari keduanya.

Pinjaman yang direstrukturisasi dan tidak dihentikan pengakuannya disajikan sebesar nilai yang lebih rendah antara nilai tercatat pinjaman pada tanggal restrukturisasi atau proyeksi nilai kini dari penerimaan kas masa depan setelah restrukturisasi. Kerugian akibat selisih antara nilai tercatat pinjaman pada tanggal restrukturisasi dengan nilai tunai penerimaan kas masa depan setelah restrukturisasi diakui sebagai laba/rugi. Setelah restrukturisasi, semua penerimaan kas masa depan yang ditetapkan dalam persyaratan baru dicatat sebagai pengembalian pokok pinjaman yang diberikan dan pendapatan bunga sesuai dengan syarat-syarat restrukturisasi.

n. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli kembali

Efek-efek yang dibeli dengan janji dijual kembali merupakan transaksi dimana Bank membeli aset keuangan dan secara simultan masuk ke dalam perjanjian untuk menjual kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan. Aset yang mendasari tidak diakui dalam laporan keuangan. Setelah pengakuan awal, efek-efek yang dibeli dengan janji dijual kembali diukur pada biaya perolehan diamortisasi. Selisih antara harga beli dan harga jual kembali diakui sebagai pendapatan bunga dengan menggunakan metode suku bunga efektif.

Efek-efek yang dijual dengan janji dibeli kembali merupakan transaksi dimana Bank menjual aset keuangan dan secara simultan masuk ke dalam perjanjian untuk membeli kembali aset (atau aset yang serupa secara substansial) dengan harga tetap di masa depan.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

m. Loans

Loans represent provision of cash or cash equivalents based on agreements with debtor, where debtor required to repay their debts with interest after specified periods.

Loan restructuring may involve a modification of the terms of the loans, conversion of loans into equity or other financial instruments and/or a combination of both.

Restructured loans which are not derecognised, are stated at the lower of carrying value of the loan at the time of restructuring or net present value of the estimate of total future cash receipts after restructuring. Losses arising from any excess of the carrying value of the loan at the time of restructuring over the net present value of the total future cash receipts after restructuring are recognised as profit/loss. Thereafter, all cash receipts under the new terms shall be accounted for as the recovery of principal and interest revenue, in accordance with the restructuring scheme.

n. Securities purchased under resale agreements and securities sold under repurchase agreements

Securities purchased under resale agreements are transactions in which the Bank purchases a financial asset and simultaneously enters into an agreement to resell the asset (or substantially similar asset) at a fixed price on a future date. The underlying asset is not recognised in the financial statements. Subsequent to initial recognition, securities purchased under resale agreements are measured at amortised cost. The difference between purchase and resale price is recognised as interest income using the effective interest method.

Securities sold under repurchase agreements are transactions in which the Bank sold a financial asset and simultaneously enters into an agreement to repurchase the asset (or substantially similar asset) at a fixed price on a future date.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

n. Efek-efek yang dibeli dengan janji dijual kembali dan efek-efek yang dijual dengan janji dibeli kembali (lanjutan)

Efek-efek yang dijual dengan janji untuk dibeli kembali disajikan sebagai liabilitas dalam laporan posisi keuangan sebesar harga beli kembali yang disepakati dikurangi selisih antara harga jual dan harga beli kembali yang disepakati. Selisih antara harga jual dan harga beli kembali yang disepakati tersebut diamortisasi sebagai beban bunga selama jangka waktu sejak efek-efek dijual hingga dibeli kembali.

o. Tagihan dan liabilitas akseptasi

Setelah pengakuan awal, tagihan dan liabilitas akseptasi diukur pada biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

p. Penyertaan saham

(A) Penyertaan saham

Penyertaan saham merupakan investasi jangka panjang pada perusahaan non-publik.

Penyertaan dalam bentuk saham dengan kepemilikan kurang dari 20% yang nilai wajarnya tidak tersedia dan dimaksudkan untuk penyertaan jangka panjang dinyatakan sebesar estimasi terbaik atas nilai wajarnya. Bila terjadi penurunan nilai yang bersifat permanen, nilai tercatatnya dikurangi untuk mengakui penurunan tersebut yang ditentukan untuk setiap investasi secara individu dan kerugiannya dibebankan pada laporan laba rugi tahun berjalan.

(B) Penyertaan saham sementara

Penyertaan saham sementara merupakan penyertaan modal oleh Bank, dalam bentuk saham pada perusahaan debitur untuk mengatasi akibat kegagalan kredit, sebagaimana dimaksud dalam ketentuan peraturan perundang-undangan yang berlaku.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

n. Securities purchased under resale agreements and securities sold under repurchase agreements (continued)

Securities sold under repurchase agreements are presented as liabilities in the statement of financial position at the agreed repurchase price less the difference between the selling price and agreed repurchase price. The difference between the selling price and agreed repurchase price is amortised as interest expense over the period commencing from the selling date to the repurchase date.

o. Acceptances receivable and payable

Subsequent to initial recognition, acceptances receivable and payable are measured at amortised cost using the effective interest method.

p. Investment in shares

(A) Investment in shares

Investment in shares of stock are long-term investments in non-public companies.

Investments in shares of stock where the ownership interest of less than 20% that do not have readily determinable fair values and are intended for long-term investments are stated at their best estimate of fair value. The carrying amount of the investments is written-down to recognise a permanent decline in the value of the individual investments. Any such write-down is charged directly to current year statement of profit or loss.

(B) Temporary investment in shares

Temporary investment in shares is investment in shares by Bank to debtor's company to overcome the credit defaults, in accordance with the prevailing laws.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

p. Penyertaan saham (lanjutan)

(B) Penyertaan saham sementara (lanjutan)

Bank wajib melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau perusahaan tersebut telah memperoleh saldo laba positif pada ekuitasnya.

Penyertaan dalam bentuk saham dengan kepemilikan lebih dari 20%, tanpa ada pengaruh signifikan diklasifikasikan sebagai aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi. Lihat Catatan 2d untuk kebijakan akuntansi atas aset keuangan dalam kelompok yang diukur pada nilai wajar melalui laporan laba rugi.

q. Aset tetap dan penyusutan

Pada tanggal 30 November 2015, Bank melakukan perubahan kebijakan akuntansi atas aset tetap dari model biaya menjadi model revaluasi.

Aset tetap Bank disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan dan cadangan kerugian penurunan nilai untuk aset tetap (jika ada). Penilaian terhadap aset tetap dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi. Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Berdasarkan kebijakan internal Bank, penilaian terhadap aset tetap yang dilakukan oleh penilai independen eksternal dilakukan 3 tahun sekali. Akumulasi penyusutan pada tanggal revaluasi dieliminasi terhadap nilai tercatat bruto aset, dan nilai bersihnya disajikan kembali sebesar nilai revaluasian aset tetap.

Kenaikan nilai tercatat yang timbul dari revaluasi aset tetap dicatat sebagai "Surplus revaluasi aset" dan disajikan sebagai "Penghasilan Komprehensif Lain". Penurunan yang menghapus nilai kenaikan yang sebelumnya atas aset yang sama dibebankan terhadap "Surplus revaluasi aset" sebagai bagian dari laba komprehensif; penurunan lainnya dibebankan pada laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

p. Investment in shares (continued)

(B) Temporary investment in shares (continued)

Bank is obliged to divest temporary investment in shares if the temporary investment in shares have exceeded if maximum period of 5 (five) years or the company have obtained positive retained earnings in equity.

Investments in shares where the ownership above 20%, without any significant influence is classified as financial assets at fair value through profit or loss. Refer to Note 2d for the accounting policy of financial assets at fair value through profit or loss.

q. Fixed assets and depreciation

On November 30, 2015, the Bank changed their accounting policies of fixed assets from cost model to revaluation model.

The Bank's fixed assets are shown at fair value, less subsequent depreciation for fixed assets less accumulated impairment losses (if any). Valuation of fixed assets are performed by external independent valuers with certain qualification. Valuations are performed with sufficient regularity to ensure that the fair value of a revalued asset does not differ materially from its carrying amount. Based on Bank's internal policy, valuation of fixed assets performed by external independent valuers for every 3 years. Any accumulated depreciation at the date of revaluation is eliminated against the gross carrying amount of the asset, and the net amount is restated to the revalued amount of the asset.

Increases in the carrying amount arising on revaluation of fixed assets recorded in "Assets revaluation reserve" and presented as "Other Comprehensive Income". Decreases that offset previous increases of the same asset are debited against "Asset revaluation reserve" as part of other comprehensive income; all other decreases are charged to the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

q. Aset tetap dan penyusutan (lanjutan)

Surplus revaluasi aset tetap dialihkan langsung ke saldo laba ketika aset tersebut dihentikan pengakuannya.

Tanah tidak disusutkan.

Penyusutan aset tetap selain tanah dihitung dengan menggunakan metode garis lurus untuk mengalokasikan nilai setelah revaluasi terhadap nilai sisa sepanjang estimasi masa manfaatnya sebagai berikut:

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

q. Fixed assets and depreciation (continued)

Gain on revaluation of fixed assets are transferred to retained earnings when fixed assets are derecognised.

Land is not depreciated.

Depreciation of fixed assets other than land are calculated based on the straight-line method to allocate their revalued amount to their residual values over their estimated useful lives as follows:

	Masa manfaat/ *Useful lives* Tahun/*Years*	**Penyusutan (persentase)/ *Depreciation (percentage)***	
Gedung kantor	20	5%	*Office buildings*
Kendaraan bermotor	4	25%	*Vehicles*
Mesin dan peralatan	4	25%	*Machinery and equipment*
Perlengkapan dan perabotan kantor	4	25%	*Office furniture and equipment*

Nilai sisa aset, masa manfaat, dan metode penyusutan akan ditinjau dan jika perlu disesuaikan pada setiap akhir periode pelaporan.

The assets residual values, useful lives, and depreciation method are reviewed and adjusted if appropriate at the end of each reporting period.

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat penyesuaian atas masa manfaat dan metode penyusutan.

As of December 31, 2025 and 2024, there are no adjustment on useful life and depreciation method.

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, dengan menggunakan nilai tertinggi antara harga jual bersih dan nilai pakai.

When the carrying amount of an asset is greater than its estimated recoverable amount, it is written down immediately to its recoverable amount, which is determined as the higher of net selling price or value in use.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai wajar dan akumulasi penyusutannya dihapuskan dari laporan keuangan. Keuntungan atau kerugian yang terjadi, diakui sebagai laba/rugi periode terjadinya.

When assets are retired or disposed, their fair value and the related accumulated depreciation are eliminated from the financial statements. The resulting gains or losses are recognised as related period's profit/loss.

Biaya pemeliharaan dan perbaikan dicatat sebagai beban pada saat terjadinya. Pengeluaran yang memperpanjang masa manfaat aset dikapitalisasi dan disusutkan.

Maintenance and repair cost are charged as an expense when incurred. Expenditure that extends the useful life of assets is capitalised and depreciated.

Aset dalam pembangunan merupakan aset yang masih dalam proses renovasi atau pemasangan dan belum siap digunakan, serta dimaksudkan untuk dipergunakan dalam kegiatan usaha. Aset ini dicatat sebesar biaya yang telah dikeluarkan.

Assets under construction consist of assets that are still in progress of renovation or installments and not yet ready for use and intended to be used in business activity. This accounts recorded based on amounts paid.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

r. Aset tak berwujud

Aset tak berwujud yang dimiliki oleh Bank berupa perangkat lunak.

Perangkat lunak, yang bukan merupakan bagian integral dari perangkat keras yang terkait, dicatat sebagai aset tak berwujud dan dinyatakan sebesar nilai tercatat, yaitu sebesar harga perolehan dikurangi dengan akumulasi amortisasi.

Biaya perolehan perangkat lunak terdiri dari seluruh pengeluaran yang dapat dikaitkan langsung dalam persiapan perangkat lunak tersebut sehingga siap digunakan sesuai dengan maksud manajemen.

Pengeluaran setelah perolehan perangkat lunak dapat ditambahkan pada biaya perolehan perangkat lunak atau dikapitalisasi sebagai perangkat lunak hanya jika pengeluaran tersebut menambah manfaat ekonomis masa depan dari perangkat lunak yang bersangkutan sehingga menjadi lebih besar dari standar kinerja yang diperkirakan semula. Pengeluaran yang tidak menambah manfaat ekonomis masa depan dari perangkat lunak diakui sebagai beban pada saat terjadinya.

Perangkat lunak dengan umur manfaat terbatas, diamortisasi dengan menggunakan metode garis lurus selama estimasi masa manfaat ekonomis aset yaitu 4 (empat) tahun.

s. Agunan yang diambil alih

Agunan yang diambil alih (AYDA) adalah aset yang diperoleh Bank, baik melalui pelelangan maupun diluar pelelangan berdasarkan penyerahan secara sukarela oleh pemilik agunan atau berdasarkan kuasa untuk menjual diluar lelang dari pemilik agunan dalam hal debitur tidak memenuhi kewajibannya kepada Bank. AYDA merupakan jaminan yang diambil alih sebagai bagian dari penyelesaian pinjaman yang diberikan. Bank memiliki kebijakan untuk selalu berusaha menjual AYDA untuk menyelesaikan sisa kewajiban debitur.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

r. Intangible assets

Intangible assets held by the Bank is software.

The software, that is not an integral part of the related hardware, is recorded as an intangible asset and is stated at carrying value, which is at cost less accumulated amortisation.

Software acquisition costs consist of all expenditures attributed directly in the preparation of the software so ready to use in accordance with the intent of management.

Expenditures after acquisition software can be added to the cost of software or capitalised as software only if the expenses add future economic benefits of the software so as to be larger than originally expected performance standards. Expenditure that does not add to future economic benefits of the software are recognised as an expense when incurred.

Software with certain useful life, are amortised using straight-line method over the estimated useful life of the assets, which is 4 (four) years.

s. Foreclosed assets

Foreclosed assets represent assets acquired by Bank, both from auction and non-auction based on voluntary transfer by the debtors or based on debtor's approval to sell the collateral where the debtors could not fulfill their obligations to Bank. Foreclosed assets represent collateral acquired in settlement of loans. The Bank has policy to sell foreclosed assets to settle debtor's liabilities.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

s. Agunan yang diambil alih (lanjutan)

AYDA diakui sebesar jumlah yang lebih rendah antara nilai tercatat dengan nilai bersih yang dapat direalisasi *(net realisable value)*, yaitu nilai wajar agunan setelah dikurangi estimasi biaya pelepasan. Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan dalam laporan laba rugi.

Biaya pemeliharaan atas AYDA yang terjadi setelah pengambilalihan atau akuisisi aset dibebankan sebagai laba/rugi pada saat terjadinya. Keuntungan atau kerugian dari penjualan agunan yang diambil alih diakui sebagai laba/rugi tahun berjalan.

t. Biaya dibayar dimuka dan aset lain-lain

Biaya dibayar dimuka merupakan pembayaran kepada pihak lain yang telah dilakukan namun belum merupakan beban pada saat pembayaran dilakukan. Biaya dibayar dimuka akan digunakan untuk aktivitas Bank di masa mendatang. Biaya dibayar dimuka akan diakui sebagai beban pada saat diamortisasi sesuai dengan masa manfaatnya.

Termasuk dalam biaya dibayar dimuka adalah pembiayaan, pengembangan teknologi, promosi dan beban renovasi gedung.

Termasuk di dalam aset lain-lain antara lain adalah uang muka jaminan, uang muka pembelian aset, dan uang muka pengembangan teknologi.

u. Simpanan nasabah dan simpanan dari bank lain

Simpanan nasabah adalah dana yang dipercayakan oleh masyarakat (selain bank) kepada Bank berdasarkan perjanjian penyimpanan dana. Termasuk dalam pos ini adalah giro, tabungan, deposito berjangka, sertifikat deposito dan bentuk lain yang dapat dipersamakan dengan itu.

Simpanan dari bank lain terdiri dari liabilitas terhadap bank lain dalam bentuk giro, *interbank call money*, deposito berjangka, tabungan, dan *deposito on call*.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

s. Foreclosed assets (continued)

Foreclosed assets are recognised at lower amount between carrying value and their net realisable value, which is the fair value of the foreclosed assets less estimated cost of liquidating the foreclosed assets. If there is a permanent decline in value, the carrying amount of foreclosed collaterals in written down to recognise such permanent decline in value. Any such write-down is recognised statement of profit or loss.

Holding costs of foreclosed assets subsequent to the foreclosure or acquisition of the assets are charged as current year profit/loss as incurred. Gains or losses from sale of foreclosed assets are charged as current year profit/loss as incurred.

t. Prepaid expenses and other assets

Prepaid expenses are payments made to other parties but have not been recognised as expense at the time of payment. Prepaid expenses will be used for Bank's activities in the future. Prepaid expenses are recognised as expenses during the amortisation in accordance with the expected period of benefit.

Included in prepaid expenses are financing, technology development, promotion and office building renovation expense.

Included in other assets are amongst others membership deposits, advance for fixed assets purchase, advance for technology development.

u. Deposits from customers and deposits from other banks

Deposits from customers are the funds placed by customers (excluding banks) with Bank based on fund deposit agreements. Included in this account are demand deposits, saving deposits, time deposits, certificates of deposits, and other forms which are similar.

Deposits from other banks represent liabilities to banks in the form of demand deposits, inter-bank call money, time deposits, saving accounts, and deposits on call.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

u. Simpanan nasabah dan simpanan dari bank lain (lanjutan)

Simpanan dari nasabah dan dari bank lain diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

v. Efek-efek yang diterbitkan

Efek-efek yang diterbitkan adalah obligasi yang diterbitkan dan diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atau liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

Biaya transaksi yang timbul sehubungan dengan penerbitan efek-efek dikurangkan dari hasil penerbitan efek-efek bersangkutan. Selisih antara hasil emisi bersih dengan nilai nominal obligasi diakui sebagai diskonto yang diamortisasi menggunakan metode suku bunga efektif selama umur obligasi.

w. Pinjaman yang diterima

Pada pengukuran awal pinjaman diterima dan pinjaman subordinasi disajikan sebesar nilai wajar dikurangi dengan biaya transaksi yang dapat diatribusikan langsung dengan perolehan/penerbitan pinjaman dan obligasi subordinasi.

Pinjaman yang diterima dan pinjaman subordinasi diklasifikasikan sebagai liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Lihat Catatan 2d untuk kebijakan akuntansi atas liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi.

x. Transaksi Sewa

Pada tanggal permulaan kontrak, Bank menilai apakah kontrak merupakan atau mengandung sewa. Suatu kontrak merupakan atau mengandung sewa jika kontrak tersebut memberikan hak untuk mengendalikan penggunaan aset identifikasian selama suatu jangka waktu untuk dipertukarkan dengan imbalan. Bank dapat memilih untuk tidak mengakui aset hak-guna dan liabilitas sewa untuk:

- Sewa jangka pendek; dan
- Sewa yang aset pendasarnya bernilai-rendah.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

u. Deposits from customers and deposits from other banks (continued)

Deposits from customers and other banks are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.

v. Marketable Securities issued

Marketable securities issued is the issuance of bond which is classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities at amortised cost.

Transaction cost in relation with the marketable securities issued is deducted from the related marketable securities issued. Any difference between net proceed of bond issuance and nominal of bond is recognised as discount and will be amortised using effective interest rate during bond's period.

w. Borrowings

Borrowings and subordinated loans are initially presented at fair value less directly attributable transaction costs to the acquisition or issuance of subordinated loans and bonds.

Borrowings and subordinated loans are classified as financial liabilities measured at amortised cost. Refer to Note 2d for the accounting policy for financial liabilities measured at amortised cost.

x. Leases Transaction

At the inception of a contract, the Bank assesses whether the contract is or contains a leases. A contract is or contains a leases if the contract conveys the right to control the use of an identified assets for a period of time in exchange for consideration. The Bank can choose not to recognise the right-of-use asset and lease liabilities for:

- *Short-term lease; and*
- *Low value asset.*

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Transaksi Sewa (lanjutan)

Untuk menilai apakah kontrak memberikan hak untuk mengendalikan penggunaan aset identifikasian, Bank harus menilai apakah:

- Bank memiliki hak untuk mendapatkan secara substansial seluruh manfaat ekonomi dari penggunaan aset identifikasian; dan
- Bank memiliki hak untuk mengarahkan penggunaan aset identifikasian. Bank memiliki hak ini ketika Bank memiliki hak untuk pengambilan keputusan yang relevan tentang bagaimana dan untuk tujuan apa aset digunakan telah ditentukan sebelumnya:
  1. Bank memiliki hak untuk mengoperasikan aset; dan
  2. Bank telah mendesain aset dengan cara menetapkan sebelumnya bagaimana dan untuk tujuan apa aset akan digunakan selama periode penggunaan.

Pada tanggal permulaan sewa, Bank mengakui aset hak-guna dan liabilitas sewa. Aset hak-guna diukur pada biaya perolehan, dimana meliputi jumlah pengukuran awal liabilitas sewa yang disesuaikan dengan pembayaran sewa yang dilakukan pada atau sebelum tanggal permulaan, ditambah dengan biaya langsung awal yang dikeluarkan. Aset hak-guna diamortisasi dengan menggunakan metode garis lurus sepanjang jangka waktu sewa.

Liabilitas sewa diukur pada nilai kini pembayaran sewa yang belum dibayar pada tanggal permulaan, didiskontokan dengan menggunakan suku bunga implisit dalam sewa atau jika suku bunga tersebut tidak dapat ditentukan, maka menggunakan suku bunga pinjaman inkremental. Pada umumnya, Bank menggunakan suku bunga pinjaman inkremental sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

x. Leases Transaction (continued)

To assess whether a contract conveys the right to control the use of an identified asset, the Bank shall assess whether:

- *The Bank has the right to obtain substantially all the economic benefit from use of the asset throughout the period of use; and*
- *The Bank has the right to direct the use of the asset. The Bank has described when it has a decision-making rights that are the most relevant to changing how and for what purpose the asset is used are predetermined:*
  1. *The Bank has the right to operate the asset; and*
  2. *The Bank has designed the asset in a way that predetermine how and for what purpose it will be used.*

The Bank recognises a right-of-use asset and a leases liability at the leases commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the leases liability adjusted for any leases payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use asset is amortised over the straight-line method throughout the lease term.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that right cannot be readily determined, using incremental borrowing rate. Generally, the Bank uses its incremental borrowing rate as a discount rate.

Each leases payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the leases period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

x. Transaksi Sewa (lanjutan)

Jika sewa mengalihkan kepemilikan aset pendasar kepada Bank pada akhir masa sewa atau jika biaya perolehan aset hak-guna merefleksikan Bank akan mengeksekusi opsi beli, maka Bank menyusutkan aset hak-guna dari tanggal permulaan hingga akhir umur manfaat aset pendasar. Jika tidak, maka Bank menyusutkan aset hak-guna dari tanggal permulaan hingga tanggal yang lebih awal antara akhir umur manfaat aset hak-guna atau akhir masa sewa.

Bank menganalisa fakta dan keadaan untuk masing-masing jenis hak atas tanah dalam menentukan akuntansi untuk masing-masing hak atas tanah tersebut sehingga dapat merepresentasikan dengan tepat suatu kejadian atau transaksi ekonomik yang mendasarinya. Jika hak atas tanah tersebut tidak mengalihkan pengendalian atas aset pendasar kepada Bank, melainkan mengalihkan hak untuk menggunakan aset pendasar, Bank menerapkan perlakuan akuntansi atas transaksi tersebut sebagai sewa berdasarkan PSAK 116, "Sewa", kecuali jika hak atas tanah secara substansi menyerupai pembelian tanah, maka Bank menerapkan PSAK 216, "Aset tetap".

Modifikasi sewa

Bank mencatat modifikasi sewa sebagai sewa terpisah jika:

- modifikasi meningkatkan ruang lingkup sewa dengan menambahkan hak untuk menggunakan satu aset pendasar atau lebih;
- imbalan sewa meningkat sebesar jumlah yang setara dengan harga tersendiri untuk peningkatan dalam ruang lingkup dan penyesuaian yang tepat pada harga tersendiri tersebut untuk merefleksikan kondisi kontrak tertentu.

y. Pendapatan dan beban bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan dengan *interest bearing* dicatat dalam pendapatan bunga dan beban bunga menggunakan metode suku bunga efektif.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

x. Leases Transaction (continued)

If the leases transfers ownership of the underlying asset to the Bank by the end of the leases term or if the cost of the right-of-use asset reflects that the Bank will exercise a purchase option, the Bank depreciates the right-of-use asset from the commencement date to the end of the useful life of the underlying asset. Otherwise, the Bank depreciates the right-of-use asset from the commencement date to the earlier of the end of the useful life of the right-of-use asset or the end of the leases term.

The Bank analyses the facts and circumstances for each type of landrights in determining the accounting for each of these land rights so that it can accurately represent an underlying economic event or transaction. If the landrights do not transfer control of the underlying assets to the Bank, but gives the rights to use the underlying assets, the Bank applies the accounting treatment of these transactions as leases under SFAS 116, "Lease", except if landrights substantially similar to land purchases, the Bank applies SFAS 216, "Property, plant and equipment".

Leases modification

The Bank account for a leases modification as a separate leases if both:

- *the modification increases the scope of the leases by adding the right to use one or more underlying assets;*
- *the consideration for the leases increases by an amount commensurate with the stand-alone price for the increase in scope and any appropriate adjustments to that stand-alone price to reflect the circumstances of the particular contract.*

y. Interest income and expense

Interest income and expense for all interest bearing financial instruments are recorded within interest income and interest expense using the effective interest rate method.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

y. Pendapatan dan beban bunga (lanjutan)

Metode suku bunga efektif adalah metode yang digunakan untuk menghitung biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan dan metode untuk mengalokasikan pendapatan bunga atau beban bunga selama periode yang relevan.

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atau penerimaan kas di masa datang selama perkiraan umur dari instrumen keuangan, atau bilamana tepat, digunakan periode yang lebih singkat untuk memperoleh nilai tercatat bersih dari aset keuangan atau liabilitas keuangan. Pada saat menghitung suku bunga efektif, Bank mengestimasi arus kas dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut, namun tidak mempertimbangkan kerugian kredit di masa datang. Perhitungan ini mencakup seluruh komisi, provisi, dan bentuk lain yang dibayarkan atau diterima oleh para pihak dalam kontrak yang merupakan bagian tak terpisahkan dari suku bunga efektif, biaya transaksi, dan seluruh premi atau diskon lainnya.

Jika aset keuangan atau kelompok aset keuangan serupa telah diturunkan nilainya sebagai akibat kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui atas bagian aset keuangan yang tidak mengalami penurunan nilai, berdasarkan suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung kerugian penurunan nilai.

Pendapatan bunga atas pinjaman yang diberikan atau aset produktif lainnya yang diklasifikasikan sebagai bermasalah diakui pada saat pendapatan tersebut diterima. Pada saat aset keuangan diklasifikasikan sebagai bermasalah, bunga yang telah diakui tetapi belum ditagih akan dibatalkan pengakuannya. Selanjutnya bunga yang dibatalkan tersebut diakui sebagai tagihan kontinjensi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

y. Interest income and expense (continued)

The effective interest rate method is a method of calculating the amortised cost of a financial asset or a financial liability and method of allocating the interest income or interest expense over the relevant period.

The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, Bank estimates cash flows considering all contractual terms of the financial instrument, but does not consider future credit losses. The calculation includes all fees, commissions, and other fees paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts.

Once a financial asset or a bank of similar financial assets has been written down as a result of an impairment loss, interest income is recognised on the unimpaired portion using the rate of interest used to discount the future cash flows for the purpose of measuring the impairment loss.

Interest income on loans or other earning assets classified as non-performing is recognised at the time the interest is received. When a financial asset is classified as non-performing, any interest income previously recognised but not yet collected is reversed against interest income. The reversed interest income is recognised as a contingent receivable.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

z. Pendapatan provisi dan komisi

Provisi dan komisi yang berkaitan langsung dengan kegiatan pemberian pinjaman diakui sebagai bagian/(pengurang) dari biaya perolehan pinjaman dan akan diakui sebagai pendapatan bunga dengan cara diamortisasi berdasarkan metode suku bunga efektif.

Pendapatan provisi dan komisi yang tidak berkaitan dengan kegiatan pemberian pinjaman atas suatu jangka waktu diakui sebagai pendapatan pada saat terjadinya transaksi sebagai pendapatan operasional lainnya.

aa. Pendapatan dan beban operasional lainnya

Beban tenaga kerja

Beban tenaga kerja meliputi beban berupa gaji karyawan, bonus, lembur dan tunjangan.

Beban umum dan administrasi

Beban umum dan administrasi merupakan beban yang timbul sehubungan dengan aktivitas kantor dan operasional Bank.

Seluruh pendapatan dan beban yang terjadi dibebankan sebagai laba/rugi pada saat terjadinya.

ab. Perpajakan

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang langsung diakui di pendapatan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam pendapatan komprehensif lain atau ekuitas.

Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan (“SPT”) sehubungan dengan situasi dimana aturan pajak yang berbeda membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

z. Fees and commissions income

Fees and commissions income directly related to lending activities, are recognised as a part/(deduction) of lending cost and will be recognised as interest income by amortising the carrying value of loan with effective interest rate method.

Fees and commissions income which are not related to lending activities on a specific period are recognised as income incurred at the transaction date as other operating income.

aa. Other operating income and expenses

Personnel expenses

Personnel expenses include expenses related with salaries for employees, bonuses, overtime and allowances.

General and administrative expenses

General and administrative expenses represent expenses related to office activities and Bank operational activities.

All of these income and expenses are recorded as profit/loss when incurred.

ab. Taxation

The tax expense comprises of current and deferred tax. Tax is recognised in the profit or loss, except to the extent that it relates to items recognised directly in other comprehensive income or in equity. In this case, the tax is also recognised in other comprehensive income or in equity, respectively.

Management periodically evaluates positions takes in tax return with respect to situations in which applicable tax regulation is subject to interpretation. It establishes provision where appropriate, on the basis of amounts expected to be paid to the tax authorities.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ab. Perpajakan (lanjutan)

Pajak penghasilan tangguhan disajikan dengan menggunakan metode liabilitas. Pajak penghasilan tangguhan timbul akibat perbedaan temporer antara aset dan liabilitas menurut ketentuan-ketentuan pajak dengan nilai tercatat aset dan liabilitas dalam laporan keuangan. Tarif pajak yang berlaku atau yang secara substansial telah berlaku digunakan dalam menentukan besarnya jumlah pajak penghasilan tangguhan.

Aset pajak tangguhan diakui apabila terdapat kemungkinan besar bahwa jumlah laba fiskal di masa mendatang akan memadai untuk mengkompensasi perbedaan temporer yang menimbulkan aset pajak tangguhan tersebut. Aset dan liabilitas pajak penghasilan tangguhan dapat saling hapus apabila terdapat hak yang berkekuatan hukum untuk melakukan saling hapus antara aset pajak kini dengan liabilitas pajak kini dan apabila aset dan pajak penghasilan tangguhan dikenakan oleh otoritas perpajakan yang sama dan adanya niat untuk melakukan penyelesaian saldo secara bersih.

Taksiran pajak penghasilan Bank dihitung untuk masing-masing perusahaan sebagai badan hukum terpisah. Aset pajak kini dan liabilitas pajak kini untuk badan hukum yang berbeda tidak disalinghapuskan dalam laporan keuangan.

ac. Imbalan kerja

Imbalan kerja jangka pendek

Imbalan kerja jangka pendek diakui pada saat terutang kepada karyawan.

Liabilitas imbalan kerja karyawan

Bank memiliki program pensiun sesuai dengan peraturan dan perundang-undangan yang berhubungan dengan ketenagakerjaan atau kebijakan yang ditetapkan oleh Bank. Program ini pada umumnya didanai melalui pembayaran kepada pengelola dana pensiun yang besarnya ditentukan dalam perhitungan aktuarial yang dilakukan secara berkala.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ab. Taxation (continued)

Deferred income tax is provided using the liability method. Deferred income tax on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the financial statements. Currently enacted or substantially enacted tax rates are used in the determination of deferred income tax.

Deferred tax assets are recognised to the extent that it is probable that future taxable profit will be available against which the temporary differences can be utilised. Deferred Income tax assets and liabilities are offset when there is a legally enforceable right to offset current tax assets against current tax liabilities and when deferred income taxes assets and liabilities relate to income taxes levied by the same taxation authority where tax is an intention to settle the balance on a net basis.

The estimated corporate income tax of Bank is calculated for each company as a separate legal entity. Current tax assets and current tax liabilities for different legal entities cannot be net-off in the financial statements.

ac. Employee benefits

Short term employee benefits

Short term employee benefits are recognised when they are accrued to the employees.

Employee benefits obligation

The Bank have pension scheme in accordance with prevailing labor-related laws and regulations of Bank's policies. The scheme is generally funded through payments to trustee-administered funds as determined by periodic actuarial calculations.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ac. Imbalan kerja (lanjutan)

Liabilitas imbalan kerja karyawan (lanjutan)

Bank harus menyediakan program pensiun dengan jumlah minimal tertentu sesuai dengan UU Cipta Kerja No. 11/2020. Karena Undang-Undang Ketenagakerjaan menentukan rumus tertentu untuk menghitung jumlah minimal imbalan pensiun, maka pada dasarnya program pensiun berdasarkan Undang-Undang Ketenagakerjaan adalah program manfaat pasti. Program pensiun manfaat pasti adalah program pensiun yang menentukan jumlah imbalan pensiun yang akan diberikan, biasanya didasarkan pada satu faktor atau lebih seperti usia, masa kerja atau jumlah kompensasi.

Liabilitas diakui pada laporan posisi keuangan sebesar nilai kini kewajiban imbalan pasti pada akhir periode pelaporan dikurangi nilai wajar aset program. Kewajiban imbalan pasti dihitung setiap tahun oleh aktuaris yang independen dengan menggunakan metode *projected unit credit*. Nilai kini kewajiban imbalan pasti ditentukan dengan mendiskontokan arus kas keluar yang diestimasi dengan menggunakan tingkat bunga Obligasi Pemerintah (dikarenakan saat ini tidak ada pasar aktif untuk obligasi perusahaan yang berkualitas tinggi) yang didenominasikan dalam Rupiah dimana imbalan akan dibayarkan dan memiliki jangka waktu jatuh tempo mendekati jangka waktu kewajiban pensiun.

Keuntungan dan kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial langsung diakui seluruhnya melalui pendapatan komprehensif lainnya pada saat terjadinya.

Biaya jasa lalu diakui segera dalam laporan laba rugi. Keuntungan dan kerugian dari kurtailmen atau penyelesaian program manfaat pasti diakui di laba rugi ketika kurtailmen atau penyelesaian tersebut terjadi.

Pesangon pemutusan kontrak terhutang ketika karyawan diberhentikan sebelum usia pensiun normal.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ac. Employee benefits (continued)

Employee benefits obligation (continued)

The Bank are required to provide a minimum amount of pension benefits in accordance with Job Creation Law Art No.11/2020. Since the Labor Law sets the formula for determining the minimum amount of benefits, in substance pension plans under the Labor Law represent defined benefit plans. A defined benefit plan is a pension plan that defines an amount of pension benefit to be provided, usually as a function of one or more factors such as age, years of service or total compensation.

The liability recognised in the statement of financial position is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method. The present value of the defined benefit obligation is determined by discounting the estimated future cash outflows using interest rates of Government Bonds (considering currently there is no active market for high-quality corporate bonds) that are denominated in Rupiah in which the benefits will be paid, and that have terms to maturity approximating to the terms of the related pension obligation.

Actuarial gains and losses arising from experience adjustments and changes in actuarial assumptions charged or credited to equity in other comprehensive income in the period in which they arise.

Past-service costs are recognised immediately in the statements of profit or loss. Gains or losses on the curtailment or settlement of a defined benefit plan are recognised in the statement of profit or loss when the curtailment or settlement occurs.

Termination benefits are payable whenever an employee's employment is terminated before the normal retirement age.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ac. Imbalan kerja (lanjutan)

Liabilitas imbalan kerja karyawan (lanjutan)

Bank mengakui pesangon pemutusan kontrak kerja ketika Bank menunjukkan komitmennya untuk memutuskan hubungan kerja dengan karyawan berdasarkan suatu rencana formal terperinci yang kecil kemungkinannya untuk dibatalkan. Pesangon yang akan dibayarkan dalam waktu lebih dari 12 (dua belas) bulan setelah tanggal laporan posisi keuangan didiskontokan untuk mencerminkan nilai kini.

ad. Laba per saham

Laba per saham dasar dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham biasa yang beredar pada periode yang bersangkutan.

Laba per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

ae. Penjabaran mata uang asing

Laporan keuangan disajikan dalam mata uang Rupiah, yang merupakan mata uang fungsional dan penyajian Bank. Transaksi dalam mata uang asing dijabarkan ke mata uang Rupiah dengan menggunakan kurs yang berlaku pada tanggal transaksi tersebut. Pada setiap tanggal pelaporan, aset dan liabilitas moneter dalam mata uang asing dijabarkan ke mata uang Rupiah dengan kurs penutupan Bank Indonesia pada pukul 16:00 Waktu Indonesia Barat yang berlaku pada tanggal pelaporan.

Keuntungan dan kerugian selisih kurs yang timbul dari transaksi dalam mata uang asing dan penjabaran aset dan kewajiban moneter dalam mata uang asing, diakui dalam laporan laba rugi.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ac. Employee benefits (continued)

Employee benefits obligation (continued)

The Bank recognise termination benefits when it is demonstrably committed to terminate the employment of current employees according to a detailed formal plan which has small probability to withdraw. Benefits, due more than 12 (twelve) months after statement of financial position's date are discounted to present value.

ad. Earnings per share

Basic earnings per share is computed by dividing net income with the weighted average number of common shares outstanding during the period.

Diluted earnings per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

ae. Foreign currency translation

The financial statements are presented in Rupiah, which is the functional and presentation currency of the Bank. Transactions denominated in a foreign currency are converted into Rupiah at the exchange rate prevailing at the date of the transaction. As at each reporting date, monetary assets and liabilities in foreign currencies are translated into Rupiah using the Bank Indonesia closing exchange rate at 16:00 Western Indonesian Time prevailing at reporting date.

Exchange gains and losses arising on transactions in foreign currencies and on the translation of foreign currency monetary assets and liabilities are recognised in the statement of profit or loss.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ae. Penjabaran mata uang asing (lanjutan)

Berikut ini adalah kurs mata uang asing utama yang digunakan pada tanggal 31 Desember 2025 dan 2024 yang menggunakan kurs tengah Reuters pukul 16:00 Waktu Indonesia Barat (nilai penuh):

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ae. Foreign currency translation (continued)

Below are the major exchange rates used as of December 31, 2025 and 2024 using the Reuter's middle rates at 16:00 Western Indonesian Time (full amount):

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Poundsterling Inggris	22.440	20.219	*Great Britain Poundsterling*
Franc Swiss	21.026	17.815	*Swiss Franc*
Euro Eropa	19.571	16.758	*European Euro*
Dolar Amerika Serikat	16.675	16.095	*United States Dollar*
Dolar Singapura	12.965	11.845	*Singapore Dollar*
Dolar Kanada	12.168	11.202	*Canadian Dollar*
Dolar Australia	11.152	10.014	*Australian Dollar*
Dolar New Zealand	9.626	9.068	*New Zealand Dollar*
Riyal Arab Saudi	4.447	4.284	*Saudi Riyal*
Ringgit Malaysia	4.108	3.598	*Malaysian Ringgit*
Yuan China	2.385	2.205	*Chinese Yuan*
Dolar Hongkong	2.142	2.073	*Hongkong Dollar*
Dolar Taiwan	531	491	*New Taiwan Dollar*
Baht Thailand	529	470	*Thailand Baht*
Yen Jepang	107	103	*Japanese Yen*
Won Korea	12	11	*Korean Won*

af. Transaksi dengan pihak berelasi

Bank melakukan transaksi dengan pihak berelasi. Sesuai dengan PSAK 224 tentang "Pengungkapan Pihak-pihak yang Berelasi", yang dimaksud dengan pihak yang berelasi adalah orang atau entitas yang berelasi dengan entitas pelapor sebagai berikut:

a. Orang atau anggota keluarga terdekatnya berelasi dengan entitas pelapor jika orang tersebut:
   i. memiliki pengendalian atau pengendalian bersama terhadap entitas pelapor;
   ii. memiliki pengaruh signifikan terhadap entitas pelapor; atau
   iii. personal manajemen kunci entitas pelapor atau entitas induk pelapor.

af. Transactions with related parties

The Bank has transactions with related parties. In accordance with SFAS 224 regarding "Related Party Disclosure", the meaning of a related party is a person or entity that is related to a reporting entity as follow:

a. A person or a close member of that person's family is related to a reporting entity if:
   i. has control or joint control over the reporting entity;
   ii. has significant influence over the reporting entity; or
   iii. is member of the key management personnel of the reporting entity or a parent of the reporting entity.

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

af. Transaksi dengan pihak berelasi (lanjutan)

Bank melakukan transaksi dengan pihak berelasi. Sesuai dengan PSAK 224 tentang "Pengungkapan Pihak-pihak yang Berelasi", yang dimaksud dengan pihak yang berelasi adalah orang atau entitas yang berelasi dengan entitas pelapor sebagai berikut: (lanjutan)

b. Suatu entitas berelasi dengan entitas pelapor jika memenuhi hal-hal sebagai berikut:
   i. entitas dan entitas pelapor adalah anggota dari kelompok usaha yang sama (artinya entitas induk, entitas anak, dan entitas anak berikutnya terkait dengan entitas lain);
   ii. suatu entitas adalah entitas asosiasi atau ventura bersama bagi entitas lain (atau entitas asosiasi atau ventura bersama yang merupakan anggota suatu kelompok usaha, di mana entitas lain tersebut adalah anggotanya);
   iii. kedua entitas tersebut adalah ventura bersama dari pihak ketiga yang sama;
   iv. suatu entitas adalah ventura bersama dari entitas ketiga dan entitas yang lain adalah entitas asosiasi dari entitas ketiga;
   v. entitas tersebut adalah suatu program imbalan pasca kerja untuk imbalan kerja dari suatu entitas pelapor atau entitas yang terkait dengan entitas pelapor;
   vi. entitas yang dikendalikan atau dikendalikan bersama oleh orang yang diidentifikasi dalam butir (a); atau
   vii. orang yang diidentifikasi, dalam butir (a) (i) memiliki pengaruh signifikan terhadap entitas atau anggota manajemen kunci entitas (atau entitas induk dari entitas).

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

af. Transactions with related parties (continued)

The Bank has transactions with related parties. In accordance with SFAS 224 regarding "Related Party Disclosure", the meaning of a related party is a person or entity that is related to a reporting entity as follow: (continued)

b. An entity is related to a reporting entity if any of the following conditions applies:
   i. the entity and the reporting entity are member of the same the company (which means that each parent, subsidiary, and fellow subsidiary is related to the others);
   ii. one entity is an associate or joint venture of the other entity (or an associate or joint venture of member of a company of which the other entity is a member);
   iii. both entities are joint ventures of the same third party;
   iv. one entity is a joint venture of a third entity and the other entity is an associate of the third entity;
   v. the entity is a post-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity;
   vi. the entity controlled or jointly controlled by a person identified in (a); or
   vii. a person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

2. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

ag. Pelaporan segmen

Sebuah segmen operasi adalah suatu komponen dari entitas:

a. yang terlibat dalam aktivitas bisnis yang memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban yang terkait dengan transaksi dengan komponen lain dari entitas yang sama);
b. hasil operasinya dikaji ulang secara reguler oleh kepala operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
c. tersedia informasi keuangan yang dapat dipisahkan.

Bank menyajikan segmen operasi berdasarkan informasi yang disiapkan secara internal untuk pengambil keputusan operasional. Berdasarkan PSAK 108, sebuah segmen usaha adalah sekelompok aset dan operasi yang menyediakan barang atau jasa yang memiliki risiko serta tingkat pengembalian yang berbeda dengan segmen usaha lainnya.

Segmen geografis adalah komponen Bank yang dapat dibedakan dalam menghasilkan jasa pada lingkungan (wilayah) ekonomi tertentu dan komponen itu memiliki risiko dan imbalan yang berbeda dengan risiko dan imbalan pada komponen yang beroperasi pada lingkungan (wilayah) ekonomi lain. Bank melaporkan segmen geografis berdasarkan daerah Jadetabek, Jawa Barat, Jawa Tengah dan Jawa Timur dan Luar Jawa.

2. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

ag. Segment reporting

An operating segment is a component of entity which:

a. involves with business activities to generate income and expenses (include income and expenses relating to the transactions with other components with the same entity);
b. operations result is observed regularly by chief decision maker to make decisions regarding the allocation of resources and to evaluate the works; and
c. separated financial information is available.

Bank presents operating segments based on the information that internally is provided to the chief operating decision maker. Under SFAS 108, a business segment is a bank of assets and operations engaged in providing products or services that are subject to risks and returns that are difference from those of other business segments.

A geographical segment is a distinguishable component of the Bank that is engaged in providing services within a particular economic environment and that is subject to risks and returns that are different from those operating in other economic environments. The Bank report geographical segment information based on Jadetabek, West Java, Central and East Java and Non Java.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING

Beberapa estimasi dan asumsi dibuat dalam rangka penyusunan laporan keuangan dimana dibutuhkan pertimbangan manajemen dalam menentukan metodologi yang tepat untuk penilaian aset dan liabilitas.

Manajemen membuat estimasi dan asumsi yang berimplikasi pada pelaporan nilai aset dan liabilitas atas tahun keuangan satu tahun kedepan. Semua estimasi dan asumsi yang diharuskan oleh PSAK adalah estimasi terbaik yang didasarkan standar yang berlaku. Estimasi dan pertimbangan dievaluasi secara terus menerus dan berdasarkan pengalaman masa lalu dan faktor-faktor lain termasuk harapan atas kejadian yang akan datang.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS

Certain estimates and assumption are made in the presentation of the financial statements. These often require management judgement in determining the appropriate methodology for valuation of assets and liabilities.

Management makes estimates and assumptions that affect the reported amounts of assets and liabilities within the next financial year. All estimates and assumptions required in conformity with SFAS are best estimates undertaken in accordance with the applicable standard. Estimates and judgements are evaluated on a continuous basis, and are based on past experience and other factors, including expectations with regard to future events.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Walaupun estimasi dan asumsi ini dibuat berdasarkan pengetahuan terbaik manajemen atas kejadian dan tindakan saat ini, hasil yang timbul mungkin berbeda dengan estimasi dan asumsi semula.

Cadangan kerugian penurunan nilai aset keuangan

Sesuai dengan PSAK 109, pengukuran cadangan kerugian penurunan nilai aset keuangan yang diukur pada biaya perolehan diamortisasi dan diukur pada nilai wajar melalui penghasilan komprehensif lain membutuhkan penggunaan model yang kompleks dan asumsi signifikan terkait *future economic conditions* dan *credit behavior.*

Estimasi signifikan dibutuhkan dalam menerapkan perhitungan cadangan kerugian penurunan nilai berdasarkan PSAK 109, antara lain:

- Penentuan kriteria *significant increase in Credit Risk*:
- Menentukan model yang tepat dan asumsi untuk perhitungan cadangan kerugian penurunan nilai;
- Menentukan jumlah dan pembebanan relatif atas skenario *forward-looking* untuk masing-masing segmen/produk;
- Menentukan segmentasi aset keuangan yang sejenis untuk perhitungan cadangan kerugian penurunan nilai;
- Estimasi arus kas debitur dalam perhitungan individual *impairment*.

Lihat Catatan 2g untuk kebijakan akuntansi atas penurunan nilai aset keuangan.

Agunan yang diambil alih

Agunan yang diambil alih diukur sebesar nilai yang lebih rendah antara nilai tercatat dan nilai bersih yang dapat direalisasi. Nilai bersih yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai bersih yang dapat direalisasi dari agunan yang diambil alih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset non keuangan.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Although these estimates and assumption are based on management's best knowledge of current events and activities, actual result may differ from those estimates and assumption.

Allowance for impairment losses of financial assets

According to SFAS 109, the measurement of the expected credit loss allowance for financial assets measured at amortised cost and at fair value through other comprehensive income is an area that requires the use of complex models and significant assumptions about future economic conditions and credit behavior.

Significant estimates are required in applying the SFAS 109 requirements for measuring allowance for impairment losses, such as:

- *Determining criteria for significant increase in Credit Risk;*
- *Choosing appropriate models and assumptions for the measurement of allowance for impairment losses;*
- *Establishing the number and relative weightings of forward-looking scenarios for each type of segment/product;*
- *Establishing groups of similar financial assets for the purposes of measuring allowance for impairment losses;*
- *Estimate debtor's cash flow in the calculation of individual impairment.*

Refer to Note 2g for accounting policy on impairment of financial assets.

Foreclosed assets

Foreclosed assets are stated at lower amount of carrying amount and net realisable value.Net realisable value is the fair value of the foreclosed assets less the estimated costs to sell the assets. The excess of loan receivable over the net realisable value of the foreclosed assets is charged to allowance for impairment losses on non financial assets.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Agunan yang diambil alih (lanjutan)

Kondisi agunan yang diambil alih dievaluasi secara individu berdasarkan estimasi terbaik manajemen atas nilai kini arus kas yang diharapkan akan diterima. Dalam mengestimasi nilai bersih yang dapat direalisasi tersebut, manajemen membuat pertimbangan berdasarkan nilai realisasi bersih dari setiap agunan berdasarkan hasil penilaian dari penilai independen dan estimasi waktu dan arus kas yang diterima dari penjualan aset tersebut. Setiap aset yang mengalami penurunan nilai dinilai sesuai dengan kondisi, dan strategi penyelesaian serta estimasi arus kas yang diperkirakan dapat diterima.

