BNC bank neo commerce | neobank



Disciplined Growth, Elevated Value

2025

LAPORAN TAHUNAN DAN KEBERLANJUTAN

ANNUAL AND SUSTAINABILITY REPORT

Tentang Laporan Tahunan 2025

About Annual Report 2025

Laporan Tahunan PT Bank Neo Commerce Tbk untuk tahun buku 2025 disusun dengan mengusung tema *Disciplined Growth, Elevated Value*. Pemilihan tema ini didasarkan pada hasil evaluasi yang komprehensif terhadap dinamika bisnis sepanjang tahun 2025, sekaligus mempertimbangkan arah dan kesinambungan strategi Perseroan di masa mendatang. Penerbitan Laporan Tahunan ini merupakan wujud komitmen Perseroan dalam memperkuat transparansi dan keterbukaan informasi kepada pemegang saham, pemangku kepentingan, serta otoritas terkait. Dokumen ini dirancang sebagai sumber informasi yang menyeluruh, memuat gambaran kinerja, capaian, serta perkembangan operasional PT Bank Neo Commerce Tbk selama satu periode pelaporan.

Dalam laporan ini, istilah "Rupiah" atau IDR mengacu pada mata uang resmi Republik Indonesia, sedangkan "Dolar AS" atau USD merujuk pada mata uang resmi Amerika Serikat. Seluruh informasi keuangan disajikan dalam mata uang Rupiah dan disusun sesuai dengan Standar Akuntansi Keuangan yang berlaku di Indonesia. Penyebutan istilah "BNC", "Bank Neo Commerce", dan "Perseroan" dalam laporan ini merujuk pada PT Bank Neo Commerce Tbk sebagai entitas yang menjalankan kegiatan usaha di bidang perbankan. Untuk memudahkan pembacaan, istilah "Bank" juga digunakan sebagai penyebutan umum terhadap PT Bank Neo Commerce Tbk.

The Annual Report of PT Bank Neo Commerce Tbk for the fiscal year 2025 was prepared under the theme Discipline Growth, Elevated Value. This theme was selected based on a comprehensive evaluation of business dynamics throughout 2025, while also considering the direction and continuity of the Company's future strategies. The publication of this Annual Report reflects the Company's commitment to enhance transparency and disclosure of information to shareholders, stakeholders, and relevant authorities. This document is designed as a comprehensive source of information, providing an overview of the performance, achievements, and operational developments of PT Bank Neo Commerce Tbk during the reporting period.

In this report, the term "Rupiah" or IDR refers to the official currency of the Republic of Indonesia, while "U.S. Dollar" or USD refers to the official currency of the United States. All financial information is presented in Rupiah and prepared in accordance with the Financial Accounting Standards applicable in Indonesia. The terms "BNC," "Bank Neo Commerce," and "the Company" in this report refer to PT Bank Neo Commerce Tbk as an entity engaged in banking operations. For the sake of convenience, the term "the Bank" is also used as a general reference to PT Bank Neo Commerce Tbk.

Sanggahan dan Batasan Tanggung Jawab

Disclaimer and Limitation of Liability

Laporan Tahunan ini memuat berbagai pernyataan yang mencerminkan kondisi keuangan, kinerja operasional, rencana kerja, strategi, kebijakan, serta tujuan PT Bank Neo Commerce Tbk. Pernyataan-pernyataan tersebut dikategorikan sebagai pernyataan berwawasan ke depan sesuai dengan ketentuan peraturan perundang-undangan yang berlaku, kecuali informasi yang bersifat historis.

Pernyataan berwawasan ke depan secara inheren mengandung risiko dan ketidakpastian yang dapat menyebabkan hasil aktual berbeda secara signifikan dari yang diungkapkan dalam laporan ini. Seluruh pernyataan tersebut disusun berdasarkan sejumlah asumsi terkait kondisi terkini maupun proyeksi kondisi di masa depan, termasuk lingkungan bisnis tempat Perseroan menjalankan kegiatan usahanya.

Oleh karena itu, informasi yang disajikan dalam Laporan Tahunan ini tidak dapat dianggap sebagai jaminan atas kinerja Perseroan di masa yang akan datang. Realisasi hasil di periode mendatang dapat dipengaruhi oleh berbagai faktor eksternal yang berada di luar kendali PT Bank Neo Commerce Tbk.

This Annual Report contains various statements that reflect the financial condition, operational performance, work plans, strategies, policies, and objectives of PT Bank Neo Commerce Tbk. These statements are categorized as forward-looking statements as per the applicable laws and regulations, except for historical information.

These forward-looking statements inherently contain risks and uncertainties that may cause actual results to differ significantly from those disclosed in this report. All of these statements are based on a number of assumptions regarding current conditions and projections of future conditions, including the business environment in which the Company operates.

Therefore, the information presented in this Annual Report cannot guarantee the Company's future performance. The realization of results in future periods may be influenced by various external factors beyond the control of PT Bank Neo Commerce Tbk.

Sekapur Sirih
Preface

Disciplined Growth, Elevated Value



Seiring dengan transformasi Perseroan menuju bank berbasis layanan digital, Bank Neo Commerce (BNC) secara konsisten mengembangkan model *open ecosystem* sebagai fondasi utama dalam memperluas inklusi dan meningkatkan literasi keuangan masyarakat Indonesia. Upaya ini dilakukan melalui penguatan ekosistem digital yang berkelanjutan dengan menjalin sinergi serta kolaborasi strategis bersama berbagai mitra.

Pendekatan kolaboratif tersebut bertujuan untuk memperluas akses terhadap layanan keuangan, sehingga semakin banyak individu dan pelaku usaha dapat terhubung dengan solusi perbankan yang disediakan oleh BNC. Melalui integrasi kekuatan antara Perseroan dan para mitra strategisnya, BNC optimistis dapat menciptakan pertumbuhan usaha yang berkesinambungan, selaras dengan kepentingan nasabah dan mitra kerja dalam jangka panjang.

In line with the Company's transformationinto a bank with digital services, Bank Neo Commerce (BNC) consistently develops an open ecosystem model as the primary foundation in the expansion of financial inclusion and literacy among Indonesian citizens. These efforts are realized through the reinforcement of a sustainable digital ecosystem by fostering synergies and strategic collaborations with various partners.

This collaborative approach aims to expand access to financial services, enabling more individuals and businesses to connect with the banking solutions provided by BNC. By integrating the Company's strengths and its strategic partners, BNC is optimistic about creating sustainable business growth that aligns with the long-term interests of its customers and partners.

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Kilas Kinerja

Performance Highlight


neobanl
bank neo commerc

Ikhtisar Data Keuangan Penting
Key Financial Highlights

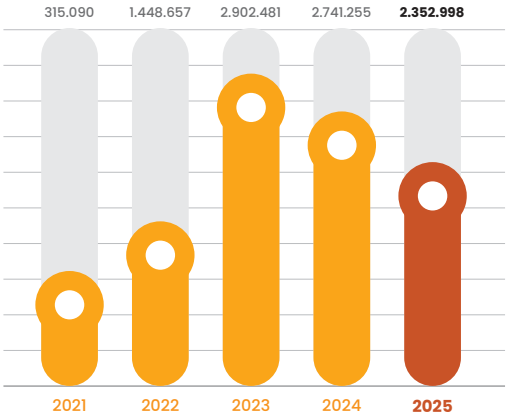
Laporan Laba (Rugi) dan Penghasilan Komprehensif Lain
Statements of Profit or (Loss) and Other Comprehensive Income

dalam jutaan Rupiah | in million Rupiah

Uraian Description	2025	2024	2023	2022	2021
Pendapatan Bunga Interest Income	3.145.192	3.612.292	3.847.049	2.161.809	665.651
Beban Bunga Interest Expense	(792.194)	(871.037)	(944.568)	(713.152)	(350.561)
Pendapatan Bunga Bersih Net Interest Income	2.352.998	2.741.255	2.902.481	1.448.657	315.090
Pendapatan Operasional Lainnya Other Operating Income	410.137	580.932	637.286	455.237	128.902
Beban Operasional Operating Expenses	(2.200.700)	(3.293.732)	(4.114.681)	(2.688.896)	(1.429.278)
Laba/(Rugi) Operasional Profit/(Loss) from Operations	562.435	28.455	(574.914)	(785.002)	(985.286)
Pendapatan/(Beban) Non-Operasional, bersih Non-Operating Income/ (Expenses), net	1.740	(9.771)	1.042	(940)	(5.134)
Laba/(Rugi) Sebelum Pajak Penghasilan Profit/(Loss) Before Income Tax	564.175	18.684	(573.872)	(785.942)	(990.420)
Manfaat/(Beban) Pajak Penghasilan Income Tax Benefit/ (Expenses)	1.515	1.201	692	(3.117)	4.131
Laba/(Rugi) Bersih Tahun Berjalan Net Profit/(Loss) for the Current Year	565.690	19.885	(573.180)	(789.059)	(986.289)
Penghasilan/(Rugi) Komprehensif Lain, Bersih Setelah Pajak Other Comprehensive Income/ (Loss), Net After Tax	103.067	(51.208)	57.285	(55.851)	4.049
Jumlah Penghasilan/ (Rugi) Komprehensif Tahun Berjalan Total Comprehensive Income/(Loss) for The Current Year	668.757	(31.323)	(515.895)	(844.910)	(982.240)
Laba/(Rugi) Per Saham (dalam nilai penuh) Profit/(Loss) per Share (in full amount)	42,37	1,58	(47,61)	(83,75)	(114,07)

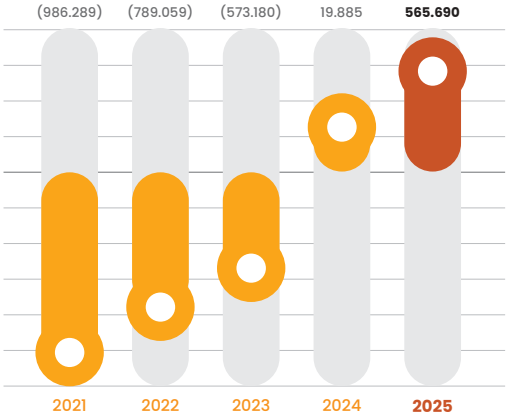
Pendapatan Bunga Bersih
Net Interest Income

(Rp juta)
(IDR million)



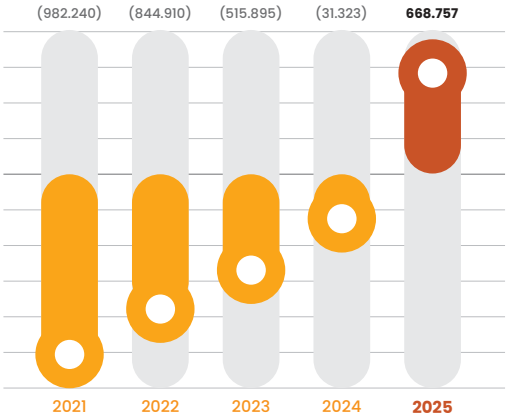
Laba/(Rugi) Bersih Tahun Berjalan
Net Profit/(Loss) for the Current Year

(Rp juta)
(IDR million)



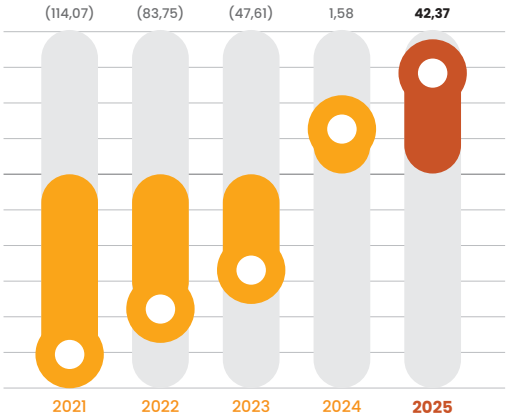
Jumlah (Rugi)/Laba Komprehensif
Comprehensive (Loss)/Income

(Rp juta)
(IDR million)



Laba/(Rugi)Per Saham
Profit/(Loss) per Share

(Dalam nilai penuh)
(In full amount)





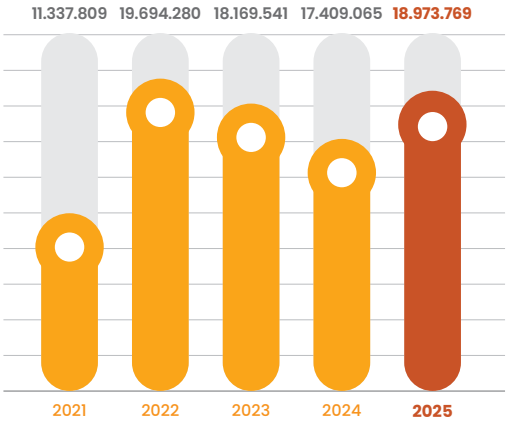
Laporan Posisi Keuangan
Statements of Financial Position

dalam jutaan Rupiah | in million Rupiah

Description	2025	2024	2023	2022	2021
Aset Assets					
Aset Produktif Productive Assets	17.320.333	15.707.219	16.310.624	17.199.281	9.769.337
Kredit yang Diberikan – Bruto Loans - Gross	7.182.580	8.822.146	10.783.341	10.244.251	4.275.500
Aset Tresuri Treasury Assets	10.136.069	6.797.176	5.415.554	6.698.884	5.179.383
Jumlah Aset Total Assets	18.973.769	17.409.065	18.169.541	19.694.280	11.337.809
Liabilitas & Ekuitas Liabilities & Equity					
Simpanan Nasabah Deposits from Customers	14.026.142	13.063.792	13.872.270	14.450.498	8.124.417
Giro Current Accounts	667.381	514.834	649.780	1.094.324	684.822
Tabungan Savings	3.501.410	3.095.982	3.344.831	3.034.198	942.670
Deposito Berjangka dan Deposito On Call Time Deposit and Deposit On Call	9.857.351	9.452.976	9.877.659	10.321.976	6.496.925
Simpanan dari Bank Lain Deposits from Other Banks	71.891	129.079	24.912	287.665	40.030
Jumlah Liabilitas Total Liabilities	14.743.043	13.847.228	14.846.502	15.949.690	8.447.982
Jumlah Ekuitas Total Equity	4.230.726	3.561.837	3.323.039	3.744.590	2.889.827
Jumlah Liabilitas dan Ekuitas Total Liabilities and Equity	18.973.769	17.409.065	18.169.541	19.694.280	11.337.809

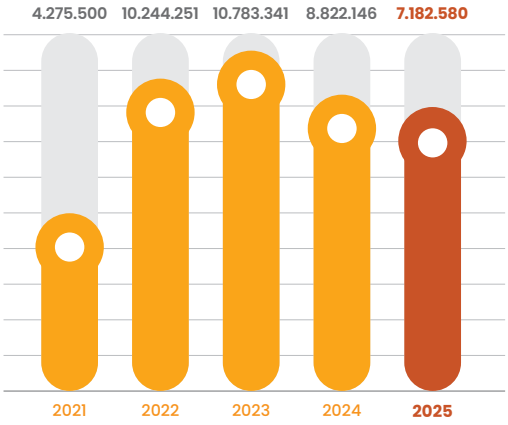
Jumlah Aset
Total Assets

(Rp juta)
(IDR million)



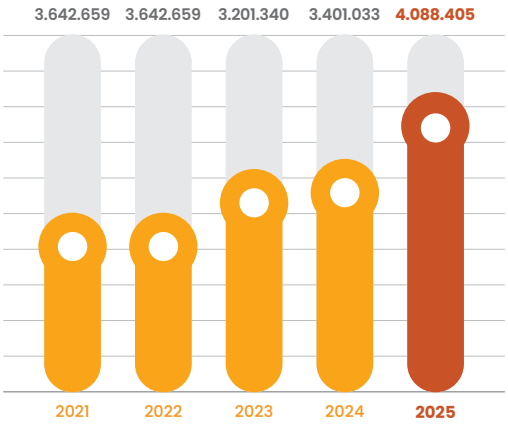
Kredit yang Diberikan
Loans

(Rp juta)
(IDR million)



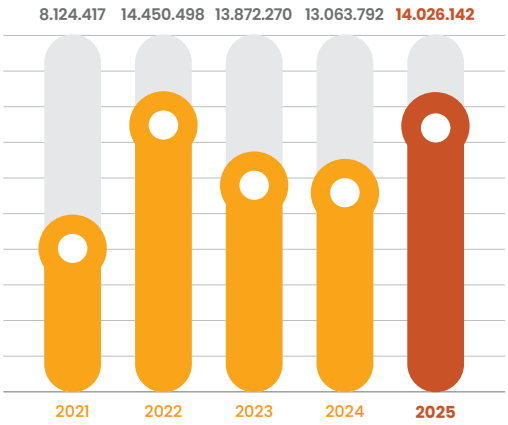
Modal
Capital

(Rp juta)
(IDR million)



Dana Pihak Ketiga
Third Party Funds

(Rp juta)
(IDR million)





Laporan Arus Kas
Statements of Cash Flows

dalam jutaan Rupiah | in million Rupiah

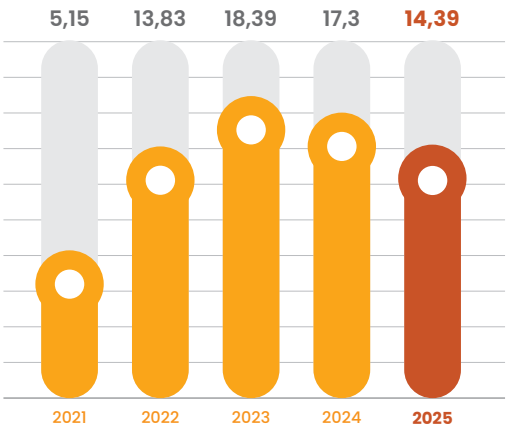
Uraian Description	2025	2024	2023	2022	2021
Arus Kas Bersih yang Diperoleh dari/ (Digunakan untuk) Aktivitas Operasi Net Cash Flows Provided by/(Used in) Operating Activities	4.392.183	120.567	(2.173.945)	3.137.478	371.225
Arus Kas Bersih yang (Digunakan untuk)/ Diperoleh dari Aktivitas Investasi Net Cash Flows (Used in)/Provided by Investing Activities	(2.805.455)	(1.424.434)	116.583	(2.610.747)	(1.052.978)
Arus Kas Bersih yang (Digunakan untuk)/ Diperoleh dari Aktivitas Pendanaan Net Cash Flows (Used in)/Provided by Financing Activities	(37.560)	224.062	70.450	1.665.458	2.730.348
Kenaikan/(Penurunan) Bersih Kas dan Setara Kas Net Increase/(Decrease) in Cash and Cash Equivalents	1.549.168	(1.079.805)	(1.986.912)	2.192.189	2.048.595
Kas dan Setara Kas Awal Tahun Cash and Cash Equivalents at Beginning of the Year	1.523.144	2.602.949	4.589.861	2.397.672	349.077
Kas dan Setara Kas Akhir Tahun Cash and Cash Equivalents at End of the Year	3.072.312	1.523.144	2.602.949	4.589.861	2.397.672

Rasio-Rasio Keuangan
Financial Ratio

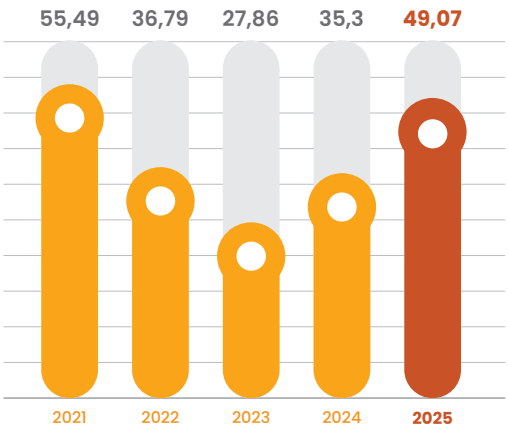
dalam % | in %

Uraian Description	2025	2024	2023	2022	2021
Imbal Hasil terhadap Aset (ROA) Return on Assets (ROA)	3,11	0,10	(2,99)	(5,2)	(13,71)
Imbal Hasil terhadap Ekuitas (ROE) Return on Equity (ROE)	15,13	0,59	(17,56)	(32,67)	(84,61)
Marjin Pendapatan Bunga Bersih (NIM) Net Interest Margin (NIM)	14,39	17,3	18,39	13,83	5,15
Rasio Kecukupan Modal (KPMM) Minimum Capital Adequacy Ratio (CAR)	49,07	35,3	27,86	36,79	55,49
Rasio Kredit Bermasalah - Bruto Non Performing Loan (NPL) - Gross	3,58	3,30	3,73	2,56	1,75
Rasio Kredit Bermasalah - Neto Non-Performing Loan (NPL) – Net	0,89	0,30	0,95	2,05	1,19
Biaya Operasional terhadap Pendapatan Operasional (BOPO) Operating Expenses to Operating Income (BOPO)	84,18	99,34	112,27	127,28	224,01
Kredit yang Diberikan kepada Simpanan Nasabah (LFR) Loan to Funding Ratio (LFR)	55,62	69,20	79,94	73,21	56,73
Giro Wajib Minimum (GWM) Rupiah Minimum Regulatory Reserve Requirement (GWM) Rupiah	8,62	6,14	8,60	7,98	3,53
Rasio Liabilitas terhadap Ekuitas (DER) Debt to Equity Ratio (DER)	348,48	388,77	446,77	425,94	292,34
Rasio Liabilitas terhadap Aset (DAR) Debt to Assets Ratio (DAR)	77,70	79,54	81,71	80,99	74,51

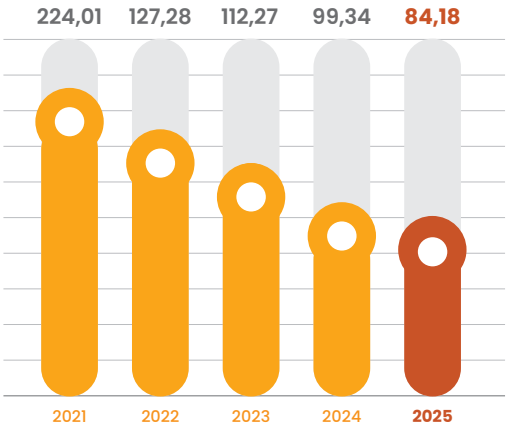
NIM
NIM
%



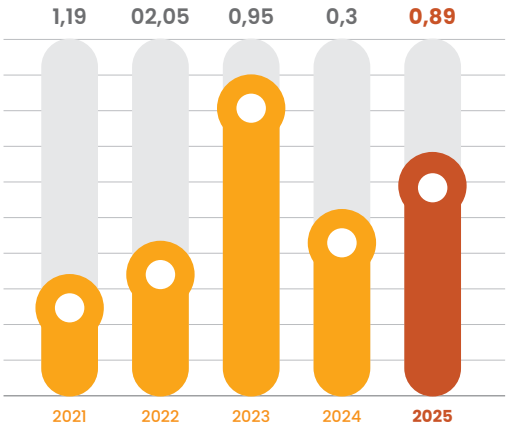
KPMM
KPMM
%



Biaya Operasional terhadap Pendapatan Operasional (BOPO)
Operating Expenses to Operating Income (BOPO)
%



NPL-Neto
Non Performing Loan (NPL) - Netto
%





Ikhtisar Operasional
Operational Highlights

	2025	2024	2023	2022	2021
Jumlah Karyawan Total Employees	933	1.208	998	1.016	641
Jumlah Kantor Total Office Channeling	11	13	14	21	21
Jumlah ATM Total ATM	8	9	10	21	11

Ikhtisar Saham
Stock Highlights

Kinerja Saham | Stock Performance

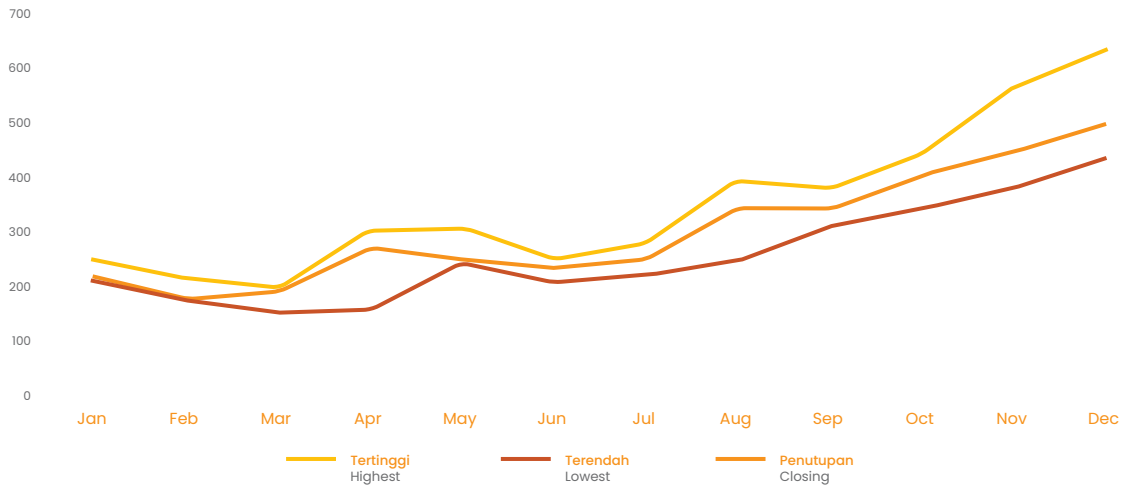
Kode Saham Stock Code	**BBYB**
Bursa Perdagangan Saham Stock Exchange	Bursa Efek Indonesia (BEI) Indonesia Stock Exchange (IDX)
Tanggal Pencatatan Listing Date	13 Januari 2015 January 13, 2015
Harga IPO IPO Price	Rp155

2025	Harga Saham Peredaran Saham Share Price Share Circulation (Rp/IDR)						Jumlah Saham Beredar Outstanding Shares	Kapitalisasi Pasar Market Capitalization
	Tertinggi Highest	Terendah Lowest	Penutupan Closing	Volume (Unit)	Nilai Value	Frekuensi Frequency		
Q1	236	148	184	1.033.812.300	204.576.276.700	90.919	13.350.482.346	2.456.488.751.664
Q2	296	153	224	2.462.824.700	600.755.819.800	138.211	13.350.482.346	2.990.508.045.504
Q3	382	214	332	6.035.007.800	1.941.417.007.400	327.727	13.350.482.346	4.432.360.138.872
Q4	615	332	480	14.400.925.300	6.542.506.189.100	1.060.233	13.350.482.346	6.408.231.526.080

	Share Price Share Circulation (Rp/IDR)						Outstanding Shares	Capitalization
	Highest	Lowest	Closing	(Unit)	Value	Frequency		
Q1	480	210	278	5.231.676.700	1.705.112.833.200	419.069	12.038.815.679	3.346.790.758.762
Q2	296	216	246	2.277.094.700	590.079.863.800	172.398	12.038.815.679	2.961.548.657.034
Q3	336	224	284	4.425.618.600	1.245.218.696.800	311.599	13.350.482.346	3.791.536.986.264
Q4	300	210	218	2.301.078.500	601.434.670.400	149.521	13.350.482.346	2.910.405.151.428

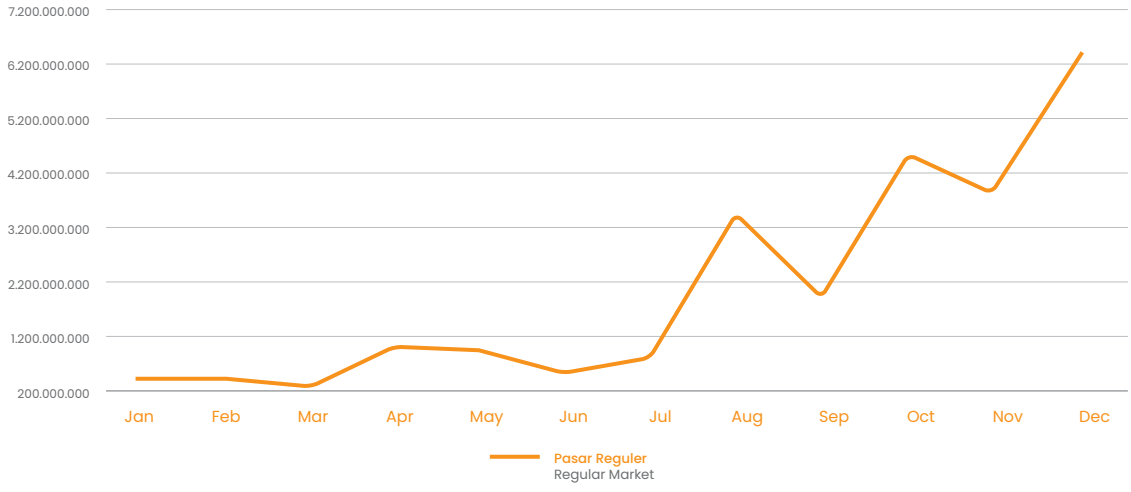
Pergerakan Harga Saham Tahun 2025
Stock Price Movement in 2025

dalam Rupiah (satuan penuh)
in Rupiah (full amount)



Volume Perdagangan 2025
2025 Trading Volume

Unit
Units



Informasi Penghentian Sementara Perdagangan Saham *(Suspension)* dan/atau Sanksi Perdagangan Saham *(Delisting)*

Sepanjang tahun 2025, Perseroan menjalankan aktivitas perdagangannya di pasar modal tanpa mengalami penghentian sementara perdagangan saham (*suspension*) maupun sanksi penghapusan pencatatan saham (*delisting*). Dengan demikian, tidak terdapat kejadian terkait *suspension* dan/atau *delisting* yang perlu diungkapkan dalam Laporan Tahunan ini.

Information on Temporary Suspension of Stock Trading and/or Delisting

Throughout 2025, the Company conducted its trading activities in the capital market without experiencing any temporary suspension of stock trading or delisting. Therefore, there were no events related to suspension and/or delisting that need to be disclosed in this Annual Report.

Informasi tentang Aksi Korporasi

Sepanjang tahun 2025, Perseroan tidak melakukan pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), pembagian dividen saham, saham bonus, perubahan nilai nominal saham, penerbitan efek konversi, penambahan modal atau pengurangan modal.

Information on Corporate Action

Throughout 2025, the Company did not carry out any stock splits, reverse stock splits, stock dividends, bonus shares distribution, changes in par value of shares, issuance of convertible securities, capital increases, or capital reductions.

Ikhtisar Obligasi, Sukuk, dan/atau Obligasi Konversi

Sampai dengan akhir tahun 2025, Perseroan tidak memiliki instrumen pendanaan berupa obligasi, sukuk, maupun obligasi konversi yang beredar. Oleh karena itu, tidak terdapat informasi terkait instrumen-instrumen tersebut yang perlu disampaikan dalam Laporan Tahunan ini.

Overview of Bonds, Sukuk, and/or Convertible Bonds

As of the end of 2025, the Company had no issuance of financing instruments in the form of bonds, sukuk, or convertible bonds. Therefore, there is no information regarding such instruments that needs to be disclosed in this Annual Report.

Informasi Sumber Pendanaan Lainnya

Selama tahun 2025, Perseroan tidak menerbitkan surat berharga sebagai sumber pendanaan lainnya, termasuk dalam bentuk obligasi, *medium term notes* (MTN), maupun Negotiable *Certificate of Deposit* (NCD). Dengan demikian, tidak terdapat informasi tambahan mengenai sumber pendanaan tersebut yang dapat diungkapkan dalam Laporan Tahunan ini.

Information on Other Sources of Funding

During 2025, the Company did not issue any securities as other sources of funding, including bonds, medium-term notes (MTN), or Negotiable Certificates of Deposit (NCD). Consequently, there is no additional information regarding these funding sources to be disclosed in this Annual Report.

Kilas Peristiwa 2025

2025 Event Highlights

2025
9 Januari
January, 9



Bank Neo Commerce 35th Anniversary
Bank Neo Commerce 35th Anniversary

Genap 35 tahun di tahun 2025, Perseroan hadir menemani perjalanan perbankan dan keuangan masyarakat Indonesia. Perseroan terus berkomitmen untuk menyediakan layanan keuangan yang lengkap, memberikan solusi bagi kebutuhan finansial seluruh masyarakat Indonesia. Perseroan senantiasa berupaya menghadirkan pengalaman perbankan yang menyenangkan dengan berbagai inovasi tiada henti yang kami berikan. Mari terus bergandengan tangan, bersama kita wujudkan inklusivitas keuangan yang menyeluruh dan membuka peluang lebih besar bagi setiap individu di Indonesia.

Marking its 35th anniversary in 2025, the Company stands ready to accompany Indonesians on their banking and financial journey. The Company remains committed to providing comprehensive financial services and solutions for the financial needs of all Indonesians. We constantly strive to deliver a pleasant banking experience through our continuous innovations. Let's continue to work hand in hand; together, we will realize comprehensive financial inclusion and open up greater opportunities for every individual in Indonesia.

2025
11 Februari
February, 11



Media Group Interview
Media Group Interview

Perseroan menggelar Media Group Interview yang mengundang berbagai media nasional untuk berdiskusi bersama dan bertanya langsung dengan Direktur Bisnis BNC, Bapak Aditya Windarwo yang ditemani oleh Chief Financial Officer, Ibu Sufen Triantio, di Kantor Pusat Perseroan, Jakarta. Dalam kesempatan ini, Perseroan membagikan proyeksi bisnis tahun 2025 dan *highlight* kinerja tahun buku 2024.

The Company held a Media Group Interview, inviting various national media outlets to engage in a discussion and ask questions directly to BNC's Business Director, Mr. Aditya Windarwo, who was accompanied by Chief Financial Officer, Ms. Sufen Triantio, at the Company's Head Office in Jakarta. During the event, the Company shared its business projections for 2025 and provided a preview of key performance highlights for the 2024 fiscal year.

2025
15 Februari
February, 15



NeoMeet Edu Finance
NeoMeet Edu Finance

Perseroan menggelar Neo Meet Edu Finance bertajuk "Amati Tren, Jalankan Strategi. Raih Untung Lebih Banyak" bersama Kang Aang Permana, Founder Sipetek Food & Mentor UMKM, yang dihadiri oleh para pemilik UMKM yang tergabung dalam neobank Community. Secara berkelanjutan, Perseroan fokus memberikan edukasi keuangan kepada masyarakat, yang salah satunya adalah mengadakan pembekalan materi dan mini workshop semacam ini terkait pengembangan bisnis yang mereka jalankan.

The Company hosted Neo Meet Edu Finance event titled "Monitor Trends, Execute Strategies. Earn More Profit" with Kang Aang Permana, Founder of Sipetek Food & MSME Mentor, which was attended by MSME owners who are members of the neobank Community. The Company remains committed to providing financial education to the public, one of which is by organizing training sessions and mini-workshops related to the development of their businesses.

2025
21 Maret
March, 21



Webinar Pondasi Investasi
Webinar Pondasi Investasi

Bank Neo Commerce melalui beragam program yang dimilikinya, salah satunya yaitu Webinar Pondasi Investasi ini kerap membagikan informasi serta edukasi terkait keuangan yang dapat diterapkan langsung oleh nasabah dan masyarakat secara umum.

Through its various programs, one of which is the "Pondasi Investasi" webinar, Bank Neo Commerce frequently shares financial information and educational resources that can be directly applied by customers and the general public.

2025
10 April
April, 10



Bank Neo Commerce Town Hall & Halal Bihalal

Perseroan menggelar Halal Bihalal & Town Hall 2025 yang dihadiri oleh seluruh Neobankers secara hybrid. Selain dalam rangka silaturahmi dan saling bermaafan setelah Hari Raya Idulfitri 1446 H, acara ini dilaksanakan untuk memberikan informasi terkini mengenai Perseroan kepada para Neobankers, baik dari sisi korporasi maupun bisnis. Mengusung tema "Kebersamaan Menguatkan, Kolaborasi Mewujudkan", Halal Bihalal dan Town Hall ini merupakan wadah yang tepat untuk semakin mempererat jalinan silaturahmi untuk meningkatkan kualitas kerja dan kolaborasi para Neobankers.

The Company held Halal Bihalal & Town Hall 2025, attended by all Neobankers in a hybrid format. Besides fostering camaraderie and exchanging forgiveness following Eid al-Fitr 1446 H, this event was organized to provide Neobankers with the latest updates on the Company, covering both corporate and business aspects. Under the theme "Togetherness Empowers, Collaboration Achieves," this Halal Bihalal and Town Hall serves as the perfect platform to further strengthen bonds of friendship and enhance the quality of work and collaboration among Neobankers.

2025
6 & 26 Mei
May, 6 & 26





Seremoni Penandatanganan Kerjasama antara Bank Neo Commerce dengan Kredi360 dan Bank Neo Commerce dengan MNC Asset Management

Signing Ceremony of Cooperation between Bank Neo Commerce and Kredi360, also Bank Neo Commerce and MNC Asset Management

Melalui kolaborasi, Perseroan berkomitmen untuk semakin memperluas ekosistem dalam memberikan pelayanan prima kepada masyarakat. Hal ini dibuktikan dengan diadakannya signing ceremony kerja sama antara Perseroan dengan berbagai mitra strategis, diantaranya yaitu Kredi360 pada 6 Mei 2025 dan MNC Asset Management pada 26 Mei 2025.

Through collaboration, the Company is committed to further expanding its ecosystem to provide excellent service to the public. This is proven by the signing ceremonies held between the Company and various strategic partners, including Kredi360 on May 6, 2025, and MNC Asset Management on May 26, 2025.

2025
27 Mei
May, 27





Rapat Umum Pemegang Saham Tahunan dan Luar Biasa

Annual and Extraordinary General Meeting of Shareholders

Perseroan telah menyelenggarakan Rapat Umum Pemegang Saham Tahunan (RUPST). Rapat membahas beberapa agenda dan dihadiri oleh mayoritas pemegang saham Perseroan serta manajemen perusahaan, yaitu jajaran Dewan Komisaris dan Direksi Perseroan. Dalam RUPST kali ini, pemegang saham menyetujui usulan perubahan atas rencana penggunaan dana hasil Penawaran Umum Terbatas V (PUT V) dengan Hak Memesan Efek Terlebih Dahulu dan Penawaran Umum Terbatas VI (PUT VI) dengan Hak Memesan Efek Terlebih Dahulu atau right issue. Perubahan ini diselaraskan dengan Rencana Bisnis Perseroan yang berfokus dalam peningkatan bisnis khususnya dalam penyaluran kredit.

The Company has held its Annual General Meeting of Shareholders (AGMS). The meeting discussed several agenda and was attended by a majority of the Company's shareholders as well as company management, including the Board of Commissioners and the Board of Directors. At this AGMS, shareholders approved the proposed changes to the plan for the use of proceeds from Limited Public Offering V (PUT V) with Preemptive Rights and Limited Public Offering VI (PUT VI) with Preemptive Rights or rights issue. These changes are aligned with the Company's Business Plan, which focuses on business growth, particularly in credit distribution.

2025
17 & 19 Juni
June, 17 & 19





Bank Neo Commerce – TV Live Show (Beritasatu & CNBC TV)

Direktur Bisnis BNC, Bapak Aditya Windarwo hadir dalam program Corporate Insight (17/06) di BeritaSatu TV menyampaikan strategi Perseroan dalam menjalankan operasional bisnis perbankan digital yang memberikan dampak positif bagi pertumbuhan kinerja Perseroan.

Pada kesempatan berbeda, Direktur Utama BNC, Eri Budiono menyebutkan Dalam program Money Talks (19/06) CNBC Indonesia TV terkait kinerja impresif Perseroan dalam upaya memperbaiki kualitas portofolio pinjaman hingga mampu menekan NPL serta berhasil mencetak kenaikan laba.

BNC's Business Director, Mr. Aditya Windarwo, appeared on the Corporate Insight program (June 17) on BeritaSatu TV to discuss the Company's strategy in running its digital banking operations, which has positively impacted the Company's performance growth.

On a separate occasion, BNC's President Director, Eri Budiono spoke on the Money Talks program (June 19) on CNBC Indonesia TV regarding the Company's impressive performance in its efforts to improve the quality of its loan portfolio, thereby reducing NPLs and successfully increasing profits.

2025
22 Juni
June, 22



Webinar NeoTalks – Literasi Keuangan Bank Neo Commerce x Komunitas Kumpulbaca

NeoTalks Webinar – Financial Literacy, Bank Neo Commerce x Kumpulbaca Community

Perseroan menggelar kegiatan literasi keuangan dalam bentuk Webinar, berkolaborasi dengan Komunitas Kumpulbaca, dan membahas fenomena *self-reward* yang marak dilakukan oleh generasi muda. Perseroan aktif menggelar kegiatan edukasi guna mendukung pertumbuhan positif tingkat literasi keuangan nasional.

In collaboration with the Kumpulbaca community, the Company held a financial literacy webinar to discuss the phenomenon of self-reward, which is increasingly common among the younger generation. The Company actively organizes educational activities to support the positive growth of national financial literacy.

2025
17 Juli
July, 17

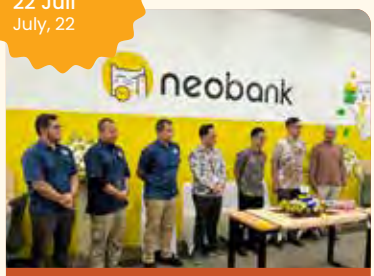


Health Talk "Silent Killer" – Bank Neo Commerce x Kalbe Farma x Siloam Hospital

Perseroan berkolaborasi dengan PT Kalbe Farma, Tbk dan Siloam Hospitals Group Kebon Jeruk Jakarta menggelar Health Talk yang menghadirkan Dokter Spesialis Jantung dan Pembuluh Darah untuk memberikan edukasi kepada Neobankers tentang pentingnya memulai pola hidup sehat agar terhindar dari berbagai penyakit, salah satunya adalah kolesterol. Dalam sesi ini juga, Neobankers dapat melakukan Mini Medical Check Up untuk mengetahui tingkat kolesterol, gula darah, dan juga asam urat. Perseroan memahami, bahwa kesehatan serta kesejahteraan Neobankers merupakan salah satu faktor penting dalam kelancaran operasional bisnis perusahaan.

The Company collaborated with PT Kalbe Farma, Tbk and Siloam Hospitals Group in Kebon Jeruk, Jakarta, to host a Health Talk featuring a cardiologist who provided education to Neobankers on the importance of adopting a healthy lifestyle to prevent various diseases, including high cholesterol. During this session, Neobankers could also take part in a Mini Medical Check-Up to check their cholesterol, blood sugar, and uric acid levels. The Company understands that the health and well-being of Neobankers are key factors in ensuring the smooth operation of the Company's business.

2025
22 Juli
July, 22



Peresmian Kantor Fungsional Collection Yogyakarta

Peresmian Kantor Fungsional Collection Yogyakarta

Perseroan meresmikan Kantor Fungsional Collection yang berlokasi di Yogyakarta. Dengan adanya Kantor Fungsional ini, menjadi pusat koordinasi tim Collection Perseroan untuk melayani seluruh nasabah.

The Company has officially unveiled its Functional Collection Office in Yogyakarta. This Functional Office serves as the coordination hub for the Company's Collection team to serve all customers.

2025
27 Juli
July, 27



WaraWiri Wirausaha
WaraWiri Wirausaha

Guna mendukung dan memberdayakan komunitas, Perseroan secara konsisten menggelar berbagai kegiatan menarik dengan konsep community gathering. WaraWiri Wirausaha menjadi salah satu wadah yang diinisiasi oleh Perseroan untuk memberikan edukasi keuangan kepada komunitas, salah satunya yaitu UMKM.

In order to support and empower the community, the Company consistently organizes various engaging activities with the concept of community gatherings. WaraWiri Wirausaha is one of the platforms initiated by the Company to provide financial education to the community, including MSMEs.

2025
14 Agustus
August, 14



Signing Ceremony Bank Neo Commerce x Yayasan WWF Indonesia

Perseroan menjalin kerja sama strategis dengan Yayasan WWF Indonesia untuk bersama-sama mendukung program pelestarian lingkungan yang dilakukan WWF-Indonesia. Tabungan Neo Green dihadirkan sebagai realisasi dari komitmen Bank Neo Commerce dalam penyediaan produk keuangan yang berkelanjutan, dimana program pelestarian lingkungan saat ini dilakukan melalui kerja sama dengan WWF-Indonesia.

The Company established a strategic partnership with WWF Indonesia Foundation to collectively support WWF-Indonesia's environmental conservation programs. The Neo Green Savings Account was launched as a concrete manifestation of Bank Neo Commerce's commitment to providing sustainable financial products, with environmental conservation efforts being carried out through a partnership with WWF-Indonesia.

2025
20 Agustus
August, 20



Bank Neo Commerce Town Hall & Neopendence Day

Dalam rangka memperingati Hari Kemerdekaan Indonesia yang ke-80, BNC menyelenggarakan *Town Hall* dengan rangkaian acara yang dikemas lebih interaktif. Selain update Perseroan terkini, diadakan juga sesi diskusi dan berbagi inspirasi bersama BOD, hingga fun games yang menciptakan suasana penuh keriaan dan kegembiraan.

In commemoration of the 80th Anniversary of Indonesia's Independence, BNC held a Town Hall with a series of events designed to be more interactive. In addition to the latest Company updates, there were also discussion sessions and inspirational talks with the Board of Directors, as well as fun games that brought a lively and joyful atmosphere.

2025
17 & 25 Sep
Sep, 17 & 25





Seremoni Relokasi KCP PIK & KC Medan
Relocation Ceremony of KCP PIK and KC Medan

Perseroan melakukan relokasi dua kantor cabangnya, yaitu Kantor Cabang Pembantu (KCP) Pantai Indah Kapuk dan Kantor Cabang (KC) Medan. Ini merupakan bagian dari salah satu upaya Perseroan untuk memberikan pelayanan yang semakin lebih baik bagi nasabah setia. Acara peresmian relokasi kantor cabang tersebut diselenggarakan di Jakarta pada 17 September 2025 dan Medan pada 25 September 2025. Berlangsung dengan penuh suka cita, acara ini dihadiri oleh jajaran Manajemen Perseroan, nasabah, puluhan wartawan, serta tamu undangan.

The Company has relocated two of its branches: the Pantai Indah Kapuk Branch Office (KCP) and the Medan Branch Office (KC). This is part of the Company's efforts to provide even better service to its loyal customers. The inauguration ceremonies for the relocated branch offices were held in Jakarta on September 17, 2025, and in Medan on September 25, 2025. The events, which were filled with joy, were attended by the Company's management, customers, dozens of journalists, and invited guests.

2025
23–26 Okt
Okt, 23-26



Neo Keliling Surabaya
Neo Keliling Surabaya

Perseroan hadir dalam gelaran FinEXpo yang merupakan puncak Bulan Inklusi Keuangan yang diadakan oleh OJK dan Bank Indonesia di Surabaya, Jawa Timur. Perseroan menghadirkan berbagai program dan penawaran menarik melalui produk serta layanan keuangan yang tersedia sepanjang kegiatan berlangsung.

The Company participated in FinEXpo, the highlight of Financial Inclusion Month organized by the OJK and Bank Indonesia in Surabaya, East Java. The Company presented a variety of programs and attractive offers through its financial products and services, which were available throughout the event

2025
27 & 29 Okt
Oct, 27 & 29



NeoTalks – Literasi Keuangan Bank Neo Commerce x Radio Gen FM dan DJ FM Surabaya

Perseroan melakukan agenda Roadshow di Surabaya dengan melakukan agenda Radio Talk Show ke Radio Gen FM & DJ FM Surabaya untuk memberikan edukasi keuangan dan semakin memperkenalkan kehadiran BNC di Surabaya.

The Company conducted a Roadshow agenda in Surabaya by conducting a Radio Talk Show agenda at Radio Gen FM & DJ FM Surabaya to provide financial education and further introduce BNC's presence in Surabaya.

2025
28 Oktober
Oct, 28



NeoTalks – Literasi Keuangan Bank Neo Commerce x Universitas Trunojoyo Madura

Dalam rangka turut serta menyemarakkan Bulan Inklusi Keuangan (BIK) dan kampanye Gerakan Nasional Cerdas Keuangan (GENCARKAN), Perseroan menggelar NeoTalks - kegiatan literasi keuangan yang dikemas dalam bentuk talk show interaktif di Fakultas Ekonomi & Bisnis (FEB) Universitas Trunojoyo Madura dengan mengangkat tema "Tantangan Mengelola Keuangan di Era Digital dan Mawas terhadap Penipuan Digital".

In order to celebrate Financial Inclusion Month (BIK) and support the National Financial Literacy Movement (GENCARKAN) campaign, the Company held NeoTalks, a financial literacy event presented as an interactive talk show at the Faculty of Economics and Business (FEB) Trunojoyo University of Madura, focusing on the theme "The Challenges of Managing Finances in the Digital Age and Staying Vigilant Against Digital Fraud.

2025
5 November
November, 5



Signing Ceremony Bank Neo Commerce x Zurich
Signing Ceremony Bank Neo Commerce x Zurich

Perseroan menjalin kerja sama strategis dengan PT Zurich Asuransi Indonesia Tbk ("Zurich") untuk menghadirkan produk asuransi Critical Illness Optimal Protection kepada nasabah BNC melalui skema bancassurance. Produk ini memberikan manfaat santunan kepada tertanggung apabila didiagnosis mengidap penyakit kritis tahap awal, penyakit kritis tahap akhir, atau penyakit terminal (terminal illness), termasuk di antaranya perlindungan terhadap 34 penyakit kritis, dan sudah tersedia bagi nasabah di seluruh kantor cabang BNC sejak November 2025.

The Company established a strategic partnership with PT Zurich Asuransi Indonesia Tbk ("Zurich") to offer the Critical Illness Optimal Protection insurance product for BNC customers through a bancassurance scheme. This product provides a benefit payout to the insured if diagnosed with an early-stage critical illness, a late-stage critical illness, or a terminal illness, including coverage for 34 critical illnesses, and has been available for customers at all BNC branches since November 2025.

2025
16 November
November, 16



Neobank Padel Tournament 2025

Perseroan mengadakan pagelaran Neobank Padel Tournament 2025 di Jakarta. Puluhan komunitas padel di bilangan Jakarta dan sekitarnya bergabung dan mengirimkan pemain-pemain terbaiknya untuk saling berkompetisi memperebutkan gelar juara. Pagelaran Neobank Padel Tournament 2025 menghadirkan ratusan peserta dari puluhan komunitas padel terbaik di Jakarta dan sekitarnya, untuk memperebutkan juara di dalam empat (4) kategori.

The company hosted the Neobank Padel Tournament 2025 in Jakarta. Dozens of padel communities in Jakarta and the surrounding areas came together and sent their best players to compete for the championship title. The Neobank Padel Tournament 2025 brought together hundreds of participants from dozens of the best padel communities in Jakarta and the surrounding areas to compete for the championship in four (4) categories.

2025
18 November
November, 18



Investor Meeting Neobank Commerce

Perseroan berkolaborasi dengan Stockbit menggelar Investor Meeting yang mengundang para investor retail. Pada kegiatan ini, Jajaran Manajemen Perseroan yang diwakili Direktur Utama, Direktur Bisnis, Chief Financial Officer, dan Head of Corplan & Investor Relations hadir untuk memberikan pemaparan terkait kinerja keuangan & bisnis terkini dari Perseroan.

The Company collaborated with Stockbit to host an Investor Meeting for retail investors. At the event, the Company's management team, represented by the CEO, the Business Director, the CFO, and the Head of Corporate Planning & Investor Relations, was present to provide an overview of the Company's latest financial and business performance.

2025
16 Desember
December, 16



Public Expose Tahunan 2025

Perseroan menggelar Public Expose Tahunan yang dihadiri oleh Direktur Utama BNC, Bapak Eri Budiono, Direktur Bisnis BNC, Bapak Aditya Windarwo, Chief Financial Officer BNC, Ibu Sufen Triantio, para Investor, Analis Sekuritas, dan rekan-rekan wartawan dari puluhan media nasional. Dalam rangkaian acara ini, Jajaran Direksi dan perwakilan Manajemen Perseroan memberikan paparan terkini mengenai gambaran umum Perseroan, kinerja keuangan, dan perkembangan bisnis terkini dari Perseroan.

The Company held its Annual Public Expose, attended by BNC's President Director, Mr. Eri Budiono; BNC's Business Director, Mr. Aditya Windarwo; BNC's Chief Financial Officer, Ms. Sufen Triantio; investors; securities analysts; and journalists from dozens of national media outlets. During the event, the Board of Directors and management representatives provided an update on the Company's overview, financial performance, and latest business developments



Laporan Manajemen

Management Report


BNC
bank neo commerce

Laporan Dewan Komisaris

Board of Commissioners' Report

Dewan Komisaris senantiasa mendukung BNC untuk terus tumbuh dan menghadirkan berbagai produk dan layanan yang inovatif

The Board of Commissioners consistently supports BNC's Growth and encourages the presentation of various innovative products and sercives

Para Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Dengan penuh tanggung jawab, kami mewakili Dewan Komisaris PT Bank Neo Commerce Tbk ("Perseroan" atau "BNC") menyampaikan laporan pelaksanaan fungsi pengawasan atas pengelolaan Perseroan sepanjang tahun buku 2025.

Dear Esteemed Shareholders and Stakeholders,

On behalf of the Board of Commissioners of PT Bank Neo Commerce Tbk ("the Company" or "BNC"), we hereby submit this report on the performance of our supervisory functions regarding the management of the Company throughout the 2025 fiscal year.

Kami bersyukur kepada Tuhan Yang Maha Esa atas karunia-Nya, sehingga di tengah dinamika bisnis yang kompleks, tekanan ketidakpastian global, serta tensi geopolitik yang belum sepenuhnya mereda, Perseroan bersama Direksi dan seluruh karyawan BNC (Neobankers) mampu menjaga ketahanan organisasi dan menutup tahun 2025 dengan capaian kinerja yang positif.

We are grateful to God Almighty for His blessings, which have enabled the Company, together with the Board of Directors and all BNC employees (Neobankers), to maintain organizational resilience and close out the year 2025 with positive performance results, despite complex business dynamics, the pressures of global uncertainty, and geopolitical tensions that have not yet fully subsided.

Sepanjang periode pelaporan, Dewan Komisaris secara konsisten menjalankan mandat pengawasan terhadap Direksi, termasuk memantau implementasi Rencana Bisnis Bank (RBB) dan Rencana Aksi Keuangan Berkelanjutan (RAKB). Pengawasan juga mencakup penelaahan terhadap perumusan dan eksekusi strategi serta kebijakan utama, penilaian atas prospek usaha yang disusun Direksi berikut pertimbangan yang mendasarinya, serta evaluasi atas penerapan tata kelola perusahaan dan efektivitas struktur organ tata kelola Perseroan.

Throughout the reporting period, the Board of Commissioners consistently carried out its supervisory role over the Board of Directors, including monitoring the implementation of the Bank's Business Plan (RBB) and the Sustainable Finance Action Plan (RAKB). The supervision also includes reviewing the formulation and execution of key strategies and policies, assessing the business outlook prepared by the Board of Directors including the underlying considerations, as well as evaluating the implementation of corporate governance and the effectiveness of the Company's governance structure.



INKAWAN D. JUSI

Komisaris Utama Independen
Independent President Commissioner



Fungsi Pengawasan dan Hubungan Kerja dengan Direksi

Sebagai organ Perseroan yang dibentuk sesuai ketentuan peraturan perundang-undangan, Dewan Komisaris memiliki tanggung jawab utama untuk melakukan pengawasan dan memberikan nasihat atas pengurusan Perseroan oleh Direksi. Peran ini dijalankan secara aktif, mulai dari tahap perumusan strategi, penyusunan dan implementasi rencana bisnis, pemantauan kinerja, hingga pengawasan terhadap penerapan manajemen risiko dan prinsip tata kelola perusahaan yang baik (*Good Corporate Governance*).

Pengawasan dilakukan untuk memastikan konsistensi pelaksanaan kegiatan usaha dengan RBB serta kepatuhan terhadap prinsip GCG di seluruh unit organisasi.

Dalam pelaksanaannya, hubungan kerja antara Dewan Komisaris dan Direksi dibangun atas dasar saling menghormati dan keterbukaan. Sepanjang 2025, berbagai rapat koordinasi telah dilaksanakan untuk membahas isu-isu strategis maupun operasional perbankan. Dewan Komisaris juga didukung oleh komite-komite di bawahnya yang berperan memberikan pendalaman dan rekomendasi, khususnya dalam aspek keuangan, manajemen risiko, serta tata kelola perusahaan. Pada kesempatan tertentu, pejabat eksekutif terkait turut diundang untuk memberikan pemaparan sesuai agenda pembahasan.

Selain melalui forum formal, komunikasi pengawasan juga dilakukan secara berkelanjutan melalui dialog terbuka dengan Direksi dan pejabat eksekutif, sejalan dengan karakter industri perbankan berbasis digital yang dinamis.

Adapun ruang lingkup pengawasan Dewan Komisaris mencakup antara lain:

1. Evaluasi pelaksanaan RBB, baik dari sisi kuantitatif maupun kualitatif, termasuk realisasi RAKB;
2. Penilaian terhadap faktor-faktor yang mem engaruhi kinerja Perseroan, khususnya aspek permodalan (*capital*), rentabilitas (*earnings*), profil risiko terutama risiko kredit, risiko pasar, dan risiko likuiditas serta kualitas tata kelola; dan
3. Pemantauan langkah-langkah perbaikan kinerja apabila teridentifikasi potensi penurunan kinerja Bank.

Supervisory Functions and Working Relationship with the Board of Directors

As a corporate organ established under the laws and regulations, the Board of Commissioners is primarily responsible for supervising and advising on the management of the Company by the Board of Directors. The BOC actively carries out this role by participating in the formulation of strategies, drafting and implementing business plans, monitoring performance, and overseeing the implementation of risk management and the principles of good corporate governance (Good Corporate Governance).

Supervision is conducted to ensure consistency in business operations with the RBB and compliance with GCG principles across all organizational units.

In practice, the working relationship between the Board of Commissioners and the Board of Directors is built on mutual respect and transparency. Throughout 2025, various coordination meetings were held to discuss strategic and operational banking issues. The Board of Commissioners is also supported by its committees, which provide in-depth analysis and recommendations, particularly regarding financial matters, risk management, and corporate governance. On certain occasions, relevant executive officers are invited to deliver presentations in accordance with the discussion agenda.

Besides formal forums, supervisory communication is also conducted continuously through open dialogue with the Board of Directors and executive officers, in line with the dynamic nature of the banking industry.

The scope of the Board of Commissioners' supervision includes:

1. Evaluating the implementation of RBB, both from quantitative and qualitative perspectives, including the realization of RAKB;
2. Evaluating factors affecting the Company's performance, particularly capital, earnings, risk profile—especially credit risk, market risk, and liquidity risk—as well as governance quality; and
3. Monitoring performance improvement measures if a potential decline in the Bank's performance is identified.

Penilaian Dewan Komisaris terhadap Kondisi Perekonomian Terkini

Menjelang akhir tahun 2025, perekonomian global berada dalam fase pertumbuhan yang moderat namun masih dibayangi oleh berbagai ketidakpastian. Proyeksi pertumbuhan ekonomi dunia berada di kisaran sekitar 3%, dengan sejumlah risiko yang masih cenderung ke bawah. Perlambatan pertumbuhan di beberapa negara maju terjadi seiring berlanjutnya pengetatan kondisi keuangan dan moderasi permintaan domestik, sementara sejumlah negara *emerging markets* menghadapi tekanan dari volatilitas arus modal serta pelemahan harga komoditas tertentu.

Inflasi global menunjukkan tren penurunan dibandingkan puncaknya pada periode pascapandemi, meskipun di beberapa negara maju masih berada sedikit di atas target bank sentral. Di Amerika Serikat dan kawasan Eropa, inflasi inti masih relatif tinggi sehingga mendorong bank sentral mempertahankan sikap kebijakan moneter yang berhati-hati. The Federal Reserve pada paruh kedua tahun 2025 mulai menurunkan suku bunga kebijakan sebesar 25 basis poin ke kisaran 4,00–4,25%, sebagai bagian dari proses normalisasi kebijakan yang dilakukan secara bertahap dengan tetap memperhatikan dinamika inflasi dan kondisi pasar tenaga kerja.

Di sisi lain, Tiongkok masih menghadapi tantangan pemulihan ekonomi yang tidak merata, termasuk tekanan di sektor properti serta kecenderungan deflasi, meskipun terdapat indikasi perbaikan secara bertahap pada permintaan domestik. Sementara itu, perlambatan aktivitas industri dan konsumsi turut memengaruhi kinerja ekonomi di kawasan Eropa dan Inggris Raya pada paruh kedua tahun pelaporan.

Di tengah dinamika global tersebut, perekonomian Indonesia menunjukkan ketahanan yang relatif kuat. Sampai dengan akhir tahun 2025, pertumbuhan ekonomi tercatat sebesar 5,11% (yoy), didukung oleh konsumsi rumah tangga yang tetap solid serta kinerja ekspor yang masih positif. Investasi yang tercermin dalam Pembentukan Modal Tetap Bruto (PMTB) juga menunjukkan pertumbuhan moderat, mencerminkan optimisme pelaku usaha terhadap prospek ekonomi nasional. Bank Indonesia turut mengarahkan kebijakan moneter ke arah yang lebih akomodatif dengan menurunkan BI Rate menjadi 4,75% guna menjaga momentum pertumbuhan sekaligus mempertahankan stabilitas makroekonomi.

The Board of Commissioners' Assessment of Current Economic Conditions

Toward the end of 2025, the global economy entered a phase of moderate growth, despite being overshadowed by various uncertainties. Global economic growth projections stood at around 3%, with several risks still trending downward. Growth slowdowns in several developed nations are occurring alongside continued tightening of financial conditions and moderating domestic demand, while a number of emerging markets face pressure from capital flow volatility and the weakening of certain commodity prices.

Global inflation is showing a downward trend compared to its peak in the post-pandemic period, although in some developed nations it remains slightly above central bank targets. In the United States and Europe, core inflation remains relatively high, prompting central banks to maintain a cautious monetary policy stance. In the second half of 2025, the Federal Reserve began lowering its policy interest rate by 25 basis points to a range of 4.00–4.25%, as part of a gradual policy normalization process while closely monitoring inflation dynamics and labor market conditions.

On the other hand, China continues to face challenges from an uneven economic recovery, including pressures in the property sector and deflationary trends, although there are indications of a gradual improvement in domestic demand. Meanwhile, a slowdown in industrial activity and consumption also affected economic performance in the European region and the United Kingdom in the second half of the reporting year.

Amid these global dynamics, the Indonesian economy demonstrated relatively strong resilience. At the end of 2025, economic growth stood at 5.11% (yoy), supported by solid household consumption and continued positive export performance. Investment, as reflected in Gross Fixed Capital Formation (GFCF), also showed moderate growth, reflecting business actors' optimism regarding the national economic outlook. Bank Indonesia also steered monetary policy toward a more accommodative stance by lowering the BI Rate to 4.75% to maintain growth momentum while preserving macroeconomic stability.

Stabilitas tersebut tercermin pula pada kinerja sektor perbankan nasional yang tetap resilien hingga akhir tahun 2025. Pertumbuhan kredit industri berada pada kisaran tinggi satu digit, sementara Dana Pihak Ketiga (DPK) mencatat pertumbuhan dua digit yang memperkuat basis pendanaan domestik. Likuiditas perbankan tetap memadai dan didukung oleh permodalan yang kuat dengan rasio kecukupan modal industri yang berada pada level tinggi. Di sisi lain, kualitas aset tetap terjaga dengan rasio kredit bermasalah yang berada pada tingkat yang relatif rendah dan terkendali.

This stability is also reflected in the performance of the national banking sector, which remained resilient through the end of 2025. Industry credit growth remained in the high single-digit range, while Third-Party Funds (TPF) recorded double-digit growth, strengthening the domestic funding base. Banking liquidity remained adequate and was supported by strong capitalization, with the industry's capital adequacy ratio at a high level. On the other hand, asset quality remains well-maintained, with the non-performing loan ratio at a relatively low and controlled level.

Dengan mempertimbangkan perkembangan tersebut, Dewan Komisaris menilai bahwa Perseroan telah mengambil langkah yang tepat dalam merespons dinamika eksternal sepanjang tahun pelaporan. Strategi yang dijalankan berfokus pada penguatan fundamental bisnis, pengelolaan risiko yang *prudent,* serta peningkatan kualitas tata kelola perusahaan secara berkelanjutan. Perseroan juga terus memperkuat disiplin dalam pengelolaan portofolio kredit serta menjaga kepatuhan terhadap prinsip kehati-hatian sebagai bagian dari upaya mempertahankan kualitas aset dan stabilitas kinerja.

Considering these developments, the Board of Commissioners believes that the Company has taken appropriate steps in responding to external dynamics throughout the reporting year. The strategies implemented focus on strengthening business fundamentals, prudent risk management, and the continuous improvement of corporate governance quality. The Company also continues to reinforce discipline in credit portfolio management and uphold compliance with the principle of prudence as part of efforts to maintain asset quality and performance stability.

Dewan Komisaris meyakini bahwa melalui penguatan fondasi bisnis, disiplin manajemen risiko, serta komitmen terhadap tata kelola yang baik, Perseroan memiliki kapasitas untuk terus menjaga ketahanan usaha sekaligus mendorong pertumbuhan yang sehat dan berkelanjutan. Pendekatan ini menjadi landasan penting bagi Perseroan dalam menciptakan nilai jangka panjang bagi seluruh pemangku kepentingan di tengah dinamika ekonomi yang terus berkembang.

The Board of Commissioners believes that by strengthening its business foundation, risk management discipline, and commitment to good governance, the Company has the capacity to sustain business resilience while driving healthy and sustainable growth. This approach serves as a crucial foundation for the Company in creating long-term value for all stakeholders amidst the evolving economic landscape.

Penilaian Kinerja Direksi

Sebagai bagian dari fungsi pengawasan, Dewan Komisaris melakukan evaluasi atas kebijakan dan pelaksanaan pengurusan Perseroan oleh Direksi, dengan tetap menjunjung kepatuhan terhadap peraturan perundang-undangan dan Anggaran Dasar Perseroan.

Penilaian dilakukan secara independen dengan mempertimbangkan kemampuan Direksi dalam mengoptimalkan sumber daya secara akuntabel dan *prudent.* Parameter evaluasi mencakup pencapaian target dalam RBB dan RAKB, serta pemenuhan tugas dan tanggung jawab Direksi, dengan tetap mempertimbangkan faktor eksternal seperti kondisi ekonomi dan industri perbankan.

Board of Directors Performance Assessment

As part of its supervisory function, the Board of Commissioners evaluates the policies and implementation of the Company's management by the Board of Directors, while upholding compliance with laws and regulations and the Company's Articles of Association.

The assessment is conducted independently, taking into account the Board of Directors' ability to optimize resources in an accountable and prudent manner. The assessment parameters encompass the achievement of targets in the Annual Business Plan (ABP) and Annual Work Plan (AWP), as well as the fulfillment of the Board of Directors' duties and responsibilities, while also considering external factors such as economic conditions and the banking industry.

Sepanjang 2025, kinerja Direksi dinilai menunjukkan perbaikan yang signifikan. Hal ini tercermin dari:

Penurunan rasio Beban Operasional terhadap Pendapatan Operasional (BOPO) sebesar 15,16%, dari 99,34% menjadi 84,18%;

Decrease in Operating Expense to Operating Income (BOPO) ratio by 15.16%, from 99.34% to 84.18%;

Throughout 2025, the Board of Directors' performance showed significant improvements. These improvements are reflected in:

***Cost to income ratio* (CIR) cenderung stabil dari 31,47% menjadi 32,58% per Desember 2025.**

Relatively stable Cost to Income Ratio (CIR) from 31.47% to 32.58% as of December 2025.

Upaya Perseroan dalam memperkuat efisiensi operasional dan meningkatkan kualitas aset telah menghasilkan pembalikan kinerja yang signifikan. Laba Perseroan meningkat dari Rp19,88 miliar pada akhir 2024 menjadi Rp566 miliar pada akhir 2025.

The Company's efforts to strengthen operational efficiency and improve asset quality have resulted in a significant turnaround in performance. The Company's profit increased from Rp19.88 billion at the end of 2024 to Rp566 billion at the end of 2025.

Dalam menghadapi era digital, Dewan Komisaris juga memberikan perhatian khusus pada aspek keamanan data dan infrastruktur teknologi informasi. Pengawasan dilakukan melalui evaluasi dan audit berkala guna memastikan kepatuhan terhadap regulasi serta penerapan standar keamanan siber yang memadai untuk melindungi data nasabah.

In facing the digital era, the Board of Commissioners also pays special attention to data security and information technology infrastructure. Supervision is carried out through periodic evaluations and audits to ensure compliance with regulations and the implementation of adequate cybersecurity standards to protect customer data.

Selain itu, Dewan Komisaris mendorong penerapan budaya kerja *agile* yang berorientasi pada kebutuhan nasabah, memperkuat kolaborasi tim, dan mempercepat pengambilan keputusan secara terukur.

In addition, the Board of Commissioners encourages the implementation of an agile and customer-centric work culture, strengthens team collaboration, and accelerates measured decision-making.

Secara keseluruhan, Dewan Komisaris menyambut positif capaian Perseroan pada tahun 2025. Ketahanan dan perbaikan kinerja yang berhasil dicapai di tengah kondisi ekonomi yang dinamis menjadi fondasi yang kuat bagi pertumbuhan berkelanjutan Perseroan di masa mendatang.

Overall, the Board of Commissioners has a positive view of the Company's achievements in 2025. The Company's success in maintaining resilience and improving performance amid dynamic economic conditions serves as a strong foundation for its sustainable growth in the future.

Pengawasan terhadap Perumusan dan Implementasi Strategi dan Kebijakan Bank

Dalam struktur tata kelola Perseroan, terdapat pembagian peran yang jelas antara Dewan Komisaris dan Direksi. Direksi bertanggung jawab atas pengelolaan operasional dan pengembangan bisnis, sedangkan Dewan Komisaris menjalankan fungsi pengawasan atas seluruh proses pengurusan tersebut.

Untuk memastikan fungsi pengawasan berjalan efektif, Dewan Komisaris mengoptimalkan berbagai mekanisme formal, antara lain melalui rapat internal Dewan Komisaris, rapat bersama Direksi, rapat komite di bawah Dewan Komisaris, pemberian arahan dan keputusan, serta pelaksanaan kunjungan kerja. Seluruh mekanisme ini juga bertujuan memastikan implementasi prinsip dan praktik *Good Corporate Governance* (GCG) berlangsung konsisten di seluruh tingkatan organisasi.

Dalam menjalankan mandatnya, Dewan Komisaris berpedoman pada Anggaran Dasar Perseroan dan ketentuan peraturan perundang-undangan yang berlaku, termasuk dalam melakukan pengawasan atas penyusunan serta pelaksanaan strategi dan kebijakan strategis.

Sepanjang tahun 2025, perhatian Dewan Komisaris difokuskan pada pengawalan arah strategis Perseroan agar tetap adaptif terhadap tantangan ekonomi sekaligus mampu menghasilkan kinerja yang sehat. Lingkup pengawasan mencakup, namun tidak terbatas pada, evaluasi atas *corporate action*, pelaksanaan Rencana Bisnis Bank (RBB), proses penunjukan Auditor Eksternal, serta efektivitas sistem pengendalian internal.

Dalam proses perumusan RBB, Dewan Komisaris memastikan bahwa aspirasi dan kepentingan para pemangku kepentingan telah diakomodasi secara memadai.

Selain itu, Dewan Komisaris juga melakukan evaluasi terhadap kinerja keuangan dan operasional Bank, penguatan kapasitas bisnis digital dan keamanan siber, pengembangan sumber daya manusia, implementasi teknologi perbankan digital, peningkatan kualitas aset melalui strategi perkreditan yang mengedepankan prinsip kehati-hatian, penguatan penghimpunan dana pihak ketiga, peningkatan produktivitas dan efisiensi, serta efektivitas penerapan manajemen risiko.

Supervision of the Formulation and Implementation of the Bank's Strategies and Policies

Within the Company's governance structure, there is a clear division of roles between the Board of Commissioners and the Board of Directors. The Board of Directors is responsible for operational management and business development, while the Board of Commissioners performs a supervisory function over the entire management process.

To ensure that the supervisory function is effective, the Board of Commissioners optimizes various formal mechanisms, including through internal meetings of the Board of Commissioners, joint meetings with the Board of Directors, meetings of committees under the Board of Commissioners, the provision of guidance and decisions, as well as work visits. All of these mechanisms also aim to ensure that the implementation of Good Corporate Governance (GCG) principles and practices is consistent across all levels of the organization.

In carrying out its mandate, the Board of Commissioners adheres to the Company's Articles of Association and applicable laws and regulations, including in supervising the formulation and implementation of strategies and strategic policies.

Throughout 2025, the Board of Commissioners' focus is on guiding the Company's strategic direction to remain adaptive to economic challenges while delivering sound performance. The scope of supervision includes, but is not limited to, the evaluation of corporate actions, the implementation of the Bank's Business Plan (RBB), the appointment process of External Auditors, and the effectiveness of the internal control system.

In the formulation of the RBB, the Board of Commissioners ensures that the aspirations and interests of stakeholders are adequately accommodated.

Furthermore, the Board of Commissioners also evaluates the Bank's financial and operational performance, the reinforcement of digital business capabilities and cybersecurity, human resource development, the implementation of digital banking technology, asset quality improvement through a credit strategy prioritizing the principle of prudence, the strengthening of third-party funding mobilization, increased productivity and efficiency, as well as the effectiveness of risk management implementation.

Dewan Komisaris memberikan apresiasi atas berbagai inisiatif dan kebijakan strategis yang telah dijalankan Direksi sepanjang 2025 dalam memperkuat fundamental Perseroan.

Pandangan atas Prospek Usaha yang Disusun oleh Direksi

Memasuki tahun 2026, perekonomian Indonesia diproyeksikan tetap berada pada jalur pertumbuhan yang solid. Pemerintah menetapkan target pertumbuhan ekonomi tahun 2026 sebesar 5,4%. Proyeksi pertumbuhan tersebut ditopang oleh peningkatan aktivitas domestik, kebijakan ekonomi pemerintah yang lebih proaktif, partisipasi sektor swasta dalam pembangunan infrastruktur, konsumsi masyarakat yang tetap kuat, serta penguatan segmen UMKM melalui berbagai stimulus dan program bantuan sosial.

Dengan mempertimbangkan kondisi makro ekonomi tersebut, Dewan Komisaris menilai bahwa kebijakan dan arah strategis yang dirumuskan Direksi dalam RBB telah disusun secara hati-hati dengan memperhatikan *risk appetite* sebagai komponen utama perencanaan strategis. Target pertumbuhan yang ditetapkan dinilai realistis dan mempertimbangkan potensi pasar di berbagai segmen.

Direksi juga telah memasukkan asumsi dan proyeksi ekonomi ke depan secara komprehensif dalam perencanaan strategisnya. Dengan memaksimalkan kekuatan internal dan memastikan seluruh inisiatif bisnis berjalan selaras, Dewan Komisaris meyakini Perseroan memiliki fondasi yang kuat untuk mencatat pertumbuhan yang lebih baik di masa mendatang.

Pandangan atas Penerapan Tata Kelola dan Manajemen Risiko

Tata Kelola Perusahaan

Good Corporate Governance (GCG) merupakan kerangka prinsip yang menjadi dasar pengelolaan Perseroan secara profesional, transparan, dan bertanggung jawab. Penerapan GCG berperan penting dalam meningkatkan kinerja, memperkuat daya saing, serta menciptakan nilai jangka panjang bagi perusahaan.

The Board of Commissioners commends the Board of Directors for implementing various initiatives and strategic policies throughout 2025 to strengthen the Company's fundamentals.

Overview of Business Prospects Prepared by the Board of Directors

Going into 2026, Indonesia's economy is projected to remain on a solid growth trajectory. The government has set a 2026 economic growth target of 5.4%. This growth projection is supported by increased domestic activity, more proactive government economic policies, private sector participation in infrastructure development, sustained strong consumer spending, and the empowerment of the MSME segment through various stimulus and social assistance programs.

Taking these macroeconomic conditions into account, the Board of Commissioners believes that the policies and strategic directions formulated by the Board of Directors in the RBB have been carefully prepared in accordance to risk appetite as a key component of strategic planning. The established growth targets are deemed realistic and consider the market potential across various segments.

The Board of Directors has also comprehensively incorporated forward-looking economic assumptions and projections into its strategic planning. By maximizing internal capabilities and ensuring all business initiatives are aligned, the Board of Commissioners believes the Company has a strong foundation to achieve better growth in the future.

Overview of the Implementation of Corporate Governance and Risk Management

Corporate Governance

Good Corporate Governance (GCG) is a framework of principles that forms the basis for the Company's professional, transparent, and responsible management. The implementation of GCG plays a crucial role in enhancing performance, strengthening competitiveness, and creating long-term value for the company.

GCG juga menjadi instrumen utama dalam melindungi kepentingan pemangku kepentingan, memastikan kepatuhan terhadap regulasi, menjamin perlindungan hak pemegang saham, serta memperkuat aspek etika, manajemen risiko, dan keterbukaan informasi. Implementasi GCG yang konsisten merupakan fondasi bagi keberlanjutan kinerja bisnis.

GCG also serves as a key instrument in protecting stakeholder interests, ensuring regulatory compliance, safeguarding shareholder rights, and reinforcing ethical standards, risk management, and transparency. Consistent implementation of GCG is the foundation for sustainable business performance.

Dewan Komisaris mendukung penuh penerapan prinsip-prinsip GCG dalam seluruh aktivitas Perseroan. Berdasarkan penilaian Dewan Komisaris, Perseroan telah mengimplementasikan pedoman dan ketentuan tata kelola sesuai dengan regulasi Otoritas Jasa Keuangan serta terus melakukan penyempurnaan pada seluruh tingkatan organisasi. Perbaikan berkelanjutan tersebut mencerminkan komitmen Direksi dalam memperkuat praktik tata kelola di setiap lini operasional.

The Board of Commissioners fully supports the application of GCG principles in all of the Company's activities. Based on the Board of Commissioners' assessment, the Company has implemented governance guidelines and provisions in accordance with Financial Services Authority regulations and continues to make improvements at all organizational levels. These continuous improvements reflect the Board of Directors' commitment to strengthening governance practices across all operational lines.

Efektivitas penerapan GCG juga ditunjang oleh sinergi antara organ pendukung Dewan Komisaris dan organ pendukung Direksi. Keberadaan komite dan fungsi pendukung tersebut memastikan pengawasan atas kepatuhan, manajemen risiko, audit internal, pengembangan SDM, serta penguatan teknologi informasi berjalan optimal sebagai fondasi akuntabilitas Bank.

The effectiveness of GCG implementation is also supported by synergy between the supporting organs of the Board of Commissioners and the Board of Directors. The existence of these committees and supporting functions ensures that the supervision of compliance, risk management, internal audit, human resource development, and the strengthening of information technology are optimally carried out as the foundation of the Bank's accountability.

Saat ini, komposisi Komisaris Independen telah melebihi 50% dari total anggota Dewan Komisaris. Proporsi ini memperkuat objektivitas dan independensi pengambilan keputusan serta memastikan perlindungan kepentingan Perseroan dan seluruh pemangku kepentingan.

Currently, the composition of Independent Commissioners exceeds 50% of the total members of the Board of Commissioners. This proportion strengthens the objectivity and independence of decision-making and ensures the protection of the Company's interests and those of all stakeholders.

Manajemen Risiko

Risk Management

Dalam industri perbankan, sistem pengendalian internal dan manajemen risiko merupakan elemen yang tidak terpisahkan dari keberlangsungan usaha. Dewan Komisaris menilai bahwa Perseroan telah memiliki sistem pengendalian internal yang memadai dan sesuai dengan profil risiko Bank.

In the banking industry, internal control systems and risk management are integral elements of business continuity. The Board of Commissioners considers that the Company has an adequate internal control system that aligns with the Bank's risk profile.

Pengendalian internal dijalankan secara efektif sebagai bagian integral dari manajemen Bank dan menjadi fondasi operasional yang sehat dan aman. Sepanjang 2025, Dewan Komisaris melakukan pengawasan aktif atas implementasi sistem pengendalian internal, termasuk menyetujui Kebijakan Manajemen Risiko Likuiditas dan Rencana Pendanaan Darurat, Kebijakan Penerapan Manajemen Risiko, serta penetapan *Risk Appetite* dan *Risk Tolerance* Perseroan.

Internal controls are effectively implemented as an integral part of the Bank's management and serve as the foundation for sound and secure operations. Throughout 2025, the Board of Commissioners actively supervised the implementation of the internal control system, including approving the Liquidity Risk Management Policy and Contingency Funding Plan, the Risk Management Implementation Policy, as well as establishing the Company's Risk Appetite and Risk Tolerance.

Dewan Komisaris terlibat secara aktif dalam pengawasan pelaksanaan manajemen risiko oleh Direksi. Proses pengelolaan risiko dilakukan secara proaktif dan berorientasi ke depan (*forward looking*), serta terdokumentasi melalui tahapan identifikasi, pengukuran, pemantauan, dan pengendalian risiko.

Kecukupan manajemen risiko juga tercermin dari efektivitas sistem pengendalian internal yang memastikan seluruh proses berjalan terstruktur, efisien, dan sesuai regulasi. Aktivitas pengendalian dilakukan dengan menerapkan prinsip *segregation of duties* guna mencegah konsentrasi kewenangan pada satu individu dan meminimalkan potensi penyalahgunaan.

Selain sistem yang memadai, pengelolaan risiko didukung oleh tim manajemen risiko yang kompeten dan berpengalaman.

Pandangan atas Penerapan Sistem Pelaporan Pelanggaran *(Whistleblowing System)*

Sebagai bagian dari komitmen pencegahan fraud, Perseroan menerapkan Sistem Pelaporan Pelanggaran (*Whistleblowing System*/WBS). Sistem ini dirancang untuk mendeteksi dan mencegah potensi penyimpangan sejak dini di seluruh aktivitas bisnis.

WBS menyediakan mekanisme pelaporan yang menjamin kerahasiaan pelapor serta membuka ruang partisipasi bagi seluruh insan Perseroan, mitra, maupun pihak eksternal untuk melaporkan dugaan pelanggaran. Keberadaan sistem ini mendukung terciptanya lingkungan kerja yang transparan, berintegritas, dan bertanggung jawab.

Dalam pelaksanaannya, Dewan Komisaris dibantu oleh Komite Audit yang bertugas melakukan pemantauan, evaluasi, serta tindak lanjut atas setiap laporan yang diterima, sekaligus memastikan perbaikan dilakukan untuk mencegah pengulangan kejadian serupa. Dewan Komisaris juga terus memperkuat efektivitas mekanisme WBS melalui penyempurnaan prosedur dan pengawasan berkelanjutan. Informasi lengkap terkait WBS dapat dilihat pada halaman 461-463.

The Board of Commissioners is actively involved in overseeing the implementation of risk management by the Board of Directors. The risk management process is conducted proactively and with a forward-looking perspective, and is documented through the stages of risk identification, measurement, monitoring, and control.

The adequacy of risk management is also reflected in the effectiveness of the internal control system, which ensures that all processes are conducted structurally, efficiently, and in compliance with regulations. Control activities are carried out by applying the principle of segregation of duties to prevent the concentration of authority in a single individual and minimize the potential for abuse.

Besides an adequate system, risk management is supported by a competent and experienced risk management team.

Overview of the Implementation of the Whistleblowing System

As part of its commitment to prevent fraud, the Company has implemented a Whistleblowing System (WBS). This system is designed to detect and prevent potential irregularities as early as possible across all business activities.

The WBS provides a reporting mechanism that guarantees the confidentiality of the whistleblower and allows all Company employees, partners, and external parties to report suspected violations. The existence of this system supports the creation of a transparent, ethical, and accountable work environment.

In practice, the Board of Commissioners is assisted by the Audit Committee, which is tasked with monitoring, evaluating, and following up on every report received, while ensuring corrective actions are taken to prevent the recurrence of similar incidents. The Board of Commissioners also continues to strengthen the effectiveness of the WBS mechanism by improving procedures and maintaining continuous supervision. Detailed information regarding the WBS can be found on the page 461-463.

Dewan Komisaris menilai bahwa pelaksanaan WBS di lingkungan Perseroan telah berjalan dengan baik. Melalui sinergi bersama unit terkait, pengawasan atas proses pelaporan dan kepatuhan terhadap hukum serta regulasi terus dilakukan secara konsisten.

Frekuensi dan Tata Cara Pemberian Nasihat kepada Direksi

Dewan Komisaris secara konsisten menyelenggarakan rapat sebagai forum utama untuk menyampaikan nasihat, arahan, rekomendasi, serta pandangan strategis kepada Direksi. Sesuai ketentuan, Rapat Dewan Komisaris dilaksanakan paling sedikit 1 (satu) kali dalam 2 (dua) bulan dan dapat diselenggarakan sewaktu-waktu apabila diperlukan.

Selain itu, Anggaran Dasar Perseroan mengatur kewajiban pelaksanaan Rapat Gabungan Dewan Komisaris dan Direksi sekurang-kurangnya 1 (satu) kali dalam 4 (empat) bulan. Forum ini menjadi ruang diskusi strategis untuk memastikan keselarasan arah kebijakan dan pengawasan.

Pemberian nasihat tidak hanya dilakukan melalui rapat formal, tetapi juga melalui rapat komite di bawah Dewan Komisaris, penyampaian arahan atau pendapat tertulis, serta kunjungan kerja. Dalam kondisi tertentu yang membutuhkan respons cepat atau ketika terjadi perubahan kebijakan yang signifikan, nasihat juga dapat diberikan secara nonformal dengan tetap berpedoman pada peraturan dan ketentuan yang berlaku.

Sepanjang tahun 2025, Dewan Komisaris terus mengoptimalkan fungsi pengawasannya dalam mendukung pengelolaan Perseroan oleh Direksi. Seluruh rapat terdokumentasi dengan baik sebagai bagian dari praktik tata kelola yang akuntabel.

Penilaian Komite di Bawah Dewan Komisaris

Dalam mendukung pelaksanaan tugas pengawasan, Dewan Komisaris membentuk tiga komite, yaitu Komite Audit, Komite Pemantau Risiko, dan Komite Nominasi dan Remunerasi. Ketiga komite ini berperan strategis dalam memperkuat kualitas pengawasan dan memastikan setiap aspek tata kelola berjalan sesuai ketentuan.

The Board of Commissioners believes that the implementation of the WBS within the Company has been proceeding well. Through collaboration with relevant units, supervision of the reporting process and compliance with laws and regulations is consistently maintained.

Frequency and Procedures in Providing Advice to the Board of Directors

The Board of Commissioners consistently holds meetings as the primary forum to convey advice, guidance, recommendations, and strategic perspectives to the Board of Directors. In accordance with regulations, Board of Commissioners meetings are held at least once every two months and may be convened at any time as needed.

Additionally, the Company's Articles of Association stipulate the obligation to hold Joint Meetings of the Board of Commissioners and the Board of Directors at least once every four months. This forum serves as a strategic discussion platform to ensure alignment in policy direction and oversight.

Advice is provided not only through formal meetings but also through committee meetings under the Board of Commissioners, the submission of written directives or opinions, and working visits. Under certain conditions that require a quick response or when significant policy changes occur, advice may also be provided informally while still adhering to applicable regulations and provisions.

Throughout 2025, the Board of Commissioners continued to optimize its supervisory functions in support of the Company's management by the Board of Directors. All meetings were well-documented as part of accountable governance practices.

Assessment of Committees Under the Board of Commissioners

To support the performance of its supervisory duties, the Board of Commissioners established three committees: the Audit Committee, the Risk Oversight Committee, and the Nomination and Remuneration Committee. These three committees play a strategic role in strengthening the quality of supervision and ensuring that every aspect of corporate governance operates in accordance with regulations.

Komite Audit dan Komite Pemantau Risiko menyelenggarakan rapat sekurang-kurangnya 1 (satu) kali setiap bulan, sedangkan Komite Nominasi dan Remunerasi melaksanakan rapat paling sedikit 1 (satu) kali dalam 3 (tiga) bulan.

Sepanjang 2025, komite-komite tersebut telah berkontribusi antara lain dalam:

- Menelaah laporan dan informasi keuangan, kepatuhan terhadap regulasi, serta mengevaluasi kinerja auditor internal.
- Memberikan rekomendasi terkait penunjukan akuntan publik dan memantau tindak lanjut Direksi atas temuan auditor internal maupun eksternal.
- Memberikan rekomendasi terkait komposisi Direksi dan Dewan Komisaris.
- Memberikan pertimbangan atas kebijakan remunerasi, nominasi, serta evaluasi kinerja Direksi.
- Memastikan pengelolaan Perseroan berjalan sesuai peraturan, kebijakan, dan standar yang berlaku.
- Memberikan saran strategis kepada Direksi dalam berbagai aspek pengelolaan perusahaan.
- Mengawasi efektivitas sistem manajemen risiko.
- Memantau kinerja Perseroan secara berkala, baik dari sisi keuangan maupun non keuangan.

Dewan Komisaris menyampaikan apresiasi atas dukungan dan kontribusi aktif komite-komite tersebut dalam meningkatkan efektivitas fungsi pengawasan. Sepanjang 2025, Komite Audit, Komite Pemantau Risiko, serta Komite Nominasi dan Remunerasi menunjukkan kinerja yang baik, berpedoman pada standar kompetensi serta pedoman kerja masing-masing.

Penilaian ini didasarkan pada efektivitas komite dalam mendukung pelaksanaan tugas Dewan Komisaris, efektivitas peran Ketua Komite, serta kualitas interaksi dan proses pengambilan keputusan dalam setiap rapat komite.

The Audit Committee and the Risk Oversight Committee hold meetings at least once a month, while the Nomination and Remuneration Committee holds meetings at least once every three months.

Throughout 2025, these committees have contributed to:

- Reviewing financial reports and information, compliance with regulations, and evaluating the performance of internal auditors.
- Providing recommendations regarding the appointment of public accountants and monitoring the Board of Directors' follow-up on findings from both internal and external auditors.
- Providing recommendations regarding the composition of the Board of Directors and the Board of Commissioners.
- Providing input on remuneration policies, nominations, and the evaluation of the Board of Directors' performance.
- Ensuring the Company's management operates in accordance with applicable regulations, policies, and standards.
- Providing strategic advice to the Board of Directors on various aspects of corporate management.
- Monitoring the effectiveness of the risk management system.
- Monitoring the Company's performance periodically, both from financial and non-financial perspectives.

The Board of Commissioners expresses its appreciation for the support and active contributions of these committees in increasing the effectiveness of its supervisory function. Throughout 2025, the Audit Committee, the Risk Oversight Committee, and the Nomination and Remuneration Committee demonstrated strong performance, guided by their respective competency standards and operational guidelines.

This assessment is based on the committees' effectiveness in supporting the Board of Commissioners' duties, the effectiveness of the Committee Chairman roles, and the quality of interactions and decision-making processes during each committee meeting.

Perubahan Susunan Anggota Dewan Komisaris

Selama tahun 2025, tidak terjadi perubahan komposisi Dewan Komisaris Perseroan. Hingga akhir tahun, susunan Dewan Komisaris terdiri dari 3 (tiga) orang, yaitu 1 (satu) Komisaris Utama Independen, 1 (satu) Komisaris Independen, dan 1 (satu) Komisaris Non Independen.

Seluruh anggota Dewan Komisaris merupakan profesional dengan latar belakang pendidikan, kompetensi, dan pengalaman yang beragam. Keberagaman ini diharapkan mampu memperkuat kualitas pengawasan dan memperkaya perspektif dalam pemberian nasihat strategis.

Komposisi Dewan Komisaris ditetapkan dengan mempertimbangkan kebutuhan dan kompleksitas usaha Perseroan. Penentuan anggota dilakukan berdasarkan keahlian, pengalaman profesional, dan rekam jejak, tanpa membedakan gender, suku, ras, maupun agama.

Dengan demikian, susunan Dewan Komisaris per 31 Desember 2025 adalah sebagaimana tercantum pada tabel berikut:

Changes in the Composition of the Board of Commissioners

There were no changes in the composition of the Company's Board of Commissioners during 2025. At the end of the year, the Board of Commissioners consisted of 3 (three) members: 1 (one) Independent President Commissioner, 1 (one) Independent Commissioner, and 1 (one) Non-Independent Commissioner.

All members of the Board of Commissioners are professionals with diverse educational backgrounds, competencies, and experience. This diversity is expected to strengthen the quality of oversight and enrich perspectives in providing strategic advice.

The composition of the Board of Commissioners is determined by considering the Company's business needs and complexity. Members are selected based on expertise, professional experience, and track record, regardless of gender, ethnicity, race, or religion.

Accordingly, the composition of the Board of Commissioners as of December 31, 2025, is as shown in the following table:

Nama Name	Jabatan Position
Inkawan D. Jusi	Komisaris Utama Independen Independent President Commissioner
Pramoda Dei Sudarmo	Komisaris Independen Independent Commissioner
Kreisna D. Gozali	Komisaris Commissioner

Dengan komposisi ini diharapkan semakin memperkuat fungsi pengawasan dan kualitas nasihat strategis kepada Direksi. Komposisi tersebut telah memenuhi ketentuan Bank Indonesia dan OJK, termasuk persyaratan bahwa Komisaris Independen paling sedikit 50% dari total anggota Dewan Komisaris.

This composition is expected to further strengthen the supervisory function and the quality of strategic advice provided to the Board of Directors. The composition has fulfilled the requirements of Bank Indonesia and the OJK, including the requirement that Independent Commissioners constitute at least 50% of the total members of the Board of Commissioners.

Apresiasi

Sebagai penutup, Dewan Komisaris menyampaikan terima kasih kepada para pemegang saham dan seluruh pemangku kepentingan atas kepercayaan dan dukungan yang berkelanjutan.

Penghargaan yang tulus juga kami sampaikan kepada Direksi, jajaran manajemen, dan seluruh karyawan atas dedikasi, profesionalisme, serta kerja keras dalam memperkuat kinerja dan fondasi Perseroan sepanjang tahun 2025. Kami mendorong seluruh insan Perseroan untuk terus memperkuat kolaborasi dan sinergi dengan para pemangku kepentingan demi menghadirkan layanan perbankan yang semakin berkualitas.

Ucapan terima kasih juga kami sampaikan kepada para nasabah dan mitra usaha atas kepercayaan yang diberikan kepada Bank Neo Commerce. Capaian yang diraih sepanjang 2025 menjadi pijakan penting bagi Perseroan untuk terus bertumbuh secara berkelanjutan dan memberikan nilai tambah jangka panjang.

Appreciation

To conclude this report, the Board of Commissioners would like to express its gratitude to the shareholders and all stakeholders for their continued trust and support.

We also extend our sincere appreciation to the Board of Directors, management, and all employees for their dedication, professionalism, and hard work in strengthening the Company's performance and foundation throughout 2025. We encourage all members of the Company to further strengthen collaboration and synergy with stakeholders to deliver even higher-quality banking services.

We also extend our gratitude to our customers and business partners for the trust they have placed in Bank Neo Commerce. Our achievements throughout 2025 serve as a crucial foundation for the Company to continue growing sustainably and delivering long-term value.

Jakarta, 8 April 2026
Jakarta, April 8, 2026

Atas nama Dewan Komisaris PT Bank Neo Commerce Tbk
On behalf of the Board of Commissioners of PT Bank Neo Commerce Tbk



Inkawan D. Jusi
Komisaris Utama Independen
Independent President Commissioner

Laporan Direksi
Board of Directors Report

Neo Bank memaknai nilai keberlanjutan sebagai upaya untuk menciptakan nilai jangka panjang melalui inovasi layanan, keuangan digital yang inklusif, efisien dan bertanggung jawab.

Neo Bank defines sustainability as a commitment to creating long-term value through service innovation, inclusive digital finance, and efficient as well as responsible business practices.

Para Pemegang Saham dan Pemangku Kepentingan yang Terhormat,

Kami memanjatkan puji syukur kepada Tuhan Yang Maha Kuasa atas penyertaan-Nya sehingga Perseroan mampu melalui tahun 2025 yang penuh dinamika dengan capaian yang positif. Tahun ini menjadi bukti bahwa kolaborasi yang kuat antar Divisi, Unit Kerja, dan Direktorat mampu memperkuat daya tahan Perseroan dalam menghadapi kompleksitas bisnis yang terus berkembang.

Atas nama Direksi PT Bank Neo Commerce Tbk ("Perseroan" atau "Bank"), kami menyampaikan Laporan Pengelolaan Perseroan tahun buku 2025 sebagai refleksi komitmen kami dalam menjaga kinerja, memperkuat fondasi usaha, serta memastikan keberlanjutan pertumbuhan di tengah berbagai tantangan.

Dear Esteemed Shareholders and Stakeholders,

We would like to express our deepest gratitude to God Almighty for His blessings, which have enabled the Company to navigate the dynamic year of 2025 with positive results. This year has proven that strong collaboration among Divisions, Work Units, and Directorates has strengthened the Company's resilience in facing the ever-evolving complexities of business.

On behalf of the Board of Directors of PT Bank Neo Commerce Tbk ("the Company" or "the Bank"), we present the Company's Management Report for the 2025 fiscal year as a reflection of our commitment to maintain performance, strengthen the business foundation, and ensure sustainable growth amidst various challenges.

Analisis Makroekonomi dan Industri Perbankan
Macroeconomic and Banking Industry Analysis

Pada periode pelaporan, dinamika perekonomian global masih dibayangi oleh ketidakpastian yang mempengaruhi stabilitas pasar keuangan dan sentimen investor. Ketegangan terkait kebijakan tarif, tekanan inflasi di Amerika Serikat (AS) yang melampaui target, serta

During the reporting period, dynamics in the global economy were still overshadowed by uncertainties that affected financial market stability and investor sentiment. Tensions regarding tariff policies, inflationary pressures in the United States (U.S.) that exceeded targets, and



ERI BUDIONO

Direktur Utama
President Director



pelemahan data ketenagakerjaan menjadi faktor utama yang membentuk arah pergerakan ekonomi dunia. Sejumlah negara besar seperti Inggris Raya, kawasan Eropa, dan Tiongkok mencatat perlambatan pertumbuhan pada triwulan III.

weakening labor market data were the primary factors influencing the direction of the global economy. Several major economies, including the United Kingdom, the European region, and China, recorded a slowdown in growth during the 3rd Quarter.

Perkembangan inflasi global menunjukkan pola yang beragam. AS dan Eropa menghadapi peningkatan inflasi, sementara Inggris Raya relatif stabil. Di sisi lain, Tiongkok masih berada dalam fase deflasi, meskipun terdapat indikasi perbaikan. Sebagai respons atas tekanan inflasi tersebut, The Fed menurunkan suku bunga acuannya sebesar 25 basis poin menjadi 4,00–4,25% guna menjaga keseimbangan antara stabilitas harga dan pertumbuhan ekonomi. Sementara itu, Tiongkok masih menghadapi tantangan pemulihan ekonomi yang tidak merata, termasuk tekanan di sektor properti dan kecenderungan deflasi, meskipun terdapat indikasi perbaikan secara bertahap pada permintaan domestik.

Global inflation trends showed mixed patterns. The US and Europe faced rising inflation, while the United Kingdom was relatively stable. On the other hand, China remained in a deflationary phase, although there were signs of improvement. In response to these inflationary pressures, the Fed cut its benchmark interest rate by 25 basis points to 4.00–4.25% to preserve the balance between price stability and economic growth. Meanwhile, China continued to face challenges of uneven economic recovery, including pressures in the property sector and deflationary trends, although there were indications of a gradual improvement in domestic demand.

Di tengah dinamika global tersebut, perekonomian Indonesia menunjukkan kinerja yang relatif solid. Pada triwulan IV 2025, pertumbuhan ekonomi nasional tercatat sebesar 5,39% (yoy), meningkat dibandingkan 5,04% (yoy) pada triwulan sebelumnya. Secara keseluruhan, pertumbuhan ekonomi Indonesia sepanjang tahun 2025 mencapai sekitar 5,1%, yang merupakan tingkat pertumbuhan tertinggi sejak tahun 2022. Kinerja ini didukung oleh konsumsi rumah tangga yang tetap kuat, stabilitas inflasi yang terjaga, serta kontribusi ekspor dan investasi yang tetap positif di tengah dinamika global.

Amid these global dynamics, Indonesia's economy has demonstrated relatively solid performance. In the 4th quarter of 2025, national economic growth stood at 5.39% (yoy), up from 5.04% (yoy) in the previous quarter. Overall, Indonesia's economic growth throughout 2025 was around 5.1%, marking the highest growth rate since 2022. This performance was supported by solid household consumption, maintained inflation stability, and positive contributions from exports and investment amid global dynamics.

Dari sisi stabilitas harga, inflasi Indeks Harga Konsumen (IHK) pada Desember 2025 tercatat sebesar 2,92% (yoy), masih berada dalam kisaran target Bank Indonesia sebesar 2,5±1%. Bank Indonesia juga mempertahankan BI Rate pada level 4,75% hingga akhir tahun 2025, sebagai bagian dari bauran kebijakan moneter untuk menjaga stabilitas makroekonomi sekaligus mendukung momentum pertumbuhan ekonomi domestik.

In terms of price stability, Consumer Price Index (CPI) inflation in December 2025 stood at 2.92% (yoy), still within Bank Indonesia's target range of 2.5±1%. Bank Indonesia also maintained the BI Rate at 4.75% through the end of 2025, as part of its monetary policy mix to maintain macroeconomic stability while supporting the momentum of domestic economic growth.

Kondisi makroekonomi yang relatif stabil tersebut tercermin pada kinerja industri perbankan nasional yang tetap resilien. Hingga akhir tahun 2025, pertumbuhan kredit industri perbankan mencapai sekitar 9,6% (yoy), meningkat dibandingkan kisaran 7,7% (yoy) pada triwulan III. Di sisi pendanaan, Dana Pihak Ketiga (DPK) tumbuh kuat sebesar sekitar 13,83% (yoy), mencerminkan meningkatnya kepercayaan masyarakat terhadap sistem perbankan serta penguatan basis pendanaan domestik.

These relatively stable macroeconomic conditions are reflected in the resilient performance of the national banking industry. By the end of 2025, credit growth in the banking industry reached approximately 9.6% (year-on-year), an increase compared to the 7.7% (year-on-year) range in the third quarter. On the funding side, Third-Party Funds (TPF) grew strongly by approximately 13.83% (yoy), reflecting increased public confidence in the banking system as well as the strengthening of the domestic funding base.

Dari sisi kualitas aset, industri perbankan menunjukkan perbaikan yang berkelanjutan. Rasio Non-Performing Loan (NPL) gross tercatat sekitar 2,05%, sementara NPL net berada pada 0,79%, mencerminkan risiko kredit yang tetap terkendali. Rasio Loan at Risk (LaR) juga berada pada level yang relatif terjaga sebesar 8,72%. Sementara itu, permodalan industri perbankan tetap berada pada posisi yang kuat dengan rasio Capital Adequacy Ratio (CAR) di kisaran 26%, memberikan bantalan yang memadai dalam mengantisipasi potensi risiko.

In terms of asset quality, the banking industry demonstrated consistent improvement. The gross Non-Performing Loan (NPL) ratio stood at approximately 2.05%, while the net NPL ratio was 0.79%, indicating that credit risk remained under control. The Loan at Risk (LaR) ratio also remained at a relatively stable level of 8.72%. Meanwhile, the banking industry's capital position remained strong with a Capital Adequacy Ratio (CAR) in the range of 26%, providing an adequate buffer to anticipate potential risks.

Dengan fondasi permodalan yang kuat, likuiditas yang memadai, serta kualitas aset yang terjaga, sektor perbankan nasional menunjukkan ketahanan yang solid di tengah dinamika ekonomi global. Ke depan, industri perbankan tetap dihadapkan pada tantangan eksternal, termasuk ketidakpastian arah suku bunga global, volatilitas pasar keuangan internasional, serta potensi perlambatan ekonomi di negara-negara mitra dagang utama.

With a strong capital foundation, adequate liquidity, and maintained asset quality, the national banking sector demonstrates solid resilience amid global economic dynamics. Looking ahead, the banking industry still faces external challenges, including uncertainty regarding the direction of global interest rates, volatility in international financial markets, and the potential for economic slowdowns in major trading partner countries.

Dalam konteks tersebut, penguatan manajemen risiko, peningkatan kualitas intermediasi, serta percepatan transformasi digital dan pembiayaan berkelanjutan menjadi faktor penting untuk menjaga stabilitas dan mendorong pertumbuhan industri perbankan secara berkelanjutan. Dengan fondasi yang kuat serta penerapan prinsip kehati-hatian yang konsisten, sektor perbankan nasional memiliki ruang yang cukup untuk terus mendukung pertumbuhan ekonomi Indonesia sekaligus menjaga stabilitas sistem keuangan.

In this context, the strengthening of risk management, the improvement of intermediation quality, and the acceleration of digital transformation and sustainable financing are key factors to maintain stability and drive sustainable growth in the banking industry. With a strong foundation and consistent application of the principle of prudence, the national banking sector has sufficient room to continue supporting Indonesia's economic growth while maintaining financial system stability.

Analisis Kinerja Perseroan Tahun 2025

Company Performance Analysis in 2025

Penerapan Strategi dan Kebijakan Strategis

Implementation of Strategies and Strategic Policies

Menghadapi dinamika ekonomi sepanjang 2025, Perseroan terus melakukan evaluasi atas kebijakan strategis untuk memastikan kesinambungan kinerja dan keselarasan dengan rencana jangka panjang.

In response to the economic dynamics throughout 2025, the Company continues to evaluate its strategic policies to ensure sustained performance and alignment with long-term plans.

Transformasi digital yang dimulai sejak 2019 terus dilanjutkan secara konsisten. Sepanjang 2025, Perseroan memperkaya fitur dan layanan aplikasi neobank guna meningkatkan *customer engagement* dan loyalitas nasabah. Seluruh pengembangan dilakukan dengan tetap memperhatikan praktik pengelolaan aset dan kewajiban secara *prudent*.

The digital transformation initiated in 2019 is being consistently pursued. Throughout 2025, the Company enhanced the features and services of its neobank app to boost customer engagement and loyalty. All developments were carried out while adhering to prudent asset and liability management practices.

Bank Neo Commerce terus memperkuat posisinya sebagai bank berbasis digital dengan layanan yang komprehensif. Penyesuaian model bisnis dan operasional dilakukan secara adaptif terhadap perkembangan industri keuangan dan dinamika pasar.

Produk dan layanan yang ditawarkan mencakup berbagai segmen, mulai dari individu, UMKM, hingga korporasi, termasuk layanan pembayaran melalui QRIS, layanan transaksional bisnis, dan pengelolaan *payroll*.

Dalam menjaga pertumbuhan yang sehat, Perseroan menerapkan prinsip kehati-hatian dalam penyaluran kredit, fokus pada peningkatan kualitas aset, serta menjaga pendapatan bunga dan efisiensi operasional. Strategi ini menghasilkan kinerja yang positif sekaligus memperkuat posisi Perseroan di industri perbankan dengan layanan digital.

Pelaksanaan Rencana Bisnis Bank juga diselaraskan dengan nilai dan budaya perusahaan yang berfokus pada peningkatan kualitas layanan, komitmen kepada nasabah, serta peningkatan efektivitas operasional.

Atas berbagai inisiatif strategis tersebut, Perseroan menerima sejumlah penghargaan eksternal pada tahun 2025, antara lain:
- Peringkat 3 Terbaik Bank dengan Layanan Digital [Satisfaction, Loyalty & Engagement (SLE) 2025] dari Infobank
- Peringkat 2 Performa Terbaik dalam Pelayanan Prima Bank Digital [Bank Service Excellence 2025] dari Infobank
- Perbankan Digital Populer [Disway Awards 2025] dari Disway.id

Penghargaan ini menjadi validasi atas upaya berkelanjutan Perseroan dalam menghadirkan layanan yang relevan dan berkualitas.

Peran Direksi dalam Penerapan Kebijakan Strategis

Direksi memiliki tanggung jawab utama dalam merumuskan dan mengeksekusi strategi Perseroan, yang dituangkan setiap tahun dalam Rencana Bisnis Bank (RBB) dan dilaporkan kepada OJK.

Penyusunan RBB dilakukan dengan mempertimbangkan arahan dan pengawasan Dewan Komisaris serta aspirasi pemegang saham, baik mayoritas maupun minoritas.

Bank Neo Commerce continues to solidify its position as a digital-based bank with comprehensive services. Business and operational models are adapted to align with developments in the financial industry and market dynamics.

The Bank's products and services cover various segments, starting from individuals, MSMEs, to corporations, including payment services via QRIS, business transactional services, and payroll management.

To maintain healthy growth, the Company applies the principle of prudence in credit disbursement, focuses on improving asset quality, and maintains interest income and operational efficiency. This strategy has yielded positive performance while strengthening the Company's position in the bank with digital services industry.

The implementation of the Bank's Business Plan is also aligned with the Company's values and culture, which focus on improving service quality, commitment to customers, and enhancing operational effectiveness.

For these strategic initiatives, the Company received a number of external awards in 2025, including:
- 3rd Best Bank for Digital Services [Satisfaction, Loyalty & Engagement (SLE) 2025] from Infobank
- 2nd Best Performance in Digital Bank Service Excellence [Bank Service Excellence 2025] from Infobank
- Popular Digital Banking [Disway Awards 2025] from Disway.id

These awards validate the Company's ongoing efforts to deliver relevant and high-quality services.

The Board of Directors' Role in the Implementation of Strategic Policies

The Board of Directors is primarily responsible for formulating and executing the Company's strategies, which are outlined annually in the Bank's Business Plan (RBB) and reported to OJK.

The RBB is prepared by taking into account the guidance and oversight of the Board of Commissioners as well as the aspirations of both majority and minority shareholders.

Setiap kebijakan strategis yang telah ditetapkan wajib diimplementasikan oleh seluruh Divisi sesuai tugas dan fungsinya. Direksi memastikan bahwa seluruh unit memahami peran masing-masing agar target yang telah direncanakan dapat tercapai secara optimal.

Direksi juga berperan sebagai pengambil keputusan pada tingkat strategis, termasuk dalam pengembangan produk, ekspansi bisnis, pemasaran dan penjualan, manajemen risiko, serta tata kelola perusahaan. Proses perumusan strategi diawali dengan analisis menyeluruh atas kondisi internal dan eksternal untuk memahami tantangan serta peluang yang ada, sebelum menetapkan tujuan strategis sebagai dasar kebijakan.

Seluruh proses ini mencerminkan komitmen Perseroan dalam menjunjung prinsip kehati-hatian dan penerapan *Good Corporate Governance* (GCG).

Proses Implementasi Strategi dan Kebijakan Strategis

Untuk memastikan strategi berjalan efektif, Direksi menetapkan rencana aksi yang terukur sebagaimana tertuang dalam Rencana Bisnis Bank dan Rencana Aksi Keuangan Berkelanjutan.

Kedua dokumen tersebut menjadi panduan operasional dalam memastikan bahwa setiap inisiatif strategis dilaksanakan secara terarah, terukur, dan selaras dengan tujuan jangka panjang Perseroan. Melalui pendekatan yang sistematis dan disiplin eksekusi, Direksi memastikan implementasi kebijakan tetap berada pada jalur yang tepat dan mendukung pertumbuhan berkelanjutan.

Perbandingan antara Hasil yang Dicapai dengan yang Ditargetkan

Dalam menyusun Rencana Bisnis Bank (RBB), Perseroan melakukan analisis menyeluruh terhadap kondisi pertumbuhan ekonomi dan dinamika industri perbankan. Selain itu, kajian terhadap *risk posture*, target pasar, serta potensi pasar (*market sizing & addressable market*) menjadi landasan dalam menentukan fokus strategi bisnis, proyeksi keuangan, serta penetapan target segmen.

Di tengah berbagai tantangan yang dihadapi sepanjang 2025, Perseroan tetap mampu membukukan kinerja yang relatif baik. Capaian

Every strategic policy that has been established must be implemented by all Division in accordance with their respective duties and functions. The Board of Directors ensures that all units understand their respective roles in order to optimally achieve the established targets.

The Board of Directors also serves as the decision-maker at the strategic level, particularly in product development, business expansion, marketing and sales, risk management, and corporate governance. The strategic formulation process begins with a comprehensive analysis of internal and external conditions to understand existing challenges and opportunities, followed by the establishment of strategic objectives as the foundation for policies.

This entire process reflects the Company's commitment to upholding the principle of prudence and the implementation of Good Corporate Governance (GCG).

Implementation of Strategy and Strategic Policies

To ensure strategies are implemented effectively, the Board of Directors establishes measurable action plans as outlined in the Bank's Business Plan and the Sustainable Finance Action Plan.

These two documents serve as operational guidelines to ensure that every strategic initiative is executed purposefully, measurably, and in alignment with the Company's long-term objectives. Through a systematic approach and disciplined execution, the Board of Directors ensures that policy implementation remains on the right track and supports sustainable growth.

Comparison of Actual Results vs. Targets

In preparing the Bank's Business Plan (RBB), the Company conducts a comprehensive analysis of economic growth conditions and the dynamics of the banking industry. Additionally, assessments of risk posture, target markets, and market potential (market sizing & addressable market) become a foundation in the determination of business strategy focus, financial projections, and the establishment of target segments.

Amid various challenges faced throughout 2025, the Company still managed to record relatively strong performance. These achievements were

tersebut ditopang oleh strategi utama yang berfokus pada penguatan fundamental kualitas kredit, serta optimalisasi efisiensi operasional.

supported by key strategies that focused on strengthening credit quality fundamentals, and optimizing operational efficiency.

dalam miliar Rupiah | in billion Rupiah

Keterangan Description	Target 2025 Target in 2025	Realisasi 2025 Realization in 2025
Dana Pihak Ketiga Third Party Funds	13.600	14.026
Kredit yang diberikan Loan	8.474	7.182
Laba/(Rugi) Tahun Berjalan (Sebelum Pajak) Profit/(Loss) for the Year (Before Tax)	238	564
ROA	1,33%	3,11%
KPMM/CAR	39,44%	49,07%

Dari sisi bisnis, Perseroan menerapkan pendekatan yang lebih selektif dalam penyaluran kredit guna menjaga kualitas aset tetap sehat. Pada saat yang sama, upaya perluasan pasar dan diversifikasi segmen nasabah terus dilakukan. Total kredit yang disalurkan per 31 Desember 2025 tercatat sebesar Rp7.182 miliar, menurun dibandingkan Rp8.822 miliar pada tahun sebelumnya. Penurunan ini merupakan bagian dari strategi Perseroan untuk memprioritaskan kualitas pertumbuhan dibandingkan ekspansi agresif.

Business-wise, the Company has adopted a more selective lending approach to maintain healthy asset quality. Simultaneously, the Company continues to pursue market expansion and customer segment diversification. Total lending as of December 31, 2025, stood at Rp7,182 billion, down from Rp8,822 billion in the previous year. This decline is part of the Company's strategy to prioritize quality growth over aggressive expansion.

Dari sisi pendanaan, Dana Pihak Ketiga (DPK) per 31 Desember 2025 tercatat sebesar Rp14.026 miliar, meningkat dibandingkan Rp13.064 miliar pada tahun 2024. Dengan demikian, *Loan to Deposit Ratio* (LDR) berada pada level 51,21%. Perseroan terus mendorong peningkatan dana murah (CASA) melalui pengembangan layanan *cash management* dan *payroll*, sehingga *cost of fund* berhasil ditekan.

In terms of funding, Third-Party Funds (TPF) as of December 31, 2025, stood at Rp14,026 billion, an increase from Rp13,064 billion in 2024. Consequently, the Loan to Deposit Ratio (LDR) stood at 51.21%. The Company continues to drive the growth of low-cost funds (CASA) through the development of cash management and payroll services, thereby successfully reducing the cost of funds.

Pendapatan Bunga Bersih (*Net Interest Income/ NII*) sepanjang 2025 tercatat sebesar Rp2.353 miliar, sedikit lebih rendah dibandingkan Rp2.741 miliar pada 2024. Kinerja ini sejalan dengan strategi pengelolaan kredit yang lebih selektif serta perbaikan kualitas aset, yang didukung juga oleh upaya optimalisasi pengelolaan *excess funds.*

Net Interest Income (NII) for 2025 was recorded at Rp2,353 billion, slightly lower than Rp2,741 billion in 2024. This performance is in line with a more selective credit management strategy and improvements in asset quality, further supported by efforts to optimize the management of excess funds.

Total aset Perseroan per 31 Desember 2025 tercatat sebesar Rp18.974 miliar, meningkat dibandingkan Rp17.409 miliar pada tahun sebelumnya. Meski demikian, perbaikan efisiensi operasional menunjukkan hasil yang signifikan. Rasio Beban Operasional terhadap Pendapatan Operasional (BOPO) melanjutkan perbaikan efisiensi sebesar 15,16%, dari 99,34% pada 2024 menjadi 84,18% pada 2025. Rasio *cost to income* (CIR) juga membaik menjadi 31,33% dari sebelumnya 31,47%.