Imbalan kerja karyawan

Nilai kini atas imbalan kerja karyawan tergantung dari banyaknya faktor yang dipertimbangkan oleh aktuaris berdasarkan beberapa asumsi. Perubahan atas asumsi-asumsi tersebut akan mempengaruhi nilai tercatat atas imbalan kerja karyawan.

Asumsi yang digunakan dalam menentukan biaya atau pendapatan untuk imbalan kerja termasuk tingkat diskonto. Bank menentukan tingkat diskonto yang tepat pada setiap akhir tahun. Ini merupakan tingkat suku bunga yang digunakan untuk menentukan nilai kini atas arus kas masa depan yang diestimasi akan digunakan untuk membayar imbalan kerja. Dalam menentukan tingkat diskonto yang tepat, Bank mempertimbangkan tingkat suku bunga atas Obligasi Pemerintah yang mempunyai jatuh tempo yang menyerupai jangka waktu imbalan kerja karyawan.

Asumsi kunci liabilitas pensiun lainnya sebagian ditentukan berdasarkan kondisi pasar saat ini (Catatan 27).

Penentuan nilai wajar

Dalam menentukan nilai wajar atas aset keuangan dan liabilitas keuangan dimana tidak terdapat harga pasar yang dapat diobservasi, Bank harus menggunakan teknik penilaian seperti dijelaskan pada Catatan 2d.

Informasi mengenai penentuan nilai wajar dari instrumen keuangan diungkapkan pada Catatan 48.

Dalam mengukur nilai wajar atas aset dan liabilitas non-keuangan, Bank menggunakan data pasar yang dapat diobservasi jika memungkinkan.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Foreclosed assets (continued)

The specific condition of foreclosed assets is individually evaluated based on management's best estimate of the present value of the expected cash flows to be received. In estimating these cash flows, management makes judgements about the net realisable value of each foreclosed asset based the result of independent appraisal and estimated time and cash received from selling the foreclosed assets. Each impaired assets will be measured based on its merits, and the workout strategy and estimated cash flows considered recoverable.

Employee benefit

The present value of the employee benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions. Any changes in these assumptions will impact the carrying amount of employee benefit obligations.

The assumptions used in determining the net cost (income) for employee benefits include the discount rate. The Bank determines the appropriate discount rate at the end of each year. This is the interest rate that should be used to determine the present value of estimated future cash outflows expected to be required to settle the pension obligations. In determining the appropriate discount rate, the Bank considers the interest rates of Government Bonds that have terms to maturity approximating the terms of the related employee benefit liability.

Other key assumptions for pension obligations are partly based on current market conditions (Note 27).

Determining fair values

The determining of fair value for financial assets and financial liabilities for which there is no observable market price requires the Bank must use of valuation techniques as described in Note 2d.

Information about the determination of fair value of financial instruments is disclosed in Note 48.

When measuring the fair value for non-financial assets and liabilities, the Bank uses observable market data to extent possible.

3. PENGGUNAAN ESTIMASI DAN PERTIMBANGAN AKUNTANSI YANG PENTING (lanjutan)

Perpajakan

Pertimbangan signifikan dilakukan dalam menentukan provisi atas pajak penghasilan badan dan pajak lainnya. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti dalam kegiatan usaha normal. Bank mengakui liabilitas pajak penghasilan badan dan pajak lainnya berdasarkan estimasi apakah akan terdapat tambahan pajak penghasilan badan dan pajak lainnya.

Aset Pajak Tangguhan

Aset pajak tangguhan diakui atas seluruh perbedaan temporer yang dapat dikurangkan, sepanjang besar kemungkinannya bahwa penghasilan kena pajak akan tersedia sehingga perbedaan temporer tersebut dapat digunakan. Estimasi signifikan oleh manajemen disyaratkan dalam menentukan jumlah aset pajak tangguhan yang dapat diakui, berdasarkan saat penggunaan dan tingkat penghasilan kena pajak serta strategi perencanaan pajak masa depan.

Menentukan jangka waktu kontrak dengan opsi perpanjangan dan penghentian kontrak - Bank sebagai *lessee*

Bank menentukan jangka waktu sewa sebagai jangka waktu sewa yang tidak dapat dibatalkan, bersama dengan periode yang dicakup oleh opsi untuk memperpanjang masa sewa jika dipastikan akan dilaksanakan, atau periode apa pun yang dicakup oleh opsi untuk menghentikan sewa, jika cukup wajar untuk tidak dilakukan.

Bank memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan penghentian jangka waktu sewa. Bank menerapkan penilaian dalam mengevaluasi apakah dapat dipastikan jika akan menggunakan opsi untuk memperpanjang atau menghentikan sewa. Hal tersebut dilakukan dengan mempertimbangkan seluruh fakta dan keadaan yang relevan yang memberikan insentif ekonomi untuk melakukan perpanjangan atau penghentian sewa. Setelah tanggal dimulainya, Bank menilai kembali masa sewa, jika terdapat peristiwa atau perubahan signifikan dalam keadaan yang berada dalam kendali dan mempengaruhi apakah *lessee* cukup pasti untuk mengeksekusi opsi memperpanjang atau menghentikan sewa.

3. USE OF SIGNIFICANT ACCOUNTING ESTIMATES AND JUDGEMENTS (continued)

Taxation

Significant consideration is made in determining the provision of corporate income tax and other taxes. There are certain transactions and calculations that the final tax determination is uncertain in the normal course of business. The Bank recognised liability for corporate income tax and other taxes based on an estimate whether there would be an additional corporate income tax and other taxes.

Deferred tax assets

Deferred tax assets are recognised for all deductible temporary differences, as long as it is likely that taxable income will be available so that the temporary differences can be utilised. Significant estimates by management are required in determining the amount of deferred tax assets that can be recognised, based on utilisation and the level of taxable income and future tax planning strategies.

Determine the contract term with options for extension and termination of the contract - the Bank as lessee

The Bank determines the lease term as the term of the lease that cannot be cancelled, together with the period covered by the option to extend the lease if it is determined to be exercised, or any period covered by the option to terminate the lease, if it is reasonably reasonable not to do so.

The Bank has several lease contracts that include options for extension and termination of the lease terms. The Bank applies its judgment in evaluating whether it is certain to exercise the option to extend or terminate the lease. This is done by considering all relevant facts and circumstances that provide economic incentives to extend or terminate the lease. After the commencement date, the Bank reassesses the lease term, if there is a significant event or change in circumstances which is under its control and affects whether the lessee is certain enough to exercise the option to extend or terminate the lease.

4. KAS / *4. CASH*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kas dalam khasanah			*Cash in vault*
Rupiah	43.357.072	41.558.149	*Rupiah*
Mata uang asing			*Foreign currencies*
Dolar Amerika Serikat	2.604.502	28.827.126	*United States Dollar*
Franc Swiss	105.763	89.610	*Swiss Franc*
Yen Jepang	53.782	17.515	*Japanese Yen*
Dolar Selandia Baru	42.257	57.944	*New Zealand Dollar*
Dolar Kanada	28.594	59.929	*Canadian Dollar*
Dolar Singapura	26.060	215.678	*Singapore Dollar*
Dolar Australia	9.591	54.073	*Australia Dolar*
Riyal Arab Saudi	9.382	-	*Saudi Riyal*
Won Korea	2.901	1.638	*Korean Won*
Dolar Taiwan	2.814	2.602	*New Taiwan Dollar*
Poundsterling Inggris	2.132	37.303	*Great Britain Poundsterling*
Baht Thailand	1.101	3.758	*Thailand Baht*
Yuan Cina	1.061	3.418	*Chinese Yuan*
Euro Eropa	978	580.753	*European Euro*
Dolar Hongkong	621	187	*Hongkong Dollar*
Ringgit Malaysia	296	1.079	*Malaysian Ringgit*
Kas	87.250	89.500	*Cash on hand*
Jumlah	**46.336.157**	**71.600.262**	***Total***

Kas dalam khasanah diasuransikan terhadap seluruh risiko kepada PT Victoria Insurance Tbk (pihak berelasi) dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp174.440.555 dan Rp129.906.941. Manajemen Bank berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas kas dalam khasanah yang dipertanggungkan.

Cash in vault, are insured against losses by all risks to PT Victoria Insurance Tbk (related party) with total insurance coverage as of December 31, 2025 and 2024 amounting to Rp174,440,555 and Rp129,906,941, respectively. The Bank's management believe that the insurance coverage is adequate to cover possible losses on insured cash in vault.

5. GIRO PADA BANK INDONESIA / *5. CURRENT ACCOUNTS WITH BANK INDONESIA*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	1.194.502.568	1.367.881.186	*Rupiah*
Dolar Amerika Serikat	43.588.450	33.171.795	*United States Dollar*
Jumlah	**1.238.091.018**	**1.401.052.981**	***Total***

6. GIRO PADA BANK LAIN / *6. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan bank / *a. By bank*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
PT Bank Central Asia Tbk	36.066.789	1.003.165	*PT Bank Central Asia Tbk*
PT Bank CIMB Niaga Tbk	165.452	682.048	*PT Bank CIMB Niaga Tbk*
PT Bank Negara Indonesia (Persero) Tbk	138.284	20.505.873	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Permata Tbk	119.832	128.829	*PT Bank Permata Tbk*
PT Bank Mandiri (Persero) Tbk	99.970	10.100.000	*PT Bank Mandiri (Persero) Tbk*
PT Bank Pan Indonesia Tbk	8.448	6.820	*PT Bank Pan Indonesia Tbk*
Sub jumlah	36.598.775	32.426.735	*Sub total*
Mata Uang Asing			***Foreign Currency***
PT Bank Negara Indonesia (Persero) Tbk	211.015.704	40.011.855	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Mandiri (Persero) Tbk	39.391.353	18.187.642	*PT Bank Mandiri (Persero) Tbk*
PT Bank Central Asia Tbk	28.376.349	22.452.434	*PT Bank Central Asia Tbk*
OCBC Bank, Singapura	989.806	244.686	*OCBC Bank, Singapore*
PT Bank ICBC Indonesia	487.773	784.237	*PT Bank ICBC Indonesia*
PT Bank CIMB Niaga Tbk	351.280	410.691	*PT Bank CIMB Niaga Tbk*
Bank of China (Hong Kong) Limited Cabang Jakarta	64.933	-	*Bank of China (Hong Kong) Limited Jakarta Branch*
Sub jumlah	280.677.198	82.091.545	*Sub total*
Jumlah	**317.275.973**	**114.518.280**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(5.945)	(44.983)	*Less: Allowance for impairment losses*
Jumlah - bersih	**317.270.028**	**114.473.297**	***Total - net***

Seluruh giro pada bank lain pada tanggal 31 Desember 2025 dan 2024 ditempatkan pada pihak ketiga dan tidak terdapat giro pada bank lain yang dijaminkan.

All current accounts with other banks as of December 31, 2025 and 2024 were placed with third parties and are not pledged as collateral.

b. Berdasarkan mata uang / *b. By currency*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Dolar Amerika Serikat	275.885.670	76.934.918	*United States Dollar*
Rupiah	36.598.775	32.426.735	*Rupiah*
Yen Jepang	2.825.210	3.649.952	*Japanese Yen*
Dolar Singapura	989.806	244.687	*Singapore Dollar*
China Yuan	625.232	851.297	*Chinese Yuan*
Euro Eropa	351.280	410.691	*European Euro*
Jumlah	**317.275.973**	**114.518.280**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(5.945)	(44.983)	*Less: Allowance for impairment losses*
Jumlah - bersih	**317.270.028**	**114.473.297**	***Total - net***

6. GIRO PADA BANK LAIN (lanjutan) / *6. CURRENT ACCOUNTS WITH OTHER BANKS (continued)*

c. Cadangan kerugian penurunan nilai / *c. Allowance for impairment losses*

Pada tanggal 31 Desember 2025 dan 2024, seluruh giro pada bank lain berada di *stage* 1. Bank telah membentuk cadangan kerugian penurunan nilai masing-masing sebesar Rp5.945 dan Rp44.983.

As of December 31, 2025 and 2024, all current accounts with other banks are classified in stage 1. Bank has set aside allowance for impairment losses amounted to Rp5,945 and Rp44,983, respectively.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the above allowance for impairment losses is adequate.

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN / *7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS*

a. Berdasarkan jenis, pihak dan bank / *a. By type, counterparties and bank*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			***Third party***
Interbank Call Money			*Interbank Call Money*
PT Bank Mega Tbk	500.000.000	-	*PT Bank Mega Tbk*
PT Bank Danamon Indonesia Tbk	300.000.000	-	*PT Bank Danamon Indonesia Tbk*
PT Bank OCBC NISP Tbk	300.000.000	-	*PT Bank OCBC NISP Tbk*
PT Bank Rakyat Indonesia (Persero) Tbk	150.000.000	-	*PT Bank Rakyat Indonesia (Persero) Tbk*
PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk	100.000.000	-	*PT Bank Pembangunan Daerah Jawa Barat dan Banten Tbk*
PT Bank Capital Indonesia Tbk	50.000.000	-	*PT Bank Capital Indonesia Tbk*
Sub jumlah	1.400.000.000	-	Sub total
Deposito Berjangka			*Time Deposit*
PT Bank DKI	3.900.000	11.000.000	*PT Bank DKI*
PT Bank Nationalnobu Tbk	1.200.000	-	*PT Bank Nationalnobu Tbk*
PT Bank KB Bukopin Syariah	-	1.200.000	*PT Bank KB Bukopin Syariah*
Sub jumlah	5.100.000	12.200.000	Sub total
Jumlah	**1.405.100.000**	**12.200.000**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(67.613)	(2.745)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.405.032.387**	**12.197.255**	***Total - net***

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat penempatan pada Bank Indonesia dan bank lain yang dijaminkan.

As of December 31, 2025 and 2024, there are no placements with Bank Indonesia and other banks pledged as collateral.

7. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

7. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

b. Berdasarkan tenor jatuh tempo

b. By period maturity

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Kurang dari 1 bulan	1.400.000.000	-	*Less than 1 month*
1 sampai 3 bulan	5.100.000	12.200.000	*1 up to 3 months*
Jumlah	**1.405.100.000**	**12.200.000**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(67.613)	(2.745)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.405.032.387**	**12.197.255**	***Total - net***

c. Berdasarkan mata uang

c. By currency

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Rupiah	1.405.100.000	12.200.000	*Rupiah*
Jumlah	**1.405.100.000**	**12.200.000**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(67.613)	(2.745)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.405.032.387**	**12.197.255**	***Total - net***

d. Cadangan kerugian penurunan nilai

Pada tanggal 31 Desember 2025 dan 2024 seluruh penempatan pada Bank Indonesia dan bank lain berada di *stage* 1. Bank telah membentuk cadangan kerugian penurunan nilai masing-masing sebesar Rp67.613 dan Rp2.745.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

d. Allowance for impairment losses

As of December 31, 2025 and 2024, all placements in Bank Indonesia and other banks are classified in stage 1. Bank has set aside allowance for impairment losses amounted to Rp67,613 and Rp2,745, respectively.

Management believes that the above allowance for impairment losses is adequate.

8. EFEK-EFEK / *8. MARKETABLE SECURITIES*

a. Berdasarkan jenis / *a. By type*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Nilai wajar melalui laba rugi			***Fair value through profit or loss***
Obligasi pemerintah	-	146.629.037	*Government bonds*
Sub jumlah	-	146.629.037	*Sub total*
Nilai wajar melalui penghasilan komprehensif lain			***Fair value through other comprehensive income***
Reksadana	2.164.881.168	836.818.168	*Mutual funds*
Surat Utang Negara	1.951.511.896	1.117.503.740	*Government Promissory Notes*
Wesel jangka menengah	274.920.560	203.189.640	*Medium-term notes*
Surat Berharga Syariah Negara	270.211.432	287.857.133	*Government Sharia Bonds*
Obligasi korporasi	141.932.966	204.964.356	*Corporate bonds*
Surat Berharga Syariah Korporasi	91.553.415	-	*Corporate Sharia Bonds*
Sekuritas Rupiah Bank Indonesia (SRBI)	79.914.636	-	*Bank Indonesia Rupiah Securities (SRBI)*
Efek Beragun Aset	262.492	1.002.379	*Asset-backed security*
Sub jumlah	4.975.188.565	2.651.335.416	*Sub total*
Biaya perolehan diamortisasi			***Amortised cost***
Surat Utang Negara	4.074.410.470	3.239.743.291	*Government Promissory Notes*
Obligasi korporasi	448.890.000	571.464.777	*Corporate bonds*
Reksadana	358.552.082	75.952.436	*Mutual funds*
Sekuritas Rupiah Bank Indonesia (SRBI)	196.672.169	760.504.579	*Bank Indonesia Rupiah Securities (SRBI)*
Surat Berharga Syariah Korporasi	20.000.000	16.971.931	*Corporate Sharia Bonds*
Surat Berharga Syariah Negara	1.898.281	1.387.673	*Government Sharia Bonds*
Sub jumlah	5.100.423.002	4.666.024.687	*Sub total*
Jumlah	**10.075.611.567**	**7.463.989.140**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(1.153.091)	(1.266.198)	*Less: Allowance for impairment losses*
Jumlah - bersih	**10.074.458.476**	**7.462.722.942**	***Total - net***

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

a. Berdasarkan jenis (lanjutan) / *a. By type (continued)*

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat efek-efek yang dijaminkan.

As of December 31, 2025 and 2024, there are no marketable securities pledged as collateral.

Pada tanggal 31 Desember 2025 dan 2024, terdapat surat utang negara dalam transaksi efek-efek yang dijual dengan janji untuk dibeli kembali dengan nilai tercatat sebesar Rp693.569.220 dan Rp587.475.014 (Catatan 21).

As of December 31, 2025 and 2024, there are bonds under transaction securities sold under repurchase agreement with carrying amount of Rp693,569,220 and Rp587,475,014 (Note 21).

b. Obligasi korporasi / *b. Corporate bonds*

i. Nilai wajar melalui penghasilan komprehensif lain / *i. Fair value through other comprehensive income*

31 Desember/*December 31, 2025*

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Bumi Resources Tbk	Obligasi Berkelanjutan I Tahap I Tahun 2025 Seri B	51.402.917	8,50	8-Jul-28	idA+
PT Merdeka Battery Materials Tbk	Obligasi Berkelanjutan I Merdeka Battery Materials Tahap III Tahun 2025 Seri B	28.038.674	8,25	9-Dec-30	idA
PT Sumber Global Energi Tbk	Obligasi Berkelanjutan I Tahap I Tahun 2024 Seri B	22.797.688	10,75	10-Jul-26	idA-
PT Trimegah Sekuritas Indonesia Tbk	Obligasi Berkelanjutan II Tahap I Tahun 2025 Seri B	20.608.086	8,80	2-Jul-28	idA
PT Bumi Resources Tbk	Obligasi Berkelanjutan I Tahap III Tahun 2025	15.727.771	9,00	15-Dec-30	idA+
PT Merdeka Copper Gold Tbk	Obligasi Berkelanjutan IV Tahap IV Tahun 2023 Seri B	2.053.491	9,50	15-Dec-26	idA+
PT Global Mediacom Tbk	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri B	1.304.339	10,25	21-Jun-26	idA+
Jumlah/*Total*		**141.932.966**			

31 Desember/*December 31, 2024*

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Global Mediacom Tbk	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri A	100.319.794	8,75	1-Jul-25	idA+
PT Global Mediacom Tbk	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri B	102.623.595	10,25	21-Jul-27	idA+
PT Merdeka Copper Gold Tbk	Obligasi Berkelanjutan IV Tahap IV Tahun 2023 Seri B	2.020.967	9,5	15-Dec-26	idA+
Jumlah/*Total*		**204.964.356**			

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

b. Obligasi korporasi (lanjutan) / *b. Corporate bonds (continued)*

ii. Biaya perolehan diamortisasi / *ii. Amortised cost*

31 Desember/*December 31, 2025*

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Sarana Multigriya Finansial (Persero)	Obligasi Berkelanjutan VII Tahap VII SMF Tahun 2024	120.000.000	6,70	26-Nov-27	idAAA
PT Sarana Multi Infrastruktur (Persero)	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri C	129.890.000	6,95	6-Dec-29	idAAA
PT Sarana Multi Infrastruktur (Persero)	Obligasi Berkelanjutan IV Tahap II Tahun 2024 Seri B	126.000.000	6,70	6-Dec-27	idAAA
PT Sarana Multigriya Finansial (Persero)	Obligasi Berkelanjutan Sosial I Tahap IV Tahun 2024	50.000.000	7,00	26-Nov-29	idAAA
PT Barito Pacific Tbk	Obligasi Berkelanjutan III Tahun 2023 Seri B	15.000.000	9,25	8-Feb-28	idA+
PT TBS Energi Utama Tbk	Obligasi I Tahun 2023 Seri B	8.000.000	10,00	3-Mar-28	idA
Jumlah/*Total*		**448.890.000**			

31 Desember/*December 31, 2024*

Pihak penerbit/ *Issuers*	Obligasi/ *Bonds*	Jumlah/ *Amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal jatuh tempo/ *Maturity date*	Peringkat/ *Rating*
PT Barito Pacific Tbk	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	15.000.000	9,25	8-Feb-28	idA+
PT Sarana Multigriya Finansial (Persero)	Obligasi Berkelanjutan I Tahap IV Tahun 2023	50.000.000	7,00	26-Nov-29	idAAA
PT Sarana Multigriya Finansial (Persero)	Obligasi Berkelanjutan V Tahap IV Tahun 2020 Seri B	10.074.777	8,10	14-Jul-25	idAAA
PT Sarana Multigriya Finansial (Persero)	Obligasi Berkelanjutan VII Tahap VII Tahun 2023 Seri C	120.000.000	6,70	26-Nov-27	idAAA
PT Sarana Multi Infrastruktur (Persero)	Obligasi Berkelanjutan IV Tahap II Tahun 2023 Seri B	126.000.000	6,70	6-Des-27	idAAA
PT Sarana Multi Infrastruktur (Persero)	Obligasi Berkelanjutan IV Tahap II Tahun 2023 Seri C	129.890.000	6,95	6-Des-29	idAAA
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri B	50.000.000	10,25	7-Feb-26	irA+
PT Sinar Mas Multifinance	Obligasi Berkelanjutan III Tahap I Tahun 2023 Seri C	50.000.000	10,75	7-Feb-28	irA+
PT Sejahteraraya Anugrahjaya Tbk	Obligasi I Tahun 2022 Seri A	12.500.000	9,75	7-Okt-25	idA
PT Tbs Energi Utama Tbk	Obligasi I Tahun 2023 Seri B	8.000.000	10,00	3-Mar-28	idA
Jumlah/*Total*		**571.464.777**			

8. EFEK-EFEK (lanjutan) / *8. MARKETABLE SECURITIES (continued)*

c. Berdasarkan sisa umur jatuh tempo / *c. By remaining period to maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Diukur pada biaya perolehan diamortisasi			***Measured at amortised cost***
Kurang dari 1 tahun	1.305.629.694	1.235.345.249	*Less than 1 year*
1 sampai dengan 2 tahun	556.853.701	554.020.947	*1 up to 2 years*
2 sampai dengan 5 tahun	235.008.173	1.042.436.401	*2 up to 5 years*
Lebih dari 5 tahun	3.002.931.434	1.834.222.090	*More than 5 years*
Jumlah	**5.100.423.002**	**4.666.024.687**	***Total***

d. Perubahan cadangan kerugian penurunan nilai / *d. The changes in allowance for impairment losses*

Perubahan cadangan kerugian penurunan nilai efek-efek untuk tahun yang berakhir 31 Desember 2025 dan 2024 adalah sebagai berikut:

The changes in allowance for impairment losses on marketable securities for the year ended December 31, 2025 and 2024 are as follows:

	Untuk tahun yang berakhir pada tanggal/*For the year ended* 31 Desember/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**1.266.198**	**-**	**-**	**1.266.198**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	-	-	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage 2*)	-	-	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	-	-	-	-	*Transfer to credit impaired (Stage 3)*
Perubahan bersih pada eksposur	(113.107)	-	-	(113.107)	*Net change in exposure*
Penghapusbukuan	-	-	-	-	*Write-off*
Saldo akhir tahun	**1.153.091**	**-**	**-**	**1.153.091**	***Balance end of year***

	Untuk tahun yang berakhir pada tanggal/*For the year ended* 31 Desember/*December 31, 2024*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**8.271.969**			**8.271.969**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage 1*)	-	-	-	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage 2*)	-	-	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	-	-	-	-	*Transfer to credit impaired (Stage 3)*
Perubahan bersih pada eksposur	(7.005.771)	-	-	(7.005.771)	*Net change in exposure*
Penghapusbukuan	-	-	-	-	*Write-off*
Saldo akhir tahun	**1.266.198**	**-**	**-**	**1.266.198**	***Balance end of year***

8. EFEK-EFEK (lanjutan) / *MARKETABLE SECURITIES (continued)*

d. Perubahan cadangan kerugian penurunan nilai (lanjutan) / ***d. The changes in allowance for impairment losses (continued)***

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai di atas telah memadai.

Management believes that the above allowance for impairment losses is adequate.

9. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI / *SECURITIES PURCHASED UNDER RESALE AGREEMENTS*

Tidak terdapat efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2025.

No securities purchased under resale agreements as of December 31, 2025.

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2024 adalah sebagai berikut:

The securities purchased under resale agreements as of December 31, 2024 are as follows:

31 Desember/*December 31, 2024*

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai wajar/ *Fair value amount*	Tingkat suku bunga/ *Interest rate* (%)	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Indonesia	VR0034	96.698.110	6,00	31 Desember/ *December* 2024	7 Januari/ *January 2025*	98.887.810
Bank Indonesia	VR0034	96.698.110	6,00	31 Desember/ *December* 2024	7 Januari/ *January 2025*	98.887.810
Jumlah/ *Total*		**193.396.220**				**197.775.620**

Pada tanggal 31 Desember 2024, seluruh efek yang dibeli dengan janji dijual kembali digolongkan sebagai lancar dan berada di *stage* 1.

As of December 31, 2024, all securities purchased under resale agreements were classified as current and are in stage 1.

Manajemen berpendapat tidak diperlukan cadangan kerugian penurunan nilai pada tanggal 31 Desember 2024.

Management believes that no allowance for impairment losses is required as of December 31, 2024.

10. PENDAPATAN BUNGA YANG MASIH AKAN DITERIMA / *INTEREST INCOME RECEIVABLES*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pinjaman yang diberikan	231.046.049	240.991.343	*Loans*
Efek-efek	102.467.102	79.815.159	*Marketable securities*
Penampatan pada Bank Indonesia dan bank lain	234.444	-	*Placements with Bank Indonesia and other banks*
Efek-efek yang dibeli dengan janji dijual kembali	-	32.963	*Securities purchased under resale agreements*
Jumlah	**333.747.595**	**320.839.465**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(8.633.381)	(6.087.977)	*Less: Allowance for impairment losses*
Jumlah - bersih	**325.114.214**	**314.751.488**	***Total - net***

10. PENDAPATAN BUNGA YANG MASIH AKAN DITERIMA (lanjutan) / *10. INTEREST INCOME RECEIVABLES (continued)*

Mutasi cadangan kerugian penurunan nilai untuk pendapatan bunga yang masih akan diterima adalah sebagai berikut:

The changes in allowance for impairment losses of interest income receivables are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Saldo awal	**6.087.977**	**17.759.228**	***Beginning balance***
Penambahan selama tahun berjalan (Catatan 35)	2.545.404	17.523.019	*Addition during the year (Note 35)*
Penghapusbukuan	-	(29.194.270)	*Write-off*
Saldo akhir	**8.633.381**	**6.087.977**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas pendapatan bunga yang masih akan diterima.

Management believes that the allowance for impairment losses is adequate to cover possible losses from interest income receivables.

Semua pinjaman yang diberikan kepada debitur menggunakan mata uang Rupiah dan Dolar Amerika Serikat.

All loans granted by the Bank to the debtors denominated in Rupiah and United States Dollar.

11. PINJAMAN YANG DIBERIKAN / *11. LOANS*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pinjaman yang diberikan	22.380.166.216	20.559.860.321	*Loans*
Dikurangi: Cadangan kerugian penurunan nilai	(558.646.478)	(446.965.878)	*Less: Allowance for impairment of loan losses*
Jumlah - bersih	**21.821.519.738**	**20.112.894.443**	***Total - net***

a. Berdasarkan pihak dan jenis kredit / *a. By counterparties and loan type*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak Berelasi			***Related Parties***
Pinjaman tetap dengan angsuran	166.100.599	96.061.857	*Fixed loans with installments*
Pinjaman rekening koran	39.574.954	13.299.956	*Overdraft loans*
Pinjaman tetap	9.366.410	11.888.850	*Fixed loans*
Pinjaman serba guna	3.968.688	1.519.591	*Other loans*
Pinjaman konsumen	620.286	696.857	*Consumer loans*
Sub jumlah	219.630.937	123.467.111	*Sub total*
Pihak Ketiga			***Third Parties***
Pinjaman tetap	10.875.567.121	10.073.879.731	*Fixed loans*
Pinjaman tetap dengan angsuran	9.131.579.792	8.014.387.755	*Fixed loans with installments*
Pinjaman rekening koran	1.907.238.537	2.108.950.374	*Overdraft loans*
Pinjaman konsumen	177.779.270	166.649.807	*Consumer loans*
Pinjaman serba guna	68.370.559	72.525.543	*Other loans*
Sub jumlah	22.160.535.279	20.436.393.210	*Sub total*
Jumlah	**22.380.166.216**	**20.559.860.321**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(558.646.478)	(446.965.878)	*Less: Allowance for impairment losses*
Jumlah - bersih	**21.821.519.738**	**20.112.894.443**	***Total - net***

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

b. Berdasarkan jangka waktu periode perjanjian pinjaman / *b. By period of the loan agreement*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 tahun	7.904.763.449	8.174.754.905	*Less than 1 year*
1 sampai dengan 2 tahun	4.102.796.492	2.816.529.455	*1 up to 2 years*
2 sampai dengan 5 tahun	5.486.800.126	2.475.468.035	*2 up to 5 years*
Lebih dari 5 tahun	4.885.806.149	7.093.107.926	*More than 5 years*
Jumlah	22.380.166.216	20.559.860.321	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(558.646.478)	(446.965.878)	*Less: Allowance for impairment losses*
Jumlah - bersih	**21.821.519.738**	**20.112.894.443**	***Total - net***

c. Berdasarkan sisa umur jatuh tempo / *c. By remaining period to maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 tahun	11.146.553.249	11.156.818.125	*Less than 1 year*
1 sampai dengan 2 tahun	2.200.489.526	1.427.978.860	*1 up to 2 years*
2 sampai dengan 5 tahun	5.533.965.512	4.844.615.857	*2 up to 5 years*
Lebih dari 5 tahun	3.499.157.929	3.130.447.479	*More than 5 years*
Jumlah	22.380.166.216	20.559.860.321	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(558.646.478)	(446.965.878)	*Less: Allowance for impairment losses*
Jumlah - bersih	**21.821.519.738**	**20.112.894.443**	***Total - net***

d. Menurut *Stage* / *d. By Stage*

Berikut adalah perubahan jumlah pinjaman yang diberikan berdasarkan *stage* selama tahun yang berakhir 31 Desember 2025 dan 2024:

Below is movement of loans based on stages during the year ended December 31, 2025 and 2024:

	Untuk tahun yang berakhir pada tanggal/*For the year ended* 31 Desember/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**19.119.576.021**	**784.838.757**	**655.445.543**	**20.559.860.321**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	20.487.149	(19.946.597)	(540.552)	-	*Transfer to 12 months expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(397.250.510)	397.751.114	(500.604)	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(46.993.943)	(44.323.691)	91.317.634	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	18.695.818.717	1.118.319.583	745.722.021	20.559.860.321	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(1.880.010.864)	(97.406.600)	(31.076.520)	(2.008.493.984)	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	9.006.235.318	28.807.352	8.358.861	9.043.401.531	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(4.992.546.208)	(16.642.047)	(14.061.663)	(5.023.249.918)	*Derecognition of financial asset*
Aset keuangan yang dihapusbuku	-	-	(191.351.734)	(191.351.734)	*Write-off financial assets*
Total penambahan/(pengurangan) tahun berjalan	2.133.678.246	(85.241.295)	(228.131.056)	1.820.305.895	*Total additional/(reversal) during the year*
Saldo akhir tahun	**20.829.496.963**	**1.033.078.288**	**517.590.965**	**22.380.166.216**	***Balance end of year***

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

d. Menurut *Stage* (lanjutan) / *d. By Stage (continued)*

Berikut adalah perubahan jumlah pinjaman yang diberikan berdasarkan *stage* selama tahun yang berakhir 31 Desember 2025 dan 2024: (lanjutan)

Below is movement of loans based on stages during the year ended December 31, 2025 and 2024: (continued)

	Untuk tahun yang berakhir pada tanggal/*For the year ended* 31 Desember/*December 31, 2024*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**16.834.895.372**	**1.050.384.426**	**743.463.379**	**18.628.743.177**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	34.863.775	(12.553.637)	(22.310.138)	-	*Transfer to 12 months expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(173.779.654)	173.779.654	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(83.452.847)	(285.386.494)	368.839.341	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	16.612.526.646	926.223.949	1.089.992.582	18.628.743.177	*Total opening balance after transfer*
Pengukuran kembali bersih nilai tercatat	(1.140.627.945)	(54.586.943)	(99.184.429)	(1.294.399.317)	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	7.809.412.723	49.523.265	-	7.858.935.988	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(4.161.735.403)	(136.321.514)	(16.520.746)	(4.314.577.663)	*Derecognition of financial asset*
Aset keuangan yang dihapusbuku	-	-	(318.841.864)	(318.841.864)	*Write-off financial assets*
Total penambahan/(pengurangan) tahun berjalan	2.507.049.375	(141.385.192)	(434.547.039)	1.931.117.144	*Total additional/(reversal) during the year*
Saldo akhir tahun	**19.119.576.021**	**784.838.757**	**655.445.543**	**20.559.860.321**	***Balance end of year***

e. Perubahan cadangan kerugian penurunan nilai / *e. The changes in allowance for impairment losses*

	Untuk tahun yang berakhir pada tanggal/*For the year ended* 31 Desember/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/ *Total***	
Saldo awal tahun	**78.060.271**	**188.445.883**	**180.459.724**	**446.965.878**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	10.785.575	(10.576.913)	(208.662)	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(4.661.611)	4.854.215	(192.604)	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(1.376.078)	(6.402.613)	7.778.691	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	82.808.157	176.320.572	187.837.149	446.965.878	*Beginning balance after stage transfer*
Pengukuran kembali bersih penyisihan kerugian	(17.086.494)	122.903.302	168.047.127	273.863.935	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	36.161.352	9.005.607	5.038.430	50.205.389	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(14.921.351)	(2.212.560)	(3.903.078)	(21.036.989)	*Derecognised financial assets*
Aset keuangan yang dihapusbuku	-	-	(191.351.735)	(191.351.735)	*Write-off financial assets*
Total penambahan/(penurunan) tahun berjalan	4.153.507	129.696.349	(22.169.256)	111.680.600	*Total addition/(reversal) during the year*
Saldo akhir tahun	**86.961.664**	**306.016.921**	**165.667.893**	**558.646.478**	***Balance end of year***

11. PINJAMAN YANG DIBERIKAN (lanjutan)

e. Perubahan cadangan kerugian penurunan nilai (lanjutan)

11. LOANS (continued)

e. The changes in allowance for impairment losses (continued)

	Untuk tahun yang berakhir pada tanggal/*For the year ended* 31 Desember/*December 31, 2024*				
	Stage 1	*Stage* 2	*Stage* 3	Jumlah/ *Total*	
Saldo awal tahun	**112.806.057**	**322.204.788**	**139.861.357**	**574.872.202**	***Balance beginning of year***
Transfer ke kerugian kredit ekspektasian 12 bulan (*Stage* 1)	12.949.232	(1.132.134)	(11.817.098)	-	*Transfer to 12 month expected credit losses (Stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*Stage* 2)	(1.049.161)	1.049.161	-	-	*Transfer to lifetime expected credit losses (Stage 2)*
Transfer ke kredit yang mengalami penurunan nilai (*Stage* 3)	(2.070.794)	(116.170.501)	118.241.295	-	*Transfer to credit impaired (Stage 3)*
Total saldo awal setelah pengalihan	122.635.334	205.951.314	246.285.554	574.872.202	*Beginning balance after stage transfer*
Pengukuran kembali bersih penyisihan kerugian	(56.576.673)	(385.312)	256.680.765	199.718.780	*Net remeasurement of carrying amount*
Aset keuangan yang baru diterbitkan atau dibeli	29.899.871	22.924.119	-	52.823.990	*New financial asset originated or purchased*
Aset keuangan yang dihentikan pengakuannya	(17.898.261)	(40.044.238)	(3.664.730)	(61.607.229)	*Derecognised financial assets*
Aset keuangan yang dihapusbuku	-	-	(318.841.865)	(318.841.865)	*Write-off financial assets*
Total penambahan/(penurunan) tahun berjalan	(44.575.063)	(17.505.431)	(65.825.830)	(127.906.324)	*Total addition/(reversal) during the year*
Saldo akhir tahun	**78.060.271**	**188.445.883**	**180.459.724**	**446.965.878**	***Balance end of year***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai untuk pinjaman yang diberikan adalah cukup untuk menutup kerugian yang mungkin timbul akibat tidak tertagihnya pinjaman.

The management believe that allowance for impairment losses of loans is adequate to cover impairment losses that might arise from uncollectible loans.

Jaminan atas pinjaman yang diberikan berupa tanah, bangunan, saham, giro, deposito berjangka, mesin, persediaan, dan piutang. Deposito berjangka yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp1.047.337.799 dan Rp1.116.894.988 (Catatan 19) dengan *outstanding* pinjaman masing-masing sebesar Rp1.684.080.888 dan Rp862.093.354. Giro yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp845.919.603 dan Rp680.735.509 (Catatan 19) dengan *outstanding* pinjaman masing-masing sebesar Rp1.014.992.776 dan Rp655.693.377. Tabungan yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp290.950.000 dan Rp133.150.000 (Catatan 19) dengan *outstanding* pinjaman sebesar Rp284.642.840 dan Rp111.577.164. *Negotiable Certificate Deposits* (NCD) yang dijadikan jaminan tunai untuk pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp5.500.000 dan Rp131.000.000 (Catatan 19) dengan *outstanding* pinjaman sebesar RpNihil dan Rp111.804.157.

Collaterals for loans are in form of as land, building, shares, demand deposits, time deposits, machinery, inventories, and receivables. Time deposits that are pledged as cash collateral for loans as of December 31, 2025 and 2024 amounted to Rp1,047,337,799 and Rp1,116,894,988 (Note 19) with loan outstanding of Rp1,684,080,888 and Rp862,093,354, respectively. Demand deposits that are pledged as cash collateral for loans as of December 31, 2025 and 2024 amounted to Rp845,919,603 and Rp680,735,509 (Note 19) with loan outstanding of Rp1,014,992,776 and Rp655,693,377, respectively. Saving deposits that are pledged as cash collateral for loans as of December 31, 2025 amounted to Rp290,950,000 and Rp133,150,000 (Note 19) with loan outstanding of Rp284,642,840 and Rp111,577,164. Negotiable Certificate Deposits (NCD) that are pledged as cash collateral for loans as of December 31, 2025 and 2024 amounted to Rp5,500,000 and Rp131,000,000 (Note 19) with loan outstanding of RpNil and Rp111,804,157, respectively.

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

f. Pinjaman yang direstrukturisasi / *f. Restructured loans*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Penjadwalan kembali angsuran dan perpanjangan jangka waktu pinjaman	1.874.533.250	2.206.449.707	*Rescheduling of installments and the extention of credit period*
Dikurangi: Cadangan kerugian penurunan nilai	(434.913.848)	(342.681.080)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.439.619.402**	**1.863.768.627**	***Total - net***

Berikut adalah jumlah pinjaman yang direstrukturisasi berdasarkan kolektibilitas pada tanggal 31 Desember 2025 dan 2024:

Below are the balance of restructured loans based on collectability as of December 31, 2025 and 2024:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Lancar	739.195.345	1.026.325.805	*Current*
Dalam Perhatian Khusus	674.693.871	594.208.247	*Special Mention*
Kurang Lancar	46.127.599	57.185.617	*Substandard*
Diragukan	461.689	500.604	*Doubtful*
Macet	414.054.746	528.229.434	*Loss*
Jumlah pinjaman yang direstrukturisasi	1.874.533.250	2.206.449.707	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(434.913.848)	(342.681.080)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.439.619.402**	**1.863.768.627**	***Total - net***

Berikut adalah jumlah pinjaman yang direstrukturisasi berdasarkan jenis pinjaman pada tanggal 31 Desember 2025 dan 2024:

Below are the balance of restructured loans based on type as of December 31, 2025 and 2024:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pinjaman tetap	985.937.697	1.271.995.717	*Fixed loans*
Pinjaman tetap dengan angsuran	771.426.265	780.017.869	*Fixed loans with installments*
Pinjaman rekening koran	96.752.397	118.862.862	*Overdraft loans*
Pinjaman konsumen	13.999.765	22.005.152	*Consumer loans*
Pinjaman serba guna	6.417.126	13.568.107	*Multi purpose loans*
Jumlah pinjaman yang direstrukturisasi	1.874.533.250	2.206.449.707	*Total restructured loans*
Dikurangi: Cadangan kerugian penurunan nilai	(434.913.848)	(342.681.080)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.439.619.402**	**1.863.768.627**	***Total - net***

11. PINJAMAN YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

f. Pinjaman yang direstrukturisasi (lanjutan) / *f. Restructured loans (continued)*

Sehubungan dengan restrukturisasi dan relaksasi kredit sebagai dampak dari COVID-19, regulator mengeluarkan POJK No.11/POJK.03/2020 tanggal 16 Maret 2020 tentang Stimulus Perekonomian Nasional sebagai Kebijakan *Countercyclical* Dampak Penyebaran COVID-19 yang kemudian diperbaharui dengan POJK No.48/POJK.03/2020 tanggal 1 Desember 2020 dan diperbaharui dengan POJK No.17/POJK.03/2021 tanggal 10 September 2021. Jumlah pinjaman yang diberikan yang telah direstrukturisasi akibat dampak pandemi COVID-19 pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp624.115.575 dan Rp1.104.763.375.

In relation to loan restructuring and relaxation due to COVID-19 impact, the regulator issued POJK No.11/POJK.03/2020 dated March 16, 2020 regarding National Economy Stimulus as the COVID-19 Outbreak Impact Countercyclical Policy that amended to POJK No. 48/POJK.03/2020 dated December 1, 2020 and reamend under POJK No.17/POJK.03/2021 dated on September 10, 2021. The amount of loan that have been restructured as a result of the COVID-19 pandemic as of December 31, 2025 and 2024 amounting to Rp624,115,575 and Rp1,104,763,375, respectively.

Skema restrukturisasi yang disepakati oleh Bank dan debitur meliputi antara lain penjadwalan ulang pembayaran pokok kredit dan bunga, penurunan suku bunga, novasi dan lain-lain.

Restructured loans scheme agreed by the Bank and its debtors include loans principal and interest rescheduling, reduction of interest rates, novation and others.

12. TAGIHAN AKSEPTASI / *12. ACCEPTANCES RECEIVABLE*

Rincian tagihan akseptasi kepada nasabah adalah sebagai berikut:

The details of acceptances receivable from customers are as follows:

a. Berdasarkan mata uang / *a. By currency*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Tagihan kepada debitur			*Receivables from debtors*
Pihak ketiga	11.308.073	6.143.659	*Third parties*
Mata Uang Asing			***Foreign Currency***
Tagihan kepada debitur			*Receivables from debtors*
Pihak ketiga	9.983.298	11.648.080	*Third parties*
Jumlah	**21.291.371**	**17.791.739**	***Total***

b. Berdasarkan tenor jatuh tempo / *b. By period maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
1 sampai 3 bulan	3.450.666	3.081.543	*1 up to 3 months*
3 sampai 6 bulan	7.857.407	3.062.116	*3 up to 6 months*
Sub jumlah	11.308.073	6.143.659	*Sub total*
Mata Uang Asing			***Foreign Currency***
1 sampai 6 bulan	9.983.298	-	*1 up to 3 months*
3 sampai 6 bulan	-	11.648.080	*3 up to 6 months*
Sub jumlah	9.983.298	11.648.080	*Sub total*
Jumlah	**21.291.371**	**17.791.739**	***Total***

13. PENYERTAAN SAHAM / *13. INVESTMENTS IN SHARES*

	Kepemilikan/ *Ownership*	31 Desember 2025/ *December 31,2025*	31 Desember 2024/ *December 31,2024*	
Diukur pada FVTPL				***Measured at FVTPL***
PT Bima Multi Finance	0,00%	0*)	0*)	*PT Bima Multi Finance*
Entitas asosiasi				***Associate Entity***
PT Bank Victoria Syariah	19,81%	-	219.933.809	*PT Bank Victoria Syariah*
Jumlah		**-**	**219.933.809**	***Total***

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

**) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)*

Pada tanggal 15 Desember 2023, Bank melakukan transaksi penjualan atas saham yang dimiliki pada PT Bima Multi Finance kepada PT Sumber Daya Sakti dengan harga jual sebesar Rp80.297. Nilai jual ditentukan diatas hasil penilaian yang dilakukan oleh KJPP Tri, Santi & Rekan tertanggal 8 Desember 2023. Sampai dengan tanggal laporan keuangan ini, transaksi pengalihan saham masih dalam proses pelaporan dan pencatatan di Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia oleh PT Bima Multi Finance. Pada tanggal 31 Maret 2023, Bank telah mencatat kerugian penurunan nilai wajar atas penyertaan saham PT Bima Multi Finance sebesar Rp31.877.279, sehingga nilai tercatat penyertaan saham di PT Bima Multi Finance adalah Rp1 (dalam nilai penuh) per 31 Desember 2025 dan 2024.

On December 15, 2023, the Bank sold its shares ownership in PT Bima Multi Finance to PT Sumber Daya Sakti with selling price of Rp80,297. The selling value is above the result of valuation performed by KJPP Tri, Santi & Partners dated December 8, 2023. As of the date of this financial statements, the share transfer transaction is still in the process of registering and recording in Ministry of Law and Human Rights of the Republic of Indonesia. As of March 31, 2023, the Bank has recorded a loss from decrease in fair value on shares ownership in PT Bima Multi Finance amounting to Rp31,877,279, therefore the balance of investment in shares in PT Bima Multi Finance is Rp1 (in full amount) as of December 31, 2025 and 2024.

Berdasarkan Berita Acara Rapat Umum Luar Biasa para Pemegang Saham PT Bima Multi Finance tertanggal 12 November 2018 dan Akta Notaris No. 19 tanggal 12 Maret 2019 yang dibuat dihadapan Drs. Wijanto Suwongso, SH., Notaris di Jakarta, Bank dan beberapa kreditur lainnya telah menyetujui konversi pinjaman jangka panjang dan MTN PT Bima Multi Finance menjadi saham dengan nilai konversi Rp500 per lembar saham (nilai Rupiah penuh). Perubahan ini telah diterima dan dicatat di dalam database Sistem Administrasi Badan Hukum Kementerian Hukum dan Hak Asasi Manusia Republik Indonesia berdasarkan Surat No. AHU-AH.01.03-0151322 tanggal 15 Maret 2019. Melalui proses konversi ini, Bank memiliki persentase kepemilikan sebesar 34,91% di PT Bima Multi Finance dan mencatatnya sebagai penyertaan saham sementara sebesar Rp168.907.325 (bruto). Setelah mencatat penyertaan saham sementara, Bank tidak lagi mengakui pinjaman yang diberikan dan MTN pada PT Bima Multi Finance.

Based on the Minutes of Extraordinary Shareholders Meeting of PT Bima Multi Finance dated November 12, 2018 and Notarial Deed No. 19 dated March 12, 2019 of Drs. Wijanto Suwongso, S.H., a Notary in Jakarta, Bank and the other creditors have agreed on the convertion from long term loan and MTN of PT Bima Multi Finance into shares with convertion rate of Rp500 per shares (Rupiah full amount). This changes has been accepted and recorded in database of Legal Entities Administration System of the Ministry of Law and Human Rights of the Republic of Indonesia in its Letter No. AHU-AH.01.03-0151322 dated March 15, 2019. From this convertion process, Bank has 34.91% percentage of ownership in PT Bima Multi Finance and recorded as temporary investment in shares amounted to Rp168,907,325 (gross). After recording a temporary investment in shares, the Bank no longer recognise the loans and MTN in PT Bima Multi Finance.

13. PENYERTAAN SAHAM (lanjutan)

Bank wajib untuk melakukan divestasi penyertaan saham sementara apabila penyertaan saham sementara telah melebihi jangka waktu paling lama 5 (lima) tahun atau PT Bima Multi Finance telah mencatatkan saldo laba positif pada ekuitasnya. Hal ini sesuai dengan intensi dari Bank untuk menjual penyertaan saham sementara pada PT Bima Multi Finance apabila telah memenuhi kriteria yang ditentukan.