The Company's total assets as of December 31, 2025, stood at Rp18,974 billion, up from Rp17,409 billion in the previous year. Nevertheless, the improvement in operational efficiency showed significant results. The Operating Expense to Operating Income Ratio (BOPO) continued to improve in efficiency by 15.16%, from 99.34% in 2024 to 84.18% in 2025. The cost to income ratio (CIR) also improved slightly to 31.33%, compared to 31.47% in the prior year.

Dari sisi likuiditas, Perseroan berada dalam posisi yang sangat memadai. *Liquidity Coverage Ratio* (LCR) tercatat sebesar 614,93% dan *Net Stable Funding* Ratio (NSFR) sebesar 278,59% keduanya jauh di atas batas minimum yang dipersyaratkan regulator.

In terms of liquidity, the Company is in a very comfortable position. The Liquidity Coverage Ratio (LCR) stood at 614.93% and the Net Stable Funding Ratio (NSFR) at 278.59%, both well above the minimum thresholds required by regulators.

Permodalan Perseroan juga tetap kuat. Rasio Kecukupan Modal (CAR) meningkat menjadi 49,07% per Desember 2025 dibandingkan 35,30% pada tahun sebelumnya. Posisi ini memberikan ruang yang cukup untuk mendukung pertumbuhan usaha secara berkelanjutan.

The Company's capital position also remained strong. The Capital Adequacy Ratio (CAR) increased to 49.07% as of December 2025 compared to 35.30% in the previous year. This position provides sufficient room to support sustainable business growth.

Secara keseluruhan, berbagai perbaikan fundamental tersebut berdampak positif terhadap kinerja Perseroan. Per 31 Desember 2025, Perseroan berhasil membukukan laba sebesar Rp565,69 miliar, meningkat dari tahun sebelumnya sebanyak Rp19,88 miliar

Overall, these fundamental improvements have positively impacted the Company's performance. As of December 31, 2025, the Company recorded a profit of Rp565.69 billion, an increase of Rp19.88 billion from the previous year

Kinerja Lainnya

Other Performance

Struktur Organisasi

Organizational Structure

Untuk memastikan tata kelola yang efektif, efisien, dan selaras dengan regulasi, Perseroan melakukan penataan ulang struktur organisasi efektif per 19 Maret 2025. Penyesuaian dilakukan untuk memenuhi ketentuan Peraturan Otoritas Jasa Keuangan Nomor 12 Tahun 2024 tentang Penerapan Strategi Anti Fraud bagi Lembaga Jasa Keuangan dan Peraturan Otoritas Jasa Keuangan Nomor 15 Tahun 2025 tentang Integritas Pelaporan Keuangan Bank, serta menyesuaikan dengan perkembangan bisnis Perseroan.

To ensure effective, efficient, and regulatory-compliant governance, the Company restructured its organizational structure, effectively on March 19, 2025. The restructuring was carried out to comply with Financial Services Authority Regulation No. 12 of 2024 on the Implementation of Anti-Fraud Strategies for Financial Services Institutions and Financial Services Authority Regulation No. 15 of 2025 on the Integrity of Bank Financial Reporting, as well as to align with the Company's business developments.

Perubahan tersebut mencakup pembentukan Divisi Anti Fraud Management serta penyesuaian Direktorat Bisnis Lending menjadi Commercial Lending dan Retail, Digital & SME Lending.

These changes include the establishment of the Anti-Fraud Management Division and the restructuring of the Lending Business Directorate into Commercial Lending and Retail, Digital & SME Lending.

Selanjutnya, per 1 Januari 2026, Perseroan kembali melakukan penyesuaian struktur organisasi guna memperkuat integrasi, meningkatkan fleksibilitas operasional, serta memastikan kesiapan dalam menghadapi dinamika industri dan mendukung keberlanjutan jangka panjang.

Furthermore, as of January 1, 2026, the Company restructured its organizational structure again to strengthen integration, enhance operational flexibility, and ensure readiness to address industry dynamics and support long-term sustainability.

Aktivitas Utama Bank di Tahun 2025

Main Activities of the Bank in 2025

Kegiatan utama Perseroan adalah menghimpun dan menyalurkan dana kepada masyarakat serta menyediakan layanan perbankan dan layanan penunjang lainnya dengan suku bunga yang kompetitif.

The Company's primary activities are mobilizing and channeling funds to the public, as well as providing banking services and other supporting services at competitive interest rates.

Dalam menjalankan fungsi intermediasi tersebut, Perseroan menawarkan berbagai produk dan layanan perbankan sebagaimana yang dijelaskan lebih lanjut dalam Bab Profil Perusahaan halaman 58.

In carrying out these intermediary functions, the Company offers a variety of banking products and services which is further explained in the Company Profile section on page 58.

Tingkat Suku Bunga Penghimpunan dan Penyediaan Dana

Sepanjang tahun 2025, Perseroan mencatat tren penurunan dan stabilitas suku bunga kredit di berbagai segmen, sejalan dengan upaya menjaga daya saing dan mendorong pertumbuhan pembiayaan yang berkualitas. Di sisi lain, suku bunga simpanan menunjukkan kecenderungan stabil hingga menurun. Secara keseluruhan, kondisi ini menggambarkan kebijakan suku bunga yang adaptif di tengah dinamika pasar.

Deposit and Lending Interest Rates

Throughout 2025, the Company recorded a trend of relatively stable trend lending interest rates across various segments, in line with efforts to maintain competitiveness and drive quality financing growth. On the other hand, deposit interest rates showed a stable to declining trend. Overall, these conditions reflect an adaptive interest rate policy amid market dynamics.

Jaringan Kerja dan Kantor Operasional

Untuk mendukung pertumbuhan dan meningkatkan kualitas layanan, khususnya layanan digital, per 31 Desember 2025 Perseroan memiliki 1 (satu) Kantor Pusat Non Operasional, 6 (enam) Kantor Cabang, 1 (satu) Kantor Cabang Pembantu, dan 3 (tiga) Kantor Fungsional Non Operasional.

Keberadaan jaringan tersebut bertujuan memperluas jangkauan layanan serta mengoptimalkan pelayanan kepada nasabah.

Operational Network and Offices

To support growth and enhance service quality, particularly digital services, as of December 31, 2025, the Company operates 1 (one) Non-Operational Head Office, 6 (six) Branch Offices, 1 (one) Sub-Branch Office, and 3 (three) Non-Operational Functional Offices.

The objective of this network is to expand service coverage and optimize customer service.

Pengembangan Sumber Daya Manusia

Perseroan berkomitmen menjadi institusi keuangan pilihan sekaligus *employer of choice* melalui pengelolaan sumber daya manusia (SDM) yang inovatif dan berkelanjutan.

Kami meyakini bahwa SDM yang kompeten, berintegritas, dan adaptif merupakan fondasi utama dalam menjaga keberlangsungan usaha serta mempercepat pencapaian visi dan misi Perseroan. Menghadapi dinamika industri perbankan yang semakin kompleks, pengelolaan talenta dilakukan secara strategis dan terencana.

Tahun 2025 menjadi momentum penting dalam penguatan transformasi budaya perusahaan guna menciptakan lingkungan kerja yang kolaboratif, adaptif, dan berorientasi pada kinerja. Transformasi budaya menjadi prioritas strategis dalam memperkuat daya saing organisasi.

Human Resource Development

The Company is committed to becoming both a preferred financial institution and an employer of choice through innovative and sustainable human resource management.

We believe that competent, integrity-driven, and adaptable human resources are the cornerstone of sustaining business operations and accelerating the achievement of the Company's vision and mission. Given the increasingly complex dynamics of the banking industry, talent management is conducted strategically and systematically.

2025 marks a critical milestone in the strengthening of the Company's cultural transformation to build a collaborative, adaptive, and performance-oriented work environment. Cultural transformation is a strategic priority in enhancing the organization's competitiveness.

Pengelolaan SDM dilaksanakan secara komprehensif melalui program pendidikan dan pelatihan formal maupun nonformal yang selaras dengan strategi bisnis. Seluruh program dirancang agar terintegrasi, efisien, dan berdampak langsung pada peningkatan kinerja.

Melalui pendekatan tersebut, Perseroan bertujuan membangun insan yang profesional, berkinerja tinggi, adaptif terhadap perubahan, serta mampu menghadirkan gagasan inovatif guna memastikan kualitas pengelolaan dan pelayanan di seluruh lini bisnis tetap optimal.

Peran Teknologi Informasi

Sepanjang tahun 2025, pengembangan Teknologi Informasi (TI) Perseroan difokuskan pada penguatan infrastruktur, peningkatan kapabilitas keamanan siber, serta penguatan kompetensi sumber daya manusia di bidang TI. Upaya ini dilakukan sejalan dengan koordinasi yang berkelanjutan bersama regulator guna memastikan kepatuhan terhadap standar yang berlaku.

Perseroan juga mendorong digitalisasi secara terstruktur melalui peningkatan kapasitas tim TI, baik melalui pelatihan teknis, nonteknis, maupun pengembangan kepemimpinan. Di sisi tata kelola, dilakukan pembaruan kerangka pengelolaan TI agar selaras dengan arah strategi bisnis Perseroan secara menyeluruh.

Langkah-langkah tersebut merupakan bagian dari strategi jangka panjang untuk memastikan kesiapan teknologi yang andal, aman, dan adaptif dalam mendukung layanan perbankan digital, sehingga nasabah dapat bertransaksi dengan nyaman dan terlindungi.

Kebijakan dalam Merespon Kendala yang Dihadapi

Tahun 2025 menghadirkan tantangan yang kompleks bagi industri perbankan nasional, termasuk Perseroan. Ketidakpastian global, perlambatan pertumbuhan di sejumlah negara maju, volatilitas nilai tukar, serta tekanan inflasi turut memengaruhi dinamika sektor keuangan.

Salah satu tantangan utama adalah menjaga efisiensi operasional di tengah kenaikan biaya akibat inflasi, tingkat suku bunga, dan fluktuasi harga energi. Untuk merespons kondisi tersebut, Perseroan menjalankan sejumlah langkah strategis, antara lain:

Human resource management is implemented comprehensively through formal and non-formal education and training programs aligned with business strategies. All programs are designed to be integrated, efficient, and have a direct impact on performance improvement.

Through this approach, the Company aims to build a professional, high-performing workforce that is adaptive to change and capable of generating innovative ideas to ensure the quality of management and service across all business lines remains optimal.

The Role of Information Technology

Throughout 2025, the Company's Information Technology (IT) development is focused on strengthening infrastructure, enhancing cybersecurity capabilities, and strengthening human resource competencies in the IT sector. These efforts are carried out in line with ongoing coordination with regulators to ensure compliance with applicable standards.

The Company also encourages a structured digitalization by enhancing the IT team's capabilities through technical and non-technical trainings, as well as leadership development. On the governance side, the IT management framework has been updated to align with the Company's overall business strategy.

These steps are part of a long-term strategy to ensure reliable, secure, and adaptive technology readiness in supporting digital banking services, so that customers can conduct transactions comfortably and securely.

Policies in Responding to Challenges Encountered

The year 2025 presents complex challenges for the national banking industry, including the Company. Global uncertainty, sluggish growth in several developed nations, exchange rate volatility, and inflationary pressures are influencing the dynamics of the financial sector.

One of the main challenges is to maintain operational efficiency amid rising costs due to inflation, tight liquidity, and energy price fluctuations. To address these conditions, the Company is implementing several strategic measures, including:

- Mengimplementasikan *end-to-end credit process* guna memperkuat manajemen risiko dan budaya risiko.
- Mendorong pertumbuhan kredit melalui diversifikasi segmen nasabah.
- Mengembangkan produk dan layanan untuk meningkatkan loyalitas (*stickiness*) nasabah.
- Mengembangkan bisnis *wealth management* melalui inovasi produk investasi.
- Memperluas kolaborasi dengan fintech, e-commerce, dan platform digital lainnya untuk memperkaya ekosistem layanan.
- Mengoptimalkan proses internal guna menekan biaya tanpa mengurangi kualitas layanan.
- Mengelola portofolio secara sehat dan memperkuat mitigasi risiko.
- Menjalankan efisiensi operasional secara disiplin dan terukur.

Perkembangan teknologi yang pesat juga mengubah perilaku nasabah yang semakin mengutamakan layanan digital. Hal ini menuntut Perseroan untuk beradaptasi secara cepat dan terus berinovasi, sekaligus memastikan standar keamanan dan perlindungan data nasabah tetap menjadi prioritas utama.

Di sisi pendanaan, tingginya *cost of fund* sepanjang 2025 masih memberikan tekanan terhadap margin, seiring dengan dinamika suku bunga yang masih relatif tinggi, meskipun Bank Indonesia telah menurunkan BI-Rate secara bertahap hingga mencapai 4,75% pada akhir 2025. Kondisi tersebut mencerminkan upaya menjaga stabilitas ekonomi dan likuiditas perbankan, sekaligus mempertahankan daya tarik simpanan nasabah di tengah kondisi pasar yang kompetitif. Ke depan, Perseroan akan terus meningkatkan porsi dana murah melalui pengembangan layanan transaksi finansial guna memperkuat loyalitas nasabah dan menurunkan biaya dana secara bertahap.

Pemanfaatan Peluang dan Prospek Usaha Tahun 2026

Industri perbankan Indonesia pada 2026 diproyeksikan tetap bertumbuh, meskipun dihadapkan pada tantangan likuiditas dan dinamika global yang belum sepenuhnya stabil. Pertumbuhan kredit diperkirakan meningkat, sejalan dengan optimisme terhadap pemulihan ekonomi.

- Implementing an end-to-end credit process to strengthen risk management and risk culture.
- Driving credit growth through customer segment diversification.
- Developing products and services to enhance customer loyalty (stickiness).
- Expanding the wealth management business through investment product innovation.
- Expanding collaborations with fintech, e-commerce, and other digital platforms to enrich the service ecosystem.
- Optimizing internal processes to reduce costs without compromising service quality.
- Managing the portfolio soundly and strengthening risk mitigation.
- Implementing operational efficiency in a disciplined and measurable manner.

Rapid technological advancements are also altering customer behavior towards a stronger preference for digital services. This condition compels the Company to adapt quickly and continuously innovate, while ensuring that security standards and customer data protection remain top priorities.

On the funding side, the high cost of funds throughout 2025 continues to put pressure on margins, in line with interest rate dynamics that remain relatively high, even though Bank Indonesia has gradually lowered the BI Rate to reach 4.75% by the end of 2025. These conditions reflect efforts to maintain economic stability and banking liquidity, while preserving the attractiveness of customer deposits amid a competitive market environment. Moving forward, the Company will continue to increase the proportion of low-cost funds through the development of financial transaction services to strengthen customer loyalty and gradually reduce funding costs.

Leveraging Opportunities and Business Prospects for 2026

The Indonesian banking industry in 2026 is projected to continue growing, despite facing liquidity challenges and global dynamics that remain unstable. Credit growth is expected to increase, in line with optimism regarding economic recovery.

Transformasi sektor perbankan diproyeksikan semakin mengarah pada:

1. **Digitalisasi**
   Digitalisasi akan menjadi pilar utama pengembangan industri. Otoritas Jasa Keuangan telah menetapkan *roadmap* transformasi digital yang mencakup penguatan infrastruktur teknologi informasi serta kolaborasi dengan perusahaan fintech.
2. **Pertumbuhan Kredit**
   Pertumbuhan kredit perbankan pada Triwulan IV 2025 tercatat sebesar 9,69% (yoy), melambat dibandingkan periode yang sama tahun sebelumnya yang tumbuh 10,39% (yoy). Perlambatan ini mencerminkan dinamika intermediasi perbankan di tengah ketidakpastian global, meskipun penyaluran kredit masih tumbuh positif dan didukung oleh sektor-sektor produktif.

Di sisi pendanaan, Dana Pihak Ketiga (DPK) tumbuh *double* digit sebesar 11,18% (yoy), meningkat dibandingkan periode yang sama tahun sebelumnya sebesar 7,04% (yoy). Likuiditas perbankan tetap terjaga dengan rasio AL/NCD sebesar 130,47% dan AL/DPK sebesar 29,30%, yang berada di atas *threshold* yang ditetapkan.

Kualitas aset juga tetap terkendali dengan rasio NPL *gross* sebesar 2,24% dan NPL net sebesar 0,87%, sementara permodalan perbankan tetap solid dengan CAR sebesar 26,15%.

Meski demikian, perlambatan pertumbuhan kredit dibandingkan tahun sebelumnya menunjukkan bahwa tantangan likuiditas, dinamika suku bunga, dan kualitas aset tetap menjadi perhatian utama industri.

Menanggapi peluang dan tantangan tersebut, Direksi menargetkan pertumbuhan kredit Perseroan pada kisaran 12%–15% dengan tetap mengedepankan kualitas aset guna menjaga rasio NPL tetap sehat. Strategi perluasan pasar dan diversifikasi segmen nasabah akan terus dilanjutkan.

Di sisi operasional, Perseroan akan memperkuat penghimpunan dana murah (CASA), pengembangan layanan payroll dan cash management, serta menjaga operasional perbankan yang sehat dan efisien.

The transformation of the banking sector is projected to increasingly focus on:

1. **Digitalization**
   Digitalization will be a key pillar of industry development. The Financial Services Authority has established a digital transformation roadmap that includes strengthening information technology infrastructure and collaboration with fintech companies.
2. **Credit Growth**
   Bank credit growth in the 4th Quarter of 2025 stood at 9.69% (yoy), slower than the same period last year, which grew by 10.39% (yoy). This slowdown reflects the dynamics of banking intermediation amid global uncertainty, although credit disbursement continues to grow positively and is supported by productive sectors.

On the funding side, Third-Party Funds (TPF) grew at a double-digit rate of 11.18% (yoy), an increase compared to the same period the previous year at 7.04% (yoy). Banking liquidity remained stable with an AL/NCD ratio of 130.47% and an AL/DPK ratio of 29.30%, both above the established thresholds.

Asset quality also remained under control with a gross NPL ratio of 2.24% and a net NPL ratio of 0.87%, while the banking sector's capital position remained solid with a CAR of 26.15%.

Nevertheless, the slowdown in credit growth compared to the previous year indicates that liquidity challenges, interest rate dynamics, and asset quality remain key concerns for the industry.

In response to these opportunities and challenges, the Board of Directors targets the Company's loans growth at 12%–15%, while prioritizing asset quality to maintain a healthy NPL ratio. Market expansion strategies and customer segment diversification will be continuously pursued.

On the operational side, the Company will strengthen the mobilization of low-cost funds (CASA), the development of payroll and cash management services, and maintain healthy and efficient banking operations.

Penerapan Tata Kelola

Dalam industri perbankan yang berbasis kepercayaan dan sangat diatur (*highly regulated*), penerapan tata kelola yang baik merupakan fondasi utama keberlangsungan usaha. Manajemen menyadari bahwa kegagalan dalam tata kelola dapat berisiko pada mismanajemen dan mengancam stabilitas Perseroan.

Good Corporate Governance (GCG) menjadi prinsip utama dalam meningkatkan kinerja, menciptakan nilai jangka panjang, serta menjaga keberlanjutan usaha. Efektivitas pelaksanaan GCG sangat ditentukan oleh berfungsinya organ-organ utama perusahaan, yaitu Rapat Umum Pemegang Saham (RUPS), Dewan Komisaris, Direksi, serta komite-komite pendukung.

Perseroan meyakini bahwa peningkatan kualitas tata kelola akan sejalan dengan peningkatan kinerja secara keseluruhan. Oleh karena itu, praktik GCG diupayakan menjadi bagian dari budaya kerja dan dijalankan secara konsisten di seluruh lini organisasi.

Sepanjang 2025, Direksi secara intensif menyelenggarakan rapat internal, rapat gabungan dengan Dewan Komisaris, serta rapat komite guna memastikan kepatuhan terhadap prinsip tata kelola dan responsif terhadap dinamika bisnis.

Penerapan tata kelola juga diperkuat melalui mekanisme *self-assessment* sebagai bagian dari sistem *check and balances*. Setiap temuan penyimpangan ditindaklanjuti secara menyeluruh untuk memastikan perbaikan yang berkelanjutan.

Komitmen terhadap Penerapan Keuangan Berkelanjutan

Penerapan Keuangan Berkelanjutan, termasuk integrasi aspek Lingkungan, Sosial, dan Tata Kelola (LST), serta komitmen terhadap Tanggung Jawab Sosial dan Lingkungan (TJSL), merupakan bagian dari strategi jangka panjang Perseroan. Inisiatif ini bertujuan menjaga keberlanjutan bisnis sekaligus memastikan kepatuhan terhadap prinsip keberlanjutan yang diakui secara global.

Sebagai bank dengan layanan digital, Perseroan menerapkan praktik *green banking* dalam operasional sehari-hari, antara lain melalui efisiensi penggunaan energi dan air, pengurangan konsumsi kertas, serta berbagai inisiatif ramah lingkungan lainnya.

Implementation of Corporate Governance

In the highly regulated banking industry, which is built on trust, the implementation of good corporate governance is the cornerstone of business sustainability. Management recognizes that failures in corporate governance can lead to mismanagement and threaten the Company's stability.

Good Corporate Governance (GCG) is a key principle in improving performance, creating long-term value, and ensuring business sustainability. The effectiveness of GCG implementation is largely determined by the proper functioning of the Company's main organs, including the General Meeting of Shareholders (GMS), the Board of Commissioners, the Board of Directors, and supporting committees.

The Company believes that improving the quality of corporate governance will result in improved overall performance. Therefore, GCG practices are integrated into the work culture and consistently implemented across all levels of the organization.

Throughout 2025, the Board of Directors intensively held internal meetings, joint meetings with the Board of Commissioners, and committee meetings to ensure compliance with governance principles and responsiveness to business dynamics.

Governance implementation is also strengthened through a self-assessment mechanism as part of the check and balances system. Any findings of non-compliance are thoroughly addressed to ensure continuous improvement.

Commitment to Sustainable Finance

The implementation of Sustainable Finance, including the integration of Environmental, Social, and Governance (ESG) aspects, as well as a commitment to Social and Environmental Responsibility (SER), is part of the Company's long-term strategy. This initiative aims to safeguard business sustainability while ensuring compliance with globally recognized sustainability principles.

As a bank that offers digital services, the Company implements green banking practices in its daily operations, including through energy and water efficiency, reduced paper consumption, and various other eco-friendly initiatives.

Selain itu, Perseroan turut berperan sebagai agen perubahan dalam meningkatkan literasi dan inklusi keuangan nasional. Pada 2025, Perseroan berpartisipasi dalam kegiatan Bulan Inklusi Keuangan yang diselenggarakan OJK di Surabaya, serta menyelenggarakan kegiatan literasi keuangan di Surabaya dan Madura. Upaya tersebut mencerminkan komitmen Perseroan dalam mendorong peningkatan literasi dan inklusi keuangan secara berkelanjutan.

Additionally, the Company serves as an agent of change in enhancing national financial literacy and inclusion. In 2025, the Company participated in the Financial Inclusion Month activities organized by the OJK in Surabaya, and conducted financial literacy programs in Surabaya and Madura. These efforts reflect the Company's commitment to promoting sustainable improvements in financial literacy and inclusion.

Perseroan meyakini bahwa keberlanjutan merupakan proses jangka panjang yang memerlukan komitmen kolektif seluruh pemangku kepentingan. Dengan merancang dan menjalankan program keberlanjutan secara terukur, Perseroan berupaya menciptakan nilai tambah tidak hanya bagi pemegang saham, tetapi juga bagi masyarakat dan lingkungan. Pendekatan ini menegaskan komitmen Perseroan dalam menjaga keseimbangan antara kinerja ekonomi, tanggung jawab sosial, dan pelestarian lingkungan.

The Company believes that sustainability is a long-term process that requires the collective commitment of all stakeholders. By designing and implementing measurable sustainability programs, the Company strives to create added value not only for shareholders but also for society and the environment. This approach underscores the Company's commitment to maintaining a balance between economic performance, social responsibility, and environmental conservation.

Penilaian terhadap Komite-Komite di Bawah Direksi

Sesuai dengan kebutuhan bisnis serta ketentuan peraturan perundang-undangan yang berlaku, Direksi membentuk komite-komite di bawah Direksi untuk mendukung pelaksanaan fungsi pengurusan. Keberadaan komite tersebut bertujuan meningkatkan efektivitas pengambilan keputusan serta memastikan operasional Perseroan berjalan secara efisien dan terkendali.

Dalam menjalankan tugasnya, Direksi dibantu oleh 8 (delapan) komite, yaitu:
1. Komite Manajemen Risiko
2. Komite Kebijakan Perkreditan
3. Komite Kredit
4. Komite Personalia
5. Komite Aset dan Liabilitas
6. Komite Pengarah Teknologi Informasi
7. Komite Kredit Bermasalah
8. Komite Produk

Direksi secara berkala melakukan evaluasi atas kinerja masing-masing komite. Sepanjang tahun 2025, Direksi menilai bahwa seluruh komite telah menjalankan peran dan tanggung jawabnya sesuai dengan tujuan pembentukannya. Penilaian tersebut didasarkan pada pelaksanaan tugas yang mengacu pada Piagam Komite, kompetensi dan keahlian anggota, capaian kinerja selama tahun berjalan, serta tingkat kehadiran dalam rapat.

Assessment of Committees Under the Board of Directors

In accordance with business needs as well as applicable laws and regulations, the Board of Directors establishes supporting committees to support the execution of management functions. The existence of these committees aims to enhance the effectiveness of decision-making and ensure the Company's operations run efficiently and appropriately.

In carrying out its duties, the Board of Directors is assisted by 8 (eight) committees, as follows:
1. Risk Management Committee
2. Credit Policy Committee
3. Credit Committee
4. HR Committee
5. Assets and Liabilities Committee
6. Information Technology Steering Committee
7. Non-Performing Loans Committee
8. Product Committee

The Board of Directors periodically evaluates the performance of each committee. Throughout 2025, the Board of Directors deemed that all committees had fulfilled their roles and responsibilities in accordance with the objectives of their establishment. This assessment was based on the execution of duties in accordance with the Committee Charters, the competence and expertise of members, performance achievements during the current year, and attendance rates at meetings.

Kepemilikan Direksi, Dewan Komisaris, dan Pemegang Saham dalam Kelompok Usaha Bank

Sebagai bagian dari komitmen terhadap transparansi dan kepatuhan, Perseroan mewajibkan setiap anggota Direksi dan Dewan Komisaris untuk melaporkan kepemilikan saham Perseroan kepada Sekretaris Perusahaan. Informasi tersebut selanjutnya disampaikan kepada Otoritas Jasa Keuangan paling lambat 3 (tiga) hari kerja sejak terjadinya transaksi kepemilikan.

Sepanjang tahun 2025, tidak terdapat anggota Direksi maupun Dewan Komisaris yang memiliki saham Perseroan secara langsung.

Share Ownership of the Board of Directors, Board of Commissioners, and Shareholders in the Bank's Business Group

As part of its commitment to transparency and compliance, the Company requires every member of the Board of Directors and the Board of Commissioners to report their share ownership in the Company to the Corporate Secretary. This information is subsequently submitted to the Financial Services Authority no later than 3 (three) business days following the transaction.

Throughout 2025, no member of the Board of Directors or Board of Commissioners held shares in the Company directly.

Perubahan Penting pada Bank dan Kelompok Usaha Bank Tahun 2025

Selama tahun 2025, tidak terdapat perubahan material pada Bank maupun kelompok usaha Bank yang berdampak signifikan terhadap kinerja keuangan maupun operasional Perseroan.

Significant Changes at the Bank and the Bank's Business Group in 2025

During 2025, there were no material changes in the Bank or the Bank's business group that significantly impacted the Company's financial or operational performance.

Perubahan Komposisi Direksi

Sepanjang tahun 2025, tidak terdapat perubahan komposisi anggota Direksi. Per 31 Desember 2025, Direksi Perseroan terdiri dari 3 (tiga) orang dengan komposisi sebagai berikut:

Changes in the Composition of the Board of Directors

Throughout 2025, there were no changes in the composition of the Board of Directors. As of December 31, 2025, the Company's Board of Directors consisted of 3 (three) members with the following composition:

Nama Name	**Jabatan** Position
Eri Budiono	Direktur Utama President Director
Aditya Wahyu Windarwo	Direktur Bisnis Business Director
Ricko Irwanto	Direktur Kepatuhan Compliance Director

Komposisi Direksi telah memenuhi ketentuan Otoritas Jasa Keuangan, di mana seluruh anggota Direksi memiliki pengalaman paling sedikit 5 (lima) tahun di bidang operasional perbankan dan pernah menjabat sekurang-kurangnya sebagai Pejabat Eksekutif bank.

The Board of Directors' composition has fulfilled the requirements of the Financial Services Authority, with all members possessing at least 5 (five) years of experience in banking operations and having previously served at least as an Executive Officer of a bank.

Apresiasi

Atas nama Direksi, kami menyampaikan terima kasih dan penghargaan kepada Dewan Komisaris atas arahan, nasihat, dan rekomendasi yang konstruktif sepanjang tahun 2025.

Apresiasi yang tulus juga kami sampaikan kepada para pemegang saham, nasabah, dan mitra usaha atas kepercayaan dan dukungan yang berkelanjutan. Ucapan terima kasih khusus kami tujukan kepada seluruh Neobanker yang telah menunjukkan dedikasi dan profesionalisme dalam menjalankan tugasnya.

Kami bersyukur dapat menutup tahun 2025 dengan capaian yang positif dan meyakini bahwa Perseroan berada pada jalur yang tepat untuk terus berkembang. Memasuki tahun 2026, kami membawa semangat baru untuk melanjutkan momentum pertumbuhan yang telah dibangun. Pencapaian tahun ini menjadi fondasi yang kuat untuk menghadapi tantangan ke depan dengan optimisme dan tanggung jawab.

Kami juga menyampaikan terima kasih kepada seluruh pemangku kepentingan atas kerja sama dan kepercayaan yang memungkinkan Perseroan menjalankan kegiatan usaha secara berkelanjutan di tengah dinamika industri yang semakin kompetitif.

Appreciation

On behalf of the Board of Directors, we would like to express our gratitude and appreciation to the Board of Commissioners for their constructive guidance, advice, and recommendations throughout 2025.

We also extend our sincere appreciation to our shareholders, customers, and business partners for their continued trust and support. Our special appreciation goes to all Neobank employees who have demonstrated dedication and professionalism in carrying out their duties.S mployee

We are grateful to have concluded 2025 with positive achievements and are confident that the Company is on the right track to continue growing. As we enter 2026, we bring a renewed spirit to sustain the growth momentum we have built. This year's achievements serve as a strong foundation to overcome future challenges with optimism and responsibility.

We would also like to express our gratitude to all stakeholders for their cooperation and trust, which have enabled the Company to conduct its business operations sustainably amidst an increasingly competitive industry landscape.

Jakarta, 8 April 2026
Jakarta, April 8, 2026

Atas nama Direksi PT Bank Neo Commerce Tbk
On Behalf of the Board of Directors of PT Bank Neo Commerce Tbk

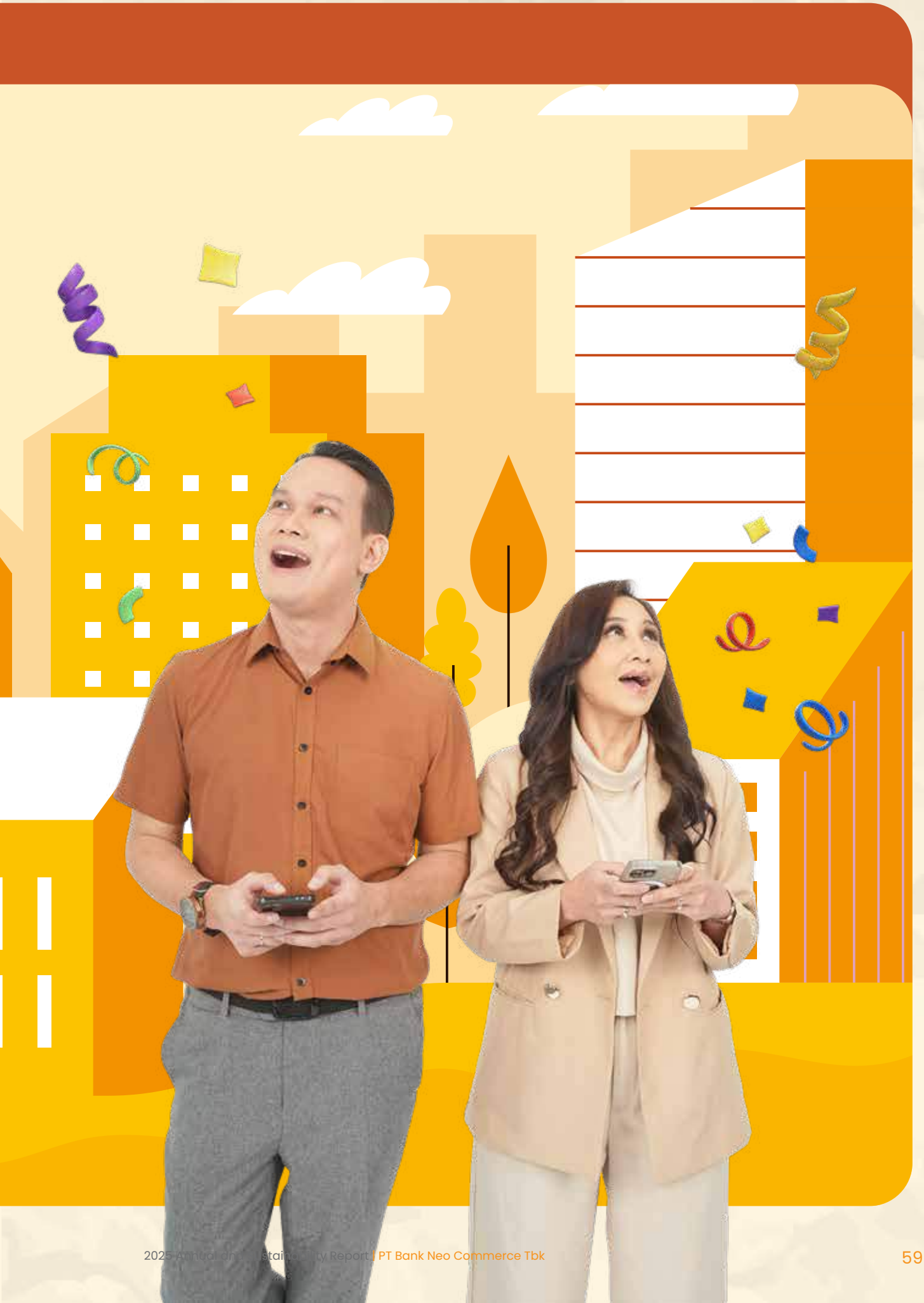


Eri Budiono
Direktur Utama
President Director



Profil Perusahaan

Company Profile



Identitas Perusahaan
Company's Identity



Nama Perusahaan Company's Name	PT Bank Neo Commerce Tbk
Bidang Usaha Business Field	Bank Umum Commercial Bank
Tanggal Pendirian Date of Establishment	19 September 1989 September 19, 1989
Dasar Hukum Pendirian Legal basis for Establishment	Akta No. 68 tanggal 19 September 1989 dibuat di hadapan Amrul Partomuan Pohan, S.H., L.LM., dan telah memperoleh pengesahan Menteri Kehakiman Republik Indonesia No. C2-10215 HT.01.01. Th'89 tanggal 7 November 1989, serta telah diumumkan dalam Berita Negara Republik Indonesia No. 99 tanggal 12 Desember 1989, Tambahan Berita Negara Republik Indonesia No. 3470/1989. Deed No. 68 dated September 19th,1989 was made before Amrul Partomuan Pohan, S.H., L.LM., and has been approved by the Minister of Justice of the Republic of Indonesia No. C2-10215 HT.01.01. Th'89 dated November 7th 1989, and has been announced in the State Gazette of the Republic of Indonesia No. 99 dated December 12th 1989, Supplement to the State Gazette of the Republic of Indonesia No. 3470/1989.
Pemegang Saham Shareholders	Per 31 Desember 2025, komposisi pemegang saham BNC adalah sebagai berikut: • PT Akulaku Silvrr Indonesia (34,45%) • PT Gozco Capital (7,76%) • Rockcore Financial Technology, Co. Ltd. (5,52%) • Masyarakat(Kepemilikan Masing-masing dibawah 5%) (52,27%) Public (Ownership of each under 5%) 52.27%
Modal Dasar Authorized Capital	Rp3.000.000.000.000



Modal Ditempatkan dan Disetor Penuh Capital Issued fully paid up	Rp1.335.048.234.600
Tanggal Pencatatan Listing Date	13 Januari 2015 January 13, 2015
Kode Saham Stock code	BBYB
Jumlah Karyawan Total Employee	933 orang per 31 Desember 2025 933 persons on December 31, 2025
Alamat Kantor Pusat Head Office Address	**Treasury Tower Lantai 60, Kawasan District 8 LOT. 28** Treasury Tower 60th Floor, District 8 Area LOT. 28 Jl. Jend Sudirman Kav. 52-53, Senayan, Kebayoran Baru Jakarta Selatan 12190 Telepon | Telephone: +62 21 2709 4950, 2709 4951
Jumlah Kantor Layanan Branches	6 Kantor Cabang dan 1 Kantor Cabang Pembantu 6 Branch Offices and 1 Sub-Branch Office
Situs Web Website	www.bankneocommerce.co.id
Alamat Surat Elektronik Email Address	corsec@bankneo.co.id
Media Sosial Perusahaan Company Social Media	Facebook : Bank Neo Commerce Instagram : @bankneocommerce Twitter : @bankneocommerce YouTube : Bank Neo Commerce TikTok : @bankneocommerce

Sejarah Singkat Perusahaan

Brief History of Company

Perjalanan PT Bank Neo Commerce Tbk ("Perseroan", "Bank Neo Commerce", atau "BNC") bermula pada tahun 1989. Pada masa itu, Dephankam bersama Perum ASABRI, Pepabri, serta para pengembang menginisiasi pendirian bank dengan nama PT Bank Yudha Bhakti. Pendirian Perseroan dituangkan dalam Akta No. 68 tanggal 19 September 1989 yang kemudian disempurnakan melalui Akta No. 13 tanggal 2 November 1989, keduanya dibuat di hadapan Amrul Partomuan Pohan, S.H., L.LM., Notaris di Jakarta. Akta pendirian tersebut memperoleh pengesahan dari Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No. C2-10215. HT.01.01.TH'89 tanggal 7 November 1989 dan diumumkan dalam Lembaran Berita Negara Republik Indonesia No. 99 tanggal 12 Desember 1989 Tambahan No. 3470/1989.

The journey of PT Bank Neo Commerce Tbk ("the Company," "Bank Neo Commerce," or "BNC") began in 1989. At that time, the Ministry of Defense and Security, together with Perum ASABRI, Pepabri, and other developers, initiated the establishment of a bank under the name of PT Bank Yudha Bhakti. The Company's establishment was formalized in Deed No. 68 dated September 19, 1989, which was subsequently amended by Deed No. 13 dated November 2, 1989; both were made before Amrul Partomuan Pohan, S.H., L.LM., a Notary in Jakarta. The deed of establishment was ratified by the Minister of Justice of the Republic of Indonesia through Decree No. C2-10215.HT.01.01.TH'89 dated November 7, 1989, and announced in the State Gazette of the Republic of Indonesia No. 99 dated December 12, 1989, Supplement No. 3470/1989.

Seiring dengan dinamika dan pertumbuhan usaha, Anggaran Dasar Perseroan mengalami sejumlah perubahan dan penyempurnaan, termasuk penyesuaian terhadap ketentuan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas serta regulasi Otoritas Jasa Keuangan. Penyesuaian tersebut dituangkan dalam Akta No. 02 tanggal 3 November 2008 yang dibuat di hadapan Pudji Rejeki Irawati, S.H., Notaris di Jakarta. Perubahan ini telah memperoleh persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui Surat Keputusan No. AHU-06842.AH.01.02.Tahun 2009 tanggal 11 Maret 2009 dan diumumkan dalam Lembaran Berita Negara Republik Indonesia No. 62 tanggal 4 Agustus 2009 Tambahan No. 20688/2009.

In line with the dynamics and growth of its business, the Company's Articles of Association have been amended and revised several times, with the aim of complying with Law No. 40 of 2007 on Limited Liability Companies and regulations issued by the Financial Services Authority. These amendments are set forth in Deed No. 02 dated November 3, 2008, made before Pudji Rejeki Irawati, S.H., a Notary in Jakarta and have been approved by the Minister of Law and Human Rights of the Republic of Indonesia through Decree No. AHU-06842.AH.01.02. 2009 dated March 11, 2009, and was announced in the State Gazette of the Republic of Indonesia No. 62 dated August 4, 2009, Supplement No. 20688/2009.

Langkah penting berikutnya ditempuh Perseroan pada 13 Januari 2015 melalui pelaksanaan Penawaran Umum Perdana (*Initial Public Offering*/"IPO"). Pada kesempatan tersebut, saham Perseroan resmi dicatatkan di Bursa Efek Indonesia dengan kode saham BBYB. Aksi korporasi ini dilaksanakan berdasarkan Surat Pemberitahuan Efektif Pernyataan Pendaftaran dalam rangka IPO saham tanggal 31 Desember 2014 No. S-584/D.04.2014 dari Otoritas Jasa

The Company took its next milestone on January 13, 2015, by conducting an Initial Public Offering ("IPO"). On the occasion, the Company's shares were officially listed on the Indonesia Stock Exchange under the ticker code BBYB. This corporate action was carried out based on the Notice of Effective Registration Statement in connection with the IPO on December 31, 2014, No. S-584/D.04.2014 from the Financial Services Authority (OJK), as well as the Indonesia Stock

Keuangan (OJK), serta Surat Bursa Efek Indonesia No. S-00082/BEI.PG1/01-2015 tanggal 8 Januari 2015 mengenai persetujuan pencatatan efek. Dengan realisasi IPO tersebut, Perseroan tercatat sebagai entitas pertama yang melantai di bursa pada tahun 2015. Sejalan dengan status barunya sebagai perusahaan terbuka, nama Perseroan disesuaikan menjadi PT Bank Yudha Bhakti Tbk guna mempertegas komitmen untuk berkompetisi di pasar modal dan memperluas pengembangan bisnis.

Exchange Letter No. S-00082/BEI. PG1/01-2015 dated January 8, 2015, regarding approval for the listing of securities. With the completion of this IPO, the Company became the first entity to go public in 2015. In line with its new status as a public company, the Company's name was changed to PT Bank Yudha Bhakti Tbk to highlight its commitment to competing in the capital market and expanding business development.

Transformasi strategis Perseroan berlanjut pada tahun 2020 melalui perubahan nama menjadi PT Bank Neo Commerce Tbk. Perubahan ini disahkan dalam Akta No. 23 tanggal 30 Juli 2020 yang dibuat dihadapan Dr. Agung Iriantoro, S.H., M.H., Notaris di Jakarta, serta memperoleh persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui Surat No. AHU-0053297.AH.01.02. Tahun 2020 tanggal 4 Agustus 2020. Selanjutnya, perubahan nama tersebut juga mendapatkan persetujuan dari Otoritas Jasa Keuangan melalui Surat OJK No. S-315/PB.12/2020 tanggal 7 September 2020 dan Salinan Keputusan OJK No. KEP-121/PB.1/2020 tanggal 2 September 2020.

The Company's strategic transformation continued in 2020 by changing its name to PT Bank Neo Commerce Tbk. This change was ratified in Deed No. 23 dated July 30, 2020, made before Dr. Agung Iriantoro, S.H., M.H., Notary in Jakarta, and received approval from the Minister of Law and Human Rights of the Republic of Indonesia via Letter No. AHU-0053297.AH.01.02. 2020 dated August 4, 2020. Furthermore, the name change also received approval from the Financial Services Authority through OJK Letter No. S-315/PB.12/2020 dated September 7, 2020, and a copy of OJK Decision No. KEP-121/PB.1/2020 dated September 2, 2020.

Perseroan kembali melakukan perubahan Anggaran Dasar sebagaimana tercantum dalam Akta No. 2 tanggal 11 Maret 2026 yang dibuat dihadapan Dr. Agung Iriantoro, S.H., M.H., Notaris di Jakarta. Perubahan tersebut telah memperoleh (i) persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui surat keputusan nomor AHU-0016988.AH.01.02.Tahun 2026 tanggal 12 Maret 2026, dan (ii) penerimaan pemberitahuan perubahan data Perseroan sesuai surat nomor AHU-AH.01.03-0077627 tanggal 12 Maret 2026.

On July 27, 2023, the Company made another amendment to its Articles of Association as set forth in Deed No. 2 dated March 11, 2026, executed before Dr. Agung Iriantoro, S.H., M.H., Notary in Jakarta. The amendments have received (i) approval from the Minister of Law and Human Rights of the Republic of Indonesia via decision letter No. AHU-0016988.AH.01.02. 2026 dated March 12, 2026, and (ii) acceptance of the notification of changes to the Company's data as per letter No. AHU-AH.01.03-0077627 dated March 12, 2026.

Melalui rangkaian perjalanan dan transformasi tersebut, Perseroan terus memperkuat fondasi kelembagaan dan tata kelola sebagai bank yang adaptif, relevan, dan berkomitmen pada penciptaan nilai berkelanjutan bagi seluruh pemangku kepentingan.

Through this journey and transformation, the Company continues to strengthen its institutional foundations and governance as a bank that is adaptive, relevant, and committed to creating sustainable value for all stakeholders.

Visi, Misi, dan Tata Nilai Perusahaan

Vision, Mission and Corporate Values

Satu Bank Banyak Tujuan

One Bank, Many Purposes



Visi

Vision



Menjadi bank yang menghadirkan cara baru dalam mengelola keuangan, lebih praktis, lebih cepat, lebih aman, dan selaras dengan kehidupan generasi modern yang progresif. Kami mendorong literasi dan kolaborasi untuk membangun masa depan finansial yang inklusif, berdaya, dan berkelanjutan.

To become a bank that introduces a more practical, faster, and safer way of managing finances, aligned with the needs and lifestyles of a progressive modern generation. Bank Neo Commerce aims to strengthen financial literacy and collaboration to build an inclusive, empowered, and sustainable financial future through technology-enabled banking services.

Misi

Mission



- **Menghadirkan layanan perbankan digital yang mudah diakses oleh masyarakat di seluruh Indonesia.**
  To provide banking services with digital capabilities that are accessible to communities across Indonesia.
- **Mengedukasi masyarakat tentang literasi keuangan, investasi, dan pengelolaan keuangan pribadi melalui teknologi digital interaktif.**
  To enhance public understanding of financial literacy, investment, and personal financial management through interactive digital platforms.
- **Menyediakan layanan keuangan berbasis teknologi AI dan big data yang efisien, mudah, sesuai kebutuhan pengguna, dan aman.**
  To deliver banking services supported by AI and big data that are efficient, secure, and tailored to customer needs.
- **Memberikan layanan keuangan yang mendukung pertumbuhan ekonomi kerakyatan melalui akses modal, pembiayaan mikro, pinjaman usaha, dan ekosistem transaksi digital**
  To support inclusive economic growth by expanding access to capital, microfinance, business financing, and a digital transaction ecosystem.
- **Mengembangkan layanan berbasis prinsip ESG dan berkolaborasi dengan pemangku kepentingan untuk mewujudkan masa depan berkelanjutan.**
  To develop banking services aligned with ESG principles and collaborate with stakeholders to promote long-term sustainability.

Nilai dan Budaya Perusahaan

Corporate Value and Culture

Transparent

Menjunjung tinggi etika, kejujuran, transparansi, dan kepatuhan terhadap regulasi perbankan untuk membangun kepercayaan dengan nasabah, mitra, dan pemangku kepentingan.

Upholding integrity, transparency, ethical standards, and compliance with banking regulations to build trust with customers, partners, regulators, and other stakeholders.

Responsive

Cepat beradaptasi dengan perubahan, tanggap terhadap kebutuhan nasabah dan rekan kerja yang beragam, demi menghadirkan layanan finansial digital yang inovatif dan relevan dengan kebutuhan zaman.

Adapting swiftly to changes and responding proactively to customer and internal needs in order to deliver relevant and reliable banking services.

User-Centric

Berfokus pada kebutuhan nasabah dari berbagai segmen, mendengarkan aspirasi mereka, serta memberikan pengalaman layanan perbankan yang mudah, aman, dan nyaman.

Placing customers at the center by understanding their needs, listening to feedback, and delivering simple, secure, and convenient banking experiences.

Synergy

Berkomitmen untuk kolaborasi dengan regulator, mitra, komunitas, dan ekosistem digital, menghargai keberagaman perspektif untuk memperluas inklusi keuangan.

Fostering collaboration with regulators, partners, communities, and the broader digital ecosystem while valuing diverse perspectives to expand financial inclusion.

Technology & Sustainability

Memanfaatkan teknologi terkini dengan prinsip keberlanjutan untuk mendukung keuangan hijau dan masa depan berkelanjutan

Utilizing technology responsibly to strengthen banking services while supporting sustainable finance, environmental responsibility, and long-term resilience.

Kegiatan dan Bidang Usaha

Lines of Business and Activities



Kegiatan Usaha Berdasarkan Anggaran Dasar

Anggaran Dasar Perseroan yang terakhir berlaku menegaskan bahwa PT Bank Neo Commerce Tbk didirikan dengan tujuan utama menjalankan kegiatan usaha di bidang jasa perbankan, sesuai dengan ketentuan peraturan perundang-undangan yang berlaku. Untuk mewujudkan tujuan tersebut, Perseroan memiliki kewenangan untuk melaksanakan berbagai aktivitas usaha perbankan, antara lain:

1. Menghimpun dana dari masyarakat dalam bentuk simpanan, termasuk giro, deposito berjangka, sertifikat deposito, tabungan, dan/atau bentuk lain yang dipersamakan dengannya;
2. Menyalurkan kredit kepada nasabah;
3. Menerbitkan surat pengakuan utang;
4. Melakukan transaksi pembelian, penjualan, atau penjaminan atas risiko sendiri maupun atas perintah nasabah terkait:
   a. Surat wesel, termasuk wesel yang diakseptasi oleh Perseroan, dengan jangka waktu yang lazim dalam praktik perdagangan;
   b. Surat pengakuan utang dan kertas dagang lainnya dengan jangka waktu sesuai kebiasaan pasar;
   c. Kertas perbendaharaan negara dan surat jaminan pemerintah;
   d. Sertifikat Bank Indonesia (SBI);
   e. Obligasi;
   f. Surat dagang dengan jangka waktu hingga 1 (satu) tahun;

Business Activities based on the Articles of Association

The Company's most recent Articles of Association state that PT Bank Neo Commerce Tbk was established with the primary objective of conducting business activities in the field of banking services based on the applicable laws and regulations. To achieve this objective, the Company has the authority to carry out various banking business activities, including:

1. Collecting funds from the public in the form of deposits, including current accounts, time deposits, certificates of deposit, savings accounts, and/or other forms deemed equivalent thereto;
2. Extending loans to customers;
3. Issuing promissory notes;
4. Conducting transactions for the purchase, sale, or guarantee of risks, either on its own account or at the instruction of customers, regarding:
   a. Bills of exchange, including those accepted by the Company, with terms customary in commercial practice;
   b. Promissory notes and other commercial paper with terms customary in market practice;
   c. Government securities and government guarantees;
   d. Bank of Indonesia Certificates (SBI);
   e. Bonds;
   f. Commercial paper with a maturity of up to 1 (one) year;

g. Instrumen surat berharga lainnya dengan jangka waktu sampai dengan 1 (satu) tahun;
5. Melakukan pemindahan dana, baik untuk kepentingan Perseroan sendiri maupun nasabah;
6. Menempatkan dana pada bank lain, meminjam dana dari bank lain, atau memberikan pinjaman kepada bank lain, baik melalui sarana telekomunikasi maupun menggunakan instrumen pembayaran lainnya;
7. Menerima pembayaran atas tagihan surat berharga serta melakukan perhitungan dengan atau antar pihak ketiga;
8. Menyediakan fasilitas penyimpanan barang dan surat berharga;
9. Menyelenggarakan kegiatan penitipan untuk kepentingan pihak lain berdasarkan perjanjian;
10. Menempatkan dana nasabah kepada nasabah lainnya dalam bentuk surat berharga yang tidak diperdagangkan di bursa efek;
11. Melakukan pembelian agunan melalui mekanisme lelang, baik sebagian maupun seluruhnya, dalam hal debitur tidak memenuhi kewajibannya, dengan ketentuan agunan tersebut harus segera dicairkan;
12. Melaksanakan kegiatan transaksi valuta asing sesuai dengan ketentuan Bank Indonesia;
13. Menjalankan kegiatan anjak piutang, usaha kartu kredit, serta wali amanat;
14. Melakukan penyertaan modal pada bank atau perusahaan lain di sektor keuangan, termasuk sewa guna usaha, modal ventura, perusahaan efek, asuransi, serta lembaga kliring, penyelesaian, dan penyimpanan, sesuai ketentuan yang berlaku;
15. Melaksanakan penyertaan modal sementara untuk mengatasi dampak kegagalan kredit dengan kewajiban menarik kembali penyertaan tersebut sesuai regulasi; dan
16. Bertindak sebagai pendiri dan pengelola dana pensiun sesuai dengan ketentuan peraturan perundang-undangan di bidang dana pensiun.

Selain kegiatan utama tersebut, Perseroan juga dapat menjalankan aktivitas lain yang terkait dan mendukung kegiatan usaha inti, sepanjang tidak bertentangan dengan peraturan perundang-undangan yang berlaku.

g. Other securities with a maturity of up to 1 (one) year;
5. Transferring funds, whether for the Company's interests or for customers;
6. Placing funds with other banks, borrowing funds from other banks, or extending loans to other banks, whether through telecommunications or other payment instruments;
7. Receiving payments on securities invoices and conducting settlements with or between third parties;
8. Providing storage facilities for goods and securities;
9. Conducting custody activities on behalf of other parties based on agreements;
10. Placing customer funds with other customers in the form of securities that are not traded on the stock exchange;
11. Purchasing collateral through an auction, either in part or in full, in the event the debtor fails to fulfill their obligations, provided that such collateral must be liquidated immediately;
12. Conducting foreign exchange transactions in accordance with Bank Indonesia regulations;
13. Conducting factoring activities, credit card businesses, and acting as a trustee;
14. Making equity investments in banks or other companies within the financial sector, including leasing, venture capital, securities firms, insurance, as well as clearing, settlement, and custody institutions, in accordance with applicable regulations;
15. Making temporary equity investments to mitigate the impact of credit defaults, with the obligation to withdraw such investments in accordance with regulations; and
16. Acting as a founder and manager of pension funds in accordance with the provisions of laws and regulations in the field of pension funds.

In addition to these main activities, the Company may also carry out other related activities that support its core business activities, provided they do not violate the applicable laws and regulations.

Jejak Langkah
Milestones



1989

Perseroan didirikan dengan nama PT Bank Yudha Bhakti atas inisiatif Dephankam, Perum ASABRI, Pepabri, dan para pengembang, dengan latar belakang kebijakan PAKTO 27/1988. Berdasarkan Persetujuan Prinsip Menteri Keuangan pada 14 Agustus 1989, Bank ini resmi beroperasi pada 9 Januari 1990.
The company was established under the name of PT Bank Yudha Bhakti on the initiative of the Ministry of Defense, Perum ASABRI, Pepabri, and developers, with the background of the PAKTO 27/1988 policy. Based on the Principle Approval of the Minister of Finance on August 14, 1989, the Bank officially operated on January 9, 1990.

1998

Di tengah krisis moneter yang melanda Indonesia pada tahun 1997, Bank Yudha Bhakti berhasil bertahan dan memanfaatkan peluang yang ada. Pada awalnya, kepemilikan Bank berada di bawah Induk Koperasi dan Pusat Koperasi di lingkungan TNI/POLRI serta Dephankam. Keberhasilan tersebut membawa Bank Yudha Bhakti meraih pengakuan sebagai Bank kategori "A".
In the midst of the monetary crisis that hit Indonesia in 1997, Bank Yudha Bhakti managed to survive and take advantage of the opportunities that existed. Initially, the Bank's ownership was under the Parent Cooperative and Cooperative Center within the TNI/POLRI and Dephankam. This success brought Bank Yudha Bhakti recognition as a category "A" Bank.

2001

Perseroan memulai ekspansi berkelanjutan dengan membuka Kantor Cabang dan Kantor Cabang Pembantu di berbagai wilayah di Jawa dan Sumatera untuk memperluas jangkauan layanan perbankan.
The Company began continuous expansion by opening Branch Offices and Sub-Branch Offices in various regions in Java and Sumatra to expand the reach of banking services.

2015

Pada 13 Januari 2015, Perseroan resmi menjadi perusahaan terbuka dengan mencatatkan sahamnya di Bursa Efek Indonesia dan melaksanakan Penawaran Umum Perdana (Initial Public Offering/IPO).
On January 13, 2015, the Company officially became a public company by listing its shares on the Indonesia Stock Exchange and carrying out an Initial Public Offering (IPO).

2019

Perseroan memulai era baru setelah lebih dari tiga dekade melayani masyarakat dengan produk perbankan konvensional. PT Akulaku Silvrr Indonesia masuk menjadi Pemegang Saham Perseroan. pada tahun yang sama Perseroan melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu (PMTHMETD) dimana Penambahan Modalnya dilakukan oleh PT Akulaku Silvrr Indonesia
The Company began a new era after more than three decades of serving the community with conventional banking products. PT Akulaku Silvrr Indonesia became a Shareholder of the Company. In the same year, the Company carried out a Capital Increase Without Pre-emptive Rights (PMTHMETD) where the Capital Increase was carried out by PT Akulaku Silvrr Indonesia

2020

- **Perseroan berkomitmen menjadi Bank Retail berbasis Digital untuk memenuhi kebutuhan nasabah, terutama di segmen Milenial.**
- **Pada 18 September 2020, Perseroan memperoleh status sebagai Bank Umum Kegiatan Usaha (BUKU) II.**
- **Nama Perseroan diubah dari PT Bank Yudha Bhakti Tbk menjadi PT Bank Neo Commerce Tbk (BNC) untuk merepresentasikan transformasi menjadi Bank dengan layanan Digital.**
- The Company is committed to becoming a Digital-based Retail Bank to meet customer needs, especially in the Millennial segment.
- On September 18, 2020, the Company obtained the status of a Commercial Bank with Business Activities (BUKU) II.
- The Company's name was changed from PT Bank Yudha Bhakti Tbk to PT Bank Neo Commerce Tbk (BNC) to represent the transformation into a Bank with Digital services.

2021

- **Bank Neo Commerce memindahkan kantor pusatnya ke Treasury Tower, SCBD, Jakarta, sebagai langkah strategis mendukung pengembangan bisnis.**
- **Aplikasi Neobank diluncurkan dan berhasil menarik 13 juta pengguna hingga akhir 2021, mencerminkan keberhasilan inovasi digital Perseroan.**
- **PT Akulaku Silvrr Indonesia ditetapkan sebagai Pemegang Saham Pengendali untuk memperkuat struktur kepemilikan Bank Neo Commerce.**
- Bank Neo Commerce moved its head office to Treasury Tower, SCBD, Jakarta, as a strategic step to support business development.
- The Neobank application was launched and successfully attracted 13 million users by the end of 2021, reflecting the success of the Company's digital innovation.
- PT Akulaku Silvrr Indonesia was appointed as the Controlling Shareholder to strengthen the ownership structure of Bank Neo Commerce.

2022

Bank Neo Commerce berhasil memenuhi ketentuan modal inti minimum sebesar Rp3 triliun melalui mekanisme Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) VI.
Bank Neo Commerce has successfully met the minimum core capital requirement of IDR 3 trillion through the Capital Increase with Pre-emptive Rights (PMHMETD) VI mechanism.

2024

Melakukan penambahan modal melalui PMHMETD VII, guna menunjang pengembangan bisnis Perseroan.
Conducting additional capital through PMHMETD VII, to support the Company's business development.

2025

Kinerja Bank Neo Commerce mengalami peningkatan yang terlihat dari:
- **mencatatkan laba bersih sebesar Rp566 miliar, pencapaian tahun pertama mencatatkan laba dalam kinerja Perseroan setahun penuh, meningkat pesat dari laba bersih tahun 2024 Rp20 miliar.**

Bank Neo Commerce's performance showed significant improvement as reflected in the following:
- Recorded a net profit of IDR 566 billion – marking its first full year of profitability, a sharp increase from the 2024 net profit of IDR 20 billion.



Produk dan Layanan

Products and Services



Sebagai salah satu bank yang berada di garis depan pengembangan layanan perbankan digital di Indonesia, BNC berkomitmen memperluas akses layanan keuangan melalui penyediaan solusi perbankan digital yang inklusif. Komitmen ini diwujudkan dengan menghadirkan rangkaian produk dan layanan yang semakin beragam dan inovatif, guna menjawab kebutuhan nasabah dari segmen individu, korporasi, hingga UMKM.

Pengembangan layanan digital BNC didukung oleh pemanfaatan teknologi mutakhir seperti *cloud computing*, *big data*, dan kecerdasan buatan. Pemanfaatan teknologi tersebut dirancang untuk memastikan pengalaman bertransaksi yang aman, mudah, dan nyaman, kapanpun dan dimanapun. Dengan pendekatan ini, BNC mendorong nasabah untuk tidak hanya memanfaatkan layanan tabungan dan investasi, tetapi juga beralih menggunakan berbagai solusi perbankan digital yang lebih komprehensif, sehingga BNC menjadi pilihan utama layanan perbankan digital masyarakat.

As one of the leading banks in the development of digital banking services in Indonesia, BNC is committed to expand access to financial services by providing inclusive digital banking solutions. This commitment is realized by offering a diverse and innovative range of products and services to meet the needs of customers across the individual, corporate, and MSME segments.

The development of BNC's digital services is supported by the use of advanced technologies, such as cloud computing, big data, and artificial intelligence. The use of these technologies is designed to ensure a secure, easy, and convenient transaction experience, anytime and anywhere. With this approach, BNC encourages customers not only to utilize savings and investment services but also to transition to more comprehensive digital banking solutions, thereby positioning BNC as the public's top choice for digital banking services.

Hingga 31 Desember 2025, produk dan layanan yang ditawarkan BNC mencakup:

As of December 31, 2025, the products and services offered by BNC include:

Produk Simpanan Digital
Digital Savings Products

- Tabungan Reguler | Regular Savings
- Tabungan NOW | NOW Savings
- Tabungan Neo Green | Neo Green Savings
- Tabungan Neo Wish | Neo Wish Savings
- Rekening Bisnis | Business Savings
- Deposito WOW | WOW Time Deposits
- Deposito Flexi | Flexi Time Deposits

Produk Simpanan *Offline* (melalui kantor cabang)
Offline Savings Products (via branch offices)

- Tabungan Reguler | Regular Savings
- Tabungan Prima | Prima Savings
- Giro Reguler | Regular Giro
- Deposito Berjangka | Time Deposit

Produk Pinjaman
Loan Products

- Neo Pinjam | Neo Loan
- Pinjaman Konsumtif | Consumer Loan
- Pinjaman Institusi Keuangan | Financial Institution Loan
- Pinjaman UMKM | MSME Loan
- Pinjaman Komersial/Perusahaan | Commercial/Corporate Loan

Produk *Wealth Management*
Produk Wealth Management

- Reksa Dana | Mutual Funds
- *Bancassurance*

Corporate Internet Banking
Corporate Internet Banking

- Rekening Giro Reguler
  Regular Current Account
- Deposito Berjangka
  Online Time Deposit
- *Payroll Services*
- *Bill Payment*

Layanan
Services

- Layanan Tagihan & Isi Ulang
  Bills & Top Up
- Layanan Emas Digital | Digital Gold Services
- Layanan Remitansi Outgoing |
  Outgoing Remittance Services
- Layanan Donasi Digital |
  Digital Donation Services
- Layanan Tarik Tunai Tanpa Kartu (CCW) |
  Cardless Cash Withdrawal (CCW)

Produk Acquiring, Pembayaran & Transfer
Acquiring, Payment & Transfer Services

- QRIS *Payment*
- QRIS *Acquiring*
- *Virtual Account Acquiring*
- *Transfer* BI-*Fast*
- *Transfer* RTOL
- *Transfer* RTGS
- *Transfer* SKN

Produk *Application Programming Interface* (API)

- API QRIS *Acquiring*
- API *Virtual Account*
- API *Direct Debit*
- API *Loan Channeling*
- API *Disbursement*

Wilayah Operasional
Operational Area

Dalam rangka meningkatkan kualitas layanan dan memperluas kemudahan akses bagi nasabah, BNC melakukan:

- Relokasi Kantor Cabang Pembantu Pantai Indak Kapuk (PIK) yang efektif pada 15 September 2025
- Relokasi Kantor Cabang Medan yang efektif pada 22 September 2025
- Penutupan Kantor Cabang Semarang yang efektif pada 12 Desember 2025

In order to improve service quality and expand accessibility for customers, BNC carried out the following:

- Relocation of the Pantai Indah Kapuk (PIK) Sub-Branch, effective as of September 15, 2025
- Relocation of the Medan Branch, effective as of September 22, 2025
- Closure of the Semarang Branch, effective as of December 12, 2025



Hingga 31 Desember 2025, Perseroan menjalankan operasional di 5 (lima) Provinsi dengan dukungan 6 kantor cabang yaitu Kantor Cabang Utama (KCU) serta kantor cabang yang berlokasi di Surabaya, Bandung, Medan, Makassar, dan Malang. Selain itu, Perseroan juga mengelola 1 (satu) Kantor Cabang Pembantu (KCP), yaitu KCP Pantai Indah Kapuk.

Untuk memberikan gambaran yang lebih komprehensif mengenai cakupan wilayah operasional, Perseroan menyajikan infografis peta sebaran layanan yang menunjukkan provinsi yang dilayani, lokasi Kantor Cabang Utama, kantor cabang di kota-kota besar, serta Kantor Cabang Pembantu.

As of December 31, 2025, the Company operates in 5 (five) provinces with the support of 6 branch offices, including the Main Branch Office (KCU) and branch offices in Surabaya, Bandung, Medan, Makassar, and Malang. In addition, the Company also manages 1 (one) Sub-Branch Office (KCP), the Pantai Indah Kapuk KCP.

To provide a more comprehensive overview of its operational coverage, the Company presents a service distribution map infographic showing the provinces served, the location of the Main Branch Office, Branch Offices and Sub-Branch Offices in major cities.



Keanggotaan dalam Asosiasi

Membership in Association

Hingga akhir tahun 2025, BNC tetap aktif berpartisipasi dalam berbagai asosiasi yang relevan dengan kegiatan usahanya. Melalui keanggotaan tersebut, Perseroan berupaya untuk senantiasa mengikuti perkembangan isu terkini di industri perbankan, sekaligus membuka ruang kolaborasi, pertukaran informasi, dan kontribusi positif bagi kemajuan bersama. Rincian keanggotaan BNC dalam berbagai asosiasi disajikan pada tabel berikut:

Until the end of 2025, BNC remains active as a member of various associations relevant to its business activities. Through these memberships, the Company strives to keep abreast of current developments in the banking industry, while also fostering opportunities for collaboration, information exchange, and positive contributions toward shared progress. Details of BNC's membership in various associations are presented in the following table:

Nama Asosiasi Association Name	Cakupan Asosiasi Association Scope	Status
Perhimpunan Bank Umum Nasional (Perbanas) National Commercial Bank Association (Perbanas)	Nasional National	Pengurus Pengurus
Asosiasi Sistem Pembayaran Indonesia (ASPI) Indonesian Payment System Association (ASPI)	Nasional National	Anggota Member
Lembaga Alternatif Penyelesaian Sengketa Sektor Jasa Keuangan (LAPS SJK) Alternative Institution for Financial Services Sector Dispute Resolution (LAPS SJK)	Nasional National	Anggota Member
Asosiasi Emiten Indonesia (AEI) Association of Indonesian Emiten (AEI)	Nasional National	Anggota Member
Indonesia Corporate Secretary Association (ICSA) Indonesiaan Corporate Secretary Association (ICSA)	Nasional National	Anggota Member
Forum Komunikasi Direktur Kepatuhan Perbankan (FKDKP) Banking Compliance Director Communication Forum (FKDKP)	Nasional National	Pengurus
Forum Komunikasi Direktur Operasional Perbankan (FKDOP) Banking Operational Director Communication Forum (FKDOP)	Nasional National	Anggota Member

Perubahan Signifikan pada Organisasi

Sepanjang tahun 2025 terdapat perubahan dalam struktur organisasi Perseroan, namun demikian perubahan tersebut tidak berdampak signifikan terhadap keberlangsungan usaha maupun kegiatan operasional Perseroan.

Significant Changes in the Organization

Throughout 2025, there were some changes to the Company's organizational structure, although not significant to the Company's business continuity or activities.

Informasi Alamat Kantor Pusat, Cabang, dan Lainnya

Information on Head Office, Branch Office, and Others

Perseroan memiliki jaringan kantor yang mendukung kegiatan operasional dan fungsi pendukung bisnis, yang terdiri atas:

The Company has an office network that support its operational activities and business support functions, consisting of:

Kantor Pusat
Head Office

Nama Kantor Office Name	Provinsi Province	Alamat Address	No. Telepon Telephone Number
Kantor Pusat Non-Operasional (KPNO) Non-Operational Head Office (KPNO)	DKI Jakarta	Treasury Tower Lt. 60 District 8 SCBD Lot 28 Jl. Jendral Sudirman Kav 52-53 Jakarta Selatan	(021) 27094950 (021) 27094951

Kantor Cabang
Branch Office

Nama Kantor Office Name	Provinsi Province	Alamat Address	No. Telepon Telephone Number
Kantor Cabang Utama (KCU) Main Branch Office (KCU)	DKI Jakarta	Gedung Gozco lt. 1 Jl. Raya Pasar Minggu Kav. 32, Pancoran, Jakarta Selatan.	(021) 29752975 (021) 29752900
Kantor Cabang Bandung Bandung Branch Office	Jawa Barat	Jl. Lombok No. 32, Bandung	(022) 4261626
Kantor Cabang Surabaya Surabaya Branch Office	Jawa Timur	Jl. Raya Darmo No. 34 Dr. Soetomo, Kec. Tegalsari, Surabaya, Jawa Timur 60264	(031) 5613588
Kantor Cabang Medan Medan Branch Office	Sumatera Utara	Jl. Glugur No.71A/1 (Jl. Gatot Subroto), Kel. Petisah Tengah, Medan	(061) 44027077
Kantor Cabang Malang Malang Branch Office	Jawa Timur	Jl. Raden Intan No. 74 Kelurahan Arjosari, Kecamatan Blimbing, Kota Malang	(0341) 4373 222
Kantor Cabang Makassar Makassar Branch Office	Sulawesi Selatan	Jl. Karunrung No. 1E, Makassar	(0411) 8944855

Kantor Cabang Pembantu
Sub-Branch Office

Nama Kantor Office Name	Provinsi Province	Alamat Address	No. Telepon Telephone Number
Kantor Cabang Pembantu Pantai Indah Kapuk Pantai Indah Kapuk Sub - Branch Office	DKI Jakarta	Jalan Pantai Indah Utara II, The Plaza, Blok 9 No. AH Pantai Indah Kapuk, Jakarta Utara	(021) 30010515

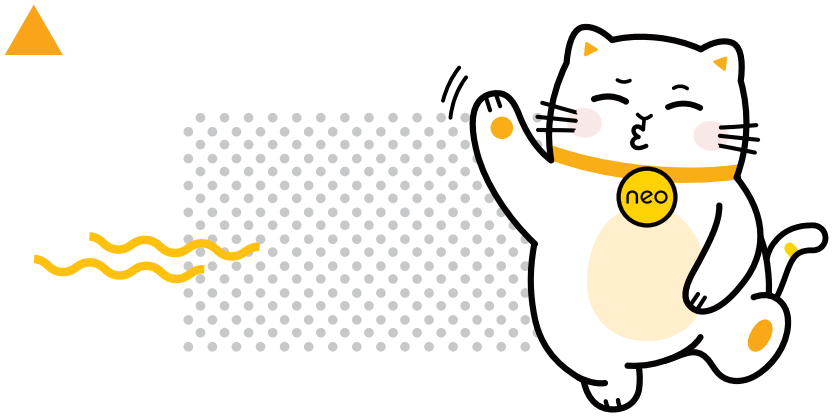
Kantor Fungsional Non Operasional
Functional Non-Operational Office

Nama Kantor Office Name	Provinsi Province	Alamat Address
KF Non Operasional KF Non Operational	DKI Jakarta	Gedung Pacific Century Place Jl. Jend.Sudirman kav 52-53 Lot 10 (lantai 23) Senayan, Jakarta Selatan
KF Non Operasional KF Non Operational	DKI Jakarta	Graha Permata Pancoran Blok C11-12, C15-C16, Jl. Raya Pasar Minggu No. 1 RT1/RW.4, Pancoran, Kec. Pancoran, Kota Jakarta Selatan
KF Non Operasional KF Non Operational	Daerah Istimewa Yogyakarta	Jl. Kranji No.91, Randuguang, Sariharjo, Kec.Sleman, Kabupaten Sleman, Daerah Istimewa Yogyakarta

ATM
ATM

Nama Kantor Office Name	Provinsi Province	Alamat Address
ATM Kantor Cabang Utama (KCU)	DKI Jakarta	Gedung Gozco Lantai 1 Jl Raya Pasar Minggu Kav 32 Pancoran Jakarta Selatan
ATM Jakarta	DKI Jakarta	Graha Permata Pancoran Blok C11-12, C15-16, Jl. Pasar Minggu No. 1, RT.1/RW.4, Jakarta Selatan
ATM KCP PIK	DKI Jakarta	Jalan Pantai Indah Utara II, The Plaza, Blok 9 No. AH Pantai Indah Kapuk, Jakarta Utara
ATM KC Bandung	Jawa Barat	Jl. Lombok No. 32, Bandung Jl. Lombok No. 32, Bandung
ATM KC Surabaya	Jawa Timur	Jl. Raya Darmo No. 34, Dr. Soetomo, Kec. Tegalsari, Surabaya, Jawa Timur 60264
ATM KC Malang	Jawa Timur	Jl. Raden Intan No. 74 Kelurahan Arjosari, Kecamatan Blimbing, Kota Malang
ATM KC Medan	Sumatera Utara	Jl. Glugur No.71A/1 (Jl. Gatot Subroto), Kel. Petisah Tengah, Medan
ATM KC Makassar	Sulawesi Selatan	Jl. Karunrung No. 1E, Makassar


BC
bank neo commerce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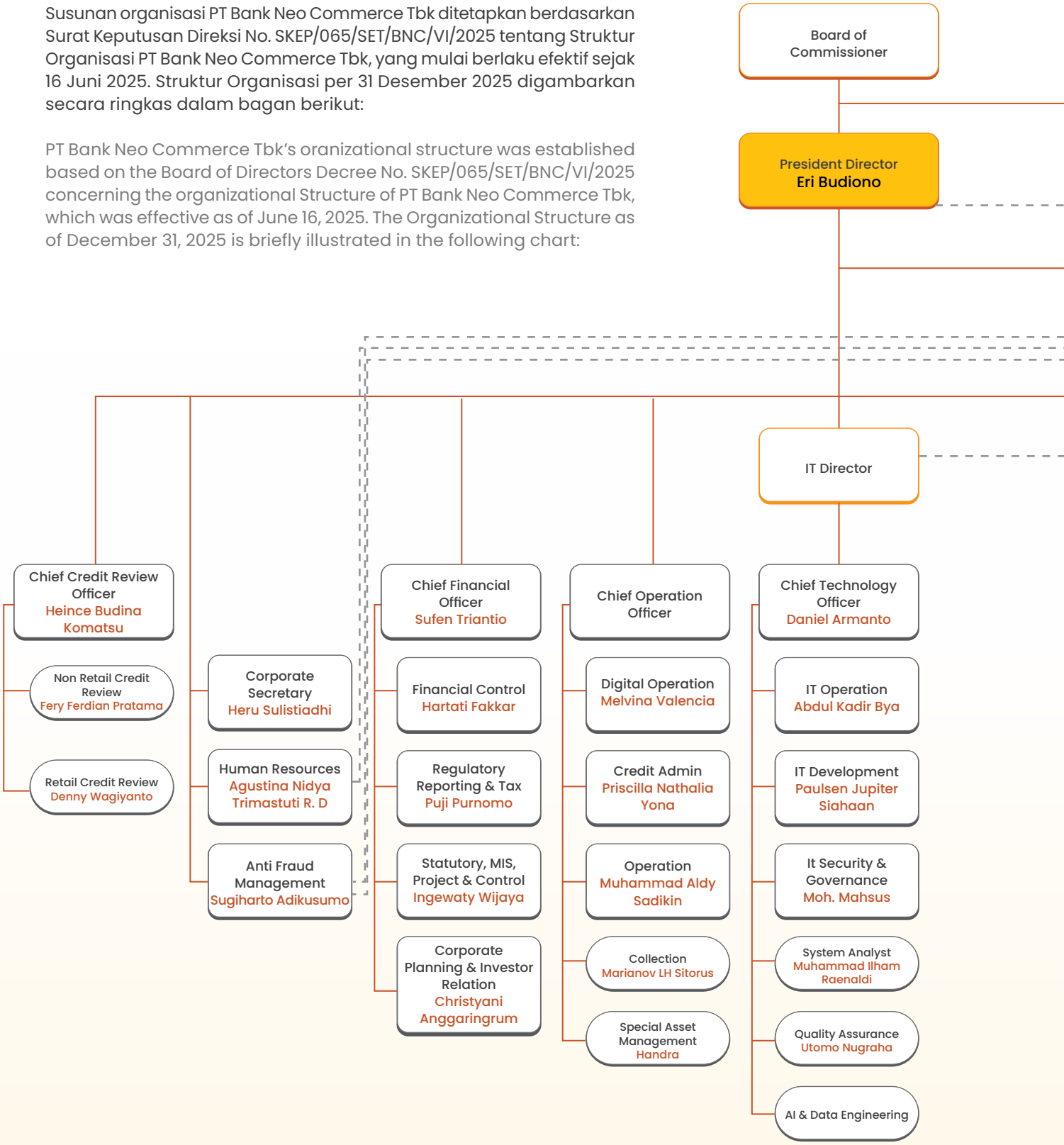
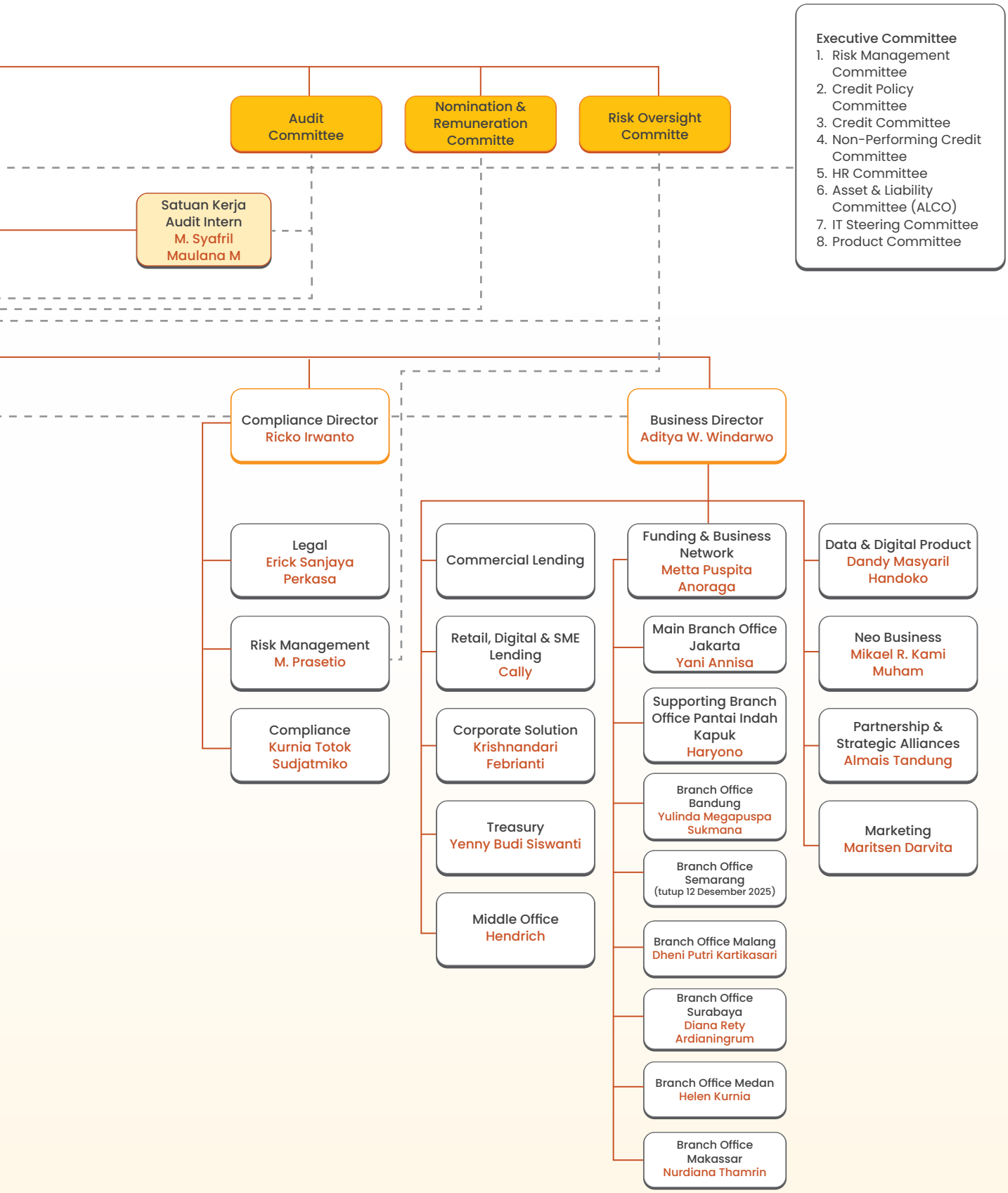
Struktur Organisasi

Organizational Structure

Susunan organisasi PT Bank Neo Commerce Tbk ditetapkan berdasarkan Surat Keputusan Direksi No. SKEP/065/SET/BNC/VI/2025 tentang Struktur Organisasi PT Bank Neo Commerce Tbk, yang mulai berlaku efektif sejak 16 Juni 2025. Struktur Organisasi per 31 Desember 2025 digambarkan secara ringkas dalam bagan berikut:

PT Bank Neo Commerce Tbk's oranizational structure was established based on the Board of Directors Decree No. SKEP/065/SET/BNC/VI/2025 concerning the organizational Structure of PT Bank Neo Commerce Tbk, which was effective as of June 16, 2025. The Organizational Structure as of December 31, 2025 is briefly illustrated in the following chart:




Executive Committee
1. Risk Management Committee
2. Credit Policy Committee
3. Credit Committee
4. Non-Performing Credit Committee
5. HR Committee
6. Asset & Liability Committee (ALCO)
7. IT Steering Committee
8. Product Committee
Audit Committee
Nomination & Remuneration Committe
Risk Oversight Committe
Satuan Kerja Audit Intern
M. Syafril Maulana M
Compliance Director
Ricko Irwanto
Business Director
Aditya W. Windarwo
Legal
Erick Sanjaya Perkasa
Risk Management
M. Prasetio
Compliance
Kurnia Totok Sudjatmiko
Commercial Lending
Retail, Digital & SME Lending
Cally
Corporate Solution
Krishnandari Febrianti
Treasury
Yenny Budi Siswanti
Middle Office
Hendrich
Funding & Business Network
Metta Puspita Anoraga
Main Branch Office Jakarta
Yani Annisa
Supporting Branch Office Pantai Indah Kapuk
Haryono
Branch Office Bandung
Yulinda Megapuspa Sukmana
Branch Office Semarang
(tutup 12 Desember 2025)
Branch Office Malang
Dheni Putri Kartikasari
Branch Office Surabaya
Diana Rety Ardianingrum
Branch Office Medan
Helen Kurnia
Branch Office Makassar
Nurdiana Thamrin
Data & Digital Product
Dandy Masyaril Handoko
Neo Business
Mikael R. Kami Muham
Partnership & Strategic Alliances
Almais Tandung
Marketing
Maritsen Darvita

Dewan Komisaris
Board of Commissioners



Dari Kiri ke Kanan
From Left to Right

Pramoda Dei Sudarmo
Komisaris Independen
Independent Commissioner

Inkawan D. Jusi
Komisaris Utama Independen
Independent President Commissioner

Kreisna Dewantara Gozali
Komisaris
Commissioner

Profil Dewan Komisaris
Board of Commissioners Profile



Inkawan D. Jusi

Komisaris Utama Independen
Independent President Commissioner

Masa Jabatan : 2023 - Sekarang
Term of Office : 2023 - Present

WNI, usia 63 tahun, domisili di Jakarta
Indonesian citizen, 63 years old, live in Jakarta

Dasar Pengangkatan
Basis of Appointment

Keputusan RUPSLB tanggal 18 April 2023 yang tercantum dalam Akta PKR RUPSLB No. 108 tanggal 18 April 2023 dan secara efektif menjabat sejak 13 Februari 2024.
Resolution of the EGMS dated April 18, 2023 as stated in the Deed of PKR EGMS No. 108 dated April 18, 2023 and effectively serving since February 13, 2024.

Sertifikasi Certification	Sertifikasi Kualifikasi 7 Manajemen Risiko Perbankan (2024) Banking Risk Management Qualification Certification 7 (2024)
Gelar Pendidikan Education Degree	• Graduate School of Business, Strategic Marketing Management Program dari Stanford University (2008) • Master of Business Administration dari Western Illinois University (1989) • Sarjana Teknik Arsitektur dari Universitas Indonesia (1986) • Graduate School of Business, Strategic Marketing Management Program from Stanford University (2008) • Master of Business Administration from Western Illinois University (1989) • Bachelor of Architecture from University of Indonesia (1986)
Riwayat Karir Career History	• General Manager Personal Banking & Service Excellence Center di Bank Muscat (2013–2022) • President Commissioner di AXA Mandiri Financial Services (2010–2012) • Vice President / E-Banking Department Head sampai Senior Vice President / Wealth Management Group Head di Bank Mandiri (2004-2012) • Sales Director dan President Director/CEO di Euronet Sigma Nusantara (2003–2004) • Assistant Vice President, Branch Planning Head sampai Vice President, Branch & Phone Banking Development Head di Bank Universal (1995–2002) • Management Associate, Citigold MIS Officer sampai Manager, ATM Unit Head di Citibank N.A. (1989–1995) • General Manager Personal Banking & Service Excellence Center at Bank Muscat Bank (2013–2022) • President Commissioner at AXA Mandiri Financial Services (2010–2012) • Vice President / E-Banking Department Head to Senior Vice President / Wealth Management Group Head at Bank Mandiri (2004-2012) Sales Director and President Director/CEO at Euronet Sigma Nusantara (2003–2004) • Assistant Vice President, Branch Planning Head to Vice President, Branch & Phone Banking Development Head at Bank Universal (1995–2002) • Management Associate, Citigold MIS Officer to Manager, ATM Unit Head at Citibank N.A. (1989–1995)
Rangkap Jabatan Concurrent Position	Di Perusahaan/Institusi Lain: Tidak memiliki rangkap jabatan sebagai anggota Dewan Komisaris, Direksi, dan/atau anggota Komite di perusahaan lain. In Other Companies/Institutions: Does not hold concurrent positions as a member of the Board of Commissioners, Board of Directors, and/or member of the Committee in another company.
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, Direksi, dan Pemegang Saham Utama. Does not have affiliated relationship with other members of the Board of Commissioners, Board of Directors, and Major Shareholders.
Kepemilikan Saham Share Ownership	Tidak memiliki saham di Perseroan. Does not have shares in the Company.



Kreisna Dewantara Gozali

Komisaris
Commissioner

Masa Jabatan : 2024 - Sekarang
Term of Office : 2024 – Present

WNI, usia 45 tahun, domisili di Jakarta
Indonesian citizen, 45 years old, live in Jakarta

Dasar Pengangkatan
Basis of Appointment

Keputusan RUPSLB tanggal 30 April 2024 yang tercantum Akta PKR RUPSLB PT Bank Neo Commerce Tbk No. 133 tanggal 30 April 2024 dan secara efektif menjabat sejak tanggal 4 November 2024.
Decision of the EGMS dated April 30, 2024, as stated in the Deed of PKR EGMS of PT Bank Neo Commerce Tbk No. 133 dated April 30, 2024, and effectively serving since November 4, 2024

Sertifikasi Certification	Sertifikasi Kualifikasi 6 Manajemen Risiko Perbankan (2024) Banking Risk Management Qualification Certification 6 (2024)
Gelar Pendidikan Education Degree	Bachelor of Science di bidang Industrial Engineering dari Worcester Polytechnic Institute, USA pada tahun (2003) Bachelor of Science in Industrial Engineering from Worcester Polytechnic Institute, USA in (2003)
Riwayat Karir Career History	• Direktur Utama di PT Gozco Land Development (2021-2024) • Komisaris di PT Cahaya Vidi Abadi (2019-2024) • Direktur di PT Gozco Capital (2019-2024) • Wakil Komisaris Utama di PT Golden Blossom Sumatera (2017-2019) • Direktur Utama di PT Palmdale Agroasia Lestari Makmur (2009-2017) • Komisaris di PT Telaga Sari Persada (2009-2024) • Direktur Utama dan Wakil Komisaris Utama di PT Pemdas Agro Citra Buana (2004-2024) • Wakil Komisaris Utama di PT Suryabumi Agrolanggeng (2003-2024) • IT Analyst di Deutsche Bank USA (2002) • Junior Tech Analyst di Silver Oak Partners Inc USA (2001-2002) • Konsultan Teknik di Vetreria Archimede Seguso S.R.L, Italy (2001) • Asisten Direksi di PT Fortune Mate Indonesia Tbk (2000-2004) • Asisten Direksi di PT Tong Chuang Indonesia Tbk (1999-2004) • President Director at PT Gozco Land Development (2021-2024) • Commissioner at PT Cahaya Vidi Abadi (2019 - 2024) • Director at PT Gozco Capital (2019-2024) • Deputy Commissioner at PT Golden Blossom Sumatera (2017-2019) • President Director at PT Palmdale Agroasia Lestari Makmur (2009-2017) • Commissioner at PT Telaga Sari Persada (2009-2024) • President Director and Deputy President Commissioner at PT Pemdas Agro Citra Buana (2004-2024) • Deputy Chief Commissioner at PT Suryabumi Agrolanggeng (2003-2024) • IT Analyst at Deutsche Bank USA (2002) • Junior Tech Analyst at Silver Oak Partners Inc USA (2001-2002) • Engineering Consultant at Vetreria Archimede Seguso S.R.L, Italy (2001) • Assistant Director at PT Fortune Mate Indonesia Tbk (2000-2004) • Assistant Director at PT Tong Chuang Indonesia Tbk (1999-2004)
Rangkap Jabatan Concurrent Position	Di Perusahaan/Institusi Lain: President Director di PT Gozco Plantations Tbk (2007-sekarang). In Other Companies/Institutions: President Director at PT Gozco Plantations Tbk (2007- Now)
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, Direksi, dan Pemegang Saham Utama. Does not have affiliated relationship with other members of the Board of Commissioners, Board of Directors, and Major Shareholders.
Kepemilikan Saham Share Ownership	Tidak memiliki saham di Perseroan. Does not have shares in the Company.



Pramoda Dei Sudarmo

Komisaris Independen
Independent Commissioner

Masa Jabatan : 2024 - Sekarang
Term of Office : 2024 – Present

WNI, usia 40 tahun, domisili di Jakarta
Indonesian citizen, 40 years old, live in Jakarta

Dasar Pengangkatan
Basis of Appointment

Periode Pertama | First Period:
Keputusan RUPSLB tanggal 28 Mei 2021 sesuai Akta PKR RUPSLB PT Bank Neo Commerce Tbk No. 38 tanggal 28 Mei 2021 dan secara efektif menjabat sejak 1 September 2022.
The decision of the EGMS dated May 28th, 2021 in accordance with the Deed of PKR EGMS of PT Bank Neo Commerce Tbk No. 38 dated May 28th, 2021 and effectively served since September 1, 2022.

Periode Berjalan | Current Period:
Diangkat kembali berdasarkan keputusan RUPSLB tanggal 30 April 2024 yang tercantum pada Akta PKR No. 133 tanggal 30 April 2024.
Reappointed based on the decision of the EGMS dated April 30th, 2024 as stated in Deed of PKR No. 133 dated April 30th, 2024.

Sertifikasi Certification	Sertifikasi Kualifikasi 7 Manajemen Risiko Perbankan (2025) Banking Risk Management Qualification Certification 7 (2025)
Gelar Pendidikan Education Degree	• Master In Public Administration dari Harvard University, Harvard Kennedy School (2015) • Master of Business & Finance dari Wharton University of Pennsylvania (2015) • Master of Science dari Nanyang Technological University (2008) • Bachelor of Communication Studies dari Nanyang Technological University (2007) • Master In Public Administration from Harvard University, Harvard Kennedy School (2015) • Master of Business & Finance from Wharton University of Pennsylvania (2015) • Master of Science from Nanyang Technological University (2008) • Bachelor of Communication Studies from Nanyang Technological University (2007)
Riwayat Karir Career History	• Staf Khusus Menteri di Kementerian Pendidikan Kebudayaan, Riset dan Teknologi (2019- 2024) • Penasihat Menteri di Kementerian Agraria dan Tata Ruang (2019) • Engagement Manager di McKinsey & Company (2018-2019) • Associate di McKinsey & Company (2016-2018) • Asisten Deputi Kepala Staf di Kantor Staf Presiden (2015) • Summer Associate di General Atlantic, LLC (2013) • Special Staff to the Minister at the Ministry of Education, Culture, Research and Technology (2019-2024) • Ministerial Advisor at the Ministry of Agrarian Affairs and Spatial Planning (2019) • Engagement Manager di McKinsey & Company (2018-2019) • Associate di McKinsey & Company (2016-2018) • Asisten Deputi Kepala Staf di Kantor Staf Presiden (2015) • Summer Associate di General Atlantic, LLC (2013)
Rangkap Jabatan Concurrent Position	Di Perusahaan/Institusi Lain: Chief of Staff di Arsari Group In Other Companies/Institutions: Chief of Staff of Arsari Group
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, Direksi, dan Pemegang Saham Utama. Does not have affiliated relationship with other members of the Board of Commissioners, Board of Directors, and Major Shareholders
Kepemilikan Saham Share Ownership	Tidak memiliki saham di Perseroan. Does not have shares in the Company.

Informasi Perubahan Komposisi Dewan Komisaris Tahun 2025

Sepanjang tahun 2025, tidak ada perubahan dalam susunan Dewan Komisaris. Hingga 31 Desember 2025, Dewan Komisaris Perseroan terdiri atas 3 (tiga) orang, yang meliputi 1 (satu) Komisaris Utama Independen, 1 (satu) Komisaris, dan 1 (satu) Komisaris Independen. Seluruh anggota Dewan Komisaris merupakan profesional dengan latar belakang pendidikan, kompetensi, serta pengalaman yang beragam dan saling melengkapi.

Adapun komposisi Dewan Komisaris Perseroan selama tahun 2025 adalah sebagai berikut:

Information on Changes to the Composition of the Board of Commissioners in 2025

Throughout 2025, there were no changes in the composition of the Board of Commissioners. As of December 31, 2025, the Company's Board of Commissioners consisted of 3 (three) members, comprising 1 (one) Independent President Commissioner, 1 (one) Commissioner, and 1 (one) Independent Commissioner. All members of the Board of Commissioners are professionals with diverse and complementary educational backgrounds, competencies, and experience.

The composition of the Company's Board of Commissioners for the year 2025 is as follows:

Nama Name	Jabatan Position
Inkawan D. Jusi	Komisaris Utama Independen Independent President Commissioner
Pramoda Dei Sudarmo	Komisaris Independen Independent Commissioner
Kreisna Dewantara Gozali	Komisaris Commissioner



Direksi
Board of Directors



Dari Kiri ke Kanan
From Left to Right

Ricko Irwanto
Direktur Kepatuhan
Compliance Director

Eri Budiono
Direktur Utama
President Director

Aditya Wahyu Windarwo
Direktur Bisnis
Business Director

Profil Direksi
Board of Directors Profile



Eri Budiono

Direktur Utama
President Director

Masa Jabatan : 2024 - Sekarang
Term of Office : 2024 - Present

WNI, usia 57 tahun, domisili di Jakarta
Indonesian citizen, 57 years old, live in Jakarta

Dasar Pengangkatan
Basis of Appointment

Keputusan RUPSLB tanggal 30 April 2024 sesuai Akta 133 dan secara efektif menjabat sejak tanggal 09 Agustus 2024.
The decision of the EGMS dated April 30, 2024, in accordance with Deed 133 and effectively serving since August 9th, 2024.

Sertifikasi Certification	Sertifikasi Kualifikasi 7 Manajemen Risiko Perbankan (2024). Banking Risk Management Qualification Certification 7 (2024).
Gelar Pendidikan Education Degree	Sarjana Bisnis Perbankan dan Keuangan dari Monash University, Australia pada tahun (1993). Bachelor of Business Banking and Finance from Monash University, Australia in (1993).
Riwayat Karir Career History	• Direktur Utama PT Bank Neo Commerce Tbk (2024-sekarang) • Komisaris PT Pemeringkat Kredit Indonesia (2023-2024) • Founder & Chief Executive Officer TerraThrive (2023-2024) • Direktur Commercial Banking PT Bank HSBC Indonesia (2020-2023) • Direktur Perbankan Global (Global Banking Director) PT Bank Maybank Indonesia Tbk (2015-2020) • Direktur Corporate and Investment Banking PT Bank Rabobank International Indonesia (2009-2015) • Direktur Origination Teak Capital Partners, Singapore (2007-2009) • Head of Corporate and Institutional Banking, Head of Financial Institutional Group dan Vice President Corporate and Institutional Banking HSBC (2000-2007) • Assistant Vice President Special Credits Group ABN AMRO Bank N.V. Indonesia (1998-2000) • Asia Pacific Credit Analyst ABN AMRO Bank N.V. – Singapore (Regional Office) (1997-1997) • Account Relationship Manager ABN AMRO Bank N.V. Indonesia (1993-1998) • President Director of PT Bank Neo Commerce Tbk (2024-present) • Commissioner of PT Pemeringkat Kredit Indonesia (2023-2024) • Founder & Chief Executive Officer TerraThrive (2023-2024) • Director of Commercial Banking PT Bank HSBC Indonesia (2020-2023) • Global Banking Director PT Bank Maybank Indonesia Tbk (2015-2020) • Director of Corporate and Investment Banking PT Bank Rabobank International Indonesia (2009-2015) • Director Origination Teak Capital Partners, Singapore (2007-2009) • Head of Corporate and Institutional Banking, Head of Financial Institutional Group and Vice President Corporate and Institutional Banking HSBC (2000-2007) • Assistant Vice President Special Credits Group ABN AMRO Bank N.V. Indonesia (1998-2000) • Asia Pacific Credit Analyst ABN AMRO Bank N.V. – Singapore (Regional Office) (1997-1997) • Account Relationship Manager ABN AMRO Bank N.V. Indonesia (1993-1998)
Rangkap Jabatan Concurrent Position	Di Perusahaan/Institusi Lain: Tidak merangkap jabatan di perusahaan atau institusi lain. In Other Companies/Institutions: Not holding concurrent positions in other companies or institutions.
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Utama. Does not have affiliated relationship with members of the Board of Commissioners, Board of Directors, and Major Shareholders.
Kepemilikan Saham Share Ownership	Tidak memiliki saham di Perseroan. Does not have shares in the Company.



Aditya Wahyu Windarwo

Direktur Bisnis
Business Director

Masa Jabatan : 2021 - Sekarang
Term of Office : 2021 - Present

WNI, usia 48 tahun, domisili di Jakarta
Indonesian citizen, 48 years old, live in Jakarta

Dasar Pengangkatan
Basis of Appointment

Rapat Umum Pemegang Saham Luar Biasa tanggal 31 Maret 2021 sesuai Akta 22 dan secara efektif menjabat sejak tanggal 30 Juni 2021.
Extraordinary General Meeting of Shareholders on March 31st, 2021 in accordance with Deed 22 and effectively serving since June 30th, 2021.

Sertifikasi Certification	• Sertifikasi Kualifikasi 7 Manajemen Risiko Perbankan (2024) • Sertifikasi Tresuri Jenjang 7 (2025) • Banking Risk Management Qualification Certification 7 (2024) • Treasury Level 7 Certification (2025)
Gelar Pendidikan Education Degree	• Master of Science dari University of Colorado Denver, USA (2002) • Sarjana Ekonomi dari Universitas Indonesia (2000) • Master of Science from University of Colorado Denver, USA (2002) • Bachelor of Economics from University of Indonesia (2000)
Riwayat Karir Career History	• Direktur Bisnis di PT Bank Neo Commerce Tbk (2021-sekarang) • Kadiv Wealth Management, Retail Liability & Customer Segment Head di PT Bank Permata Tbk (2019–2021) • Kadiv/Retail Product Management & Digital Banking Head di PT Bank Mega Tbk (2014–2019) • Investment and FX Head di PT Bank Danamon Tbk (2010–2014) • Head of Deposit and Investment di PT Bank Barclays Indonesia (2009–2010) • Investment Product Head di HSBC (2007–2009) • Business Director at PT Bank Neo Commerce Tbk (2021-present) • Head of Wealth Management, Retail Liability & Customer Segment Head at PT Bank Permata Tbk (2019–2021) • Head of Division/Retail Product Management & Digital Banking Head at PT Bank Mega Tbk (2014–2019) • Investment and FX Head at PT Bank Danamon Tbk (2010–2014) • Head of Deposit and Investment at PT Bank Barclays Indonesia (2009–2010) • Investment Product Head at HSBC (2007–2009)
Rangkap Jabatan Concurrent Position	Di Perusahaan/Institusi Lain: Tidak merangkap jabatan di perusahaan atau institusi lain. In Other Companies/Institutions: Not holding concurrent positions in other companies or institutions.
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Utama. Does not have affiliated relationship with members of the Board of Commissioners, Board of Directors, and Major Shareholders.
Kepemilikan Saham Share Ownership	Tidak memiliki saham di Perseroan. Does not have shares in the Company.



Ricko Irwanto

Direktur Kepatuhan
Compliance Director

Masa Jabatan : 2021 - Sekarang
Term of Office : 2021 - Present

WNI, usia 55 tahun, domisili di Tangerang Selatan
Indonesian citizen, 55 years old, live in South Tangerang

Dasar Pengangkatan
Basis of Appointment

Keputusan RUPSLB tanggal 29 Desember 2021 sesuai Akta PKR RUPSLB No. 271 tanggal 29 Desember 2021 dan secara efektif menjabat sejak 28 Januari 2022.
The decision of the EGMS dated December 29th, 2021 in accordance with the Deed of EGMS No. 271 dated December 29th, 2021 and effectively served since January 28th, 2022.

Sertifikasi Certification	• Sertifikasi Kualifikasi 7 Manajemen Risiko Perbankan (2024) • Sertifikasi Jenjang Kualifikasi 7 Bidang Kepatuhan Subbidang Pengelolaan Bank Umum • Sertifikasi Jenjang Kualifikasi 7 Bidang Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme (APU PPT) • Banking Risk Management Qualification Certification 7 (2024) • Certification Qualification Level 7 in Compliance Sub-Field of Commercial Banking Management • Certification Qualification Level 7 in Anti-Money Laundering and Prevention of Terrorism Financing (AML-PTF)
Gelar Pendidikan Education Degree	• Magister Manajemen STIE IPWI (1999) • Sarjana Teknik dari Universitas Sriwijaya (1994) • Master of Management STIE IPWI (1999) • Bachelor of Engineering from Sriwijaya University (1994)
Riwayat Karir Career History	• Direktur Kepatuhan di PT Bank Neo Commerce Tbk (2021-sekarang) • Direktur Kepatuhan PT Bank MNC Internasional Tbk (2019-2021) • Chief Compliance Officer di PT Bank MNC Internasional Tbk (2019) • AML- CFT Division Head di PT Bank OCBC NISP Tbk (2015-2019) • Operational Risk Management Head di PT Bank Permata Tbk (2012-2014) • Area Manager di PT Bank Bali Tbk (2001-2002) • Head of Operation Development and Improvement PT Bank Bali Tbk (1998-2001) • Compliance Director at PT Bank Neo Commerce Tbk (2021-present) • Compliance Director of PT Bank MNC Internasional Tbk (2019-2021) • Chief Compliance Officer at PT Bank MNC Internasional Tbk (2019) • AML- CFT Division Head at PT Bank OCBC NISP Tbk (2015-2019) • Operational Risk Management Head at PT Bank Permata Tbk (2012-2014) • Area Manager at PT Bank Bali Tbk (2001-2002) • Head of Operation Development and Improvement PT Bank Bali Tbk (1998-2001)
Rangkap Jabatan Concurrent Position	Di Perusahaan/Institusi Lain: Tidak merangkap jabatan di perusahaan atau institusi lain. In Other Companies/Institutions: Not holding concurrent positions in other companies or institutions.
Hubungan Afiliasi Affiliation	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, Direksi, dan Pemegang Saham Utama. Does not have affiliated relationship with members of the Board of Commissioners, Board of Directors, and Major Shareholders.
Kepemilikan Saham Share Ownership	Tidak memiliki saham di Perseroan. Does not have shares in the Company.

Informasi Perubahan Komposisi Direksi Tahun 2025

Pada tahun 2025 tidak terdapat perubahan komposisi Direksi Perseroan. Anggota Direksi Perseroan per 31 Desember 2025 tercatat sebanyak 3 (tiga) orang dengan rincian komposisi sebagai berikut:

Information on Changes in the Composition of the Board of Directors in 2025

In 2025, there were no changes in the composition of the Company's Board of Directors. As of December 31, 2025, the Company's Board of Directors consisted of 3 (three) members, with the following composition:

Nama Name	Jabatan Position
Eri Budiono	Direktur Utama President Director
Aditya Wahyu Windarwo	Direktur Bisnis Business Director
Ricko Irwanto	Direktur Kepatuhan Compliance Director



Surat Pernyataan Anggota Dewan Komisaris dan Anggota Direksi tentang Tanggung Jawab atas Laporan Tahunan dan Laporan Keberlanjutan 2025 PT Bank Neo Commerce Tbk

Responsibility Statement of Board of Commissioners and Board of Directors for 2025 Annual Report and Sustainability Report of PT Bank Neo Commerce Tbk

Kami yang bertanda tangan di bawah ini menyatakan bahwa semua informasi dalam Laporan Tahunan dan Laporan Keberlanjutan PT Bank Neo Commerce Tbk tahun 2025 telah dimuat secara lengkap dan bertanggung jawab penuh atas kebenaran isi Laporan Tahunan dan Laporan Keberlanjutan Perusahaan. Demikian pernyataan ini dibuat dengan sebenarnya.

We, the undersigned, hereby declare that all information in 2025 Annual Report and Sustainability Report of PT Bank Neo Commerce Tbk has been fully disclosed and we are solely responsible upon the accuracy of all contents of the Annual Report and Sustainability Report. This statement has been made truthfully.

Jakarta, 8 April 2026

Dewan Komisaris
Board of Commissioners

Inkawan D. Jusi
Komisaris Utama Independen
Independent President Commissioner

Kreisna Dewantara Gozali
Komisaris
Commissioner

Pramoda Dei Sudarmo
Komisaris Independen
Independent Commissioner

Direksi
Board of Directors

Eri Budiono
Direktur Utama
President Director

Aditya Wahyu Windarwo
Direktur Bisnis
Business Director

Ricko Irwanto
Direktur Kepatuhan
Compliance Director

Pejabat Eksekutif
Executive Officers

Informasi mengenai pejabat eksekutif Perseroan disajikan secara ringkas dalam tabel berikut:

Information on the Company's executive officers is presented briefly in the following table:

No	Nama Name	Jabatan Position
1	Daniel Armanto	Chief Technology Officer
2	Heince Budina Komatsu	Chief Credit Review Officer
3	Sufen Triantio	Chief Financial Officer
4	Agustina Chaidir	Head of Commercial Lending
5	Agustina Nidya Trimastuti R. D	Head of Human Resources
6	Almais Tandung	Head of Partnership & Strategic Alliances
7	Cally	Head of Retail, Digital & SME Lending
8	Dandy Masyaril Handoko	Head of Data & Digital Product
9	Erick Sanjaya Perkasa	Head of Legal
10	Hendrich	Head of Middle Office
11	Heru Sulistiadhi	Head of Corporate Secretary
12	Krishnandari Febrianti	Head of Corporate Solution
13	Kurnia Totok Sudjatmiko	Head of Compliance
14	M. Prasetio	Head of Risk Management
15	M. Syafril Maulana M	Head of Satuan Kerja Audit Intern
16	Maritsen Darvita	Head of Marketing
17	Metta Puspita Anoraga	Head of Funding & Business Network
18	Mikael R. Kami Muham	Head of Neo Business
19	Sugiharto Adikusumo	Head of Anti Fraud Management
20	Yenny Budi Siswanti	Head of Treasury
21	Dheni Putri Kartikasari	Branch Manager
22	Diana Rety Ardianingrum	Branch Manager
23	Helen Kurnia	Branch Manager
24	Nurdiana Thamrin	Branch Manager
25	Yani Annisa	Branch Manager
26	Yulinda Megapuspa Sukmana	Branch Manager

Demografi Karyawan

Data mengenai komposisi karyawan berdasarkan jenis kelamin, jenjang jabatan, kelompok usia, tingkat pendidikan, serta status ketenagakerjaan diuraikan secara lebih rinci dalam Bab Tinjauan Pendukung Bisnis pada Laporan Tahunan 2025.

Employee Demographics

Employee composition data based on gender, position level, age group, educational level, and employment status is presented in detail in the Business Support Overview Chapter of the Annual Report 2025.

Informasi Pemegang Saham
Shareholders Information

Komposisi Pemegang Saham
Shareholders Composition

Nama Pemegang Saham Shareholders	1 Januari 2025 January 1, 2025		31 Desember 2025 December 31, 2025	
	Lembar Saham Number of Shares	Persentase (%) Percentage (%)	Lembar Saham Number of Share	Persentase (%) Percentage (%)
Kepemilikan Saham di atas 5% Share Ownership above 5%				
PT Akulaku Silvrr Indonesia	4.598.768.727	34,45	4.598.768.727	34,45
PT Gozco Capital	962.931.705	7,21	1.035.384.381	7,76
Rockcore Financial	736.968.376	5,52	736.968.376	5,52
Kepemilikan Saham di bawah 5% Share Ownership below 5%				
Masyarakat Public	7.051.813.538	52,82	6.979.360.862	52,27
Jumlah Total	13.350.482.346	100,00	13.350.482.346	100,00

Komposisi Kepemilikan Saham berdasarkan Status Kepemilikan
Shareholders Composition based on Ownership Status

Jenis Pemegang Saham Type of Shareholders	Jumlah Saham Number of Shares	Persentase (%) Percentage (%)
Individu Domestik Domestic Individual	2.868.708.549	21,49%
Individu Asing Foreign Individual	304.883.199	2,28%
Institusi Domestik Domestic Institution	6.997.782.797	52,42%
Institusi Asing Foreign Institution	3.179.107.801	23,81%
Jumlah Total	13.350.482.346	100,00%

Kepemilikan Saham Anggota Dewan Komisaris dan Direksi Secara Langsung Maupun Tidak Langsung

Selama periode 1 Januari 2025 hingga 31 Desember 2025, tidak terdapat anggota Dewan Komisaris maupun Direksi Perseroan yang memiliki saham BNC, baik secara langsung maupun tidak langsung. Sejalan dengan ketentuan Otoritas Jasa Keuangan, Perseroan telah menetapkan kebijakan terkait kepemilikan saham Direksi yang mewajibkan setiap anggota Direksi untuk mengungkapkan kepemilikan saham paling lambat 3 (tiga) hari kerja sejak terjadinya kepemilikan tersebut.

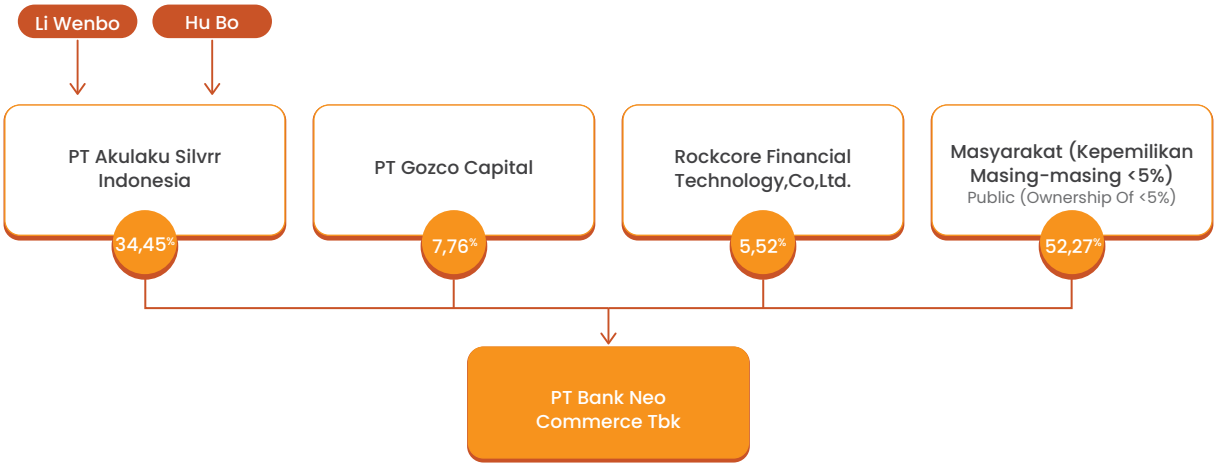
Direct and Indirect Share Ownership by Members of the Board of Commissioners and Board of Directors

During the period of January 1, 2025, through December 31, 2025, no member of the Company's Board of Commissioners or Board of Directors owns BNC's shares, either directly or indirectly. In accordance with Financial Services Authority regulations, the Company has established a policy regarding Board of Directors' share ownership that requires each member of the Board of Directors to disclose their share ownership no later than 3 (three) business days after the acquisition of shares.

Struktur Grup
Group Structure

Hingga akhir tahun 2025, BNC tidak memiliki entitas anak, entitas asosiasi, maupun ventura bersama. Dengan demikian, struktur grup Perseroan per 31 Desember 2025 digambarkan secara sederhana dalam bagan berikut:

As of the end of 2025, BNC has no subsidiaries, associates, or joint ventures. Accordingly, the Company's group structure as of December 31, 2025, is illustrated briefly in the following chart:



Informasi Pemegang Pengendali

Per 31 Desember 2025, PT Akulaku Silvrr Indonesia (ASI) tercatat sebagai pemegang saham pengendali BNC dengan kepemilikan 4.598.768.727 saham BNC atau setara dengan 34,45% dari total saham yang beredar.

PT Akulaku Silvrr Indonesia merupakan bagian dari Akulaku Group, sebuah grup usaha yang bergerak di bidang *e-commerce* dan layanan keuangan digital. Akulaku dikenal sebagai perusahaan *fintech* terkemuka di Asia Tenggara yang menyediakan berbagai solusi keuangan digital, seperti layanan belanja cicilan tanpa kartu kredit, pinjaman tunai, pembayaran tagihan, serta *top-up* pulsa. Akulaku beroperasi di Indonesia, Filipina, Vietnam, dan Malaysia, dengan komitmen untuk meningkatkan kualitas hidup pengguna melalui pengembangan ekosistem keuangan yang komprehensif dan andal.

Information on Controlling Shareholders

As of December 31, 2025, PT Akulaku Silvrr Indonesia (ASI) is registered as the controlling shareholder of BNC, with ownership of 4,598,768,727 BNC shares or equivalent to 34.45% of the total outstanding shares.

PT Akulaku Silvrr Indonesia is part of the Akulaku Group, a business group operating in the e-commerce and digital financial services sectors. Akulaku is known as a leading fintech company in Southeast Asia that provides various digital financial solutions, such as installment shopping without a credit card, cash loans, bill payments, and mobile top-ups. Akulaku operates in Indonesia, the Philippines, Vietnam, and Malaysia, with a commitment to improving users' quality of life through the development of a comprehensive and reliable financial ecosystem.