Bank juga tidak memiliki pengaruh signifikan pada PT Bima Multi Finance dibuktikan dengan:

i. Tidak terdapat wakil dari Bank yang menjabat sebagai Dewan Direksi dan Dewan Komisaris atau organ setara di PT Bima Multi Finance;

ii. Bank tidak berpartisipasi dalam proses pembuatan kebijakan, termasuk dalam partisipasi dalam pengambilan keputusan tentang dividen atau distribusi lain pada PT Bima Multi Finance;

iii. Tidak adanya transaksi material antara Bank dengan PT Bima Multi Finance;

iv. Tidak terdapat pertukaran personil manajerial antara Bank dengan PT Bima Multi Finance; dan

v. Bank tidak terlibat dalam penyediaan teknis informasi pokok untuk PT Bima Multi Finance.

Pada tanggal 5 Juni 2025, Bank melakukan transaksi penjualan atas saham yang dimiliki pada PT Bank Victoria Syariah kepada PT Bank Tabungan Negara (“Persero”) Tbk, sesuai dengan akta Jual Beli Pengambilalihan Saham dalam PT Bank Victoria Syariah No.13 tertanggal 5 Juni 2025 dibuat dihadapan Ashoya Ratam S.H., M.Kn, notaris di Jakarta, jumlah yang harus dibayar oleh PT Bank Tabungan Negara (“Persero”) Tbk kepada Bank untuk penjualan dan pengalihan saham yang dijual sebesar Rp322.493.298. Pada 31 Mei 2025, bank mengakui penyertaan saham atas PT Bank Victoria Syariah sebesar Rp221.833.077. Atas penjualan saham tersebut, pada tanggal 31 Desember 2025 Bank mencatatkan Laba atas penjualan penyertaan saham, disajikan sebagai “Laba Penjualan Investasi” pada Pendapatan Operasional Lainnya sebesar Rp100.660.221 (Catatan 34).

Lihat Catatan 48 untuk pengukuran nilai wajar penyertaan saham pada tanggal 31 Desember 2025 dan 2024.

13. INVESTMENTS IN SHARES (continued)

Banks are obliged to divest temporary investment in shares if the temporary investment in shares have exceeded a maximum period of 5 (five) years or PT Bima Multi Finance has recorded positive retained earnings in their equity. This is in accordance with the Bank's intention to sell the temporary investment in PT Bima Multi Finance if it has meets the specified criteria.

Bank also does not have a significant influence on PT Bima Multi Finance as evidenced by:

i. There is no representative from the Bank who serves as the Board of Directors and the Board of the Commissioners or equivalent organs in PT Bima Multi Finance;

ii. The Bank does not participate in the policy-making process, including participation in decision-making about dividends or other distributions in PT Bima Multi Finance;

iii. There is no material transaction between the Bank and PT Bima Multi Finance;

iv. There is no managerial personnel exchange between the Bank and PT Bima Multi Finance; and

v. The Bank is not involved in providing principal technical information for PT Bima Multi Finance.

On June 5, 2025, the Bank conducted a sale transaction of shares owned in PT Bank Victoria Syariah to PT Bank Tabungan Negara (“Persero”) Tbk, in accordance with the deed of Sale and Purchase of Acquisition of Shares in PT Bank Victoria Syariah No. 13 dated June 5, 2025 made of Ashoya Ratam S.H., M.Kn, a notary in Jakarta, the amount that must be paid by PT Bank Tabungan Negara (“Persero”) Tbk to the Bank for the share transfer transaction is Rp322,493,298. On May 31, 2025, Bank has recorded investment in share of PT Bank Victoria Syariah amounted to Rp221,833,077. On December 31, 2025, the Bank recognized a gain on disposal recorded as “Gain on Investment Sale” in Other Operating Income amounted to Rp100,660,221 (Note 34).

Refer to Note 48 for fair value measurement of investment in shares as of December 31, 2025 and 2024.

14. BIAYA DIBAYAR DIMUKA / *14. PREPAID EXPENSES*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Promosi	19.128.828	23.670.778	*Promotion*
Pengembangan teknologi	15.898.605	3.578.500	*Technology development*
Sewa dibayar dimuka	163.190	174.368	*Prepaid rent*
Lain-lain	3.062.275	3.719.980	*Others*
Jumlah	**38.252.898**	**31.143.626**	***Total***

Lain-lain sebagian besar terdiri dari premi asuransi dibayar dimuka, biaya dibayar dimuka personalia dan biaya jasa hukum.

Others mainly consists of prepaid insurances, prepaid salaries expenses and legal fees.

15. ASET TETAP DAN ASET HAK-GUNA / *15. FIXED ASSETS AND RIGHT-OF-USE ASSETS*

Aset tetap dan aset hak guna terdiri dari:

Fixed assets and right-of-use assets consist of the following:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kepemilikan langsung	429.427.626	415.004.637	*Direct ownership*
Aset hak-guna	56.951.844	56.184.135	*Right-of-use assets*
Jumlah	**486.379.470**	**471.188.772**	***Total***
Dikurangi: Akumulasi penyusutan	(104.749.107)	(79.755.235)	*Less: Accumulated depreciation*
Jumlah - bersih	**381.630.363**	**391.433.537**	***Total - net***

Aset tetap kepemilikan langsung / ***Direct ownership fixed assets***

	31 Desember/*December 31, 2025*						
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Kapitalisasi/ *Capitalisation*	Revaluasi/ *Revaluation*	Saldo akhir/ *Ending balance*	
Biaya Perolehan							***Acquisition Cost***
Kepemilikan langsung:							*Direct ownership:*
Tanah	294.106.885	-	-	-	-	294.106.885	*Land*
Bangunan	39.754.771	6.028.486	-	-	-	45.783.257	*Buildings*
Mesin-mesin dan peralatan	55.536.393	10.033.504	(1.073.292)	-	-	64.496.605	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.988.008	162.405	(145.938)	-	-	7.004.475	*Office furniture and equipment*
Kendaraan bermotor	7.558.580	-	(586.950)	-	-	6.971.630	*Vehicles*
Aset tetap dalam proses pembangunan	11.060.000	4.774	-	-	-	11.064.774	*Assets under constructions*
Jumlah biaya perolehan	415.004.637	16.229.169	(1.806.180)	-	-	429.427.626	*Total acquisition cost*
Akumulasi Penyusutan							***Accumulated Depreciation***
Kepemilikan langsung:							*Direct ownership:*
Mesin-mesin dan peralatan	33.488.081	9.292.188	(1.073.292)	-	-	41.706.977	*Machinery and equipment*
Bangunan	17.177.816	4.607.934	-	-	-	21.785.750	*Buildings*
Kendaraan bermotor	3.373.633	1.338.059	(586.950)	-	-	4.124.742	*Vehicles*
Perlengkapan dan perabotan kantor	6.334.794	286.371	(145.938)	-	-	6.475.227	*Office furniture and equipment*
Jumlah akumulasi penyusutan	60.374.324	15.524.552	(1.806.180)	-	-	74.092.696	*Total accumulated depreciation*
Nilai buku bersih	**354.630.313**					**355.334.930**	***Net book value***

15. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *15. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset tetap kepemilikan langsung (lanjutan) / *Direct ownership fixed assets (continued)*

	31 Desember/*December 31, 2024*						
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Pengurangan/ *Deductions*	Kapitalisasi/ *Capitalisation*	Revaluasi/ *Revaluation*	Saldo akhir/ *Ending balance*	
Biaya Perolehan							***Acquisition Cost***
Kepemilikan langsung:							*Direct ownership:*
Tanah	316.137.746	-	(30.010.821)	-	7.979.960	294.106.885	*Land*
Bangunan	51.001.653	2.673.440	(1.115.203)		(12.805.119)	39.754.771	*Buildings*
Kendaraan bermotor	8.125.155	2.884.800	(3.451.375)	-	-	7.558.580	*Vehicles*
Mesin-mesin dan peralatan	42.409.202	13.870.498	(743.307)	-	-	55.536.393	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.647.750	373.358	(33.100)	-	-	6.988.008	*Office furniture and equipment*
Aset dalam pembangunan	19.290.946	-	-	-	(8.230.946)	11.060.000	*Assets under constructions*
Jumlah biaya perolehan	443.612.452	19.802.096	(35.353.806)	-	(13.056.105)	415.004.637	*Total acquisition cost*
Akumulasi Penyusutan							***Accumulated Depreciation***
Kepemilikan langsung:							*Direct ownership:*
Bangunan	27.680.724	3.945.713	(743.470)	-	(13.705.151)	17.177.816	*Buildings*
Kendaraan bermotor	5.928.291	896.717	(3.451.375)	-	-	3.373.633	*Vehicles*
Mesin-mesin dan peralatan	27.415.712	6.815.676	(743.307)	-	-	33.488.081	*Machinery and equipment*
Perlengkapan dan perabotan kantor	6.110.364	257.530	(33.100)	-	-	6.334.794	*Office furniture and equipment*
Jumlah akumulasi penyusutan	67.135.091	11.915.636	(4.971.252)	-	(13.705.151)	60.374.324	*Total accumulated depreciation*
Nilai buku bersih	**376.477.361**					**354.630.313**	***Net book value***

Rincian laba/(rugi) penjualan aset tetap adalah sebagai berikut:

The details of gain/(loss) on sale of fixed assets are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Hasil penjualan aset tetap	190.120	28.782.400	*Proceeds from sale of fixed assets*
Nilai buku	-	(30.382.553)	*Book value*
Laba/(rugi) penjualan aset tetap (Catatan 39)	**190.120**	**(1.600.153)**	***Gain/(loss) on sale of fixed assets (Note 39)***

Laba/(rugi) penjualan aset tetap disajikan sebagai bagian dari akun "Beban (pendapatan) non-operasional - bersih" pada laporan laba rugi dan penghasilan komprehensif (Catatan 39).

Gain/(loss) on sale of fixed assets is presented as part of "Non-operating expense (income) - net" in the statement profit or loss and other comprehensive income (Note 39).

Aset dalam pembangunan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp11.064.774 dan Rp11.060.000 merupakan tanah dan bangunan yang dibeli dan masih dalam tahap perizinan dan perpanjangan Surat Hak Guna Bangunan (SHGB). Konstruksi tersebut diperkirakan akan selesai pada tahun 2027.

Assets under construction as of December 31, 2025 and 2024 amounting to Rp11,064,774 and Rp11,060,000, respectively, related to land and buildings that were bought but still under licensing phase and extension of Rights to Build (SHGB). Those constructions are estimated to be completed in 2027.

Bank memiliki beberapa bidang tanah yang terletak di Jakarta, Bandung, Surabaya, dan Denpasar dengan hak kepemilikan berupa Hak Guna Bangunan yang berjangka waktu antara 20 (dua puluh) sampai dengan 30 (tiga puluh) tahun yang akan jatuh tempo dalam berbagai tahun sampai tahun 2046. Manajemen berpendapat bahwa tidak terdapat masalah dengan perpanjangan hak atas tanah karena seluruh tanah diperoleh secara sah dan didukung dengan bukti kepemilikan yang memadai.

The Bank own several fields of land in Jakarta, Bandung, Surabaya, and Denpasar with Building Usage Rights ("HGB") for 20 (twenty) up to 30 (thirty) years which will expire in various years up to 2046. The management believes that there will be no difficulty in the extension of the land rights since all of the land were acquired legally and supported by sufficient evidence of ownership.

15. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *15. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset tetap kepemilikan langsung (lanjutan) / ***Direct ownership fixed assets (continued)***

Aset tetap, kecuali tanah, diasuransikan terhadap risiko kebakaran dan pencurian kepada PT Victoria Insurance Tbk (pihak berelasi) dengan nilai pertanggungan seluruhnya pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp153.689.550 dan Rp153.530.250. Manajemen Bank berpendapat bahwa nilai pertanggungan tersebut telah memadai untuk menutup kemungkinan kerugian atas aset tetap yang dipertanggungkan.

Fixed assets, except land, are insured against losses by fire and theft risks to PT Victoria Insurance Tbk (related party) with total insurance coverage as of December 31, 2025 and 2024 amounting Rp153,689,550 and Rp153,530,250, respectively. The Bank's management believe that the insurance coverage is adequate to cover possible losses on fixed assets insured.

Seluruh aset tetap yang ada pada tanggal pelaporan 31 Desember 2025 dan 2024 digunakan untuk menunjang aktivitas operasi Bank. Pada tanggal 31 Desember 2025 dan 2024, jumlah nilai perolehan aset tetap yang telah disusutkan penuh namun masih digunakan masing-masing adalah sebesar Rp60.339.784 dan Rp60.058.395.

All of the fixed assets as of the reporting date December 31, 2025 and 2024 are used to support the Bank's operation activities. As of December 31, 2025 and 2024, the total acquisition cost of fixed assets that have been fully depreciated but still in use amounted Rp60,339,784 and Rp60,058,395, respectively.

Manajemen Bank telah melakukan pengkajian kembali atas estimasi umur ekonomis, metode penyusutan dan nilai residu aset tetap pada tanggal 31 Desember 2025 dan 2024.

The Bank's Management has re-assessed the estimation of useful lives,depreciation method and residual value of fixed assets on December 31, 2025 and 2024.

Tidak terdapat aset tetap yang dihentikan dari penggunaan aktif atau diklasifikasikan sebagai tersedia untuk dijual.

There are no fixed assets discontinued from active use or classified as assets held for sale.

Berikut adalah perkiraan jumlah nilai tercatat aset tetap jika dicatat dengan metode biaya pada tanggal 31 Desember 2025 dan 2024:

Below is the estimated net book value of fixed asset if recorded using cost method as of December 31, 2025 and 2024:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Tanah	286.126.927	286.126.927	*Land*
Bangunan	23.097.475	22.048.312	*Buildingt*
Mesin dan Peralatan	22.789.628	21.676.922	*Machinery and equipment*
Aset tetap dalam proses pembangunan	19.295.720	19.290.946	*Assets under constructions*
Kendaraan Bermotor	2.846.888	4.184.947	*Vehicle*
Perlengkapan dan perabotan kantor	529.248	653.214	*Office furniture and equipment*
	354.685.886	**353.981.268**	

Aset hak-guna / ***Right-of-use assets***

Aset hak-guna pada 31 Desember 2025 dan 31 Desember 2024 adalah sebagai berikut:

Rights-of-use assets as of December 31, 2025 and 2024 are as follows:

	31 Desember/*December 31, 2025*					
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Disposals***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Aset hak-guna						***Right-of-use assets***
Bangunan	56.184.135	1.687.257	(919.548)	-	56.951.844	*Buildings*
Akumulasi Penyusutan						***Accumulated Depreciation***
Bangunan	19.380.911	12.195.048	(919.548)	-	30.656.411	*Buildings*
Nilai buku bersih	**36.803.224**				**26.295.433**	***Net book value***

15. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *15. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Aset hak-guna (lanjutan) / *Right-of-use assets (continued)*

Aset hak-guna pada 31 Desember 2025 dan 31 Desember 2024 adalah sebagai berikut: (lanjutan)

Rights-of-use assets as of December 31, 2025 and 2024 are as follows: (continued)

	31 Desember/*December 31, 2024*					
	Saldo awal/ ***Beginning balance***	**Penambahan/** ***Additions***	**Pengurangan/** ***Disposals***	**Reklasifikasi/** ***Reclassification***	**Saldo akhir/** ***Ending balance***	
Aset hak-guna						***Right-of-use assets***
Bangunan	61.474.143	2.619.166	(7.909.174)	-	56.184.135	*Buildings*
Akumulasi Penyusutan						***Accumulated Depreciation***
Bangunan	14.724.300	12.565.785	(7.909.174)	-	19.380.911	*Buildings*
Nilai buku bersih	**46.749.843**				**36.803.224**	***Net book value***

Pada tanggal 31 Desember 2025 dan 2024, penyusutan yang tercatat pada Bank adalah sebagai berikut (Catatan 36):

As of December 31, 2025 and 2024, depreciation expense recorded by the Bank as follows (Note 36):

	Untuk tahun yang berakhir pada tanggal 31 Desember/ ***For the year ended December 31,***		
	2025	**2024**	
Penyusutan aset tetap	15.524.552	11.915.636	*Depreciation of fixed asset*
Penyusutan sewa guna usaha	12.195.048	12.565.785	*Depreciation of right-of-use assets*
Jumlah	**27.719.600**	**24.481.421**	***Total***

Laporan posisi keuangan menunjukkan jumlah terkait sewa adalah sebagai berikut:

The balance sheet shows the following amounts relating to leases:

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Aset hak-guna:			*Right-of-use assets:*
- Bangunan	26.295.433	36.803.224	*Buildings -*
	26.295.433	**36.803.224**	
Liabilitas sewa (Catatan 26)	28.688.013	39.811.304	*Lease liabilities (Note 26)*
	28.688.013	**39.811.304**	

Laporan laba rugi menunjukkan jumlah terkait sewa adalah sebagai berikut:

The statement of profit or loss shows the following amounts relating to leases:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ ***For the year ended December 31,***		
	2025	**2024**	
Beban penyusutan	12.195.048	12.565.785	*Depreciation expense*
Beban bunga (Catatan 36)	3.138.264	4.117.817	*Interest expense (Note 36)*
Jumlah	**15.333.312**	**16.683.602**	***Total***

15. ASET TETAP DAN ASET HAK-GUNA (lanjutan) / *15. FIXED ASSETS AND RIGHT-OF-USE ASSETS (continued)*

Revaluasi aset tetap / ***Fixed asset revaluation***

Penilaian kembali atas nilai wajar aset tetap yang dimiliki Bank pada 31 Desember 2024 telah dilakukan oleh Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo dan Rekan dengan laporan penilaian tertanggal 9 Januari 2025 atas aset tetap berupa tanah dan bangunan, serta laporan penilaian tertanggal 16 Januari 2025 atas aset dalam pembangunan berupa tanah dan bangunan di Bali. Laporan penilaian ditandatangani oleh Audrey Angelina, M.Bus., MAPPI (Cert.), penilai independen yang telah terdaftar pada OJK.

Revaluation on fair value of the Bank's fixed assets as of December 31, 2024 was performed by Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo and Partners with valuation report dated January 9, 2025 for fixed assets in forms of land and building, also valuation report dated January 16, 2025 for assets under constructions of land and building in Bali. The valuation report was signed by Audrey Angelina, M.Bus., MAPPI (Cert.), independent appraiser registered in OJK.

Metode penilaian yang digunakan adalah Metode Pendekatan Data Pasar dan Metode Biaya. Data pembanding untuk menentukan nilai wajar aset diperoleh dari data transaksi jual beli dari aset sebanding dengan menyesuaikan perbedaan-perbedaan antara aset yang dinilai dengan data pembanding. Perbandingan ini juga menyangkut berbagai faktor seperti lokasi, luas, bentuk, karakteristik dan kegunaannya berdasarkan unsur waktu dan peruntukannya.

Valuation method used is Market Data Approach and Cost Approach Method. Comparative data to determine fair value asset is obtained from data of sale and purchase transactions from comparable assets by adjusting differences between assets valued and comparable data. This comparison is also concerns factors such as location, size, shape, characteristics and function based on its time and intended used.

16. AGUNAN YANG DIAMBIL ALIH / *16. FORECLOSED ASSETS*

Agunan yang diambil alih untuk penyelesaian pinjaman yang diberikan dicatat dalam akun Agunan yang Diambil Alih ("AYDA"). Rincian dalam akun ini adalah:

Foreclosed assets in settlement of loans are included in Foreclosed assets ("AYDA") account. The details in the account are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Tanah dan bangunan	493.971.536	544.115.286	*Land and building*
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(198.248.541)	(165.131.092)	*Allowance for impairment losses*
	295.722.995	**378.984.194**	

Berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 40/POJK.03/2019 tanggal 19 Desember 2019 tentang "Penilaian Kualitas Aktiva Bank Umum", khususnya agunan yang diambil alih, Bank diwajibkan untuk melakukan upaya penyelesaian terhadap agunan yang diambil alih yang dimiliki.

Based on Financial Service Authority Regulation No. 40/POJK.03/2019 dated December 19, 2019 regarding "Asset Quality Ratings for Commercial Banks" and particularly on the foreclosed assets, the Bank is required to have an action plan for settlement of its foreclosed assets.

Mutasi nilai agunan yang diambil alih adalah sebagai berikut:

The changes in foreclosed assets are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Saldo awal	**544.115.286**	**802.486.682**	***Beginning balance***
Penambahan selama tahun berjalan	38.729.154	72.000.000	*Addition during the year*
Pengurangan selama tahun berjalan	(88.872.904)	(330.371.396)	*Deduction during the year*
Saldo akhir	**493.971.536**	**544.115.286**	***Ending balance***

16. AGUNAN YANG DIAMBIL ALIH (lanjutan) / *16. FORECLOSED ASSETS (continued)*

Mutasi cadangan kerugian penurunan nilai untuk agunan yang diambil alih adalah sebagai berikut:

The changes in allowance for impairment losses of forecosed assets are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Saldo awal	**165.131.092**	**251.870.489**	***Beginning balance***
Penambahan selama tahun berjalan	79.034.277	40.152.866	*Addition during the year*
Pengurangan selama tahun berjalan	(45.916.828)	(126.892.263)	*Deduction during the year*
Saldo akhir	**198.248.541**	**165.131.092**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas agunan yang diambil alih.

Management believes that the allowance for impairment losses is adequate to cover possible losses from foreclosed assets.

17. ASET TAK BERWUJUD / *17. INTANGIBLE ASSETS*

	31 Desember/*December 31, 2025*						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan	29.712.519	7.944.400	-	-	-	37.656.919	*Acquisition Cost*
Dikurangi: Akumulasi amortisasi	(18.613.101)	(5.402.183)	-	-	-	(24.015.284)	*Less: Accumulated amortisation*
Nilai buku	**11.099.418**					**13.641.635**	***Net book value***

	31 Desember/*December 31, 2024*						
	Saldo awal/ *Beginning balance*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Kapitalisasi/ *Capitalisation***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Biaya Perolehan	23.819.348	5.893.171	-	-	-	29.712.519	*Acquisition Cost*
Dikurangi: Akumulasi amortisasi	(15.626.535)	(2.986.566)	-	-	-	(18.613.101)	*Less: Accumulated amortisation*
Nilai buku	**8.192.813**					**11.099.418**	***Net book value***

Aset tak berwujud yang dimiliki oleh Bank berupa lisensi aplikasi yang dibeli oleh Bank.

Intangible assets held by the Bank is application license purchased by the Bank.

Amortisasi yang dicatat oleh Bank masing-masing sebesar Rp5.402.183 dan Rp2.986.566 untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 (Catatan 36).

Amortisation recorded by the Bank amounted to Rp5,402,183 and Rp2,986,566 for the years ended December 31, 2025 and 2024, respectively (Note 36).

Berdasarkan penelaahan manajemen, tidak terdapat kejadian atau perubahan keadaan yang mengindikasikan adanya penurunan nilai aset tak berwujud pada tanggal 31 Desember 2025 dan 2024.

Based on the management assessment, there are no events or changes in circumstances indicating an impairment of intangible assets as of December 31, 2025 and 2024.

18. ASET LAIN-LAIN / *18. OTHER ASSETS*

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Properti terbengkalai	31.148.944	31.148.944	*Abandoned property*
Uang muka pada pihak ketiga	25.125.225	61.950.360	*Advance payment to third parties*
Uang jaminan	6.856.525	6.661.843	*Security deposits*
Tagihan pihak ketiga	4.615.197	5.089.644	*Receivables from third parties*
Lain-lain	72.987.316	77.599.366	*Others*
	140.733.207	**182.450.157**	
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(10.493.682)	(11.336.194)	*Allowance for impairment losses*
Jumlah	**130.239.525**	**171.113.963**	***Total***

Penilaian kembali atas nilai wajar tanah dan bangunan yang dimiliki Bank pada 31 Desember 2024 telah dilakukan oleh Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo dan Rekan dengan laporan penilaian tertanggal 9 Januari 2025 atas tanah dan bangunan termasuk properti terbengkalai. Laporan penilaian ditandatangani oleh Audrey Angelina, M.Bus., MAPPI (Cert.), penilai independen yang telah terdaftar pada OJK.

Revaluation on fair value of the Bank's land and building as of December 31, 2024 was performed by Kantor Jasa Penilai Publik ("KJPP") Jimmy Prasetyo and Partners with valuation report dated January 9, 2025 for land and building included abandoned property. The valuation report was signed by Audrey Angelina, M.Bus., MAPPI (Cert.), independent appraiser registered in OJK.

Selisih penilaian kembali properti terbengkalai tahun 2024 sebesar Rp2.645.626 telah dikreditkan pada pendapatan komprehensif lainnya dan disajikan sebagai "Surplus revaluasi aset tetap" di ekuitas.

The difference in abandoned property revaluation in 2024 amounted to Rp2,645,626 was credited to other comprehensive income and presented as "Gain on revaluation of fixed assets" in equity.

Uang jaminan merupakan uang yang disetor sebagai jaminan untuk sewa gedung kantor.

Security deposits represent deposit pledged as guarantee for building rental.

Lain-lain terutama terdiri dari tagihan transaksi valuta asing, tagihan biaya administrasi dan persediaan barang promosi.

Others mainly consists of foreign exchange transaction, administrative expense transaction and promotion inventories.

Seluruh aset lain-lain pada tanggal 31 Desember 2025 dan 2024 adalah transaksi dengan pihak ketiga.

All other assets as of December 31, 2025 and 2024 are transactions with third parties.

Mutasi cadangan kerugian penurunan nilai untuk aset lain-lain adalah sebagai berikut:

The changes in allowance for impairment losses of other assets are as follows:

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Saldo awal	**11.336.194**	**12.356.770**	***Beginning balance***
Pembalikan selama tahun berjalan	(842.512)	(1.020.576)	*Reversal during the year*
Saldo akhir	**10.493.682**	**11.336.194**	***Ending balance***

Manajemen berpendapat bahwa cadangan kerugian penurunan nilai yang telah dibentuk cukup untuk menutup kemungkinan kerugian atas aset lain-lain.

Management believes that the allowance for impairment losses is adequate to cover possible losses from other assets.

19. SIMPANAN NASABAH / *19. DEPOSITS FROM CUSTOMERS*

Semua simpanan nasabah dalam mata uang Rupiah dan mata uang asing, terdiri dari:

All deposits from customers in Rupiah and foreign currency, consist of:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Negotiable Certificate of Deposit	40.000.000	450.000.000	*Negotiable Certificate of Deposit*
Dikurangi:			*Less*:
Diskonto	(626.612)	(19.840.753)	*Discount*
Beban emisi yang belum diamortisasi	(60.004)	(1.357.493)	*Unamortised issuance cost*
Deposito berjangka	15.976.248.273	15.908.972.247	*Time deposits*
Tabungan	3.775.826.407	3.286.885.846	*Savings deposits*
Giro	3.073.756.220	2.845.040.277	*Demand deposits*
Sub jumlah	22.865.144.284	22.469.700.124	*Sub total*
Mata uang asing			***Foreign currency***
Deposito berjangka	1.152.839.408	792.560.467	*Time deposits*
Giro	276.714.412	69.850.909	*Demand deposits*
Sub jumlah	1.429.553.820	862.411.376	*Sub total*
Jumlah	**24.294.698.104**	**23.332.111.500**	***Total***

Simpanan nasabah dalam mata uang asing adalah Dolar Amerika Serikat, Dolar Singapura, Euro Eropa, Yen Jepang, dan Yuan Cina.

All deposits from customers in foreign currency are denominated in United States Dollar, Singapore Dollar, European Euro, Japanese Yen, and Chinese Yuan.

a. Giro / *a. Demand Deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi (Catatan 42)	158.251.829	209.682.617	*Related parties (Note 42)*
Pihak ketiga	3.192.218.803	2.705.208.569	*Third parties*
Jumlah	**3.350.470.632**	**2.914.891.186**	***Total***

(ii) Berdasarkan mata uang / *(ii) By currency*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	3.073.756.219	2.845.040.277	*Rupiah*
Dolar Amerika Serikat	271.670.081	63.854.041	*United States Dollar*
Yen Jepang	2.803.187	3.652.877	*Japanese Yen*
Euro Eropa	1.128.258	1.623.030	*European Euro*
Dolar Singapura	1.104.424	720.961	*Singapore Dollar*
Yuan Cina	8.463	-	*Chinese Yuan*
Jumlah	**3.350.470.632**	**2.914.891.186**	***Total***

Giro yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp845.919.603 dan Rp680.735.509 (Catatan 11).

Demand deposits amounting to Rp845,919,603 and Rp680,735,509 pledged as collateral or blocked as of December 31, 2025 and 2024, respectively (Note 11).

19. SIMPANAN NASABAH (lanjutan) / *19. DEPOSITS FROM CUSTOMERS (continued)*

b. Tabungan / *b. Savings deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Pihak berelasi (Catatan 42)	27.031.842	33.955.891	*Related parties (Note 42)*
Pihak ketiga	3.748.794.565	3.252.929.955	*Third parties*
Jumlah	**3.775.826.407**	**3.286.885.846**	***Total***

Tabungan yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp290.950.000 dan Rp133.150.000 (Catatan 11).

Saving deposits amounting to Rp290,950,000 and Rp133,150,000 pledged as collateral or blocked as of December 31, 2025 and 2024, respectively (Note 11).

c. Deposito berjangka / *c. Time deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi (Catatan 42)	383.483.571	323.392.414	*Related parties (Note 42)*
Pihak ketiga	16.745.604.110	16.378.140.300	*Third parties*
Jumlah	**17.129.087.681**	**16.701.532.714**	***Total***

(ii) Berdasarkan mata uang / *(ii) By currency*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	15.976.248.273	15.908.972.247	*Rupiah*
Dolar Amerika Serikat	1.152.839.408	792.560.467	*United States Dollar*
Jumlah	**17.129.087.681**	**16.701.532.714**	***Total***

(iii) Berdasarkan periode / *(iii) By period*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
1 bulan	5.762.617.170	6.738.282.288	*1 month*
3 bulan	6.376.505.342	5.460.370.322	*3 months*
6 bulan	3.284.055.620	3.093.120.546	*6 months*
12 bulan	1.705.909.549	1.409.759.558	*12 months*
Jumlah	**17.129.087.681**	**16.701.532.714**	***Total***

(iv) Berdasarkan sisa umur sampai dengan jatuh tempo / *(iv) By remaining period until maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 bulan	7.860.124.744	8.877.238.912	*Less than 1 month*
1 sampai dengan 3 bulan	6.141.372.092	4.957.707.565	*1 up to 3 months*
3 sampai dengan 6 bulan	2.133.349.806	2.105.498.658	*3 up to 6 months*
6 sampai dengan 12 bulan	994.241.039	761.087.579	*6 up to 12 months*
Jumlah	**17.129.087.681**	**16.701.532.714**	***Total***

19. SIMPANAN NASABAH (lanjutan) / *19. DEPOSITS FROM CUSTOMERS (continued)*

c. Deposito berjangka (lanjutan) / *c. Time deposits (continued)*

Deposito berjangka yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing adalah sebesar Rp1.047.337.799 dan Rp1.116.894.988 (Catatan 11).

Time deposits which are pledged as collateral on loans as of December 31, 2025 and 2024 amounted to Rp1,047,337,799 and Rp1,116,894,988 respectively (Note 11).

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 47.

Informations respect to interest rate are disclosed in Note 47.

d. *Negotiable Certificate of Deposit* / *d. Negotiable Certificate of Deposit*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi (Catatan 42)			***Related parties (Note 42)***
Negotiable Certificate of Deposit	6.500.000	109.900.000	*Negotiable Certificate of Deposit*
Dikurangi:			*Less*:
Diskonto	(101.824)	(4.657.140)	*Discount*
Beban emisi yang belum diamortisasi	(9.751)	(323.343)	*Unamortised issuance cost*
Sub jumlah	6.388.425	104.919.517	*Sub total*
Pihak ketiga			***Third parties***
Negotiable Certificate of Deposit	33.500.000	340.100.000	*Negotiable Certificate of Deposit*
Dikurangi:			*Less*:
Diskonto	(524.788)	(15.183.613)	*Discount*
Beban emisi yang belum diamortisasi	(50.253)	(1.034.150)	*Unamortised issuance cost*
Sub jumlah	32.924.959	323.882.237	*Sub total*
Jumlah	**39.313.384**	**428.801.754**	***Total***

Bank melakukan penerbitan *Negotiable Certificate of Deposit* (NCD) pada tanggal 5 September 2023 sebesar Rp440.000.000 yang terbagi dua seri, yaitu seri A dengan nilai sebesar Rp50.000.000 dengan suku bunga 6,5% dan jatuh tempo pada tanggal 5 September 2025 dan seri B dengan nilai sebesar Rp390.000.000 dengan suku bunga 7% dan jatuh tempo pada tanggal 5 September 2025.

The Bank issues a Negotiable Certificate of Deposit (NCD) on September 5, 2023, amounting to Rp440,000,000 which is divided into two series, namely series A with a value of Rp50,000,000 with an interest rate of 6.5% and due on September 5, 2025 and series B with a value of Rp390,000,000 with an interest rate of 7% and due on September 5, 2025.

Bank melakukan penerbitan *Negotiable Certificate of Deposit* (NCD) pada tanggal 3 April 2024 sebesar Rp110.000.000 yang terbagi dua seri, yaitu seri A dengan nilai sebesar Rp70.000.000 dengan suku bunga 6,5% dan jatuh tempo pada tanggal 3 April 2025 dan seri B dengan nilai sebesar Rp40.000.000 dengan suku bunga 7% dan jatuh tempo pada tanggal 3 April 2026.

The bank issues a Negotiable Certificate of Deposit (NCD) on April 3, 2024, amounting to Rp110,000,000 which is divided into two series, namely series A with a value of Rp70,000,000 with an interest rate of 6.5% and due on April 3, 2025 and series B with a value of Rp40,000,000 with an interest rate of 7% and due on April 3, 2026.

Negotiable Certificate of Deposit (NCD) yang dijadikan sebagai jaminan tunai atas pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp5.500.000 dan Rp131.000.000 (Catatan 11).

Negotiable Certificate of Deposit (NCD) which are pledged as collateral on loans as of December 31, 2025 and 2024 amounted to Rp5,500,000 and Rp131,000,000 respectively (Note 11).

20. SIMPANAN DARI BANK LAIN / *20. DEPOSITS FROM OTHER BANKS*

Semua simpanan dari bank lain adalah dalam mata uang Rupiah dan terdiri dari:

All deposits from other banks are denominated in Rupiah and consist of:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Call money	1.490.000.000	205.000.000	*Call money*
Giro	683.893.315	210.458.618	*Demand deposits*
Deposito berjangka	299.089.541	72.552.541	*Time deposits*
Tabungan	107.577.294	49.008.271	*Savings deposits*
Negotiable Certificate of Deposit	-	50.000.000	*Negotiable Certificate of Deposit*
Dikurangi:			*Less:*
Diskonto	-	(820.857)	*Discount*
Beban emisi yang belum diamortisasi	-	(180.601)	*Unamortised issuance cost*
Deposito *on call*	-	5.000.000	*Deposits on call*
Jumlah	**2.580.560.150**	**591.017.972**	***Total***

a. *Call money*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			***Third parties***
PT Bank Pan Indonesia Tbk	600.000.000	-	*PT Bank Pan Indonesia Tbk*
PT Bank Sinarmas Tbk	265.000.000	50.000.000	*PT Bank Sinarmas Tbk*
PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta	200.000.000	75.000.000	*PT Bank Pembangunan Daerah Daerah Istimewa Yogyakarta*
PT Bank Pembangunan Daerah Maluku	150.000.000	-	*PT Bank Pembangunan Daerah Maluku*
PT Bank Pembangunan Daerah Kalimantan Timur dan Kalimantan Utara	95.000.000	-	*PT Bank Pembangunan Daerah Kalimantan Timur dan Kalimantan Utara*
PT Bank SBI Indonesia	50.000.000	-	*PT Bank SBI Indonesia*
PT Bank Ina Perdana Tbk	50.000.000	-	*PT Bank Ina Perdana Tbk*
PT Bank Pembangunan Daerah Jawa Tengah Tbk	50.000.000	50.000.000	*PT Bank Pembangunan Daerah Jawa Tengah Tbk*
PT Bank Multiarta Sentosa Tbk	30.000.000	30.000.000	*PT Bank Multiarta Sentosa Tbk*
Jumlah	**1.490.000.000**	**205.000.000**	***Total***

(ii) Berdasarkan periode / *(ii) By period*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 bulan	1.490.000.000	205.000.000	*Less than 1 month*
Jumlah	**1.490.000.000**	**205.000.000**	***Total***

b. Deposito berjangka / *b. Time deposits*

(i) Berdasarkan pihak lawan / *(i) By counterparties*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga	299.089.541	72.552.541	*Third parties*

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat saldo deposito dari pihak berelasi.

As of December 31, 2025 and 2024 there are no deposits account from related parties.

20. SIMPANAN DARI BANK LAIN (lanjutan) / *20. DEPOSITS FROM OTHER BANKS (continued)*

b. Deposito berjangka (lanjutan) / *b. Time deposits (continued)*

(ii) Berdasarkan periode / *(ii) By period*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
1 bulan	226.589.541	26.552.541	*1 month*
3 bulan	59.500.000	29.500.000	*3 months*
6 bulan	3.000.000	3.000.000	*6 months*
12 bulan	10.000.000	13.500.000	*12 months*
Jumlah	**299.089.541**	**72.552.541**	***Total***

(iii) Berdasarkan sisa umur sampai dengan jatuh tempo / *(iii) By remaining period until maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 bulan	284.589.541	27.552.541	*Less than 1 month*
1 sampai dengan 3 bulan	5.500.000	28.500.000	*1 up to 3 months*
3 sampai dengan 6 bulan	7.000.000	8.000.000	*3 up to 6 months*
6 sampai dengan 12 bulan	2.000.000	8.500.000	*6 up to 12 months*
Jumlah	**299.089.541**	**72.552.541**	***Total***

c. Giro / *c. Demand deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi (Catatan 42)	-	532.305	*Related parties (Note 40)*
Pihak ketiga	683.893.315	209.926.313	*Third parties*
Jumlah	**683.893.315**	**210.458.618**	***Total***

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 47.

Informations in respect to interest rates are disclosed in Note 47.

d. Tabungan / *d. Saving deposits*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga	107.577.294	49.008.271	*Third parties*

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat saldo tabungan dari pihak berelasi.

As of December 31, 2025 and 2024 there are no saving deposits from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 47.

Informations in respect to interest rates are disclosed in Note 47.

20. SIMPANAN DARI BANK LAIN (lanjutan) / *20. DEPOSITS FROM OTHER BANKS (continued)*

e. Deposito *on call* / *e. Deposits on call*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga	-	5.000.000	*Third parties*

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat saldo deposito *on call* dari pihak berelasi.

As of December 31, 2025 and 2024 there are no deposits on call from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 47.

Informations in respect to interest rates are disclosed in Note 47.

f. *Negotiable Certificate of Deposit* / *f. Negotiable Certificate of Deposit*

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			***Third parties***
Negotiable Certificate of Deposit	-	50.000.000	*Negotiable Certificate of Deposit*
Dikurangi:			*Less*:
Diskonto	-	(820.857)	*Discount*
Beban emisi yang belum diamortisasi	-	(180.601)	*Unamortised issuance cost*
Jumlah	**-**	**48.998.542**	***Total***

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat saldo *Negotiable Certificate of Deposit* (NCD) dari pihak berelasi.

As of December 31, 2025 and 2024 there are no Negotiable Certificate of Deposit (NCD) from related parties.

Informasi mengenai tingkat suku bunga diungkapkan pada Catatan 47.

Informations in respect to interest rates are disclosed in Note 47.

21. EFEK-EFEK YANG DIJUAL DENGAN JANJI DIBELI KEMBALI

Efek-efek yang dijual dengan janji dibeli kembali pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

21. SECURITIES SOLD UNDER REPURCHASED AGREEMENTS

The securities sold under repurchased agreements as of December 31, 2025 and 2024 are as follows:

31 Desember / *December 31, 2025*

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai wajar/ *Fair value amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank Mega	FR0059	150.000.000	4,85%	22 Desember/ *December* 2025	5 Januari/ *January 2026*	147.563.250
Bank Mega	FR0059	100.000.000	4,85%	23 Desember/ *December* 2025	6 Januari/ *January 2026*	98.381.800
Bank PAN Indonesia	FR0059	150.000.000	4,90%	29 Desember/ *December* 2025	5 Januari/ *January 2026*	147.728.455
Bank PAN Indonesia	FR0059	150.000.000	4,90%	29 Desember/ *December* 2025	5 Januari/ January *2026*	147.728.455
Bank Mega	FR0059	50.000.000	4,85%	30 Desember/ *December* 2025	13 Januari/ *January 2026*	49.253.162
Bank JTRUST Indonesia	FR0056	100.000.000	4,75%	30 Desember/ *December* 2025	7 Januari/ *January 2026*	102.914.098
Jumlah/ *Total*		**700.000.000**				**693.569.220**

31 Desember / *December 31, 2024*

Pihak lawan/ *Counterparty*	Jenis efek/ *Type of Securities*	Nilai Nominal/ *Notional amount*	Tingkat suku bunga/ *Interest rate*	Tanggal dimulai/ *Commencement date*	Tanggal jatuh tempo/ *Maturity date*	Nilai tercatat/ *Carrying amount*
Bank BRI	FR0059	100.000.000	6,55%	4 Desember/ *December* 2024	2 Januari/ *January 2025*	95.919.400
Bank BRI	FR0059	100.000.000	6,55%	4 Desember/ *December* 2024	2 Januari/ *January 2025*	95.919.400
Bank BRI	FR0081	100.000.000	6,55%	9 Desember/ *December* 2024	6 Januari/ *January 2025*	101.024.400
Bank BRI	FR0081	100.000.000	6,55%	9 Desember/ *December* 2024	6 Januari/ *January 2025*	101.024.400
Bank BRI	FR0059	100.000.000	6,55%	10 Desember/ *December* 2024	7 Januari/ *January 2025*	95.718.400
Bank BNI	FR0081	100.000.000	6,65%	20 Desember/ *December* 2024	20 Januari/ *January 2025*	97.869.014
Jumlah/*Total*		**600.000.000**				**587.475.014**

22. EFEK-EFEK YANG DITERBITKAN / *22. SECURITIES ISSUED*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Obligasi Subordinasi Berkelanjutan I Bank Victoria Tahap II Tahun 2018	-	350.000.000	*Bank Victoria Subordinated Continuing Bonds I Phase II Year 2018*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019	250.000.000	250.000.000	*Bank Victoria Subordinated Continuing Bonds II Phase I Year 2019*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019	150.000.000	150.000.000	*Bank Victoria Subordinated Continuing Bonds II Phase II Year 2019*
Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020	60.000.000	60.000.000	*Bank Victoria Subordinated Continuing Bonds II Phase III Year 2020*
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri A	300.000.000	300.000.000	*Bank Victoria Continuing Bonds III Phase I Year 2023 Series A*
Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 Seri B	200.000.000	200.000.000	*Bank Victoria Continuing Bonds III Phase I Year 2023 Series B*
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024	500.000.000	500.000.000	*Bank Victoria Subordinated Continuing Bonds III Phase I Year 2024*
Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024	500.000.000	500.000.000	*Bank Victoria Continuing Bonds III Phase II Year 2024*
Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025	500.000.000	-	*Bank Victoria Subordinated Continuing Bonds III Phase II Year 2025*
Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025	750.000.000	-	*Bank Victoria Continuing Bonds IV Phase I Year 2025*
Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025	750.000.000	-	*Bank Victoria Continuing Bonds IV Phase II Year 2025*
Jumlah	**3.960.000.000**	**2.310.000.000**	***Total***
Dikurangi: Biaya emisi yang belum diamortisasi	(37.618.861)	(20.587.351)	*Less: Unamortised issuance cost*
Jumlah - bersih	**3.922.381.139**	**2.289.412.649**	***Total - net***

Berdasarkan pihak lawan / ***By counterparties***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi (Catatan 42)	538.660.000	147.885.000	*Related parties (Note 42)*
Pihak ketiga	3.421.340.000	2.162.115.000	*Third parties*
Jumlah	**3.960.000.000**	**2.310.000.000**	***Total***
Dikurangi: Biaya emisi yang belum diamortisasi	(37.618.861)	(20.587.351)	*Less: Unamortised issuance cost*
Jumlah - bersih	**3.922.381.139**	**2.289.412.649**	***Total - net***

Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025

Pada tanggal 26 September 2025 Bank menerbitkan Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 dengan jumlah pokok sebanyak-banyaknya sebesar Rp750.000.000.

Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 memiliki tingkat suku bunga tetap sebesar 8,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi pertama dilakukan pada tanggal 29 Desember 2025, sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi yaitu pada tanggal 26 September 2028.

Bank Victoria Continuing Bonds IV Phase II Year 2025

On September 26, 2025, the Bank issued Bank Victoria Continuing Bonds IV Phase II Year 2025 with a principal amount up to Rp750,000,000.

Bank Victoria Continuing Bonds IV Phase II Year 2025 has fixed rate of 8.25% per annum, and the interest will be paid every 3 (three) months starting from December 29, 2025 for the first payment whereas the last payment will be on September 26, 2028 at the maturity date of the Bond.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan IV Bank Victoria Tahap II Tahun 2025 (lanjutan)

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-341/PEF-DIR/III/2025 tanggal 17 Maret 2025 perihal Sertifikat Obligasi Berkelanjutan IV PT Bank Victoria International Tbk periode 14 Maret 2025 sampai dengan 1 Maret 2026, hasil pemeringkatan Obligasi adalah idA-.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2025.

Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025

Pada tanggal 04 Juli 2025 Bank menerbitkan Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 dengan jumlah pokok sebanyak-banyaknya sebesar Rp750.000.000.

Obligasi Berkelanjutan IV Bank Victoria Tahap I Tahun 2025 memiliki tingkat suku bunga tetap sebesar 9,00% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi pertama dilakukan pada tanggal 6 Oktober 2025, sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi yaitu pada tanggal 4 Juli 2028.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-341/PEF-DIR/III/2025 tanggal 17 Maret 2025 perihal Sertifikat Obligasi Berkelanjutan IV PT Bank Victoria International Tbk periode 14 Maret 2025 sampai dengan 1 Maret 2026, hasil pemeringkatan Obligasi adalah idA-.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak Terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi pada tanggal 31 Desember 2025.

22. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds IV Phase II Year 2025 (continued)

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-341/PEF-DIR/III/2025 dated March 17, 2025 regarding a Rating Certificate for Continuous Bond IV of PT Bank Victoria International Tbk from March 14, 2025 to March 1, 2026, the rating results of the Bonds are idA-.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025.

Bank Victoria Continuing Bonds IV Phase I Year 2025

On July 04, 2025, the Bank issued Bank Victoria Continuing Bonds IV Phase I Year 2025 with a principal amount up to Rp750,000,000.

Bank Victoria Continuing Bonds IV Phase I Year 2025 has fixed rate of 9.00% per annum, and the interest will be paid every 3 (three) months starting from October 06, 2025 for the first payment whereas the last payment will be on July 4, 2028 at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-341/PEF-DIR/III/2025 dated March 17, 2025 regarding a Rating Certificate for Continuous Bond IV of PT Bank Victoria International Tbk from March 14, 2025 to March 1, 2026, the rating results of the Bonds are idA-.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025

Pada tanggal 18 Juni 2025 Bank menerbitkan Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 dengan jumlah pokok sebanyak-banyaknya sebesar Rp500.000.000.

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap II Tahun 2025 memiliki tingkat suku bunga tetap sebesar 10,00% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 18 September 2025, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 18 Juni 2030.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-341/PEF-DIR/III/2025 tanggal 17 Maret 2025 perihal Sertifikat Obligasi Subordinasi Berkelanjutan III PT Bank Victoria International Tbk periode 14 Maret 2025 sampai dengan 1 Maret 2026, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi pada tanggal 31 Desember 2025.

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024

Pada tanggal 12 Juli 2024 Bank menerbitkan Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 dengan jumlah pokok sebanyak-banyaknya sebesar Rp500.000.000.

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 memiliki tingkat suku bunga tetap sebesar 10,75% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 12 Oktober 2024, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 12 Juli 2029.

22. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Continuing Bonds III Phase II Year 2025

On June 18, 2025, the Bank issued Bank Victoria Subordinated Continuing Bonds III Phase II Year 2025 with a principal amount up to Rp500,000,000.

Bank Victoria Subordinated Continuing Bonds III Phase II Year 2025 has fixed rate of 10.00% per annum, and the interest will be paid every 3 (three) months starting from September 18, 2025 for the first payment whereas the last payment will be on June 18, 2030 at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-341/PEF-DIR/III/2025 dated March 17, 2025 regarding a Rating Certificate for Continuous Subordinated Bond III of PT Bank Victoria International Tbk from March 14, 2025 to March 1, 2026, the rating results of the Continuous Bonds are idBBB.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025.

Bank Victoria Subordinated Continuing Bonds III Phase I Year 2024

On July 12, 2024, the Bank issued Bank Victoria Subordinated Continuing Bonds III Phase I Year 2024 with a principal amount up to Rp500,000,000.

Bank Victoria Subordinated Continuing Bonds III Phase I Year 2024 has fixed rate of 10.75% per annum, and the interest will be paid every 3 (three) months starting from October 12, 2024 for the first payment whereas the last payment will be on July 12, 2029 at the maturity date of the Bond.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 (lanjutan)

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-368/PEF-DIR/IV/2024 tanggal 2 April 2024 perihal Sertifikat Obligasi Subordinasi Berkelanjutan III PT Bank Victoria International Tbk periode 2 April 2024 sampai dengan 1 April 2025, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Pada tanggal 31 Desember 2025 dan 2024, peringkat Obligasi Subordinasi Berkelanjutan III Bank Victoria Tahap I Tahun 2024 menurut Pefindo adalah idBBB.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2025 dan 2024.

Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024

Pada tanggal 12 Juli 2024 Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 dengan jumlah pokok sebanyak-banyaknya sebesar Rp500.000.000.

Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 memiliki tingkat suku bunga tetap sebesar 9,50% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi pertama dilakukan pada tanggal 12 Oktober 2024, sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi yaitu pada tanggal 12 Juli 2027.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No.RC-368/PEF-DIR/IV/2024 tanggal 2 April 2024 perihal Sertifikat Obligasi Subordinasi Berkelanjutan III PT Bank Victoria International Tbk periode 2 April 2024 sampai dengan 1 April 2025, hasil pemeringkatan Obligasi adalah idA-.

Pada tanggal 31 Desember 2025 dan 2024, peringkat Obligasi Berkelanjutan III Bank Victoria Tahap II Tahun 2024 menurut Pefindo adalah idA-.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2025.

22. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Continuing Bonds III Phase I Year 2024 (continued)

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-368/PEF-DIR/IV/2024 dated April 2, 2024 regarding a Rating Certificate for Continuous Subordinated Bond III of PT Bank Victoria International Tbk from April 2, 2024 to April 1, 2025, the rating results of the Subordinated Bonds are idBBB.

As of December 31, 2025 and 2024, the rating of the Bank Victoria Subordinated Continuing Bonds III Phase I Year 2024 based on Pefindo was idBBB.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025 and 2024.

Bank Victoria Continuing Bonds III Phase II Year 2024

On July 12, 2024, the Bank issued Bank Victoria Continuing Bonds III Phase II Year 2024 with a principal amount up to Rp500,000,000.

Bank Victoria Continuing Bonds III Phase II Year 2024 has fixed rate of 9.50% per annum, and the interest will be paid every 3 (three) months starting from October 12, 2024 for the first payment whereas the last payment will be on July 12, 2027 at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No.RC-368/PEF-DIR/IV/2024 dated April 2, 2024 regarding a Rating Certificate for Continuous Subordinated Bond III of PT Bank Victoria International Tbk from April 2, 2024 to April 1, 2025, the rating results of the Bonds are idA-.

As of December 31, 2025 and 2024, the rating of the Bank Victoria Continuing Bonds III Phase II Year 2024 based on Pefindo was idA-.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023

Pada tanggal 10 Maret 2023, Bank menerbitkan Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 sebesar Rp500.000.000.

Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 terdiri dari 2 (dua) seri Obligasi, yaitu sebagai berikut:

- Seri A dengan jumlah Pokok Obligasi sebesar Rp300.000.000 dengan tingkat suku bunga tetap sebesar 9,25% per tahun, berjangka waktu 3 (tiga) tahun sejak Tanggal Emisi.
- Seri B dengan jumlah Pokok Obligasi sebesar Rp200.000.000 dengan tingkat bunga tetap sebesar 10,25% per tahun, berjangka waktu 5 (lima) tahun sejak Tanggal Emisi.

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali. Pembayaran bunga obligasi pertama dilakukan pada tanggal 9 Juni 2023 sedangkan pembayaran bunga Obligasi terakhir akan dilakukan pada tanggal jatuh tempo masing-masing seri Obligasi yaitu pada tanggal 9 Maret 2026 untuk Obligasi Seri A dan 9 Maret 2028 untuk Obligasi Seri B.

Berdasarkan pemeringkatan yang dilaksanakan oleh Pefindo sesuai dengan Surat No.RC-1230/PEF-DIR/XII/2022 tanggal 26 Desember 2022 tentang Sertifikat Pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahun 2023 periode 26 Desember 2022 sampai dengan 1 Desember 2023, hasil pemeringkatan atas Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 adalah idA-.

Pada tanggal 31 Desember 2025 dan 2024, peringkat Obligasi Berkelanjutan III Bank Victoria Tahap I Tahun 2023 menurut Pefindo adalah idA-.

Obligasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2025 dan 2024.

22. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds III Phase I Year 2023

On March 10, 2023, the Bank issued Bank Victoria Continuing Bonds III Phase I Year 2023 amounting to Rp500,000,000.

Bank Victoria Continuing Bonds III Phase I Year 2023 consists of 2 (two) series of Bonds:

- *Series A amounted to Rp300,000,000 with fixed rate of 9.25% per annum, tenor 3 (three) years since Emission Date.*
- *Series B amounted to Rp200,000,000 with fixed rate of 10.25% per annum, tenor 5 (five) years since Emission Date.*

Interest of the bond paid every 3 (three) months starting from June 9, 2023 for the first payment whereas the last payment will be at the maturity date of each Bonds, which on March 9, 2026 for Bonds Series A and on March 9, 2028 for Bonds Series B.

Based on the ranking carried out by Pefindo in accordance with Letter No.RC-1230/PEF-DIR/XII/2022 dated December 26, 2022, regarding the Rating Certificate for the third phase of Bank Victoria Continuing Bonds Year 2023, for the period of December 26, 2022, to December 1, 2023, the result of the ranking for the first phase of Bank Victoria Continuing Bonds III for 2023 is idA-.

As of December 31, 2025 and 2024, the rating of the Bank Victoria Continuing Bonds III Phase I Year 2023 based on Pefindo was idA-.

The above bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk.

There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025 and 2024.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020

Pada tanggal 13 Maret 2020 Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 dengan jumlah pokok sebanyak-banyaknya sebesar Rp60.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 1 Juli 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 1 April 2027.

Berdasarkan hasil pemeringkatan surat utang jangka panjang sesuai dengan surat PT Pemeringkat Efek Indonesia (Pefindo) No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 tentang Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II dari PT Bank Victoria International Tbk sejak 4 April 2019 sampai dengan 1 April 2020, serta konfirmasi sesuai dengan surat Pefindo No. RTG-020/PEF-DIR/II/2020 tanggal 4 Februari 2020 perihal Sertifikat Pemeringkatan Obligasi Subordinasi Berkelanjutan II Tahap III yang diterbitkan melalui rencana Penawaran Umum Berkelanjutan PUB, hasil pemeringkatan Obligasi Subordinasi adalah idBBB.

Pada tanggal 31 Desember 2025 dan 2024, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap III Tahun 2020 menurut Pefindo adalah idBBB.

Obligasi subordinasi di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2025 dan 2024.

22. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Continuing Bonds II Phase III Year 2020

On March 13, 2020, the Bank issued Bank Victoria Subordinated Continuing Bonds II Phase III Year 2020 with a principal amount up to Rp60,000,000.

Bank Victoria Subordinated Continuing Bonds II Phase III Year 2020 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from July 1, 2020 for the first payment whereas the last payment will be on April 1, 2027, at the maturity date of the Bond.

Based on the results of the rating for long-term debt securities in accordance with PT Pemeringkat Efek Indonesia (Pefindo) letter No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 regarding a Rating Certificate for Continuous Subordinated Bond II of PT Bank Victoria International Tbk from April 4, 2019 to April 1, 2020, as well as the confirmation according to Pefindo letter No. RTG-020/PEF-DIR/II/2020 dated February 4, 2020 regarding the Rating Certificate for Continuous Subordinated Bonds II Phase III issued through the PUB Continuous Public Offering plan, the rating results of the Subordinated Bonds are idBBB.

As of December 31, 2025 and 2024, the rating of the Bank Victoria Subordinated Bonds II Phase III Year 2020 based on Pefindo was idBBB.

The subordinated bonds is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of bonds and subordinated bonds trusteeship agreement as of December 31, 2025 and 2024.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019

Pada tanggal 8 November 2019, Bank menerbitkan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 sebesar Rp150.000.000.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,25% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran bunga Obligasi Subordinasi pertama dilakukan pada tanggal 8 Februari 2020, sedangkan pembayaran bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 8 November 2026.

Berdasarkan Surat Keterangan PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 tanggal 26 September 2019 berlaku peringkat sebagaimana tercantum pada Sertifikat Pemeringkatan PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019 yaitu peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019.

Pada tanggal 31 Desember 2025 dan 2024, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap II Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi subordinasi ini adalah PT Bank Mega Tbk. Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi subordinasi pada tanggal 31 Desember 2025 dan 2024.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019

Pada tanggal 28 September 2019, Bank menerbitkan Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 masing-masing sebesar Rp100.000.000 dan Rp250.000.000.

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 diterbitkan dengan tingkat suku bunga tetap sebesar 9,75% per tahun, berjangka waktu 2 (dua) tahun sejak Tanggal Emisi.

22. SECURITIES ISSUED (continued)

Bank Victoria Subordinated Continuing Bonds II Phase II Year 2019

On November 8, 2019, the Bank issued Bank Victoria Subordinated Continuing Bonds II Phase II Year 2019 amounting Rp150,000,000.

Bank Victoria Subordinated Continuing Bonds II Phase II Year 2019 has fixed rate of 11.25% per annum, and the interest will be paid every 3 (three) months starting from February 8, 2020 for the first payment whereas the last payment will be on November 8, 2026, at the maturity date of the Bond.

Based on the letter issued by PT Pemeringkat Efek Indonesia ("Pefindo") No. RTG-129/PEF-DIR/IX/2019 dated September 26, 2019 apply rating as stated on Rating Certificate PT Pemeringkat Efek Indonesia No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019 which was idBBB on Bank Victoria Subordinated Bonds II Phase II Year 2019.

As of Desember 31, 2025 and December 31, 2024, the rating of the Bank Victoria Subordinated Bonds II Phase II Year 2019 based on Pefindo was idBBB.

The above bond is unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bond issuance is PT Bank Mega Tbk. There was no violation to the covenant of the subordinated bonds trusteeship agreement as of December 31, 2025 and 2024.

Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Continuing Bonds II Phase I Year 2019

On September 28, 2019, the Bank issued Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Continuing Bonds II Phase I Year 2019 amounting to Rp100,000,000 and Rp250,000,000, respectively.

Bank Victoria Continuing Bonds II Phase I Year 2019 issued with fixed rate of 9.75% per annum, with tenor 2 (two) years since Emission Date.

22. EFEK-EFEK YANG DITERBITKAN (lanjutan)

Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 dan Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 (lanjutan)

Bunga obligasi dibayarkan setiap 3 (tiga) bulan sekali terhitung sejak Tanggal Emisi. Pembayaran Bunga Obligasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga obligasi terakhir akan dilakukan pada tanggal jatuh tempo obligasi yaitu pada tanggal 28 September 2021.

Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 memiliki tingkat suku bunga tetap sebesar 11,75% per tahun yang akan dibayarkan setiap 3 (tiga) bulan. Pembayaran Bunga Obligasi Subordinasi pertama dilakukan pada tanggal 28 September 2019, sedangkan pembayaran Bunga Obligasi Subordinasi terakhir akan dilakukan pada tanggal jatuh tempo Obligasi Subordinasi yaitu pada tanggal 28 Juni 2026.

Berdasarkan Sertifikat Pemeringkatan Pefindo No. RC-328/PEF-DIR/IV/2019 dan No. RC-329/PEF-DIR/IV/2019 tanggal 4 April 2019, memutuskan memberikan peringkat idA- terhadap Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 serta memberikan peringkat idBBB pada Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019.

Pada tanggal 31 Maret 2021, peringkat Obligasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idA-.

Pada tanggal 31 Desember 2025 dan 2024, peringkat Obligasi Subordinasi Berkelanjutan II Bank Victoria Tahap I Tahun 2019 menurut Pefindo adalah idBBB.

Obligasi dan obligasi subordinasi tersebut di atas tidak dijamin dengan suatu agunan khusus dan tidak dijamin oleh pihak ketiga manapun dan tidak termasuk dalam Program Jaminan Pemerintah Terhadap Liabilitas Pembayaran Bank Umum.

Selaku Wali Amanat dari penerbitan obligasi dan obligasi subordinasi ini adalah PT Bank Mega Tbk.

Tidak terdapat pelanggaran atas pembatasan perjanjian perwaliamanatan obligasi dan obligasi subordinasi pada tanggal 31 Desember 2025 dan 2024.

22. SECURITIES ISSUED (continued)

Bank Victoria Continuing Bonds II Phase I Year 2019 and Subordinated Continuing Bonds II Phase I Year 2019 (continued)

Interest on the bonds will be paid every 3 (three) months starting from Emission Date. The first payment was on September 28, 2019 whereas the last payment will be on September 28, 2021, at the maturity date of the Bond.

Bank Victoria Subordinated Bonds II Phase I Year 2019 has fixed rate of 11.75% per annum, and the interest will be paid every 3 (three) months. The first payment was on September 28, 2019, whereas the last payment will be on June 28, 2026, at the maturity date of the Bond.

Based on the report issued by Pefindo No. RC-328/PEF-DIR/IV/2019 and No. RC-329/PEF-DIR/IV/2019 dated April 4, 2019, the rating of Bank Victoria Continuing Bonds II Phase I Year 2019 is idA-, and the rating of Subordinated Bonds II Phase I Year 2019 is idBBB.

As of March 31, 2021, the rating of the Bank Victoria Continuing Bonds II Phase I Year 2019 based on Pefindo was idA-.

As of December 31, 2025 and 2024, the rating of the Bank Victoria Subordinated Bonds II Phase I Year 2019 based on Pefindo was idBBB.

The above bonds and subordinated bonds are unsecured by a specific collateral and by third parties and are excluded from the Government Guarantee to Certain Liabilities of Commercial Banks Program.

The Trustee of the bonds and subordinated bonds issuance is PT Bank Mega Tbk.

There was no violation to the covenant of the bonds and subordinated bonds trusteeship agreement as of December 31, 2025 and 2024.

23. LIABILITAS AKSEPTASI / *23. ACCEPTANCES PAYABLE*

Rincian liabilitas akseptasi kepada nasabah adalah sebagai berikut:

The details of acceptances payable from customers are as follows:

a. Berdasarkan mata uang / *a. By currency*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Tagihan kepada debitur			*Receivables from debtors*
Pihak ketiga	11.308.073	5.356.946	*Third parties*
Sub jumlah	11.308.073	5.356.946	***Sub total***
Mata Uang Asing			***Foreign Currency***
Tagihan kepada debitur			*Receivables from debtors*
Pihak ketiga	9.983.298	11.648.080	*Third parties*
Jumlah	**21.291.371**	**17.005.026**	***Total***

b. Berdasarkan tenor jatuh tempo / *b. By period maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
1 sampai 3 bulan	3.450.666	2.294.831	*1 up to 3 months*
3 sampai 6 bulan	7.857.407	3.062.115	*3 up to 6 months*
Sub jumlah	11.308.073	5.356.946	***Sub total***
Mata Uang Asing			***Foreign Currency***
1 sampai 6 bulan	9.983.298	-	*1 up to 3 months*
3 sampai 6 bulan	-	11.648.080	*3 up to 6 months*
Jumlah	**21.291.371**	**17.005.026**	***Total***

24. PERPAJAKAN / *24. TAXATION*

a. Utang pajak / *a. Taxes payable*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pasal 4 ayat 2	26.624.382	24.531.464	*Article 4 (2)*
Pasal 21	2.509.655	1.750.164	*Article 21*
Pasal 23	139.315	41.752	*Article 23*
Pasal 26	92.191	51.727	*Article 26*
Pajak Pertambahan Nilai	58.467	76.872	*Value Added Tax*
Jumlah utang pajak	**29.424.010**	**26.451.979**	***Total taxes payable***

b. Beban Pajak Penghasilan / *b. Deferred Tax Expense*

Beban pajak penghasilan terdiri dari: / *Deferred tax expense consist of:*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pajak kini	-	-	*Current tax*
Pajak tangguhan	30.608.688	30.800.886	*Deferred tax*
Jumlah beban pajak penghasilan	**30.608.688**	**30.800.886**	***Total deferred tax expense***

24. PERPAJAKAN (lanjutan) / *24. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

Rekonsiliasi antara laba sebelum pajak penghasilan menurut laporan laba rugi dan penghasilan komprehensif lain dengan taksiran rugi kena pajak adalah sebagai berikut:

The reconciliation between profit before income tax as shown in the statement of profit or loss and other comprehensive income with estimated taxable loss are as follows:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Laba sebelum pajak penghasilan	162.353.615	148.660.124	*Profit before income tax*
Beda waktu:			***Timing differences:***
Imbalan pasca kerja	1.784.255	3.385.166	*Post-employment benefits*
Cadangan bonus, jasa profesional dan promosi	(697.479)	(2.674.515)	*Accrue bonuses, professional fees and promotion expenses*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	99.133.578	(434.280.087)	*Provision for impairment losses on financial and non-financial assets*
Jumlah beda waktu	**100.220.354**	**(433.569.436)**	***Total timing differences***
Beda tetap:			***Permanent differences:***
Biaya pajak	1.310.606	1.009.981	*Tax expenses*
Biaya pemasaran	11.038.332	8.209.700	*Marketing expenses*
Tunjangan karyawan	2.714.596	2.487.845	*Employee's allowances*
Sumbangan	34.368	33.600	*Donation*
Biaya pemeliharaan dan perbaikan	3.966	-	*Maintenance and repair expenses*
Pendapatan dari reksadana yang dikenakan pajak final	(38.629.739)	(22.373.592)	*Income from mutual funds subject to final tax*
(Pendapatan) beban operasional lainnya	304.655	1.976.372	*Other operating (income) expenses*
Jumlah beda tetap	**(23.223.216)**	**(8.656.094)**	***Total permanent differences***
Taksiran laba/(rugi) fiskal	239.350.753	(293.565.406)	*Estimated tax profit/(loss)*
Kompensasi rugi fiskal periode-periode sebelumnya:			*Tax losses carried forward from prior periods:*
Rugi fiskal periode sebelumnya yang masih dapat dikompensasi	(395.255.366)	(101.689.960)	*Tax losses from prior period that can be compensated*
Akumulasi rugi fiskal yang dapat dikompensasi	**(155.904.613)**	**(395.255.366)**	***Accumulated tax losses carried forward***

Rincian rugi fiskal adalah sebagai berikut:

The details of fiscal losses are as follows:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Tahun 2024	(155.904.613)	(293.565.406)	*Year 2024*
Tahun 2023	-	(101.689.960)	*Year 2023*
Total akumulasi rugi fiskal yang dapat dikompensasi	(155.904.613)	(395.255.366)	*Total accumulated tax losses carried forward*
Sisa akumulasi rugi fiskal	**(155.904.613)**	**(395.255.366)**	***Remaining accumulated tax losses***

Laba (rugi) kena pajak hasil rekonsiliasi merupakan dasar dalam pengisian Surat Pemberitahuan Tahunan (SPT) PPh Badan Bank.

Taxable profit (loss) results from reconciliation are the basis in preparing the Bank's Annual Tax Return (SPT) of Corporate Income Tax.

24. PERPAJAKAN (lanjutan) / *24. TAXATION (continued)*

b. Beban Pajak Penghasilan (lanjutan) / *b. Deferred Tax Expense (continued)*

Rekonsiliasi antara beban pajak penghasilan dengan menggunakan tarif pajak yang berlaku dari laba sebelum pajak penghasilan dan beban pajak penghasilan seperti yang disajikan dalam laporan laba rugi dan penghasilan komprehensif lain adalah sebagai berikut:

The reconciliation between the tax expenses computed by applying the applicable tax rate on the profit before income tax and the income tax expenses shown in the statement of profit or loss and other comprehensive income, are as follows:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Laba sebelum pajak penghasilan	162.363.615	148.660.124	*Profit before income tax*
Pajak dihitung dengan tarif pajak yang berlaku	35.717.795	32.705.227	*Tax calculated at applicable tax rates*
Dampak pajak penghasilan pada:			*Tax effects of:*
- Beban yang tidak dapat dikurangkan untuk tujuan pajak	(5.109.107)	(1.904.341)	*Expenses not deductible - for tax purposes*
Beban pajak penghasilan - bersih	**30.608.688**	**30.800.886**	***Income tax expenses - net***

Laba/(rugi) kena pajak hasil rekonsiliasi tahun 2025 dan 2024 menjadi dasar dalam pengisian SPT Tahunan PPh Badan Bank yang disampaikan kepada Otoritas Perpajakan.

Taxable profit/(loss) results from reconciliation in 2025 and 2024 used as basis for preparation of the Bank's Annual Tax Return (SPT) submitted to Tax Authority.

c. Pajak tangguhan / *c. Deferred tax*

	31 Desember/ *December 31, 2025*				
	1 Januari/ *January*	**(Dibebankan)/ dikreditkan ke laporan laba rugi/ *(Charged)/ Credited to profit or loss***	**(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain / *(Charged)/ Credited to other comprehensive income***	**31 Desember/ *December***	
Cadangan bonus, jasa profesional dan promosi	7.699.979	3.003.857	-	10.703.836	*Accrued bonuses, professional fee and promotion*
Cadangan kerugian penurunan nilai	24.795.095	18.652.084	-	43.447.179	*Allowance for impairment lossess*
Imbalan pasca kerja	10.375.956	392.536	1.857.873	12.626.365	*Post-employment benefits*
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	7.193.468	-	(15.173.584)	(7.980.116)	*Unrealised gains/ (losses) on changes in fair value of securities measured at FVOCI*
Rugi pajak yang bisa dikompensasi	86.956.180	(52.657.165)	-	34.299.015	*Tax loss carry forward*
Jumlah aset pajak tangguhan - bersih	**137.020.678**	**(30.608.688)**	**(13.315.711)**	**93.096.279**	***Total deferred tax assets – net***

24. PERPAJAKAN (lanjutan) / *24. TAXATION (continued)*

c. Pajak tangguhan (lanjutan) / *c. Deferred tax (continued)*

	31 Desember/ *December 31, 2024*				
	1 Januari/ *January*	(Dibebankan)/ dikreditkan ke laporan laba rugi/ *(Charged)/ Credited to profit or loss*	(Dibebankan)/ dikreditkan ke pendapatan komprehensif lain / *(Charged)/ Credited to other comprehensive income*	31 Desember/ *December*	
Cadangan bonus, jasa profesional dan promosi	2.242.530	3.085.711	-	5.328.241	*Accrued bonuses, professional fee and promotion*
Cadangan kerugian penurunan nilai	124.010.818	(99.215.723)	-	24.795.095	*Allowance for impairment lossess*
Imbalan pasca kerja	9.631.219	744.737	2.371.738	12.747.694	*Post-employment benefits*
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada FVOCI	4.747.568	-	2.445.900	7.193.468	*Unrealised gains/ (losses) on changes in fair value of securities measured at FVOCI*
Rugi pajak yang bisa dikompensasi	22.371.791	64.584.389	-	86.956.180	*Tax loss carry forward*
Jumlah aset pajak tangguhan - bersih	**163.003.926**	**(30.800.886)**	**4.817.638**	**137.020.678**	***Total deferred tax assets - net***

Manajemen berpendapat bahwa aset pajak tangguhan yang timbul dari perbedaan temporer kemungkinan besar dapat direalisasi pada tahun-tahun mendatang.

Management believes that total deferred tax assets arising from temporary differences are probable to be realised in the future years.

d. Peraturan Menteri Keuangan / *d. Minister of Finance Regulation*

Menteri Keuangan Republik Indonesia menerbitkan Peraturan Menteri Keuangan (PMK) No. 74 pada tanggal 10 Oktober 2024. Berdasarkan peraturan tersebut, Bank harus menghitung cadangan piutang tak tertagih sesuai dengan batasan tertentu yang diatur di dalam PMK 74 mulai tanggal 1 Januari 2024. Pada tanggal 1 Januari 2024, terdapat selisih lebih nilai cadangan per fiskal sebesar Rp254.929.944. Sesuai dengan ketentuan di dalam PMK 74, Bank memutuskan untuk membebankan selisih lebih tersebut di dalam perhitungan pajak penghasilan tahun 2024.

The Minister of Finance of the Republic of Indonesia issued Minister of Finance Regulation (PMK) No. 74 on October 10, 2024. Based on this regulation, the Bank must calculate reserves for bad debts in accordance with certain limits regulated in PMK 74 starting January 1, 2024. On January 1, 2024, there is an excess value of reserves per fiscal amounting to Rp254,929,944. In accordance with the provisions in PMK 74, the Bank decided to charge the excess difference in the 2024 income tax calculation.

e. Pemeriksaan Pajak / *e. Tax Assessments*

Pemeriksaan tahun pajak 2019

Pada 27 Juni 2022 Kantor Pelayanan Pajak (“KPP”) menerbitkan surat pemberitahuan pemeriksaan pajak untuk tahun fiskal 2019. Pada tanggal 4 Maret 2024, KPP menerbitkan Surat Ketetapan Pajak sebagai berikut:

1) Surat Ketetapan Pajak Kurang Bayar No. 00001/206/19/054/24 untuk pajak penghasilan badan tahun fiskal 2019 sebesar Rp3.450.623
2) Surat Ketetapan Pajak Kurang Bayar No. 00002/201/19/054/24 untuk pajak penghasilan pasal 21 sebesar Rp353.807
3) Surat Ketetapan Pajak Kurang Bayar No. 00002/203/19/054/24 untuk pajak penghasilan pasal 23 sebesar Rp892.274
4) Surat Ketetapan Pajak Kurang Bayar No. 00001/240/19/054/24 untuk pajak penghasilan final pasal 4(2) sebesar Rp352.832

Assessment for fiscal year 2019

On June 27, 2022 Tax Office (“KPP”) issued tax assessment notification letter for the fiscal year 2019. On March 4, 2024, KPP issued the following Tax Assessment Letter:

1) Tax Underpayment Assessment Letter No. 00001/206/19/054/24 for corporate income tax for fiscal year 2019 amounting to Rp3,450,623
2) Tax Underpayment Assessment Letter No. 00002/201/19/054/24 for the income tax article 21 amounting to Rp353,807
3) Tax Underpayment Assessment Letter No. 00002/203/19/054/24 for the income tax article 23 amounting to Rp892,274
4) Tax Underpayment Assessment Letter No. 00001/240/19/054/24 for the final income tax article 4(2) amounting to Rp352,832

24. PERPAJAKAN (lanjutan)

e. Pemeriksaan Pajak (lanjutan)

Pemeriksaan tahun pajak 2019 (lanjutan)

Pada 27 Juni 2022 Kantor Pelayanan Pajak ("KPP") menerbitkan surat pemberitahuan pemeriksaan pajak untuk tahun fiskal 2019. Pada tanggal 4 Maret 2024, KPP menerbitkan Surat Ketetapan Pajak sebagai berikut: (lanjutan)

5) Surat Ketetapan Pajak Kurang Bayar No. 00001/207/19/054/24 untuk pajak pertambahan nilai sebesar Rp148.925
6) Surat Tagihan Pajak No. 00003/107/19/054/24 untuk PPN tahun fiskal 2019 sebesar Rp10.365

Pihak Bank menerima atas hasil pemeriksaan tersebut yang tertuang pada Surat Ketetapan Pajak tersebut di atas dan telah membayar kekurangan pajak tersebut pada bulan Maret 2024.

f. Administrasi

Berdasarkan Undang-undang Perpajakan yang berlaku di Indonesia, Bank melaporkan dan menyetorkan pajak berdasarkan prinsip *self-assessment*. Direktorat Jenderal Pajak dapat menetapkan dan mengubah liabilitas pajak dalam batas waktu lima tahun sejak tanggal terutangnya pajak.

24. TAXATION (continued)

e. Tax Assessments (continued)

Assessment for fiscal year 2019 (continued)

On June 27, 2022 Tax Office ("KPP") issued tax assessment notification letter for the fiscal year 2019. On March 4, 2024, KPP issued the following Tax Assessment Letter: (continued)

5) Tax Underpayment Assessment Letter No. 00001/207/19/054/24 for the value added tax amounting to Rp148,925
6) Tax Collection Notice No. 00003/107/19/054/24 for VAT for fiscal year 2019 amounting to Rp10,365

The Bank accepts the assessments results as stated in the above-mentioned Tax Assessment Letter and paid the assessed taxes in March 2024.

f. Administration

Under the prevailing Taxation Laws of Indonesia, the Bank submits and pays taxes on the basis of self-assessment. The Directorate General of Tax may assess or amend taxes liabilities within five years from the date the tax becomes due.

25. BEBAN YANG MASIH HARUS DIBAYAR / *25. ACCRUED EXPENSES*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Bunga yang masih harus dibayar	115.867.203	103.156.225	*Interest payable*
Beban akrual	11.347.773	10.596.342	*Accrued expenses*
Jumlah	**127.214.976**	**113.752.567**	***Total***

Beban akrual meliputi biaya administrasi dan operasional.

Accrued expenses consist of administration and operational expenses.

26. LIABILITAS LAIN-LAIN / *26. OTHER LIABILITIES*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Liabilitas sewa (Catatan 15)	28.688.013	39.811.304	*Lease liabilities (Note 15)*
Kewajiban Transaksi ATM, *Internet Banking* dan *Mobile Banking*	21.328.848	16.430.693	*ATM Transaction, Internet Banking and Mobile Banking liabilities*
Cadangan THR dan bonus	18.358.762	15.984.285	*THR and bonus reserves*
Hutang kepada supplier	10.848.865	11.522.906	*Payable to third parties*
Kewajiban derivatif	3.551.100	4.007.100	*Derivatives liabilities*
Cadangan personalia dan biaya pendidikan karyawan	1.878.591	1.190.001	*Personnel reserve and employee education expenses*
Cadangan kerugian Bank Garansi	645.955	1.270.842	*Allowance for impairment losses Bank Guarantee*
Pendapatan diterima dimuka	324.567	316.845	*Unearned revenues*
Lainnya	13.779.754	10.765.604	*Others*
Jumlah	**99.404.455**	**101.299.580**	***Total***

Saldo lain-lain pada tanggal 31 Desember 2025 dan 2024 terutama terdiri dari hutang kepada pihak ketiga.

The balance of others as of December 31, 2025 and 2024 mainly consist of liabilities to third parties.

Seluruh liabilitas lain-lain pada tanggal 31 Desember 2025 dan 2024 adalah transaksi dengan pihak ketiga.

All other liabilities as of December 31, 2025 and 2024 are transactions with third parties.

27. LIABILITAS IMBALAN KERJA KARYAWAN / *27. EMPLOYEE BENEFITS OBLIGATION*

Liabilitas imbalan kerja yang diakui di laporan posisi keuangan adalah sebagai berikut:

Employee benefit liabilities recognised in the statement of financial position are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Liabilitas imbalan pasca kerja	64.232.439	54.003.307	*Post-employment benefits liability*

Imbalan kerja jangka panjang / *Long term employee benefit*

Informasi di bawah ini mengikhtisarkan komponen beban imbalan pasca kerja karyawan yang diakui di laporan laba rugi dan penghasilan komprehensif lain dan liabilitas imbalan pasca kerja karyawan yang diakui di laporan posisi keuangan pada tanggal 31 Desember 2025 dan 2024 berdasarkan perhitungan yang dilakukan oleh aktuaris independen Kantor Konsultan Aktuaria Indra Catarya Situmeang & Rekan menggunakan metode "*Projected Unit Credit*".

The following informations summarise the components of post-employment benefits expense recognised in the profit or loss and other comprehensive income and post-employment benefits liability recognised in the statement of financial position on December 31, 2025 and 2024 based on the independent actuary Kantor Konsultan Aktuaria Indra Catarya Situmeang & Rekan applied the "Projected Unit Credit" method.

27. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan) / *EMPLOYEE BENEFITS OBLIGATION (continued)*

a. Beban imbalan pasca kerja / *Post-employment benefits expenses*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Biaya jasa kini	8.797.977	7.099.064	*Current service cost*
Biaya bunga	3.505.224	3.084.883	*Interest cost*
Jumlah	**12.303.201**	**10.183.947**	***Total***

b. Liabilitas imbalan pasca kerja / *Post-employment benefits liability*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Nilai kini kewajiban imbalan pasti	64.232.439	54.003.307	*Present value of defined benefit obligations*

Mutasi nilai kini kewajiban adalah sebagai berikut: / *The movement in the present value of obligation are as follow:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pada awal tahun	**54.003.307**	**39.837.511**	***At the beginning of the year***
Biaya jasa kini	8.797.977	7.099.064	*Current service cost*
Imbalan yang dibayar	(10.518.9476)	(6.798.780)	*Benefits paid*
Beban bunga	3.505.224	3.084.883	*Interest cost*
Kerugian aktuarial	8.444.877	10.780.629	*Actuarial loss*
Pada akhir tahun	**64.232.439**	**54.003.307**	***At the end of the year***

Asumsi-asumsi utama yang digunakan dalam menghitung liabilitas imbalan pasca kerja pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut: / *The principal assumptions used to determine the post-employment benefits liability as of December 31, 2025 and 2024 are as follows:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Usia pensiun normal	55 tahun/*years*	55 tahun/*years*	*Normal retirement age*
Tingkat mortalita	TM IV	TM IV	*Mortality rate*
Tingkat cacat	5,00% dari tingkat mortalita/ *of mortality rate*	5,00% dari tingkat mortalita/ *of mortality rate*	*Disability rate*
Tingkat pengunduran diri	5,00% per tahun/ *per annum*	5,00% per tahun/ *per annum*	*Resignation rate*
Tingkat kenaikan gaji	10,00% per tahun/ *per annum*	8,14% per tahun/ *per annum*	*Salary increase rate*
Tingkat suku bunga	6,75% per tahun/ *per annum*	7,04% per tahun/ *per annum*	*Interest rate*

Bank terekspos dengan beberapa risiko melalui program imbalan pasti, dengan risiko paling signifikan pada tingkat diskonto obligasi dan kenaikan gaji. / *The Bank is exposed to a number of risks through its defined benefit pension plan, with the most significant risk on bond's discount rates and salary increase.*

27. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

Imbalan kerja jangka panjang (lanjutan)

b. Liabilitas imbalan pasca kerja (lanjutan)

Tabel di bawah menunjukkan sensitivitas atas kemungkinan perubahan tingkat kenaikan gaji dan tingkat diskonto terhadap kewajiban imbalan pasca kerja Bank (tidak diaudit):

27. EMPLOYEE BENEFITS OBLIGATION (continued)

Long term employee benefit (continued)

b. Post-employment benefits liability (continued)

The following table represent the sensitivity analysis of a reasonably possible change *in salary increase and discount rate of obligation to Bank's post-employment benefit liability (unaudited):*

	31 Desember/*December 31, 2025*		
	Peningkatan/ *Increase by* 100 bps	**Penurunan/ *Decrease by* 100 bps**	
Tingkat diskonto	(4.226.311)	4.751.288	*Discount rates*
Kenaikan gaji	4.559.621	(4.143.420)	*Salary increases*

	31 Desember/*December 31, 2024*		
	Peningkatan/ *Increase by* 100 bps	**Penurunan/ *Decrease by* 100 bps**	
Tingkat diskonto	(3.096.525)	3.456.741	*Discount rates*
Kenaikan gaji	3.387.460	(3.093.862)	*Salary increases*

Analisis sensitivitas di atas didasarkan pada perubahan atas asumsi tunggal dengan asumsi lainnya konstan. Pada praktiknya, kecil kemungkinan hal tersebut terjadi, dan perubahan-perubahan dalam beberapa asumsi mungkin saling berhubungan. Ketika melakukan perhitungan sensitivitas dari kewajiban imbalan pasti ke asumsi aktuarial yang signifikan, metode yang sama (nilai kini dari kewajiban imbalan pasti yang dihitung menggunakan *projected unit credit* pada akhir periode pelaporan) telah diterapkan seperti saat menghitung kewajiban pensiun yang diakui pada laporan posisi keuangan.

The above sensitivity analysis are based on a change in an assumption while holding all other assumption constant. In practice, this is unlikely to occur, and the changes in some of the assumption may be correlated. When calculation the sensitivity of the defined benefit obligation to significant actuarial assumptions, the same method (present value if the defined benefit obligation calculation with the projected unit credit method at the end of the reporting period) has been applied as when calculating the pension liability recognised within the statement of financial position.

Harapan umur hidup

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

Sebagian besar dari kewajiban program menyediakan manfaat seumur hidup, sehingga kenaikan umur hidup akan mengakibatkan kenaikan liabilitas program.

Pada 31 Desember 2025 dan 2024, durasi rata-rata tertimbang dari liabilitas imbalan pasti adalah 14,5 (tidak diaudit).

Life expectancy

The majority of the plan's obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plan's liabilities.

The majority of the plan's obligations are to provide benefits for the life of the member, so increases in life expectancy will result in an increase in plan's liabilities.

In December 31, 2025 and 2024, the weighted average duration of the defined benefit obligation are 14.5 (unaudited).

27. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan) / *EMPLOYEE BENEFITS OBLIGATION (continued)*

Imbalan kerja jangka panjang (lanjutan) / ***Long term employee benefit (continued)***

b. Liabilitas imbalan pasca kerja (lanjutan) / ***b. Post-employment benefits liability (continued)***

Analisis jatuh tempo yang diharapkan dari manfaat pensiun adalah sebagai berikut:

Expected maturity analysis of employee benefits are as follows (unaudited):

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Kurang dari 1 tahun	10.056.939	8.377.630	*Less than 1 year*
2 - 5 tahun	20.678.069	14.730.958	*2 - 5 years*
5 - 10 tahun	12.779.956	18.149.593	*5 - 10 years*
Lebih dari 10 tahun	20.717.475	12.745.126	*Over 10 years*
Jumlah	**64.232.439**	**54.003.307**	***Total***

28. MODAL SAHAM / *SHARE CAPITAL*

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2025 dan 2024 berdasarkan laporan dari Biro Administrasi Efek PT Adimitra Jasa Korpora adalah sebagai berikut:

The Bank's shareholders as of December 31, 2025 and 2024 based on the report of PT Adimitra Jasa Korpora, the Shares Registration Bureau, are as follows:

	31 Desember/*December 31, 2025*			
Pemegang Saham	**Jumlah saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan/ *Percentage of ownership (%)***	**Jumlah modal yang disetor/ *Total capital* (Rp)**	***Shareholders***
PT Victoria Investama Tbk	11.082.071.942	60,17	1.108.207.194	*PT Victoria Investama Tbk*
Suzanna Tanojo	1.163.587.703	6,32	116.358.770	*Suzanna Tanojo*
Chemical Asia Corporation Pte Ltd	1.958.234.404	10,63	195.823.440	*Chemical Asia Corporation Pte Ltd*
Masyarakat (masing-masing di bawah 5%)	4.215.524.779	22,88	421.552.479	*Public (individually less than 5%)*
Jumlah	**18.419.418.828**	**100,00**	**1.841.941.883**	***Total***

	31 Desember/*December 31, 2024*			
Pemegang Saham	**Jumlah saham ditempatkan dan disetor penuh/ *Number of shares issued and fully paid***	**Persentase kepemilikan/ *Percentage of ownership (%)***	**Jumlah modal yang disetor/ *Total capital* (Rp)**	***Shareholders***
PT Victoria Investama Tbk	7.010.537.747	44,23	701.053.775	*PT Victoria Investama Tbk*
Suzanna Tanojo	3.066.411.303	19,35	306.641.130	*Suzanna Tanojo*
Masyarakat (masing-masing di bawah 5%)	5.771.583.856	36,42	577.158.386	*Public (individually less than 5%)*
Jumlah	**15.848.532.906**	**100,00**	**1.584.853.291**	***Total***

28. MODAL SAHAM (lanjutan)

Mutasi jumlah saham yang ditempatkan dan disetor penuh adalah sebagai berikut:

28. SHARE CAPITAL (continued)

The movement in the number of shares issued and fully paid are as follows:

	Jumlah Saham/ *Number of Shares*	
Saldo 1 Januari 2025	**15.848.532.906**	***Balance as of January 1, 2025***
Penambahan modal saham dari penerbitan saham tanpa hak memesan	2.570.885.922	*Additional of new shares from exercise of private placement*
Saldo 31 Desember 2025	**18.419.418.828**	***Balance as of December 31, 2025***

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 3 Juni 2022 yang telah dituangkan dalam Akta Notaris No. 05 tanggal 3 Juni 2022, pemegang saham menyetujui rencana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu.

According to the results of the Annual General Meeting of Shareholders on June 3, 2022 which has been stated in Notary Deed No. 05 dated June 3, 2022, the shareholders approved the plan to execute increase Share Issuance with Pre-emptive Rights.

Pada tanggal 31 Agustus 2022, Bank melakukan penerbitan saham atas Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu sebanyak 2.553.461.919 lembar saham dengan harga pelaksanaan sebesar Rp150 (sembilan lima puluh rupiah) per saham atau seluruhnya sejumlah Rp383.019.288 (tiga ratus delapan puluh tiga miliar sembilan belas juta dua ratus delapan puluh delapan ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 31 Agustus 2022.

On August 31, 2022, the Bank issued shares for Share Issuance with Pre-emptive Rights of 2,553,461,919 shares with an exercise price of Rp150 (one hundred fifty Rupiah) per share or a total of Rp383,019,288 (three hundred eighty three billion nineteen million two hundred and eighty-eight thousand Rupiah) which has been entered into a Bank's account on August 31, 2022.

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 1 tanggal 2 September 2022 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03-0287195 tanggal 3 September 2022.

This increase in paid-in capital has been stated in Notarial Deed No. 1 dated September 2, 2022 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. *AHU-AH.01.03-0287195 dated September 3, 2022.*

Berdasarkan hasil Rapat Umum Pemegang Saham Luar Biasa tanggal 19 Oktober 2022 yang telah dituangkan dalam Akta Notaris No. 31 tanggal 19 Oktober 2022, pemegang saham menyetujui rencana Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu disertai dengan penerbitan Waran Seri VII (Catatan 26).

Based on the results of the Extraordinary General Meeting of Shareholders on October 19, 2022 which has been stated in Notary Deed No. 31 dated October 19, 2022, the shareholders approved the plan to increase capital by granting pre-emptive rights accompanied by the issuance of Series VII Warrants (Note 26).

Pada tanggal 29 Desember 2022, Bank melakukan penerbitan saham atas Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu sebanyak 2.807.640.227 lembar saham dengan harga pelaksanaan sebesar Rp150 (seratus lima puluh rupiah) per saham atau seluruhnya sejumlah Rp421.146.034 (empat ratus dua puluh satu miliar seratus empat puluh enam juta tiga puluh empat ribu rupiah) yang telah masuk dalam rekening bank pada tanggal 28 Desember 2022 disertai dengan penerbitan Waran Seri VII sebanyak 2.573.670.117 waran dengan harga pelaksanaan sebesar Rp100 (seratus Rupiah) per waran.

On December 29, 2022, the Bank issued shares for Share Issuance with Pre-emptive Rights of 2,807,640,227 shares with an exercise price of Rp150 (one hundred fifty Rupiah) per share or a total of Rp421,146,034 (four hundred twenty one billion one hundred forty-six million thirty-four thousand Rupiah) which was entered into a Bank's account on December 28, 2022 in conjunction with the issuance of Series VII Warrants of 2,573,670,117 warrants with an exercise price of Rp100 (one hundred Rupiah) per warrant.

28. MODAL SAHAM (lanjutan)

Peningkatan modal disetor ini telah dituangkan dalam Akta Notaris No. 7 tanggal 29 Desember 2022 dan telah diterima dan dicatat di dalam Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No. AHU-AH.01.03.0497387 tanggal 29 Desember 2022. Sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Maret 2022 adalah 15.848.234.714 saham.

Pada tahun 2024, Bank menerbitkan 297.128 lembar saham yang berasal dari hasil pelaksanaan Waran Seri VII pada tahun 2024 sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2024 adalah 15.848.532.906 saham.

Pada tahun 2025, Bank menerbitkan 2.570.885.922 lembar saham yang berasal dari hasil pelaksanaan Waran Seri VII pada tahun 2025 sehingga jumlah saham yang ditempatkan dan disetor penuh pada 31 Desember 2025 adalah 18.419.418.828 saham (Catatan 1b).

28. SHARE CAPITAL (continued)

This increase in paid-in capital has been stated in Notarial Deed No. 7 dated December 29, 2022 and has been reported and accepted by Ministry of Law and Human Rights of the Republic of Indonesia through its letter No. AHU-AH.01.03.0497387 dated December 29, 2022. Therefore, the number of issued and fully paid shares on March 31, 2022 is 15,848,234,714 shares.

In 2024, the Bank issued 297,128 shares originating from the execution of Series VII Warrants in 2024, so the total shares placed and fully paid as of December 31, 2024 were 15,848,532,906 shares.

In 2025, the Bank issued 2,570,885,922 shares originating from the execution of Series VII Warrants in 2025, so the total shares placed and fully paid as of December 31, 2025 were 18,419,418,828 shares (Notes 1b).

29. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA

Tambahan modal disetor merupakan selisih antara jumlah yang diterima dari penerbitan saham dengan nilai nominal yang dicatat sebagai setoran modal.

Pada 4 Juni 2022, Sistem Administrasi Badan Hukum Kementerian Hukum dan HAM berdasarkan surat No.AHU-0103473.AH.01.11 Tahun 2022, telah mencatatkan peningkatan modal disetor Bank menjadi Rp4.100.000.000.000,- (empat triliun seratus miliar Rupiah) (nilai penuh) saham masing-masing dengan nilai nominal Rp100 (seratus Rupiah) (nilai penuh). Peningkatan modal disetor ini berdasarkan hasil Rapat Umum Pemegang Saham Tahunan yang telah dituangkan dalam Akta Notaris No. 7 tanggal 3 Juni 2022.

Pada 22 Juni 2022, Bank menerima tambahan dana setoran modal diterima dimuka dari PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia, dan PT Emperor Finance Indonesia dengan total seluruhnya sebesar Rp254.500.000.000 (nilai penuh) dalam rangka pemenuhan modal inti minimum berdasarkan POJK No. 12/POJK.03/2020 tentang Konsolidasi Bank Umum yang pelaksanaannya dilakukan sesuai dengan ketentuan POJK No. 11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum tanggal 29 Januari 2016.

29. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE

The additional paid-in capital represent the excess of proceeds from issuance of shares with the par value recorded as paid-in capital.

On June 4, 2022, Legal Entity Administration System of the Ministry of Law and Human Rights based on letter No.AHU-0103473.AH.01.11 Year 2022, the Bank's paid-up capital increased to Rp4,100,000,000,000.- (four trillion one hundred billion Rupiah) (full amount) shares each with nominal of Rp100 (one hundred Rupiah) (full amount). This increase of paid-in capital is based on the results of the Annual General Meeting of Shareholders as stated in the Notarial Deed No. 7 on June 3, 2022.

On June 22, 2022, the Bank received fund of capital received in advance from PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia and PT Emperor Finance Indonesia amounted to Rp254,500,000,000 (full amount) to fulfill the minimum core capital requirement in accordance with POJK No 12/POJK.03/2020 regarding Commercial Bank Consolidation in accordance with POJK No.11/POJK.03/2016 regarding Liability for Fulfillment of Minimum Capital of Commercial Bank dated January 29, 2016.

29. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA (lanjutan)

Pada tanggal 31 Agustus 2022 Bank melakukan penerbitan 2.553.461.919 lembar saham dengan harga pelaksanaan Rp150 (nilai penuh) per lembar saham. Total penerimaan dana dari penerbitan saham tersebut adalah sebesar Rp383.019.288 dimana nilai nominal saham adalah sebesar Rp255.346.192 sehingga atas penerbitan saham tersebut Bank mencatat tambahan modal disetor sebesar Rp127.673.096.

Penerbitan saham ini mencakup konversi dana setoran modal diterima dimuka yang telah diterima dari PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia dan PT Emperor Finance menjadi saham dengan harga pelaksanaan Rp150 (nilai penuh) per saham dengan total seluruhnya Rp312.450.000 sehingga jumlah saham yang diterbitkan atas konversi setoran modal diterima dimuka adalah sebanyak 2.083.333.332 lembar. Konversi setoran modal diterima dimuka telah mendapatkan persetujuan dari Otoritas Jasa Keuangan melalui surat No. S-69/PB.33/2022 tanggal 4 Juli 2022.

Pada tanggal 14 Oktober 2022, Bank menerima tambahan dana setoran modal diterima dimuka dari Suzanna Tanojo sebesar Rp200.000.000 dalam rangka pemenuhan modal inti minimum berdasarkan pemenuhan modal inti minimum berdasarkan POJK No. 12/POJK.03/2020 tentang Konsolidasi Bank Umum yang pelaksanaannya dilakukan sesuai dengan ketentuan POJK No.11/POJK.03/2016 tentang Kewajiban Penyediaan Modal Minimum Bank Umum tanggal 29 Januari 2016.