Kronologi Pencatatan Saham

Share Listing Chronology

Tanggal Pencatatan Date	Keterangan Description	Nilai Nominal Nominal Value	Jumlah Saham yang Diterbitkan Number of shares issued	Pencatatan Listed
13 Januari 2015 January 13th, 2015	Penawaran Saham Perdana Initial Public Offering	100	300.000.000	Bursa Efek Indonesia Indonesia Stock Exchange
18 Mei 2016 May 18th, 2016	Penawaran Umum Terbatas I (PUT I) dalam rangka HMETD Limited Public Offering I (PUT I) in the context of HMETD	100	1.509.096.000	Bursa Efek Indonesia Indonesia Stock Exchange
TW IV 2016 Quarter IV 2016	Exercise Waran Exercise Waran	100	175.702.690	Bursa Efek Indonesia Indonesia Stock Exchange
TW I 2017 Quarter I 2017	Exercise Waran Exercise Waran	100	7.014.000	Bursa Efek Indonesia Indonesia Stock Exchange
TW II 2017 Quarter II 2017	Exercise Waran dan Saham Bonus Exercise Waran and Bonus Shares	100	428.317.017	Bursa Efek Indonesia Indonesia Stock Exchange
TW III 2017 Quarter III 2017	Exercise Waran Exercise Waran	100	60.729.921	Bursa Efek Indonesia Indonesia Stock Exchange
TW IV 2017 Quarter IV 2017	Exercise Waran Exercise Waran	100	875.860	Bursa Efek Indonesia Indonesia Stock Exchange
TW I 2018 Quarter I 2018	Exercise Waran Exercise Waran	100	9.645.800	Bursa Efek Indonesia Indonesia Stock Exchange
TW II 2018 Quarter II 2018	Exercise Waran Exercise Waran	100	486.144.996	Bursa Efek Indonesia Indonesia Stock Exchange
25 Maret 2019 March 25th, 2019	Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu ("PMTHMETD") Capital Increase Without Pre-emptive Rights ("PMTHMETD")	100	469.591.963	Bursa Efek Indonesia Indonesia Stock Exchange
19 Juni 2019 June 19th, 2019	Penawaran Umum Terbatas II (PUT II) dalam rangka HMETD Limited Public Offering II (PUT II) in the context of HMETD	100	499.603.954	Bursa Efek Indonesia Indonesia Stock Exchange
2 Juli 2020 July 2nd, 2020	Penawaran Umum Terbatas III (PUT III) dalam rangka HMETD Limited Public Offering III (PUT III) in the context of HMETD	100	500.013.138	Bursa Efek Indonesia Indonesia Stock Exchange
15 Juni 2021 June 15th, 2021	Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) IV Capital Increase with Pre-emptive Rights (PMHMETD) IV	100	832.724.404	Bursa Efek Indonesia Indonesia Stock Exchange
2 Desember 2021 December 2nd, 2021	Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) V Capital Increase with Pre-emptive Rights (PMHMETD) V	100	1.927.162.193	Bursa Efek Indonesia Indonesia Stock Exchange

Tanggal Pencatatan Date	Keterangan Description	Nilai Nominal Nominal Value	Jumlah Saham yang Diterbitkan Number of shares issued	Pencatatan Listed
24 November 2022 November 24th, 2022	Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) VI Capital Increase with Pre-emptive Rights (PMHMETD) VI	100	2.617.133.843	Bursa Efek Indonesia Indonesia Stock Exchange
12 Juli 2024 July 12th, 2024	Penambahan Modal Dengan Memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD) VII Capital Increase by Granting Preemptive Rights (PMHMETD) VII	100	1.311.666.667	Bursa Efek Indonesia Indonesia Stock Exchange

Pencatatan Saham Perdana

Pada 31 Desember 2014, Perseroan memperoleh pernyataan efektif dari Otoritas Jasa Keuangan (OJK) melalui surat No. S-584/D.04/2014 terkait pelaksanaan Penawaran Umum Perdana (*Initial Public Offering*/IPO). Selanjutnya, pada 13 Januari 2015, saham Perseroan resmi dicatatkan di Bursa Efek Indonesia, menjadikan Perseroan sebagai perusahaan pertama yang melantai di bursa pada tahun tersebut.

Dalam aksi korporasi ini, Perseroan menerbitkan 300.000.000 (tiga ratus juta) saham biasa atas nama yang berasal dari portepel, setara dengan 11,93% dari modal ditempatkan dan disetor penuh setelah IPO. Saham tersebut memiliki nilai nominal Rp100 per saham dan ditawarkan kepada publik dengan harga Rp115 per saham.

Penawaran Umum Terbatas I

Berdasarkan Akta Pernyataan Keputusan Rapat No. 18 tanggal 10 Maret 2016 yang dibuat di hadapan Notaris Agung Iriantoro, S.H., M.H., Perseroan menyetujui penerbitan hingga 2.500.000.000 saham baru serta penerbitan waran sebanyak-banyaknya 880.000.000 lembar melalui mekanisme Hak Memesan Efek Terlebih Dahulu (HMETD). Pernyataan pendaftaran untuk Penawaran Umum Terbatas (PUT) I diajukan kepada OJK pada 23 Maret 2016 melalui surat No. 017/SET/DIR/BYBTBK/III/2016.

OJK Pasar Modal menyatakan pernyataan pendaftaran tersebut efektif pada 2 Mei 2016 melalui surat No. S-215/D.04/2016. Selanjutnya, Bursa Efek Indonesia menyetujui pencatatan 1.509.096.000 lembar saham baru dengan harga penawaran Rp125 per saham melalui surat No. S-03016/BELPP1/05-2016 tanggal 11 Mei 2016. Dalam PUT I ini, Perseroan juga menerbitkan 754.548.000 Waran Seri I, dengan ketentuan setiap 6 saham

Initial Public Offering

On December 31, 2014, the Company obtained an effective statement from the Financial Services Authority (OJK) through letter No. S-584/D.04/2014 regarding the Initial Public Offering (IPO) process. Subsequently, on January 13, 2015, the Company's shares were officially listed on the Indonesia Stock Exchange, becoming the first company to list its shares on the stock exchange during the year.

In this corporate action, the Company issued 300,000,000 (three hundred million) registered common shares from its portfolio, equivalent to 11.93% of the issued and fully paid-in capital following the IPO. The shares have a par value of Rp100 per share and were offered to the public at a price of Rp115 per share.

Limited Public Offering I

Pursuant to the Deed of Minutes of Meeting No. 18 dated March 10, 2016, made before Notary Agung Iriantoro, S.H., M.H., the Company approved the issuance of up to 2,500,000,000 new shares and the issuance of a maximum of 880,000,000 warrants through the Pre-emptive Rights (HMETD) mechanism. The registration statement for the Limited Public Offering I (PUT I) was submitted to the OJK on March 23, 2016, via letter No. 017/SET/DIR/BYBTBK/III/2016.

The OJK Capital Market Division declared the registration statement effective on May 2, 2016, via letter No. S-215/D.04/2016. Subsequently, the Indonesia Stock Exchange approved the listing of 1,509,096,000 new shares at an offering price of Rp125 per share via letter No. S-03016/BELPP1/05-2016 dated May 11, 2016. In this Initial Public Offering (IPO), the Company also issued 754,548,000 Series I Warrants, with the provision

baru disertai 3 Waran Seri I. Waran tersebut memberikan hak kepada pemegangnya untuk membeli saham baru dengan harga pelaksanaan Rp135 per saham selama periode 18 November 2016 hingga 18 Mei 2018, dengan rasio 1 waran untuk 1 saham baru.

Penawaran Umum Terbatas II

Melalui RUPSLB pada 27 Juni 2018, pemegang saham menyetujui rencana penerbitan hingga 3.000.000.000 saham baru melalui HMETD. Pelaksanaan Penawaran Umum Terbatas II (PUT II) dinyatakan efektif oleh OJK pada 28 Mei 2019 melalui surat No. S-64/D.04/2019.

Dalam PUT II, Perseroan menerbitkan 499.603.954 lembar saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp338 per saham. Saham tersebut setara dengan 8,11% dari modal ditempatkan dan disetor penuh setelah PUT II, berasal dari portepel Perseroan, dan seluruhnya telah dicatatkan di Bursa Efek Indonesia.

Penawaran Umum Terbatas III

Pada 28 Juni 2019, RUPSLB Perseroan memberikan persetujuan atas rencana penerbitan hingga 3.000.000.000 saham baru. OJK kemudian menerbitkan pernyataan efektif untuk pelaksanaan Penawaran Umum Terbatas III (PUT III) melalui surat No. S-66/D.04/2020 tanggal 18 Juni 2020.

Melalui PUT III, Perseroan menawarkan 1.320.381.878 lembar saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp300 per saham. Rasio penerbitan ditetapkan bahwa setiap pemegang 14 saham berhak memperoleh 3 HMETD, di mana setiap 1 HMETD memberikan hak untuk membeli 1 saham baru. Dari jumlah tersebut, sebanyak 500.013.138 lembar saham baru yang berasal dari portepel Perseroan telah resmi dicatatkan di Bursa Efek Indonesia.

Penawaran Umum Terbatas IV

RUPSLB pada 30 September 2020 menyetujui rencana penerbitan hingga 5.000.000.000 saham baru melalui mekanisme HMETD. Pernyataan efektif untuk Penawaran Umum Terbatas IV (PUT IV) diterbitkan oleh OJK pada 31 Mei 2021 melalui surat No. S-76/D.04/2021.

Dalam PUT IV, Perseroan menerbitkan 832.724.404 lembar saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp300 per saham. Rasio HMETD ditetapkan sebesar 1 HMETD untuk setiap 8 saham yang dimiliki, dengan

that every 6 new shares are accompanied by 3 Series I Warrants. These warrants grant their holders the right to purchase new shares at an exercise price of Rp135 per share during the period from November 18, 2016, to May 18, 2018, at a ratio of 1 warrant for 1 new share.

Limited Public Offering II

Through the EGMS on June 27, 2018, shareholders approved a plan to issue up to 3,000,000,000 new shares through Pre-Emptive Rights. The Limited Public Offering II (PUT II) was declared effective by the OJK on May 28, 2019, via Letter No. S-64/D.04/2019.

In the PUT II, the Company issued 499,603,954 new shares with a par value of Rp100 per share and an exercise price of Rp338 per share. These shares represent 8.11% of the fully paid-up capital after PUT II. originating from the Company's portfolio, and have all been listed on the Indonesia Stock Exchange.

Limited Public Offering III

On June 28, 2019, the Company's EGMS approved a plan to issue up to 3,000,000,000 new shares. The OJK subsequently issued an effective statement for the implementation of Limited Public Offering III (PUT III) via Letter No. S-66/D.04/2020 dated June 18, 2020.

Through PUT III, the Company offered 1,320,381,878 new shares with a par value of Rp100 per share and an exercise price of Rp300 per share. The issuance ratio was set such that every holder of 14 shares is entitled to receive 3 Pre-Emptive Rights, where each 1 Pre-Emptive Right grants the right to purchase 1 new share. Of this amount, 500,013,138 new shares from the Company's portfolio have been officially listed on the Indonesia Stock Exchange.

Limited Public Offering IV

The EGMS on September 30, 2020, approved a plan to issue up to 5,000,000,000 new shares through the HMETD mechanism. The effective statement for Limited Public Offering IV (PUT IV) was issued by the OJK on May 31, 2021, via Letter No. S-76/D.04/2021.

In the PUT IV, the Company issued 832,724,404 new shares with a par value of Rp100 per share and an exercise price of Rp300 per share. The Pre-Emptive Rights ratio was set at 1 Pre-Emptive Right for every 8 shares held, with the provision that 1

ketentuan 1 HMETD memberikan hak untuk membeli 1 saham baru. Seluruh saham yang diterbitkan berasal dari portepel Perseroan dan telah dicatatkan di Bursa Efek Indonesia.

Penawaran Umum Terbatas V

Pada 28 Mei 2021, RUPSLB menyetujui rencana penerbitan hingga 5.000.000.000 saham baru. Pelaksanaan PUT V dinyatakan efektif oleh OJK melalui surat No. S-208/D.04/2021 tanggal 18 November 2021. Dalam PUT V ini, Perseroan menerbitkan 1.927.162.193 lembar saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp1.300 per saham.

Rasio penerbitan saham ditetapkan bahwa setiap pemegang 35 saham memperoleh 9 HMETD, di mana setiap 1 HMETD memberikan hak untuk membeli 1 saham baru. Seluruh saham hasil PUT V berasal dari portepel Perseroan dan telah resmi tercatat di Bursa Efek Indonesia.

Penawaran Umum Terbatas VI

Melalui RUPSLB pada 21 Juli 2022, pemegang saham menyetujui penerbitan hingga 5.000.000.000 saham baru. OJK memberikan pernyataan efektif melalui surat No. S-235/D.04/2022 tanggal 10 November 2022, yang mengesahkan penerbitan maksimal 2.617.133.843 saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp650 per saham.

Dalam PUT VI, rasio HMETD ditetapkan sebesar 5 HMETD untuk setiap 18 saham yang dimiliki, dengan ketentuan 1 HMETD memberikan hak untuk membeli 1 saham baru. Seluruh saham hasil pelaksanaan HMETD sebanyak 2.617.133.843 saham diterbitkan dari portepel Perseroan dan telah dicatatkan di Bursa Efek Indonesia.

Penawaran Umum Terbatas VII

RUPSLB Perseroan pada 8 Agustus 2023 menyetujui rencana penambahan modal melalui penerbitan hingga 5.000.000.000 saham baru dengan nilai nominal Rp100 per saham. Dalam rangka Penawaran Umum Terbatas VII, Perseroan melaksanakan Penambahan Modal dengan Memberikan Hak Memesan Efek Terlebih Dahulu (PMHMETD) dengan menerbitkan 1.311.666.667 saham baru dengan harga pelaksanaan Rp300 per saham.

Pre-Emptive Right grants the right to purchase 1 new share. All shares issued were sourced from the Company's portfolio and have been listed on the Indonesia Stock Exchange.

Limited Public Offering V

On May 28, 2021, the EGMS approved a plan to issue up to 5,000,000,000 new shares. The PUT V was declared effective by the OJK via Letter No. S-208/D.04/2021 dated November 18, 2021. In this PUT V, the Company issued 1,927,162,193 new shares with a par value of Rp100 per share and an exercise price of Rp1,300 per share.

The share issuance ratio was set such that every holder of 35 shares received 9 Pre-Emptive Rights, where each 1 Pre-Emptive Right grants the right to purchase 1 new share. All shares issued through PUT V originated from the Company's portfolio and have been officially listed on the Indonesia Stock Exchange.

Limited Public Offering VI

Through the EGMS on July 21, 2022, shareholders approved the issuance of up to 5,000,000,000 new shares. The OJK issued an effective statement via Letter No. S-235/D.04/2022 dated November 10, 2022, authorizing the issuance of up to 2,617,133,843 new shares with a par value of Rp100 per share and an exercise price of Rp650 per share.

In PUT VI, the Pre-Emptive Rights ratio was set at 5 Pre-Emptive Rights for every 18 shares held, with the provision that 1 Pre-Emptive Right grants the right to purchase 1 new share. All shares from the Pre-Emptive Rights, totaling 2,617,133,843 shares, were issued from the Company's portfolio and have been listed on the Indonesia Stock Exchange.

Limited Public Offering VII

The Company's EGMS on August 8, 2023, approved a capital increase plan through the issuance of up to 5,000,000,000 new shares with a par value of Rp100 per share. In connection with the Limited Public Offering VII, the Company carried out a Capital Increase through the Exercise of Preemptive Rights (PMHMETD) by issuing 1,311,666,667 new shares at an exercise price of Rp300 per share.

Kronologi Pencatatan Efek Lainnya

Sepanjang tahun 2025, Perseroan tidak melakukan pencatatan efek lainnya. Oleh karena itu, informasi terkait kronologi pencatatan efek selain saham menjadi tidak relevan untuk disajikan dalam Laporan Tahunan 2025.

Chronology of Other Securities Listings

Throughout 2025, the Company did not list any other securities. Therefore, information regarding the chronology of listings of securities other than shares is not relevant to be presented in the 2025 Annual Report.

Informasi Jasa Akuntan Publik

Informasi mengenai Kantor Akuntan Publik yang memberikan jasa audit dan layanan terkait kepada Perseroan selama periode pelaporan disajikan secara ringkas dalam tabel berikut:

Information of Public Accountant Services

Information regarding the Public Accounting Firm that provided audit and related services to the Company during the reporting period is summarized in the following table:

Kantor Akuntan Publik Public Accounting Firm	KAP Purwanto Susanti dan Surja
Jaringan Asosiasi Association Network	Ernst & Young Global Limited
Nomor Surat Tanda Terdaftar KAP KAP Registered Letter Number	STTD.KAP-17/PM.021/2025
Nama Akuntan Publik Name of Public Accountant	Yovita
Nomor Registrasi AP AP Registration Number	AP.0242
Nomor Surat Tanda Terdaftar AP AP Registered Certificate Number	Perbankan/Banking : STTD.AP-58/PB.122/2019 Pasar Modal/Capital Market : STTD.AP-020/PM.223/2019
Alamat Address	Indonesia Stock Exchange Building Tower 2, 7th Floor Jl. Jend. Sudirman Kav. 52-53 Jakarta 12190 Telp: (021) 5289 5000, Web: http://www.ey.com
Periode Penugasan Assignment Period	Tahun buku 2025 Financial Year 2025
Jasa yang Diberikan Services Provided	Jasa Audit: Audit atas Laporan Keuangan Tahunan Perseroan untuk tahun buku yang berakhir pada tanggal 31 Desember 2025. Audit Services : Audit of the company's Annual Financial Statements for the financial year ended December 31, 2025
Biaya Cost	Rp2.000.000.000 (diluar PPN 11% dan OPE 5%) untuk jasa audit atas Laporan Keuangan periode 31 Desember 2025 Rp2,000,000,000 (exclude VAT 11% and OPE 5%) for audit services of Financial Statements as of December 31, 2025

Lembaga dan Profesi Penunjang Perusahaan

Company Supporting Institution and Profession

Perseroan didukung oleh berbagai lembaga serta profesi penunjang yang berperan dalam memastikan kepatuhan terhadap ketentuan pasar modal dan praktik tata kelola perusahaan yang baik. Rincian lembaga dan profesi penunjang tersebut disajikan dalam tabel berikut:

Information regarding the Public Accounting Firm that provided audit and related services to the Company during the reporting period is summarized in the following table:

Lembaga Institution	Nama Name	Alamat Address	Jasa yang Diberikan Service Provided	Periode Penugasan Assignment Period
Notaris Notary	Dr. Agung Iriantoro SH.,MH.	Jl. Jati Padang Raya 13 A, Pasar Minggu, Jakarta Selatan Telp. (021) 7823625, Fax, 7823626 Email : agungiriantoro19@gmail.com	Pembuatan akta dan perjanjian Making deeds and agreements	Tahun 2025 In 2025
Biro Administrasi Efek Securities Administration Bureau	PT Ficomindo Buana Registrar	Gd. Wisma Bumiputera Lt.6 Jl. Jend. Sudirman Kav. 75 Jakarta Pusat - 12910 Telp : (021) 5260-982, 5260-983 Web: www.ficomindo.com	Pengelolaan Administrasi Efek Perseroan Company Securities Administration Management	Tahun 2025 In 2025
Bursa Saham Stock Exchange	Bursa Efek Indonesia (BEI) Indonesia Stock Exchange (IDX)	Gedung Bursa Efek Indonesia, Tower 1 Jl. Jend. Sudirman Kav 52-53 Jakarta 12190 Telp: (62-21) 5150515 Fax: (62-21) 5154153 Web: www.idx.co.id	Jasa Pencatatan Tahunan Saham Annual Stock Recording Services	Tahun 2025 In 2025
Kustodian	PT Kustodian Sentral Efek Indonesia (KSEI) The Indonesia Central Securities Depository (KSEI)	Gedung Bursa Efek Indonesia Tower 1 Lantai 5 Jl. Jend. Sudirman Kav 52-53 Jakarta 12190 Telp: (62-21) 5152855 Web: www.ksei.co.id	Pengelolaan Administrasi Efek Securities Administration Management	Tahun 2025 In 2025

Informasi pada Situs Web Perusahaan

Information on the Company's Website

Sebagai bagian dari komitmen terhadap keterbukaan informasi dan transparansi publik, Perseroan mengelola situs web resmi di www.bankneocommerce.co.id yang diperbarui secara berkala. Pengelolaan situs web ini merupakan wujud kepatuhan Perseroan terhadap Peraturan Otoritas Jasa Keuangan No. 8/POJK.04/2015 tentang Situs Web Emiten atau Perusahaan Publik. Melalui situs web tersebut, nasabah dan masyarakat luas dapat mengakses berbagai informasi yang relevan mengenai Perseroan.

As part of its commitment to information disclosure and public transparency, the Company manages and regularly updates its official website at www.bankneocommerce.co.id. The management of this website demonstrates the Company's compliance with Financial Services Authority Regulation No. 8/POJK.04/2015 regarding the Websites of Issuers or Public Companies. Through this website, customers and the general public can access various relevant information regarding the Company.

Perseroan secara berkelanjutan melakukan penyempurnaan terhadap tampilan dan konten situs web agar semakin informatif, mudah diakses, mudah dinavigasi, serta ramah bagi seluruh pengguna. Situs web BNC tersedia dalam dua pilihan bahasa, yaitu Bahasa Indonesia dan Bahasa Inggris, guna menjangkau pemangku kepentingan yang lebih luas. Upaya ini mencerminkan komitmen Perseroan untuk terus meningkatkan penerapan Prinsip Keterbukaan sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.

The Company continuously improves the design and content of the website to make it more informative, accessible, easy to navigate, and user-friendly for all users. BNC's website is available in two languages, Bahasa Indonesia and English, with the aim of reaching a broader range of stakeholders. This initiative reflects the Company's commitment to continuously enhance the implementation of Transparency Principles in accordance with applicable laws and regulations.

Dalam rangka mendukung penerapan tata kelola perusahaan yang baik (*good corporate governance*), khususnya terkait penyediaan akses informasi yang komprehensif, situs web resmi BNC dirancang sebagai sarana utama bagi pemegang saham, nasabah, masyarakat, pemerintah, serta pemangku kepentingan lainnya untuk memperoleh informasi mengenai kinerja dan aktivitas Perseroan.

To support the implementation of good corporate governance, particularly regarding the provision of comprehensive information access, BNC's official website is designed as the primary platform for shareholders, customers, the public, the government, and other stakeholders to obtain information regarding the Company's performance and activities.

Secara garis besar, informasi yang tersedia pada situs web Perseroan meliputi:

In general, the information available on the Company's website includes:

Individual	Rekening Account
	Tabungan dan Deposito Savings and Time Deposits
	Pinjaman Lending
	Pembayaran Transaction
	Layanan Lainnya Other Services
	Promo dan Campaign Promo and Campaign
	Biaya dan Tarif Fees and Charges
Korporasi Corporate	Simpanan Deposit
	Pinjaman Lending
	Cash Management
	API Banking
	Tarif & Biaya Fees & Charges

Informasi Perusahaan Company Information	Tentang BNC About BNC
	Manajemen Management
	Struktur Organisasi Organizational Structure
	Hubungan Investor Investor Relation
	Anggaran Dasar Article of Association
	Tata Kelola Perusahaan Corporate Governance
	Mitra Partners
	Karier Careers
Berita & Artikel News & Article	Berita News
	Artikel Article

Selain itu, pada situs web BNC tersedia layanan *Whistleblowing System* dan kanal komunikasi sebagai sarana bagi pemangku kepentingan untuk menyampaikan pesan, dan/atau pertanyaan kepada Perseroan.

In addition, BNC's website also provides a Whistleblowing System and communication channels as a platform for stakeholders to submit messages and/or questions to the Company.

Penghargaan dan Sertifikasi
Awards and Certifications

Penghargaan Awards

Tanggal Penghargaan Award Date	Nama Penghargaan Award Name	Nama Acara Event Name	Diberikan oleh Awarded by
Januari 2025 January 2025	Peringkat 3 Bank Terbaik dengan Layanan Digital The 3rd Best Bank with Digital Services	Satisfaction, Loyalty & Engagement (SLE) 2025	Infobank
Mei 2025 May 2025	Peringkat 2 Performa Terbaik dalam Pelayanan Prima Bank Digital 2nd Best Performance in Customer Service by Digital Banks	Bank Service Excellence 2025	Infobank
	Peringkat 2 Performa Terbaik Social Media Bank Digital 2nd Best Social Media Performance by Digital Banks	Bank Service Excellence 2025	Infobank
	Peringkat 3 Performa Terbaik Call Center Bank Digital 3rd Best Call Center Performance by Digital Banks	Bank Service Excellence 2025	Infobank
	Peringkat 2 Performa Terbaik Mobile Banking Bank Digital 2nd Best Mobile Banking Performance by Digital Banks	Bank Service Excellence 2025	Infobank
	Peringkat 1 Performa Terbaik Opening Account via Mobile Application/Web Browser Bank Digital Best Performance in Account Opening via Mobile App/ Web Browser by Digital Banks	Bank Service Excellence 2025	Infobank
	Peringkat 5 Performa Terbaik Website Bank Digital 5th Best-Performing Digital Bank Websites	Bank Service Excellence 2025	Infobank
	Peringkat 4 Performa Terbaik Layanan Email Bank Digital 4th Best-Performing Digital Bank Email Services	Bank Service Excellence 2025	Infobank
November 2025	Top Digital Financial Award 2025: Bank Swasta Tbk	Digital Financial Awards 2025	Media Asuransi
	Top Digital Financial Award 2025: Bank Digital	Digital Financial Awards 2025	Media Asuransi
Desember 2025 December 2025	Penghargaan Keuangan Digital Terbaik 2025 untuk Penyediaan Pengalaman Keuangan yang Disesuaikan Melalui Layanan Pembiayaan Online yang Terpercaya Best Digital Finance 2025 for Providing Personalized Financial Experience through Reliable Online Financing	Best Digital Finance Awards 2025	Warta Ekonomi
Desember 2025 December 2025	Perbankan Digital Populer Popular Digital Banking	Disway Award 2025	Disway.id

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Tinjauan Pendukung Bisnis

Business Support Overview


neo

Sumber Daya Manusia
Human Resources



Pengelolaan Sumber Daya Manusia

Perseroan meyakini bahwa keberadaan sumber daya manusia (SDM) yang kompeten, berintegritas, dan memiliki loyalitas tinggi merupakan fondasi penting dalam menjaga keberlanjutan usaha sekaligus mendorong percepatan pencapaian visi dan misi Perseroan. Di tengah dinamika industri perbankan yang terus berkembang, BNC memandang pengelolaan SDM yang tepat sebagai kunci untuk membentuk talenta yang adaptif, berkualitas, dan siap menghadapi berbagai perubahan.

Pengelolaan SDM dilakukan melalui upaya peningkatan kapasitas dan kualitas karyawan secara berkelanjutan, dengan menerapkan strategi yang terarah dan relevan dengan kebutuhan organisasi. Pendekatan ini bertujuan untuk meningkatkan produktivitas kerja sekaligus memastikan setiap karyawan mampu memberikan layanan terbaik kepada nasabah.

Human Resources Management

The Company believes that competent, integrity-driven, and highly loyal human resources (HR) are a essential foundation in maintaining business sustainability while accelerating the achievement of the Company's vision and mission. Amidst the ever-evolving dynamics of the banking industry, BNC considers appropriate HR management to be the key to fostering adaptive, high-quality talents who are ready to face various changes.

HR management is carried out through continuous efforts to enhance employee capacity and quality through the implementation of targeted strategies in line with the needs of the organization. This approach aims to boost work productivity while ensuring every employee is capable of providing the best service to customers.

Perencanaan dan pelaksanaan pengelolaan SDM diselaraskan dengan rencana bisnis serta kondisi terkini Perseroan. Pengembangan SDM dilakukan secara menyeluruh dan terukur melalui program pendidikan dan pelatihan, baik yang bersifat formal maupun nonformal. Melalui program tersebut, Perseroan berupaya membentuk insan BNC yang berdaya saing tinggi, memiliki kinerja unggul, serta mampu menyampaikan gagasan secara konstruktif, sehingga pengelolaan dan pelayanan Bank dapat berjalan optimal di seluruh lini bisnis.

Pembahasan mengenai pengelolaan SDM dalam Laporan Tahunan ini juga terintegrasi dengan Laporan Keberlanjutan yang disusun dalam satu publikasi. Pembaca diharapkan dapat menelaah Laporan Keberlanjutan untuk memperoleh gambaran yang lebih komprehensif terkait upaya Perseroan dalam mengembangkan SDM sepanjang tahun 2025.

Kebijakan Strategis Pengelolaan SDM

Perseroan berkomitmen menerapkan pengelolaan SDM secara konsisten dan berkesinambungan, mulai dari proses rekrutmen, pengembangan kompetensi, perencanaan karier, peningkatan kesejahteraan karyawan, hingga penguatan budaya kerja. Seluruh kebijakan tersebut dirancang dengan mengacu pada rencana jangka panjang dan arah strategis bisnis Perseroan.

Pada tahun 2025, Perseroan menyusun dan mengimplementasikan berbagai strategi pengelolaan SDM yang difokuskan pada peningkatan kompetensi karyawan, antara lain melalui program pendidikan, pelatihan, dan pengembangan sebagai berikut:

1. Peningkatan kompetensi teknis dan nonteknis bagi staf dan pimpinan pada tingkat manajerial.
2. Pengembangan kapasitas Pemimpin unit bisnis dan level strategis melalui program pendidikan dan pengembangan berbasis *Balanced Scorecard*.
3. Pemenuhan sertifikasi wajib sesuai dengan jenjang jabatan, seperti Sertifikasi Manajemen Risiko, Kepatuhan, Treasury, dan sertifikasi lain yang relevan dengan kebutuhan Bank.

The planning and implementation of HR management are aligned with the Company's business plans and current conditions. HR development is carried out comprehensively and measurably through education and training programs, both formal and informal. Through these programs, the Company strives to develop BNC personnel to be highly competitive, perform excellently, and are able to communicate ideas constructively, thereby enabling the Bank's management and services to operate optimally across all business lines.

The discussion on HR management in this Annual Report is also integrated with the Sustainability Report, which is compiled into a single publication. Readers are encouraged to review the Sustainability Report to gain a more comprehensive understanding of the Company's efforts in developing its workforce throughout 2025.

Strategic Human Resources Management Policies

The Company is committed to implementing human resources management consistently and sustainably, from the recruitment process, competency development, career planning, and improvement of employee welfare, to the strengthening of work culture. All of these policies are designed based on the Company's long-term plans and strategic business direction.

In 2025, the Company formulated and implemented various HR management strategies that focused on improving employee competencies, including through the following education, training, and development programs:

1. Improvement of technical and non-technical competencies for staff and leaders at the managerial level.
2. Capacity building of Business unit leaders and strategic-level leaders through education and development programs based on the Balanced Scorecard.
3. Fulfillment of mandatory certifications according to job levels, such as Risk Management, Compliance, Treasury certifications, and other certifications relevant to the Bank's needs.

Sebagai tindak lanjut atas strategi tersebut, Perseroan melaksanakan berbagai program pengelolaan dan pengembangan SDM, meliputi:

1. Penyelenggaraan *town hall* secara berkala untuk memperkuat komunikasi dan sinergi internal.
2. Pelatihan kepemimpinan bagi Kepala Divisi dan Kepala Cabang.
3. Pelaksanaan *wellness development program* berupa kegiatan olahraga dan pelatihan motivasi guna mengembangkan kompetensi non teknis karyawan.
4. *Culture Immersive Training* yang membahas nilai-nilai inti Bank Neo Commerce bagi staf dan pimpinan.
5. Pelatihan keterampilan penjualan dan layanan nasabah, termasuk *product knowledge*, *selling and marketing skills*, *market analysis*, *communication skills*, *presentation skills*, *negotiation skills*, dan *service excellence*.
6. Pelatihan sistem dan prosedur operasional untuk meningkatkan efisiensi layanan dan meminimalkan potensi kesalahan (*zero defect*), mencakup pemahaman sistem, prosedur, kompetensi digital, dan informasi produk.
7. Pelatihan wajib nonsertifikasi, yang meliputi:
   a. Pelatihan Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme;
   b. Pelatihan *Business Continuity Plan*;
   c. Pelatihan *Anti Fraud Awareness*;
   d. Pelatihan *Cyber Security Awareness*.
8. Peningkatan kompetensi melalui pelatihan sertifikasi wajib, antara lain:
   a. Bidang Manajemen Risiko
      i. Keikutsertaan karyawan dalam Sertifikasi Manajemen Risiko sesuai jenjang jabatan;
      ii. Pengembangan kompetensi melalui pelatihan internal dan eksternal;
      iii. Penguatan kesadaran risiko (*risk awareness*) bagi seluruh karyawan.
   b. Bidang *Wealth Management*
      i. Keikutsertaan dalam sertifikasi WPPE-P, AAUI, dan AAJI;
      ii. Pelatihan pengembangan kompetensi internal dan eksternal;
      iii. Peningkatan pemahaman karyawan terhadap produk, strategi, dan pengelolaan *wealth management*.
   c. Bidang Sistem Pembayaran
      Keikutsertaan dalam Pelatihan Berbasis Kompetensi Sistem Pembayaran dan Pengelolaan Uang Rupiah (PBK SPPUR) serta sertifikasi pengelolaan transfer dana, uang tunai, dan setelmen transaksi treasury sesuai level jabatan.

As a follow-up to these strategies, the Company implements various HR management and development programs, including:

1. Holding regular town hall sessions to enhance internal communication and synergy.
2. Leadership training for Division Heads and Branch Managers.
3. Implementation of a wellness development program consisting of sports activities and motivational training to develop employees' non-technical competencies.
4. Culture Immersive Training covering Bank Neo Commerce's core values for staff and leadership.
5. Sales and customer service skills training, including product knowledge, selling and marketing skills, market analysis, communication skills, presentation skills, negotiation skills, and service excellence.
6. Training on operational systems and procedures to improve service efficiency and minimize potential errors (zero defect), covering system understanding, procedures, digital competencies, and product information.
7. Mandatory non-certification training, which includes:
   a. Training on Anti-Money Laundering and Counter-Terrorism Financing;
   b. Training on Business Continuity Plans;
   c. Training on Anti-Fraud Awareness;
   d. Training on Cyber Security Awareness.
8. Competency development through mandatory certification training, including:
   a. Risk Management
      i. Employee participation in Risk Management Certification according to job level;
      ii. Competency development through internal and external training;
      iii. Improving risk awareness for all employees.
   b. Wealth Management
      i. Participation in WPPE-P, AAUI, and AAJI certifications;
      ii. Internal and external competency development training;
      iii. Enhancing employees' understanding of products, strategies, and wealth management operations.
   c. Payment System Division
      Participation in Competency-Based Training on Payment Systems and Rupiah Cash Management (PBK SPPUR) as well as certifications in fund transfer management, cash handling, and treasury transaction settlement according to job level.

Seluruh program tersebut dirancang untuk memastikan SDM Perseroan tetap adaptif, kompeten, dan mampu mendukung kebutuhan bisnis sepanjang tahun 2025.

Sistem Rekrutmen dan Seleksi

Perseroan memandang sistem rekrutmen dan seleksi yang efektif sebagai fondasi utama dalam membangun kualitas SDM ke depan. Oleh karena itu, perencanaan dan pelaksanaan proses rekrutmen dilakukan secara cermat, terutama di tengah transformasi Perseroan menuju bank dengan layanan digital yang turut mempengaruhi proses seleksi serta penyesuaian jumlah karyawan.

Untuk menjamin efektivitas proses tersebut, Perseroan memiliki tim rekrutmen khusus yang menjalankan seluruh tahapan seleksi melalui berbagai saluran, antara lain portal pekerjaan seperti LinkedIn dan kerja sama dengan agensi perekrutan. Seluruh proses rekrutmen dilaksanakan secara terbuka, objektif, dan profesional, berdasarkan persyaratan serta kriteria yang telah ditetapkan, tanpa membedakan suku, agama, ras, golongan, maupun aspek diskriminatif lainnya.

Selama tahun 2025, tim rekrutmen melaksanakan berbagai kegiatan, antara lain:
1. Proses rekrutmen menyeluruh (*end-to-end*), mulai dari publikasi lowongan, *headhunting*, penawaran kerja, hingga proses *onboarding*.
2. Pelaksanaan seleksi massal untuk sejumlah posisi tertentu.
3. Kerja sama dengan beberapa agensi perekrutan.
4. Pengembangan program referensi karyawan untuk posisi-posisi tertentu.

Melalui pendekatan tersebut, Perseroan berkomitmen memastikan proses rekrutmen dan seleksi berjalan transparan, efektif, dan selaras dengan kebutuhan bisnis di era digital.

Demografi Karyawan

Per 31 Desember 2025, Perseroan mempekerjakan sebanyak 933 karyawan. Jumlah ini mencerminkan pengelolaan tenaga kerja yang disesuaikan dengan kebutuhan organisasi serta strategi bisnis yang dijalankan. Dinamika jumlah karyawan menunjukkan upaya Perseroan dalam mengoptimalkan pengelolaan SDM seiring transformasi digital dan penyesuaian terhadap tuntutan bisnis yang terus berkembang.

All these programs are designed to ensure the Company's human resources remain adaptable, competent, and capable of supporting business needs through 2025.

Recruitment and Selection System

The Company regards an effective recruitment and selection system as the main foundation in building future HR quality. Therefore, the planning and implementation of the recruitment process are carried out meticulously, especially amid the Company's transformation into a bank with digital services, which also influences the selection process and adjustments to the number of employees.

To ensure the effectiveness of this process, the Company has a dedicated recruitment team that manages all selection stages through various channels, including job portals such as LinkedIn and partnerships with recruitment agencies. The entire recruitment process is conducted openly, objectively, and professionally, based on established requirements and criteria, regardless of ethnicity, religion, race, social group, or other discriminatory factors.

During 2025, the recruitment team carried out various activities, including:
1. A comprehensive (end-to-end) recruitment process, starting from job postings, headhunting, job offers, to the onboarding process.
2. Conducting mass selection for certain positions.
3. Collaborating with several recruitment agencies.
4. Development of an employee referral program for specific positions.

Through this approach, the Company is committed to ensuring that the recruitment and selection processes are transparent, effective, and aligned with business needs in the digital era.

Employee Demographics

As of December 31, 2025, the Company had 933 employees. This number is a reflection of workforce management that is tailored to the needs of the organization and the business strategies being implemented. The dynamics of the employee headcount demonstrate the Company's efforts to optimize HR management in line with digital transformation and adaptation to evolving business demands.

Dengan pendekatan yang menekankan efisiensi dan inovasi, Perseroan memastikan bahwa komposisi tenaga kerja yang dimiliki mampu mendukung pencapaian visi dan misi jangka panjang. Informasi lebih rinci mengenai jumlah dan komposisi karyawan Perseroan selama tiga tahun terakhir disajikan dalam tabel berikut:

With an approach that emphasizes efficiency and innovation, the Company ensures that its workforce composition is capable of supporting the achievement of its long-term vision and mission. More detailed information regarding the number and composition of the Company's employees over the past three years is presented in the following table:

Jumlah Karyawan Berdasarkan Gender
Number of Employees by Gender

Gender Gender	2025		2024		2023	
	Jumlah Karyawan Total Employees	**Komposisi** Composition (%)	**Jumlah Karyawan** Total Employees	**Komposisi** Composition (%)	**Jumlah Karyawan** Total Employees	**Komposisi** Composition (%)
Laki-Laki Male	488	52,30	620	51,32	512	51,30
Perempuan Female	445	47,70	588	48,68	486	48,70
Jumlah Total	933	100,00	1.208	100,00	998	100,00

Jumlah Karyawan Berdasarkan Level Organisasi
Number of Employees by Organizational Level

Jenjang Manajerial Managerial Level	2025		2024		2023	
	Jumlah Karyawan Total Employees	**Komposisi** Composition (%)	**Jumlah Karyawan** Total Employees	**Komposisi** Composition (%)	**Jumlah Karyawan** Total Employees	**Komposisi** Composition (%)
Manajemen Puncak Top Management	3	0,32	3	0,25	3	0,30
Manajemen Madya Executive Management	25	2,68	27	2,24	38	3,81
Manajemen Pelaksana Officer Management	165	17,68	191	15,81	162	16,23
Pelaksana Staff	740	79,30	987	81,71	795	79,66
Jumlah Total	933	100,00	1.208	100,00	998	100,00

Jumlah Karyawan Berdasarkan Usia
Number of Employees by Age

Jenjang Usia Ages Level	2025		2024		2023	
	Jumlah Karyawan Total Employees	Komposisi Composition (%)	Jumlah Karyawan Total Employees	Komposisi Composition (%)	Jumlah Karyawan Total Employees	Komposisi Composition (%)
> 50 Tahun More than 50	18	1,93	18	1,49	14	5,61
41–50 Tahun 41 - 50 Years	116	12,43	128	10,6	103	79,86
31–40 Tahun 31 - 40 Years	344	36,87	382	31,62	329	6,71
s.d. 30 Tahun Until 30 Years	455	48,77	680	56,29	552	7,82
Jumlah Total	933	100,00	1.208	100,00	998	100,00

Jumlah Karyawan Berdasarkan Tingkat Pendidikan
Number of Employees by Educational Level

Tingkat Pendidikan Level of Education	2025		2024		2023	
	Jumlah Karyawan Total Employees	Komposisi Composition (%)	Jumlah Karyawan Total Employees	Komposisi Composition (%)	Jumlah Karyawan Total Employees	Komposisi Composition (%)
Pascasarjana (S2) Master Bachelor (S2)	47	5,04	57	4,72	56	5,61
Sarjana (S1) Bachelor Degree (S1)	726	77,81	942	77,98	797	79,86
Diploma (D1-D3) Associate Degree (D1-D3)	64	6,86	64	5,39	67	6,71
Non-Diploma Non-Diploma	96	10,29	145	12	78	7,82
Jumlah Total	933	100	1.208	100,00	998	100,00

Jumlah Karyawan Berdasarkan Status Karyawan
Number of Employees by Employment Status

Status Karyawan Employee Status	2025		2024		2023	
	Jumlah Karyawan Total Employees	Komposisi Composition (%)	Jumlah Karyawan Total Employees	Komposisi Composition (%)	Jumlah Karyawan Total Employees	Komposisi Composition (%)
Pegawai Tetap Permanent Employee	516	55,31	626	51,25	579	58,02
Pegawai Kontrak Contract Employee	417	44,69	582	48,18	419	41,98
Jumlah Total	933	100,00	1.208	100,00	998	100,00

S-01 Kesetaraan Gender
S-01 Gender Equality

Jumlah Level Employee Level	Laki-laki Male		Perempuan Female	
	Jumlah Pegawai Total Employees	Persentase Pegawai (%) Employee Percentage (%)	Jumlah Pegawai Total Employees	Persentase Pegawai (%) Employee Percentage (%)
Entry-Level	359	73,57	381	85,62
Mid-Level	113	23,16	52	11,69
Senior-Level	13	2,66	12	2,70
Executive -Level	3	0,61	0	0,00
Total Pegawai Total Employee	488	100,00	445	100,00

S-02 Jumlah Level Pegawai yang dimiliki oleh laki-laki dan perempuan berdasarkan kelompok umur
S-02 Total Employee Level occupied by male and female by age group

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

S-04 Jumlah Pegawai Sementara
S-04 Total Contract Employees

Uraian Description	Jumlah Pegawai (dalam tahun pelaporan) Total Employees (in the reporting year)	Percentage Pegawai (dalam tahun pelaporan) Employee Percentage (in the reporting year)
Jumlah Pegawai Perusahaan yang dipegang oleh Kontraktor/konsultan Total Company Employees under Contractors/consultants	145	15,33%

Tingkat Perputaran Karyawan

Tingkat perputaran karyawan merupakan salah satu indikator penting dalam pengelolaan SDM di Perseroan. Sebagai bagian dari industri perbankan yang kompetitif, Perseroan menyadari bahwa perputaran karyawan merupakan dinamika yang tidak sepenuhnya dapat dihindari. Namun demikian, Perseroan secara berkelanjutan berupaya meminimalkan dampaknya melalui strategi pengelolaan SDM yang menjaga keseimbangan antara kebutuhan organisasi dan kompetensi tenaga kerja.

Employee Turnover Rate

Employee turnover rate is one of the key indicators in the Company's human resources management. As part of the competitive banking industry, the Company recognizes that employee turnover is a dynamic that cannot be entirely avoided. However, the Company continuously strives to minimize its impact through human resources management strategies that maintain a balance between organizational needs and workforce competencies.

Pada tahun 2025, tingkat perputaran karyawan Perseroan tercatat sebesar 49,20%. Sebagai perbandingan, tingkat perputaran karyawan pada tahun 2024 mencapai 27,57%, sedangkan pada tahun 2023 sebesar 76,75%. Data tersebut mencerminkan dinamika pengelolaan SDM yang dipengaruhi oleh berbagai faktor, termasuk persaingan industri, perubahan strategi bisnis, serta kebutuhan akan tenaga kerja yang semakin adaptif dan berkualitas. Rincian tingkat perputaran karyawan Perseroan selama tiga tahun terakhir disajikan dalam tabel berikut:

In 2025, the Company's employee turnover rate stood at 49.20%. By comparison, the employee turnover rate in 2024 was 27.57%, compared to 76.75% in 2023. This data reflects the dynamics of human resources management, which are influenced by various factors, including industry competition, changes in business strategy, and the need for a workforce that is increasingly adaptable and high-quality. Details of the Company's employee turnover rate over the past three years are presented in the following table:

Uraian Description	**2025**		2024		2023	
	Jumlah Karyawan Amount Employees	**Komposisi** Composition (%)	**Jumlah Karyawan** Amount Employees	**Komposisi** Composition (%)	**Jumlah Karyawan** Amount Employees	**Komposisi** Composition (%)
Berakhir Kontrak End of Contract	184	40,09	62	18,62	355	46,34
Mengundurkan Diri Resign	225	49,02	245	73,57	383	50
Pensiun Retired	4	0,87	1	0,3	2	0,26
PHK Laid Off	43	9.37	25	7,51	26	3,39
Tutup Cabang Close Branches	3	0,65	0	0	0	0
Jumlah Total	459	100	333	100	766	100
Tingkat Perputaran Karyawan Employee Turnover Rate	49,20%		27,57%		76,75%	

S-03 Tingkat Pergantian Pegawai
S-03 Employee Turnover Rate

Uraian Description	**Jumlah Pegawai (dalam tahun pelaporan)** Total Employees (in the reporting year)	**Percentage Pegawai (dalam tahun pelaporan** Employee Percentage (in the reporting year)
Jumlah Pegawai Resign/Pemutusan Hubungan Kerja Number of Employees Who Resigned/ Were Terminated	459	49,20%
Jumlah Pegawai Baru/Pengganti Number of New/Replacement Employees	184	19,72%

Kesetaraan

Perseroan menjadikan prinsip kesetaraan sebagai landasan penting dalam pengelolaan sumber daya manusia. Dalam seluruh aktivitas operasional, BNC memastikan bahwa setiap individu memperoleh peluang yang sama untuk berkarir dan berkembang tanpa memandang latar belakang suku, agama, ras, golongan, jenis kelamin, maupun faktor diskriminatif lainnya. Seluruh proses rekrutmen, seleksi, hingga pengembangan karyawan dilaksanakan secara objektif, transparan, dan berbasis kompetensi serta kebutuhan organisasi.

Penerapan prinsip kesetaraan tidak hanya tercermin dalam proses rekrutmen, tetapi juga dalam pemberian manfaat dan fasilitas kepada karyawan. Remunerasi, jaminan kesehatan, program pengembangan kompetensi, sarana kerja, hingga kesempatan promosi diberikan berdasarkan tanggung jawab dan kinerja individu. Pendekatan ini bertujuan menciptakan lingkungan kerja yang adil, sekaligus mendorong karyawan untuk memberikan kontribusi terbaiknya.

Kesetaraan gender juga menjadi perhatian utama Perseroan, yang tercermin dalam komposisi karyawan di berbagai jenjang organisasi. Pada tahun 2025, proporsi karyawan laki-laki tercatat sebesar 52,30%, sementara karyawan perempuan mencapai 47,70%. Sebagai perbandingan, pada tahun 2024 komposisi karyawan laki-laki dan perempuan masing-masing sebesar 51,32% dan 48,68%, sedangkan pada tahun 2023 tercatat 51,30% karyawan laki-laki dan 48,70% karyawan perempuan. Data tersebut menunjukkan komitmen Perseroan dalam menjaga keseimbangan gender dan membangun keberagaman yang inklusif.

Melalui penerapan prinsip kesetaraan secara konsisten, Perseroan berupaya membentuk lingkungan kerja yang inklusif dan suportif, sehingga setiap karyawan dapat berkembang secara optimal dan berkontribusi secara berkelanjutan terhadap kinerja Perseroan.

Equality

The Company upholds the principle of equality as a key foundation of its human resources management. In all operational activities, BNC ensures that every individual has equal opportunities for career advancement and development, regardless of ethnicity, religion, race, social group, gender, or any other discriminatory factors. All processes—from recruitment and selection to employee development—are conducted objectively, transparently, and based on competence and organizational needs.

The application of the principle of equality is reflected not only in the recruitment process but also in the provision of benefits and facilities to employees. Remuneration, health insurance, competency development programs, work facilities, and promotion opportunities are granted based on individual responsibilities and performance. This approach aims to create a fair work environment while encouraging employees to give their best contributions.

Gender equality is also a key concern for the Company, as reflected in the employee composition across various organizational levels. In 2025, the proportion of male employees stood at 52.30%, while female employees accounted for 47.70%. By comparison, the composition of male and female employees in 2024 was 51.32% and 48.68%, respectively, while in 2023 it stood at 51.30% male employees and 48.70% female employees. This data demonstrates the Company's commitment to maintaining gender balance and fostering inclusive diversity.

Through the consistent application of equality principles, the Company strives to create an inclusive and supportive work environment, so that every employee can develop optimally and contribute sustainably to the Company's performance.

Pengembangan Kompetensi Karyawan

Perseroan memandang pengembangan kompetensi karyawan sebagai elemen strategis dalam pengelolaan sumber daya manusia. Oleh karena itu, BNC secara berkelanjutan menyelenggarakan berbagai program pendidikan dan pelatihan untuk meningkatkan profesionalisme dan kapabilitas karyawan. Program-program tersebut dilaksanakan dengan melibatkan unit internal terkait serta pihak eksternal, seperti lembaga profesional yang dipilih berdasarkan relevansi materi dan kualitas pelatihan.

Selain pengembangan kompetensi secara umum, Perseroan memberikan perhatian khusus pada peningkatan kapabilitas organ tata kelola dan jajaran manajerial. Pelatihan bagi organ tata kelola difokuskan pada penguatan pemahaman regulasi dan penerapan praktik terbaik tata kelola perusahaan. Sementara itu, program pengembangan bagi level manajerial dirancang untuk memperkuat kepemimpinan dan kompetensi strategis guna mendukung pertumbuhan usaha dan keberlanjutan bisnis.

Sepanjang tahun 2025, Perseroan menyelenggarakan sebanyak 374 kegiatan pengembangan kompetensi yang diikuti oleh total 14.491 peserta. Sebagai perbandingan, pada tahun 2024 terdapat 516 kegiatan dengan 13.070 peserta, sementara pada tahun 2023 terdapat 448 kegiatan dengan 9.728 peserta. Peningkatan ini mencerminkan komitmen Perseroan dalam mengelola dan mengembangkan kompetensi SDM secara berkesinambungan.

Untuk mendukung pelaksanaan program tersebut, Perseroan merealisasikan biaya pengembangan kompetensi sebesar Rp5.813 juta pada tahun 2025. Nilai ini lebih rendah dibandingkan realisasi tahun 2024 sebesar Rp6.112 juta dan tahun 2023 sebesar Rp8.884 juta, seiring dengan adanya penyesuaian rencana pengembangan Bank.

Employee Competency Development

The Company regards employee competency development as a strategic element in human resource management. Therefore, BNC continuously conducts various education and training programs to enhance employees' professionalism and capabilities. These programs are realized by involving relevant internal units as well as external parties, such as professional institutions selected based on the relevance of the material and the quality of the training.

In addition to general competency development, the Company pays special attention on the capability development of the governance organs and the managerial ranks. Training for governance organs is focused on strengthening understanding of regulations and the application of best corporate governance practices. Meanwhile, development programs for the managerial level are designed to strengthen leadership and strategic competencies to support business growth and sustainability.

Throughout 2025, the Company organized a total of 374 competency development activities attended by 14,491 participants. By comparison, in 2024 there were 516 activities with 13,070 participants, while in 2023 there were 448 activities with 9,728 participants. This increase reflects the Company's commitment to managing and developing human resources competencies on an ongoing basis.

To support the implementation of these programs, the Company allocated Rp5.813 million for competency development in 2025. This amount is lower than the 2024 allocation of Rp6,112 million and the 2023 allocation of Rp8,884 million, in line with adjustments to the Bank's development plan.

Informasi lebih rinci terkait program pengembangan kompetensi karyawan selama tiga tahun terakhir disajikan dalam tabel berikut:

More detailed information regarding employee competency development programs over the past three years is presented in the following table:

Uraian Description	2025		2024		2023	
	Jumlah Pelatihan Total Training Sessions	**Jumlah Peserta** Total Training Participants	**Jumlah Pelatihan** Total Training Sessions	**Jumlah Peserta** Total Training Participants	**Jumlah Pelatihan** Total Training Sessions	**Jumlah Peserta** Total Training Participants
Pelatihan Mandatory Mandatory Training	75	896	161	4.647	164	3.668
Pelatihan Technical Skill Technical Skill Training	172	6.798	140	1.757	177	177
Pelatihan Soft Skill Soft Skill Training	99	4.139	181	3.933	55	2.688
Pelatihan Leadership Leadership Training	14	1.693	8	2.313	22	176
Pelatihan Digital Competency Digital Competency Training	14	965	26	420	30	673
Jumlah Total	374	14.491	516	13.070	448	9.728

Penguatan Kapabilitas SDM dan Praktik Ketenagakerjaan yang Bertanggung Jawab [S-05, S-06, S-07, S-08, S-09, S-10, S-11]

Sepanjang tahun 2025, BNC menunjukkan komitmen yang kuat dalam pengembangan sumber daya manusia sebagai fondasi utama pertumbuhan berkelanjutan. Hal ini tercermin dari rata-rata jam pelatihan yang mencapai 72,79 jam per pegawai, dengan tingkat partisipasi yang sangat tinggi, yakni 97,23% atau sebanyak 913 pegawai telah mengikuti berbagai program pelatihan. Capaian ini menegaskan pendekatan Perseroan yang inklusif dan sistematis dalam meningkatkan kompetensi, kapabilitas, serta kesiapan pegawai dalam menghadapi dinamika industri keuangan yang terus berkembang.

Dari sisi keselamatan kerja, Perseroan mencatat nol kecelakaan kerja serta tidak terdapat insiden cedera serius maupun fatal sepanjang periode pelaporan. Kinerja ini mencerminkan penerapan praktik kerja yang aman dan terkendali, sekaligus menunjukkan efektivitas pengelolaan risiko operasional yang mendukung keberlangsungan aktivitas usaha.

Dalam aspek hak asasi manusia, Perseroan memastikan bahwa seluruh kegiatan operasional berjalan tanpa adanya pelanggaran HAM, dengan tidak terdapat kasus pelanggaran selama tahun

Enhancing HR Capabilities and Responsible Employment Practices [S-05, S-06, S-07, S-08, S-09, S-10, S-11]

Throughout 2025, BNC demonstrated a strong commitment to human resource development as the key foundation of sustainable growth. This is reflected in the average training hours at 72.79 hours per employee, with a very high participation rate of 97.23% or 913 employees participated in various training programs. This achievement emphasizes the Company's inclusive and systematic approach to enhancing employees' competencies, capabilities, and readiness to navigate the ever-evolving dynamics of the financial industry.

In terms of occupational safety, the Company recorded zero occupational accidents and no incidents of serious or fatal injuries throughout the reporting period. This performance reflects the implementation of safe and controlled work practices, while also demonstrating the effectiveness of operational risk management in supporting the continuity of business activities.

In the aspect of human rights, the Company ensures that all operational activities are conducted without any human rights violations, with no cases of violations occurring in 2025.

2025. Komitmen ini diperkuat melalui penerapan kebijakan internal yang mengatur perilaku dan hubungan kerja secara adil dan profesional. Perseroan telah memiliki kebijakan terkait pelecehan seksual dan non-diskriminasi, yang tertuang dalam Peraturan Perusahaan serta kebijakan internal SKEP/031/SET/BNC/III/2023 mengenai pelaksanaan sanksi dan pengenaan ganti rugi. Selain itu, kebijakan terkait larangan pekerja anak dan pekerja paksa juga telah diatur dalam Peraturan Perusahaan sebagai bentuk kepatuhan terhadap prinsip ketenagakerjaan yang bertanggung jawab.

Meskipun demikian, hingga akhir tahun pelaporan, Perseroan belum memiliki kebijakan khusus yang secara eksplisit mengatur hak asasi manusia secara terpisah, serta belum menetapkan kebijakan formal terkait kesehatan dan keselamatan kerja (K3) dalam bentuk dokumen tersendiri. Ke depan, Perseroan melihat hal ini sebagai area penguatan tata kelola yang akan terus dikembangkan secara bertahap, sejalan dengan peningkatan kompleksitas operasional dan ekspektasi pemangku kepentingan terhadap praktik keberlanjutan yang lebih komprehensif.

Penguatan Tata Kelola dan Integritas Manajemen [G-03, G-04, G-05, G-07, G-08, G-09]

Sepanjang tahun 2025, BNC terus memperkuat praktik tata kelola perusahaan yang baik melalui struktur manajemen yang independen serta penerapan kebijakan yang mendukung transparansi dan akuntabilitas. Komposisi Dewan Komisaris dan Direksi masing-masing terdiri dari 3 anggota, dengan 2 Komisaris Independen dan seluruh anggota Direksi berstatus independen, mencerminkan upaya Perseroan dalam menjaga objektivitas pengambilan keputusan. Dari sisi keberagaman, komposisi manajemen saat ini masih didominasi oleh laki-laki, yang ke depan menjadi salah satu area perhatian dalam mendorong keberagaman dan inklusivitas pada tingkat kepemimpinan.

Dalam mendukung efektivitas fungsi pengawasan dan pengelolaan, Perseroan secara rutin menyelenggarakan rapat Dewan Komisaris dan Direksi dengan tingkat kehadiran yang terjaga, sebagai bagian dari mekanisme pengambilan keputusan yang kolektif dan terukur. Hal ini memperkuat koordinasi strategis serta memastikan setiap keputusan bisnis selaras dengan prinsip kehati-hatian dan kepentingan jangka panjang Perseroan.