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 19 Oktober 2022 yang telah dituang dalam Akta Notaris No. 32 tanggal 19 Oktober 2022 pemegang saham menyetujui keputusan berikut:

1. Menyetujui Penambahan modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) sebanyak-banyaknya 4.955.425.905 saham dengan nilai nominal Rp100 per saham, yang disertai dengan penerbitan sebanyak-banyaknya 4.542.473.746 Waran Seri VII.
2. Menyetujui pemberian kuasa dan wewenang kepada Direksi Bank untuk:
   - Menetapkan jumlah saham yang ditawarkan dalam PMHMETD serta jumlah Waran Seri VII;
   - Menetapkan harga pelaksanaan PMHMETD dan harga pelaksanaan Waran Seri VII;

29. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE (continued)

On August 31, 2022 the Bank issued 2,553,461,919 shares with an exercise price of Rp150 (full amount) per share. The total proceeds received from the issuance of these shares amounted to Rp383,019,288 where the nominal value of the shares was Rp255,346,192 therefore for the issuance of these shares the Bank recorded additional paid-in capital of Rp127,673,096.

The issuance of these shares includes the conversion of capital received in advance from PT Victoria Investama Tbk, PT Bhuwanatala Indah Permai Tbk, PT Victoria Sekuritas Indonesia, PT Victoria Alife Indonesia and PT Emperor Finance into shares with an exercise price of Rp150 (full amount) per share for a total of Rp312,450,000 so that the number of shares issued upon the conversion capital received in advance are 2,083,333,332 shares. The conversion of capital received in advance has been approved by Financial Services Authority through letter No. S-69/PB.33/2022 dated July 4, 2022.

On October 14, 2022, the Bank received additional capital received in advance from Suzanna Tanojo in the amount of Rp200,000,000 in order to fulfill the minimum core capital based on meeting the minimum core capital based on POJK No. 12/POJK.03/2020 concerning Consolidation of Commercial Banks, the implementation of which is carried out in accordance with POJK provisions No. 11/POJK.03/2016 concerning Minimum Capital Adequacy Requirements for Commercial Banks dated January 29, 2016.

Based on Extraordinary General Meeting of Shareholders on October 19, 2022 which has been legalised through Notarial Deed No. 32 dated October 19, 2022, the shareholders agreed the following decisions:

1. *Approved additional capital with Pre-emptive Rights (PMHMETD) of maximum of 4,955,425,905 shares with nominal value of Rp100 per share along with issuance of for a maximum of 4,542,473,746 Warrant Series VII.*
2. *Approved to grant power and authority to the Board of Directors of Bank Victoria to:*
   - *Determine the number of shares offered in the PMHMETD and the number of Warrant Series VII;*
   - *Determine the exercise price of PMHMETD and exercise price for Warrants Series VII;*

29. TAMBAHAN MODAL DISETOR DAN SETORAN MODAL DITERIMA DIMUKA (lanjutan)

Berdasarkan hasil Rapat Umum Pemegang Saham Tahunan tanggal 19 Oktober 2022 yang telah dituang dalam Akta Notaris No. 32 tanggal 19 Oktober 2022 pemegang saham menyetujui keputusan berikut: (lanjutan)

- Melakukan segala tindakan yang diperlukan dalam pelaksanaan PMHMETD dan penerbitan Waran Seri VII dengan memperhatikan peraturan perundang-undangan yang berlaku; dan
- Melakukan peningkatan modal ditempatkan dan modal disetor setelah pelaksanaan PMHMETD dan Waran Seri VII dan mengubah Pasal 4 ayat 2 dan 3 Anggaran Dasar Bank Victoria.

Pada tanggal 29 Desember 2022, Bank melakukan penerbitan 2.807.640.227 lembar saham dengan harga pelaksanaan Rp150 (nilai penuh). Total penerimaan dana dari penerbitan saham tersebut adalah sebesar Rp421.146.034 dimana nilai nominal saham adalah sebesar Rp280.764.022 sehingga atas penerbitan saham tersebut Bank mencatat tambahan modal disetor sebesar Rp140.382.012.

Penerbitan saham ini mencakup konversi atas dana setoran modal diterima dimuka yang telah diterima dari PT Victoria Investama Tbk dan Suzanna Tanojo menjadi saham dengan harga pelaksanaan Rp150 (nilai penuh) per saham dengan total seluruhnya Rp420.000.000 sehingga jumlah saham yang diterbitkan atas konversi setoran modal diterima dimuka adalah sebanyak 2.799.999.999 lembar saham. Konversi setoran modal diterima dimuka telah mendapatkan persetujuan dari Otoritas Jasa Keuangan berdasarkan surat persetujuan No. S-120/PB.33/2022 tanggal 25 November 2022.

Mutasi tambahan modal disetor adalah sebagai berikut:

29. ADDITIONAL PAID-IN CAPITAL AND CAPITAL RECEIVED IN ADVANCE (continued)

Based on Extraordinary General Meeting of Shareholders on October 19, 2022 which has been legalised through Notarial Deed No. 32 dated October 19, 2022, the shareholders agreed the following decisions: (continued)

- *Implementation of PMHMETD and issuance of Series VII Warrants with due observance of the applicable laws and regulations; and*
- *Increase the issued and paid-up capital after the implementation of the PMHMETD and Series VII Warrants and amending Article 4 paragraphs 2 and 3 of Bank Victoria's Articles of Association.*

On December 29, 2022 the Bank issued 2,807,640,227 shares with an exercise price of Rp150 (full amount). The total receipt of funds from the issuance of these shares amounted to Rp421,146,034 where the nominal value of the shares was Rp280,764,022 so that for the issuance of these shares the Bank recorded additional paid-in capital of Rp140,382,012.

The issuance of these shares includes the conversion of capital received in advance from PT Victoria Investama Tbk and Suzanna Tanojo into shares with an exercise price of Rp150 (full amount) per share for a total of Rp420,000,000 therefore the number of shares issued on the conversion of capital received in advance is 2,799,999,999 shares. The conversion of capital received in advance has been approved by Financial Services Authority based on approval letter No. S-120/PB.33/2022 dated November 25, 2022.

The changes in additional paid-in capital are as follows:

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Saldo awal	**668.370.810**	**668.684.728**	***Beginning balance***
Biaya emisi efek	(582.205)	(313.918)	*Issuance cost*
Saldo akhir	**667.788.605**	**668.370.810**	***Ending balance***

30. PENGGUNAAN LABA BERSIH

Penggunaan Laba Bersih Tahun 2024

Berdasarkan Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) tanggal 14 Juni 2024 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank membukukan laba bersih pada tahun 2023, dan dipergunakan untuk dana cadangan umum dan laba ditahan. Dengan demikian Bank tidak melakukan pembagian dividen untuk para pemegang saham.

Penggunaan Laba Bersih Tahun 2025

Berdasarkan Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) tanggal 20 Juni 2025 yang dinyatakan dalam Akta Notaris Fathiah Helmi, S.H. tanggal yang sama, Bank membukukan laba bersih pada tahun 2024, dan dipergunakan untuk dana cadangan umum dan laba ditahan. Dengan demikian Bank tidak melakukan pembagian dividen untuk para pemegang saham.

31. CADANGAN UMUM

Pada tanggal 31 Desember 2025 dan 2024, Bank telah membentuk cadangan umum dan wajib sebesar Rp252.200.000 dan Rp227.200.000. Kenaikan sebesar Rp25.000.000 merupakan penambahan cadangan umum yang disepakati melalui Rapat Umum Pemegang Saham Tahunan (RUPST) pada tanggal 20 Juni 2025. Penambahan cadangan umum tertuang dalam akta Berita Acara Rapat Umum Pemegang Saham Tahunan (RUPST) yang dinyatakan dalam Akta Notaris Fathiah Helmi S.H. pada tanggal yang sama.

Cadangan umum dan wajib ini dibentuk sehubungan dengan Undang-Undang Republik Indonesia No. 1/1995 yang telah digantikan dengan Undang-Undang No. 40/2007 efektif tanggal 16 Agustus 2007 mengenai Perseroan Terbatas, yang mengharuskan perusahaan-perusahaan untuk membuat penyisihan cadangan umum sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-Undang tersebut tidak mengatur jangka waktu untuk membentuk cadangan tersebut.

30. APPROPRIATION OF NET INCOME

Appropriation of 2024 Net Income

Based on the Minutes of the Annual General Meeting of Shareholders dated June 14, 2024, as stated in the Notarial Deed of Fathiah Helmi, S.H. on the same date, the Bank recorded a net profit in 2023, and this was used for general reserve funds and retained earnings. Thus, the Bank did not distribute dividends to shareholders.

Appropriation of 2025 Net Income

Based on the Minutes of the Annual General Meeting of Shareholders dated June 20, 2025, as stated in the Notarial Deed of Fathiah Helmi, S.H. on the same date, the Bank recorded a net profit in 2024, and this was used for general reserve funds and retained earnings. Thus, the Bank did not distribute dividends to shareholders.

31. GENERAL RESERVES

As of December 31, 2025 and 2024, the Bank had set up mandatory and general reserves amounting to Rp252,200,000 and Rp227,200,000. The increase of Rp25,000,000 is an addition to the general reserve agreed upon at the Annual General Meeting of Shareholders on June 20, 2025. The addition to the general reserve is outlined in the minutes of the Annual General Meeting of Shareholders as stated in the Notarial Deed of Fathiah Helmi S.H. on the same date.

These general and legal reserve were provided in relation with the Law of the Republic of Indonesia No. 1/1995 which has been replaced with the Law No. 40/2007 effective on August 16, 2007 regarding the Limited Liability Company which requires the companies to set up a general reserve amounting to at least 20% of the issued and paid-up share capital. There is no timeline over which this amount should be provided.

32. PENDAPATAN BUNGA / *32. INTEREST INCOME*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pinjaman yang diberikan	1.769.949.830	1.664.126.311	*Loans*
Efek-efek	483.321.568	384.208.568	*Marketable securities*
Penempatan pada Bank Indonesia dan bank lain	46.843.542	27.932.876	*Placements with Bank Indonesia and other banks*
Surat-surat berharga yang dibeli dengan janji dijual kembali	2.239.035	-	*Securities sold under repurchase agreements*
Jumlah	**2.302.353.975**	**2.076.267.755**	***Total***

Berdasarkan pihak lawan / ***By counterparties***

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pihak berelasi (Catatan 42)	11.275.069	13.330.213	*Related party (Note 42)*
Pihak ketiga	2.291.078.906	2.062.937.542	*Third party*
Jumlah	**2.302.353.975**	**2.076.267.755**	***Total***

33. BEBAN BUNGA / *33. INTEREST EXPENSES*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Simpanan dana pihak ketiga			*Third party deposits*
Deposito	1.056.274.926	970.785.454	*Time deposits*
Tabungan	185.399.019	156.618.299	*Savings deposits*
Giro	140.721.991	119.203.381	*Demand deposits*
Negotiable Certificate Deposits	21.513.088	33.718.644	*Negotiable Certificate Deposits*
Simpanan dari bank lain			*Deposits from other banks*
Call money	24.004.051	41.748.265	*Call money*
Efek-efek yang diterbitkan	297.465.626	190.184.028	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	6.217.943	7.533.032	*Securities sold under repurchased agreement*
Amortisasi emisi obligasi	12.040.072	7.876.104	*Amortisation of bonds issuance cost*
Jumlah	**1.743.636.716**	**1.527.667.207**	***Total***

Berdasarkan pihak lawan / ***By counterparties***

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pihak berelasi (Catatan 42)	24.907.938	41.487.515	*Related party (Note 42)*
Pihak ketiga	1.718.728.778	1.486.179.692	*Third party*
Jumlah	**1.743.636.716**	**1.527.667.207**	***Total***

34. PENDAPATAN/(BEBAN) OPERASIONAL LAINNYA - LAIN-LAIN – BERSIH / *34. OTHER OPERATING INCOME/(EXPENSES) - OTHERS - NET*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Penerimaan kembali aset yang telah dihapusbukukan	139.025.554	146.937.841	*Recovery of assets previously written-off*
Laba penjualan investasi (Catatan 13)	100.660.221	-	*Gain from investment sale*
Pendapatan biaya administrasi jasa perbankan	65.216.336	63.827.024	*Receipt of administrative charges for banking services*
Laba transaksi *spot*	48.468.593	36.830.945	*Gain from spot transaction*
Laba transaksi *swap*	14.732.350	34.982.500	*Swap transaction profits*
Pendapatan rekening tidak aktif, denda saldo minimum, dan penggantian buku	6.580.477	4.323.128	*Income from inactive accounts, minimum deposit penalty, saving account replacement*
Denda keterlambatan	5.783.473	4.214.074	*Penalty income*
Komisi atas *Internet* dan *Mobile Banking*	4.605.644	5.338.227	*Commission on Internet and Mobile Banking*
Pendapatan transaksi *letter of credit*	2.590.121	528.999	*Income from letter of credit transactions*
Laba transaksi *forward*	834.370	1.174.315	*Gain from forward transaction*
(Kerugian)/Keuntungan yang belum terealisasi transaksi derivatif	(766.650)	795.408	*Unrealised (loss)/gain from derivatives transactions*
Pendapatan dari transaksi ATM	342.263	543.834	*Income from ATM transaction*
Pendapatan transaksi BI-FAST	5.150	5.118	*Income from BI-FAST transactions*
Pendapatan administrasi operasional lainnya	3.460.553	4.133.325	*Other administrative operational income*
Jumlah	**391.538.455**	**303.634.738**	***Total***

35. BEBAN/(PENDAPATAN) PENYISIHAN KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON-KEUANGAN / *35. PROVISION FOR IMPAIRMENT LOSSES EXPENSES/(INCOME) ON FINANCIAL AND NON-FINANCIAL ASSETS*

Beban/(pendapatan) penyisihan kerugian penurunan nilai aset keuangan:

Provision for impairment losses expenses/(income) on financial assets are as follows:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pinjaman yang diberikan	303.032.335	190.930.041	*Loans*
Pendapatan bunga masih akan diterima (Catatan 10)	2.545.404	17.523.019	*Interest income receivables (Note 10)*
Aset lain-lain	3.436.049	842.948	*Other assets*
Efek-efek	(87.277)	(7.958.551)	*Marketable securities*
Bank Garansi	(624.888)	723.035	*Bank Guarantee*
Jumlah	**308.301.623**	**202.042.492**	***Total***

35. BEBAN/(PENDAPATAN) PENYISIHAN KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON-KEUANGAN (lanjutan)

35. PROVISION FOR IMPAIRMENT LOSSES EXPENSES/(INCOME) ON FINANCIAL AND NON-FINANCIAL ASSETS (continued)

Beban/(pembalikan) penyisihan kerugian penurunan nilai aset non-keuangan:

Provision/(reversal) of for impairment losses of non-financial assets:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Agunan yang diambil alih	33.117.449	(86.739.397)	*Foreclosed assets*

36. BEBAN UMUM DAN ADMINISTRASI

36. GENERAL AND ADMINISTRATIVE EXPENSES

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Premi penjaminan	45.707.673	43.691.208	*Insurance premium*
Penyusutan dan amortisasi (Catatan 15)	27.719.600	24.481.421	*Depreciation and amortization (Note 15)*
Jasa profesional	27.325.433	26.861.944	*Professional fees*
Pemeliharaan dan perbaikan	16.732.542	11.836.879	*Repairs and maintenance*
Pengembangan teknologi	14.891.970	11.940.259	*Technology development*
Pungutan OJK tahunan	14.610.482	14.992.416	*Annual fee OJK*
Sewa gedung dan kendaraan	12.833.616	11.780.398	*Building and vehicle rental*
Iklan dan promosi	12.816.544	9.339.624	*Advertising and promotion*
Asuransi	9.854.775	4.897.338	*Insurance*
Biaya Internet dan *Mobile Banking*	7.791.405	9.636.295	*Internet and Mobile Banking expenses*
Telepon, telex dan faksimili	5.808.854	5.770.361	*Telephone, telex and faximile*
Pendidikan dan pengembangan	5.803.820	6.110.172	*Study and development*
Amortisasi aset tak berwujud (Catatan 17)	5.402.183	2.986.566	*Amortisation of intangible assets (Note 17)*
Biaya umum lainnya	4.421.274	2.117.294	*Other general expenses*
Beban bunga atas liabilitas sewa (Catatan 15)	3.138.264	4.117.817	*Interest expense of lease liabilities (Note 15)*
Biaya jasa pihak ketiga	2.821.793	3.294.180	*Third-party fee*
Pungutan LPS tahunan	2.795.206	-	*Annual fee LPS*
Pemakaian listrik, gas dan air minum	2.168.980	2.335.306	*Electricity, gases and waters*
Transportasi	1.872.484	1.839.235	*Transportation*
Barang cetakan dan alat tulis	1.622.957	2.724.187	*Printing items and stationery*
Biaya iuran lainnya	1.158.723	1.127.247	*Other contribution fees*
Biaya tanggung jawab sosial perusahaan	433.028	1.208.652	*Corporate social responsibility expense*
Pemasaran	219.097	71.102	*Marketing*
Biaya kurir	129.643	160.489	*Courier expenses*
Surat kabar dan majalah	38.597	43.154	*Newspaper and magazines*
Benda pos dan materai	17.615	19.315	*Postage and stamp*
Jumlah	**228.136.558**	**203.382.859**	***Total***

Biaya umum lainnya terutama terdiri dari biaya keamanan dan kebersihan, biaya fotokopi dan biaya entertainment yang secara individual nilainya tidak signifikan.

Other general expenses mainly consist of security and cleaning expenses, photocopy expenses and entertainment expenses with insignificant individual balances.

37. BEBAN TENAGA KERJA / *37. PERSONNEL EXPENSES*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Gaji dan tunjangan	143.915.037	128.235.988	*Salaries and allowance*
Pesangon dan biaya apresiasi lainnya	2.139.332	1.551.547	*Severance pay and other appreciation expense*
Biaya jasa tenaga kerja	11.439.795	10.860.684	*Outsourcing service expenses*
Imbalan pasca kerja	12.303.201	10.183.947	*Post-employment benefits*
Tunjangan Hari Raya dan bonus	20.361.755	20.282.112	*Holiday entitlements and bonuses*
Biaya jaminan kesehatan dan pensiun	3.285.053	3.931.446	*Health and pension insurance*
Lembur	448.010	573.351	*Overtime*
Jumlah	**193.892.183**	**175.619.075**	***Total***

Termasuk dalam beban tenaga kerja adalah kompensasi yang diberikan kepada manajemen dan karyawan kunci (Catatan 42).

Included in the personnel expenses are compensation to key management and employees (Note 42).

38. BEBAN OPERASIONAL LAINNYA - LAIN-LAIN / *38. OTHER OPERATING EXPENSES - OTHERS*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Rugi transaksi valuta asing	73.321.534	69.013.125	*Loss on foreign exchange transaction*
Rugi atas modifikasi pinjaman yang diberikan	15.878.158	28.507.017	*Loss on loan modification*
Biaya penghapus-bukuan tagihan asuransi kredit	6.192.001	2.372.473	*Loan insurance receivables write-off expenses*
Beban administrasi dan kliring	4.577.112	6.005.678	*Administration and clearing expenses*
Beban *membership* ATM dan iuran tahunan ATM	3.273.080	3.777.828	*ATM membership and annual fee ATM expenses*
Beban pajak	2.631.249	1.555.767	*Tax expenses*
Biaya provisi dan komisi dana	2.437.231	1.714.315	*Provision and commission funds*
(Pendapatan)/kerugian belum direalisasi atas transaksi derivatif	(1.293.924)	4.007.100	*Unrealised (gain)/loss from derivatives transactions*
Beban parkir dan tol	1.076.025	1.081.773	*Parking and toll expenses*
Beban pemasaran	786.322	608.113	*Marketing expenses*
Beban representasi dan jamuan	613.738	403.297	*Representation and entertainment expenses*
Biaya operasional lainnya	345.754	327.491	*Other operational expenses*
Beban keperluan kantor	133.473	152.600	*Office supplies expenses*
Beban sumbangan	34.368	33.600	*Donation expenses*
Jumlah	**110.006.121**	**119.560.177**	***Total***

39. BEBAN (PENDAPATAN) NON-OPERASIONAL – BERSIH / *NON-OPERATING EXPENSES (INCOME) - NET*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pendapatan non-operasional:			*Non-operating income:*
Laba revaluasi valuta asing	(13.105.741)	-	*Gain on foreign exchange revaluation*
Laba Penjualan AYDA	(8.650.483)	-	*Gain on sale of foreclosed assets*
Laba penjualan aset tetap	(190.120)	-	*Gain on sale fixed assets*
Hasil sewa	(188.730)	(179.280)	*Rent income*
Pendapatan lainnya	(5.649.456)	(4.479.589)	*Other income*
Beban non-operasional:			*Non-operating expense:*
Rugi penjualan AYDA	39.510.192	132.435.515	*Loss on sale of foreclosed assets*
Beban pemeliharaan AYDA	28.895.294	-	*Maintenance expenses of foreclosed assets*
Rugi penjualan aset tetap (Catatan 15)	-	1.600.153	*Loss on sale of fixed assets (Note 15)*
Rugi revaluasi valuta asing	-	935.554	*Loss on foreign exchange revaluation*
Penurunan nilai aset tetap (Catatan 15)	-	10.176.913	*Impairment of fixed assets (Note 15)*
Beban non-operasional lainnya	18.993.945	3.820.658	*Other non-operational expenses*
Beban non-operasional - bersih	**59.614.901**	**144.309.924**	***Non-operating expenses - net***

Pendapatan lainnya terutama terdiri dari diskon pembelian kupon belanja dan lebih voucher program tabungan.

Other income mainly consist of discount on voucher purchase and surplus from savings program vouchers.

Beban non operasional lainnya terutama terdiri dari biaya *gathering* hari raya dan administrasi lelang yang secara individual nilainya tidak signifikan.

Other non-operational expenses mainly consist of holiday gathering and auction administration fees with insignificant individual balances.

40. LABA PER SAHAM / *INCOME PER SHARE*

Laba per saham dasar dihitung dengan membagi laba tahun berjalan yang dapat diatribusikan kepada pemilik Bank dengan jumlah rata-rata tertimbang saham biasa yang beredar pada tahun bersangkutan.

Basic income per share is calculated by dividing the income for the year attributable to the Bank's shareholders with the weighted-average number of ordinary shares outstanding during the year.

Laba per saham dilusian dihitung dengan membagi laba bersih dengan rata-rata tertimbang jumlah saham yang beredar ditambah dengan rata-rata tertimbang jumlah saham yang akan diterbitkan atas konversi efek yang berpotensi saham yang bersifat dilutif.

Diluted income per share is calculated by dividing net income by the weighted average number of shares outstanding plus the weighted average number of shares outstanding which would be issued on the conversion of the dilutive potential shares.

40. LABA PER SAHAM (lanjutan) / *40. INCOME PER SHARE (continued)*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Laba tahun berjalan yang dapat diatribusikan kepada pemilik Entitas Induk untuk perhitungan laba per saham dasar dan dilusian	131.744.927	117.859.238	*Income for the year attributable to equity holders of the Parent Company to be accounted for basic and diluted earnings per share*
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dasar	18.419.419	15.848.529	*Weighted-average common stock for computation of basic earnings per share*
Jumlah waran yang beredar untuk perhitungan laba per saham	-	2.573.372	*Outstanding warrants for computation of basic earnings per share*
Jumlah rata-rata tertimbang saham biasa untuk perhitungan laba per saham dilusian	18.419.419	15.848.529	*Weighted-average common stock for computation of diluted earnings per share*
Laba per saham dasar (dalam Rupiah penuh)	7,15	7,44	*Basic income per share (in Rupiah full amount)*
Laba per saham dasar dilusian (dalam Rupiah penuh)	7,15	7,44	*Diluted income per share (in Rupiah full amount)*

41. TRANSAKSI NON-KAS / *41. NON-CASH TRANSACTIONS*

Transaksi non-kas dari rekonsiliasi liabilitas yang timbul dari aktivitas pendanaan adalah sebagai berikut:

Non-cash transaction from net debt reconciliation affected from financing activities as it follows:

	31 Desember/*December 31, 2025*				
	Saldo awal/ *Beginning Balance*	**Arus kas/ *Cash flow***	**Perubahan non-kas/ *Non-cash activity***	**Saldo akhir/ *Ending Balance***	
Efek-efek yang diterbitkan	2.289.412.649	1.650.000.000	(17.031.510)	3.922.381.139	*Securities Issued*
Liabilitas sewa	39.811.304	(15.948.812)	4.825.521	28.688.013	*Lease liabilities*
Jumlah	**2.329.223.953**	**1.634.051.188**	**(12.205.989)**	**3.951.069.152**	***Total***

	31 Desember/*December 31, 2024*				
	Saldo awal/ *Beginning Balance*	**Arus kas/ *Cash flow***	**Perubahan non-kas/ *Non-cash activity***	**Saldo akhir/ *Ending Balance***	
Efek-efek yang diterbitkan	1.347.639.528	950.000.000	(8.226.879)	2.289.412.649	*Securities Issued*
Liabilitas sewa	47.309.526	(12.635.205)	5.136.983	39.811.304	*Lease liabilities*
Jumlah	**1.394.949.054**	**937.364.795**	**(3.089.896)**	**2.329.223.953**	***Total***

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI

Sifat Hubungan

Pihak-pihak berelasi adalah perusahaan dan perorangan yang mempunyai keterkaitan kepemilikan atau kepengurusan secara langsung maupun tidak langsung dengan Bank sebagaimana diungkapkan pada Catatan 2af.

42. INFORMATION OF RELATED PARTIES

Nature of Relationship

Related parties are companies and individuals who have ownership or management relationship directly or indirectly with the Bank as stated in Note 2af.

Pihak berelasi/ ***Related parties***	**Sifat dari hubungan/** ***Nature of relationship***	**Sifat dari transaksi/** ***Nature of transaction***
PT Victoria Investama Tbk	Pemegang saham/*Shareholder*	Simpanan nasabah/*Deposits from customers,*
PT Bank Victoria Syariah*)	Entitas asosiasi/*Associate entity*	Simpanan dari bank lain/*Deposits from other banks*
PT Victoria Sekuritas Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Pinjaman yang diberikan/*Loans*
PT Victoria Insurance Tbk	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah,pinjaman yang diberikan, asuransi aset tetap dan asuransi kas/ *Deposits from customers, loans, fixed assets insurance and cash insurance*
PT Victoria Alife Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Victoria Manajemen Investasi	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Merak Energi Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Tri Daya Investindo (d/h PT BIP Tri Daya Propertindo)	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Grha Swahita	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
PT Padi Unggul Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/ *Deposit from customers*
PT BIP Loka Kencana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Sentosa	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Studio One	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Asri Kencana Gemilang	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Artoda Karya Gemilang	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

42. INFORMATION OF RELATED PARTIES (continued)

Sifat Hubungan (lanjutan)

Nature of Relationship (continued)

Pihak berelasi/ *Related parties*	Sifat dari hubungan/ *Nature of relationship*	Sifat dari transaksi/ *Nature of transaction*
PT Bhuwanatala Indah Permai	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Frogurt Sari Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Emperor Finance Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Grata Mulia Pratama	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Putra Asih Laksana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Suryayudha Investindo Cipta	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT GMT Investama Mandiri Tbk	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Dwimagna Kapital	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Magna Investa Mandiri	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bintang Jaya Bara Sentosa	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT BIP Boga Entertainment	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Boga Inti Cita Rasa (d/h PT BIP Boga Permai)	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Bumi Semesta Lestari	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Prolestari Mega Persada	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Regis Pratama Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Surya Cakra Multi Sarana	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Verena Kapital	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
Chemical Asia Corp. Pte Ltd.	Pemegang saham/*Shareholder*	Simpanan nasabah/*Deposits from customers*
PT Sulfindo Adiusaha	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *INFORMATION OF RELATED PARTIES (continued)*

Sifat Hubungan (lanjutan) / ***Nature of Relationship (continued)***

Pihak berelasi/ *Related parties*	Sifat dari hubungan/ *Nature of relationship*	Sifat dari transaksi/ *Nature of transaction*
PT Cahaya Medika Health Care	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Dwimagna Kapital Indonesia	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Jaya Bhakti Mandiri	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
PT Nata Patindo	Dimiliki oleh pemegang saham utama/*Under common control*	Simpanan nasabah/*Deposits from customers*
Suzanna Tanojo	Pemegang saham pengendali/ *Controlling Shareholder*	Simpanan nasabah/*Deposits from customers*
Christine Tanoyo	Hubungan keluarga dengan Suzanna Tanojo/*Relative of Suzanna Tanojo*	Simpanan nasabah/*Deposits from customers*
Luciana Tanoyo	Hubungan keluarga dengan Suzanna Tanojo/*Relative of Suzanna Tanojo*	Simpanan nasabah/*Deposits from customers*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank/*Board of Commissioners, Directors and executive officers of the Bank*	Manajemen dan karyawan kunci/ *Key management and employees*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*
Dewan Komisaris, Direksi dan pejabat Eksekutif Entitas Asosiasi/*Board of Commissioners, Directors and executive officers of Associated Entity*	Manajemen dan karyawan kunci/ *Key management and employees*	Simpanan nasabah, pinjaman yang diberikan/*Deposits from customers, loans*

*) Pihak berelasi di tahun 2024

*) *Related party in 2024*

Transaksi dengan pihak-pihak berelasi / ***Transactions with related parties***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut:

Transactions with related parties are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Aset			***Assets***
Pinjaman yang diberikan - bruto (Catatan 11)			*Loans - gross (Note 11)*
PT Tri Daya Investindo	84.806.448	-	*PT Tri Daya Investindo*
PT Sulfindo Adiusaha	65.775.284	78.087.258	*PT Sulfindo Adiusaha*
PT Grha Swahita	19.028.743	23.722.610	*PT Grha Swahita*
PT Merak Energi Indonesia	15.518.866	17.974.599	*PT Merak Energi Indonesia*
PT Victoria Sekuritas Indonesia	8.493.114	-	*PT Victoria Sekuritas Indonesia*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	2.023.387	1.617.225	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank	23.985.095	2.065.419	*Boards of Commissioners, Directors and executive officers of the Bank*
Jumlah pinjaman yang diberikan - bruto	219.630.937	123.467.111	*Total loans - gross*
Persentase terhadap jumlah aset	**0,61%**	**0,40%**	***Percentage from total assets***

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi (lanjutan) / ***Transactions with related parties (continued)***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: (lanjutan) / *Transactions with related parties are as follows: (continued)*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Liabilitas			***Liabilities***
Simpanan nasabah (Catatan 19)			*Deposits from customers (Note 19)*
Giro	158.251.829	209.682.617	*Demand deposits*
Tabungan	27.031.842	33.955.891	*Savings deposits*
Deposito berjangka	383.483.571	323.392.414	*Time deposits*
Negotiable Certificate Deposit	6.388.425	104.919.517	*Negotiable Certificate Deposits*
Jumlah simpanan nasabah	575.155.667	671.950.439	*Total deposits from customers*
Simpanan dari Bank Lain (Catatan 20)			*Deposits from other banks (Note 20)*
Giro	-	532.305	*Demand deposits*
Efek-efek yang diterbitkan (Catatan 22)	538.660.000	147.885.000	*Securities issued (Note 22)*
Jumlah	1.113.815.667	820.367.744	*Total*
Persentase terhadap jumlah liabilitas	**3,50%**	**3,03%**	***Percentage from total liabilities***

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pendapatan bunga (Catatan 32)			*Interest income (Note 32)*
PT Sulfindo Adiusaha	5.870.048	7.948.007	*PT Sulfindo Adiusaha*
PT Merak Energi Indonesia	1.355.568	1.365.636	*PT Merak Energi Indonesia*
PT Grha Swahita	1.148.849	3.652.001	*PT Grha Swahita*
PT Tri Daya Investindo	582.122	-	*PT Tri Daya Investindo*
PT Victoria Sekuritas Indonesia	29.052	-	*PT Victoria Sekuritas Indonesia*
PT Cahaya Medika Health Care	161	2.887	*PT Cahaya Medika Health Care*
PT Victoria Insurance Tbk	-	2.053	*PT Victoria Insurance Tbk*
PT Jaya Bhakti Mandiri	-	1.730	*PT Jaya Bhakti Mandiri*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	1.262.218	310.571	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank	1.027.051	47.328	*Boards of Commissioners, Directors and executive officers of the Bank*
Jumlah	11.275.069	13.330.213	*Total*
Persentase terhadap jumlah pendapatan bunga	**0,49%**	**0,64%**	***Percentage from total interest income***
Beban bunga (Catatan 33)			*Interest expenses (Note 33)*
Giro	6.205.773	13.215.461	*Demand deposits*
Tabungan	804.714	798.248	*Savings deposits*
Deposito berjangka	17.897.451	27.473.806	*Time deposits*
Jumlah	**24.907.938**	**41.487.515**	***Total***
Persentase terhadap jumlah beban bunga	**1,43%**	**2,72%**	***Percentage from total interest expenses***

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi (lanjutan) / ***Transactions with related parties (continued)***

Transaksi-transaksi dengan pihak-pihak berelasi adalah sebagai berikut: (lanjutan) / *Transactions with related parties are as follows: (continued)*

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Beban tenaga kerja (Catatan 37)			***Personnel expenses (Note 37)***
Gaji dan tunjangan Dewan Komisaris	5.503.441	4.973.541	*Salaries and allowances of the Boards of Commissioners*
Gaji dan tunjangan Dewan Direksi	18.958.941	16.706.700	*Salaries and allowances of the Boards of Directors*
Gaji dan tunjangan Pejabat Eksekutif	36.469.655	28.829.719	*Salaries and allowances of the Executive Officers*
Jumlah	**60.932.037**	**50.509.960**	***Total***
Persentase terhadap jumlah beban tenaga kerja	**31,43%**	**28,76%**	***Percentage from total personnel expenses***

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Liabilitas komitmen dan kontinjensi (Catatan 43)			***Liabilities commitments and contingencies (Note 43)***
Fasilitas pinjaman yang belum digunakan			*Unused loans facilities*
PT Grha Swahita	(2.337.668)	(166.240)	*PT Grha Swahita*
PT Cahaya Medika Health Care	(2.000.000)	-	*PT Cahaya Medika Health Care*
PT Victoria Sekuritas Indonesia	(1.506.886)	-	*PT Victoria Sekuritas Indonesia*
Dewan Komisaris, Direksi dan pejabat eksekutif Entitas Asosiasi	(1.790.659)	(3.433.804)	*Boards of Commissioners, Directors and executive officers of Associated Entity*
Dewan Komisaris, Direksi dan pejabat eksekutif Bank	(3.489.833)	-	*Boards of Commissioners, Directors and executive officers of the Bank*
Garansi yang diterbitkan - pihak berelasi			*Guarantees issued - related parties*
PT Victoria Alife Indonesia	-	(271.300)	*PT Victoria Alife Indonesia*
Jumlah	**(11.125.046)**	**(3.871.344)**	***Total***
Persentase terhadap jumlah liabilitas komitmen dan kontinjensi - bersih	**0,14%**	**0,08%**	***Percentage from total commitments and contingencies liabilities - net***

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan) / *INFORMATION OF RELATED PARTIES (continued)*

Transaksi dengan pihak-pihak berelasi (lanjutan) / ***Transactions with related parties (continued)***

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun atas transaksi dengan pihak-pihak berelasi untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024:

The following table summarises the range of contractual interest rates per annum for transactions with related parties for the year ended December 31, 2025 and 2024:

	Tingkat suku bunga/ *Interest rate*,		
	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Aset			***Assets***
Pinjaman yang diberikan - bersih (Catatan 11)	5,25% - 11,00%	5,25% - 10,50%	*Loans - net (Note 11)*
Liabilitas			***Liabilities***
Simpanan nasabah (Catatan 19)			*Deposits from customers (Note 19)*
Giro	0,25% - 5,75%	0,00% - 6,50%	*Demand deposits*
Tabungan	0,25% - 6,00%	0,00% - 5,00%	*Savings deposits*
Deposito berjangka	0,25% - 7,50%	0,25% - 8,00%	*Time deposits*
Negotiable Certificated Deposit	7,00%	6,50% - 7,00%	*Negotiable Certificate of Deposits*
Simpanan dari bank lain (Catatan 20)			*Deposits from other bank (Note 20)*
Giro	0,00%	0,50% - 1,50%	*Demand deposits*
Efek-efek yang diterbitkan (Catatan 22)	9,00% - 11,75%	10,75% - 11,75%	*Securities issued (Note 22)*

Bank memberikan kompensasi kepada Dewan Komisaris, Direksi dan pejabat eksekutif untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 sebagai berikut:

The Bank provided compensation to Board of Commissioners, Directors and executive officers for the year ended December 31, 2025 and 2024 as follows:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Dewan Komisaris:			*Board of Commissioners:*
Gaji	4.118.501	3.908.758	*Salaries*
Tunjangan akhir tahun	387.763	374.357	*Year End Allowances*
Tunjangan Hari Raya	385.149	352.193	*Holiday Entitlements*
Bonus	612.029	338.233	*Bonuses*
Direksi:			*Directors:*
Gaji	14.369.211	13.228.393	*Salaries*
Tunjangan akhir tahun	1.235.714	1.128.572	*Year End Allowances*
Tunjangan Hari Raya	1.157.319	1.019.695	*Holiday Entitlements*
Bonus	2.196.696	1.330.040	*Bonuses*
Pejabat eksekutif:			*Executive officers:*
Gaji	28.323.676	22.766.951	*Salaries*
Tunjangan akhir tahun	2.389.387	1.994.918	*Year End Allowances*
Tunjangan Hari Raya	2.315.867	1.922.027	*Holiday Entitlements*
Bonus	3.440.725	2.145.823	*Bonuses*
Jumlah	**60.932.037**	**50.509.960**	***Total***

42. INFORMASI MENGENAI PIHAK-PIHAK BERELASI (lanjutan)

Transaksi dengan pihak-pihak berelasi (lanjutan)

Tidak ada kompensasi dalam bentuk imbalan pasca kerja, imbalan kerja jangka panjang lainnya, pesangon pemutusan kontrak kerja dan pembayaran berbasis saham kepada Dewan Komisaris dan Direksi.

42. INFORMATION OF RELATED PARTIES (continued)

Transactions with related parties (continued)

There are no compensation of post-employment benefits, other long-term benefits, termination benefits and share-based payment to the Boards of Commisioners and Directors.

43. KOMITMEN DAN KONTINJENSI

Ikhtisar komitmen dan kontinjensi Bank yang dinyatakan dalam nilai kontrak adalah sebagai berikut:

43. COMMITMENTS AND CONTINGENCIES

The following is the summary of the Bank's commitments and contingencies at contractual amounts:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Komitmen			***Commitments***
Liabilitas komitmen:			*Commitment liabilities:*
Fasilitas pinjaman yang belum digunakan:			*Unused loan facilities:*
Pihak berelasi (Catatan 42)	(11.125.046)	(3.600.044)	*Related parties (Note 42)*
Pihak ketiga	(6.811.508.409)	(4.657.963.621)	*Third parties*
Liabilitas komitmen - bersih	(6.822.633.455)	(4.661.563.665)	*Commitment liabilities - net*
Kontinjensi			***Contingencies***
Tagihan kontinjensi:			*Contingent receivables:*
Pendapatan bunga atas pinjaman bermasalah - pihak ketiga	212.799.127	263.554.741	*Interest receivables on non-performing loans - third parties*
Liabilitas kontinjensi:			*Contingent liabilities:*
Garansi yang diterbitkan:			*Guarantees issued:*
Pihak berelasi (Catatan 42)	-	(271.300)	*Related parties (Note 42)*
Pihak ketiga	(179.024.353)	(521.871.689)	*Third parties*
Letter of Credit	(11.624.507)	(169.275.405)	*Letter of Credit*
Kontinjensi - bersih	22.150.267	(427.863.653)	*Contingencies - net*
Jumlah liabilitas komitmen dan kontinjensi - bersih	**(6.800.483.188)**	**(5.089.427.318)**	***Total commitment and contingencies liabilities - net***

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat komitmen dan kontinjensi signifikan lainnya selain komitmen dan kontinjensi yang telah diungkapkan di atas.

As of December 31, 2025 and 2024, there are no significant commitments and contingencies other than the aforementioned commitments and contingencies.

44. PERJANJIAN PENTING

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Sigma Cipta Caraka

Pada tanggal 26 Agustus 2014, Bank dan PT Sigma Cipta Caraka telah menandatangani Perjanjian Aplikasi Terintegrasi Transaksi Manajemen, dimana PT Sigma Cipta Caraka setuju untuk memberikan layanan jasa untuk membuat sistem untuk operasi bisnis Bank.

44. SIGNIFICANT AGREEMENT

Implementation of Application Integrated Transaction Management - PT Sigma Cipta Caraka

On August 26, 2014, Bank and PT Sigma Cipta Caraka have signed Application Integrated Transaction Management, in which PT Sigma Cipta Caraka agrees to distribute Integrated Transaction Management Application for Bank's business operation.

44. PERJANJIAN PENTING (lanjutan)

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Sigma Cipta Caraka (lanjutan)

Berdasarkan perjanjian ini, PT Sigma Cipta Caraka memiliki hak dan kewajiban sebagai berikut:

1. PT Sigma Cipta Caraka berhak mendapatkan pembayaran dari Bank;
2. PT Sigma Cipta Caraka wajib memberikan lisensi aplikasi kepada Bank;
3. PT Sigma Cipta Caraka wajib membuat aplikasi sesuai dengan keinginan Bank;
4. PT Sigma Cipta Caraka wajib membuat laporan kemajuan proses implementasi; dan
5. PT Sigma Cipta Caraka wajib memastikan program telah benar untuk mencegah kesalahan.

Berdasarkan Addendum VI No.461/SCC/BVIC/B/19 tanggal 24 Juli 2019, jangka waktu perjanjian diubah menjadi tanpa jangka waktu hingga salah satu pihak melakukan pengakhiran perjanjian.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2025 dan 2024 adalah sebesar:

44. SIGNIFICANT AGREEMENT (continued)

Implementation of Application Integrated Transaction Management - PT Sigma Cipta Caraka (continued)

Based on this agreement, PT Sigma Cipta Caraka have right and obligation as follows:

1. *PT Sigma Cipta Caraka is entitled to receive payment from the Bank;*
2. *PT Sigma Cipta Caraka is obligated to give the license of the application to the Bank;*
3. *PT Sigma Cipta Caraka is obligated to customize the application according to Bank's request;*
4. *PT Sigma Cipta Caraka is obligated to make official report for implementation process progress; and*
5. *PT Sigma Cipta Caraka is obligated to ensure the programs to prevent errors.*

According to Addendum VI No.461/SCC/BVIC/B/19 dated July 24, 2019, the term of the agreement was changed to no time period until one of the party terminates the agreement.

Service fees paid as of December 31, 2025 and 2024 are amounted:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Rupiah	5.027.080	6.928.248	*Rupiah*

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi

Pada tanggal 21 Juni 2022, Bank dan PT Panen Berkah Solusi telah menandatangani Perjanjian Pemeliharaan Server AS400, dimana PT Panen Berkah Solusi setuju untuk memberikan layanan jasa pemeliharaan server AS400 untuk operasi Bank.

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi

On June 21, 2022, the Bank and PT Panen Berkah Solusi has signed an AS400 Server Maintenance Agreement, whereby PT Panen Berkah Solusi agreed to provide AS400 server maintenance services for the Bank's operations.

44. PERJANJIAN PENTING (lanjutan)

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi (lanjutan)

Berdasarkan perjanjian ini, PT Panen Berkah Solusi memiliki hak dan kewajiban sebagai berikut:

1. PT Panen Berkah Solusi berhak mendapatkan pembayaran dari Bank;
2. PT Panen Berkah Solusi, wajib menyediakan jasa tenaga kerja sesuai kemampuan teknis;
3. PT Panen Berkah Solusi, wajib memberikan informasi tertulis kepada Bank yang diperlukan dalam penyelesaian tugas;
4. PT Panen Berkah Solusi, wajib mengirimkan suku cadang kepada Bank;
5. PT Panen Berkah Solusi, wajib melakukan kunjungan setiap dua bulan untuk melakukan pengecekan pada semua perangkat;
6. PT Panen Berkah Solusi, berhak melakukan penagihan atas jasa penyediaan suku cadang;
7. PT Panen Berkah Solusi, wajib menyediakan semua kebutuhan suku cadang yang diperlukan dalam rangka perbaikan mesin;
8. PT Panen Berkah Solusi bersedia di audit oleh auditor internal Bank atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank; dan
9. PT Panen Berkah Solusi, wajib melaporkan kepada Bank setiap kejadian kritis yang dapat mengakibatkan kerugian/menganggu kelancaran operasional Bank.

Surat perjanjian tertanggal 21 Juni 2022 pada terhadap perjanjian kerja sama antara Bank dan PT Panen Berkah Solusi pada No.016/SPK/PBS/VI/2022 bahwa jangka waktu perjanjian adalah sejak tanggal 21 Juni 2022 sampai dengan 20 Juni 2023, sebagaimana telah diubah pada Adendum perjanjian No. 0309/PBS/SPK/VI/2025 tanggal 20 Juni 2025, jangka waktu perjanjian adalah sejak tanggal 20 Juni 2025 sampai dengan 19 Juni 2026.

44. SIGNIFICANT AGREEMENT (continued)

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi (continued)

Based on this agreement, PT Panen Berkah Solusi has the following rights and obligations:

1. *PT Panen Berkah Solusi is entitled to receive payment from the Bank;*
2. *PT Panen Berkah Solusi, is required to provide labor services according to technical capabilities;*
3. *PT Panen Berkah Solusi, is required to provide written information to the Bank that is needed in completing the task;*
4. *PT Panen Berkah Solusi, must send spare parts to the Bank;*
5. *PT Panen Berkah Solusi, must visit every two months to check all devices;*
6. *PT Panen Berkah Solusi, has the right to bill for spare parts supply services;*
7. *PT Panen Berkah Solusi, must provide all the spare parts needed for machine repair;*
8. *PT Panen Berkah Solusi is willing to be audited by the Bank's internal auditor or the Financial Services Authority or an external party appointed by the Bank; and*
9. *PT Panen Berkah Solusi, is required to report to the Bank every critical incident that may result in losses/disturb the smooth operation of the Bank.*

The agreement dated June 21, 2022 on the agreement between the Bank and PT Panen Berkah Solusi under No.016/SPK/PBS/VI/2022 states that the term
of the agreement is from June 21, 2022 until June 20, 2023, as amended in the Agreement Addendum No. 0309/PBS/SPK/VI/2025 dated June 20, 2025, the term of the agreement is from June 20, 2025 until June 19, 2026.

44. PERJANJIAN PENTING (lanjutan)

Perjanjian Implementasi Sistem Aplikasi Terintegrasi Transaksi Manajemen - PT Panen Berkah Solusi (lanjutan)

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2025 dan 2024 yang termasuk dalam perjanjian ini adalah sebesar:

44. SIGNIFICANT AGREEMENT (continued)

Implementation of Application Integrated Transaction Management - PT Panen Berkah Solusi (continued)

Service fees paid as of December 31, 2025 and 2024 are amounted included in this agreement are amounted:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Rupiah	184.210	640.494	*Rupiah*

Perjanjian Kerjasama *Revamp Mobile Banking*, *Internet Banking*, dan *Internet Banking* Bisnis - PT Infosys Solusi Terpadu

Pada tanggal 20 Agustus 2021, Bank dan PT Infosys Solusi Terpadu telah menandatangani Perjanjian Kerjasama *Revamp Mobile Banking, Internet Banking*, dan *Internet Banking* Bisnis, dimana PT Infosys Solusi Terpadu setuju untuk memberikan layanan *Revamp Mobile Banking*, *Internet Banking,* dan *Internet Banking* Bisnis untuk operasi Bank.

Berdasarkan perjanjian ini, PT Infosys Solusi Terpadu memiliki hak dan kewajiban sebagai berikut:

1. PT Infosys Solusi Terpadu berhak mendapatkan pembayaran dari Bank;
2. PT Infosys Solusi Terpadu wajib menjamin ketersediaan sumber daya untuk pengembangan aplikasi *Digital Application platform*;
3. PT Infosys Solusi Terpadu wajib memberikan layanan *support* dan *maintenance* selama masa *post implementation* maksimal 1 (satu) bulan setelah *Go-Live*;
4. PT Infosys Solusi Terpadu wajib memberikan garansi aplikasi selama 6 (enam) bulan, setelah *Live Production*;
5. PT Infosys Solusi Terpadu wajib memberikan *support* 7 x 24 jam apabila terjadi permasalahan;
6. PT Infosys Solusi Terpadu wajib menyelesaikan pekerjaan sesuai dengan jangka waktu yang telah ditentukan;
7. PT Infosys Solusi Terpadu wajib memberikan dokumentasi perangkat lunak, termasuk *source code* serta dokumentasi sistem dan petunjuk teknis penggunaan, termasuk didalamnya untuk memberikan instalasi *guide version* di mesin *development*;
8. PT Infosys Terpadu menjamin bahwa perangkat lunak tidak mengandung *backdoor* yang memungkinkan akses oleh pihak yang tidak berwenang ke dalam sistem dan data Bank;

Agreement of Revamp of Mobile Banking, Internet Banking, and Business Internet Banking - PT Infosys Solusi Terpadu

On August 20, 2021, the Bank and PT Infosys Solusi Terpadu signed a Cooperation Agreement for the Revamp of Mobile Banking, Internet Banking, and Business Internet Banking, whereby PT Infosys Solusi Terpadu agreed to provide revamp services for Mobile Banking, Internet Banking, and Business Internet Banking for the Bank's operations.

Based on this agreement, PT Infosys Solusi Terpadu has the following rights and obligations:

1. *PT Infosys Solusi Terpadu is entitled to receive payment from the Bank;*
2. *PT Infosys Solusi Terpadu is required to ensure the availability of resources for the development of the Digital Application platform;*
3. *PT Infosys Solusi Terpadu is required to provide support and maintenance services during the post-implementation period for a maximum of 1 (one) month after Go-Live;*
4. *PT Infosys Solusi Terpadu is required to provide an application warranty for 6 (six) months after Live Production;*
5. *PT Infosys Solusi Terpadu is required to provide 24/7 support in the event of any issues;*
6. *PT Infosys Solusi Terpadu is required to complete the work within the specified timeframe;*
7. *PT Infosys Solusi Terpadu is required to provide software documentation, including source code, system documentation, and technical usage guidelines, as well as an installation guide version for the development environment;*
8. *PT Infosys Solusi Terpadu guarantees that the software does not contain any backdoor that would allow unauthorised access to the Bank's systems and data;*

44. PERJANJIAN PENTING (lanjutan)

Perjanjian Kerjasama Revamp *Mobile Banking*, *Internet Banking*, dan *Internet Banking* Bisnis - PT Infosys Solusi Terpadu (lanjutan)

9. PT Infosys Terpadu wajib mendapatkan persetujuan tertulis dari Bank, jika melakukan pengalihan sebagian pekerjaan kepada subkontraktor;
10. PT Infosys Terpadu bersedia diaudit oleh auditor internal Bank, atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank; dan
11. PT Infosys Terpadu wajib melaporkan setiap kejadian kritis yang dapat mengakibatkan kerugian dan/atau mengganggu kelancaran operasional Bank.

Berdasarkan Addendum Pertama No. 004/DIR-VICT/PKS/11/24 tanggal 28 November 2024, terdapat perubahan tentang Persyaratan Teknis dan penambahan ketentuan mengenai Timeline pengerjaan dalam perjanjian kerjasama ini. Jangka waktu perjanjian adalah tiga tahun sejak penandatangan perjanjian dengan perpanjangan jangka waktu awal akan diperpanjang secara otomatis setiap kali untuk jangka waktu 1 (satu) tahun berikutnya.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2025 dan 2024 adalah sebesar:

44. SIGNIFICANT AGREEMENT (continued)

Agreement of Revamp of Mobile Banking, Internet Banking, and Business Internet Banking - PT Infosys Solusi Terpadu (continued)

9. PT Infosys Solusi Terpadu is required to obtain written approval from the Bank if it intends to delegate part of the work to a subcontractor;

10. PT Infosys Solusi Terpadu agrees to be audited by the Bank's internal auditor, the Financial Services Authority, or an external party appointed by the Bank; and
11. PT Infosys Solusi Terpadu is required to report any critical incidents that may result in losses and/or disrupt the Bank's operations.

Based on the First Addendum No. 004/DIR-VICT/PKS/11/24 dated November 28, 2024, there are changes to the Technical Requirements and the addition of provisions regarding the Project Timeline in this cooperation agreement. The term of the agreement is three years from the signing date, with the initial term being automatically extended each time for an additional 1 (one) year.

Service fees paid as of December 31, 2025 and 2024 are amounted:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Rupiah	1.455.697	3.881.149	*Rupiah*

Perjanjian Pemeliharaan Sistem dan Pembelian Lisensi *Treasury* Opics – PT Sinergi Inti Solusi

Pada tanggal 22 Februari 2023, Bank dan PT Sinergi Inti Solusi telah menandatangani Perjanjian Kerjasama Pemeliharaan Sistem dan Pembelian Lisensi *Treasury Opics*, dimana PT Sinergi Inti Solusi setuju untuk memberikan layanan pemeliharaan sistem dan lisensi *Treasury Opics*.

System Maintenance and Purchase License Agreement of Treasury Opics – PT Sinergi Inti Solusi

On February 22, 2023, the Bank and PT Sinergi Inti Solusi signed a Cooperation Agreement for System Maintenance and Purchase License Agreement of Treasury Opics, whereby PT Sinergi Inti Solusi agreed to provide services for system maintenance and license agreement of Treasury Opics.

44. PERJANJIAN PENTING (lanjutan)

Perjanjian Pemeliharaan Sistem dan Pembelian Lisensi *Treasury* Opics – PT Sinergi Inti Solusi (lanjutan)

Berdasarkan perjanjian ini, PT Sinergi Inti Solusi memiliki hak dan kewajiban sebagai berikut :

1. PT Sinergi Inti Solusi berhak mendapatkan pembayaran dari Bank;
2. PT Sinergi Inti Solusi akan menyediakan layanan kepada Bank dengan syarat-syarat dan ketentuan-ketentuan sesuai kesepakatan;
3. PT Sinergi Inti Solusi memberikan lisensi kepada Bank atas sistem dan bahan-bahan pendukung;
4. PT Sinergi Inti Solusi akan melakukan pemeliharaan *corrective* dalam waktu 2 (dua) minggu dan penempatan 2 (dua) PIC di Bank untuk mencegah terjadinya *error* dalam hal pemeliharaan;
5. PT Sinergi Inti Solusi menjamin bahwa sistem akan berfungsi sesuai dengan bahan pendukung;
6. PT Sinergi Inti Solusi akan menyusun *log* pemeliharaan setelah menyelesaikan layanan pemeliharaan dan/atau perbaikan, dan menyerahkan *log* kepada Bank setiap bulan;
7. PT Sinergi Inti Solusi akan menyelesaikan layanan dalam waktu 24 jam setelah menerima pemberitahuan *error*. Jika layanan pemeliharaan dan/atau perbaikan tidak dapat diselesaikan dalam waktu 4 (empat) jam, maka PT Sinergi Inti Solusi akan menyediakan peralatan alternatif dan tidak akan mengenakan biaya tambahan kepada klien;
8. PT Sinergi Inti Solusi akan bertanggung jawab atas segala kerusakan yang diakibatkan oleh peristiwa yang terkait dengan Perjanjian ini, dan akan memberikan kompensasi kepada Bank atau pihak ketiga dari setiap biaya yang muncul; dan
9. PT Sinergi Inti Solusi bersedia diaudit oleh auditor internal Bank, atau Otoritas Jasa Keuangan atau pihak eksternal yang ditunjuk oleh Bank.

Berdasarkan Perjanjian Pertama No 001/DIR-VICT/PKS/02/2023 tanggal 22 Februari 2024, jangka waktu perjanjian adalah lima tahun sejak 1 Februari 2024 sampai 31 Januari 2029.

Biaya jasa yang telah dibayarkan sampai dengan 31 Desember 2025 dan 2024 adalah sebesar:

44. SIGNIFICANT AGREEMENT (continued)

System Maintenance and Purchase License Agreement of Treasury Opics – PT Sinergi Inti Solusi (continued)

Based on this agreement, PT Sinergi Inti Solusi has the following rights and obligations:

1. *PT Sinergi Inti Solusi is entitled to receive payment from the Bank;*
2. *PT Sinergi Inti Solusi will provide services to the Bank under the terms and conditions agreed upon;*
3. *PT Sinergi Inti Solusi grants the Bank a license for the system and supporting materials;*
4. *PT Sinergi Inti Solusi will perform corrective maintenance within 2 (two) weeks and place 2 (two) PICs at the Bank to prevent errors during maintenance;*
5. *PT Sinergi Inti Solusi guarantees that the system will function as per the supporting materials;*
6. *PT Sinergi Inti Solusi will prepare a maintenance log after completing the maintenance and/or repair services and submit the log to the Bank every month;*
7. *PT Sinergi Inti Solusi will complete the service within 24 hours after receiving an error notification. If the maintenance and/or repair service cannot be completed within 4 (four) hours, PT Sinergi Inti Solusi will provide alternative equipment and will not charge any additional fees to the client;*
8. *PT Sinergi Inti Solusi will be responsible for any damages caused by events related to this Agreement and will compensate the Bank or third parties for any costs incurred; and*
9. *PT Sinergi Inti Solusi agrees to be audited by the Bank's internal auditor, the Financial Services Authority, or an external party appointed by the Bank.*

Based on the First Agreement No. 001/DIR-VICT/PKS/02/2023 dated February 22, 2024, the term of the agreement is five years, start from February 1, 2024, to January 31, 2029.

Service fees paid as of December 31, 2025 and 2024 are amounted:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Rupiah	2.209.860	4.883.440	*Rupiah*

45. SEGMEN OPERASI / *45. OPERATING SEGMENT*

Berikut adalah informasi segmen Bank berdasarkan segmen operasi:

The following is the segment information of the Bank based on operating segments:

	Untuk tahun yang berakhir pada tanggal 31 Desember/ *For the year ended December 31,*		
	2025	**2024**	
Pendapatan bunga - bersih	558.717.259	548.600.548	*Interest income - net*
Pendapatan operasional lainnya	533.276.856	365.735.651	*Other operating income*
Beban operasional lainnya	(870.025.599)	(621.366.151)	*Other operating expense*
Laba operasional	221.968.516	292.970.048	*Income from operations*
Jumlah aset	36.201.697.084	31.045.989.252	*Total assets*
Jumlah liabilitas	31.832.775.864	27.112.529.594	*Total liabilities*

Berikut ini adalah informasi segmen Bank berdasarkan daerah geografis:

The following is the business segment information of the Bank based on geographical area:

	Untuk tahun yang berakhir pada tanggal/ *For the year ended* 31 Desember/*December 31, 2025*					
	Jadetabek/ *Jadetabek*	**Jawa Barat/ *West Java***	**Jawa Tengah & Jawa Timur /*Central & East Java***	**Luar Jawa/ *Non Java***	**Jumlah/ *Total***	
Pendapatan bunga - bersih	530.513.646	11.125.097	57.539.847	(40.461.331)	558.717.259	*Interest income - net*
Pendapatan operasional lainnya	521.765.636	2.235.509	4.631.117	4.644.594	533.276.856	*Other operating income*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(245.874.215)	(49.198.099)	(19.676.296)	(26.670.462)	(341.419.072)	*Provision for impairment losses on financial and non-financial assets*
Beban umum dan administrasi, tenaga kerja, keuntungan/(kerugian) atas perubahan nilai wajar dan lain-lain	(483.573.721)	(11.135.905)	(20.778.871)	(13.118.030)	(528.606.527)	*General and administrative expenses, personnel expenses,unrealised gain /(loss) changes of fair value and others*
Laba (rugi) operasional	322.831.346	(46.973.398)	21.715.797	(75.605.229)	221.968.516	*Profit (loss) from operations*
Beban non operasional - bersih	(59.724.200)	2.895	63.180	43.224	(59.614.901)	*Non-operating expense - net*
Laba (rugi) sebelum beban pajak penghasilan	263.107.146	(46.970.503)	21.778.977	(75.562.005)	162.353.615	*Profit (loss) before income tax expense*
Beban pajak penghasilan	(30.608.688)	-	-	-	(30.608.688)	*Income tax expense*
Laba/(rugi) bersih tahun berjalan	232.498.458	(46.970.503)	21.778.977	(75.562.005)	131.744.927	*Profit/(loss) for the year*
Jumlah aset	33.969.230.937	364.483.211	1.434.364.092	433.618.844	36.201.697.084	*Total assets*
Jumlah liabilitas	28.849.025.318	656.254.319	1.067.725.931	1.259.770.296	31.832.775.864	*Total liabilities*

45. SEGMEN OPERASI (lanjutan)

Berikut adalah informasi segmen Bank berdasarkan segmen operasi: (lanjutan)

45. OPERATING SEGMENT (continued)

The following is the segment information of the Bank based on operating segments: (continued)

	Untuk tahun yang berakhir pada tanggal/ *For the year ended* 31 Desember/*December 31, 2024*					
	Jadetabek/ *Jadetabek*	**Jawa Barat/ *West Java***	**Jawa Tengah & Jawa Timur /*Central & East Java***	**Luar Jawa/ *Non Java***	**Jumlah/ *Total***	
Pendapatan bunga - bersih	549.422.800	11.105.744	20.834.507	(32.762.503)	548.600.548	*Interest income - net*
Pendapatan operasional lainnya	345.167.012	1.479.627	8.440.580	10.648.432	365.735.651	*Other operating income*
Beban penyisihan kerugian penurunan nilai aset keuangan dan non-keuangan	(88.683.185)	(352.508)	(5.464.059)	(20.803.343)	(115.303.095)	*Provision for impairment losses on financial and non-financial assets*
Beban umum dan administrasi, tenaga kerja, kerugian atas perubahan nilai wajar dan lain-lain	(464.044.674)	(9.807.571)	(20.132.236)	(12.078.575)	(506.063.056)	*General and administrative expenses, personnel expenses, unrealised loss changes of fair value and others*
Laba (rugi) operasional	341.861.953	2.425.292	3.678.792	(54.995.989)	292.970.048	*Profit (loss) from operations*
Beban non operasional - bersih	(144.513.536)	425	161.267	41.920	(144.309.924)	*Non-operating expense - net*
Laba (rugi) sebelum beban pajak penghasilan	197.348.417	2.425.717	3.840.059	(54.954.069)	148.660.124	*Profit (loss) before income tax expense*
Beban pajak penghasilan	(30.800.886)	-	-	-	(30.800.886)	*Income tax expense*
Laba/(rugi) bersih berjalan	166.547.531	2.425.717	3.840.059	(54.954.069)	117.859.238	*Profit/(loss) for the year*
Jumlah aset	29.256.279.747	292.161.024	1.159.177.057	338.371.424	31.045.989.252	*Total assets*
Jumlah liabilitas	24.853.241.727	318.504.148	1.017.510.824	923.272.895	27.112.529.594	*Total liabilities*

46. JAMINAN PEMERINTAH TERHADAP KEWAJIBAN PEMBAYARAN BANK UMUM

Berdasarkan Undang-Undang Republik Indonesia No. 24 tanggal 22 September 2004, efektif sejak tanggal 22 September 2005, Lembaga Penjamin Simpanan (LPS) dibentuk untuk menjamin kewajiban tertentu bank-bank umum berdasarkan program penjaminan yang berlaku. Undang-Undang tersebut telah diubah dengan Peraturan Pemerintah sebagai Pengganti Undang-Undang No. 3 Tahun 2008, yang mana telah ditetapkan menjadi Undang-Undang sejak tanggal 13 Januari 2009 berdasarkan Undang-Undang Republik Indonesia No. 7 Tahun 2009.

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66/2008 tanggal 13 Oktober 2008 mengenai besarnya nilai simpanan yang dijamin LPS, pada tanggal 31 Desember 2025 dan 2024, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000.000 untuk nasabah per bank.

Bank adalah peserta dari program penjaminan tersebut dan beban premi penjaminan Pemerintah yang dibayar selama tahun yang berakhir tanggal 31 Desember 2025 dan 2024 masing-masing adalah sebesar Rp45.707.673 dan 43.691.208.

46. GOVERNMENT GUARANTEE ON OBLIGATIONS OF PRIVATE BANKS

Based on Law No. 24 dated September 22, 2004, effective September 22, 2005, Indonesia Deposit Insurance Corporation (LPS) was established to provide guarantee on certain deposits from customers based on prevailing guarantee schemes. The law was changed with the Government Regulation as at the Replacement of Law No. 3 Year 2008, which was stipulated as a law since January 13, 2009 based on the Republic of Indonesia Law No. 7 Year 2009.

Based on Government of Republic of Indonesia Regulation No. 66/2008 dated October 13, 2008 regarding the deposit amount guaranteed by LPS, as of December 31, 2025 and 2024, the deposit amount guaranteed by LPS for every customer in a bank was a maximum of Rp2,000,000.

The Bank is a participant of this government guarantee program and the premium paid for the year ended December 31, 2025 and 2024 amounted to Rp45,707,673 and Rp43,691,208, respectively.

47. MANAJEMEN RISIKO

Bank telah menerapkan manajemen risiko yang independen dan sesuai dengan standar yang mengacu pada POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum.

Kegiatan usaha Bank senantiasa dihadapkan pada risiko-risiko yang berkaitan erat dengan fungsinya sebagai lembaga intermediasi keuangan. Oleh karena itu, kegiatan operasional Bank dikelola dengan baik supaya tidak menimbulkan kerugian. Di dalam melaksanakan strategi bisnis Bank, maka manajemen berupaya untuk dapat menyelaraskan antara:

- Pertumbuhan bisnis dan peningkatan pangsa pasar kredit dan portofolio pendanaan.
- Peningkatkan efisiensi operasional perbankan.
- Menjaga tingkat kebutuhan modal minimum sesuai ketentuan otoritas.
- Implementasi manajemen risiko yang berorientasi bisnis.

Sebagai lembaga intermediasi keuangan, Bank menyadari bahwa semakin kompleksnya kegiatan usaha yang diikuti dengan perkembangan lingkungan internal maupun eksternal sehingga meningkatkan risiko dalam menjalankan kegiatan usahanya. Menyadari akan risiko yang dihadapi, Bank harus menerapkan kebijakan manajemen risiko yang baik dan dapat beradaptasi dengan perubahan yang terjadi dan meningkatkan praktek tata kelola yang sehat (*Good Corporate Governance*) pada keseluruhan lingkup aktivitas usaha.

Penerapan manajemen risiko yang efektif dengan mempertimbangkan segala aspek dan prinsip kehati-hatian (*prudential principles*) ini bertujuan untuk memastikan bahwa potensi yang timbul dalam kegiatan usahanya dapat diidentifikasi, diukur, dipantau, dan dimonitor akan memberikan manfaat berupa peningkatan kepercayaan *stakeholder*.

Dalam menunjang penerapan manajemen risiko, Bank senantiasa berupaya meningkatkan pengawasan aktif dari Dewan Komisaris dan Direksi, antara lain melalui unit kerja dan komite untuk menunjang proses pengendalian risiko. Hal ini diwujudkan dengan adanya Satuan Kerja Manajemen Risiko (SKMR) di bawah wadah Komite Manajemen Risiko yang berwenang dan bertanggung jawab dalam menyusun dan menetapkan kebijakan manajemen risiko serta perubahannya termasuk strategi manajemen risiko dan rencana kontinjensi apabila terjadi kondisi yang tidak diinginkan.

47. RISK MANAGEMENT

The Bank has implemented independent risk management and in accordance with standards that refer to POJK No. 18/POJK.03/2016 dated March 16, 2016 regarding the Implementation of Risk Management for Commercial Banks.

Bank's business activities always faced with risks that are closely related to its function as a financial intermediary. Therefore, the Bank's operations are properly managed so it could prevent any harm. In the performance of the Bank's business strategy, management seeks to harmonise between:

- *Business growth and increased market share of credit and financing portfolios.*
- *Increasing the efficiency of banking operations.*
- *Maintain the level of minimum capital requirements pursuant to the authority.*
- *Implementation of business-oriented risk management.*

As a financial intermediary institution, the Bank realises that the business activity is more complex and also depends with development of internal and external conditions that increase the Bank 's risk in conducting its business activities. Realising the risk it faces, the Bank must apply good risk management policy that can adapt with the changes and also enhance the Good Corporate Governance Practice in the whole activities of the Bank.

The effective application of risk management by considering all aspects and prudential principles which has objective to ensure that potential arises in conducting its business activities can be identified, measured, reviewed and monitored will give a benefit to increase stakeholder trust to the Bank.

In supporting the implementation of risk management, the Bank continuously improve the active monitoring from the Boards of Commissioners and Directors, including establishing several permanent working units and committee to support risks control process. This is implemented by establishing Risk Management Unit (SKMR) under Risk Management Committee who authorise and responsible to prepare and decide risk management policy and its changes including risk management strategy and contingency plan if an abnormal condition happens.

47. MANAJEMEN RISIKO (lanjutan)

Selain hal tersebut di atas, terdapat komite lain yang bertugas untuk menangani risiko secara lebih spesifik, yaitu antara lain Komite Kredit Tingkat Direksi (KKD), *Assets and Liabilities Committee* (ALCO), Komite Teknologi Sistem Informasi, sedangkan pada level Dewan Komisaris terdapat Komite Pemantau Risiko, Komite Nominasi dan Remunerasi, Komite Audit dan Komite Tata Kelola Terintegrasi.

Semua Dewan Komisaris dan Direksi telah mengikuti Ujian Sertifikasi Manajemen Risiko yang diselenggarakan oleh Badan Sertifikasi Manajemen Risiko dan Lembaga Sertifikasi Profesi Perbankan.

Seiring dengan perkembangan globalisasi dan teknologi informasi, Lembaga Jasa Keuangan (LJK) merupakan salah satu industri yang memiliki sistem keuangan yang sangat kompleks, dinamis, dan saling terkait antar masing-masing sektor jasa keuangan baik dalam produk dan kelembagaan, maupun kepemilikan yang menyebabkan meningkatnya eksposur risiko. Menghadapi kondisi tersebut, penerapan manajemen risiko akan dilakukan secara terintegrasi dengan memperhatikan seluruh risiko, baik yang berasal dari perusahaan anak dan perusahaan terelasi (*sister company*), maupun entitas lainnya yang tergabung dalam suatu konglomerasi keuangan.

Manajemen Risiko Terintegrasi telah diterapkan secara komprehensif dan efektif sesuai POJK No. 17/POJK.03/2014 dan SEOJK No. 14/SEOJK.03/2015 tentang Penerapan Manajemen Risiko Terintegrasi Bagi Konglomerasi Keuangan. Bank telah ditunjuk sebagai Entitas Utama dalam hal Pengawasan Terintegrasi Konglomerasi Keuangan Grup Victoria.

Dalam menunjang penerapan manajemen risiko terintegrasi, maka Bank berupaya meningkatkan pengawasan aktif Dewan Komisaris dan Direksi, antara lain melalui Satuan Kerja Manajemen Risiko Terintegrasi (SKMRT) di bawah wadah Komite Manajemen Risiko Terintegrasi, sedangkan pada level Dewan Komisaris terdapat Komite Tata Kelola Terintegrasi.

47. RISK MANAGEMENT (continued)

Besides the above matters, there are other committee to handle more specific risks, such as Credit Committee at Board of Directors level (KKD), Assets and Liabilities Committee (ALCO), Information System Technology Committee, whereas at the Board of Commissioners level, there are Risk Monitoring Committee, Nomination and Remuneration Committee, Audit Committee and Integrated Corporate Governance Commitee.

All of the Boards of Commissioners and Directors passed the examination of Risk Management Certification that was held by the Board of Risk the Management Certification and Banking Professional Certification Institute.

As a response with the development of globalisation and information technology, Financial Services Institution (LJK) is one of industry which has a complex, dynamic and inter-related between each financial sector, both in product and organisation, and ownership which can increase the risk exposure. Facing this circumstances, the implementation of risk management will be performed integratedly by concerning all the risks, including from subsidiary and sister companies, and other financial entities included in one financial conglomeration.

Integrated Risk Management has been implemented comprehensively and effectively in accordance with POJK No. 17/POJK.03/2014 and SEOJK No. 14/SEOJK.03/2015 about Implementation of Integrated Risk Management for Financial Conglomeration. The Bank has been appointed as the main entity in the Integrated Monitoring of Financial Conglomeration is Victoria Group.

In supporting the implementation of integrated risk management, Bank encourage the active monitoring by Board of Directors and Board of Commissioners, such as through SKMRT under supervision of Integrated Risk Monitoring Committee, whereas at the Board of Commissioners level through the Integrated Corporate Governance Committee.

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit

Risiko kredit adalah risiko yang terjadi akibat kegagalan debitur dan/atau pihak lawan (*counterparty*) dalam memenuhi kewajiban mereka. Tujuan dari pengelolaan risiko kredit adalah untuk mengendalikan dan mengelola eksposur risiko kredit dalam parameter yang dapat diterima, sekaligus memaksimalkan *return on risk*.

Dalam mengelola risiko kredit, Bank telah memiliki kebijakan dan pedoman perkreditan, yang disempurnakan secara berkala, dengan tetap didasarkan pada prinsip pengelolaan risiko yang independen sesuai dengan peraturan OJK dan peraturan eksternal lainnya dan kebijakan manajemen risiko yang terkait dengan pemberian pinjaman. Pengelolaan risiko kredit mencakup aktivitas penyaluran kredit serta eksposur risiko kredit lainnya seperti penempatan, pembelian efek-efek dan penyertaan, yang dikelola secara komprehensif baik pada tingkat portofolio maupun transaksi.

Bank melakukan evaluasi atas tingkat risiko kredit terkait pemberian fasilitas kepada nasabah atau proyek dengan mempertimbangkan berbagai faktor, antara lain sebagai berikut:

i. Historis dan proyeksi kondisi keuangan, termasuk laporan posisi keuangan, laporan laba rugi, dan laporan arus kas nasabah;
ii. Riwayat hubungan kredit;
iii. Kualitas, kinerja dan pengalaman dari pengelolaan nasabah;
iv. Sektor industri nasabah;
v. Kualitas agunan debitur, baik berupa aset berwujud maupun agunan setara kas;
vi. Posisi nasabah dalam persaingan industri sejenis; serta
vii. Kondisi ekonomi secara umum.

Terhadap eksposur risiko kredit yang lebih khusus seperti kredit perorangan, fasilitas antar bank dan sebagainya, Bank melakukan evaluasi secara tersendiri dengan menggunakan faktor yang mungkin berbeda, sesuai dengan karakteristik spesifik dari setiap jenis eksposur. Proses persetujuan fasilitas dengan eksposur risiko kredit dilakukan berdasarkan prinsip bahwa setiap fasilitas dan eksposur risiko kredit harus diproses melalui komite kredit dan/atau komite lainnya.

47. RISK MANAGEMENT (continued)

Credit risk

Credit risk is the risk by debtors and/or counterparty's failure to fulfill their obligations. The objective of credit risk management is to control and manage credit risk exposures within acceptable parameters, while optimising the return on risk.

In managing credit risk, the Bank has credit policies and standard operations, that are enhanced periodically in accordance with independent risk management principles based on OJK regulations and other external regulatory and risk management policies related to credit. Management of credit risk include lending activities and other credit risk exposures such as placement, purchase of securities and investments, which are managed comprehensively at both portfolio and transaction.

The Bank evaluates the credit risk level related to financing the customers or projects by considering various factors, which include the following:

i. Historical and projected financial condition, including statement of financial position, profit or loss, and statement of cash flows of the customers;
ii. Credit history;
iii. Quality, performance and experience of the customer's management;
iv. Customer's industry sector;
v. Debtor's collateral quality, both in form of tangible assets or cash equivalents;
vi. Customer's competitive position in the industry; and
vii. General economic conditions.

In relation to the specific credit risk exposure such as individual credit, inter-bank facility and others, the Bank separately evaluates based on other factors that may be different, according to the specific characteristics of each exposure. The approval process of facility with credit risk exposure are executed based on a principal that each facility and credit risk exposure approval must be processed through the credit committee and/or other committee.

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

Selain itu, pengelolaan risiko kredit yang lebih spesifik juga dilakukan atas portofolio pinjaman yang bermasalah maupun eksposur risiko kredit lain. Upaya yang dilakukan di antaranya adalah restrukturisasi fasilitas pinjaman yang bermasalah, pengambilalihan agunan, dan pembentukan cadangan untuk menutup potensi kerugian, hingga pelaksanaan hapus buku. Bank telah menjalankan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko yang mencakup profil risiko kredit secara komprehensif. Dalam rangka pengendalian risiko kredit secara komprehensif, Bank terus meninjau dan menyempurnakan pelaksanaan fungsi pengendalian risiko kredit.

Manajemen risiko kredit diarahkan untuk meningkatkan keseimbangan antara ekspansi kredit yang sehat dengan pengelolaan pinjaman yang berprinsip kehati-hatian (*prudent*) agar terhindar dari risiko penurunan kualitas kredit atau menjadi *Non Performing Loan* (NPL), serta mengoptimalkan penggunaan modal yang dialokasikan untuk risiko kredit.

i. Pengukuran risiko kredit

Dalam mengukur risiko kredit untuk pinjaman yang diberikan, Bank mempertimbangkan estimasi kerugian saat debitur kemungkinan tidak dapat memenuhi kewajibannya dan estimasi kerugian atas kewajiban debitur yang telah wanprestasi. Untuk mengelola dan memantau risiko atas penyaluran pinjaman, secara rutin Bank melakukan analisis terhadap portofolio pinjaman dan segmentasi bisnis berdasarkan kualitas kredit dari debitur.

ii. Pengendalian batas risiko dan kebijakan mitigasi

Untuk menghindari risiko konsentrasi kredit, Bank menetapkan limit eksposur untuk setiap nasabah baik pihak berelasi maupun pihak ketiga dalam kebijakan batas maksimum pemberian pinjaman.

Bank mengelola, membatasi, dan mengendalikan konsentrasi risiko kredit, secara khusus terhadap debitur individu maupun kelompok, dan industri maupun geografis.

Batas pemberian pinjaman ditelaah mengikuti perubahan pada kondisi pasar dan ekonomi dan evaluasi kredit secara periodik dan penilaian atas kemungkinan wanprestasi.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

Furthermore, specific credit risk management is performed on non-performing loan portfolio and other credit risk exposures. Such efforts, among others, are restructuring on non-performing loans, foreclosing assets and providing allowances to cover potential losses, and write-off. The Bank has identified, measured, monitored, and controlled risks which covers credit risk profile in a comprehensive risk management. In order to control credit risk in a comprehensive manner, the Bank continues to review and accomplish the implementation of credit risk control function.

Credit risk management is mainly to improve the balance of credit expansion and the prudent credit management that could mitigate the risk of the deterioration of loan quality or loans from becoming Non Performing Loan (NPL), and to optimise the use of capital allocated for the credit risk.

i. Credit risk measurement

In measuring credit risk for loans, the Bank considers the estimated losses when debtor may be unable to meet its obligations and estimated losses on defaulting debtor's liabilities. To manage and monitor the credit risk, the Bank conducts a regular analysis of the loan portfolio and business segmentation based on the credit quality of debtor.

ii. Risk limit control and mitigation policies

To minimise the credit concentration risk, the Bank sets an exposure limit to each related and third parties as mentioned in the maximum lending limit policy.

The Bank manages, limits, and controls the credit concentration risk, in particular, to individual counterparties and groups, and to industries and geographies.

Lending limits are reviewed in the light of changing market and economic conditions and periodic credit reviews and assessments of probability of default.

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

ii. Pengendalian batas risiko dan kebijakan mitigasi (lanjutan)

Dalam proses pengajuan pinjaman, pembelian efek-efek maupun penempatan pada bank lain, Bank menetapkan *dual control* dalam rangka *four eyes principles* yang melibatkan petugas pemasaran, petugas pemeriksa dan pejabat yang berwenang.

Beberapa pengendalian spesifik lainnya dan pengukuran mitigasi dijelaskan di bawah ini:

Agunan

Pengelolaan risiko kredit terhadap pinjaman yang diberikan tidak hanya menjaga kualitas pinjaman namun juga memitigasi risiko dengan tambahan aset sebagai jaminan atas kewajiban kontraktual debitur. Beberapa jenis agunan yang diterima dalam rangka memitigasi risiko kredit antara lain:

- Kas (Deposito)
- Tanah dan/atau bangunan
- Mesin dan peralatan
- Kendaraan bermotor
- Piutang
- Persediaan
- Garansi perorangan/Perusahaan/Bank

iii. Risiko kredit maksimum

Untuk aset keuangan yang diakui di laporan posisi keuangan, eksposur maksimum terhadap risiko kredit sama dengan nilai tercatat. Untuk bank garansi, eksposur maksimum terhadap risiko kredit adalah nilai maksimum yang harus dibayarkan oleh Bank jika liabilitas atas bank garansi terjadi. Untuk fasilitas pinjaman kepada nasabah yang belum digunakan, eksposur maksimum terhadap risiko kredit adalah sebesar komitmen tersebut.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

ii. Risk limit control and mitigation policies (continued)

In the loan application process, purchase of securities and placement with other banks, the Bank sets dual control as part of four eyes principles which involve marketing officers, supervisors and authorised approvers.

Some other specific controls and the mitigation measurement are explained as follows:

Collateral

Risk management of loans, not only maintain loans quality but also to mitigate the risk with additional assets as collateral to cover financial contractual obligation of debtors. Some of acceptable collateral to mitigate the credit risk such as:

- *Cash (Deposits)*
- *Land and/or building*
- *Machinery and equipment*
- *Vehicle*
- *Trade receivables*
- *Inventory*
- *Personal/Corporate/Bank Guarantee*

iii. Maximum credit risk

For financial assets recognised on the statements of financial position, the maximum exposure to credit risk equals their carrying amount. For bank guarantees, the maximum exposure to credit risk is the maximum amount that the Bank has to pay if the obligations of the bank guarantees issued are called upon. For the unused loan facilities, the maximum exposure to credit risk is the committed amount.

47. MANAJEMEN RISIKO (lanjutan) / *47. RISK MANAGEMENT (continued)*

Risiko kredit (lanjutan) / ***Credit risk (continued)***

iii. Risiko kredit maksimum (lanjutan) / *iii. Maximum credit risk (continued)*

Eksposur maksimum risiko kredit terhadap aset keuangan pada laporan posisi keuangan pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The maximum exposure to credit risk of financial assets on statements of financial position as of December 31, 2025 and 2024 are as follows:

	Eksposur maksimum/ *Maximum exposure*		
	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Laporan posisi keuangan			*Statement of financial position*
Giro pada Bank Indonesia	1.238.091.018	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	317.275.973	114.518.280	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.405.100.000	12.200.000	*Placements with Bank Indonesia and other banks*
Efek-efek	10.075.611.567	7.463.989.140	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	-	197.775.620	*Securities purchased under resale agreement*
Pendapatan bunga yang masih akan diterima	333.747.595	320.839.465	*Interest income receivables*
Pinjaman yang diberikan	22.380.166.216	20.559.860.321	*Loans*
Penyertaan saham	-	219.933.809	*Investment in shares*
Tagihan akseptasi	21.291.371	17.791.739	*Acceptances receivable*
Aset lain-lain*)	21.602.904	21.740.496	*Other assets*)
Jumlah	**35.792.886.644**	**30.329.701.851**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(579.000.190)	(465.703.975)	*Allowance for impairment losses*
Jumlah - bersih	**35.213.886.454**	**29.863.997.876**	***Total - net***

*) Aset lain-lain terdiri atas uang jaminan, tagihan pihak ketiga, dan lain-lain

*) *Other assets consist of security deposits, receivables from third parties, and others*

Eksposur maksimum risiko kredit terhadap rekening administratif pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The maximum credit risk exposures relating to administrative accounts as of December 31, 2025 and 2024 are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Rekening administratif			***Administrative accounts***
Fasilitas pinjaman yang belum digunakan	6.822.633.454	4.661.563.665	*Unused loan facilities*
Letter of credit	11.624.507	169.275.405	*Letter of credit*
Garansi yang diterbitkan	179.024.353	522.142.989	*Guarantees issued*
Jumlah	**7.013.282.314**	**5.352.982.059**	***Total***
Dikurangi:			*Less:*
Cadangan kerugian penurunan nilai	(645.955)	(1.270.842)	*Allowance for impairment losses*
Jumlah - bersih	**7.012.636.359**	**5.351.711.217**	***Total - net***

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

iii. Risiko kredit maksimum (lanjutan)

Tabel di atas menggambarkan eksposur maksimum atas risiko kredit bagi Bank pada tanggal 31 Desember 2025 dan 2024, sebelum memperhitungkan cadangan kerugian penurunan nilai kredit dan agunan. Untuk aset keuangan, eksposur di atas ditentukan berdasarkan nilai tercatat bruto seperti yang diungkapkan pada laporan posisi keuangan.

Seperti yang telah dijelaskan di atas, pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar 62,53% dan 67,79% dari jumlah eksposur maksimum adalah berasal dari pinjaman yang diberikan (sebelum memperhitungkan cadangan kerugian penurunan nilai).

iv. Evaluasi penurunan nilai

Untuk tujuan akuntansi, Bank menggunakan model kerugian kredit ekspektasian untuk pengakuan kerugian penurunan nilai aset keuangan.

Pertimbangan utama evaluasi penurunan nilai pinjaman yang diberikan termasuk adanya pembayaran pokok atau bunga yang jatuh tempo lebih dari 30 (tiga puluh) hari dan 90 (sembilan puluh) hari atau terdapat kesulitan atau pelanggaran dari persyaratan yang terdapat dalam kontrak awal yang diketahui. Bank melakukan evaluasi penurunan nilai dalam 2 (dua) area yaitu evaluasi penurunan nilai secara individual dan evaluasi penurunan nilai secara kolektif.

a. Evaluasi penurunan nilai secara individual

Bank menentukan penyisihan kerugian penurunan nilai secara individual untuk masing-masing pinjaman signifikan yang diberikan dan memiliki bukti objektif penurunan nilai.

b. Evaluasi penurunan nilai secara kolektif

Evaluasi penyisihan kerugian penurunan nilai secara kolektif dilakukan atas pinjaman yang diberikan yang tidak signifikan secara individual dan juga untuk pinjaman signifikan yang diberikan yang tidak memiliki bukti objektif penurunan nilai.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

iii. Maximum credit risk (continued)

The table above shows the maximum exposure to credit risk for the Bank as of December 31, 2025 and 2024, gross of allowance for impairment losses and collateral. For financial assets, the exposures set out above are based on the gross carrying value as disclosed in the statements of financial position.

As mentioned above, as of December 31, 2025 and 2024, amounted to 62.53% and 67.79% of the total maximum exposure, respectively, is derived from loans (gross of allowance for impairment losses).

iv. Impairment assessment

For accounting purposes, the Bank uses an expected credit loss model for the recognition of losses on impaired financial assets.

The main considerations for the loan impairment assessment include whether any payments of principal or interest are overdue by more than 30 (thirty) days and 90 (ninety) days or there are any known difficulties, or infringement of the original terms of the contract. The Bank addresses impairment assessment in 2 (two) areas: individually assessed allowances and collectively assessed allowances.

a. Individually assessed allowances

The Bank determines the allowances for impairment losses for each significant loans on an individual basis and have objective evidence of impairment.

b. Collectively assessed allowances

Allowances for impairment losses are assessed collectively for losses on loans that are not individually significant and for individually significant loans with no objective evidence of impairment.

47. MANAJEMEN RISIKO (lanjutan)

47. RISK MANAGEMENT (continued)

Risiko kredit (lanjutan)

Credit risk (continued)

v. Kualitas aset keuangan

v. *Quality of financial assets*

Pada tanggal 31 Desember 2025 dan 2024, eksposur risiko kredit atas aset keuangan terbagi atas:

As of December 31, 2025 and 2024, credit risk exposure relating to financial assets are divided as follows:

	31 Desember/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Giro pada Bank Indonesia	1.238.091.018	-	-	1.238.091.018	*Current accounts with Bank Indonesia*
Giro pada bank lain	317.275.973	-	-	317.275.973	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.405.100.000	-	-	1.405.100.000	*Placements with Bank Indonesia and other banks*
Efek-efek	10.075.611.567	-	-	10.075.611.567	*Marketable securities*
Efek-efek yang dijual dengan janji dibeli kembali	-	-	-	-	*Securities sold under repurchase agreement*
Pinjaman yang diberikan	20.829.496.963	1.033.078.288	517.590.965	22.380.166.216	*Loans*
Pendapatan bunga yang masih akan diterima	267.398.577	66.349.018	-	333.747.595	*Interest income receivables*
Tagihan akseptasi	21.291.371	-	-	21.291.371	*Acceptances receivable*
Penyertaan saham	-	-	-	-	*Investment in shares*
Aset lain-lain	21.602.904	-	-	21.602.904	*Other assets*
Jumlah	**34.175.868.373**	**1.099.427.306**	**517.590.965**	**35.792.886.644**	***Total***
Dikurangi:					*Less:*
Cadangan kerugian penurunan nilai				(579.000.190)	*Allowance for impairment losses*
Jumlah - bersih				**35.213.886.454**	***Total - net***

	31 Desember/*December 31, 2024*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Giro pada Bank Indonesia	1.401.052.981	-	-	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.518.280	-	-	114.518.280	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	12.200.000	-	-	12.200.000	*Placements with Bank Indonesia and other banks*
Efek-efek	7.463.989.140	-	-	7.463.989.140	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	-	-	197.775.620	*Securities purchased under resale agreement*
Pinjaman yang diberikan	19.119.576.021	784.838.757	655.445.543	20.559.860.321	*Loans*
Pendapatan bunga yang masih akan diterima	264.098.649	54.995.381	1.745.435	320.839.465	*Interest income receivables*
Tagihan akseptasi	17.791.739	-	-	17.791.739	*Acceptances receivable*
Penyertaan saham	219.933.809	-	-	219.933.809	*Investment in shares*
Aset lain-lain	21.740.496	-	-	21.740.496	*Other assets*
Jumlah	**28.832.676.735**	**839.834.138**	**657.190.978**	**30.329.701.851**	***Total***
Dikurangi:					*Less:*
Cadangan kerugian penurunan nilai				(465.703.975)	*Allowance for impairment losses*
Jumlah - bersih				**29.863.997.876**	***Total - net***

Dalam menentukan kualitas kredit berdasarkan segmen klien dipantau dan dianalisis berdasarkan hari tunggakan (*days past due*) dan kriteria kualitatif sebagaimana dijelaskan pada Catatan 2g.

In determining credit quality by client segment are monitored and analised based on days past due and qualitative criteria as explained in Note 2g.

Dalam hal terdapat keraguan terhadap kemampuan debitur untuk melakukan pembayaran kontraktual pada saat jatuh tempo, persyaratan kredit dapat dinegosiasikan kembali berdasarkan kesepakatan antara Bank dan debitur.

Where there is doubt on the ability of the debtors to meet contractual payments when due, the terms of the loans might be renegotiated based on mutual agreement between the Bank and the debtors.

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Dampak langsung dan tidak langsung atas pandemi COVID-19 mempengaruhi perekonomian global, pasar, dan pihak lawan maupun debitur dari Bank. Manajemen telah melakukan langkah-langkah untuk memitigasi dampak terhadap bisnis Bank sebagai berikut:

- Mempersiapkan skema restrukturisasi/ relaksasi kredit sementara untuk debitur yang terdampak COVID-19.
- Melakukan penyaluran pinjaman yang diberikan secara selektif dengan menerapkan prinsip kehati-hatian.
- Meningkatkan upaya penagihan dan penyelesaian kredit bermasalah.
- Melakukan efisiensi biaya operasional.
- Menerapkan manajemen risiko likuiditas secara optimum untuk menjaga posisi likuiditas Bank.

Manajemen juga melakukan analisa berdasarkan risiko atas sektor-sektor yang paling terkena dampak penurunan akibat COVID-19, dan melakukan *review* kualitatif atas perhitungan ECL terhadap sektor-sektor tersebut untuk meyakinkan bahwa ECL mencukupi.

Untuk debitur yang masih memiliki prospek usaha serta kemampuan membayar kewajiban, Bank dapat memberikan relaksasi kredit antara lain dalam bentuk perpanjangan tenor disesuaikan dengan siklus usaha debitur saat ini (pada umumnya untuk masa hingga 1 tahun). Sementara untuk debitur yang membutuhkan waktu pemulihan relatif lebih lama, dapat diberikan restrukturisasi kredit, antara lain dalam bentuk pemberian masa tenggang/penundaan pembayaran dan/atau penurunan suku bunga.

Sampai dengan tanggal 31 Desember 2025 dan 2024, terdapat 148 dan 186 debitur dengan total pinjaman sebesar Rp1.874.533.252 dan Rp2.206.449.707 yang telah direstrukturisasi.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Direct and indirect effects of the COVID-19 outbreak are impacting the global economy, markets, and the counterparties and debtor of the Bank. Management has taking actions to mitigate the impacts on the Bank's business as follows:

- *Establish various temporary credit restructuring/relaxation scheme for customers affected by COVID-19.*
- *Provide loans to customers selectively with prudent principles.*
- *Increase efforts on collections and settlements of non-performing loans.*
- *Manage operational expenses efficiently.*
- *Implement liquidity risk management optimally to secure the Bank's liquidity position.*

Management also performs a risk-based assessment of those sectors most impacted by the COVID-19 downturn, and performs a qualitative review of the ECL calculation associated with those sectors to ensure that overall ECL is sufficient.

For debtors who still have good business prospects and the ability to pay, the Bank can provide loan relaxation, among others through tenor extension in accordance with the debtor's current business cycle (generally for period up to 1 year). Meanwhile, for debtors who need relatively longer recovery time, its can be given loan restructuring, among others in the form of grace period/payment holiday and/or a reduction in interest rates.

As of December 31, 2025 and 2024, there are 148 and 186 debtors with total outstanding loans of Rp1,874,533,252 and Rp2,206,449,707 respectively which have been restructured.

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Manajemen telah berupaya untuk memperbaiki kualitas kredit Bank dan menjaga rasio NPL dibawah ketentuan maksimal yang dipersyaratkan oleh OJK dengan melakukan hal-hal sebagai berikut:

- Melakukan *cessie* pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah;
- Mentransfer pinjaman untuk debitur yang masuk ke dalam kategori pinjaman yang bermasalah menjadi Aset Yang Diambil Alih ("AYDA") dengan mengambil alih agunan yang dijaminkan oleh debitur;
- Membuat pembentukan cadangan kerugian penurunan nilai tambahan untuk pinjaman; dan
- Melakukan restrukturisasi pinjaman sesuai dengan ketentuan dari OJK.

Mengingat model perhitungan kerugian kredit ekspektasian tidak sepenuhnya dapat menghasilkan estimasi kerugian yang akurat dalam kondisi ekonomi yang abnormal, maka Manajemen juga sudah memperhitungkan beberapa faktor penyesuaian untuk memastikan nilai kerugian kredit ekspektasian yang diakui dalam laporan keuangan dinyatakan secara wajar. Dalam menilai kondisi masa depan, manajemen telah mempertimbangkan berbagai informasi relevan yang tersedia, termasuk kebijakan COVID-19 yang dikeluarkan oleh pemerintah untuk mendukung dan mengurangi dampak penyebaran COVID-19 terhadap perekonomian, dan mendorong Bank untuk menunda atau merestrukturisasi pinjaman.

Dalam kondisi normal, penjadwalan ulang atau restrukturisasi pinjaman akan menunjukkan peningkatan risiko kredit yang signifikan dan pindah ke *Stage 2*. Namun, dalam kondisi saat ini, manajemen telah mempertimbangkan bahwa restrukturisasi atau peristiwa tidak secara otomatis memicu peningkatan risiko kredit yang signifikan jika debitur diharapkan untuk memulihkan dan memenuhi kewajiban kontraktual mereka setelah akhir periode restrukturisasi atau relaksasi.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Management has made efforts to improve the quality of the Bank's credit and maintain the NPL ratio below the maximum stipulated by the OJK by doing the following:

- *Conduct a loan cessie for debtors who fall into the non-performing loan category;*
- *Transferring loans for debtors that are categorised as non-performing loans into Foreclosed Assets ("AYDA") by taking over the collateral guaranteed by the debtor;*
- *Create an additional allowance for impairment losses for loans; and*
- *Performed loan restructuring in accordance with the provisions of the OJK.*

Considering that the expected credit loss calculation model cannot produce an accurate estimation of losses in abnormal economic conditions, Management has also taken into account several adjustment factors to ensure the expected value of the expected credit loss recognised in the financial statements is stated fairly. In assessing future conditions, management has considered various relevant information available, including COVID-19 policies issued by the government to support and mitigate the impact of the spread of COVID-19 on the economy, and encouragement for banks to defer or restructure loans.

Under normal conditions, a rescheduling or restructuring of a loan would indicate a significant increase in credit risk and a move to Stage 2. However, in the current condition, management has considered that such a restructuring or event was not automatically trigger a significant increase in credit risk if the debtor would be expected to recover and fulfill their contractual obligations after the end of the restructuring or relaxation period.

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian

Lifetime

Kerugian kredit ekspektasian diestimasikan berdasarkan periode dimana Bank terpapar pada risiko kredit. Bank memiliki proses *review* dari setiap model bisnis/produknya. Baik kredit *revolving* maupun *non-revolving*, untuk menghitung kerugian kredit ekspektasian menggunakan jangka waktu kontraktual sesuai dengan jangka waktu kontraknya. Penetapan periode tersebut khususnya untuk kredit *revolving* dilakukan dengan mempertimbangkan kondisi dimana proses perpanjangan kredit *revolving* yang diberikan oleh Bank dilakukan melalui kajian yang komprehensif yaitu melalui evaluasi yang substantif dibandingkan administratif.

Lingkungan ekonomi yang berkembang adalah penentu utama dari kemampuan nasabah Bank untuk memenuhi kewajiban mereka saat jatuh tempo. Ini adalah prinsip dasar PSAK 109 bahwa potensi kerugian kredit di masa depan harus bergantung tidak hanya pada kesehatan ekonomi saat ini, tetapi juga harus memperhitungkan kemungkinan perubahan pada lingkungan ekonomi. Misalnya, jika Bank mengantisipasi perlambatan tajam dalam ekonomi dunia, Bank harus membentuk lebih banyak cadangan hari ini untuk menyerap kerugian kredit yang kemungkinan akan terjadi dalam waktu dekat.

Untuk menangkap efek perubahan pada lingkungan ekonomi, model *Probability of Default* (PD) digunakan untuk menghitung kerugian kredit ekspektasian, dengan memasukkan informasi *forward looking* dalam bentuk perkiraan nilai-nilai variabel ekonomi yang kemungkinan akan berdampak pada kemampuan pembayaran kembali nasabah Bank.