This commitment is reinforced through the implementation of internal policies governing fair and professional conduct and workplace relationships. The Company has established policies regarding sexual harassment and non-discrimination, which are outlined in the Company Regulations and internal policy SKEP/031/SET/BNC/III/2023 concerning the imposition of sanctions and compensation. Additionally, policies regarding the prohibition of child labor and forced labor are also stipulated in the Company Regulation as a form of compliance with responsible labor principles.

However, as of the end of the reporting year, the Company has not yet established a specific policy that explicitly addresses human rights separately, nor has it adopted a formal policy regarding occupational health and safety (OHS) as a separate document. Moving forward, the Company sees this as an area of governance strengthening that will continue to be developed gradually, in line with increasing operational complexity and stakeholder expectations for more comprehensive sustainability practices.

Strengthening Corporate Governance and Management Integrity [G-03, G-04, G-05, G-07, G-08, G-09]

Throughout 2025, BNC continues to strengthen good corporate governance practices through an independent management structure and the implementation of policies that support transparency and accountability. The Board of Commissioners and the Board of Directors each consist of 3 members, with 2 Independent Commissioners and all members of the Board of Directors are independent, reflecting the Company's efforts to maintain objectivity in decision-making. In terms of diversity, the current management composition remains male-dominated, which will be a key focus area in the future to promote diversity and inclusivity at the leadership level.

To support the effectiveness of oversight and management functions, the Company regularly convenes Board of Commissioners and Board of Directors meetings with consistent attendance, as part of a collective and measurable decision-making mechanism. These meetings strengthen strategic coordination and ensure that every business decision aligns with the principles of prudence and the Company's long-term interests.

Dari sisi kebijakan, Perseroan telah memiliki kerangka tata kelola yang memadai, termasuk kebijakan penilaian kinerja Direksi dan Dewan Komisaris yang mengacu pada Piagam Dewan Komisaris dan Piagam Direksi, yang dapat diakses melalui situs resmi Perseroan. Selain itu, Perseroan juga telah menetapkan Kode Etik melalui Surat Keputusan Direksi No. SKEP/015/SET/BNC/V/2021 serta kebijakan Anti Suap dan Anti Korupsi melalui Surat Keputusan No. SK/035-2/SET/BNC/VI/2021, sebagai landasan dalam membangun budaya integritas di seluruh lini organisasi.

In terms of policy, the Company has an adequate governance framework, including performance evaluation policies for the Board of Directors and the Board of Commissioners that refer to the Board of Commissioners Charter and the Board of Directors Charter, which are accessible via the Company's official website. Additionally, the Company has established a Code of Conduct through Board of Directors Decree No. SKEP/015/SET/BNC/V/2021 and Anti-Bribery and Anti-Corruption policies through Decree No. SK/035-2/SET/BNC/VI/2021, serving as the foundation for fostering a culture of integrity across all organizational levels.

Komitmen terhadap perlindungan pemegang saham dan pencegahan konflik kepentingan juga diwujudkan melalui kebijakan Insider Trading (SKEP/106/SET/BNC/X/2023) serta kebijakan Transaksi Afiliasi dan Benturan Kepentingan (SKEP/108/SET/BNC/I/2024). Kebijakan-kebijakan ini menjadi instrumen penting dalam memastikan bahwa setiap transaksi dan keputusan strategis dilakukan secara transparan, adil, serta mengedepankan kepentingan seluruh pemangku kepentingan.

Commitment to the protection of shareholders and the prevention of conflicts of interest is also demonstrated through the Insider Trading Policy (SKEP/106/SET/BNC/X/2023) and the Related-Party Transactions and Conflicts of Interest Policy (SKEP/108/SET/BNC/I/2024). These policies serve as crucial instruments in ensuring that every transaction and strategic decision is conducted transparently, fairly, and prioritizes the interests of all stakeholders.

Meskipun demikian, hingga akhir tahun pelaporan, Perseroan belum menetapkan kebijakan khusus mengenai pelatihan bagi Direksi dan Dewan Komisaris. Ke depan, aspek ini dipandang sebagai peluang penguatan tata kelola yang akan terus dikembangkan secara bertahap, sejalan dengan peningkatan kompleksitas bisnis dan ekspektasi terhadap praktik *good corporate governance* yang lebih komprehensif dan berstandar tinggi.

However, as of the end of the reporting year, the Company has not yet established formal policies regarding training for the Board of Directors and the Board of Commissioners. Moving forward, this aspect is viewed as an opportunity to strengthen corporate governance, which will be developed gradually in line with the increasing complexity of the business and expectations for more comprehensive and high-standard good corporate governance practices.

Dewan Komisaris

Board of Commissioners

Dalam rangka mendukung peningkatan kinerja Dewan Komisaris, Perseroan memberikan kesempatan kepada setiap anggota Dewan Komisaris untuk mengikuti berbagai program pengembangan kompetensi. Program tersebut meliputi pelatihan, sertifikasi, seminar, dan workshop yang relevan dengan peran pengawasan dan tata kelola.

To support the improvement of the Board of Commissioners' performance, the Company provides opportunities for each member of the Board of Commissioners to participate in various competency development programs. These programs include training, certification, seminars, and workshops relevant to oversight and governance roles.

Adapun daftar pendidikan dan/atau peningkatan kompetensi yang diikuti oleh Dewan Komisaris sepanjang tahun 2025 disajikan pada:

The list of education and/or competency development programs attended by the Board of Commissioners throughout 2025 is presented below:

No	Nama Name	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
1	Inkawan D. Jusi	*Refreshment* Manajemen Risiko Jenjang 7 Risk Management Level 7 Refreshment	Maisa Edukasi	22 April 2025 April 22, 2025	Jakarta
		Mandatory Training: Cyber Security Awareness For BOD & BOC	Punggawa Cybersecurity	30 September 2025 September 30, 2025	Jakarta
2	Kreisna D. Gozali	Pembekalan Manajemen Risiko Jenjang 6 Risk Management Level 6 Training	Maisa Edukasi	22 April 2025 April 22, 2025	Jakarta
		Mandatory Training: Cyber Security Awareness For BOD & BOC	Punggawa Cybersecurity	30 September 2025 September 30, 2025	Jakarta
3	Pramoda Dei Sudarmo	Pembekalan Manajemen Risiko Jenjang 7 Risk Management Level 7 Training	Maisa Edukasi	22 April 2025 April 22, 2025	Jakarta
		Mandatory Training: Cyber Security Awareness For BOD & BOC	Punggawa Cybersecurity	30 September 2025 September 30, 2025	Jakarta

Direksi

Perseroan secara konsisten mendorong Direksi untuk terus meningkatkan kompetensi dan kapasitas kepemimpinan melalui berbagai program pengembangan. Program tersebut mencakup pelatihan, sertifikasi, seminar, serta workshop yang mendukung efektivitas pengambilan keputusan dan pengelolaan bisnis.

Rincian pelatihan, pendidikan, dan/atau program peningkatan kompetensi yang diikuti oleh Direksi sepanjang tahun 2025 disajikan pada:

Board of Directors

The Company consistently encourages the Board of Directors to continuously enhance their competencies and leadership capabilities through various development programs. These programs include training, certification, seminars, and workshops that support effective decision-making and business management.

Details of the training, education, and/or competency enhancement programs attended by the Board of Directors throughout 2025 are presented below:

Nama Name	Program Pelatihan Training program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
Eri Budiono	*Leadership Communication - BNC 35th Anniversary*	Internal Bank	9 Januari 2025 January 9, 2025	Jakarta
	Leadership Communication - Balance Score Card Offsite Meeting	Internal Bank	31 Januari 2025 & 1 Februari 2025 January 31, 2025 & February 1, 2025	Jakarta
	Leadership Communication - Townhall HQ	Internal Bank	10 April 2025 April 10, 2025	Jakarta
	Refreshment Manajemen Risiko Jenjang 7 Risk Management Level 7 Refreshment	Maisa Edukasi	2 Mei 2025 May 2, 2025	Jakarta
	Leadership Communication: BNC Offsite Meeting 2H 2025	Internal Bank	7 & 8 Agustus 2025 August 7 & 8, 2025	Jakarta

Nama Name	Program Pelatihan Training program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
	Leadership Communication : BNC Townhall	Internal Bank	20 Agustus 2025 August 20, 2025	Jakarta
	Mandatory Training: Cyber Security Awareness For BOD & BOC	Punggawa Cybersecurity	30 September 2025 September 30, 2025	Jakarta
	AI Training & Workshop	PT Kinarya Media Digital (Digital Bank)	1 - 2 Oktober 2025 October 1 – 2, 2025	Jakarta
Aditya Wahyu Windarwo	*Leadership Communication - BNC 35th Anniversary*	Internal Bank	9 Januari 2025 January 9, 2025	Jakarta
	Training Refreshment Treasury Jenjang 7 Treasury Level 7 Refreshment Training	ACI FMA Indonesia	17 Januari 2025 January 17, 2025	Bali
	Leadership Communication - Balance Score Card Offsite Meeting	Internal Bank	31 Januari & 1 Februari 2025	Jakarta
	Townhall HQ	Internal Bank	10 April 2025 April 10, 2025	Jakarta
	Refreshment Manajemen Risiko Jenjang 7 Risk Management Level 7 Refreshment	Maisa Edukasi	22 April 2025 April 22, 2025	Jakarta
	Leadership Communication: BNC Offsite Meeting 2H 2025	Internal Bank	7 & 8 Agustus 2025 August 7 & 8, 2025	Jakarta
	Leadership Communication: BNC Townhall	Internal Bank	20 Agustus 2025 August 20, 2025	Jakarta
	Mandatory Training: Cyber Security Awareness For BOD & BOC	Punggawa Cybersecurity	30 September 2025 September 30, 2205	Jakarta
	AI Training & Workshop	PT Kinarya Media Digital (Digital Bank)	1 - 2 Oktober 2025 October 1 – 2, 2025	Jakarta
	Pembekalan Sertifikasi APU PPT & PPPSPM Jenjang 7 APU PPT & PPPSPM Level 7 Certification Training	FKDKP	29 Oktober 2025 October 29, 2025	Jakarta
	Pembekalan Sertifikasi Kepatuhan Jenjang 7 Compliance Level 7 Certification Training	FKDKP	6 November 2025 November 6, 2025	Jakarta
Ricko Irwanto	*Leadership Communication - BNC 35TH Anniversary*	Internal Bank	9 Januari 2025 January 9, 2025	Jakarta
	Leadership Communication - Balance Score Card Offsite Meeting	Internal Bank	31 Januari & 1 Februari 2025 January 31 & February 31, 2025	Jakarta
	Leadership Communication - Townhall HQ	Internal Bank	10 April 2025 April 10, 2025	Jakarta
	Refreshment Manajemen Risiko Jenjang 7 Risk Management Level 7 Refreshment	Maisa Edukasi	22 April 2025 April 22, 2025	Jakarta
	Leadership Communication: BNC Offsite Meeting 2H 2025	Internal Bank	7 & 8 Agustus 2025 August 7 & 8, 2025	Jakarta
	Leadership Communication: BNC Townhall	Internal Bank	20 Agustus 2025 August 20, 2025	Jakarta
	Pembekalan Sertifikasi Kepatuhan Jenjang 7 Compliance Level 7 Certification	FKDKP	30 September 2025 September 30, 2205	Jakarta

Nama Name	Program Pelatihan Training program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
	Mandatory Training: Cyber Security Awareness For BOD & BOC	Punggawa Cybersecurity	30 September 2025 September 30, 2025	Jakarta
	AI Training & Workshop	PT Kinarya Media Digital (Digital Bank)	1 - 2 Oktober 2025 October 1 – 2, 2025	Jakarta
	Pembekalan Sertifikasi APU PPT & PPPSPM Jenjang 7 APU PPT & PPPSPM Level 7 Certification Training	FKDKP	29 Oktober 2025 October 29, 2025	Jakarta
	Ujian Sertifikasi Kepatuhan Jenjang 7 Compliance Level 7 Certification	LSP LSPP	13 November 2025 November 13, 2025	Jakarta
	Ujian Sertifikasi APU PPT & PPPSPM Jenjang 7 APU PPT & PPPSPM Level 7 Certification	LSP LSPP	27 November 2025 November 27, 2025	Jakarta

Sekretaris Perusahaan

Sepanjang tahun 2025, Sekretaris Perusahaan mengikuti berbagai pelatihan dan program peningkatan kompetensi guna mendukung pelaksanaan tugas dan tanggung jawabnya secara optimal. Program tersebut dirancang untuk memastikan fungsi Sekretaris Perusahaan berjalan efektif dan selaras dengan ketentuan peraturan yang berlaku.

Rincian pelatihan yang diikuti Sekretaris Perusahaan selama tahun 2025 adalah sebagai berikut:

Corporate Secretary

Throughout 2025, the Corporate Secretary participated in various training sessions and competency development programs to optimize the performance of his duties and responsibilities. These programs were designed to ensure that the Corporate Secretary's functions are carried out effectively and in accordance with applicable regulations.

The details of the training attended by the Corporate Secretary during 2025 are as follows:

No	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
1	Pendalaman POJK No 29 Tahun 2016 tentang Laporan Tahunan Emiten atau Perusahaan Publik Pendalaman POJK 51 Tahun 2017 tentang Penerapan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik In-Depth Analysis of POJK No. 29 of 2016 on Annual Reports of Issuers or Public Companies In-Depth Analysis of POJK No. 51 of 2017 on the Implementation of Sustainability in Financial Services Institutions, Issuers, and Public Companies	ICSA	22 Januari 2025 January 22, 2025	Jakarta
2	Sosialisasi ESG Reporting ESG Reporting Socialization	Bursa Efek Indonesia Indonesia Stock Exchange	22 Januari 2025 January 23, 2025	Jakarta
3	Refreshment POJK terkait Aksi Korporasi: • POJK 15 Tahun 2022 tentang Pemecahan Saham Dan Penggabungan Saham Oleh Perusahaan Terbuka • POJK 29 Tahun 2023 tentang Pembelian Kembali Saham Yang Dikeluarkan Oleh Perusahaan Terbuka Refreshment of POJK Related to Corporate Actions: • POJK No. 15 of 2022 on Stock Splits and Stock Consolidations by Public Companies; • POJK No. 29 of 2023 on Share Buybacks by Public Companies	AEI	23 Januari 2025 January 23, 2025	Jakarta

No	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
4	*Leadership Communication - Balance Score Card Offsite Meeting*	Internal Bank	31 Januari & 1 Februari 2025 January 31 & February 1, 2025	Jakarta
5	Sosialisasi POJK Nomor 45 Tahun 2024 tentang Pengembangan dan Penguatan Emiten dan Perusahaan Publik Socialization of POJK No. 45 of 2024 on the Development and Strengthening of Issuers and Public Companies	OJK	6 Februari 2025 February 6, 2025	Jakarta
6	Pendalaman POJK Nomor 4/POJK.02/2022 tentang Penyampaian Laporan Keuangan Berkala Emiten atau Perusahaan Publik In-Depth Analysis of POJK No. 4/POJK.02/2022 on the Submission of Periodic Financial Reports by Issuers or Public Companies	ICSA	18 Februari 2025 February 18, 2025	Jakarta
7	ESG Disclosure: Peran Corporate Secretary dalam Penyampaian ESG Metrics melalui SPE-IDXnet ESG Disclosure: Peran Corporate Secretary dalam Penyampaian ESG Metrics melalui SPE-IDXnet	ICSA	24 Februari 2025 February 24, 2025	Jakarta
8	*Corporate Reputation in the Digital Era: Strategies to Build Investor Trust*	ICSA	26 Februari 2025 February 26, 2025	Jakarta
9	Menavigasi Tantangan ESG melalui Penguatan Kebijakan Good Corporate Governance Navigating ESG Challenges through Stronger Good Corporate Governance Policies	ICSA	18 Maret 2025 March 18, 2025	Jakarta
10	Webinar: Siapa Dibalik Korporasi? Mencermati Transparansi Beneficial Ownership dan Pengaturannya di Indonesia Webinar: Who's Behind the Corporation? Examining Beneficial Ownership Transparency and Its Regulation in Indonesia	AEI	19 Maret 2025 March 19, 2025	Jakarta
11	Pendalaman POJK Nomor 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan Pendalaman SE OJK Nomor 18 Tahun 2023 tentang Tata Cara Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan In-Depth Analysis of OJK Regulation No. 9 of 2023 on the Use of Public Accountants and Public Accounting Firms in Financial Services Activities In-Depth Analysis of OJK Circular Letter No. 18 of 2023 on Procedures on the Use of Public Accountants and Public Accounting Firms in Financial Services Activities	ICSA	19 Maret 2025 March 19, 2025	Jakarta
12	Refreshment Manajemen Risiko Jenjang 6 Risk Management Level 6 Refreshment	Maisa Edukasi	22 April 2025 April 22, 2025	Jakarta
13	*Awareness Training Of ISO/IEC 27001: 2022 & SOA, Risk Management Workshop*	Premysis Consulting	22-23 April 2025 April 22-23, 2025	Jakarta
14	*Training Mandatory: Business Continuity Plan (BCP) - Batch 9*	Internal Bank	12 Juni 2025 June 12, 2025	Jakarta
15	*Training Mandatory: Cyber Security Awareness - Batch 3*	Internal Bank	22 Juli 2025 July 22, 2025	Jakarta

No	**Program Pelatihan** Training Program	**Penyelenggara** Organizer	**Tanggal** Date	**Lokasi** Location
16	Pendalaman Peraturan Otoritas Jasa Keuangan Nomor 4 Tahun 2024 tentang Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka dan Laporan Aktivitas Menjaminkan Saham Perusahaan Terbuka In-Depth Analysis of Financial Services Authority Regulation No. 4 of 2024 on Reports of Share Ownership or Any Changes in Share Ownership of Public Companies and Reports on Activities Involving the Pledging of Shares of Public Companies	ICSA	29 Juli 2025 July 29, 2025	Jakarta
17	BNC Offsite Meeting 2H 2025	Internal Bank	7-8 Agustus 2025 August 7-8, 2025	Jakarta
18	Mandatory Training: APU PPT Batch 11	Internal Bank	26 Agustus 2025 August 26, 2025	Jakarta
19	*Sosialisasi Linkedin Learning 2025* *LinkedIn Learning 2025 Socialization*	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
20	*AI Training & Workshop*	PT Kinarya Media Digital (Digital Bank)	1-2 Oktober 2025 October 1-2, 2025	Jakarta
21	*Mandatory Training: Business Continuity Plan (BCP) Batch 12*	Internal Bank	16 Oktober 2025 October 16, 2025	Jakarta
22	Mandatory Training: Fraud Awareness Batch Susulan Mandatory Training: Fraud Awareness - Follow-up Session	Internal Bank	1-2 Desember 2025 December 1-2, 2025	Jakarta
23	Mandatory Training: Penerapan Risk Manajemen - Batch 10 Mandatory Training: Implementation of Risk Management - Batch 10	Internal Bank	19 Desember 2025 December 19, 2025	Jakarta

Satuan Kerja Audit Intern (SKAI)

Sebagai bagian dari upaya peningkatan kualitas audit internal, Perseroan secara berkelanjutan mendorong pengembangan kompetensi auditor melalui berbagai pelatihan dan seminar. Program tersebut mencakup pelatihan internal dan eksternal, serta kegiatan berbagi pengetahuan terkait praktik audit internal yang relevan.

Internal Audit Unit (SKAI)

As part of its efforts to improve the quality of internal audits, the Company continuously encourages the development of auditors' competencies through various training sessions and seminars. These programs include internal and external training, as well as knowledge-sharing activities related to relevant internal audit practices.

Rincian pendidikan, pelatihan, dan/atau seminar yang diikuti oleh SKAI sepanjang tahun 2025 disajikan pada:

Details of the education, training, and/or seminars attended by the SKAI throughout 2025 are as follows:

No	Keterangan Remarks	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
1	Head of Satuan Kerja Audit Intern Head of Internal Audit Unit	Leadership Communication - Balance Score Card Offsite Meeting	Internal Bank	31 Januari & 1 Februari 2025 January 31 & February 1, 2025	Jakarta
		Socialization - Isms Awareness Based on ISO/IEC 27001:2022	Premysis Consulting	28 April 2025 April 28, 2025	Jakarta
		Refreshment Manajemen Risiko Jenjang 6 Risk Management Level 6 Refreshment	Maisa Edukasi	2 Mei 2025 May 2, 2025	Jakarta
		Internal Audit Training For ISOEIC 27001:2022 Implementation Based on ISO 19011:2018	Premysis Consulting	7 Mei 2025 May 7, 2025	Jakarta
		Training Mandatory: Business Continuity Plan (BCP) - Batch 7	Internal Bank	11 Juni 2025 June 11, 2025	Jakarta
		Sosialisasi Launching SIRISK SIRISK Launching Socialization	Internal Bank	2 Juli 2025 July 2, 2025	Jakarta
		Training Mandatory: Cyber Security Awareness - Batch 3	Internal Bank	22 Juli 2025 July 22, 2025	Jakarta
		Pembekalan Sertifikasi Internal Audit Level Manager Internal Audit Manager Level Certification Training	Maisa Edukasi	19 Agustus 2025 August 19, 2025	Jakarta
		BNC Offsite Meeting 2H 2025	Internal Bank	7-8 Agustus 2025 August 7-8, 2025	Jakarta
		Mandatory Training: APU PPT Batch 10	Internal Bank	13 Agustus 2025 August 13, 2025	Jakarta
		Ujian Sertifikasi Internal Audit Level Manager Internal Audit Manager Level Certification	LSP LSPP	19 September 2025 September 19, 2025	Jakarta
		Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
		AI Training & Workshop	PT Kinarya Media Digital (Digital Bank)	1-2 Oktober 2025 October 1-2, 2025	Jakarta
		Workshop Implementasi Internal Control Over Financial Reporting (ICOFR) Workshop – Implementation of Internal Control Over Financial Reporting (ICOFR)	IIA Indonesia	15 Oktober 2025 October 15, 2025	Jakarta
		Mandatory Training: Anti Fraud Awareness - Batch 3	Internal Bank	5 November 2025 November 5, 2025	Jakarta
		Mandatory Training: Penerapan Risk Management - Batch 3 Mandatory Training: Risk Management Implementation – Batch 3	Internal Bank	21 November 2025 November 21, 2025	Jakarta
		Training Advanced Risk Auditing	IIA Indonesia	3-4 Desember 2025 December 3-4, 2025	Jakarta

No	Keterangan Remarks	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
2	Project & Methodology Audit Head	Pembekalan Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification Training	Efektif Pro	12-13 Februari 2025 February 12-13, 2025	Jakarta
		Training Refreshment Risk Control Self-Assesment (RCSA) - Control Testing	Internal Bank	12 Maret 2025 March 12, 2025	Jakarta
		Ujian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification	Lsp Lspp	25 Maret 2025 March 25, 2025	Jakarta
		Socialization - ISMS Awareness Based on ISO/IEC 27001:2022	Premysis Consulting	28 April 2025 April 28, 2025	Jakarta
		Internal Audit Training For Isoeic 27001:2022 Implementation Based on ISO 19011:2018	Premysis Consulting	7 Mei 2025 May 7, 2025	Jakarta
		Pembekalan Sertifikasi Internal Audit Level Supervisor Internal Audit Supervisor Level Certification Training	Maisa Edukasi	22 Mei 2025 May 22, 2025	Jakarta
		Training Mandatory: Business Continuity Plan (BCP) - Batch 2	Internal Bank	3 Juni 2025 June 3, 2025	Jakarta
		Ujian Sertifikasi Internal Audit Level Supervisor Internal Audit Supervisor Level Certification	LSP LSPP	12 Juni 2025 June 12, 2025	Jakarta
		Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) serta Teknis Penggunaan Tools SIRISK Socialization & Training Risk Assessment (RCSA, RLED, KRI) and Technical Guidance on the Use of SIRISK Tools	Internal Bank	7 Juli 2025 July 7, 2025	Jakarta
		Training Mandatory: Cyber Security Awareness - Batch 4	Internal Bank	22 Juli 2025 July 22, 2025	Jakarta
		Mandatory Training: APU PPT Batch 9	Internal Bank	13 Agustus 2025 August 13, 2025	Jakarta
		Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
		FGD Risk Management	Internal Bank	2 Oktober 2025 October 2, 2025	Jakarta
		Mandatory Training: Anti Fraud Awareness - Batch 7	Internal Bank	19 November 2025 November 19, 2025	Jakarta
		Mandatory Training: Penerapan Risk Management - Batch 3 Mandatory Training: Risk Management Implementation - Batch 3	Internal Bank	21 November 2025 November 21, 2025	Jakarta
		Sosialisasi Microsoft : Batch 2	Internal Bank	2 Desember 2025 December 2, 2025	Jakarta

No	Keterangan Remarks	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
3	General Audit Head	Sosialisasi Perusahaan: Sosialisasi Asuransi MSIG - Maret 2025 Corporate Socialization : Socialization of MSIG Insurance – March 2025	PT MSIG Life Insurance Indonesia Tbk	27 Maret 2025 March 27, 2025	Jakarta
		Internal Audit Training For ISOEIC 27001:2022 Implementation Based on ISO 19011:2018	Premysis Consulting	7 Mei 2025 May 7, 2025	Jakarta
		Pembekalan Sertifikasi Internal Audit Level Supervisor	Maisa Edukasi	22 Mei 2025 May 22, 2025	Jakarta
		Training Mandatory: Business Continuity Plan (BCP) - Batch 5	Internal Bank	5 Juni 2025 June 5, 2025	Jakarta
		Ujian Sertifikasi Internal Audit Level Supervisor Internal Audit Supervisor Level Certification	LSP LSPP	12 Juni 2025 June 12, 2025	Jakarta
		Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) Serta Teknis Penggunaan Tools SIRISK Socialization & Training Risk Assessment (RCSA, RLED, KRI) and Technical Guidance on the Use of SIRISK Tools	Internal Bank	7 Juli 2025 July 7, 2025	Jakarta
		Refreshment Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification (Refreshment)	Maisa Edukasi	21 - 22 Juli 2025 July 21 – 22, 2025	Jakarta
		Training Penerapan Program APU, PPT, dan PPPSPM Training on Implementation of APU, PPT, and PPPSPM Programs	Pusat Edukasi Indonesia	7 - 8 Agustus 2025 August 7 – 8, 2025	Jakarta
		Mandatory Training: APU PPT Batch 10	Internal Bank	13 Agustus 2025 August 13, 2025	Jakarta
		Training Mandatory: Cyber Security Awareness - Batch 7	Punggawa Cybersecurity	18 September 2025 September 18, 2025	Jakarta
		Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
		FGD Risk Management	Internal Bank	2 Oktober 2025 October 2, 2025	Jakarta
		Sosialisasi Coretax DJP DJP Coretax Socialization	DJP	5 November 2025 November 5, 2025	Jakarta
		Mandatory Training: Anti Fraud Awareness - Batch 3	Internal Bank	5 November 2025 November 5, 2025	Jakarta
		Mandatory Training: Penerapan Risk Management - Batch 2 Mandatory Training: Risk Management Implementation- Batch 2	Internal Bank	20 November 2025 November 20, 2025	Jakarta
		Sosialisasi Microsoft: Batch 4 Microsoft Socialization: Batch 4	Internal Bank	3 Desember 2025 December 3, 2025	Jakarta

No	Keterangan Remarks	Program Pelatihan Training Program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
4	IT Audit Head	Ujian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification	LSP LSPP	25 Maret 2025 March 25, 2025	Jakarta
		Awareness Training of ISO/IEC 27001: 2022 & SOA, Risk Management Workshop	Premysis Consulting	22 & 23 April 2025 April 22 & 23, 2025	Jakarta
		Socialization – ISMS Awareness Based on ISO/IEC 27001:2022	Premysis Consulting	28 April 2025 April 28, 2025	Jakarta
		Internal Audit Training for ISOEIC 27001:2022 Implementation Based On ISO 19011:2018	Premysis Consulting	7 Mei 2025 May 7, 2025	Jakarta
		Pembekalan Sertifikasi Internal Audit Level Supervisor Internal Audit Supervisor Level Certification Training	Maisa Edukasi	22 Mei 2025 May 22, 2025	Jakarta
		Training Mandatory: Business Continuity Plan (BCP) - Batch 8	Internal Bank	11 Juni 2025 June 11, 2025	Jakarta
		Ujian Sertifikasi Internal Audit Level Supervisor Internal Audit Supervisor Level Certification	LSP LSPP	12 Juni 2025 June 12, 2025	Jakarta
		Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) Serta Teknis Penggunaan Tools SIRISK Socialization & Training Risk Assessment (RCSA, RLED, KRI) and Technical Guidance on the use of SIRISK Tools	Internal Bank	7 Juli 2025 July 7, 2025	Jakarta
		Training Mandatory: Cyber Security Awareness - Batch 3	Internal Bank	22 Juli 2025 July 22, 2025	Jakarta
		Mandatory Training: APU PPT Batch 17	Internal Bank	26 September 2025 September 26, 2025	Jakarta
		Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
		FGD Risk Management	Internal Bank	2 Oktober 2025 October 2, 2025	Jakarta
		Sosialisasi Coretax DJP DJP Coretax Socialization	DJP	5 November 2025 November 5, 2025	Jakarta
		Mandatory Training: Anti Fraud Awareness - Batch 2	Internal Bank	4 November 2025 November 4, 2025	Jakarta
		Mandatory Training: Penerapan Risk Management - Batch 1 Mandatory Training: Risk Management Implementation - Batch 1	Internal Bank	20 November 2025 November 20, 2025	Jakarta
		Ujian Certified Information Systems Auditor (CISA) Certified Information Systems Auditor (CISA) Test	Itg Indonesia	28 November 2025 November 28, 2025	Jakarta
		Sosialisasi Microsoft : Batch 1	Internal Bank	2 Desember 2025 December 2, 2025	Jakarta

Satuan Kerja Manajemen Risiko (SKMR) / Risk Management Unit (SKMR)

Perseroan secara konsisten meningkatkan kompetensi sumber daya manusia pada Satuan Kerja Manajemen Risiko melalui berbagai program pelatihan internal dan eksternal guna memperkuat penerapan manajemen risiko yang efektif dan berkelanjutan.

The Company consistently enhances the competencies of its human resources within the Risk Management Unit through various internal and external training programs to strengthen the implementation of effective and sustainable risk management.

Rincian pendidikan, pelatihan, dan/atau seminar yang diikuti oleh Satuan Kerja Manajemen Risiko sepanjang tahun 2025 adalah sebagai berikut:

Details of the education, training, and/or seminars attended by the Risk Management Unit throughout 2025 are as follows:

Keterangan Remarks	**Program Pelatihan** Training program	**Penyelenggara** Organizer	**Tanggal** Date	**Lokasi** Location
Head of Risk Management	Pembekalan Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Level 6 Certification Training	Efektif Pro	22 Januari 2025 January 22, 2025	Jakarta
	Leadership Communication - Balance Score Card Offsite Meeting	Internal Bank	31 Januari & 1 Februari 2025 January 31 & February 1, 2025	Jakarta
	Ujian Sertifikasi Manajemen Risiko Jenjang 6 Risk Management Level 6 Certification	LSP LSPP	5 Februari 2025 February 5, 2025	Jakarta
	Training Climate Risk Management And Scenario Analysis (CRMS) dan *Climate Risk Stress Testing* (CRST)	Learning Media Indonesia (LMI)	13-14 Maret 2025 March 13-14, 2025	Jakarta
	Awareness Training of ISO/IEC 27001: 2022 & SOA, Risk Management Workshop	Premysis Consulting	22 & 23 April 2025 April 22 & 23, 2025	Jakarta
	Training Mandatory: Business Continuity Plan (BCP) - Batch 5	Internal Bank	5 Juni 2025 June 5, 2025	Jakarta
	BNC Offsite Meeting 2H 2025	Internal Bank	7 & 8 Agustus 2025 August 7 & 8, 2025	Jakarta
	Mandatory Training: APU PPT Batch 13	Internal Bank	22 Agustus 2025 August 22, 2025	Jakarta
	Training Mandatory: Cyber Security Awareness - Batch 10	Punggawa Cybersecurity	19 September 2025 September 19, 2025	Jakarta
	FGD Risk Management	Internal Bank	19 September 2025 September 19, 2025	Jakarta
	Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
	AI Training & Workshop	PT Kinarya Media Digital (Digital Bank)	1 - 2 Oktober 2025 October 1 – 2, 2025	Jakarta
	Sosialisasi Neo Smart Neo Smart Socialization	Internal Bank	15 Oktober 2025 October 15, 2025	Jakarta
	Training Cyber Risk Management	Multimatics	22 - 23 Oktober 2025 October 22 – 23, 2025	Jakarta
	Sosialisasi Coretax DJP DJP Coretax Socialization	DJP	5 November 2025 November 5, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 5	Internal Bank	6 November 2025 November 6, 2025	Jakarta

Keterangan Remarks	**Program Pelatihan** Training program	**Penyelenggara** Organizer	**Tanggal** Date	**Lokasi** Location
	Mandatory Training: Penerapan *Risk Management - Batch* 7 Mandatory Training: Risk Management Implementation - Batch 7	Internal Bank	28 November 2025 November 28, 2025	Jakarta
Enterprise Risk Management Head	*Training Climate Risk Management And Scenario Analysis* (CRMS) dan *Climate Risk Stress Testing* (CRST)	Learning Media Indonesia (LMI)	13-14 Maret 2025 March 13-14, 2025	Jakarta
	Socialization - ISMS Awareness Based on ISO/IEC 27001:2022	Premysis Consulting	28 April 2025 April 28, 2025	Jakarta
	Training Mandatory: Business Continuity Plan (BCP) - Batch 10	Internal Bank	12 Juni 2025 June 12, 2025	Jakarta
	Refreshment Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 6 Certification (Refreshment)	Maisa Edukasi	19 Juni 2026 June 19, 2025	Jakarta
	Mandatory Training: APU PPT Batch 7	Internal Bank	12 Agustus 2025 August 12, 2025	Jakarta
	Training Mandatory: Cyber Security Awareness - Batch 10	Punggawa Cybersecurity	19 September 2025 September 19, 2025	Jakarta
	FGD Risk Management	Internal Bank	19 September 2025 September 19, 2025	Jakarta
	Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
	Sosialisasi Neo Smart Neo Smart Socialization	Internal Bank	16 Oktober 2025 October 16, 2025	Jakarta
	Training Cyber Risk Management	Multimatics	22 - 23 Oktober 2025 October 22 – 23, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 2	Internal Bank	4 November 2025 November 4, 2025	Jakarta
	Mandatory Training: Penerapan *Risk* Manajemen - Batch 9 Mandatory Training: Risk Management Implementation - Batch 9	Internal Bank	16 Desember 2025 December 16, 2025	Jakarta
Operational Risk Management Head	*Induction Training*	Internal Bank	5-6 Maret 2025 March 5-6, 2025	Jakarta
	Awareness Training of ISO/IEC 27001: 2022 & SOA, Risk Management Workshop	Premysis Consulting	22-23 April 2025 April 22-23, 2025	Jakarta
	Pengkinian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification Training	Maisa Edukasi	29-30 April 2025 April 29-30, 2025	Jakarta
	Mandatory Training: APU PPT Batch 13	Internal Bank	22 Agustus 2025 August 22, 2025	Jakarta
	FGD Risk Management	Internal Bank	6, 7, 8, 11, 12, 13, 20, 21, 22, 25, 26 Agustus 2025 August 6, 7, 8, 11, 12, 13, 20, 21, 122, 25, 26, 2025	Jakarta
	Training Mandatory: Cyber Security Awareness - Batch 6	Punggawa Cybersecurity	17 September 2025 September 17, 2025	Jakarta

Keterangan Remarks	Program Pelatihan Training program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
	Ujian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification	LSP LSPP	30 September 2025 September 30, 2025	Jakarta
	FGD Risk Management	Internal Bank	3, 4, 8, 9, 10, 11, 12, 15, 16, 18, 19, September 2025 September 3, 4, 8, 9, 10, 11, 12, 15, 16, 18, 19, 2025	Jakarta
	Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 Setpember 9, 2025	Jakarta
	FGD Risk Management	Internal Bank	2 Oktober 2025 October 2, 2025	Jakarta
	Sosialisasi Neo Smart Neo Smart Socialization	Internal Bank	15 Oktober 2025 October 15, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 3	Internal Bank	5 November 2025 November 5, 2025	Jakarta
	Mandatory Training: Penerapan Risk Management - Batch 3 Mandatory Training: Risk Management Implementation - Batch 3	Internal Bank	21 November 2025 November 21, 2025	Jakarta
Credit Risk Policy Head	Pengkinian Sertifikasi Manajemen Risiko Jenjang 5 Update on Risk Management Level 5 Certification	Efektif Pro	23 Januari 2025 January 23, 20225	Jakarta
	Ujian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification	LSP LSPP	5 Februari 2025 February 5, 2025	Jakarta
	Training Climate Risk Management And Scenario Analysis (CRMS) Dan Climate Risk Stress Testing (CRST) Training Climate Risk Management And Scenario Analysis (CRMS) and Climate Risk Stress Testing (CRST)	Learning Media Indonesia (Lmi)	13 & 14 Maret 2025 March 13 & 14, 2025	Jakarta
	Training Mandatory: Business Continuity Plan (BCP) - Batch 10	Internal Bank	12 Juni 2025 June 12, 2025	Jakarta
	Sosialisasi & Training Risk Assessment (Rcsa, Rled, Kri) Serta Teknis Penggunaan Tools Sirisk Socialization & Training Risk Assessment (Rcsa, Rled, Kri) and Technical Guidance on the use of Sirisk Tools	Internal Bank	28 Juli 2025 July 28, 2025	Jakarta
	Mandatory Training: APU PPT Batch 13	Internal Bank	22 Agustus 2025 August 22, 2025	Jakarta
	Pembekalan Sertifikasi Kepatuhan Jenjang 5 Compliance Level 5 Certification Training	Maisa Edukasi	17 September 2025 September 17, 2025	Jakarta

Keterangan Remarks	**Program Pelatihan** Training program	**Penyelenggara** Organizer	**Tanggal** Date	**Lokasi** Location
	Training Mandatory: Cyber Security Awareness - Batch 7	Punggawa Cybersecurity	18 September 2025 September 18, 2025	Jakarta
	FGD Risk Management	Internal Bank	19 September 2025 September 19, 2025	Jakarta
	Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
	Sosialisasi Neo Smart Neo Smart Socialization	Internal Bank	15 Oktober 2025 October 15, 2025	Jakarta
	Training Cyber Risk Management	Multimatics	22 - 23 Oktober 2025 October 22 – 23, 2025	Jakarta
	Ujian Sertifikasi Kepatuhan Jenjang 5 Compliance Level 5 Certification	LSP LSPP	30 Oktober 2025 October 30, 2025	Jakarta
	Sosialisasi Coretax DJP DJP Coretax Socialization	DJP	5 November 2025 November 5, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 3	Internal Bank	5 November 2025 November 5, 2025	Jakarta
	Mandatory Training: Penerapan Risk Management - Batch 2 Mandatory Training: Risk Management Implementation - Batch 2	Internal Bank	20 November 2025 November 20, 2025	Jakarta
	Sosialisasi Microsoft : Batch 1 Microsoft Socialization: Batch 1	Internal Bank	2 Desember 2025 December 2, 2025	Jakarta
Portfolio Management Head	Training Climate Risk Management And Scenario Analysis (CRMS) Dan Climate Risk Stress Testing (CRST) Training Climate Risk Management And Scenario Analysis (CRMS) and Climate Risk Stress Testing (CRST)	Learning Media Indonesia (LMI)	13 & 14 Maret 2025 March 13 & 14, 2025	Jakarta
	Pembekalan Sertifikasi Manajemen Risiko Jenjang 4 Risk Management Level 4 Certification Training	Efektif Pro	29 & 30 April 2025 April 29 & 30, 2025	Jakarta
	Training Mandatory: Business Continuity Plan (BCP) - Batch 10	Internal Bank	12 Juni 2025 June 12, 2025	Jakarta
	Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) Serta Teknis Penggunaan Tools Sirisk Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) and Technical Guidance on the Use of Sirisk Tools	Internal Bank	24 Juli 2025 June 24, 2025	Jakarta
	Mandatory Training: APU PPT Batch 10	Internal Bank	13 Agustus 2025 August 13, 2025	Jakarta
	Training Mandatory: Cyber Security Awareness - Batch 7	Punggawa Cybersecurity	18 September 2025 September 18, 2025	Jakarta
	Pembekalan Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification Training	Efektif Pro	29 September 2025 September 29, 2025	Jakarta

Keterangan Remarks	Program Pelatihan Training program	Penyelenggara Organizer	Tanggal Date	Lokasi Location
	FGD *Risk Management*	Internal Bank	19 September 2025 September 19, 2025	Jakarta
	Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
	Ujian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification	LSP LSPP	14 Oktober 2025 October 14, 2025	Jakarta
	Sosialisasi Neo Smart Neo Smart Socialization	Internal Bank	15 Oktober 2025 October 15, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 3	Internal Bank	5 November 2025 November 5, 2025	Jakarta
	Mandatory Training: Penerapan Risk Management - Batch 2 Mandatory Training: Risk Management Implementation - Batch 2	Internal Bank	20 November 2025 November 20, 2025	Jakarta
	Sosialisasi Microsoft: Batch 2	Internal Bank	2 Desember 2025 December 2, 2025	Jakarta
IT Risk Management Head	*Training Climate Risk Management And Scenario Analysis* (CRMS) Dan *Climate Risk Stress Testing* (CRST)	Learning Media Indonesia (LMI)	13 &14 Maret 2025 March 13 & 14, 2025	Jakarta
	Sosialisasi Perusahaan: Sosialisasi Asuransi MSIG - Maret 2025 Corporate Socialization - MSIG Insurance – March 2025	PT MSIG Life Insurance Indonesia Tbk	27 Maret 2025 March 27, 2025	Jakarta
	Awareness Training of ISO/IEC 27001: 2022 & SOA, Risk Management Workshop	Premysis Consulting	22 & 23 April 2025 April 22 & 23, 2025	Jakarta
	Socialization - ISMS Awareness Based on ISO/IEC 27001:2022	Premysis Consulting	28 April 2025 April 28, 2025	Jakarta
	Pengkinian Sertifikasi Manajemen Risiko Jenjang 5 Update on Risk Management Level 5 Certification	Maisa Edukasi	29 & 30 April 2025 April 29 & 30, 2025	Jakarta
	Training Mandatory: Business Continuity Plan (BCP) - Batch 10	Internal Bank	12 Juni 2025 June 12, 2025	Jakarta
	Pemantapan Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification Training	Maisa Edukasi	19 Juni 2026 June 19, 2026	Jakarta
	Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) serta Teknis Penggunaan Tools SIRISK Sosialisasi & Training Risk Assessment (RCSA, RLED, KRI) and Technical Guidance on the Use of SIRISK Tools	Internal Bank	7 Juli 2025 July 7, 2025	Jakarta
	Ujian Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Certification	LSP LSPP	10 Juli 2025 July 10, 2025	Jakarta
	FGD Risk Management	Internal Bank	Agustus 2025 August 2025	Jakarta

Keterangan Remarks	**Program Pelatihan** Training program	**Penyelenggara** Organizer	**Tanggal** Date	**Lokasi** Location
	Training Mandatory: Cyber Security Awareness - Batch 10	Punggawa Cybersecurity	19 September 2025 September 19, 2025	Jakarta
	Mandatory Training: APU PPT Batch 15	Internal Bank	22 September 2025 September 22, 2025	Jakarta
	Sosialisasi Linkedin Learning 2025 Linkedin Learning 2025 Socialization	Linkedin Singapore	9 September 2025 September 9, 2025	Jakarta
	FGD Risk Management	Internal Bank	3 Oktober 2025 October 3, 2025	Jakarta
	Sosialisasi Neo Smart Neo Smart Socialization	Internal Bank	16 Oktober 2025 October 16, 2025	Jakarta
	Training Cyber Risk Management	Multimatics	22 - 23 Oktober 2025 October 22 – 23, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 5	Internal Bank	6 November 2025 November 6, 2025	Jakarta
	Mandatory Training: Penerapan Risk Management - Batch 4 Mandatory Training: Risk Management Implementation - Batch 4	Internal Bank	21 November 2025 November 21, 2025	Jakarta
	Sosialisasi Microsoft: Batch 5 Microsoft Socialization: Batch 5	Internal Bank	4 Desember 2025 December 4, 2025	Jakarta
Market Liquidity Risk Head	*Leadership Communication - BNC 35th Anniversary*	Internal Bank	9 Januari 2025 January 9, 2025	Jakarta
	Training Climate Risk Management And Scenario Analysis (CRMS) Dan *Climate Risk Stress Testing (CRST)*	Learning Media Indonesia (LMI)	13 & 14 Maret 2025 March 13 &14, 2025	Jakarta
	Sosialisasi Perusahaan: Sosialisasi Asuransi MSIG - Maret 2025 Corporate Socialization - MSIG Insurance – March 2025	PT MSIG Life Insurance Indonesia Tbk	27 Maret 2025 March 27, 2025	Jakarta
	Leadership Communication -Townhall HQ	Internal Bank	10 April 2025 April 10, 2025	Jakarta
	Refreshment Sertifikasi Manajemen Risiko Jenjang 5 Risk Management Level 5 Refreshment	Internal Bank	30 April 2025 April 30, 2025	Jakarta
	Training Mandatory: Business Continuity Plan (BCP) - Batch 8	Internal Bank	11 Juni 2025 June 11, 2025	Jakarta
	Leadership Communication: BNC Townhall	Internal Bank	20 Agustus 2025 August 20,2025	Jakarta
	FGD Risk Management	Internal Bank	25 Agustus 2025 August 25,2025	Jakarta
	Training Mandatory: Cyber Security Awareness - Batch 10	Punggawa Cybersecurity	19 September 2025 September 19, 2025	Jakarta
	Mandatory Training: APU PPT Batch 15	Internal Bank	22 September 2025 September 22, 2025	Jakarta
	Sosialisasi Coretax DJP DJP Coretax Socialization	Direktorat Jendral Pajak	5 November 2025 November 5, 2025	Jakarta
	Mandatory Training: Anti Fraud Awareness - Batch 5	Internal Bank	6 November 2025 November 6, 2025	Jakarta
	Mandatory Training: Penerapan Risk Management - Batch 5 Mandatory Training: Implementation of Risk Management - Batch 5	Internal Bank	24 November 2025 November 24, 2025	Jakarta

Promosi dan Mutasi

Promosi dan mutasi merupakan bagian penting dari strategi pengelolaan SDM Perseroan. Melalui kebijakan ini, karyawan memperoleh kesempatan untuk mengembangkan potensi melalui penugasan baru, tantangan yang lebih besar, serta peningkatan tanggung jawab. Kebijakan tersebut juga memastikan ketersediaan talenta yang sesuai dengan kebutuhan organisasi.

Perseroan menerapkan kebijakan alih tugas yang mencakup promosi, mutasi, dan detasering dengan tujuan:

1. Memberikan ruang pengembangan diri bagi karyawan agar memiliki pengetahuan, keterampilan, kompetensi, dan pengalaman yang mendukung jalur karier.
2. Menjadi sarana evaluasi kompetensi dalam rangka menyiapkan suksesi kepemimpinan.
3. Mengurangi risiko penurunan produktivitas akibat kejenuhan kerja.
4. Memenuhi kebutuhan organisasi dalam membina dan mengembangkan SDM secara berkelanjutan.

Pada tahun 2025, Perseroan mencatat sebanyak 39 karyawan menerima promosi dan 370 karyawan menjalani mutasi. Sebagai perbandingan, pada tahun 2024 terdapat 51 promosi dan 655 mutasi, sedangkan pada tahun 2023 tercatat 69 promosi dan 292 mutasi. Penyesuaian ini menunjukkan fleksibilitas kebijakan Perseroan dalam mendukung kebutuhan bisnis.

Rincian promosi dan mutasi karyawan selama tiga tahun terakhir disajikan pada:

Promotions and Mutations

Promotions and mutations are an important part of the Company's human resources management strategy. Through this policy, employees are given the opportunity to develop their potential through new assignments, greater challenges, and increased responsibilities. This policy also ensures the availability of talent that aligns with the organization's needs.

The Company implements a job reassignment policy that includes promotions, mutations, and secondments with the following objectives:

1. To provide employees with opportunities for self-development so they acquire the knowledge, skills, competencies, and experience that support their career paths.
2. To serve as a means of evaluating competencies in preparation for leadership succession.
3. To reduce the risk of decreased productivity due to job burnout.
4. To meet the organization's needs in fostering and developing human resources sustainably.

In 2025, the Company recorded 39 employees receiving promotions and 370 employees undergoing transfers. By comparison, in 2024 there were 51 promotions and 655 transfers, while in 2023 there were 69 promotions and 292 transfers. These adjustments demonstrate the flexibility of the Company's policies in supporting business needs.

Details of employee promotions and Mutations over the past three years are presented in:

Uraian *Description*	**2025**	**2024**	**2023**
Promosi *Employee Promotion*	39	51	69
Mutasi *Employee Transfers*	370	655	292

Melalui penerapan kebijakan promosi dan mutasi yang terencana, Perseroan membangun organisasi yang adaptif, tangguh, dan siap mendukung keberlanjutan usaha.

Through the implementation of well-planned promotion and transfer policies, the Company builds an adaptive, resilient organization that is ready to support business sustainability.

Fasilitas Kesehatan

Perseroan berkomitmen menjaga kesejahteraan karyawan melalui penyediaan fasilitas kesehatan yang memadai. Fasilitas tersebut mencakup pembiayaan pengobatan, tindakan medis, serta layanan kesehatan lainnya yang relevan dengan kebutuhan karyawan. Upaya ini dilakukan untuk menciptakan lingkungan kerja yang sehat dan produktif.

Selain itu, seluruh karyawan Perseroan telah terdaftar sebagai peserta BPJS Ketenagakerjaan, yang meliputi jaminan kecelakaan kerja, jaminan hari tua, dan jaminan pensiun. Program ini memberikan perlindungan sosial yang berkelanjutan serta meningkatkan rasa aman karyawan dalam menjalankan perannya.

Melalui penyediaan fasilitas kesehatan tersebut, Perseroan menunjukkan kepedulian terhadap kualitas hidup karyawan sekaligus menjaga keseimbangan antara kesejahteraan SDM dan keberlanjutan operasional.

Rencana Pengembangan SDM Tahun 2026

BNC berkomitmen untuk terus mengembangkan sumber daya manusia secara berkelanjutan guna mendukung pencapaian rencana bisnis dan target strategis Perseroan. Pengembangan SDM dirancang dengan mempertimbangkan dinamika eksternal, khususnya perkembangan industri perbankan, serta tetap mengacu pada kebijakan pemerintah yang berlaku.

Memasuki tahun 2026, Perseroan telah menetapkan sejumlah rencana pengembangan SDM yang disesuaikan dengan kondisi terkini, antara lain:

1. Pemenuhan perencanaan kebutuhan tenaga kerja (*manpower planning*) dari sumber internal maupun eksternal sesuai rencana bisnis Bank.
2. Pengembangan karyawan melalui program pelatihan, pendidikan, serta *individual development plan* yang selaras dengan arah strategis Perseroan.
3. Pemenuhan pengembangan kompetensi wajib sesuai ketentuan dan regulasi yang berlaku.

Dengan implementasi rencana tersebut, BNC optimistis dapat membangun SDM yang adaptif, inovatif, dan siap mendukung transformasi digital serta keberlanjutan industri perbankan nasional.

Healthcare Facilities

The Company is committed to safeguarding employee well-being by providing adequate healthcare facilities. These facilities include coverage for medical treatment, medical procedures, and other healthcare services relevant to employees' needs. These efforts aim to create a healthy and productive work environment.

Additionally, all Company employees are enrolled in the BPJS Ketenagakerjaan program, which includes coverage for workplace accidents, old-age benefits, and pension benefits. This program provides sustainable social protection and enhances employees' sense of security in performing their roles.

Through the provision of these healthcare facilities, the Company demonstrates its commitment to employees' quality of life while maintaining a balance between human resource well-being and operational sustainability.

2026 Human Resources Development Plan

BNC is committed to continuously developing human resources in a sustainable manner to support the achievement of the Company's business plans and strategic targets. Human resources development is designed by taking into account external dynamics, particularly developments in the banking industry, while remaining aligned with applicable government policies.

Going into 2026, the Company has established a number of HR development plans tailored to current conditions, including:

1. Fulfillment of manpower planning from both internal and external sources according to the Bank's business plan.
2. Development of employees through training programs, education, and individual development plans aligned with the Company's strategic direction.
3. Fulfillment of mandatory competency development requirements as stipulated in applicable regulations.

With the implementation of these plans, BNC is optimistic in its ability to build a workforce that is adaptive, innovative, and ready to support digital transformation and the sustainability of the national banking industry.

Teknologi Informasi
Information Technology



PT Bank Neo Commerce Tbk ("BNC") merupakan bank berbasis digital di Indonesia yang berkomitmen menghadirkan layanan perbankan yang modern, mudah diakses, dan aman bagi nasabah. Pemanfaatan Teknologi Informasi ("TI") menjadi fondasi utama Perseroan dalam menjawab dinamika kebutuhan nasabah yang terus berkembang seiring percepatan transformasi digital.

Penguatan kapabilitas TI ditempatkan sebagai prioritas strategis guna memastikan keberlangsungan operasional yang andal sekaligus meningkatkan daya saing Perseroan di tengah industri perbankan yang semakin kompetitif. BNC meyakini bahwa pengembangan TI perlu dilakukan secara bertahap, terencana, dan menyeluruh agar mampu mendukung pertumbuhan bisnis, merespons perubahan pasar, serta beradaptasi dengan kemajuan teknologi yang cepat dan dinamis.

PT Bank Neo Commerce Tbk ("BNC") is a digital-based bank in Indonesia committed to providing modern, accessible, and secure banking services to its customers. The utilization of Information Technology ("IT") serves as the Company's primary foundation in addressing the evolving needs of customers amid the accelerating pace of digital transformation.

The strengthening of IT capabilities is considered a strategic priority to ensure reliable operational continuity while enhancing the Company's competitiveness in an increasingly competitive banking industry. BNC believes that IT development must be carried out incrementally, systematically, and comprehensively to support business growth, respond to market changes, and adapt to the rapid and dynamic technological developments.

Melalui penerapan TI yang didukung oleh kebijakan, prosedur, dan standar yang terarah, Perseroan berupaya mengoptimalkan pemanfaatan teknologi untuk menekan risiko operasional serta meningkatkan efisiensi layanan. Inisiatif ini sejalan dengan visi dan misi BNC dalam menyediakan layanan perbankan digital yang unggul dan berkelanjutan bagi masyarakat.

Peran TI dalam Menunjang Kinerja Usaha

Teknologi Informasi memiliki peran penting dalam mendukung kinerja usaha dan menjaga kelancaran operasional BNC. Implementasi TI yang efektif tidak hanya mendorong peningkatan produktivitas karyawan, tetapi juga memberikan pengalaman perbankan yang lebih optimal bagi nasabah.

Sepanjang tahun 2025, Perseroan telah merealisasikan sejumlah inisiatif strategis di bidang TI, antara lain:

1. Penguatan sistem inti perbankan *(Core Banking System*/CBS) melalui pengembangan dan penyempurnaan fitur pada core system untuk meningkatkan akurasi pemrosesan transaksi, stabilitas operasional, serta kesiapan sistem dalam mendukung pengembangan produk dan layanan digital.
2. Peningkatan kapabilitas aplikasi pendukung *(Surrounding Applications & Tools)* termasuk penguatan tools untuk pemantauan risiko, pencegahan fraud, serta kebutuhan *reporting* dan *monitoring*, yang menyerap porsi terbesar CAPEX TI sebagai fondasi tata kelola yang lebih kuat dan pengambilan keputusan berbasis data.
3. Pengembangan infrastruktur dan jaringan komunikasi guna memastikan ketersediaan layanan *(availability)*, kapasitas sistem, serta kualitas konektivitas yang andal dan konsisten seiring pertumbuhan aktivitas dan volume transaksi perbankan digital.
4. Pengembangan dan penyempurnaan *Mobile Banking* (Neo App) sebagai kanal utama interaksi nasabah untuk transaksi dan layanan keuangan, dengan realisasi investasi yang tetap berjalan dan menyediakan ruang akselerasi pengayaan fitur serta peningkatan pengalaman pengguna pada periode berikutnya.

Through the implementation of IT with the support of targeted policies, procedures, and standards, the Company strives to optimize the use of technology to mitigate operational risks and improve service efficiency. This initiative aligns with BNC's vision and mission to provide superior and sustainable digital banking services to the public.

The Role of IT in Supporting Business Performance

Information Technology plays a crucial role in supporting business performance and ensuring seamless operations at BNC. Effective IT implementation not only drives increased employee productivity but also delivers a more optimal banking experience for customers.

Throughout 2025, the Company has implemented a number of strategic initiatives in the IT sector, including:

1. Strengthening the Core Banking System (CBS) through the development and improvement of features within the core system to enhance transaction processing accuracy, operational stability, and the system's readiness to support the development of digital products and services.
2. Enhancement of supporting application capabilities (Surrounding Applications & Tools), including strengthening tools for risk monitoring, fraud prevention, as well as reporting and monitoring needs, which accounted for the largest portion of IT CAPEX as the foundation for stronger governance and data-driven decision-making.
3. Development of infrastructure and communication networks to ensure service availability, system capacity, and reliable and consistent connectivity quality in line with the growth of digital banking activities and transaction volumes.
4. Development and enhancement of Mobile Banking (Neo App) as the primary channel for customer interaction in financial transactions and services, with ongoing investment implementation and room for accelerated feature enrichment and user experience improvements in the coming period.

5. Penguatan sistem keamanan TI dan siber melalui peningkatan investasi di atas rencana awal sebagai langkah mitigasi untuk memperkuat proteksi data dan transaksi, memperluas pemantauan ancaman, serta meningkatkan ketahanan sistem terhadap dinamika risiko serangan siber yang terus berkembang.Dengan pendekatan yang terstruktur dan berkelanjutan, BNC terus berinovasi di bidang TI guna mempertahankan posisinya sebagai bank dengan layanan digital yang adaptif dan memberikan solusi terbaik bagi nasabah di seluruh Indonesia.

Tata Kelola TI

Perseroan secara konsisten memprioritaskan penguatan infrastruktur dan pembaruan platform digital sebagai bagian dari strategi transformasi digital. Pemanfaatan teknologi terkini diarahkan untuk mencapai tingkat skalabilitas, kinerja, dan ketersediaan sistem yang optimal, sekaligus memastikan kesiapan Perseroan dalam menjawab kebutuhan bisnis yang terus berkembang.