Berbagai *Macro Economic Outlook* (MEV) digunakan untuk setiap model PD, tergantung pada hasil analisis statistik kesesuaian MEV dengan PD serta konsensus dari pakar kredit. Diantaranya adalah indeks barang konsumtif, inflasi, dan *Gross Domestic Product* (GDP) Nasional.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Key assumptions and judgments in determining expected credit loss

Lifetime

Expected credit loss is estimated based on the period over which the Bank is exposed to credit risk. The Bank has a review process for each of its business models/products. Both revolving and non-revolving loans, to calculate expected credit losses using the contractual term in accordance with the contract period. Determination of this period, especially for revolving credit, is carried out by taking into account the conditions in which the Bank carries out the process of extending revolving credit through a robust study, namely through a substantive compared to administrative evaluation.

The developing economic environment is the key determinant of the ability of a Bank's customer to meet their obligations as they fall due. It is a fundamental principle of SFAS 109 that the potential future credit losses should depend not just on the health of the economy today, but should also take into account potential changes to the economic environment. For example, if the Bank was to anticipate a sharp slowdown in the world economy, Bank should make more provisions today to absorb the credit losses likely to occur in the near future.

To capture the effect of changes to the economic environment, Probability of Default (PD) model is used to calculate expected credit loss, by incorporating forward-looking information in the form of forecasts of the values of economic variables that are likely to have an effect on the repayment ability of the Bank's customer.

Various of Macro Economic Outlook (MEV) are used for each PD model, depending on the statistical analysis result of appropriateness of the MEV with PD as well as consensus from credit expert. Amongst others are consumer goods index, inflation and National Gross Domestic Product (GDP).

47. MANAJEMEN RISIKO (lanjutan)

Risiko kredit (lanjutan)

v. Kualitas aset keuangan (lanjutan)

Asumsi dan pertimbangan utama dalam menentukan kerugian kredit ekspektasian (lanjutan)

Sensitivitas MEV terhadap ECL

Perhitungan ECL bergantung pada beberapa variabel dan pada dasarnya tidak linier dan tergantung pada portofolio, yang menyiratkan bahwa tidak ada analisis tunggal yang dapat sepenuhnya menunjukkan sensitivitas kerugian kredit ekspektasian terhadap perubahan dalam MEV. Bank berkeyakinan bahwa sensitivitas harus dilakukan terhadap seluruh variabel, alih-alih variabel tunggal, karena hal ini sejalan dengan sifat multi-variabel dari perhitungan ECL.

Analisis sensitivitas ECL dilakukan untuk mengeksplorasi efek dari pandemi global COVID-19 yang menyebabkan perlambatan ekonomi Indonesia.

Risiko pasar

Risiko pasar adalah risiko pada laporan posisi keuangan dan rekening administratif termasuk transaksi derivatif, akibat perubahan secara keseluruhan dari kondisi pasar, termasuk risiko perubahan harga opsi. Risiko pasar meliputi, antara lain, risiko tingkat suku bunga, risiko nilai tukar, risiko ekuitas dan risiko komoditas. Risiko tingkat suku bunga, risiko nilai tukar dan risiko komoditas dapat berasal baik dari posisi *trading book* maupun posisi *banking book*, sedangkan risiko ekuitas berasal dari posisi *trading book*. *Assets & Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko pasar.

Risiko pasar melekat pada aktivitas fungsional Bank seperti kegiatan *treasury* dan investasi dalam bentuk efek-efek dan pasar uang maupun penyertaan pada lembaga keuangan lainnya, penyediaan dana dan pinjaman, kegiatan pendanaan dan penerbitan surat utang, serta kegiatan pembiayaan perdagangan. Untuk itu, Bank harus dan selalu melakukan identifikasi dan pemantauan dari waktu ke waktu untuk mengantisipasi adanya risiko pasar.

47. RISK MANAGEMENT (continued)

Credit risk (continued)

v. Quality of financial assets (continued)

Key assumptions and judgments in determining expected credit loss (continued)

Sensitivity of MEV to ECL

The ECL calculation relies on multiple variables and is inherently non-linear and portfolio-dependent, which implies that no single analysis can fully demonstrate the sensitivity of the expected credit loss to changes in the MEVs. The Bank believes that sensitivity should be performed to all variables, instead of single variable, as this aligns with the multi-variable nature of the ECL calculation.

A sensitivity analysis of ECL was undertaken to explore the effect of the global COVID-19 pandemic that leads to Indonesia economy slowdown.

Market risk

Market risk is the risk on the statements of financial position and administrative accounts, including derivative transactions, due to overall changes in market conditions, including the risk of change of option price. Market risk include, among others, interest rate risk, foreign exchange risk, equity risk and commodity risk. Interest rate risk, foreign exchange risk and commodity risk can come from trading book and banking book, whereas equity risk come from trading book. Assets & Liabilities Committee (ALCO) is a committee assisting Directors in monitoring and maintaining market risk.

Market risk is adhered on functional activities of the Bank such as treasury activity and investment in securities and money market or investment in other financing institution, funding and lending, funding activity and issued obligation and financing trading activity. The Bank must and always identify and monitor from time to time to anticipate the market risk.

47. MANAJEMEN RISIKO (lanjutan)

Risiko pasar (lanjutan)

Tujuan dari manajemen risiko pasar adalah untuk melakukan identifikasi, pengukuran, pengendalian, dan pengelolaan eksposur risiko pasar dalam parameter yang dapat diterima, serta memaksimalkan tingkat pengembalian. Hal ini dilakukan melalui kebijakan yang komprehensif dan kerangka limit untuk mengidentifikasi, mengukur, dan memantau nilai risiko berdasarkan tingkat risiko yang akan diambil (*risk appetite*) oleh Bank.

Dalam melakukan pengukuran risiko pasar, Bank menggunakan perhitungan Metode Standar untuk menghitung Kewajiban Penyediaan Modal Minimum (KPMM) untuk risiko pasar.

Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan mempengaruhi arus kas masa depan dari nilai wajar instrumen keuangan.

Dalam rangka meminimalkan risiko tingkat suku bunga, Bank melakukan upaya-upaya sebagai berikut, antara lain:

- Meningkatkan fungsi dan peran *Assets & Liabilities Committee* (ALCO) dalam rangka identifikasi dan penetapan tingkat suku bunga pinjaman dan dana pihak ketiga untuk mengantisipasi fluktuasi suku bunga pasar.

- Penerapan Kebijakan *Assets & Liabilities Management* (ALMA) untuk pihak berelasi dalam penerapan manajemen risiko Bank dan merupakan salah satu pedoman bagi unit kerja *Treasury* dalam melakukan transaksi di pasar uang dan pasar modal seperti:

  i. Melakukan identifikasi risiko tingkat suku bunga yang berasal dari transaksi dan portofolio Bank pada Efek-efek;

  ii. Penetapan sistem pengukuran risiko tingkat suku bunga dengan menggunakan *gap analysis* atau *duration analysis*; dan

  iii. Strategi penanaman dana dan strategi pengumpulan dana.

47. RISK MANAGEMENT (continued)

Market risk (continued)

The objective of market risk management is to identify, measure, control, and manage market risk exposures within acceptable parameters, while optimising the returns. This is done through a comprehensive policy and limit framework to indentify, measure, and monitor the amount of risk based on risk appetite of the Bank.

In measuring market risk, the Bank uses the Standardised Method in calculating Capital Adequacy Ratio (CAR) for market risk.

Interest rate risk

Interest rate risk arise from the possibility that changes in interest rates will affect future cash flows or the fair values of financial instruments.

To minimise interest rate risk, the Bank makes the following efforts, among others:

- *Increasing function and role of Assets & Liabilities Committee (ALCO) in identifying and determining interest rate and third party funds to anticipate fluctuations in market interest rate.*

- *Application of Assets & Liabilities Management's (ALMA) policy to related parties in application of risk management of the Bank and it is one of a guidance for Treasury working unit in money market and capital market transactions such as:*

  i. Identifying interest rate risk from transaction and Bank's portfolio of securities;

  ii. Determining measuring system of interest rate risk using gap analysis or duration analysis; and

  iii. Strategies of investment and collection of funds.

47. MANAJEMEN RISIKO (lanjutan) / *47. RISK MANAGEMENT (continued)*

Risiko pasar (lanjutan) / ***Market risk (continued)***

Risiko tingkat suku bunga (lanjutan) / *Interest rate risk (continued)*

Tabel berikut merupakan kisaran tingkat suku bunga kontraktual per tahun untuk aset dan liabilitas keuangan yang signifikan untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024:

The following table summarises the range of contractual interest rates per annum for significant financial assets and liabilities for the year ended December 31, 2025 and 2024:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Aset			***Assets***
Giro pada bank lain	0,00% - 2,00%	0,00% - 2,00%	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	4,75% - 5,20%	5,60% - 6,75%	*Placements with Bank Indonesia and other banks*
Efek-efek	4,75% - 10,75%	2,35% - 11,00%	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	-	6,55% - 6,65%	*Securities purchased under resale agreements*
Pinjaman yang diberikan	0,55% - 17,25%	1,00% - 18,00%	*Loans*
Liabilitas			***Liabilities***
Simpanan nasabah	0,00% - 7,50%	0,00% - 8,00%	*Deposits from customers*
Simpanan dari bank lain	0,50% - 6,50%	0,00% - 7,00%	*Deposits from other banks*
Efek-efek yang diterbitkan	8,25% - 11,75%	9,25% - 11,75%	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	4,75% - 4,90%	6,55% - 6,65%	*Securities sold under repurchase agreements*

Sensitivitas terhadap laba bersih / *Sensitivity to net income*

Tabel di bawah ini mengikhtisarkan sensitivitas laba bersih Bank pada tanggal 31 Desember 2025 dan 2024 atas perubahan tingkat suku bunga (tidak diaudit):

The following table summarises the sensitivity of Bank's net income to movement of interest rates on December 31, 2025 and 2024 (unaudited):

	31 Desember/*December 31, 2025*		
	Peningkatan dalam 100 basis poin/ *Increase by 100 basis point*	**Penurunan dalam 100 basis poin/ *Decrease by 100 basis point***	
Pengaruh terhadap laba bersih	5.707.573	(5.707.573)	*Impact to net income*

	31 Desember/*December 31, 2024*		
	Peningkatan dalam 100 basis poin/ *Increase by 100 basis point*	**Penurunan dalam 100 basis poin/ *Decrease by 100 basis point***	
Pengaruh terhadap laba bersih	5.564.767	(5.564.767)	*Impact to net income*

47. MANAJEMEN RISIKO (lanjutan)

Risiko pasar (lanjutan)

Risiko tingkat suku bunga (lanjutan)

Proyeksi di atas mengasumsikan bahwa tingkat suku bunga bergerak pada jumlah yang sama, sehingga tidak mencerminkan pengaruh potensial laba atas perubahan beberapa tingkat suku bunga sementara yang lainnya tidak berubah. Proyeksi juga mengasumsikan bahwa seluruh variabel lainnya adalah konstan dan berdasarkan tanggal pelaporan yang konstan serta seluruh posisi hingga jatuh tempo.

Risiko likuiditas merupakan risiko akibat ketidakmampuan Bank memenuhi kewajiban yang jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan, tanpa mengganggu aktivitas dan kondisi keuangan Bank. Ketidakmampuan memperoleh sumber pendanaan arus kas sehingga menimbulkan risiko likuiditas dapat disebabkan antara lain oleh:

a. Ketidakmampuan menghasilkan arus kas yang berasal dari aset produktif maupun yang berasal dari penjualan aset termasuk aset likuid; dan/atau
b. Ketidakmampuan menghasilkan arus kas yang berasal dari penghimpunan dana dan transaksi antar Bank.

Risiko likuiditas berhubungan dengan adanya kemungkinan Bank tidak dapat memenuhi kewajibannya terhadap deposan, investor atau kreditur yang diantaranya disebabkan dari keterbatasan akses pendanaan atau ketidakmampuan Bank untuk melikuidasi aset yang dimiliki dengan harga yang wajar. *Assets and Liabilities Committee* (ALCO) merupakan komite yang membantu Direksi dalam mengawasi dan mengelola risiko likuiditas.

Secara umum, tujuan utama manajemen risiko untuk risiko likuiditas adalah untuk meminimalkan kemungkinan ketidakmampuan Bank dalam memperoleh sumber pendanaan arus kas. Dengan demikian Bank dapat memenuhi setiap kewajiban keuangan yang sudah diperjanjikan secara tepat waktu, dan agar senantiasa dapat memelihara tingkat likuiditas yang memadai dan optimal.

47. RISK MANAGEMENT (continued)

Market risk (continued)

Interest rate risk (continued)

The projection above assumes that interest rates of all maturities move by the same amount and, therefore, do not reflect the profit potential impact on the changes of some interest rates while others remain unchanged. The projections also assume that all other variables are held constant and based on a constant reporting date position and that all positions run to maturity.

Liquidity risk is the risk arising from the inability of the Bank to meet the maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be pledged, without disturbing the activities and financial condition of the Bank. The inability to obtain funding for cash flows resulting to liquidity risk can be contributed by:

a. Inability to generate cash flows from productive assets as well as from the sale of assets, including liquid assets; and/or
b. Inability to generate cash flows from funding and interbank transactions.

Liquidity risk related with the possibility of Bank's inability to meet the maturing obligations to its customers, investors or creditors in which due to the limitation of funding line or inability of the Bank to liquidate its assets with the fair value. Assets and Liabilities Committee (ALCO) is a commitee under Director who monitor and manage liquidity risk.

In general, the main purpose of liquidity risk management is to minimise the possibility of the Bank's inability to obtain sources of financing. Thus the Bank can fulfill any financial obligations as they fall due in a timely manner, and in order to maintain an adequate and optimal level of liquidity.

47. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas

Kebijakan pengelolaan risiko likuiditas antara lain mencakup pengawasan aktif Dewan Komisaris dan Direksi, yang pada intinya mengatur penerapan Manajemen Risiko likuiditas pada Bank, Kebijakan Manajemen Risiko likuiditas yang secara umum mencakup strategi manajemen risiko likuiditas, tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) dan Sistem Informasi Manajemen Risiko serta Sistem Pengendalian Internal dengan menerapkan pengendalian internal dan kaji ulang independen yang memadai terhadap penerapan Manajemen Risiko untuk Risiko likuiditas yang dilaksanakan oleh Satuan Kerja Audit Internal (SKAI) dan Satuan Kerja Manajemen Risiko (SKMR).

Tujuan dari manajemen risiko likuiditas adalah untuk memastikan bahwa setiap kebutuhan dana di saat ini maupun di masa datang baik untuk kondisi normal maupun kondisi stres dapat dipenuhi.

Bank mengelola risiko likuiditas melalui analisis perbedaan jatuh tempo likuiditas dan rasio-rasio likuiditas. Risiko likuiditas diukur dan dipantau secara harian berdasarkan kerangka kerja limit risiko likuiditas. Analisis kesenjangan likuiditas memberikan pandangan terhadap ketidaksesuaian arus kas masuk dengan arus kas keluar pada waktu tertentu. Kondisi ini dikelola secara terpusat oleh *Treasury* yang mempunyai akses dan otorisasi secara langsung ke *interbank*, *wholesale* dan *professional market* lainnya, dalam upaya membantu aktivitas utama bisnis Bank seperti pengumpulan dana dan pemberian pinjaman.

Langkah yang diambil oleh Bank sehubungan dengan perbedaan antara aset dan liabilitas keuangan yang jatuh tempo antara 1 (satu) sampai dengan 3 (tiga) bulan, adalah meningkatkan pelayanan kepada nasabah simpanan, memantau perpanjangan simpanan, mencari nasabah baru serta menawarkan produk dan bunga yang menarik kepada nasabah untuk menjaga stabilitas dan kontinuitas jumlah simpanan dari nasabah. Di samping itu, Bank juga mengintensifkan usaha penagihan kepada debitur bermasalah dan menempatkan kelebihan dana pada efek-efek yang memiliki pasar sehingga dapat dicairkan setiap saat apabila Bank membutuhkan dana.

47. RISK MANAGEMENT (continued)

Liquidity risk

Liquidity risk management policies include the active supervision of the Board of Commissioners and Board of Directors, which basically set the implementation of the Bank's Liquidity Risk Management, Liquidity Risk Management Policy which generally include liquidity risk management strategy, the level of risk to be taken (risk appetite) and risk tolerance (risk tolerance) and Information Systems Risk Management and Internal Control System by implementing internal control and review of appropriate independent of the implementation of Risk Management for liquidity risk is carried out by the Internal Audit (SKAI) and Risk Management Unit (SKMR).

The objective of liquidity risk management is to ensure that current and future fund requirements can be met both in normal or stress condition.

The Bank manages liquidity risk through liquidity gap analysis and liquidity ratios. Liquidity risk is measured and monitored on a daily basis based on liquidity risk limit framework. Liquidity gap analysis provides insight as to the mismatch of expected cash inflows against cash outflows on any given day. This is centrally managed within Treasury which has direct and authorised access to interbank, wholesale and other professional markets, to supplement core Bank activities such as deposit taking and lending.

The steps taken by the Bank in connection with the maturity gap mismatch between its financial assets and liabilities due in 1 (one) to 3 (three) months such as improving its services to customers, monitor the extension of deposit, search for new customers and offering services including attractive products and interest rates in order to maintain stability and continuity of deposits from customers. In addition, the Bank also intensify collection efforts from non-performing debtors and placing excess funds on marketable securities so they can be withdrawn at any time as the Bank needs a fund.

47. MANAJEMEN RISIKO (lanjutan) / 47. *RISK MANAGEMENT (continued)*

Risiko likuiditas (lanjutan) / *Liquidity risk (continued)*

Tabel jatuh tempo berikut ini menyajikan informasi mengenai perkiraan jatuh tempo dari liabilitas sesuai arus kas kontraktual yang tidak didiskontokan tanggal 31 Desember 2025 dan 2024:

The maturity tables below provide information about maturities on contractual undiscounted cash flows of liabilities on December 31, 2025 and 2024:

	31 Desember/ *December 31, 2025*							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	≤ 1 bulan/ *≤ 1 month*	> 1 bulan-3 bulan/ *> 1 month 3 months*	> 3 bulan-1 tahun/ *> 3 months 1 year*	> 1 - 5 tahun/ *> 1 - 5 years*	Lebih dari 5 tahun/ *More than 5 years*	
Liabilitas								***Liabilities***
Simpanan nasabah	24.507.044.106	7.126.297.039	7.895.212.828	6.256.134.260	3.229.399.979	-	-	*Deposits from customers*
Simpanan dari bank lain	2.582.136.960	791.470.609	1.775.827.281	5.547.306	7.206.500	2.085.264	-	*Deposits from other banks*
Efek-efek yang diterbitkan	4.920.218.750	-	-	306.937.500	431.562.500	4.181.718.750	-	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	694.526.442	-	694.526.442	-	-	-	-	*Securities sold under repurchase agreement*
Liabilitas akseptasi	21.291.371	-	-	13.433.964	7.857.407	-	-	*Acceptances payable*
Beban bunga yang masih harus dibayar	115.867.203	-	115.867.203	-	-	-	-	*Accrued expenses*
Liabilitas lain-lain	95.740.081	-	56.203.203	-	10.848.865	28.688.013	-	*Other liabilities*
	32.936.824.913	**7.917.767.648**	**10.537.636.957**	**6.582.053.030**	**3.686.875.251**	**4.212.492.027**	**-**	

	31 Desember/ *December 31, 2024*							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	≤ 1 bulan/ *≤ 1 month*	> 1 bulan-3 bulan/ *> 1 month 3 months*	> 3 bulan-1 tahun/ *> 3 months 1 year*	> 1 - 5 tahun/ *> 1 - 5 years*	Lebih dari 5 tahun/ *More than 5 years*	
Liabilitas								***Liabilities***
Simpanan nasabah	23.468.794.821	6.108.873.248	8.924.408.989	5.045.857.702	3.349.654.882	40.000.000	-	*Deposits from customers*
Simpanan dari bank lain	688.839.554	259.466.889	383.361.716	28.828.095	8.223.514	8.959.340	-	*Deposits from other banks*
Efek-efek yang diterbitkan	2.911.187.503	-	-	-	369.250.000	2.541.937.503	-	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	590.631.264	492.189.611	98.441.653	-	-	-	-	*Securities sold under repurchase agreement*
Liabilitas akseptasi	17.005.026	-	-	2.294.831	14.710.195	-	-	*Acceptances payable*
Beban bunga yang masih harus dibayar	103.156.225	-	103.156.225	-	-	-	-	*Accrued expenses*
Liabilitas lain-lain	84.125.294	-	32.791.084	-	11.522.906	39.811.304	-	*Other liabilities*
	27.863.739.687	**6.860.529.748**	**9.542.159.667**	**5.076.980.628**	**3.753.361.497**	**2.630.708.147**	**-**	

Tabel berikut ini menyajikan informasi mengenai perkiraan *cash outflow* dari rekening administratif pada tanggal 31 Desember 2025 dan 2024:

The tables below provide information about estimated cash outflow of off-balance sheet as of December 31, 2025 and 2024:

	31 Desember/ *December 31, 2025*							
	Jumlah/ *Total*	Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand*	Kurang dari/ *Less than* 1 bulan/*month*	1 – 3 bulan/ *months*	3 – 12 bulan/ *months*	1 – 5 tahun/ *years*	Lebih dari 5 tahun/ *More than 5 years*	
Fasilitas pinjaman yang belum digunakan	6.822.633.455	-	643.571.267	944.288.285	4.052.084.578	803.006.859	379.682.466	*Unused loan facilities*
Letter of credit	11.624.507	-	-	1.105.222	10.519.285	-	-	*Letter of credit*
Garansi yang diterbitkan	179.024.353	-	-	11.153.576	40.664.578	127.206.200	-	*Guarantees issued*
Jumlah	**7.013.282.315**	**-**	**643.571.267**	**956.547.082**	**4.103.268.441**	**930.213.059**	**379.682.466**	***Total***

47. MANAJEMEN RISIKO (lanjutan)

Risiko likuiditas (lanjutan)

Tabel berikut ini menyajikan informasi mengenai perkiraan *cash outflow* dari rekening administratif pada tanggal 31 Desember 2025 dan 2024: (lanjutan)

47. RISK MANAGEMENT (continued)

Liquidity risk (continued)

The tables below provide information about estimated cash outflow of off-balance sheet as of December 31, 2025 and 2024: (continued)

	31 Desember/ *December 31, 2024*							
	Jumlah/ *Total*	**Tidak mempunyai kontrak jatuh tempo/ Dibayarkan sesuai permintaan/ *No contractual maturity/ Repayable on demand***	**Kurang dari/ *Less than* 1 bulan/*month***	**1 – 3 bulan/ *months***	**3 – 12 bulan/ *months***	**1 – 5 tahun/ *years***	**Lebih dari 5 tahun/ *More than 5 years***	
Fasilitas pinjaman yang belum digunakan	4.661.563.665	-	556.842.142	443.155.032	2.804.239.680	707.264.178	150.062.633	*Unused loan facilities*
Letter of credit	169.275.405	-	4.522.695	161.189.201	1.040.130	2.523.379	-	*Letter of credit*
Garansi yang diterbitkan	522.142.989	-	99.175.000	189.020	40.364.621	107.548.268	274.866.080	*Guarantees issued*
Jumlah	**5.352.982.059**	**-**	**660.539.837**	**604.533.253**	**2.845.644.431**	**817.335.825**	**424.928.713**	***Total***

48. NILAI WAJAR INSTRUMEN KEUANGAN

Aset dan liabilitas keuangan yang diukur pada nilai wajar menggunakan hierarki nilai wajar sebagai berikut:

i. Tingkat 1: input yang berasal dari harga kuotasian (tanpa penyesuaian) di pasar aktif untuk instrumen yang identik yang dapat diakses Bank pada tanggal pengukuran.

ii. Tingkat 2: input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi, baik secara langsung atau tidak langsung. Dalam kategori ini termasuk instrumen yang dinilai dengan menggunakan: harga kuotasian untuk instrumen yang serupa di pasar aktif; harga kuotasian untuk instrumen yang identik atau yang serupa di pasar yang tidak aktif; atau teknik penilaian lainnya dimana seluruh input signifikan dapat diobservasi secara langsung maupun tidak langsung dari data pasar.

iii. Tingkat 3: input yang tidak dapat diobservasi. Dalam kategori ini termasuk semua instrumen dimana teknik penilaian menggunakan input yang tidak dapat diobservasi dan input yang tidak dapat diobservasi ini memberikan dampak signifikan terhadap penilaian instrumen. Termasuk dalam kategori ini adalah instrumen yang dinilai berdasarkan harga kuotasian untuk instrumen serupa yang memerlukan penyesuaian atau asumsi signifikan yang tidak dapat diobservasi untuk mencerminkan perbedaan diantara instrumen tersebut.

48. FAIR VALUE OF FINANCIAL INSTRUMENTS

The financial assets and liabilities measured at fair value use the following fair value hierarchy:

i. Level 1: inputs that are quoted prices (unadjusted) in active markets for identical instruments that the Bank can access at the measurement date.

ii. Level 2: inputs other than quoted prices included within level 1 that are observable either directly or indirectly. This category includes instruments valued using: quoted market prices in active markets for similar instruments; quoted market prices in active markets for similar instruments; quoted prices for identical or similar instruments in markets that are not active; or other valuation techniques in which all significant inputs are directly or indirectly observable from market data.

iii. Level 3: inputs that are unobservable. This category includes all instruments for which the valuation technique includes inputs not based on observable data and the unobservable inputs have a significant effect on the instrument's valuation. This category includes instruments that are valued based on quoted prices for similar instruments for which significant unobservable adjustments or assumptions are required to reflect differences between the instruments.

48. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan) / *48. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)*

Tabel berikut menyajikan instrumen keuangan Bank yang diukur sebesar nilai wajar:

The following table presents the Bank's financial instruments that are measured at fair value:

	31 Desember/ *December 31, 2025*				
	Tingkat 1/ *Level 1*	Tingkat 2/ *Level 2*	Tingkat 3/ *Level 3*	Jumlah/ *Total*	
Aset keuangan					***Financial assets***
Efek-efek	2.810.307.397	2.164.881.168	-	4.975.188.565	*Marketable securities*
Penyertaan saham	-	-	0*)	0*)	*Investment in shares*
Jumlah	**2.810.307.397**	**2.164.881.168**	**-**	**4.975.188.565**	***Total***

	31 Desember/ *December 31, 2024*				
	Tingkat 1/ *Level 1*	Tingkat 2/ *Level 2*	Tingkat 3/ *Level 3*	Jumlah/ *Total*	
Aset keuangan					***Financial assets***
Efek-efek	1.961.146.285	836.818.168	-	2.797.964.453	*Marketable securities*
Penyertaan saham	-	-	0*)	0*)	*Investment in shares*
Jumlah	**1.961.146.285**	**836.818.168**	**-**	**2.797.964.453**	***Total***

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

**) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)*

Tidak terdapat perpindahan antara tingkat 1 dan tingkat 2 hierarki nilai wajar.

There is no transfer between level 1 and level 2 of fair value hierarchy.

Tabel berikut ini menyajikan perubahan pada instrumen keuangan Bank yang diukur dengan tingkat 3 - hierarki nilai wajar untuk tahun yang berakhir pada 31 Desember 2025 dan 2024.

The following table presents the changes in Bank's financial instruments measured at level 3 - fair value hierarchy for the year ended December 31, 2025 and 2024.

	31 Desember/*December 31, 2025*				
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Kerugian yang diakui pada laba rugi/ *Loss recognised in profit or loss*	Jumlah/ *Total*	
Aset keuangan					***Financial assets***
Penyertaan saham	0*)	-	-	0*)	*Investment in shares*

	31 Desember/*December 31, 2024*				
	Saldo awal/ *Beginning balance*	Penambahan/ *Additions*	Kerugian yang diakui pada laba rugi/ *Loss recognised in profit or loss*	Jumlah/ *Total*	
Aset keuangan					***Financial assets***
Penyertaan saham	0*)	-	-	0*)	*Investment in shares*

*) nilai wajar saham PT Bima Multi Finance adalah sebesar Rp1 (dalam nilai penuh)

**) fair value of shares in PT Bima Multi Finance are Rp1 (in full amount)*

48. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Pada tanggal 31 Maret 2025, Bank melakukan penilaian kembali atas nilai pasar 100% Ekuitas PT Bima Multi Finance. Berdasarkan laporan dari penilai Independen KJPP Tri, Santi dan Rekan yang ditandatangani oleh Santi Dewiyani, MAPPI (Cert.) pada tanggal 8 Desember 2023. Nilai wajar dari penyertaan saham sementara ditentukan menggunakan laporan keuangan per 30 September 2023 dengan pendekatan aset metode *Adjusted Book Value* (ABV) dan asumsi tingkat diskon likuiditas pasar sebesar 30%.

Tabel di bawah ini menyajikan perbandingan antara nilai tercatat dan nilai wajar dari aset dan liabilitas keuangan yang tidak diukur pada nilai wajar. Nilai wajar yang diungkapkan adalah berdasarkan informasi relevan yang tersedia pada tanggal 31 Desember 2025 dan 2024, dan tidak diperbaharui untuk mencerminkan perubahan dalam kondisi pasar yang telah terjadi setelah tanggal ini.

48. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

As of March 31, 2025, the Bank reassessed the market value of 100% Equity of PT Bima Multi Finance. Based on Independent Appraisal report from the independent appraiser KJPP Tri, Santi and Partners signed by Santi Dewiyani, MAPPI (Cert.) on December 8, 2023. The fair value of the temporary share investment was determined using the financial statements as of September 30, 2023 with an asset approach using the Adjusted Book Value (ABV) method and assumption the discount for lack of marketability of 30%.

The table below summarises the comparison between the carrying amounts and fair values of all financial assets and liabilities except those measured at fair value. The fair values disclosed are based on relevant information available as of December 31, 2025 and 2024, and are not updated to reflect changes in market conditions which have occurred after these dates.

	31 Desember/*December 31, 2025*		
	Nilai tercatat/ *Carrying value*	**Nilai wajar/ *Fair value***	
Aset Keuangan			***Financial Assets***
Kas	46.336.157	46.336.157	*Cash*
Giro pada Bank Indonesia	1.238.091.018	1.238.091.018	*Current accounts with Bank Indonesia*
Giro pada bank lain	317.270.028	317.270.028	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - bersih	1.405.032.387	1.405.032.387	*Placements with Bank Indonesia and other banks - net*
Efek-efek - bersih	5.099.269.911	5.217.819.504	*Marketable securities - net*
Pendapatan bunga yang masih akan diterima	325.114.214	325.114.214	*Interest income receivables*
Pinjaman yang diberikan - bersih	21.821.519.738	21.608.949.099	*Loans - net*
Tagihan akseptasi	21.291.371	21.291.371	*Acceptances receivable*
Aset lain-lain	21.602.904	21.602.904	*Other assets*
Jumlah aset keuangan	**30.295.527.728**	**30.201.506.682**	***Total financial assets***
Liabilitas Keuangan			***Financial Liabilities***
Simpanan nasabah	24.294.698.104	24.294.698.104	*Deposits from customers*
Simpanan dari bank lain	2.580.560.150	2.580.560.150	*Deposits from other banks*
Efek-efek yang diterbitkan	3.922.381.139	4.014.507.630	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	693.569.220	693.569.220	*Securities sold under repurchase agreement*
Liabilitas akseptasi	21.291.371	21.291.371	*Acceptances payable*
Beban yang masih harus dibayar	115.867.203	115.867.203	*Accrued expenses*
Liabilitas lain-lain	79.167.102	79.167.102	*Other liabilities*
Jumlah liabilitas keuangan	**31.707.534.289**	**31.799.660.780**	***Total financial liabilities***

48. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

48. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

	31 Desember/*December 31, 2024*		
	Nilai tercatat/ *Carrying value*	Nilai wajar/ *Fair value*	
Aset Keuangan			***Financial Assets***
Kas	71.600.262	71.600.262	*Cash*
Giro pada Bank Indonesia	1.401.052.981	1.401.052.981	*Current accounts with Bank Indonesia*
Giro pada bank lain	114.473.297	114.473.297	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain - bersih	12.197.255	12.197.255	*Placements with Bank Indonesia and other banks - net*
Efek-efek - bersih	4.664.758.489	4.532.679.804	*Marketable securities - net*
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	193.396.220	*Securities purchased under resale agreements*
Pendapatan bunga yang masih akan diterima	314.751.488	314.751.488	*Interest income receivables*
Pinjaman yang diberikan - bersih	20.112.894.443	19.866.083.129	*Loans - net*
Tagihan akseptasi	17.791.739	17.791.739	*Acceptances receivable*
Aset lain-lain	21.740.496	21.740.496	*Other assets*
Jumlah aset keuangan	**26.929.036.070**	**26.545.766.671**	***Total financial assets***
Liabilitas Keuangan			***Financial Liabilities***
Simpanan nasabah	23.332.111.500	23.332.111.500	*Deposits from customers*
Simpanan dari bank lain	591.017.972	591.017.972	*Deposits from other banks*
Efek-efek yang diterbitkan	2.289.412.649	2.316.217.340	*Securities issued*
Efek-efek yang dijual dengan janji dibeli kembali	587.475.014	587.475.014	*Securities sold under repurchase agreement*
Liabilitas akseptasi	17.005.026	17.005.026	*Acceptances payable*
Beban yang masih harus dibayar	103.156.225	103.156.225	*Accrued expenses*
Liabilitas lain-lain	84.125.294	84.125.294	*Other liabilities*
Jumlah liabilitas keuangan	**27.004.303.680**	**27.031.108.371**	***Total financial liabilities***

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut:

a. Efek-efek

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Jika informasi ini tidak tersedia, nilai wajar diestimasi dengan menggunakan harga pasar kuotasi efek yang memiliki karakteristik kredit, jatuh tempo dan *yield* yang serupa (tingkat 2 - hierarki nilai wajar).

b. Pinjaman yang diberikan

Pinjaman yang diberikan dinyatakan berdasarkan jumlah nilai tercatat setelah dikurangi oleh beban penurunan nilai. Estimasi nilai wajar dari pinjaman yang diberikan mencerminkan jumlah diskonto dari estimasi kini dari arus kas masa depan yang diharapkan akan diterima. Arus kas yang diharapkan didiskontokan pada tingkat suku bunga pasar terkini untuk menentukan nilai wajar (tingkat 3 - hierarki nilai wajar).

The methods and assumptions used to estimate fair value are as follows:

a. Marketable securities

The fair value for securities measured at amortised cost is based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). Where this information is not available, fair value is estimated using quoted market prices for securities with similar credit, maturity and yield characteristics (level 2 - fair value hierarchy).

b. Loans

Loans are recorded at carrying amount net of charges for impairment. The estimated fair value of loans represents the discounted amount of estimated future cash flows expected to be received. Estimated cash flows are discounted at current market rates to determine fair value (level 3 - fair value hierarchy).

48. NILAI WAJAR INSTRUMEN KEUANGAN (lanjutan)

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut: (lanjutan)

c. Efek-efek yang diterbitkan

Nilai wajar untuk efek-efek yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi perantara (*broker*)/pedagang efek (*dealer*) (tingkat 1 - hierarki nilai wajar). Nilai wajar agregat dihitung berdasarkan harga pasar kuotasi. Jika informasi ini tidak tersedia, model diskonto arus kas digunakan berdasarkan kurva *yield* terkini yang sesuai dengan sisa periode jatuh temponya (tingkat 2 - hierarki nilai wajar).

d. Sebagian besar dari instrumen keuangan yang tidak diukur pada nilai wajar, diukur pada biaya perolehan diamortisasi. Berikut daftar instrumen keuangan yang nilai tercatatnya mendekati nilai wajarnya, contohnya, instrumen keuangan jangka pendek atau yang ditinjau ulang menggunakan harga pasar secara berkala.

Aset Keuangan:
- Kas
- Giro pada Bank Indonesia
- Giro pada bank lain
- Penempatan pada Bank Indonesia dan bank lain
- Efek-efek
- Efek-efek yang dibeli dengan janji dijual Kembali
- Pinjaman yang diberikan
- Pendapatan bunga yang masih akan diterima
- Tagihan akseptasi
- Aset lain-lain

Liabilitas Keuangan:
- Simpanan nasabah
- Simpanan dari bank lain
- Efek-efek yang diterbitkan
- Efek-efek yang dijual dengan janji dibeli kembali
- Liabilitas akseptasi
- Akrual dan liabilitas lain-lain

48. FAIR VALUE OF FINANCIAL INSTRUMENTS (continued)

The methods and assumptions used to estimate fair value are as follows: (continued)

c. Securities issued

The fair value for securities issued measured at amortised cost based on market prices or broker/dealer price quotations (level 1 - fair value hierarchy). The aggregate fair values are calculated based on quoted market prices. For those notes where quoted market prices are not available, a discounted cash flow model is used based on a current yield curve appropriate for the remaining term to maturity (level 2 - fair value hierarchy).

d. Majority of the financial instrument not measured at fair value are measured at amortised cost. The following are financial instruments for which their carrying amount are reasonable approximation of fair value because, for example, they are short term in nature or re-price to current market rates frequently.

Financial Assets:
- *Cash*
- *Current accounts with Bank Indonesia*
- *Current accounts with other banks*
- *Placement with Bank Indonesia and other banks*
- *Marketable securities*
- *Securities purchased under resale agreements*
- *Loans*
- *Interest income receivables*
- *Acceptances receivable*
- *Other assets*

Financial Liabilities:
- *Deposits from customers*
- *Deposits from other banks*
- *Securities issued*
- *Securities sold under repurchase agreements*
- *Acceptances payable*
- *Accrued and other liabilities*

49. MANAJEMEN MODAL

Tujuan utama dari kebijakan Bank atas kebijakan pengelolaan modal adalah untuk memastikan bahwa Bank memiliki modal yang kuat untuk mendukung strategi pengembangan ekspansi usaha Bank saat ini dan mempertahankan kelangsungan pengembangan di masa mendatang, dan untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

Bank menyusun Rencana Permodalan berdasarkan penilaian dari penelaahan atas kebutuhan kecukupan permodalan yang dipersyaratkan dan mengkombinasikannya dengan tinjauan perkembangan ekonomi terkini. Bank senantiasa akan menghubungkan tujuan keuangan dan kecukupan modal terhadap risiko melalui proses perencanaan modal, begitu pula dengan bisnis yang didasarkan pada permodalan dan persyaratan likuiditas Bank.

Kebutuhan permodalan Bank juga direncanakan dan didiskusikan secara rutin yang didukung dengan data analisis.

Rencana Permodalan disusun oleh Direksi sebagai bagian dari Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Perencanaan ini diharapkan akan memastikan tersedianya modal yang cukup dan terciptanya struktur permodalan yang optimal untuk mendukung strategi Bank.

Bank telah melakukan perhitungan kecukupan modal berdasarkan ketentuan Bank Indonesia yang berlaku, dimana modal yang dimiliki diklasifikasikan dalam 2 *Tier* yaitu Modal *Tier* I dan Modal *Tier* II.

Bank mematuhi semua persyaratan modal yang ditetapkan oleh pihak eksternal sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

49. CAPITAL MANAGEMENT

The primary objectives of the Bank's capital management policy are to ensure that the Bank has a strong capital to support the Bank's business expansion strategy currently to sustain future development of the business, to meet regulator capital adequacy requirements and also to ensure the efficiency of Bank's capital structure.

The Bank undertakes Capital Planning based on assessment and review of the capital situation in terms of the legal capital adequacy requirement, combined with assessment of economic outlooks. The Bank will continue to link financial and capital adequacy goals to risk appetite through the capital planning process as well as assess the businesses based on the Bank's capital and liquidity requirements.

The capital needs of the Bank are also discussed and planned on a routine basis as supported by data analysis.

Capital Planning is prepared by Directors as part of the Bank's Business Plan and is approved by the Board of Commissioners. Capital Planning ensures that adequate levels of capital and an optimum mix of the different components of capital are maintained to support the Bank's strategy.

The Bank calculated its capital adequacy requirements using the prevailing Bank Indonesia regulation, where the regulatory capital is classified into 2 Tiers, mainly Tier I Capital and Tier II Capital.

The Bank has complied with all externally imposed capital requirements throughout the reporting period, particularly regarding Capital Adequacy Ratio (CAR) and calculation of Risk Weighted Assets (RWA).

50. INFORMASI TAMBAHAN

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan untuk diungkapkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan.

Giro wajib minimum

Saldo giro pada Bank Indonesia adalah untuk memenuhi persyaratan Giro Wajib Minimum (GWM) dari Bank Indonesia.

Berdasarkan Peraturan Bank Indonesia (PBI) No. 20/3/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No. 24/4/PBI/2022 tanggal 1 Maret 2022 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 20/3/PBI/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; Peraturan Anggota Dewan Gubernur (PADG) No. 20/10/PADG/2018 tanggal 31 Mei 2018, sebagaimana telah diubah beberapa kali, terakhir dengan PADG No. 24/3/PADG/2022 tanggal 1 Maret 2022 tentang Perubahan Kedelapan atas Peraturan Anggota Gubernur No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah; dan Peraturan Anggota Dewan Gubernur (PADG) No. 24/8/PADG/2022 tanggal 1 Juli 2022, sebagaimana telah diubah beberapa kali, terakhir dengan PADG No. 8 Tahun 2025 tanggal 27 Maret 2025 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur Nomor 24/8/PADG/2022 tentang Peraturan Pelaksanaan Pemenuhan Giro Wajib Minimum Dalam Rupiah dan Valuta Asing Bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah sebagaimana telah diubah sebanyak 4 (empat) kali melalui PADG No. 2 tahun 2023 tanggal 24 Maret 2023, PADG No. 12 tahun 2023 tanggal 27 September 2023, PADG No. 8 tahun 2025 tanggal 27 Maret 2025, dan PADG No. 31 tahun 2025 tanggal 23 Desember 2025 Bank wajib memenuhi rasio Giro Wajib Minimum (GWM) seperti yang disyaratkan Bank Indonesia dalam Rupiah dan valuta asing secara harian dan rata-rata dari rata-rata Dana Pihak Ketiga (DPK) dalam Rupiah dan valuta asing selama periode laporan tertentu.

50. ADDITIONAL INFORMATION

The following additional information is information that is not required to be disclosed by Indonesian Financial Accounting Standards. Such additional information was prepared in accordance with regulations of Financial Services Authority.

Minimum statutory requirements

Current accounts with Bank Indonesia are provided to fulfill Bank Indonesia's requirements on Minimum Reserve Requirements (GWM).

In accordance with Bank Indonesia Regulation (PBI) No. 20/3/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No. 24/4/PBI/2022 dated March 1, 2022 concerning the Fourth Amendment to Bank Indonesia Regulation No. 20/3/PBI/2018 concerning Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units; and Regulation of Members of the Board of Governors (PADG) No. 20/10/PADG/2018 dated May 31, 2018, as amended several times, most recently with PADG No. 24/3/PADG/2022 dated March 1, 2022 concerning the Eighth Amendment to the Regulation of Members of the Governor No. 20/10/PADG/2018 concerning Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units, Regulation of Members of the Board of Governors (PADG) No. 24/8/PADG/2022 dated July 1, 2022, as amended several times, most recently with PADG No. 8 year 2025 dated March 27, 2025 concerning the Third Amendment to the Regulation of Members of the Board of Governors PADG No. 24/8/PADG/2022 concerning the Implementation Regulations for Fulfillment of Statutory Reserves in Rupiah and Foreign Exchange for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units as amended 4 (four) times through PADG No. 2 year 2023 dated March 24, 2023, PADG No. 12 year 2023 dated September 27, 2023, PADG No. 8 year 2025 dated March 27, 2025 and PADG No. 31 year 2025 dated December 23, 2025. Banks are required to meet the Statutory Reserves (GWM) ratio as required by Bank Indonesia in Rupiah and foreign currencies on a daily basis and the average of the average Third Party Funds (TPF) in Rupiah and foreign currencies during a specific reporting period.

50. INFORMASI TAMBAHAN (lanjutan)

Giro wajib minimum (lanjutan)

PADG GWM Nomor 24/8/PADG/2022 mengonsolidasikan seluruh perubahan pada PADG No. 20/10/PADG/2018 tentang Giro Wajib Minimum dalam Rupiah dan Valuta Asing bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, tanpa mengubah substansi pengaturan selain perubahan besaran GWM dan bagian yang diperhitungkan untuk mendapat remunerasi. Selanjutnya, pada saat PADG GWM Nomor 24/8/PADG/2022 mulai berlaku tanggal 1 Juli 2022, PADG Nomor 20/10/PADG/2018 berserta perubahan-perubahannya dicabut dan dinyatakan tidak berlaku.Pada tanggal 31 Desember 2025 dan 2024, rasio GWM rata-rata dalam Rupiah yang wajib dipenuhi adalah sebesar 10%, dan rasio GWM rata-rata dalam valuta asing yang wajib dipenuhi sebesar 4%.

Bank Indonesia melakukan penguatan kebijakan insentif untuk mendorong peranan perbankan dalam pembiayaan kepada sektor prioritas sesuai Peraturan Bank Indonesia (PBI) No. 24/5/PBI/2022 tentang Insentif bagi Bank yang Memberikan Penyediaan Dana untuk Kegiatan Ekonomi Tertentu dan Inklusif tanggal 25 Februari 2022, sebagaimana diatur lebih lanjut melalui PADG No. 24/4/PADG/2022 tanggal 1 Maret 2022 sebagaimana telah mengalami beberapa kali perubahan, terakhir dengan PADG No. 7 Tahun 2025 tanggal 26 Maret 2025 tentang Perubahan Ketiga atas Peraturan Anggota Dewan Gubernur Nomor 11 Tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial.

Bank memperoleh Insentif Kebijakan Likuiditas Makroprudensial (KLM) sebesar 5,4% berlaku dari 1 Desember 2025 sampai dengan 31 Desember 2025 sehingga GWM rata-rata dalam Rupiah yang wajib dipenuhi oleh Bank adalah 3,6%.

50. ADDITIONAL INFORMATION (continued)

Minimum statutory requirements (continued)

PADG GWM Number 24/8/PADG/2022 consolidates all amendments to PADG Number 20/10/PADG/2018 concerning the Minimum Statutory Reserves in Rupiah and Foreign Currency for Conventional Commercial Banks, Islamic Commercial Banks, and Islamic Business Units, without altering the regulatory substance other than changes to the reserve requirement amounts and the components eligible for remuneration. Furthermore, when PADG GWM Number 24/8/PADG/2022 comes into effect on July 1, 2022, PADG Number 20/10/PADG/2018 along with its amendments is revoked and declared no longer valid. As of December 31, 2025 and 2024, the average GWM ratio in Rupiah that must be fulfilled is at 10%, and the average GWM ratio in foreign currencies that must be fulfilled is at 4%.

Bank Indonesia has strengthened incentive policy to stimulate the role of banks in financing priority sectors in accordance with Bank Indonesia Regulation (PBI) No. 24/5/PBI/2022 regarding Incentives for Banks Providing Funds for Certain and Inclusive Economic Activities dated February 25, 2022, as further regulated through PADG No. 24/4/PADG/2022 dated March 1, 2022 as amended several times, most recently with PADG No. 7 year 2025 dated March 26, 2025 concerning the Third Amendment to the Regulation of Members of the Board of Governors No. 11 year 2023 concerning Regulations for Implementing Macroprudential Liquidity Incentive Policy.

Bank received a Macroprudential Liquidity Policy Incentive of 5.4% valid from December 1, 2025 until December 31, 2025 therefore GWM ratio in Rupiah that must be fulfilled by the Bank is at 3.6%.

50. INFORMASI TAMBAHAN (lanjutan)

Disamping itu, berdasarkan PBI No. 20/4/PBI/2018 tanggal 29 Maret 2018 sebagaimana telah beberapa kali diubah, terakhir dengan PBI No.24/16/PBI/2022 tanggal 1 November 2022 tentang Perubahan Keempat atas Peraturan Bank Indonesia No. 20/4/PBI/2018 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudential bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah dan PADG No.21/22/PADG/2019 tanggal 28 November 2019 sebagaimana telah mengalami beberapa kali perubahan, terakhir dengan PADG No. 18 Tahun 2023 tanggal 29 November 2023 tentang Perubahan Ketujuh atas Peraturan Anggota Dewan Gubernur No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudential dan Penyangga Likuiditas Makroprudential bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, Bank wajib memenuhi Rasio Intermediasi Makroprudential (RIM) dan Penyangga Likuiditas Makroprudential (PLM) dari rata-rata DPK dalam Rupiah selama periode laporan tertentu.

Peraturan ini, sebagaimana diubah terakhir melalui PBI No. 24/16/PBI/2022 tanggal 31 Oktober 2022 tentang Perubahan Keempat atas PBI No. 20/4/PBI/2018 mengenai Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, dijelaskan lebih lanjut dalam PADG No. 23 Tahun 2025 tanggal 20 Oktober 2025 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, yang mencabut PADG No. 21/22/PADG/2019 tanggal 28 November 2019 beserta seluruh ketentuan perubahannya. Dalam ketentuan tersebut, besaran PLM ditetapkan sebesar 4% (empat persen) dari DPK BUK dalam Rupiah, sedangkan besaran PLM untuk Entitas Anak yang menjalankan kegiatan usaha berdasarkan prinsip syariah ditetapkan sebesar 2,5% (dua koma lima persen) dari DPK Entitas Anak dalam Rupiah.

Pada tanggal 31 Desember 2025 dan 2024, rasio PLM yang wajib dipenuhi minimal masing-masing sebesar 5%.

50. ADDITIONAL INFORMATION (continued)

Furthermore, based on PBI No. 20/4/PBI/2018 dated March 29, 2018 as amended several times, most recently with PBI No.24/16/PBI/2022 dated November 1, 2022 concerning the Fourth Amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 concerning Ratio Macroprudential Intermediation and Macroprudential Liquidity Support for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units; and PADG No.21/22/PADG/2019 dated November 28, 2019 as amended several times, most recently with PADG No. 18 year 2023 dated November 29, 2023 concerning the Seventh Amendment to the Regulation of Members of the Board of Governors No. 21/22/PADG/2019 concerning Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units, Banks must meet the Macroprudential Intermediation Ratio (RIM) and Macroprudential Liquidity Buffer (PLM) of the average TPF in Rupiah during specific reporting periods.

This regulation, as last amended by Bank Indonesia Regulation (PBI) No. 24/16/PBI/2022 dated 31 October 2022, concerns the Fourth Amendment to PBI No. 20/4/PBI/2018 regarding the Macroprudential Intermediation Ratio and the Macroprudential Liquidity Buffer for Conventional Commercial Banks, Islamic Commercial Banks, and Islamic Business Units. The regulation is further elaborated through PADG No. 23 of 2025 dated 20 October 2025 concerning the Macroprudential Intermediation Ratio and the Macroprudential Liquidity Buffer for Conventional Commercial Banks, Islamic Commercial Banks, and Islamic Business Units, which revokes PADG No. 21/22/PADG/2019 dated 28 November 2019 on the same subject, including all of its amendments. Under this regulation, the Macroprudential Liquidity Buffer (PLM) is set at 4% (four percent) of Rupiah third-party funds (DPK) for Conventional Commercial Banks, and 2.5% (two point five percent) of Rupiah third-party funds (DPK) for subsidiaries conducting business based on sharia principles.

As of December 31, 2025 and 2024, the minimum of PLM ratio that must be fulfilled is set at 5%, respectively.

50. INFORMASI TAMBAHAN (lanjutan)

Giro wajib minimum (lanjutan)

Giro RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo rekening giro pada Bank Indonesia. Parameter yang digunakan dalam pemenuhan giro RIM adalah sebagai berikut:

1. Batas bawah target RIM sebesar 84%
2. Batas atas target RIM sebesar 94%
3. KPMM Insentif sebesar 14%

Bank memiliki RIM diatas batas bawah target RIM, NPL kurang dari 5 (Catatan 11), dan KPMM diatas 19% sehingga Bank wajib memelihara Giro RIM menggunakan parameter disinsentif yang berlaku. Pada tanggal 31 Desember 2025 dan 2024, Giro RIM yang dimiliki Bank telah memenuhi ketentuan Bank Indonesia.

Bank telah memenuhi peraturan Bank Indonesia yang berlaku tentang Giro Wajib Minimum bank umum konvensional pada tanggal 31 Desember 2025 dan 2024.

Rasio GWM Bank pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

50. ADDITIONAL INFORMATION (continued)

Minimum statutory requirements (continued)

RIM demand deposits is the additional reserve that should be maintained by the Bank in the form of current accounts with Bank Indonesia. The parameters used in the fulfillment of RIM are as follow:

1. *Minimum target of RIM is 84%*
2. *Maximum target of RIM is 94%*
3. *Incentive of CAR is 14%*

Bank have RIM above the lower RIM target limit, NPL of less than 5 (Note 11), and have CAR above 19% therefore the Bank is required to maintain RIM demand deposits using the applicable disincentive parameters. As of December 31, 2025 and 2024, the RIM Current Account owned by the Bank has complied with the applicable Bank Indonesia regulations.

The Bank has fulfilled the prevailing Bank Indonesia's regulation regarding Minimum Reserve Requirements for conventional banks as of December 31, 2025 and 2024.

As of December 31, 2025 and 2024, the GWM ratios of the Bank are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Rupiah			*Rupiah*
Giro Wajib Minimum*)	4,58%	6,67%	*Minimum Statutory Reserve*)
Penyangga Likuiditas Makroprudensial**)	23,29%	21,78%	*Macroprudential Liquidity Buffer***)
GWM Rasio Intermediasi Makroprudensial***)	1,89%	4,76%	*GWM Macroprudential Intermediation Ratio***)
Valuta Asing	4,05%	4,05%	*Foreign Currencies*

*) Sebelumnya Giro Wajib Minimum Primer — *Previously Primary Minimum Statutory Reserve* *)
**) Sebelumnya Giro Wajib Minimum Sekunder — *Previously Secondary Minimum Statutory Reserve* **)
***) Sebelumnya Giro Wajib Minimum LFR — *Previously Loan to Funding Ratio Minimum Statutory Reserve* ***)

50. INFORMASI TAMBAHAN (lanjutan) / *50. ADDITIONAL INFORMATION (continued)*

Kewajiban Penyediaan Modal Minimum / *Minimum Capital Requirement*

Pada tanggal 31 Desember 2025 dan 2024, rasio Kewajiban Penyediaan Modal Minimum ("KPMM") Bank dihitung berdasarkan Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 sebagaimana terakhir dirubah melalui No. 27/POJK.03/2022 tentang Kewajiban Penyediaan Modal Minimum Bank Umum dengan memperhitungkan risiko kredit, risiko operasional dan risiko pasar. Rasio KPMM tersebut adalah sebagai berikut:

On December 31, 2025 and 2024, the Bank's Minimum Capital Requirement ("KPMM") ratio is calculated based on Financial Services Authority Regulation No. 11/POJK.03/2016 as last amended by No. 27/POJK.03/2022 concerning the Minimum Capital Requirement for Commercial Banks. The Bank's capital adequacy ratio with consideration for credit, operational and market risks. The KPMM ratio is as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Modal inti (*Tier* I)	4.000.450.331	3.584.008.030	*Core Capital (Tier I)*
Modal pelengkap (*Tier* II)	1.129.545.320	833.932.677	*Supplementary Capital (Tier II)*
Jumlah Modal	**5.129.995.651**	**4.417.940.707**	***Total Capital***
Aset Tertimbang Menurut Risiko untuk Risiko Kredit	19.283.625.642	18.182.056.435	*Risk Weighted Assets for Credit Risk*
Aset Tertimbang Menurut Risiko untuk Risiko Operasional	1.603.180.277	1.555.657.932	*Risk Weighted Assets for Operational Risk*
Aset Tertimbang Menurut Risiko untuk Risiko Pasar	627.275.415	785.592.132	*Risk Weighted Assets for Market Risk*
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit dan risiko operasional	24,56%	22,38%	*Capital Adequacy Ratio (CAR) with credit and operational risks*
Rasio Kewajiban Penyediaan Modal Minimum untuk risiko kredit, risiko operasional dan risiko pasar	23,84%	21,53%	*Capital Adequacy Ratio (CAR) with credit, operational and market risks*
Rasio Kewajiban Penyediaan Modal Minimum yang diwajibkan	9,00%	9,00%	*Minimum Capital Adequacy Ratio required*

Aset berdasarkan kolektibilitas / *Assets by collectibility*

Kolektibilitas aset sesuai dengan Peraturan Otoritas Jasa Keuangan ("POJK") No. 40/POJK.03/2019 tanggal 1 Januari 2020 tentang Penilaian Kualitas Aset Bank Umum adalah sebagai berikut:

Assets collectibility in accordance with Regulation of the Financial Services Authority ("POJK") No. 40/POJK.03/2019 dated January 1, 2020 regarding "Asset Quality Ratings for Conventional Bank" are as follows:

	31 Desember/*December 31, 2025*						
	Lancar/*Current*	**Dalam perhatian khusus/ *Special mention***	**Kurang lancar/ *Substandard***	**Diragukan/ *Doubtful***	**Macet/*Loss***	**Jumlah/*Total***	
Giro dan penempatan pada Bank Indonesia	2.643.191.018	-	-	-	-	2.643.191.018	*Current accounts and placements with Bank Indonesia*
Giro pada bank lain	317.275.973	-	-	-	-	317.275.973	*Current accounts with other banks*
Efek-efek	10.075.611.567	-	-	-	-	10.075.611.567	*Marketable securities*
Pinjaman yang diberikan	20.943.525.892	879.921.090	47.188.969	661.689	508.868.576	22.380.166.216	*Loan*
Pendapatan bunga yang masih akan diterima	264.749.470	66.815.892	2.182.233	-	-	333.747.595	*Interest income receivables*
Penyertaan saham	-	-	-	-	-	-	*Investment in shares*
Tagihan akseptasi	21.291.371	-	-	-	-	21.291.371	*Acceptances receivable*
Tagihan derivatif	278.000	-	-	-	-	278.000	*Derivative receivables*
Agunan yang diambil alih	-	410.971.611	47.873.275	35.126.650	-	493.971.536	*Foreclosed assets*
Aset lain-lain*)	561.878	-	14.601.166	16.323.794	1.309.969	32.796.807	*Other assets*)*
Jumlah	34.266.485.169	1.357.708.593	111.845.643	52.112.133	510.178.545	36.298.330.083	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(220.101.705)	(317.106.427)	(42.595.888)	(24.527.837)	(162.423.193)	(766.755.050)	*Less : Allowance for impairment losses*
Jumlah - bersih	**34.046.383.464**	**1.040.602.166**	**69.249.755**	**27.584.296**	**347.755.352**	**35.531.575.033**	***Total - net***

50. INFORMASI TAMBAHAN (lanjutan) / *50. ADDITIONAL INFORMATION (continued)*

Aset berdasarkan kolektibilitas (lanjutan) / *Assets by collectibility (continued)*

Kolektibilitas aset sesuai dengan Peraturan Otoritas Jasa Keuangan ("POJK") No. 40/POJK.03/2019 tanggal 1 Januari 2020 tentang Penilaian Kualitas Aset Bank Umum adalah sebagai berikut:

Assets collectibility in accordance with Regulation of the Financial Services Authority ("POJK") No. 40/POJK.03/2019 dated January 1, 2020 regarding "Asset Quality Ratings for Conventional Bank" are as follows:

31 Desember/*December 31, 2024*

	Lancar/*Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Giro dan penempatan pada Bank Indonesia	1.413.252.981	-	-	-	-	1.413.252.981	*Current accounts and placements with Bank Indonesia*
Giro pada bank lain	114.518.280	-	-	-	-	114.518.280	*Current accounts with other banks*
Efek-efek	7.463.989.140	-	-	-	-	7.463.989.140	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	197.775.620	-	-	-	-	197.775.620	*Securities purchased under resale agreements*
Pinjaman yang diberikan	19.197.768.646	688.873.837	62.185.617	5.102.838	605.929.383	20.559.860.321	*Loans*
Pendapatan bunga yang masih akan diterima	244.723.115	74.173.423	1.942.927	-	-	320.839.465	*Interest income receivables*
Penyertaan saham	219.933.809	-	-	-	-	219.933.809	*Investment in shares*
Tagihan akseptasi	17.791.739	-	-	-	-	17.791.739	*Acceptances receivable*
Tagihan derivatif	795.408	-	-	-	-	795.408	*Derivative receivables*
Agunan yang diambil alih	-	450.876.841	93.238.445	-	-	544.115.286	*Foreclosed assets*
Aset lain-lain*)	1.714.304	-	30.924.960	223.984	1.106.292	33.969.540	*Other assets**)
Jumlah	28.872.263.042	1.213.924.101	188.291.949	5.326.822	607.035.675	30.886.841.589	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(151.618.286)	(222.048.167)	(79.950.907)	(1.387.349)	(164.494.165)	(619.498.874)	*Less : Allowance for impairment losses*
Jumlah - bersih	**28.720.644.756**	**991.875.934**	**108.341.042**	**3.939.473**	**442.541.510**	**30.267.342.715**	***Total - net***

*) Aset lain-lain terdiri atas properti terbengkalai dan *suspense account*.

*) *Other assets consist of abandoned property and suspense account.*

Rekening administratif berdasarkan kolektibilitas / *Administrative account by collectibility*

Kolektibilitas rekening administratif sesuai dengan Peraturan Otoritas Jasa Keuangan ("POJK") No. 40/POJK.03/2019 tanggal 1 Januari 2020 tentang Penilaian Kualitas Aset Bank Umum adalah sebagai berikut:

Administrative account collectibility in accordance with Regulation of the Financial Services Authority ("POJK") No. 40/POJK.03/2019 dated January 1, 2020 regarding "Asset Quality Ratings for Conventional Bank" are as follows:

31 Desember/*December 31, 2025*

	Lancar/*Current*	DPK/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Fasilitas pinjaman yang belum digunakan	6.810.260.413	6.718.041	-	-	5.655.000	6.822.633.454	*Unused loans facilities*
Bank garansi	179.024.353	-	-	-	-	179.024.353	*Bank guarantee*
Letter of credit	11.624.507	-	-	-	-	11.624.507	*Letter of credit*
Jumlah	7.000.909.273	6.718.041	-	-	5.655.000	7.013.282.314	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(645.955)	-	-	-	-	(645.955)	*Less : Allowance for impairment losses*
Jumlah - bersih	**7.000.263.318**	**6.718.041**	**-**	**-**	**5.655.000**	**7.012.636.359**	***Total - net***

31 Desember/*December 31, 2024*

	Lancar/*Current*	DPK/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Fasilitas pinjaman yang belum digunakan	4.646.143.976	15.419.689	-	-	-	4.661.563.665	*Unused loans facilities*
Bank garansi	522.142.989	-	-	-	-	522.142.989	*Bank guarantee*
Letter of credit	169.275.405	-	-	-	-	169.275.405	*Letter of credit*
Jumlah	5.337.562.370	15.419.689	-	-	-	5.352.982.059	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(1.270.842)	-	-	-	-	(1.270.842)	*Less : Allowance for impairment losses*
Jumlah - bersih	**5.336.291.528**	**15.419.689**	**-**	**-**	**-**	**5.351.711.217**	***Total - net***

50. INFORMASI TAMBAHAN (lanjutan) / *50. ADDITIONAL INFORMATION (continued)*

Berdasarkan pihak dan sektor ekonomi / ***By counterparties and economic sector***

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak Berelasi			***Related Parties***
Real estate	84.806.448	-	*Real estate*
Industri	66.414.392	78.612.786	*Industry*
Lembaga pembiayaan	28.003.281	940.667	*Financing*
Perdagangan, restoran, dan hotel	20.298.976	23.722.610	*Trading, restaurant, and hotel*
Lain-lain	20.107.840	20.191.048	*Others*
Sub jumlah	219.630.937	123.467.111	*Sub total*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak Ketiga			***Third Parties***
Lembaga pembiayaan	5.083.931.499	5.576.744.319	*Financing*
Perdagangan, restoran, dan hotel	4.551.937.746	4.068.926.696	*Trading, restaurant, and hotel*
Industri	3.750.739.867	2.936.443.715	*Industry*
Real estate	2.977.159.386	2.476.932.930	*Real estate*
Konstruksi	1.110.646.471	1.100.319.988	*Construction*
Jasa-jasa sosial/masyarakat	515.917.326	417.106.763	*Social community service*
Lain-lain	4.170.202.984	3.859.918.799	*Others*
Sub jumlah	22.160.535.279	20.436.393.210	*Sub total*
Jumlah	22.380.166.216	20.559.860.321	*Total*
Dikurangi: Cadangan kerugian penurunan nilai	(558.646.478)	(446.965.878)	*Less: Allowance for impairment losses*
Jumlah - bersih	**21.821.519.738**	**20.112.894.443**	***Total - net***

Pada tanggal 31 Desember 2025 dan 2024, rasio pinjaman kepada Usaha Mikro kecil terhadap pinjaman yang diberikan sesuai dengan Surat Edaran Bank Indonesia No.13/30/DPNP tanggal 16 Desember 2011 masing-masing sebesar 15,06% dan 15,43% .

As of December 31, 2025 and 2024, the ratio of Micro Business loans to the total loans in accordance with Bank Indonesia Circular Letter No.13/30/DPNP dated December 16, 2011, was 15.06% and 15.43%, respectively (unaudited).

Pinjaman yang diberikan yang mengalami penurunan nilai dan cadangan kerugian penurunan nilainya berdasarkan sektor ekonomi

Impaired loans receivables and allowances for impairment losses by economic sector

Pinjaman yang mengalami penurunan nilai berdasarkan sektor ekonomi dan cadangan yang dibentuk:

Impaired loan based on economic sector and allowance:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Perdagangan, restoran dan hotel	556.619.458	268.365.343	*Trading, restaurant, and hotel*
Real estate	512.105.824	542.943.876	*Real estate*
Konstruksi	131.100.305	102.984.849	*Construction*
Industri	109.475.710	151.949.080	*Industry*
Jasa-jasa sosial/masyarakat	72.797.796	59.584.544	*Social/community services*
Lain-lain	105.235.538	252.080.946	*Others*
	1.487.334.631	1.377.908.639	
Dikurangi: Cadangan kerugian penurunan nilai	(464.988.172)	(360.437.669)	*Less: Allowance for impairment losses*
Jumlah - bersih	**1.022.346.459**	**1.017.470.969**	***Total - net***

50. INFORMASI TAMBAHAN (lanjutan) / *50. ADDITIONAL INFORMATION (continued)*

Non-Performing Loan

Rasio / ***Ratio***

Rasio pinjaman bermasalah (*Non-Performing Loan - NPL*) kotor Bank terhadap total pinjaman yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar 2,49% dan 3,27%. Rasio NPL neto Bank terhadap total pinjaman yang diberikan pada tanggal 31 December 2025 dan 31 Desember 2024 masing-masing sebesar 1,73% dan 2,36%.

The ratio of Non-Performing Loan (NPL)-gross of the Bank as of December 31, 2025 and 2024 was 2.49% and 3.27% to total loans, respectively. Ratio NPL-net to total loans of the Bank as of December 31, 2025 and 2024 was 1.73% and 2.36%, respectively.

Berdasarkan jenis kredit / ***By loan type***

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pinjaman tetap dengan angsuran	280.986.154	401.146.951	*Fixed loans with installments*
Pinjaman tetap	196.621.416	192.143.914	*Fixed loans*
Pinjaman rekening koran	67.721.168	64.720.627	*Overdraft loans*
Pinjaman konsumen	11.119.285	12.626.097	*Consumer loans*
Pinjaman serba guna	271.212	2.580.249	*Other loans*
Jumlah	**556.719.235**	**673.217.838**	***Total***
Dikurangi: Cadangan kerugian penurunan nilai	(169.862.417)	(188.220.140)	*Less: Allowance for impairment losses*
Jumlah - bersih	**386.856.818**	**484.997.698**	***Total - net***

Risiko pasar / ***Market risk***

LFR *(Loan to Funding Ratio)* Bank pada tanggal 31 Desember 2025 dan 2024 masing-masing adalah sebesar 84,32% dan 86,27%.

The Loan to Funding Ratio (LFR) of the Bank as of December 31, 2025 and 2024 are 84.32% and 86.27%, respectively.

Risiko mata uang / *Currency risk*

Bank memiliki eksposur risiko mata uang akibat adanya transaksi dalam valuta asing. Bank memonitor risiko konsentrasi yang terjadi untuk setiap valuta sehubungan dengan penjabaran transaksi dalam valuta asing ke dalam aset dan liabilitas moneter dalam Rupiah.

The Bank is exposed to currency risk through transaction in foreign currencies. The Bank monitors any concentration risk in relation to any individual currency in regard to the translation of foreign currency transactions into monetary assets and liabilities in Rupiah.

50. INFORMASI TAMBAHAN (lanjutan) / *50. ADDITIONAL INFORMATION (continued)*

Risiko pasar (lanjutan) / ***Market risk (continued)***

Pengelolaan posisi valuta asing Bank dilakukan dengan cara mengendalikan Posisi Devisa Neto ("PDN") Bank secara keseluruhan.

The Bank's foreign currency position management is conducted by managing the Bank's overall Net Open Position ("NOP").

Valuta / *Currencies*	31 Desember/*December 31, 2025* Aset/ *Assets*	Liabilitas/ *Liabilities*	Posisi Devisa Neto (nilai absolut)/ *Net Open Position (absolute amount)*
Keseluruhan (laporan posisi keuangan dan rekening administratif) / *Aggregate (statements of financial position and administrative accounts)*			
Dolar Amerika Serikat / *United States Dollar*	1.482.118.732	1.485.261.091	3.142.359
Yuan China / *Chinese Yuan*	10.609.591	9.991.761	617.830
Yen Jepang / *Japanese Yen*	2.878.993	2.803.187	75.807
Dolar Singapura / *Singapore Dollar*	1.275.166	1.104.728	170.438
Euro Eropa / *European Euro*	352.258	1.128.258	776.000
Dolar New Zealand / *New Zealand Dollar*	42.257	-	42.257
Swiss Franc / *Swiss Franc*	105.763	-	105.763
Dolar Kanada / *Canadian Dollar*	28.594	-	28.594
Dolar Australia / *Australian Dollar*	9.591	-	9.591
Riyal Arab Saudi / *Saudi Riyal*	9.382	-	9.382
Won Korea / *Korean Won*	2.902	-	2.902
Dolar Taiwan / *New Taiwan Dollar*	2.814	-	2.814
Poundsterling Inggris / *Great Britain Poundsterling*	2.132	-	2.132
Thailand Bath / *Thailand Baht*	1.102	-	1.102
Dolar Hongkong / *Hongkong Dollar*	621	-	621
Ringgit Malaysia / *Malaysian Ringgit*	296	-	296
Total / ***Total***			**4.987.885**
Jumlah ekuitas / *Total equity*			5.192.415.045
Rasio PDN / ***NOP Ratio***			**0,10%**

Valuta / *Currencies*	31 Desember/*December 31, 2024* Aset/ *Assets*	Liabilitas/ *Liabilities*	Posisi Devisa Neto (nilai absolut)/ *Net Open Position (absolute amount)*
Keseluruhan (laporan posisi keuangan dan rekening administratif) / *Aggregate (statements of financial position and administrative accounts)*			
Dolar Amerika Serikat / *United States Dollar*	1.028.316.050	1.035.903.208	7.587.158
Yuan China / *Chinese Yuan*	326.132.294	(325.277.579)	854.715
Yen Jepang / *Japanese Yen*	3.667.468	(3.652.877)	14.591
Euro Eropa / *European Euro*	991.443	(1.623.030)	631.587
Dolar Singapura / *Singapore Dollar*	697.256	(721.197)	23.941
Swiss Franc / *Swiss Franc*	89.610	-	89.610
Dolar Kanada / *Canadian Dollar*	59.929	-	59.929
Dolar New Zealand / *New Zealand Dollar*	57.944	-	57.944
Dolar Australia / *Australian Dollar*	54.073	-	54.073
Poundsterling Inggis / *Great Britain Poundsterling*	37.303	-	37.303
Baht Thailand / *Thailand Baht*	3.758	-	3.758
Dolar Taiwan / *New Taiwan Dollar*	2.602	-	2.602
Won Korea / *Korean Won*	1.638	-	1.638
Ringgit Malaysia / *Malaysian Ringgit*	1.079	-	1.079
Dolar Hongkong / *Hongkong Dollar*	187	-	187
Total / ***Total***			9.420.115
Jumlah ekuitas / *Total equity*			4.417.349.503
Rasio PDN / ***NOP Ratio***			**0,21%**

50. INFORMASI TAMBAHAN (lanjutan)

Risiko operasional

Risiko operasional adalah risiko kerugian yang langsung ataupun tidak langsung yang terjadi karena tidak memadainya atau karena adanya kegagalan proses internal, kesalahan manusia, kegagalan sistem, dan/atau adanya kejadian-kejadian eksternal yang mempengaruhi operasional Bank.

Risiko ini melekat dalam semua proses bisnis, kegiatan operasional, sistem dan produk Bank, dari mulai Kantor Pusat sampai Kantor Kas. Kegagalan mengelola risiko operasional dapat menyebabkan kerugian keuangan, keselamatan karyawan dan reputasi Bank hingga akhirnya mempengaruhi kecukupan modal Bank. Tujuan Bank dalam mengelola risiko operasional adalah meminimalisasi dampak kegagalan atau ketidakcukupan proses internal, faktor manusia, sistem atau kejadian-kejadian eksternal yang dapat mempunyai dampak kerugian.

Bank menerapkan manajemen risiko operasional dengan sasaran memastikan bahwa Bank telah melakukan proses manajemen risiko yang meliputi identifikasi, penilaian, pengkajian, mitigasi risiko serta dilakukan pengawasan dan pelaporan atas pelaksanaannya. Hal tersebut dilakukan dengan tujuan akhir memaksimalkan *benefit* dari suatu produk/layanan atau proses transaksi/aktivitas dengan potensi atas risiko operasional yang telah diperhitungkan.

Proses pengkajian risiko dilakukan untuk menilai kecukupan pengendalian internal serta proses identifikasi dan penelaahan risiko untuk setiap proses dan produk di masing-masing unit kerja untuk memastikan kepatuhan terhadap kebijakan, peraturan dan batasan-batasan yang dibuat oleh manajemen Bank. Pengelolaan risiko operasional juga dilakukan dengan memperkuat aspek keamanan dan kehandalan operasi dari teknologi informasi sehingga kesalahan manusia, kecurangan, kesalahan proses dan potensi kegagalan sistem yang dapat menyebabkan terganggunya kelangsungan bisnis dapat ditekan dan diantisipasi lebih dini.

Dalam pemantauan risiko operasional, fungsi Satuan Kerja Audit Internal (SKAI) melaksanakan penilaian terhadap penerapan kebijakan dan prosedur manajemen risiko pada setiap aktivitas fungsional, produk atau layanan baru dan Satuan Kerja Manajemen Risiko (SKMR) memastikan proses identifikasi, pengukuran, pemantauan dan pengendalian risiko berjalan dengan efektif pada setiap aktivitas fungsional, produk atau layanan baru.

50. ADDITIONAL INFORMATION (continued)

Operational risk

Operational risk is the risk of direct or indirect loss resulting from inadequate or failure in internal processes, people and systems and/or from external problems that affect the Bank's operations.

This type of risk is inherent in all business processes, operational activities, systems and products of the Bank, from Head Office to Cash Office. Failure to manage operational risks properly could lead to financial losses, loss of employee safety, and reputation of the Bank until affected capital adequacy of the Bank. The Bank's objective in managing operational risk is to minimise the impact of the failure or inadequate internal process, people, system or from external events, which could have financial loss impact.

The Bank applies the operational risk management with the main target to ensure that the Bank has conducted a risk management process that includes risk identification, risk assessment, risk evaluation, risk mitigation and conducted monitoring and reporting on implementation. This is done with the ultimate target to maximise the benefits of a product/service or process transactions/activities with potential operational risks that have been taken into account.

A risk assessment process is carried out to evaluate the adequacy of internal control and risk identification and assessment in every process and product in each working unit to ensure compliance with the policies, rules and limits set down by the Bank's management. Operational risk management is also performed by strengthening security and operational aspects of information technology so that human error, fraud, processing errors and system failure that can affect business continuity can be anticipated and reduced.

In monitoring operational risk, the Internal Audit (SKAI) conducted an assessment of the implementation of risk management policies and procedures in each functional activity, new products or services and Risk Management Unit (SKMR) function ensures the identification, measurement, monitoring and risk control work effectively on any functional activity, new products or services.

50. INFORMASI TAMBAHAN (lanjutan)

Risiko operasional (lanjutan)

Pengawasan oleh Dewan Komisaris dan Direksi Bank atas profil risiko Bank dan pelaksanaan manajemen risiko dilakukan melalui rapat yang dilakukan secara berkala dengan jadwal yang telah ditentukan.

Selain kebijakan dan metode tersebut di atas, Bank juga telah menerapkan upaya yang terus menerus dikembangkan untuk membangun lingkungan budaya yang mendukung pelaksanaan manajemen risiko operasional. Hal tersebut dilakukan melalui penguatan pada tiga lini pertahanan (*three line of defense*) yaitu pemberdayaan unit bisnis sebagai lini pertahanan pertama, pembentukan fungsi manajemen risiko operasional sebagai lini pertahanan kedua dan koordinasi kerja dengan Satuan Kerja Internal Audit (SKAI) sebagai lini pertahanan ketiga.

Risiko hukum

Risiko hukum adalah risiko akibat tuntutan hukum dan/atau kelemahan aspek yuridis. Kelemahan aspek yuridis tersebut antara lain disebabkan adanya ketiadaan peraturan perundang-undangan yang mendukung atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak dan pengikatan dokumen yang tidak sempurna.

Sebagai sebuah perusahaan yang berdiri dalam yuridiksi hukum Indonesia, Bank harus selalu tunduk terhadap segala peraturan hukum yang dikeluarkan oleh regulator industri perbankan di Indonesia. Selain itu, Bank juga harus mengikuti segala bentuk peraturan perundangan yang berlaku di masyarakat baik yang terkait secara langsung maupun tidak langsung dengan kegiatan usaha Bank. Kegagalan Bank dalam mengikuti peraturan hukum yang berlaku dapat mengakibatkan pada timbulnya tuntutan hukum yang akan ditujukan kepada Bank. Apabila tuntutan-tuntutan hukum yang diajukan kepada Bank memiliki nilai yang material, maka hal tersebut dapat memberikan dampak secara langsung terhadap kinerja keuangan Bank.

Bank melaksanakan identifikasi risiko hukum berdasarkan beberapa faktor-faktor yang meliputi tuntutan hukum, tidak adanya peraturan regulasi hukum yang mendukung, dan kelemahan perjanjian. Pengendalian risiko hukum dilakukan Bank dengan memastikan bahwa seluruh kegiatan dan hubungan kerja dengan pihak ketiga telah didasarkan pada aturan maupun persyaratan yang dapat melindungi kepentingan Bank dari segi hukum termasuk antisipasi terhadap potensi tuntutan dari pihak eksternal.

50. ADDITIONAL INFORMATION (continued)

Operational risk (continued)

Monitoring by the Bank's Boards of Commissioners and Director actively monitor of the Bank's risk profile and its risk management implementation through meeting that are conducted regularly.

Other than policy and the above mentioned method, the Bank has continued developing its culture and support the implementation for operational risk. The three line of defense implementation, which consist of unit business as the first line of defense, establishment of operational risk management as second line of defense and coordination with Internal Audit (SKAI) as third line of defense.

Legal risk

Legal risk is the risk related to legal claims and/or weaknesses in the juridical aspect. Such weaknesses in legal aspect is caused, among others, by the lack of the supporting legislation or the weaknesses of contracts such as incomplete requirements for a valid contract and imperfect document contract.

As an entity which is governed by the laws of the Republic of Indonesia, the Bank should always comply with all such laws and regulations issued by the regulator in the banking industry in Indonesia. In addition, the Bank should also follow all prevailing rules and regulations in the society whether directly or indirectly related with the business activities conducted by the Bank. Failure by the Bank to comply with such prevailing laws and regulations may give rise to legal claims against the Bank. If legal claims against the Bank are material in amounts, then it may directly affect the Bank's financial performance.

Bank implements legal risk identification based on several factors include lawsuits, lack of rule or law that supports the regulation and the weakness of the agreement. The Bank performed legal risk control to ensure that all activities and working relationships with third parties have been based on the rules and requirements that can protect the Bank's interests from legal terms including the anticipation of potential demands from external parties.

50. INFORMASI TAMBAHAN (lanjutan)

Risiko hukum (lanjutan)

Untuk memitigasi risiko hukum yang mungkin timbul akibat tuntutan hukum atau kelemahan dari aspek hukum, Bank memiliki Biro Hukum. Biro tersebut memiliki peranan:

1) melakukan analisis hukum atas produk dan aktivitas baru serta membuat standar dokumen hukum yang terkait dengan produk dan aktivitas baru tersebut;
2) memberikan analisis/pendapat hukum;
3) memberikan pendapat atas eksposur hukum akibat perubahan ketentuan atau peraturan;
4) memeriksa segala perjanjian yang akan dibuat antara Bank dengan pihak ketiga; dan
5) melakukan pemeriksaan berkala atas perjanjian yang telah dibuat.

Dengan adanya biro tersebut, maka kebijakan hukum dan standar dokumen hukum yang terkait dengan produk atau fasilitas perbankan yang ditawarkan oleh Bank kepada masyarakat dimana kebijakan hukum dan standar dokumen hukum dimaksud dibuat dengan mengacu kepada ketentuan peraturan perundangan yang berlaku serta memperhatikan kepentingan aspek hukum dari Bank.

Selain itu, Biro Hukum juga memiliki bagian Litigasi untuk menangani setiap permasalahan hukum yang terkait dengan litigasi agar risiko hukum yang mungkin timbul dapat diminimalisir seminimum mungkin.

Pengelolaan risiko hukum dilakukan dengan memantau perkembangan kasus-kasus hukum yang terjadi dan mengambil pembelajaran dari kasus-kasus tersebut. Penanganan kasus hukum yang dilakukan pada Bank senantiasa memperhitungkan potensi kerugian.

Risiko reputasi

Risiko reputasi adalah risiko akibat menurunnya tingkat kepercayaan *stakeholder* yang bersumber dari persepsi negatif terhadap Bank. Risiko ini melekat dalam setiap kegiatan yang dilakukan oleh Bank. Kegagalan Bank dalam menjaga reputasinya di mata masyarakat dapat menimbulkan pandangan maupun persepsi negatif masyarakat terhadap Bank. Apabila risiko ini dihadapi oleh Bank, maka dalam waktu singkat dapat terjadi penurunan atau hilangnya kepercayaan nasabah terhadap Bank yang pada akhirnya akan memberikan dampak negatif terhadap pendapatan dan volume aktivitas Bank.

50. ADDITIONAL INFORMATION (continued)

Legal risk (continued)

To mitigate the possible legal risk caused by legal claims or weaknesses in legal aspects, the Bank has a General Legal Counsel Bureau. Such division has the following functions:

1) to provide legal analysis on new product and activity and prepare standard legal document related with such new product and activity;
2) to provide legal analysis/advice;
3) to provide advice on legal exposure due to change of laws or regulations;
4) to review any contracts between the Bank and third party; and
5) to conduct a periodical review on contracts which have been executed.

Based on the bureau above, legal policy and legal document standards related to the product or banking facilities offered by the Bank to public, whereby the legal policy and legal document standards are intentionally made in accordance with the prevailing laws and regulations also considering the interests in the legal aspect of the Bank.

In addition, the General Legal Counsel Bureau also has a Litigation division to handle every legal case related to litigation so that the possible legal risk can be minimised as minimum as possible.

The legal risk is also conducted by monitoring the development of legal cases and take lesson learnt principle from those cases. The management of legal cases conducted by the Bank is calculating potential loss at all time.

Reputation risk

Reputation risk is the risk related to the decreasing level of stakeholder's confidence arising from the negative perception on the Bank. Reputation risk is inherent in every activity conducted by the Bank. The Bank 's failure to protect its reputation in the public's eye may result in negative view as well as perception by the public towards the Bank. If the Bank faces this risk, then in the short run, the Bank may lose the customer's trust that will ultimately result in a negative impact to the Bank 's income and volume of activities.

50. INFORMASI TAMBAHAN (lanjutan)

Risiko reputasi (lanjutan)

Risiko reputasi dapat berdampak langsung pada berkurangnya kepercayaan nasabah sehingga jumlah nasabah ataupun pendapatan Bank menurun. Dalam mengelola risiko reputasi, Bank berupaya untuk menjaga reputasi dengan memberikan pelayanan terbaik dalam menangani keluhan dan memberikan kepuasan kepada nasabah untuk menghindari munculnya keluhan tersebut di media.

Corporate Secretary setiap hari melakukan pengawasan atas pemberitaan media untuk memantau publikasi negatif atau keluhan nasabah yang muncul di media. Sedangkan pengawasan atas keluhan nasabah yang disampaikan langsung ke Bank dilakukan oleh *Group Quality Service* untuk kemudian ditindaklanjuti penyelesaiannya.

Untuk pemberitaan negatif dan keluhan nasabah yang muncul di media selanjutnya dibuatkan klarifikasi dan tanggapan sesuai dengan langkah yang akan ditempuh Bank. Upaya mitigasi risiko reputasi juga dilakukan saat Bank meluncurkan produk/layanan/program baru dengan menganalisis risiko reputasi yang mungkin timbul dan bagaimana mengantisipasi risiko tersebut. Demikian pula, untuk informasi yang material atau yang penting untuk diketahui oleh nasabah, *Corporate Secretary* juga menyiapkan panduan untuk para *frontliner* dan *spokespersons* agar mereka bisa menjelaskan informasi tersebut secara benar dan proporsional kepada nasabah.

Risiko stratejik

Risiko stratejik adalah risiko akibat ketidaktepatan dalam pengambilan dan/atau penerapan suatu keputusan stratejik serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis. Ketidakmampuan Bank dalam melakukan penyusunan strategi yang tepat dapat menimbulkan kegagalan bisnis Bank di masa yang akan datang.

Risiko ini juga mencakup kemampuan Bank dalam meningkatkan daya saing dan menciptakan keunggulan kompetitif Bank di tengah kompetisi perbankan yang semakin ketat. Ketidakmampuan Bank dalam menghadapi tantangan bisnis yang terus mengalami perubahan dari waktu ke waktu akan mengakibatkan kegagalan bagi Bank untuk mencapai visi yang selama ini telah ditetapkan.

Bank mengelola risiko stratejik melalui proses pertimbangan dan pengambilan keputusan secara komprehensif dan kolektif di lingkungan komite-komite pengawasan dan eksekutif, yang turut mempengaruhi dan berdampak pada langkah-langkah bisnis yang akan diambil dalam kerangka kebijakan dan arah yang telah ditetapkan oleh Bank.

50. ADDITIONAL INFORMATION (continued)

Reputation risk (continued)

Reputational risks can have a direct impact on the decreasing of customer confidence as a result the number of customers or the Bank's income decreased. In managing reputation risk, the Bank seeks to maintain a reputation for providing the best service to handle complaints and provide satisfaction to customers to avoid the appearance of such complaints in media.

The Corporate Secretary performs a daily media monitoring of the news to observe negative publications or customer's complaints which appear in the media. The monitoring of customer's complaints which are submitted directly to the Bank is performed by the Group Quality Service for follow up action to resolve.

For negative news publication and customer's complaints which appear in the media, a clarification and appropriate response will be conducted in accordance with the steps undertaken by the Bank. Efforts to mitigate the reputation risk are also undertaken everytime when the Bank launches a new product/service/program by analysing the possibility of reputation risk that may arise and how to anticipate such risk. Moreover, for material or important information to be known by the customer, the Corporate Secretary also prepares guidelines for frontliners and spokespersons so that they are able to explain the information correctly and proportionately to customers.

Strategic risk

Strategic risk is the risk due to inaccuracy in deciding and/or implementing a strategic decision as well as the failure in anticipating the changes in the business environment. Failure in formulating the right strategy may deteriorate the Bank's business in the future.

This risk also includes the Bank's ability to develop its competitiveness and create a Bank's competitiveness edge amidst the stiff competition in the banking industry. The inability of Bank to cope with such business challenges which are constantly changing from time to time will lead Bank to failure to accomplished determined vision.

The Bank manages strategic risks through a comprehensive and collective consideration and decision-making processes encompassing areas of the supervisory and executive committee that influence and impact business decisions on policies and directions that the Bank will embark on.

50. INFORMASI TAMBAHAN (lanjutan)

Risiko kepatuhan

Risiko kepatuhan merupakan risiko akibat Bank tidak mematuhi dan/atau tidak melaksanakan peraturan perundang-undangan dan ketentuan yang berlaku. Dalam menjalankan kegiatan usaha pada industri Perbankan, Bank diwajibkan untuk selalu tunduk terhadap peraturan perbankan yang diterbitkan baik oleh Pemerintah, Bank Indonesia maupun Otoritas Jasa Keuangan (OJK).

Pada umumnya, risiko kepatuhan melekat pada Bank sebagai sebuah lembaga perbankan, seperti: risiko kredit terkait dengan ketentuan Kewajiban Penyediaan Modal Minimum (KPMM); Penilaian Kualitas Aset; Pembentukan Cadangan Kerugian Penurunan Nilai (CKPN); Batas Maksimum Pemberian Kredit (BMPK); penerapan tata kelola yang baik (*GCG*) dan risiko lain yang terkait dengan ketentuan tertentu termasuk peraturan OJK dan Bank Indonesia yang relevan. Ketidakmampuan Bank untuk mengikuti dan mematuhi seluruh peraturan perundangan yang terkait dengan kegiatan usaha Bank dapat berdampak terhadap kelangsungan usaha Bank.

Risiko kepatuhan dapat bersumber dari perilaku hukum, yaitu perilaku atau aktivitas Bank yang menyimpang atau melanggar dari ketentuan dan/atau peraturan perundang-undangan serta perilaku organisasi, yaitu perilaku atau aktivitas Bank yang menyimpang atau bertentangan dari standar yang berlaku secara umum.

Wujud penerapan manajemen risiko kepatuhan antara lain dengan mewujudkan terlaksananya budaya kepatuhan pada seluruh kegiatan usaha Bank di setiap jenjang organisasi, menilai dan mengevaluasi kecukupan, dan kesesuaian kebijakan, ketentuan, sistem maupun prosedur yang dimiliki oleh Bank dengan ketentuan dan peraturan yang berlaku, memantau atas pelaksanaan prinsip kehati-hatian Bank.

Bank melakukan identifikasi dan pengelolaan risiko kepatuhan sejak awal dengan memberikan bantuan kepada unit bisnis dan unit operasional dalam hal pengembangan produk dan aktivitas baru dan secara aktif melakukan penilaian terhadap kebijakan Pedoman dan Prosedur Internal yang dimiliki oleh Bank untuk memastikan bahwa seluruh peraturan eksternal telah diakomodir sedemikian rupa dan selanjutnya untuk dipatuhi dalam pelaksanaannya.

50. ADDITIONAL INFORMATION (continued)

Compliance risk

Compliance risk is the risks resulting from the failure of the Bank in fulfilling and/or implementing the prevailing laws and regulations. In engaging in the banking industry services, the Bank is required to always comply with the banking regulations issued by the Government, Central Bank and Financial Services Authority (OJK).

In general, the compliance risk is embedded in the Bank as a banking institution, such as: credit risks related to Capital Adequacy Ratio (CAR) regulations; Assessment of Assets Quality; Allowance for Impairment Losses (CKPN); Legal Lending Limit (LLL); Good Corporate Governance (GCG) and other risks related to certain regulations including OJK and Central Bank relevant regulations. The inability of the Bank to follow and comply with all laws and regulations related to the Bank's business activities may affect the continuity of the Bank's operation.

Compliance risk may arise from legal behavior, which is the Bank's behavior or activity that deviates from or violates the provisions and/or laws and regulations, as well as organizational behavior, which is the Bank's behavior or activity that deviates from or in contrary to the generally accepted standards.

The implementation of compliance risk management, among others, is by achieving the implementation of compliance culture at all of the Bank's business activities at every organizational level, assessing and evaluating the adequacy and conformity of the Bank's policies, regulations, systems, and procedures against the applicable provisions and regulations, monitoring the implementation of the Bank's prudential principles.

The Bank implements early detection and management of compliance risks by providing assistance to business and operational units and new product and new activity and also evaluated the Bank's Guidelines and Procedures to ensure that all external regulations have been accommodated and implemented correctly.

50. INFORMASI TAMBAHAN (lanjutan)

Batas Maksimum Penyaluran Kredit

Pada tanggal 26 Desember 2018, OJK mengeluarkan ketentuan baru yaitu No. 32/POJK.03/2018 tentang "Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar bagi Bank Umum" yang berlaku efektif sejak 1 September 2019 yang sebagian pasalnya diubah dengan POJK No. 38/POJK.03/2019 tanggal 19 Desember 2019. Peraturan tersebut menetapkan batas maksimum penyediaan dana kepada satu debitur dan/atau kelompok debitur yang bukan merupakan pihak berelasi tidak melebihi 25% dari modal inti Bank. Pada tanggal 31 Desember 2025 dan 2024 tidak terdapat pelampauan dan pelanggaran atas BMPK baik kepada pihak berelasi maupun pihak ketiga.

50. ADDITIONAL INFORMATION (continued)

Maximum Limit for Distribution of Loans

On December 26, 2018, OJK issued new regulation No. 32/POJK.03/2018 regarding "Legal Lending Limit and Large Exposure for Commercial Bank" which effective since September 1, 2019, which amended partially by POJK No. 38/POJK.03/2019 dated December 19, 2019. This regulation requires the maximum lending limit to one and/or group of nonrelated party debtor which not exceed to 25% of the Bank's core capital. As of December 31, 2025 and 2024, there were no breach and no violation of the LLL requirements both to related parties and third parties.

51. STANDAR AKUNTANSI YANG TELAH DITERBITKAN NAMUN BELUM BERLAKU EFEKTIF

Standar akuntansi yang telah diterbitkan sampai tanggal penerbitan laporan keuangan Bank namun belum berlaku efektif diungkapkan berikut ini. Manajemen bermaksud untuk menerapkan standar-standar tersebut yang dipertimbangkan relevan terhadap Bank pada saat efektif, dan dampaknya terhadap posisi dan kinerja keuangan Bank masih diestimasi pada tanggal 31 Desember 2025:

Mulai efektif pada atau setelah tanggal 1 Januari 2026

PSAK 109, "Instrumen Keuangan" dan PSAK 107, "Instrumen Keuangan: Pengungkapan", tentang "Klasifikasi dan Pengukuran Instrumen Keuangan"

Amendemen ini menambahkan dan mengklarifikasi ketentuan dalam PSAK 109 terkait penghentian pengakuan liabilitas keuangan, serta mengklarifikasi penilaian karakteristik arus kas untuk aset keuangan dengan fitur *ESG-linked*, aset keuangan dengan fitur *non-recourse*, dan instrumen yang terikat secara kontraktual seperti *tranche*. Amendemen ini juga mengubah ketentuan dalam PSAK 107 terkait persyaratan pengungkapan investasi pada instrumen ekuitas yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan menambah

Amandemen berlaku secara retrospektif untuk periode pelaporan tahunan yang dimulai pada atau setelah 1 Januari 2026. Penerapan dini diperkenankan. Perusahaan saat ini sedang menilai dampak dari amandemen tersebut untuk menentukan dampaknya terhadap pelaporan keuangan Perusahaan.

51. ACCOUNTING STANDARDS ISSUED BUT NOT YET EFFECTIVE

The accounting standards that have been issued up to the date of issuance of the Bank's financial statements, but not yet effective are disclosed below. The management intends to adopt these standards that are considered relevant to the Bank when they become effective, and the impact to the financial position and performance of the Bank is still being estimated as of December 31, 2025:

Effective beginning on or after January 1, 2026

SFAS 109, "Financial Instruments," and SFAS 107, "Financial Instruments: Disclosures", about the "Classification and Measurement of Financial Instruments"

These amendments adding and clarify statement in SFAS 109 regarding derecognition of financial liabilities, as well as clarify the assessment of cash flow characteristics for financial assets with ESG-linked features, financial assets with non-recourse features, and contractually bound instruments such as tranches. The amendments also revise the statement in SFAS 107 regarding the disclosure requirements for investments in equity instruments measured at fair value through other comprehensive income and adding statament

The amendment applies retrospectively to annual reporting periods beginning on or after January 1, 2026. Earlier application is permitted. The Company is currently assessing the impact of the amendment to determine the impact they will have on the Company's financial reporting.

51. STANDAR AKUNTANSI YANG TELAH DITERBITKAN NAMUN BELUM BERLAKU EFEKTIF (lanjutan)

Mulai efektif pada atau setelah tanggal 1 Januari 2027

PSAK 118, "Penyajian dan Pengungkapan dalam Laporan Keuangan"

Amendemen ini menggantikan PSAK 201 “Penyajian Laporan Keuangan” yang menyebabkan perubahan pada struktur penyajian laporan laba rugi dimana mensyaratkan penyajian subtotal laba/(rugi) operasi, laba/(rugi) sebelum pendanaan dan pajak penghasilan, serta laba/(rugi). Selanjutnya, penghasilan dan beban untuk diklasifikasikan ke dalam kategori operasi, investasi, dan pendanaan, serta pajak penghasilan dan operasi yang dihentikan. Selain itu, amandemen ini juga mengatur mengenai pengungkapan ukuran kinerja tetapan manajemen (UKTM) dengan tujuan mengomunikasikan pandangan manajemen atas aspek kinerja keuangan perusahaan secara keseluruhan.

51. ACCOUNTING STANDARDS ISSUED BUT NOT YET EFFECTIVE (continued)

Effective beginning on or after January 1, 2027

SFAS 118, "Presentation and Disclosure in Financial Statements”

These amendments will replace SFAS 201 “Presentation in Financial Statements” resulting in changes to the presentation structure of the income statement, requiring the presentation of subtotal profit/(loss) from operations, profit/(loss) before financing and income tax, as well as profit/(loss). Moreover, income and expenses to be classified into operating, investing and financing categories, as well as income tax and discontinued operations. In addition, this amandements also regulates the disclosure of management-defined performance measures (MPMs) with the aim of communicating management’s views on the overall financial performance of the company.

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2025

Laporan Tahunan dan Keberlanjutan
Annual and Sustainability Report