Dalam memperkuat tata kelola TI, BNC menerapkan berbagai langkah strategis yang berfokus pada peningkatan efisiensi operasional serta penguatan perlindungan data dan sistem informasi. Upaya ini bertujuan menciptakan nilai tambah bagi seluruh pemangku kepentingan sekaligus memperkuat posisi Perseroan di pasar.

Sebagai bagian dari pengelolaan TI yang terintegrasi, Perseroan memiliki Divisi IT Security & Governance yang bertanggung jawab dalam mengkoordinasikan penyusunan, penelaahan, dan pembaruan kebijakan, prosedur, serta standar di lingkungan Direktorat TI secara berkala agar senantiasa relevan dan patuh terhadap regulasi yang berlaku. Divisi ini juga melakukan pengawasan atas penerapan tata kelola TI yang mencakup infrastruktur, sistem aplikasi, dan keamanan TI, dengan melibatkan unit terkait lainnya. Langkah tersebut mendukung tersedianya layanan digital yang aman melalui produk dan transaksi berbasis teknologi.

5. Strengthening IT and cybersecurity systems through increased investment beyond the initial plan as a mitigation measure to reinforce data and transaction protection, expand threat monitoring, and enhance system resilience against the evolving dynamics of cyberattack risks. With a structured and sustainable approach, BNC continues to innovate in the IT field to maintain its position as a bank with adaptive digital services and provide the best solutions for customers throughout Indonesia.

IT Governance

The Company consistently prioritizes infrastructure improvement and digital platform upgrades as part of its digital transformation strategy. The use of cutting-edge technology is aimed at achieving optimal system scalability, performance, and availability, while ensuring the Company's readiness to meet evolving business needs.

To strengthen IT governance, BNC implements various strategic measures focused on improving operational efficiency and enhancing data and information system protection. These efforts aim to create added value for all stakeholders while strengthening the Company's market position.

As part of its integrated IT management, the Company has an IT Security & Governance Division responsible for coordinating the development, review, and periodic update of policies, procedures, and standards within the IT Directorate to ensure their relevance and compliance with applicable regulations. This division also oversees the implementation of IT governance, which encompasses infrastructure, application systems, and IT security by involving other related units. These measures support the provision of secure digital services through technology-based products and transactions.

IT Disruption

Disrupsi teknologi telah membawa perubahan signifikan pada industri perbankan dan mendorong bank untuk beradaptasi dengan ekspektasi nasabah yang semakin mengutamakan kemudahan dan kecepatan layanan. Digitalisasi proses bisnis secara *end-to-end* menjadi elemen kunci dalam menghadirkan layanan yang lebih efisien, aman, dan relevan.

Inovasi seperti *mobile banking*, *chatbot*, serta integrasi Application Programming Interface (API) memungkinkan penyediaan layanan yang lebih personal dan terhubung. Di sisi lain, pemanfaatan kecerdasan buatan (*artificial intelligence*) dan analitik data memberikan nilai tambah dalam memahami perilaku nasabah, mengelola risiko, serta menjaga keamanan transaksi dari ancaman siber yang terus berkembang.

Perseroan secara proaktif memanfaatkan peluang dari disrupsi teknologi dengan memperluas digitalisasi proses bisnis secara menyeluruh. Fokus utama diarahkan pada peningkatan kecepatan dan akurasi layanan, sekaligus memperkuat sistem keamanan informasi. Dengan tetap mengedepankan tata kelola TI yang patuh terhadap regulasi, Perseroan memastikan operasional yang efisien serta mendukung keberlanjutan bisnis di era transformasi digital.

Cybersecurity

Perseroan terus memperkuat keamanan siber melalui penerapan teknologi yang relevan dan tata kelola TI yang terintegrasi, termasuk pembentukan unit kerja khusus yang berfokus pada pengamanan siber. Untuk melindungi infrastruktur, aplikasi, dan data, Perseroan mengimplementasikan sistem keamanan yang memadai dan berlapis.

Sebagai bagian dari penguatan tersebut, BNC secara berkelanjutan meningkatkan kompetensi sumber daya manusia melalui program pelatihan dan sertifikasi di bidang keamanan siber. Selain itu, kegiatan *security awareness* juga dilaksanakan secara rutin kepada seluruh karyawan guna meningkatkan kewaspadaan terhadap risiko keamanan informasi. Seluruh upaya ini mencerminkan komitmen Perseroan dalam menghadapi tantangan keamanan siber di tengah pesatnya perkembangan teknologi digital.

IT Disruption

Technological disruption has brought significant changes to the banking industry and prompted banks to adapt to customer expectations that increasingly prioritize service convenience and speed. The digitalization of end-to-end business processes has become a key element in delivering more efficient, secure, and relevant services.

Innovations such as mobile banking, chatbots, and Application Programming Interface (API) integration enable the provision of more personalized and connected services. On the other hand, the use of artificial intelligence (AI) and data analytics provides added value in understanding customer behavior, managing risk, and safeguarding transactions against evolving cyber threats.

The Company proactively capitalizes on opportunities arising from technological disruption by comprehensively expanding the digitization of business processes. The primary focus is on enhancing service speed and accuracy while strengthening information security systems. By prioritizing IT governance that complies with regulations, the Company ensures efficient operations and supports business sustainability in the era of digital transformation.

Cybersecurity

The Company continues to strengthen cybersecurity through the implementation of relevant technologies and integrated IT governance, including the establishment of a dedicated unit focused on cybersecurity. To protect infrastructure, applications, and data, the Company implements adequate and layered security systems.

As part of these efforts, BNC continuously enhances the competencies of its human resources through training and certification programs related to cybersecurity. Additionally, security awareness activities are routinely conducted for all employees to heighten vigilance regarding information security risks. All these efforts reflect the Company's commitment to addressing cybersecurity challenges amidst the rapid advancement of digital technology.

Roadmap Perkembangan TI

Perseroan telah menetapkan Rencana Strategis Teknologi Informasi (RSTI) yang tertuang dalam Rencana Strategis Direktorat TI periode 2025-2027. Rencana ini dirancang untuk mendukung transformasi digital dan percepatan pertumbuhan bisnis Perseroan, yang terbagi ke dalam rencana jangka pendek dan jangka menengah sebagai berikut:

1. Rencana Jangka Pendek
   a. *Core Banking System* (CBS)
      Pengembangan fitur CBS dilakukan untuk mendukung inovasi produk dan layanan, memastikan ketersediaan data bagi kebutuhan operasional internal dan nasabah, memenuhi kebutuhan regulator, serta memudahkan integrasi dengan sistem pendukung lainnya.
   b. *Mobile Banking*
      Penyempurnaan fitur *Mobile Banking* difokuskan pada layanan sektor *Funding* dan *Lending*, serta pengembangan layanan tambahan yang relevan bagi nasabah individu, UMKM, dan korporasi, sejalan dengan percepatan transformasi digital perbankan.
   c. *Corporate Internet Banking* (CIB)
      Pengembangan CIB diarahkan untuk mendukung produk dan layanan baru pada sektor *Funding* dan *Lending*, meningkatkan kualitas layanan kepada nasabah korporasi.
   d. *Open Application Programming Interface* (Open-API)
      Penguatan platform *Open-API* bertujuan membuka peluang pengembangan produk dan layanan *Lending*, memperluas kerjasama dengan mitra perbankan dan UMKM, serta menghadirkan layanan yang lebih cepat, efisien, dan terjangkau bagi nasabah korporasi dan individu.
   e. Aplikasi Pendukung (*Surrounding Application*) dan *Tools*
      Pengembangan aplikasi pendukung dan *tools* dilakukan untuk meningkatkan kinerja bisnis, efisiensi operasional, pengelolaan risiko dan fraud, serta kepatuhan terhadap regulasi. Dari sisi eksternal, pengembangan ini juga mendukung pemantauan transaksi keuangan oleh mitra bisnis.

IT Development Roadmap

The Company has established an Information Technology Strategic Plan (RSTI) as outlined in the IT Directorate's Strategic Plan for the 2025–2027 period. This plan is designed to support the Company's digital transformation and accelerate business growth, divided into short-term and medium-term plans as follows:

1. Short-Term Plan
   a. Core Banking System (CBS)
      The development of CBS features aims to support product and service innovation, ensure data availability for internal operational needs and customer requirements, meet regulatory requirements, and facilitate integration with other supporting systems.
   b. Mobile Banking
      The improvement of Mobile Banking features is focused on services in the Funding and Lending sectors, as well as the development of additional services relevant to individual customers, MSMEs, and corporations, in line with the acceleration of banking digital transformation.
   c. Corporate Internet Banking (CIB)
      The development of CIB is aimed at supporting new products and services in the Funding and Lending sectors, improving service quality for corporate customers.
   d. Open Application Programming Interface (Open-API)
      The reinforcement of the Open-API platform aims to open opportunities for the development of Lending products and services, expand collaboration with banking partners and SMEs, and deliver faster, more efficient, and more affordable services for corporate and individual customers.
   e. Surrounding Applications and Tools

      The development of surrounding applications and tools is carried out to improve business performance, operational efficiency, risk and fraud management, and regulatory compliance. Externally, this development also supports financial transaction monitoring by business partners.

f. *Payment System*
Pengembangan sistem pembayaran difokuskan pada perluasan layanan yang terintegrasi dengan berbagai kanal pembayaran guna memberikan pengalaman transaksi yang aman, mudah, dan cepat bagi nasabah dan mitra Bank.
g. *Big Data & Analytics*
Pengembangan platform *Big Data & Analytics* diarahkan untuk mendukung pengambilan keputusan strategis dan operasional berbasis data, meningkatkan kinerja dan daya saing, serta memastikan ketersediaan data untuk kebutuhan pelaporan kepada regulator.

2. Rencana Jangka Menengah
a. Optimalisasi *cost saving* untuk meningkatkan efisiensi biaya operasional TI tanpa mengurangi kualitas layanan dan produktivitas, melalui pemanfaatan sumber daya yang dimiliki Bank;
b. Pelaksanaan *transfer knowledge* TI secara berkelanjutan dengan pihak ketiga guna meningkatkan kapasitas dan kemandirian SDM dalam mendukung operasional TI;
c. Pengembangan produk berbasis *Artificial Intelligence* (AI) untuk menghadirkan layanan inovatif, meningkatkan efisiensi operasional, serta memperkaya pengalaman nasabah;
d. Peningkatan kapasitas infrastruktur TI, baik DC maupun DRC, secara berkesinambungan yang mencakup perangkat keras, perangkat lunak, jaringan komunikasi, serta pemanfaatan *cloud computing*;
e. Penguatan sistem keamanan TI dan siber secara berkelanjutan melalui pengembangan sistem dan teknologi yang mendukung perlindungan data, kenyamanan transaksi nasabah dan mitra, kepatuhan terhadap regulasi, serta pemeliharaan kepercayaan nasabah.

f. Payment System
The development of the payment system is focused on expanding services that are integrated with various payment channels to provide a secure, easy, and fast transaction experience for customers and the Bank's partners.
g. Big Data & Analytics
The development of the Big Data & Analytics platform is aimed at supporting data-driven strategic and operational decision-making, improving performance and competitiveness, and ensuring data availability for regulatory reporting requirements.

2. Medium-Term Plan
a. Optimization of cost savings to improve IT operational cost efficiency without compromising service quality and productivity using the Bank's existing resources;
b. Continuous implementation of IT knowledge transfer with third parties to enhance the capacity and self-reliance of human resources in supporting IT operations;
c. Development of Artificial Intelligence (AI)-based products to deliver innovative services, improve operational efficiency, and enrich the customer experience;
d. Continuous improvement of IT infrastructure capacity, including Data Centers (DC) and Disaster Recovery Centers (DRC), which includes hardware, software, communication networks, and the utilization of cloud computing;
e. Continuous strengthening of IT and cybersecurity systems through the development of systems and technologies that support data protection, the convenience of transactions for customers and partners, regulatory compliance, and the maintenance of customer trust.

Pengelola TI

Pengelolaan dan pengembangan Teknologi Informasi (TI) di Perseroan berada di bawah koordinasi Direktorat TI. Direktorat ini didukung oleh enam unit kerja yang memiliki peran strategis dalam memastikan keandalan, efektivitas, dan efisiensi operasional TI di lingkungan Perseroan, yaitu:

1. IT Operation;
2. IT Development;
3. IT Security & Governance;
4. System Analyst;
5. Quality Assurance;
6. AI & Data Engineering

Dalam menjalankan fungsinya, Direktorat TI menerapkan prinsip *Segregation of Duties* (SOD) guna memastikan adanya pemisahan kewenangan, alur pelaporan, dan tanggung jawab di setiap fungsi TI. Penerapan prinsip ini bertujuan menjaga akurasi, meningkatkan pengendalian internal, serta menciptakan tata kelola TI yang lebih terstruktur dan andal.

Hingga akhir tahun 2025, Perseroan didukung oleh 77 personel TI. Setiap unit kerja dipimpin oleh Kepala Divisi dan/atau Kepala Function yang memiliki kompetensi serta pengalaman yang memadai, sehingga mampu mendukung pengelolaan TI secara efektif dan efisien sesuai dengan kebutuhan bisnis Perseroan.

Investasi dan Kegiatan TI Tahun 2025

Sepanjang tahun 2025, BNC memprioritaskan penguatan kapabilitas teknologi informasi sebagai pilar utama dalam membangun perbankan digital yang andal, aman, dan berkelanjutan. Investasi TI diarahkan secara strategis untuk memastikan kelancaran layanan, meningkatkan efektivitas pengendalian risiko, serta memperkuat kesiapan sistem dalam mendukung ekspansi produk dan pertumbuhan aktivitas transaksi yang semakin dinamis.

IT Directorate

The management and development of Information Technology (IT) within the Company are coordinated by the IT Directorate. This Directorate is supported by six units that play strategic roles in ensuring the reliability, effectiveness, and operational efficiency of IT within the Company, specifically:

1. IT Operations;
2. IT Development;
3. IT Security & Governance;
4. System Analyst;
5. Quality Assurance;
6. AI & Data Engineering

In carrying out its functions, the IT Directorate applies the Segregation of Duties (SOD) principle to ensure the separation of authority, reporting lines, and responsibilities within each IT function. The application of this principle aims to maintain accuracy, enhance internal controls, and create a more structured and reliable IT governance framework.

By the end of 2025, the Company is be supported by 77 IT personnel. Each work unit is led by a Division Head and/or Function Head who possesses adequate competence and experience, thereby enabling effective and efficient IT management in line with the Company's business needs.

IT Investments and Activities in 2025

Throughout 2025, BNC prioritizes the strengthening of information technology capabilities as a key pillar in building a reliable, secure, and sustainable digital banking system. IT investments are strategically directed to ensure service continuity, enhance risk control effectiveness, and strengthen system readiness to support product expansion and the increasingly dynamic growth of transaction activities.

Highlight Kinerja Investasi TI 2025
- CAPEX TI: Rp49,79 miliar (59% dari anggaran)
- OPEX TI: Rp16,92 miliar (80% dari anggaran)

Fokus Strategis Pemanfaatan Investasi
- Penguatan fondasi sistem inti (*core system strengthening*)
- Pengembangan *tools* pendukung operasional dan bisnis
- Peningkatan kapabilitas pengelolaan risiko dan kontrol internal
- Penguatan keamanan siber dan ketahanan sistem (*cyber resilience*)
- Peningkatan kesiapan sistem untuk mendukung ekspansi produk dan transaksi

Realisasi ini mencerminkan pendekatan investasi yang prudent dan terukur, dengan penekanan pada kualitas penguatan infrastruktur digital sebagai enabler utama pertumbuhan Perseroan yang berkelanjutan.

Area Prioritas CAPEX TI 2025

Berikut fokus utama realisasi CAPEX TI Perseroan:

1. Surrounding Application & Tools (Prioritas Tools Pendukung)
   - Realisasi Rp22,13 miliar (66% dari budget)
   - Pembayaran terealisasi Rp7,29 miliar

   Makna strategis:
   Investasi ini mencerminkan fokus Perseroan dalam memperkuat *supporting tools* yang krusial bagi operasional bank dengan layanan digital, termasuk:
   - pemantauan risiko dan indikasi fraud,
   - kebutuhan reporting dan dashboard kontrol,
   - tools pendukung efisiensi proses internal.

2. Infrastruktur & Jaringan Komunikasi (Memperkuat Fondasi Layanan)
   - Realisasi Rp15,03 miliar (77% dari budget)
   - Pembayaran terealisasi Rp11,96 miliar

   Makna strategis:
   Penguatan infrastruktur dan jaringan dilakukan untuk memastikan:
   - ketersediaan layanan (availability) tetap stabil,
   - kapasitas sistem memadai untuk beban transaksi,
   - kualitas pengalaman nasabah (user experience) lebih konsisten.

IT Investmentp Performance Highlights of 2025
- IT CAPEX: Rp49.79 billion (59% of the budget)
- IT OPEX: Rp16.92 billion (80% of the budget)

Strategic Focus of Investment Utilization
- Core system strengthening
- Development of operational and business support tools
- Enhancement of risk management and internal control capabilities
- Strengthening of cybersecurity and system resilience (cyber resilience)
- Improving system readiness to support product expansion and transactions

This realization reflects a prudent and measured investment approach, with an emphasis on the quality of digital infrastructure strengthening as the primary enabler of the Company's sustainable growth.

IT CAPEX Priority Areas in 2025

The following are the main focuses of the Company's IT CAPEX implementation:

1. Surrounding Applications & Tools (Priority Support Tools)
   - Realized Rp22.13 billion (66% of budget)
   - Realized payments: Rp7.29 billion

   Strategic meaning:
   This investment reflects the Company's focus on strengthening supporting tools that are crucial for the operations of a bank with digital services, including:
   - risk monitoring and fraud detection,
   - reporting needs and control dashboards,
   - tools supporting internal process efficiency.

2. Infrastructure & Communication Networks (Strengthening the Service Foundation)
   - Realized: Rp15.03 billion (77% of the budget)
   - Realized payments: Rp11.96 billion

   Strategic meaning:
   The strengthening of infrastructure and networks is carried out to ensure that:
   - service availability remains stable,
   - system capacity is adequate for transaction loads,
   - the quality of the customer experience (user experience) is more consistent.

3. Core Banking System (CBS) (Penyempurnaan Sistem Inti)
   - Realisasi Rp7,63 miliar (76% dari budget)
   - Pembayaran terealisasi Rp4,89 miliar

   Makna strategis:
   Penguatan CBS menjadi bagian penting dalam menjaga:
   - ketepatan pemrosesan transaksi,
   - reliabilitas sistem inti,
   - kesiapan sistem mendukung produk dan ekspansi layanan digital.

4. Mobile Banking (Neo App) (Masih Punya Ruang Akselerasi)
   - Realisasi Rp3,53 miliar (27% dari budget)
   - Pembayaran terealisasi Rp3,17 miliar

   Makna strategis:
   Hal ini mengindikasikan bahwa pengembangan kanal front-end tetap berjalan, namun masih terdapat ruang eksekusi untuk:
   - pengayaan fitur,
   - peningkatan stabilitas dan performa aplikasi,
   - akselerasi strategi penguatan engagement di tahun berikutnya.

5. Sistem Keamanan TI & Siber (Meningkat di atas Proyeksi)
   - Realisasi Rp1,46 miliar
   - Pembayaran teralisasi Rp2,69 miliar

   Makna strategis:
   Realisasi yang lebih tinggi dari rencana awal mencerminkan keputusan Perseroan untuk merespons kebutuhan nyata di lapangan, terutama:
   - meningkatnya kompleksitas ancaman siber,
   - tuntutan penguatan kontrol keamanan,
   - kebutuhan peningkatan proteksi data dan transaksi nasabah.

3. Core Banking System (CBS) (Core System Enhancement)
   - Realized Rp7.63 billion (76% of the budget)
   - Realized payments: Rp4.89 billion

   Strategic meaning:
   The strengthening of the CBS is a critical component to maintain:
   - the accuracy of transaction processing,
   - the reliability of the core system,
   - the system's readiness to support product offerings and digital service expansion.

4. Mobile Banking (Neo App) (Still Has Potential for Acceleration)
   - Realized: Rp3.53 billion (27% of budget)
   - Realized payments: Rp3.17 billion

   Strategic meaning:
   This indicates that front-end channel development is still ongoing, but there is still room for improvement in terms of:
   - feature enrichment,
   - enhancing application stability and performance,
   - accelerating engagement-strengthening strategies in the coming year.

5. IT & Cybersecurity Systems (Exceeding Projections)
   - Realized: Rp1.46 billion
   - Realized payments of Rp2.69 billion

   Strategic meaning:
   A higher-than-planned realization reflects the Company's decision to address actual on-the-ground needs, particularly:

   - the increasing complexity of cyber threats,
   - demands for strengthened security controls,
   - the need to enhance protection of customer data and transactions.

Highlight Utama TI 2025

- Menguatkan fondasi digital banking melalui investasi infrastruktur, tools, dan core system.
- Memperkuat kontrol risiko & fraud melalui pengembangan surrounding applications dan monitoring.
- Meningkatkan ketahanan keamanan siber, termasuk penguatan kebutuhan di atas proyeksi awal.
- Menjaga ruang akselerasi ke depan, khususnya untuk pengembangan Neo App dan inisiatif digital lanjutan 2026.

Rencana Pengembangan TI Tahun 2026

Memasuki 2026, Perseroan menyiapkan pengembangan TI yang lebih agresif namun tetap prudent, dengan pendekatan yang menggabungkan monetisasi layanan digital dan penguatan governance serta keamanan.

Akselerasi Transformasi Digital melalui Penguatan Infrastruktur, Pertumbuhan, dan Pengendalian Risiko

Memasuki tahun 2026, BNC menetapkan arah strategis teknologi informasi yang terstruktur dalam tiga pilar utama, yaitu penguatan sistem inti, akselerasi pertumbuhan digital melalui Neo App, serta peningkatan kapabilitas pengelolaan risiko dan kepatuhan. Strategi ini dirancang untuk mendukung ekspansi bisnis yang berkelanjutan, adaptif, dan tetap terkendali. Fokus Strategis TI 2026:

Pilar 1 — Core & Digital Core Banking (Alphabit & iCore)

Pengembangan difokuskan pada peningkatan kapabilitas sistem inti guna mendukung efisiensi dan keandalan operasional:

- Upgrade CBS Alphabit
  a. Pengaturan *grace period* sebelum *dormant fee*
  b. Pemisahan *General Ledger* (GL) untuk *incoming transfer*
- Upgrade iCore untuk penguatan fitur loan & deposit:
  a. repayment plan,
  b. write-off conversion,
  c. *auto close* rekening saldo 0,
  d. tenor hingga 60 bulan,
  e. penguatan reporting cabang (RAK/neraca).

Key IT Highlights of 2025

- Strengthening the foundation of digital banking through investments in infrastructure, tools, and core systems.
- Strengthening risk and fraud controls through the development of surrounding applications and monitoring.
- Enhancing cybersecurity resilience, including addressing needs exceeding initial projections.
- Maintaining room for future acceleration, particularly for the development of the Neo App and ongoing digital initiatives in 2026.

IT Development Plan for 2026

Heading into 2026, the Company is preparing for more aggressive yet prudent IT development, with an approach that combines the monetization of digital services with strengthened governance and security.

Accelerating Digital Transformation through Infrastructure Strengthening, Growth, and Risk Management

Moving into 2026, BNC has established a structured strategic direction for information technology centered on three main pillars: strengthening core systems, accelerating digital growth through the Neo App, and enhancing risk management and compliance capabilities. This strategy is designed to support sustainable, adaptive, and controlled business expansion. 2026 IT Strategic Focus:

Pillar 1 — Core & Digital Core Banking (Alphabit & iCore)

The development focuses on enhancing core system capabilities to support operational efficiency and reliability:

- Upgrade of the Alphabit Core Banking System (CBS)
  a. Implementation of a grace period before a dormant fee is applied
  b. Separation of the General Ledger (GL) for incoming transfers
- iCore upgrade to strengthen loan & deposit features:
  a. repayment plan,
  b. write-off conversion,
  c. auto close of zero balance accounts,
  d. tenor up to 60 months,
  e. enhanced branch reporting (RAK/balance sheet).

Pilar 2 — Neo App (Mobile Banking) sebagai Growth Engine

Roadmap 2026 menempatkan Neo App sebagai pusat pertumbuhan bisnis melalui:

1. Monetisasi & transaksi
   - PengembanganBNPL sebagai *source of fund* transaksi QRIS
   - Penguatan QRIS (CPM/TTS/*cross-border*)
   - Pengembangan fitur kartu debit GPN dan integrasi kanal pembayaran lain
2. Penguatan DPK & *value-added services*
   - deposito diskonto & *tiering*
   - *bancassurance digital phase* 2
   - *digital gold* (penukaran ke fisik)
   - *top up* BCA Flazz
   - akses obligasi pasar sekunder
3. *Engagement & loyalty*
   - Pengembangan *loyalty points*
   - Pembaruan skema *membership*
   - Penyediaan *tools* promosi dan *tracking* aplikasi

Pilar 3 — Risk, Fraud, Monitoring & Compliance Tools

Penguatan sistem pengendalian untuk mendukung pertumbuhan digital yang sehat dan terkendali:

- Implementasi *Collection Management System* terintegrasi (WhatsApp & autodial)
- Pengembangan *Behaviour Monitoring System*
- Penyempurnaan *Fraud Detection System* fase 2
- Monitoring GWM terintegrasi dengan BI-RTGS
- Implementasi *Audit Management System* (Neo Smart/CACM)
- Pelaksanaan audit independen sistem pembayaran (PSP)
- Peningkatan keamanan TI dan *monitoring tools*
- Penguatan *project management tools*

Secara keseluruhan, ketiga pilar ini mencerminkan pendekatan BNC yang seimbang antara akselerasi inovasi digital dan penguatan tata kelola, sehingga mampu menciptakan pertumbuhan yang berkelanjutan sekaligus menjaga kepercayaan pemangku kepentingan.

Pillar 2 — Neo App (Mobile Banking) as the Growth Engine

The 2026 Roadmap positions the Neo App as the center of business growth through:

1. Monetization & transactions
   - Development of BNPL as a source of fund in QRIS transactions
   - Strengthening of QRIS (CPM/TTS/cross-border)
   - Development of GPN debit card features and integration of other payment channels
2. Strengthening Third-Party Funds & value-added services
   - Discounted deposits & tiering
   - digital bancassurance phase 2
   - digital gold (redemption for physical gold)
   - top up BCA Flazz
   - access to secondary market bonds
3. Engagement & loyalty
   - Development of loyalty points
   - Updates to the membership scheme
   - Provision of promotional tools and app tracking

Pillar 3 — Risk, Fraud, Monitoring & Compliance Tools

Strengthening control systems to support healthy and controlled digital growth:

- Implementation of an integrated Collection Management System (WhatsApp & autodial)
- Development of a Behavior Monitoring System
- Phase 2 enhancement of the Fraud Detection System
- Integrated GWM monitoring with BI-RTGS
- Implementation of the Audit Management System (Neo Smart/CACM)
- Conducting independent audits of payment systems (PSP)
- Enhancing IT security and monitoring tools
- Strengthening project management tools

Overall, these three pillars reflect BNC's balanced approach between accelerating digital innovation and strengthening governance, thereby enabling sustainable growth while maintaining stakeholder trust.

Adapun, dalam menjaga privasi dan keamanan data nasabah, Perseroan telah menerapkan beberapa hal terhadap SDM, yaitu antara lain:

- Memiliki ketentuan internal formal terkait dengan Pelindungan Data Pribadi dan Keamanan Informasi yang ditetapkan oleh pihak Manajemen serta melakukan pengkinian secara berkala sesuai dengan ketentuan yang berlaku.
- SDM berkewajiban untuk mematuhi ketentuan Ketentuan tersebut
- Menandatangani Pakta Integritas dan *Non Disclosure Agreement* (NDA) yang mengatur kewajiban menjaga data dan komitmen ini berlaku selama masa kerja dan setelah hubungan kerja berakhir.
- Mengikuti pelatihan *security awareness program* secara berkala termasuk perlindungan data, simulasi *phishing* dan *social engineering*
- Menggunakan akses sistem hanya sesuai tugas dan kewenangan dengan menerapkan mekanisme *least privilege* dan *Segregation of Duties* (SOD)
- Dilakukan review user akses serta monitoring aktivitas pengguna secara berkala.
- Melaporkan indikasi insiden, pelanggaran, atau potensi kebocoran data secara segera mungkin ke tim terkait
- Setiap kelalaian atau pelanggaran keamanan data akan dikenakan sanksi disiplin sesuai dengan ketentuan yang berlaku

Perseroan berkomitmen memastikan SDM memahani dan menjaga privasi dan keamanan data nasabah melalui penerapan kebijakan yang tegas, peningkatan kompetensi berkelanjutan, pengendalian akses yang ketat, pengawasan aktivitas, serta penegakan sanksi yang konsisten.

Furthermore, to safeguard customer data privacy and security, the Company has implemented several measures regarding its human resources, including:

- Establishing formal internal regulations regarding Personal Data Protection and Information Security set by Management and updating them periodically in accordance with applicable regulations.
- Human resources are obligated to comply with these regulations
- Signing an Integrity Pact and a Non Disclosure Agreement (NDA) governing the obligation to safeguard data; this commitment remains in effect during employment and after the employment relationship ends.
- Participating in periodic security awareness program training, including data protection, phishing simulations, and social engineering.
- Using system access only in accordance with duties and authority by implementing least privilege and Segregation of Duties (SOD) mechanisms
- Conducting periodic reviews of user access and monitoring user activities.
- Reporting indications of incidents, violations, or potential data breaches as soon as possible to the relevant team
- Any negligence or data security violation will be subject to disciplinary action in accordance with applicable regulations

The Company is committed to ensuring that its personnel understand and safeguard customer data privacy and security through the implementation of strict policies, continuous competency development, strict access controls, activity monitoring, and consistent enforcement of sanctions.



Analisis dan Pembahasan Manajemen

Management Discussion and Analysis



Tinjauan Makroekonomi
Macroeconomic Overview



Sampai akhir tahun 2025, lanskap ekonomi global masih diwarnai dinamika yang kompleks seiring meningkatnya ketidakpastian, baik dari sisi pertumbuhan maupun inflasi. Pergerakan pasar keuangan internasional dipengaruhi oleh perubahan kebijakan tarif perdagangan, tekanan inflasi di Amerika Serikat yang sempat melampaui target, serta pelemahan sejumlah indikator ketenagakerjaan. Selain itu, ketegangan geopolitik di beberapa kawasan, termasuk Timur Tengah, tetap menjadi risiko yang berpotensi menghambat pemulihan ekonomi global dan mengganggu rantai pasokan sehingga mendorong kenaikan harga komoditas dan tekanan inflasi.

Perlambatan pertumbuhan ekonomi terjadi secara luas di berbagai negara utama, baik maju maupun berkembang, seperti Amerika Serikat, Inggris, kawasan Eropa, dan Tiongkok, meskipun dengan derajat perlambatan yang berbeda-beda. Dari sisi inflasi, tekanan masih relatif tinggi di Amerika Serikat dan Eropa, sementara Inggris cenderung lebih stabil dan Tiongkok masih dibayangi risiko deflasi walaupun mulai menunjukkan tanda perbaikan permintaan domestik. Menyikapi kondisi tersebut, otoritas moneter global cenderung mengambil langkah lebih hati-hati; The Federal Reserve menurunkan suku bunga acuannya sebesar 25 basis poin ke kisaran 4,00%–4,25%, sedangkan sejumlah bank sentral lain memilih mempertahankan suku bunga sambil menyesuaikan bauran kebijakan dengan kondisi domestik masing-masing.

As of the end of 2025, the global economic landscape remained characterized by complex dynamics amid heightened uncertainty, both in terms of growth and inflation. International financial market movements were influenced by shifts in trade tariff policies, inflationary pressures in the United States that temporarily exceeded targets, and the weakening of several labor market indicators. In addition, geopolitical tensions in various regions, including the Middle East, continued to pose risks that could hinder global economic recovery and disrupt supply chains, thereby driving commodity price increases and inflationary pressures.

Economic growth deceleration was observed across major economies, both advanced and emerging, including the United States, the United Kingdom, Europe, and China, albeit with varying degrees. From an inflation perspective, pressures remained relatively high in the United States and Europe, while the United Kingdom showed more stability and China continued to face deflationary risks despite early signs of improving domestic demand. In response, global monetary authorities generally adopted a more cautious stance; the Federal Reserve lowered its benchmark interest rate by 25 basis points to the range of 4.00%–4.25%, while several other central banks opted to maintain rates while adjusting their policy mix in line with domestic conditions.

Di tengah ketidakpastian global, perekonomian Indonesia tetap menunjukkan ketahanan yang baik. Pada Triwulan IV-2025, pertumbuhan ekonomi Indonesia tercatat sebesar 5,39% (yoy), lebih tinggi dibandingkan Triwulan III-2025 yang sebesar 5,04% (yoy) dan di atas capaian periode yang sama tahun sebelumnya. Secara keseluruhan, ekonomi Indonesia sepanjang 2025 tumbuh sekitar 5,11%, meningkat dibandingkan 5,03% pada 2024 dan menjadi salah satu tingkat pertumbuhan tertinggi sejak 2022. Kinerja ini ditopang terutama oleh konsumsi rumah tangga yang tetap kuat, inflasi yang terjaga dalam rentang sasaran, serta kontribusi positif ekspor dan investasi, termasuk pertumbuhan Pembentukan Modal Tetap Bruto (PMTB) di berbagai sektor.

Dari sisi stabilitas harga, inflasi IHK pada Desember 2025 tercatat sekitar 2,92% (yoy), masih berada dalam kisaran target Bank Indonesia 2,5%-3,1%. Bank Indonesia mempertahankan BI Rate pada level 4,75% hingga akhir 2025 sebagai bagian dari bauran kebijakan moneter untuk menjaga stabilitas nilai tukar dan inflasi sekaligus mendukung momentum pertumbuhan ekonomi domestik. Kombinasi ketahanan permintaan domestik, inflasi yang terkendali, dan kebijakan moneter yang hati-hati menjadi fondasi penting bagi stabilitas makroekonomi Indonesia di tengah tekanan eksternal.

Ketahanan ekonomi domestik juga tercermin pada sektor perbankan yang tetap solid hingga akhir 2025. Pertumbuhan kredit perbankan nasional sepanjang 2025 tercatat sekitar 9,6% (yoy), sedikit melambat dibandingkan pertumbuhan sekitar 10,4% (yoy) pada 2024 namun masih menunjukkan tren ekspansi yang sehat. Peningkatan penyaluran kredit terutama didorong oleh segmen korporasi dan sektor-sektor produktif seperti industri pengolahan, pertambangan, dan pembiayaan kepemilikan rumah tinggal, dengan dukungan konsumsi rumah tangga yang tetap kuat. Dari sisi pendanaan, Dana Pihak Ketiga (DPK) industri perbankan tumbuh kuat sekitar 13,8% (yoy) hingga akhir 2025, meningkat dibandingkan kisaran pertumbuhan sekitar 7–8% (yoy) pada tahun sebelumnya dan mencerminkan kepercayaan masyarakat yang tetap tinggi terhadap perbankan nasional.

Amid global uncertainty, Indonesia's economy continued to demonstrate solid resilience. In the fourth quarter of 2025, Indonesia's economic growth reached 5.39% (yoy), higher than 5.04% (yoy) in the third quarter of 2025 and above the level recorded in the same period of the previous year. Overall, Indonesia's economy grew by approximately 5.11% in 2025, improving from 5.03% in 2024 and representing one of the highest growth rates since 2022. This performance was primarily supported by strong household consumption, inflation maintained within the target range, and positive contributions from exports and investment, including growth in Gross Fixed Capital Formation (GFCF) across various sectors.

From a price stability perspective, the Consumer Price Index (CPI) inflation in December 2025 was recorded at approximately 2.92% (yoy), remaining within Bank Indonesia's target range of 2.5%-3.1%. Bank Indonesia maintained the BI Rate at 4.75% throughout 2025 as part of its monetary policy mix to safeguard exchange rate and inflation stability while supporting domestic economic growth momentum. The combination of resilient domestic demand, controlled inflation, and prudent monetary policy formed a strong foundation for Indonesia's macroeconomic stability amid external pressures.

Domestic economic resilience was also reflected in the banking sector, which remained solid through the end of 2025. National banking credit growth reached approximately 9.6% (yoy) in 2025, slightly moderating from around 10.4% (yoy) in 2024, yet still indicating a healthy expansion trend. Credit growth was primarily driven by corporate segments and productive sectors such as manufacturing, mining, and housing financing, supported by sustained household consumption. On the funding side, Third Party Funds (TPF) in the banking industry grew strongly by approximately 13.8% (yoy) by the end of 2025, compared to around 7–8% (yoy) in the previous year, reflecting continued strong public confidence in the national banking system.

Kondisi likuiditas perbankan secara agregat berada pada level yang memadai dan jauh di atas ketentuan minimum regulator, tercermin dari rasio-rasio likuiditas utama seperti AL/NCD dan AL/DPK yang tetap berada di atas threshold OJK. Sementara angka detail AL/NCD dan AL/DPK per Desember 2025 masih menunggu publikasi resmi LSPI Triwulan IV-2025, data hingga Triwulan III-2025 menunjukkan rasio AL/NCD sekitar 130% dan AL/DPK sekitar 29%, menegaskan kelonggaran likuiditas sistem perbankan. Di sisi permodalan, rasio kecukupan modal (CAR) industri perbankan nasional bertahan di kisaran 26% hingga akhir 2025, mencerminkan struktur permodalan yang kuat dan memberikan bantalan yang memadai terhadap potensi peningkatan Aset Tertimbang Menurut Risiko (ATMR).

Overall banking liquidity conditions remained adequate and well above regulatory minimum thresholds, as reflected in key liquidity ratios such as AL/NCD and AL/DPK, which consistently stayed above OJK thresholds. While detailed figures for AL/NCD and AL/DPK as of December 2025 are still pending official publication in the Q4 2025 Indonesian Banking Statistics (LSPI), data up to Q3 2025 indicated AL/NCD of approximately 130% and AL/DPK of around 29%, underscoring ample system liquidity. From a capital perspective, the Capital Adequacy Ratio (CAR) of the national banking industry remained at around 26% through the end of 2025, reflecting a strong capital structure and sufficient buffers against potential increases in Risk-Weighted Assets (RWA).

Kualitas aset perbankan juga menunjukkan perbaikan berkelanjutan. Hingga menjelang akhir 2025, rasio kredit bermasalah (NPL) gross industri berada di kisaran 2,0–2,1%, sementara NPL net sekitar 0,8%, yang menunjukkan bahwa risiko kredit tetap terkendali di tengah pemulihan aktivitas ekonomi. Tren positif kualitas aset ini turut tercermin pada segmen Bank Perekonomian Rakyat (BPR) dan Bank Pembiayaan Rakyat Syariah (BPRS) yang tetap mencatatkan pertumbuhan dana pihak ketiga dan penyaluran kredit/pembiayaan, meskipun lebih moderat dan disertai peningkatan rasio kredit/pembiayaan bermasalah di beberapa segmen yang perlu diantisipasi melalui penguatan mitigasi risiko.

Banking asset quality also continued to improve. Toward the end of 2025, the industry's gross Non-Performing Loan (NPL) ratio stood at around 2.0%–2.1%, with net NPL at approximately 0.8%, indicating that credit risk remained well controlled amid ongoing economic recovery. This positive trend was also observed in the Rural Banks (BPR) and Sharia Rural Banks (BPRS) segments, which continued to record growth in third-party funds and credit/financing, albeit at a more moderate pace and accompanied by rising NPL levels in certain segments that require strengthened risk mitigation measures.

Secara keseluruhan, ketahanan ekonomi nasional, stabilitas sektor perbankan, dan respons kebijakan moneter yang adaptif menjadi pilar utama dalam menjaga momentum pertumbuhan Indonesia di tengah tekanan global sepanjang 2025. Kondisi ini memberikan ruang bagi industri perbankan, termasuk PT Bank Neo Commerce Tbk, untuk terus mengembangkan bisnis secara berkelanjutan dengan tetap mengedepankan prinsip kehati-hatian dan manajemen risiko yang prudent. Stabilitas makroekonomi yang terjaga juga tercermin dalam kinerja Perseroan yang menunjukkan perbaikan signifikan, antara lain melalui pencapaian laba bersih sekitar Rp565,7 miliar pada tahun 2025 serta penguatan fundamental permodalan dan efisiensi operasional.

Overall, the resilience of the national economy, the stability of the banking sector, and adaptive monetary policy responses served as key pillars in maintaining Indonesia's growth momentum amid global pressures throughout 2025. These conditions provide room for the banking industry, including PT Bank Neo Commerce Tbk, to continue developing its business sustainably while upholding prudential principles and sound risk management. Stable macroeconomic conditions were also reflected in the Company's performance, which showed significant improvement, including the achievement of net profit of approximately Rp565.7 billion in 2025, along with strengthened capital fundamentals and operational efficiency.

Tinjauan Makro Segmen Industri Perbankan

Macroeconomic Overview of the Banking Industry Segment

Hingga akhir 2025, industri perbankan nasional mempertahankan ketahanan yang kuat di tengah tekanan eksternal, tercermin dari profil risiko yang terkendali, permodalan yang solid, dan likuiditas yang melimpah. Pertumbuhan kredit sekitar 9,6% (yoy) dan DPK sekitar 13,8% (yoy) menunjukkan bahwa fungsi intermediasi tetap berjalan, dengan porsi yang meningkat pada sektor-sektor produktif dan korporasi. Pertumbuhan DPK yang lebih tinggi dibandingkan kredit mencerminkan pendekatan yang lebih hati-hati dalam mengelola ekspansi dan risiko, sekaligus memperkuat basis pendanaan domestik perbankan.

As of the end of 2025, the national banking industry maintained strong resilience amid external pressures, as reflected in well-controlled risk profiles, solid capitalization, and ample liquidity. Credit growth of approximately 9.6% (yoy) and Third Party Funds (TPF) growth of around 13.8% (yoy) indicate that the intermediation function continued to operate effectively, with an increasing share allocated to productive sectors and corporate financing. The higher growth of TPF compared to credit reflects a more prudent approach in managing expansion and risks, while strengthening the domestic funding base of the banking industry.

Profil risiko industri berada pada level yang terkelola dengan baik, dengan rasio NPL gross di kisaran 2,0–2,1% dan *NPL net* sekitar 0,8%, serta rasio *Loan at Risk* (LaR) yang relatif stabil di bawah 9%. Sementara itu, rasio CAR industri di kisaran 26% dan indikator likuiditas utama yang berada jauh di atas ketentuan minimum menunjukkan ruang yang cukup bagi bank untuk menyerap potensi guncangan dan tetap mendukung pertumbuhan kredit secara selektif.

The industry's risk profile remained well managed, with gross NPL ratios in the range of 2.0%–2.1%, net NPL around 0.8%, and Loan at Risk (LaR) ratios relatively stable below 9%. Meanwhile, the industry's CAR ratio at around 26% and key liquidity indicators well above regulatory minimums indicate sufficient capacity for banks to absorb potential shocks while continuing to support selective credit growth.

Bagi Bank Neo Commerce, dinamika dan peluang di industri perbankan tersebut menjadi pijakan untuk memperkuat strategi bisnis yang adaptif dan berkelanjutan, antara lain dengan menjaga disiplin pengelolaan likuiditas, memperluas basis pendanaan dana murah, serta mendorong penyaluran kredit secara selektif dengan fokus pada kualitas aset. Transformasi digital yang dijalankan Perseroan turut menjadi faktor penting dalam peningkatan efisiensi operasional dan daya saing di tengah tekanan margin dan profitabilitas yang dialami sektor perbankan secara umum. Dengan fondasi tersebut, Perseroan berupaya menjaga keseimbangan antara pertumbuhan bisnis, kualitas aset, dan keberlanjutan kinerja jangka panjang di tengah dinamika makroekonomi dan industri yang terus berkembang.

For Bank Neo Commerce, the dynamics and opportunities within the banking industry serve as a foundation to strengthen adaptive and sustainable business strategies, including maintaining disciplined liquidity management, expanding low-cost funding base, and encouraging selective credit distribution with a focus on asset quality. The Company's ongoing digital transformation also plays a key role in enhancing operational efficiency and competitiveness amid margin and profitability pressures faced by the banking sector. With this foundation, the Company strives to maintain a balance between business growth, asset quality, and long-term performance sustainability amid evolving macroeconomic and industry dynamics.

Tinjauan Operasi Per Segmen Usaha

Operational Overview per Business Segment



Dalam menjalankan kegiatan usahanya, Perseroan mengelompokkan aktivitas perbankan ke dalam tiga lini bisnis utama, yaitu segmen perkreditan, segmen penghimpunan dana pihak ketiga, dan segmen tresuri. Pengelompokan ini bertujuan untuk mendukung pengelolaan kinerja yang lebih terfokus, terukur, dan selaras dengan strategi bisnis Perseroan. Uraian kinerja masing-masing segmen disampaikan sebagai berikut.

In conducting its business operations, the Company categorizes its banking activities into three main business lines: loan segment, third-party deposit segment, and treasury segment. This categorization aims to support performance management to be more focused, measurable, and aligned with the Company's business strategy. A description of each segment's performance is provided below.

Segmen Perkreditan

Kegiatan perkreditan Perseroan terbagi ke dalam lima kategori utama, yang meliputi:
1. Kredit konsumsi;
2. Kredit modal kerja;
3. Kredit rekening koran;
4. Kredit karyawan.

Rincian saldo kredit yang disalurkan Perseroan pada tahun 2025 dan 2024 disajikan dalam tabel berikut:

Loan Segment

The Company's lending activities are divided into five main categories, which include:
1. Consumer loans;
2. Working capital loans;
3. Demand loans;
4. Employee loans.

Details of the loan balances disbursed by the Company in 2025 and 2024 are presented in the following table:

dalam jutaan Rupiah | in million Rupiah

Jenis Kredit Type of Loans	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase Percentage (%)
Konsumsi Consumption	5.571.758	6.208.477	(636.719)	-10,26%
Modal Kerja Working Capital	1.364.512	2.558.847	(1.194.335)	-46,67%
Pinjaman Rekening Koran Demand Loan	47.690	39.456	8.234	20,87%
Karyawan Employees	8.572	15.172	(6.600)	-43,50%
Investasi Investment	190.048	194	189.854	97862,89%
Jumlah Total	7.182.580	8.822.146	(1.639.556)	-18,58%

Pada tahun 2025, total Kredit yang Diberikan tercatat sebesar Rp7.182 miliar, menurun dibandingkan realisasi tahun 2024 sebesar Rp8.822 miliar. Penurunan ini sejalan dengan langkah Bank dalam memperkuat penerapan manajemen risiko kredit terhadap debitur baru maupun debitur eksisting. Upaya tersebut meliputi peningkatan kualitas *risk assessment* pada proses pengajuan kredit, pemantauan berkelanjutan atas kualitas aset produktif dan kecukupan cadangan kerugian penurunan nilai, penguatan aktivitas *collection*, serta pelaksanaan hapus buku atas debitur dengan kualitas kredit tidak lancar.

In 2025, total Loans were Rp7,182 billion, down from Rp8,822 billion in 2024. This decline is in line with the Bank's efforts to improve credit risk management for both new and existing debtors. These efforts encompass improvements in the quality of risk assessment during the loan application process, continuous monitoring of the quality of earning assets and the adequacy of impairment reserves, strengthening of collection actions, and the write-off of non-performing debtors.

Kredit yang Diberikan berdasarkan Sektor Ekonomi

Rincian Kredit yang Diberikan berdasarkan sektor ekonomi untuk tahun 2025 dan 2024 disajikan dalam tabel berikut:

Loans by Economic Sector

Details of loans granted by economic sector in 2025 and 2024 are presented in the following table:

dalam jutaan Rupiah | in million Rupiah

Jenis Kredit Type of Loans	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase Percentage (%)
Rumah tangga Household	5.594.850	6.223.662	(628.812)	-10,10%
Real estate, usaha persewaan dan jasa perusahaan Real estate, leasing and corporate service	273.304	675.666	(402.362)	-59,55%
Jasa masyarakat, sosial budaya, hiburan dan perorangan lainnya Community Services, social culture, entertainment and other individuals	444.629	702.126	(257.497)	-36,67%
Perdagangan besar dan eceran Wholesale and retail trade	468.089	131.949	336.140	254,75%
Pertanian, perburuan dan kehutanan Agriculture, hunting and forestry	-	100.000	(100.000)	-100,00%
Konstruksi Construction	-	44.200	(44.200)	-100,00%
Industri pengolahan Manufacturing	82.134	910.086	(827.952)	-90,98%
Pertambangan Mining	319.574	34.457	285.117	827,46%
Jumlah Total	7.182.580	8.822.146	(1.639.566)	-18,58%

Berdasarkan sektor ekonomi, penyaluran kredit Perseroan pada tahun 2025 masih didominasi oleh sektor rumah tangga, dengan nilai sebesar Rp5.595 miliar atau 77,89%, meskipun secara proporsi mengalami penyesuaian dibandingkan tahun 2024 yang tercatat sebesar Rp6.224 miliar atau 70,55%.

Based on economic sectors, the Company's lending in 2025 was still dominated by the household sector, with a value of Rp5,595 billion or 77.89%, although this proportion saw an adjustment compared to 2024, which stood at Rp6,224 billion or 70.55%.

Sementara itu, sektor industri perdagangan besar dan eceran tetap menunjukkan pertumbuhan signifikan pada tahun 2025, sejalan dengan kinerja positif sektor tersebut di tingkat nasional. Pada tahun 2025, kredit ke sektor industri perdagangan besar dan eceran tercatat sebesar Rp468 miliar, meningkat sekitar 254,75% dibandingkan tahun 2024 sebesar Rp132 miliar seiring dengan pertumbuhan PDB perdangan besar dan eceran nasional.

Meanwhile, the wholesale and retail trade sector continued to show significant growth in 2025, in line with the sector's positive performance at the national level. In 2025, credit to the wholesale and retail trade sector stood at Rp468 billion, an increase of approximately 254.75% compared to Rp132 billion in 2024, in line with the growth of the national wholesale and retail trade GDP.

Peningkatan kredit juga tercatat pada sektor pertambangan yang pada tahun 2025 menunjukkan tren pertumbuhan berkelanjutan. Pada tahun 2025, kredit pada sektor ini meningkat sebesar Rp285 miliar atau 827,46% dibanding tahun 2024 sebesar Rp34 miliar, sejalan dengan strategi pemerintah dalam rangka hilirisasi pertambangan.

An increase in loans was also recorded in the mining sectors, which showed a sustained growth trend in 2025. In 2025, lending to this sector increased by Rp285 billion, or 827.46%, compared to Rp34 billion in 2024, in line with the government's strategy to promote downstream mining.

Kredit yang Diberikan berdasarkan Kolektibilitas

Loans by Collectibility

Rincian Kredit yang Diberikan berdasarkan tingkat kolektibilitas untuk tahun 2025 dan 2024 disajikan dalam tabel berikut:

Details of loans by collectibility level in 2025 and 2024 are presented in the following table:

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Lancar Current	6.241.128	7.695.707	(1.454.579)	-18,90%
Dalam perhatian khusus Special mention	684.367	835.152	(150.785)	-18,05%
Kurang lancar Substandard	206.088	67.004	139.084	207,58%
Diragukan Doubtful	19.308	29.598	(10.290)	-34,77%
Macet Loss	31.689	194.685	(162.996)	-83,72%
Jumlah Total	7.182.580	8.822.146	(1.639.566)	-18,58%

Berdasarkan klasifikasi kolektibilitas yang ditetapkan oleh Bank Indonesia, Perseroan mencatat peningkatan porsi kredit bermasalah pada tahun 2025 sebesar 3,58%, dibandingkan dengan 3,30% pada tahun 2024. Peningkatan NPL tersebut dikarenakan adanya pemburukan kualitas debitur komersial yang bergerak di bidang kontraktor pertambangan.

Based on the collectibility classification established by Bank Indonesia, the Company recorded an increase in the proportion of non-performing loans in 2025 to 3.58%, compared to 3.30% in 2024. This increase in NPLs was due to a deterioration in the credit quality of commercial borrowers operating in the mining contracting sector.

Dalam menyalurkan kredit, Perseroan secara konsisten menerapkan prinsip kehati-hatian sesuai dengan ketentuan Otoritas Jasa Keuangan dan kebijakan internal manajemen. Pengelolaan risiko kredit dilakukan melalui diversifikasi portofolio berdasarkan segmen usaha, sektor industri, dan profil debitur, disertai dengan pemantauan kualitas aset produktif, penguatan aktivitas remedial, serta pembentukan cadangan kerugian penurunan nilai yang memadai.

In extending loans, the Company consistently applies the principle of prudence in accordance with the regulations of the Financial Services Authority and internal management policies. The management of credit risk is carried out through portfolio diversification based on business segments, industrial sectors, and borrower profiles, accompanied by monitoring the quality of earning assets, strengthening remedial activities, and establishing adequate provisions for impairment losses.

Pada tahun 2025, Perseroan telah membentuk cadangan kerugian penurunan nilai sebesar Rp 515 miliar. Cadangan kerugian penurunan nilai yang dibentuk mencapai 200,34% total kredit dengan kualitas tidak lancar sebagai salah satu langkah Perseroan dalam mengelola risiko kredit.

As of 2025, the Company had established an impairment loss provision of Rp 515 billion. The impairment loss provision established amounted to 200.34% of total non-performing loans, as part of the Company's efforts to manage credit risk.

Segmen Penghimpunan Dana Pihak Ketiga (DPK)

Dana Pihak Ketiga (DPK) merupakan sumber pendanaan utama Perseroan yang berasal dari masyarakat dalam bentuk giro, tabungan, dan deposito berjangka. Produk-produk tersebut memiliki peran penting dalam menjaga stabilitas likuiditas dan mendukung pertumbuhan bisnis Perseroan.

Third-Party Funds (DPK) Collection Segment

Third-Party Funds (DPK) are the Company's primary funding source from the public and consist of current accounts, savings accounts, and time deposits. These products are vital in maintaining the stability of the Company's liquidity and supporting its business growth.

Rincian saldo DPK tahun 2025 dan 2024 disajikan dalam tabel berikut:

Details of the DPK balance in 2025 and 2024 are presented in the following table:

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Giro Current Accounts	667.381	4,76%	514.834	3,94%	152.547	29,63%
Tabungan Saving Accounts	3.501.410	24,96%	3.095.982	23,70%	405.428	13,10%
Deposito Berjangka Time Deposits	9.847.200	70,21%	9.430.096	72,18%	417.104	4,42%
Deposito On Call Deposits On Call	10.151	0,07%	22.880	0,18%	(12.729)	-55,63%
Jumlah Total	14.026.142	100%	13.063.792	100,00%	962.350	7,37%

Pada tahun 2025, total DPK yang dihimpun Perseroan tercatat sebesar Rp14.026 miliar, menunjukkan peningkatan dibandingkan realisasi tahun 2024 sebesar Rp13.064 miliar. Komposisi DPK pada tahun 2025 masih didominasi oleh Deposito Berjangka, diikuti oleh Tabungan dan Giro, dengan proporsi yang relatif konsisten dibandingkan tahun sebelumnya.

In 2025, the Company's total DPK was recorded at Rp14,026 billion, representing an increase compared to the 2024 figure of Rp13,064 billion. The composition of DPK in 2025 was still dominated by Time Deposits, followed by Savings and Current Accounts, with proportions that remained relatively consistent compared to the previous year.

Dalam pengelolaan DPK, Perseroan bertujuan untuk memelihara rasio *Loan to Deposit Ratio* (LDR) yang optimal guna menjaga keseimbangan antara likuiditas dan profitabilitas. Kebutuhan DPK ditetapkan dengan mempertimbangkan strategi penyaluran kredit, sehingga pertumbuhan dana dan bisnis dapat berjalan selaras dan berkelanjutan.

In managing its DPK, the Company aims to maintain an optimal Loan-to-Deposit Ratio (LDR) to ensure a balance between liquidity and profitability. DPK requirements are determined by considering lending distribution strategies, ensuring that the growth of funds and business operations proceed in harmony and sustainably.

Dari sisi jumlah pengguna, aplikasi digital Neobank terus mencatat pertumbuhan pada tahun 2025. Pertumbuhan ini mencerminkan kepercayaan nasabah terhadap komitmen Perseroan dalam menyediakan layanan perbankan digital yang andal dan relevan, sekaligus memperkuat posisi Perseroan sebagai bank dengan layanan digital yang komprehensif di Indonesia.

In terms of user numbers, the Neobank digital app continued to grow in 2025. This growth reflects customer confidence in the Company's commitment to providing reliable and relevant digital banking services, while also strengthening the Company's position as a bank with comprehensive digital services in Indonesia.

Pertumbuhan DPK yang berkelanjutan juga menunjukkan tingkat kepercayaan masyarakat yang tinggi terhadap perbankan berbasis digital. Model layanan ini dinilai semakin relevan karena memberikan kemudahan dan efisiensi transaksi tanpa memerlukan interaksi tatap muka.

The sustainable growth of Third Party Funds also indicates a high level of public trust in digital banking. This service model is considered to be more relevant as it offers convenience and efficiency in transactions without requiring face-to-face interaction.

Segmen Tresuri

Segmen tresuri merupakan salah satu lini bisnis strategis yang mendukung stabilitas arus kas operasional Perseroan. Kegiatan ini dikelola oleh Divisi Treasury yang bertanggung jawab dalam mengelola risiko likuiditas, termasuk memastikan kepatuhan terhadap ketentuan Giro Wajib Minimum (GWM) yang ditetapkan oleh regulator atas dana yang dihimpun.

Treasury Segment

The treasury segment is one of the strategic business lines that supports the operational cash flow stability of the Company. This segment is managed by the Treasury Division, which is responsible for managing liquidity risk, including ensuring compliance with the Minimum Regulatory Reserve Requirement set by the regulator for collected funds.

Untuk mengoptimalkan pendapatan operasional, segmen tresuri melakukan pengelolaan aset melalui penempatan dana dengan mempertimbangkan struktur sumber pendanaan atau liabilitas. Penempatan dilakukan pada berbagai instrumen keuangan, seperti Sekuritas Rupiah Bank Indonesia (SRBI), obligasi, instrumen pasar uang, dan instrumen Operasi Moneter Bank Indonesia dimana komposisinya disesuaikan dengan kebutuhan likuiditas Bank, kondisi pasar, dan tingkat imbal hasil yang optimal.

To optimize operating income, the treasury segment manages assets by allocating funds based on the structure of funding sources or liabilities. Funds are allocated across various financial instruments, such as Bank Indonesia Rupiah Securities (SRBI), bonds, money market instruments, and Bank Indonesia Monetary Operations instruments, with their composition adjusted to the Bank's liquidity needs, market conditions, and optimal rates of return.

Rincian kinerja segmen tresuri tahun 2025 dan 2024 disajikan dalam tabel berikut:

Details of the treasury segment's performance in 2025 and 2024 are presented in the following table:

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Obligasi Pemerintah Government Bonds	2.084.966	18,48%	2.577.126	31,93%	(492.160)	-19,10%
Giro pada Bank Indonesia Current account with Bank Indonesia	1.144.566	10,15%	1.274.118	15,79%	(129.552)	-10,17%

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Deposits Facility Bank Indonesia - Bersih Deposits Facility with Bank Indonesia - Net	1.363.262	12,08%	155.977	1,93%	1.207.285	774,01%
Reverse Repo Bank Indonesia Reverse Repo Bank Indonesia	651.407	5,77%	1.878.331	23,27%	(1.226.924)	-65,32%
Giro pada Bank Lain Current Accounts with Other Banks	54.595	0,49%	80.789	1,00%	(26.194)	-32,42%
Obligasi Korporasi - Bersih Corporate Bonds - Net	587.887	5,21%	216.154	2,68%	371.733	171,98%
Sekuritas Rupiah Bank Indonesia Bank Indonesia Rupiah Securities	4.893.821	43,39%	1.888.672	23,40%	3.005.149	159,11%
Deposito Berjangka pada Bank Lain Time Deposits with Other Banks	129	0,00%	127	0,00%	2	1,57%
Call Money Call Money	500.000	4,43%	-	-	500.000	100,00%
Jumlah Total	11.280.633	100,00%	8.071.294	100,00%	3.209.339	39,76%

Pada tahun 2025, nilai instrumen keuangan yang dikelola pada segmen tresuri tercatat sebesar Rp11.281 miliar, meningkat dibandingkan tahun 2024 sebesar Rp8.071 miliar. Instrumen Sekuritas Rupiah Bank Indonesia (SRBI) dan Obligasi Pemerintah tetap menjadi kontributor utama, meskipun proporsinya mengalami penyesuaian dibandingkan tahun sebelumnya. Sementara itu, penempatan Giro pada Bank Indonesia tetap menjadi bagian penting dalam strategi pengelolaan likuiditas jangka pendek dan pemenuhan kepatuhan terhadap ketentuan Giro Wajib Minimum (GWM).

In 2025, the value of financial instruments managed in the treasury segment stood at Rp11,281 billion, an increase from Rp8,071 billion in 2024. Bank Indonesia Rupiah Securities (SRBI) and Government bonds remained contributors, although their share saw an adjustment compared to the previous year. Meanwhile, Placement in Bank Indonesia's Current Account remained a key component of the short-term liquidity management strategy and compliance with the Minimum Regulatory Reserve Requirement (GWM) regulation.

Dalam pengelolaan kelebihan dana jangka pendek pada tahun 2025, Perseroan tetap memanfaatkan instrumen SRBI dengan mempertimbangkan tingkat imbal hasil yang kompetitif. Selain itu, penempatan dana pada instrumen *Reverse Repo* Bank Indonesia juga terus dioptimalkan sebagai bagian dari strategi penempatan *excess fund* pada instrumen berisiko rendah dan berimbal hasil menarik.

In managing short-term excess funds in 2025, the Company continues to utilize SRBI instruments, taking into account their competitive yield levels. In addition, placements in Bank Indonesia Reverse Repo instruments continue to be optimized as part of the strategy to allocate excess funds into low-risk instruments with attractive yields.

Secara keseluruhan, tingkat imbal hasil atas instrumen utama pada segmen tresuri di tahun 2025 berada pada kisaran yang sebanding dengan tahun 2024, dengan penempatan dana yang telah disesuaikan dengan profil risiko dan kebutuhan likuiditas Perseroan selama periode berjalan.

Overall, the yield on key instruments in the treasury segment in 2025 is within a range comparable to that of 2024, with fund placements adjusted to the Company's risk profile and liquidity needs during the current period.

Segmen Operasi

Selain berdasarkan lini bisnis, Perseroan juga mengelompokkan kinerja operasional berdasarkan wilayah layanan, yaitu Jawa, Sumatera, dan Sulawesi.

Dari sisi beban operasional, wilayah Jawa pada tahun 2025 mencatat kerugian penurunan nilai aset keuangan dan non keuangan sebesar Rp1.330 miliar atau menurun sebesar Rp980 miliar dibandingkan tahun 2024 yang mengindikasikan adanya peningkatan kualitas aset terutama pada kredit konsumsi.

Selain itu, penurunan pada beban umum dan administrasi pada wilayah Jawa, Sumatera, dan Sulawesi sebesar Rp70 miliar menunjukkan upaya Bank dalam mengelola operasional secara lebih efisien.

Rincian pelaporan segmen Perseroan berdasarkan wilayah operasi untuk tahun 2025 dan 2024 disajikan dalam tabel berikut:

Operations Segment

Besides business lines, the Company also groups operational performance by service region, specifically Java, Sumatra, and Sulawesi.

In terms of operating expenses, the Java region recorded impairment losses on financial and non-financial assets of Rp1,330 billion in 2025, a decrease of Rp980 billion compared to 2024, indicating an improvement in asset quality especially on consumer loan.

Additionally, the decrease in general and administrative expenses in the Java, Sumatra, and Sulawesi regions by Rp70 billion demonstrates the Bank's efforts to manage operations more efficiently.

Details of the Company's segment reporting by operating region in 2025 and 2024 are presented in the following table:

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025			
	Jawa	Sumatera	Sulawesi	Jumlah Total
Pendapatan Bunga Interest Income	3.140.578	2.280	2.334	3.145.192
Beban Bunga Interest Expense	(762.955)	(17.570)	(11.669)	(792.194)
Pendapatan Bunga - Bersih Net Interest Income	2.377.623	(15.290)	(9.335)	2.352.998
Pendapatan Operasional Lainnya Other Operating Income	409.290	505	342	410.137
Kerugian Penurunan Nilai Aset Keuangan dan Non Keuangan Impairment Losses on Financial and Non-Financial Asset	(1.330.121)	(2.005)	(2.936)	(1.335.062)
Beban Umum dan Administrasi General and Administrative Expense	(449.647)	(2.451)	(1.187)	(453.285)
Beban Tenaga Kerja Personnel Expense	(352.339)	(1.284)	(828)	(354.451)
Beban Pemasaran Marketing Expense	(57.857)	(45)	-	(57.902)
Laba/(Rugi) Operasional Profit/(Loss) from Operations	596.949	(20.570)	(13.944)	562.435

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025			
	Jawa	Sumatera	Sulawesi	Jumlah Total
(Beban)/Pendapatan Non Operasional Non-Operating (Expense)/Income	1.653	87	-	1.740
Laba/(Rugi) Sebelum Pajak Profit/(Loss) Before Income Tax	598.602	(20.483)	(13.944)	564.175
Manfaat Pajak Tangguhan Deferred Tax Benefit	1.515	-	-	1.515
Laba/(Rugi) Bersih Net Profit/(Loss)	600.117	(20.483)	(13.944)	565.690
Jumlah Aset | Total Assets	18.524.816	288.446	160.507	18.973.769
Jumlah Liabilitas | Total Liabilities	14.285.636	292.484	164.923	14.743.043

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2024			
	Jawa	Sumatera	Sulawesi	Jumlah Total
Pendapatan Bunga Interest Income	3.605.959	2.995	3.338	3.612.292
Beban Bunga Interest Expense	(865.929)	(1.142)	(3.966)	(871.037)
Pendapatan Bunga - Bersih Net Interest Income	2.740.030	1.853	(628)	2.741.255
Pendapatan Operasional Lainnya Other Operating Income	579.509	1.152	271	580.932
Kerugian Penurunan Nilai Aset Keuangan dan Non Keuangan Impairment Losses on Financial and Non-Financial Asset	(2.310.667)	(10.079)	(2.550)	(2.323.296)
Beban Umum dan Administrasi General and Administrative Expense	(518.932)	(2.486)	(1.970)	(523.388)
Beban Provisi dan Komisi Lainnya Other Provision and Commission Expense	(6.712)	-	-	(6.712)
Beban Tenaga Kerja Personnel Expense	(353.623)	(1.632)	(1.506)	(356.761)
Beban Pemasaran Marketing Expense	(83.532)	(26)	(17)	(83.575)
Laba/(Rugi) Operasional Profit/(Loss) from Operations	46.073	(11.218)	(6.400)	28.455
(Beban)/Pendapatan Non Operasional Non-Operating (Expense)/Income	(9.791)	23	(3)	(9.771)
Laba/(Rugi) Sebelum Pajak Profit/(Loss) Before Income Tax	36.282	(11.195)	(6.403)	18.684
Manfaat Pajak Tangguhan Deferred Tax Benefit	1.201	-	-	1.201
Laba/(Rugi) Bersih Net Profit/(Loss)	37.483	(11.195)	(6.403)	19.885
Jumlah Aset Total Assets	17.351.865	6.001	51.199	17.409.065
Jumlah Liabilitas Total Liabilities	13.771.767	19.117	56.344	13.847.228

Kinerja Keuangan Komprehensif
Comprehensive Financial Performance

Analisis dan pembahasan kinerja keuangan dalam laporan ini disusun berdasarkan informasi keuangan Perseroan yang bersumber dari Laporan Keuangan PT Bank Neo Commerce Tbk per 31 Desember 2025 dan untuk tahun yang berakhir pada tanggal tersebut. Laporan keuangan disusun sesuai dengan Standar Akuntansi Keuangan yang berlaku di Indonesia.

Laporan Keuangan Perseroan telah diaudit oleh Kantor Akuntan Publik Purwanto Susanti dan Surja berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia, dengan opini audit tanpa modifikasian, sebagaimana tercantum dalam laporan auditor independen tertanggal 30 Maret 2026.

Kinerja keuangan Perseroan disajikan melalui Laporan Posisi Keuangan, Laporan Laba Rugi dan Penghasilan Komprehensif Lain, serta Laporan Arus Kas, yang diuraikan sebagai berikut.

The analysis and discussion of financial performance in this report are based on the Company's financial information derived from the Financial Statements of PT Bank Neo Commerce Tbk as of December 31, 2025, and for the year ended on that date. The financial statements were prepared in accordance with the Financial Accounting Standards applicable in Indonesia.

The Company's Financial Statements have been audited by the Public Accounting Firm Purwanto Susanti and Surja in accordance with the Auditing Standards established by the Indonesian Institute of Certified Public Accountants, with an unmodified audit opinion, as stated in the independent auditor's report dated March 30, 2026.

The Company's financial performance is presented through the Statement of Financial Position, the Statement of Income and Other Comprehensive Income, and the Statement of Cash Flows, as detailed below.

Laporan Posisi Keuangan
Statement of Financial Position

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Aset Assets	18.973.769	17.409.065	1.564.704	8,99%
Liabilitas Liabilities	14.743.043	13.847.228	895.815	6,47%
Ekuitas Equity	4.230.726	3.561.837	668.889	18,78%
Jumlah Liabilitas dan Ekuitas Total Liabilities and Equity	18.973.769	17.409.065	1.564.704	8,99%

Aset
Assets

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Kas Cash	9.760	12.133	(2.373)	-19,56%
Giro pada Bank Indonesia Current Accounts with Bank Indonesia	1.144.566	1.274.118	(129.552)	-10,17%

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Giro pada Bank Lain Current Accounts with Other Banks	54.595	80.789	(26.194)	-32,42%
Penempatan pada Bank Indonesia dan Bank Lain Placements with Bank Indonesia and Other Banks	1.863.391	156.104	1.707.287	1093,69%
Efek-efek - Bersih Marketable Securities - Net	7.566.674	4.681.952	2.884.722	61,61%
Efek-efek yang Dibeli dengan Janji Dijual Kembali Securities Purchased Under Agreements to Resell	651.407	1.878.331	(1.226.924)	-65,32%
Kredit yang Diberikan - Bersih Loans - Net	6.667.524	8.186.901	(1.519.377)	-18,56%
Aset Tetap - Bersih Fixed Assets - Net	213.573	212.416	1.157	0,54%
Aset Hak Guna - Bersih Right of Use Assets - Net	58.710	95.952	(37.242)	-38,81%
Aset Tak Berwujud - Bersih Intangible Assets - Net	151.403	134.577	16.826	12,50%
Aset Pajak Tangguhan Deferred Tax Assets	-	14.883	(14.883)	100,00%
Aset Lain-lain - Bersih Other Assets - Net	592.166	680.909	(88.743)	-13,03%
Jumlah Aset Total Assets	18.973.769	17.409.065	1.564.704	8,99%

Pada tanggal 31 Desember 2025, total aset Perseroan tercatat sebesar Rp18.974 miliar, meningkat dibandingkan posisi 31 Desember 2024 yang sebesar Rp17.409 miliar. Peningkatan aset ini terutama dipengaruhi oleh peningkatan saldo penempatan pada Bank Indonesia dan bank lain serta efek-efek – bersih. Peningkatan tersebut sebagian diimbangi oleh penurunan pada efek-efek yang dibeli dengan janji dijual kembali dan kredit yang diberikan - bersih. Peningkatan aset di 2025 sejalan dengan strategi optimalisasi pengelolaan likuiditas dan portofolio aset produktif oleh Bank.

As of December 31, 2025, the Company's total assets stood at Rp18,974 billion, an increase from the December 31, 2024, figure of Rp17,409 billion. This increase in assets was primarily driven by higher balances of deposits with Bank Indonesia and other banks, as well as securities net. This increase was partially offset by a decrease in securities purchased under resale agreements and loans granted net. The increase in assets in 2025 aligns with the Bank's strategy to optimize liquidity management and its portfolio of productive assets.

Giro pada Bank Lain

Saldo giro pada bank lain per 31 Desember 2025 tercatat sebesar Rp55 miliar, melanjutkan tren penurunan dibandingkan posisi 31 Desember 2024 sebesar Rp81 miliar sebagai langkah Bank pengelolaan likuiditas ke portofolio dengan tingkat imbal hasil yang lebih tinggi. Pada tahun 2025, giro pada bank lain mayoritas ditempatkan

Current Accounts with Other Banks

The balance of demand deposits at other banks as of December 31, 2025, stood at Rp55 billion, continuing a downward trend compared to the December 31, 2024, figure of Rp81 billion, as part of the Bank's strategy to manage liquidity by shifting funds to a portfolio with higher yields. In 2025, the majority of demand deposits at other banks

pada PT Bank Central Asia Tbk dan PT Bank Mandiri (Persero) Tbk.

Penempatan pada Bank Indonesia dan Bank Lain

Penempatan dana pada Bank Indonesia dan bank lain per 31 Desember 2025 tercatat sebesar Rp1.863 miliar, meningkat dibandingkan realisasi 2024 sebesar Rp156 miliar. Pada tahun 2025, penempatan tersebut seluruhnya berupa *Deposit Facility* pada Bank Indonesia dan Call Money.

Efek-efek Bersih

Nilai efek-efek yang dimiliki Perseroan per 31 Desember 2025 tercatat sebesar Rp7.567 miliar, meningkat dibandingkan posisi 2024 sebesar Rp4.682 miliar. Pada tahun 2025, peningkatan efek-efek terutama didorong oleh penempatan pada Sekuritas Rupiah Bank Indonesia (SRBI) yang meningkat signifikan seiring tingkat imbal hasil SRBI yang berada pada kisaran 4,58%-6,44%.

Per 31 Desember 2025, portofolio efek Perseroan terdiri dari Obligasi Pemerintah sebesar Rp2.085 miliar, Obligasi Korporasi sebesar Rp589 miliar, serta SRBI sebesar Rp4.893 miliar.

Efek-efek yang Dibeli dengan Janji Dijual Kembali

Saldo efek-efek yang dibeli dengan janji dijual kembali per 31 Desember 2025 tercatat sebesar Rp651 miliar, menurun dibandingkan posisi 2024 sebesar Rp1.878 miliar. Pada tahun 2025, saldo instrumen ini tercatat mengalami penurunan sebesar Rp1.227 miliar, menyusul strategi manajemen dalam mengelola dana Perseroan ke instrumen likuid jangka pendek dengan tingkat imbal hasil yang lebih tinggi, salah satunya Sekuritas Rupiah Bank Indonesia (SRBI).

Kredit yang Diberikan

were held at PT Bank Central Asia Tbk and PT Bank Mandiri (Persero) Tbk.

Placements with Bank Indonesia and Other Banks

Placements with Bank Indonesia and other banks as of December 31, 2025 were Rp1,863 billion, an increase compared to the 2024 figure of Rp156 billion. In 2025, these placements consisted entirely of Deposit Facilities with Bank Indonesia and Call Money.

Securities

The value of securities held by the Company as of December 31, 2025, was recorded at Rp7,567 billion, an increase compared to the 2024 figure of Rp4,682 billion. In 2025, the increase in securities was primarily driven by placements in Bank Indonesia Rupiah Securities (SRBI), which rose significantly as SRBI yields ranged from 4.58%-6.44%.

As of December 31, 2025, the Company's securities portfolio consisted of Government Bonds of Rp2,085 billion, Corporate Bonds of Rp589 billion, and SRBI of Rp4,893 billion.

Securities Purchased Under Repurchase Agreements

The balance of securities purchased under a repurchase agreement as of December 31, 2025, was recorded at Rp651 billion, a decrease compared to the 2024 figure of Rp1,878 billion. In 2025, the balance of this instrument decreased by Rp1,227 billion, following the management's strategy to allocate the Company's funds to short-term liquid instruments with higher yields, one of which is Bank Indonesia Rupiah Securities (SRBI).

Loans

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Konsumsi Consumption	5.571.758	6.208.477	(636.719)	-10,26%
Modal Kerja Working Capital	1.364.512	2.558.847	(1.194.335)	-46,67%
Pinjaman Rekening Koran Demand Loan	47.690	39.456	8.234	20,87%

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Karyawan Employees	8.572	15.172	(6.600)	-43,50%
Investasi Investment	190.048	194	189.854	97.862,89%
Sub Jumlah Sub Total	7.182.580	8.822.146	(1.639.566)	-18,58%
Dikurangi Cadangan Kerugian Penurunan Nilai Allowance for Impairment Losses	(515.056)	(635.245)	120.189	-18,92%
Jumlah Kredit yang Diberikan – Bersih Total Loans - Net	6.667.524	8.186.901	(1.519.377)	-18,56%

Kredit yang diberikan (sebelum dikurangi cadangan kerugian penurunan nilai) pada tahun 2025 tercatat sebesar Rp7.182 miliar, menurun dibandingkan realisasi tahun 2024 sebesar Rp8.822 miliar. Pada tahun 2025, penurunan kredit terutama berasal dari segmen modal kerja, terutama pada pinjaman komersial pada sektor industri pengolahan serta segmen konsumsi, khususnya pada sektor rumah tangga seperti pinjaman *channeling* Akulaku dan *direct loan.*

Loans (before allowance for impairment losses) in 2025 were recorded at Rp7,182 billion, down from the realization in 2024 of Rp8,822 billion. In 2025, the decline in credit primarily stemmed from the working capital segment, particularly commercial loans in the manufacturing sector, as well as the consumer segment, specifically in the household sector, such as channeling loans to Akulaku and direct loans.

Liabilitas

Liabilities

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Liabilitas Segera Liabilities Due Immediately	223.467	190.751	32.716	17,15%
Simpanan Nasabah Deposits from Customer	14.026.142	13.063.792	962.350	7,37%
Simpanan dari Bank Lain Deposits from Other Banks	71.891	129.079	(57.188)	-44,30%
Liabilitas Sewa Lease Liabilities	49.729	80.403	(30.674)	-38,15%
Utang Pajak Taxes Payable	18.098	15.076	3.022	20,05%
Liabilitas Imbalan Kerja Karyawan Employee Benefit Liabilities	25.030	22.540	2.490	11,05%
Liabilitas Pajak Tangguhan Deferred Tax Liabilities	12.707	-	12.707	-
Liabilitas Lain-lain Other Liabilities	315.979	345.587	(29.608)	-8,57%
Jumlah Liabilitas Total Liabilities	14.743.043	13.847.228	895.815	6,47%

Total liabilitas Perseroan per 31 Desember 2025 tercatat sebesar Rp14.743 miliar, meningkat dibandingkan posisi 2024 sebesar Rp13.847 miliar. Peningkatan ini terutama berasal dari bertambahnya simpanan nasabah.

The Company's total liabilities as of December 31, 2025, stood at Rp14,743 billion, up from Rp13,847 billion in 2024. This increase was primarily driven by a rise in customer deposits.

Simpanan Nasabah

Deposits from Customers

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Giro Curent Accounts	667.381	4,76%	514.834	3,94%	152.547	29,63%
Tabungan Savings Accounts	3.501.410	24,96%	3.095.982	23,70%	405.428	13,10%
Deposito Berjangka Time Deposit	9.847.200	70,21%	9.430.096	72,18%	417.104	4,42%
Deposito *On Call* Deposits On Call	10.151	0,07%	22.880	0,18%	(12.729)	-55,63%
Jumlah Simpanan Nasabah Total Deposits from Customers	14.026.142	100,00%	13.063.792	100,00%	962.350	7,37%

Saldo Simpanan Nasabah atau Dana Pihak Ketiga (DPK) per 31 Desember 2025 tercatat sebesar Rp14.026 miliar, melanjutkan tren peningkatan dibandingkan tahun 2024 sebesar Rp13.064 miliar. Pada tahun 2025, peningkatan DPK terutama disebabkan oleh peningkatan pada deposito berjangka sebesar Rp417 miliar atau 4,42%, tabungan sebesar Rp405 miliar atau 13,10%, serta giro sebesar Rp153 miliar atau 29,63%.

Deposits from Customers, or Third Party Funds (DPK), as of December 31, 2025, stood at Rp14,026 billion, continuing the upward trend compared to Rp13,064 billion in 2024. In 2025, the increase in DPK was primarily driven by growth in time deposits of Rp417 billion, or 4.42%; savings accounts of Rp405 billion, or 13.10%; and current accounts of Rp153 billion, or 29.63%.

Dalam pengelolaan DPK, Perseroan bertujuan untuk memelihara rasio *Loan to Deposit Ratio* (LDR) yang optimal guna memastikan keseimbangan antara likuiditas dan profitabilitas. Pengelolaan pendanaan difokuskan pada peningkatan kemampuan berbasis transaksi melalui peningkatan CASA, yang bertujuan untuk mengurangi biaya keseluruhan pendanaan serta mengembangkan basis pendanaan yang lebih stabil.

In managing DPK, the Company aims to maintain an optimal Loan to Deposit Ratio (LDR) to ensure a balance between liquidity and profitability. Funding Management is focused on enhancing transaction-based capabilities by increasing CASA, with the aim of reducing overall funding costs and developing a more stable funding base.

Ekuitas

Equity

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Modal Saham Share Capital	1.335.048	1.335.048	-	0,00%
Tambahan Modal Disetor Additional Paid in Capital	4.485.444	4.485.444	-	0,00%
Dana Setoran Modal Capital Deposit Fund	12.099	12.099	-	0,00%
Saldo Laba/(Defisit) Retained Earning/(Deficits)				
Telah Ditentukan Penggunaannya Appropriated	21.087	21.087	-	0,00%
Belum Ditentukan Penggunaannya Unappropriated	(1.729.404)	(2.296.783)	567.379	-24,70%
Komponen Ekuitas Lainnya Other Equality Component				
Keuntungan/(Kerugian) yang Belum Direalisasi atas Perubahan Nilai Wajar Efek-efek yang Diukur pada Nilai Wajar Melalui Penghasilan Komprehensif Lain – Neto Unrealized Gain/(Loss) on Changes in Fair Value of Marketable Securities Measured at Fair Value Through Other Comprehensive Income - Net of Tax	59.381	(42.255)	101.636	-240,53%
Cadangan Kerugian Penurunan Nilai atas Efek-efek yang Diukur pada Nilai Wajar Melalui Penghasilan Komprehensif Lain Allowance for Impairment Losses on Marketable Securities Measured at Fair Value Through Other Comprehensive Income	6	-	6	100,00%
Surplus Revaluasi Revaluation Surplus	47.065	47.197	(132)	-0,28%
Jumlah Ekuitas Total Equity	4.230.726	3.561.837	668.889	18,78%

Total ekuitas Perseroan per 31 Desember 2025 tercatat sebesar Rp4.231 miliar, meningkat dibandingkan posisi 2024 sebesar Rp3.562 miliar. Pada tahun 2025, kenaikan ekuitas terutama didorong oleh peningkatan laba ditahan sebesar Rp567 miliar seiring dengan laba bersih yang dibukukan di tahun berjalan. Peningkatan ekuitas juga didorong oleh keuntungan yang belum terealisasi atas nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain – setelah pajak yang meningkat sebesar Rp102 miliar.

The Company's total equity as of December 31, 2025, stood at Rp4,231 billion, an increase from the 2024 position of Rp3,562 billion. In 2025, the increase in equity was primarily driven by a rise in retained earnings of Rp567 billion, in line with the net income recorded for the current year. The increase in equity was also driven by unrealized gains on the fair value of securities measured at fair value through other comprehensive income after tax which increased by Rp102 billion.

Laporan Laba Rugi dan Penghasilan Komprehensif Lain

Statement of Profit or Loss and Other Comprehensive Income

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Pendapatan Bunga Interest Income	3.145.192	3.612.292	(467.100)	-12,93%
Beban Bunga Interest Expenses	(792.194)	(871.037)	78.843	-9,05%
Pendapatan Bunga Bersih Net Interest Income	2.352.998	2.741.255	(388.257)	-14,16%
Pendapatan Operasional Lainnya Other Operating Income	410.137	580.932	(170.795)	-29,40%
Beban Operasional Operating Expenses	(2.200.700)	(3.293.732)	1.093.032	-33,19%
Laba Operasional Profit from Operations	562.435	28.455	533.980	1.876,58%
Pendapatan/(Beban) Non-Operasional Non-Operating Income/(Expenses)	1.740	(9.771)	11.511	-117,81%
Laba Sebelum Pajak Penghasilan Profit Before Income Tax	564.175	18.684	545.491	2.919,56%
Manfaat Pajak Penghasilan Income Tax Benefit	1.515	1.201	314	26,14%
Laba Bersih Tahun Berjalan Net Profit for the Current Year	565.690	19.885	545.805	2.744,81%
Penghasilan/(Rugi) Komprehensif Lain, Bersih Setelah Pajak Other Comprehensive Income/(Loss), Net After Tax	103.067	(51.208)	154.275	-301,27%
Jumlah Penghasilan/(Rugi) Komprehensif Tahun Berjalan Total Comprehensive Income/(Loss) for the Current Year	668.757	(31.323)	700.080	-2.235,03%

Pendapatan Bunga

Pada tahun 2025, Pendapatan Bunga Perseroan tercatat sebesar Rp3.145 miliar, menurun dibandingkan realisasi 2024 sebesar Rp3.612 miliar. Pada tahun 2025, pendapatan bunga didominasi oleh kontribusi dari kredit yang diberikan sebesar 84,23% dan efek-efek sebesar 15,00% dari total pendapatan bunga. Penurunan pendapatan bunga dikarenakan berkurangnya portofolio kredit sejalan dengan upaya Perseroan yang lebih selektif dalam pencairan kredit konsumer. Sedangkan, pendapatan bunga yang berasal dari efek-efek dan efek-efek yang dibeli dengan janji dijual kembali mengalami peningkatan sebesar Rp33 miliar atau 6,04% seiring dengan strategi Perseroan dalam mengelola *excess fund* untuk meningkatkan imbal hasil.

Interest Income

In 2025, the Company's interest income stood at Rp3,145 billion, down from the realization in 2024 of Rp3,612 billion. In 2025, interest income was dominated by contributions from loans at 84.23% and securities at 15.00% of total interest income. The decline in interest income was due to a reduction in the loan portfolio, in line with the Company's efforts to be more selective in extending consumer loans. Meanwhile, interest income from securities and securities purchased under resale agreements increased by Rp33 billion, or 6.04%, in line with the Company's strategy to manage excess funds to improve returns.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Kredit yang Diberikan Loans	2.649.291	84,23%	3.145.277	87,07%	(495.986)	-15,77%
Efek-efek dan Efek-efek yang Dibeli dengan Janji Dijual Kembali Marketable Securities and Securities Purchased Under Agreements to Resell	450.134	14,31%	416.693	11,54%	33.441	88,03%
Provisi dan Komisi Kredit Loan Provision and Commissions	349	0,0	5.353	0,15%	(5.004)	-93,84%
Giro dan Penempatan pada Bank Indonesia dan Bank Lain Current Accounts and Placements with Bank Indonesia and Other Banks	45.418	1,44%	44.969	1,24%	449	1,00%
Jumlah Pendapatan Bunga Total Interest Income	3.145.192	100,00%	3.612.292	100,00%	(467.100)	-12,93%

Beban Bunga

Beban bunga Perseroan pada tahun 2025 tercatat sebesar Rp792 miliar, melanjutkan tren penurunan dibandingkan tahun 2024 sebesar Rp871 miliar. Pada tahun 2025, beban bunga didominasi oleh simpanan nasabah yang mencapai 99,36% dari total beban bunga. Penurunan beban bunga ini sejalan dengan menurunnya *cost of funds* pada deposito berjangka yang merupakan langkah strategis Perseroan dalam mencapai efisiensi operasional.

Interest Expense

The Company's interest expense in 2025 was recorded at Rp792 billion, extending the downward trend compared to Rp871 billion in 2024. In 2025, interest expense was dominated by customer deposits, which accounted for 99.36% of total interest expense. This reduction in interest expense, which aligns with the decline in cost of funds on time deposits, is a strategic move by the Company to achieve operational efficiency.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Simpanan Nasabah Deposits from Customers	787.111	99,36%	866.016	99,42%	(78.905)	-9,11%
Simpanan Bank Lain Deposits from Other Banks	4.955	0,63%	5.014	0,58%	(59)	-1,17%
Call Money Call Money	128	0,02%	-	0,00%	128	100,00%
Lainnya Others	-	0,00%	6	0,00%	(6)	-100,00%
Jumlah Beban Bunga Total Interest Expense	792.194	100,00%	871.037	100,00%	(78.842)	-9,05%

Pendapatan Bunga Bersih

Pendapatan Bunga Bersih Perseroan pada tahun 2025 tercatat sebesar Rp2.353 miliar, menurun dibandingkan capaian 2024 sebesar Rp2.741 miliar.

Pendapatan Operasional Lainnya

Pendapatan operasional lainnya pada tahun 2025 tercatat sebesar Rp410 miliar, menurun dibandingkan realisasi 2024 sebesar Rp581 miliar. Pada tahun 2025, penurunan terutama disebabkan oleh berkurangnya pendapatan dari denda keterlambatan pembayaran pinjaman sejalan dengan penurunan kredit yang diberikan dengan kualitas tidak lancar.

Beban Operasional

Beban operasional Perseroan pada tahun 2025 tercatat sebesar Rp2.201 miliar, melanjutkan tren penurunan dibandingkan tahun 2024 sebesar Rp3.294 miliar. Pada tahun 2025, penurunan beban operasional didorong oleh berkurangnya kerugian penurunan nilai pada aset keuangan, beban umum dan administrasi, dan beban pemasaran.

Laba Bersih Tahun Berjalan

Pada tahun 2025, Perseroan mencatat Laba Bersih sebesar Rp566 miliar, melanjutkan perbaikan kinerja dibandingkan tahun 2024 yang membukukan laba bersih sebesar Rp20 miliar, setelah pada tahun 2023 mencatat rugi bersih sebesar Rp573 miliar. Capaian ini mencerminkan komitmen Perseroan dalam menjaga pertumbuhan yang sehat melalui pengelolaan permodalan dan rasio keuangan yang *prudent*.

Penghasilan/(Rugi) Komprehensif Lain

Penghasilan Komprehensif Lain bersih setelah pajak pada tahun 2025 tercatat sebesar Rp103 miliar, dibandingkan dengan Rugi Komprehensif Lain sebesar Rp51 miliar pada tahun 2024. Pada tahun 2025, penghasilan komprehensif lain terutama dipengaruhi oleh kenaikan nilai wajar *(mark-to-market)* instrumen keuangan yang diklasifikasikan sebagai tersedia untuk dijual, terutama pada instrumen Sekuritas Rupiah Bank Indonesia (SRBI).

Net Interest Income

The Company's net interest income in 2025 was recorded at Rp2,353 billion, down from the achievement in 2024 of Rp2,741 billion.

Other Operating Income

Other operating income in 2025 was recorded at Rp410 billion, a decrease compared to the 2024 realization of Rp581 billion. In 2025, the decline was primarily due to a reduction in income from late payment penalties on loans in line with the decline in non-performing loans.

Operating Expenses

The Company's operating expenses in 2025 were recorded at Rp2,201 billion, continuing the downward trend compared to Rp3,294 billion in 2024. In 2025, the decrease in operating expenses was driven by a decrease in impairment losses on financial assets, general and administrative expenses, and marketing expenses.

Net Profit for the Current Year

In 2025, the Company recorded a Net Profit of Rp566 billion, continuing the improvement in performance from 2024, which posted a net income of Rp20 billion, following a net loss of Rp573 billion in 2023. This achievement reflects the Company's commitment to maintaining healthy growth through prudent capital management and financial ratios.

Other Comprehensive Income/(Loss)

Net Other Comprehensive Income after tax in 2025 was recorded at Rp103 billion, compared to an Other Comprehensive Loss of Rp51 billion in 2024. In 2025, other comprehensive income was primarily driven by increases in the fair value (mark-to-market) of financial instruments classified as available-for-sale, particularly Bank Indonesia Rupiah Securities (SRBI).

Penghasilan/(Rugi) Komprehensif Tahun Berjalan

Pada tahun 2025, Perseroan membukukan Penghasilan Komprehensif Tahun Berjalan sebesar Rp669 miliar. Jika dibandingkan dengan tahun sebelumnya, pada tahun 2024 Perseroan mencatat rugi komprehensif sebesar Rp31 miliar. Kinerja yang dibukukan Perseroan di 2025 menunjukkan perbaikan yang signifikan dibandingkan dengan kondisi tahun 2024 maupun tahun 2023 yang masih membukukan Rugi Komprehensif Tahun Berjalan sebesar Rp516 miliar.

Perbaikan kinerja tersebut terutama ditopang oleh keberhasilan Perseroan dalam mengendalikan beban operasional. Berkurangnya kebutuhan pembentukan cadangan kerugian penurunan nilai tambahan dan pengelolaan operasional yang semakin efisien menjadi faktor utama, sehingga tekanan terhadap kinerja keuangan dapat diminimalkan secara bertahap.

Comprehensive Income/(Loss) for the Current Year

In 2025, the Company recorded a Comprehensive Income for the Current Year of Rp669 billion. Compared to the previous year, in 2024 the Company recorded a comprehensive loss of Rp31 billion. The Company's performance in 2025 shows a significant improvement compared to 2024 and 2023, when it still reported a comprehensive loss for the year of Rp516 billion.

This performance improvement was primarily driven by the Company's success in controlling operating expenses. The reduced need to set aside additional impairment reserves and increasingly efficient operational management are key factors in gradually minimizing pressure on financial performance.

Laporan Arus Kas

Statement of Cash Flows

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
Arus Kas Bersih yang Diperoleh dari/(Digunakan untuk) Aktivitas Operasi Net Cash Flows Provided by/(Used in) Operating Activities	4.392.183	120.567	4.271.616	3.542,94%
Arus Kas Bersih yang (Digunakan untuk)/ Diperoleh dari Aktivitas Investasi Net Cash Flows(Used in)/Provided by Investing Activities	(2.805.455)	(1.424.434)	(1.381.021)	96,95%
Arus Kas Bersih yang (Digunakan untuk)/ Diperoleh dari Aktivitas Pendanaan Net Cash Flows (Used in)/Provided by Financing Activities	(37.560)	224.062	(261.622)	-116,76%
Kenaikan/(Penurunan) Bersih Kas dan Setara Kas Net Increase/(Decrease) in Cash and Cash Equivalents	1.549.168	(1.079.805)	2.628.973	243,47%
Kas dan Setara Kas Awal Tahun Cash and Cash Equivalents at Beginning of Year	1.523.144	2.602.949	(1.079.805)	-41,48%
Kas dan Setara Kas Akhir Tahun Cash and Cash Equivalents at End of Year	3.072.312	1.523.144	1.549.168	101,71%

Posisi kas dan setara kas Perseroan per 31 Desember 2025 tercatat sebesar Rp3.072 miliar. Sebagai pembanding, pada akhir tahun 2024 kas dan setara kas berada pada level Rp1.523 miliar, yang mencerminkan penurunan sebesar Rp1.549 miliar atau 101,71%.

The Company's cash and cash equivalents as of December 31, 2025, stood at Rp3,072 billion. By comparison, at the end of 2024, cash and cash equivalents stood at Rp1,523 billion, reflecting a decrease of Rp1,549 billion, or 101.71%.

Pada tahun 2025, arus kas bersih yang diperoleh dari aktivitas operasi mencapai Rp4.392 miliar, angka ini mengalami perbaikan dibandingkan dengan periode sebelumnya, yaitu tahun 2024, Perseroan mencatat arus kas operasi sebesar Rp121 miliar atau mengalami perbaikan. Peningkatan arus kas operasi pada 2025 terutama didukung oleh menurunnya penggunaan kas untuk aset operasi berupa efek yang dibeli dengan janji dijual kembali sebesar Rp2.499 miliar, peningkatan simpanan nasabah sebesar Rp1.770 miliar, serta berkurangnya arus kas keluar untuk pembayaran beban umum dan administrasi sebesar Rp147 miliar dan pembayaran beban bunga, provisi, dan komisi sebesar Rp68 miliar.

In 2025, net cash flows generated from operating activities amounted to Rp4,392 billion, representing a significant improvement compared to the previous period, when the Company recorded operating cash flows of Rp121 billion in 2024 or showing improvement. The increase in operating cash flows in 2025 was primarily supported by a reduction in cash outflows for operating assets in the form of securities purchased under resale agreements amounting to Rp2,499 billion, an increase in customer deposits of Rp1,770 billion, as well as lower cash outflows for general and administrative expenses amounting to Rp147 billion and interest, provision, and commission expenses amounting to Rp68 billion.

Untuk aktivitas investasi, pada tahun 2025 Perseroan membukukan arus kas yang digunakan untuk aktivitas investasi sebesar Rp2.805 miliar. Penggunaan kas untuk aktivitas investasi mengalami peningkatan dibandingkan pada tahun 2024 dimana arus kas bersih yang digunakan untuk aktivitas investasi tercatat sebesar Rp1.424 miliar. Kondisi ini terutama dipengaruhi oleh meningkatnya pengeluaran kas atas pembelian efek-efek sebesar Rp7.225 miliar, yang sebagian dikompensasi oleh peningkatan penerimaan kas dari penjualan efek-efek serta efek-efek yang jatuh tempo selama tahun 2024 sebesar Rp5.899 miliar.

For investing activities, in 2025 the Company recorded net cash outflows amounting to Rp2,805 billion. Cash used in investing activities increased compared to 2024, when net cash outflows amounted to Rp1,424 billion. This condition was primarily driven by higher cash outflows for the purchase of securities amounting to Rp7,225 billion, which were partially offset by increased cash inflows from the sale of securities and the maturity of securities during 2024 amounting to Rp5,899 billion.

Selanjutnya, arus kas bersih yang digunakan untuk aktivitas pendanaan pada tahun 2025 tercatat sebesar Rp38 miliar. Pada tahun 2024, Perseroan membukukan arus kas bersih yang diperoleh dari aktivitas pendanaan sebesar Rp224 miliar. Perubahan tersebut terutama berasal dari tambahan setoran modal yang diterima di 2024 melalui pelaksanaan Penawaran Umum Terbatas VI dan VII sebesar Rp301 miliar.

Furthermore, net cash flows used in financing activities in 2025 amounted to Rp38 billion. In contrast, in 2024 the Company recorded net cash flows generated from financing activities of Rp224 billion. This change was primarily attributable to additional capital injections received in 2024 through Limited Public Offerings VI and VII amounting to Rp301 billion.

Rasio Keuangan Penting / Key Financial Ratio

Keterangan | Description	2025	2024
Permodalan | Capital		
CAR Tier I	48,34%	34,52%
CAR Tier II	0,73%	0,78%
CAR (Credit, Operational, and Market Risk)	49,07%	35,30%
Kualitas Aset | Asset Quality		
Aset Produktif Bermasalah terhadap Total Aset Produktif Non Performing Earning Assets to Total Earning Assets	1,48%	1,89%
NPL Gross	3,58%	3,30%
NPL Net	0,89%	0,30%

Tingkat Suku Bunga

Dalam menjalankan kegiatan usaha perbankan, Perseroan secara konsisten memantau dinamika tingkat suku bunga, mengingat perubahannya dapat mempengaruhi profitabilitas dan arus kas di masa mendatang. Pergerakan suku bunga berpotensi meningkatkan marjin bunga, namun juga dapat menimbulkan risiko kerugian apabila terjadi perubahan yang tidak sesuai dengan ekspektasi.

Atas dasar tersebut, Perseroan menerapkan pengelolaan suku bunga secara prudent untuk membatasi dampak negatif yang mungkin timbul. Sebagai bentuk transparansi, Perseroan melaporkan Suku Bunga Dasar Kredit (SBDK) dalam mata uang rupiah sesuai dengan Peraturan OJK No. 37/POJK.03/2019 tentang Transparansi dan Publikasi Laporan. Adapun perkembangan tingkat suku bunga Perseroan dalam dua tahun terakhir disajikan pada tabel berikut:

Interest Rates

In conducting its banking operations, the Company consistently monitors interest rate dynamics, as changes in these rates can affect future profitability and cash flow. Interest rate movements have the potential to increase interest margins, but may also lead to losses should these changes differ from expectations.

Based on this consideration, the Company implements prudent interest rate management to limit any potential negative impacts. As a form of transparency, the Company reports the Prime Lending Rate (PLR) in Indonesian rupiah, as stipulated in OJK Regulation No. 37/POJK.03/2019 on Transparency and Report Publication. The Company's interest rate trends over the past two years are presented in the following table:

Keterangan Description	**2025**	**2024**
	Rata-rata Suku Bunga (% p.a) Avg. Interest Rate (% p.a)	**Rata-rata Suku Bunga (% p.a)** Avg. Interest Rate (% p.a)
Kredit yang Diberikan | Loans		
Kredit Korporasi | Corporate Loans	7,38	7,87
Kredit Ritel | Retail Loans	-	8,87
Kredit Mikro | Micro Loans	7,88	8,64
Kredit Konsumsi - KPR | Housing Loans	-	8,76
Kredit Konsumsi - Non KPR | Non-Housing Loans	11,77	13,34
Simpanan Nasabah | Deposits from Customers		
Giro | Current Accounts	2,26	2,00
Tabungan | Savings	0,92	1,14
Deposito Berjangka | Time Deposits		
7 Hari | 7 Days	5,08	5,09
1 Bulan | 1 Month	6,23	6,24
3 Bulan | 3 Months	6,71	6,81
6 Bulan | 6 Months	7,11	7,47
12 Bulan | 12 Months	7,82	7,93
Deposito On Call	3,50	5,34
Simpanan dari Bank Lain | Deposits from Other Bank		
Giro | Current Accounts	2,34	2,36
Deposito Berjangka | Time Deposits	5,67	6,65

Kemampuan Membayar Utang
Debt Repayment Capacity

Perseroan secara konsisten melakukan pemantauan atas kapasitasnya dalam memenuhi kewajiban keuangan, baik yang bersifat jangka pendek maupun jangka panjang. Evaluasi tersebut dilakukan melalui pemanfaatan rasio likuiditas, solvabilitas, dan rentabilitas sebagai instrumen utama. Ketiga rasio ini berfungsi sebagai tolak ukur untuk menilai kecukupan cadangan likuiditas Perseroan serta ketahanan keuangan dalam mendukung operasional dan pertumbuhan usaha secara berkelanjutan.

The Company consistently monitors its capacity to meet financial obligations, both short-term and long-term. This evaluation is conducted using liquidity, solvency, and profitability ratios as primary instruments. These three ratios serve as benchmarks to assess the adequacy of the Company's liquidity reserves and its financial resilience in supporting sustainable business operations and growth.

Rasio Likuiditas

Kemampuan Perseroan dalam memenuhi kewajiban jangka pendek diukur melalui rasio likuiditas. Tingkat likuiditas dipengaruhi oleh komposisi pendanaan, kualitas likuiditas aset, kewajiban kepada pihak ketiga, serta komitmen pembiayaan kepada debitur. Selain itu, kondisi likuiditas juga tercermin melalui dua indikator utama, yaitu Rasio Giro Wajib Minimum (GWM) dan Rasio Kredit yang Diberikan terhadap Simpanan Nasabah (*Loan to Funding Ratio/LFR*).

Liquidity Ratio

The Company's ability to meet short-term obligations is measured through liquidity ratio. Liquidity levels are influenced by the composition of funding, the quality of asset liquidity, liabilities to third parties, and financing commitments to debtors. In addition, liquidity conditions are also reflected through two key indicators: the Minimum Regulatory Reserve Requirement (GWM) and the Loan to Funding Ratio (LFR).

Keterangan Description	**2025**	**2024**
Rasio Giro Wajib Minimum (GWM)-rata rata Average Minimum Regulatory Reserve Requirement (GWM) ratio	8,62%	6,14%
Rasio Kredit yang Diberikan kepada Simpanan Nasabah (LFR) Loan to Funding Ratio (LFR)	55,62%	69,20%
Loan to Deposit Ratio (LDR)	51,21%	67,53%

Pada tahun 2025, rata-rata Rasio GWM Perseroan tercatat sebesar 8,62%, menunjukkan perubahan dibandingkan capaian tahun 2024 yang berada pada level 6,14%. Sementara itu, Rasio LFR Perseroan pada tahun 2025 tercatat sebesar 55,62%, dengan tren yang sedikit mengalami penurunan jika dibandingkan dengan realisasi tahun 2024 sebesar 69,20%.

In 2025, the Company's average GWM ratio stood at 8.62%, indicating a change from the 2024 ratio of 6.14%. Meanwhile, the Company's LFR Ratio recorded 55.62% in 2025, reflecting a slight decline compared to 69.20% in 2024.

Sepanjang periode pelaporan, Perseroan tetap mampu memenuhi ketentuan Giro Wajib Minimum (GWM) sebagaimana ditetapkan oleh Bank Indonesia, sebagai bagian dari komitmen dalam menjaga stabilitas likuiditas dan kepatuhan terhadap regulasi.

Throughout the reporting period, the Company remained capable of meeting the Minimum Regulatory Reserve Requirement (GWM) as stipulated by Bank Indonesia, as part of its commitment to maintaining liquidity stability and regulatory compliance.

Rasio Solvabilitas

Perseroan senantiasa menjaga kecukupan permodalan guna mendukung strategi pengembangan usaha saat ini maupun di masa mendatang. Struktur permodalan yang sehat juga menjadi prasyarat penting dalam memenuhi ketentuan regulator serta memastikan efisiensi penggunaan modal. Rasio solvabilitas digunakan sebagai salah satu indikator untuk menilai tingkat kesehatan Perseroan.

Dalam hal ini, Perseroan berkomitmen untuk mematuhi seluruh ketentuan permodalan yang ditetapkan regulator, khususnya yang berkaitan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

Solvency Ratio

The Company consistently maintains adequate capital to support current and future business development strategies. A sound capital structure is also a critical prerequisite in meeting regulatory requirements and ensuring efficient capital utilization. The solvency ratio serves as one of the indicators to assess the Company's financial health.

In this regard, the Company is committed to complying with all capital requirements set by regulators, particularly those related to the calculation of the Capital Adequacy Ratio (CAR) and Risk-Weighted Assets (RWA).

Keterangan Description	**2025**	**2024**
KPMM untuk Risiko Kredit CAR for Credit Risk	55,28%	38,65%
KPMM untuk Risiko Kredit dan Operasional CAR for credit risk and operational risk	49,07%	35,30%
KPMM untuk Risiko Kredit, Operasional, dan Pasar CAR for Credit, Operational, and Market Risks	49,07%	35,30%

Pada tahun 2025, KPMM untuk risiko kredit tercatat sebesar 55,28%, yang mencerminkan kenaikan dibandingkan tahun 2024 yang mencapai 38,65%. Selanjutnya, KPMM untuk risiko kredit dan operasional pada tahun 2025 tercatat sebesar 49,07%, dibandingkan realisasi tahun 2024 sebesar 35,30%.

Adapun KPMM yang mencakup risiko kredit, operasional, dan pasar pada tahun 2025 tercatat sebesar 49,07%, menunjukkan kesinambungan tren peningkatan dibandingkan capaian tahun sebelumnya sebesar 35,30%. Perkembangan tersebut sejalan dengan penguatan permodalan melalui aksi korporasi serta ekspansi usaha yang dijalankan Perseroan.

Secara keseluruhan, Perseroan terus memastikan kepatuhan penuh terhadap seluruh persyaratan permodalan regulator, termasuk ketentuan KPMM dan ATMR, sebagai bagian dari pengelolaan risiko yang pruden.

In 2025, the Capital Adequacy Ratio (CAR) for credit risk was recorded at 55.28%, reflecting an increase compared to 38.65% in 2024. Furthermore, the CAR for credit and operational risks in 2025 stood at 49.07%, compared to 35.30% in the previous year.

The CAR for credit, operational, and market risks in 2025 stood at 49.07%, indicating a continued upward trend compared to the previous year's achievement of 35.30%. This development aligns with the capital strengthening through corporate actions and business expansion implemented by the Company.

Overall, the Company continues to ensure full compliance with all capital requirements set by regulators, including the CAR and RWA provisions, as part of its prudent risk management.

Rasio Rentabilitas

Untuk menilai kemampuan menghasilkan laba dalam periode tertentu sekaligus mengukur efektivitas manajemen dalam menjalankan kegiatan usaha, Perseroan menggunakan rasio rentabilitas. Pengukuran dilakukan melalui imbal hasil atas aset (*Return on Assets/ROA*), imbal hasil atas ekuitas (*Return on Equity/ROE*), marjin bunga bersih (*Net Interest Margin/NIM*), serta rasio biaya operasional terhadap pendapatan operasional (BOPO).

Profitability Ratio

To assess the ability to generate profits over a specific period and measure management's effectiveness in conducting business operations, the Company uses profitability ratio. Measurements are conducted using return on assets (ROA), return on equity (ROE), net interest margin (NIM), and operating expenses-to-operating revenue ratio (BOPO) ratios.

Keterangan Description	**2025**	**2024**
Rasio Imbal Hasil terhadap Aset (ROA) Return on Assets (ROA) Ratio	3,11%	0,10%
Rasio Imbal Hasil terhadap Ekuitas (ROE) Return on Equity (ROE) Ratio	15,13%	0,59%
Marjin Bunga Bersih (NIM) Net Interest Margin (NIM)	14,39%	17,30%
Biaya Operasional terhadap Pendapatan Operasional (BOPO) Operating Expense to Operating Income (BOPO)	84,18%	99,34%

Hingga akhir tahun 2025, ROA dan ROE Perseroan masing-masing tercatat sebesar 3,11% dan 15,13%. Capaian ini menunjukkan tren yang berkelanjutan dibandingkan realisasi tahun 2024 yang berada pada level 0,10% untuk ROA dan 0,59% untuk ROE, serta mencerminkan pemulihan signifikan dibandingkan kondisi tahun 2024.

As of the end of 2025, the Company's Return on Assets (ROA) and Return on Equity (ROE) were recorded at 3.11% and 15.13%, respectively. This achievement reflects a sustained improvement compared to 2024, when ROA and ROE stood at 0.10% and 0.59%, respectively, and underscores a significant recovery compared to the 2024 performance.

Di sisi lain, NIM Perseroan pada tahun 2025 tercatat sebesar 14,39%, menurun sedikit jika dibandingkan dengan tahun 2024 sebesar 17,30%. Sementara itu, rasio BOPO pada tahun 2025 tercatat sebesar 84,18%, melanjutkan perbaikan efisiensi dari tahun 2024 yang berada pada level 99,34%.

Meanwhile, the Company's Net Interest Margin (NIM) was recorded at 14.39% in 2025, showing a slight decrease compared to 17.30% in 2024. In addition, the operating efficiency ratio (BOPO) improved to 84.18% in 2025, continuing the efficiency gains from 99.34% in the previous year.

Kinerja ini mencerminkan bahwa ekspansi bisnis yang dilakukan Perseroan tetap disertai dengan pengendalian biaya yang disiplin, sehingga mampu memperkuat profitabilitas secara berkelanjutan.

This performance indicates that the Company's business expansion is supported by disciplined cost control, thereby strengthening sustainable profitability.

Tingkat Kolektibilitas Piutang
Receivables Collectibility Rate

Perseroan secara berkesinambungan memantau kualitas piutang melalui analisis komposisi kredit yang diberikan berdasarkan tingkat kolektibilitas sesuai dengan ketentuan Bank Indonesia, serta melalui pengukuran rasio kredit bermasalah (*Non-Performing Loan/NPL*).

The Company continuously monitors the quality of receivables by analyzing the composition of loans based on collectibility levels in accordance with Bank Indonesia regulations, as well as by measuring the non-performing loan (NPL) ratio.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025		2024		Kenaikan (Penurunan) Increase (Decrease)	
	Saldo Balance	Komposisi (%) Composition (%)	Saldo Balance	Komposisi (%) Composition (%)	Nominal Nominal	Persentase (%) Percentage (%)
Lancar Current	6.241.128	86,89%	7.695.707	87,23%	(1.454.579)	-18,90%
Dalam Perhatian Khusus Special Mention	684.367	9,53%	835.152	9,47%	(150.785)	-18,05%
Kurang Lancar Substandard	206.088	2,87%	67.004	0,76%	139.084	207,58%
Diragukan Doubtful	19.308	0,27%	29.598	0,34%	(10.290)	-34,77%
Macet Loss	31.689	0,44%	194.685	2,21%	(162.996)	-83,72%
Jumlah Total	7.182.580	100,00%	8.822.146	100,00%	(1.639.566)	-18,58%

Keterangan Description	2025	2024
Rasio Kredit Bermasalah – Bruto (NPL - *Gross*) Non-Performing Loan-Gross	3,58%	3,30%
Rasio Kredit Bermasalah – Neto (NPL - *Net*) Non-Performing Loan-Net	0,89%	0,30%

Pada tahun 2025, kualitas kolektibilitas Kredit yang Diberikan menunjukkan perkembangan yang berkelanjutan dibandingkan tahun 2024, di mana pada tahun sebelumnya kredit dalam klasifikasi Diragukan dan Macet tercatat masing-masing sebesar Rp29,5 miliar (sekitar 0,34%) dan Rp194,6 miliar (sekitar 2,21%) dari total Kredit yang Diberikan, menjadi senilai Rp19,3 miliar (sekitar 0,27%) dan Rp31,6 miliar (sekitar 0,44%) pada tahun 2025. Komposisi tersebut telah mengalami perbaikan signifikan dibandingkan tahun 2024.

In 2025, the collectability quality of Loans showed continued improvement compared to 2024. In the previous year, loans classified as Substandard and Loss amounted to Rp29.5 billion (approximately 0.34%) and Rp194.6 billion (approximately 2.21%) of total Loans, respectively, improving to Rp19.3 billion (approximately 0.27%) and Rp31.6 billion (approximately 0.44%) in 2025. This composition reflects a significant improvement compared to 2024.

Sejalan dengan hal tersebut, rasio NPL secara gross pada tahun 2025 tercatat sebesar 3,58%, dibandingkan dengan realisasi tahun 2024 sebesar 3,30%, sementara rasio NPL secara net tercatat sebesar 0,89%, mengalami sedikit kenaikan dari 0,30% pada tahun 2024.

In line with this development, the gross Non-Performing Loan (NPL) ratio in 2025 was recorded at 3.58%, compared to 3.30% in 2024, while the net NPL ratio stood at 0.89%, slightly increasing from 0.30% in the previous year.

Perbaikan kualitas kredit ini didukung oleh berbagai langkah strategis yang dilakukan Perseroan, baik secara preventif melalui analisis pemberian kredit yang lebih komprehensif dan pemantauan kondisi usaha serta keuangan debitur secara berkala, maupun secara detektif melalui pengawasan ketat atas proses *collection* guna mencegah penurunan kualitas aset.

This improvement in loan quality is supported by various strategic measures implemented by the Company, both preventively through more comprehensive loan analysis and regular monitoring of debtor business and financial conditions, as well as detectively through strict oversight of the collection process to prevent a decline in asset quality.

Struktur Modal dan Kebijakan Manajemen Atas Struktur Modal

Capital Structure and Management Policy on Capital Structure

Perseroan menetapkan struktur permodalan dengan mengacu pada ketentuan Otoritas Jasa Keuangan serta mempertimbangkan berbagai risiko yang berpotensi timbul. Struktur modal Perseroan terdiri atas Modal Inti (*Tier 1*) dan Modal Pelengkap (*Tier 2*).

The Company establishes its capital structure in accordance with Financial Services Authority regulations and by considering various potential risks. The Company's capital structure consists of Core Capital (Tier 1) and Supplementary Capital (Tier 2).

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	**2025**	**2024**
Komponen Modal Capital Component		
Modal Inti (Tier 1) Core Capital (Tier 1)	4.027.649	3.325.430
Modal Pelengkap (Tier 2) Supplementary Capital (Tier 2)	60.756	75.603
Jumlah Total	4.088.405	3.401.033
Aset Tertimbang Menurut Risiko (ATMR) Risk-Weighted Assets (ATMR)		
Risiko Kredit Credit Risk	7.396.131	8.799.110
Risiko Operasional Operational Risk	935.868	835.188
Risiko Pasar Market Risk	-	-
Rasio Penyediaan Modal Capital Adequacy Ratio		
Dengan Risiko Kredit dan Operasional With Credit And Operational Risks	49,07%	35,30%
Dengan Risiko Kredit, Pasar dan Operasional With Credit, Market, and Operational Risks	49,07%	35,30%

Kebijakan Manajemen atas Struktur Modal

Dalam perencanaan struktur modal, Perseroan melakukan evaluasi menyeluruh berdasarkan kebutuhan permodalan yang dipersyaratkan regulator dengan tetap mempertimbangkan dinamika kondisi ekonomi. Evaluasi dan pengelolaan struktur permodalan dilakukan secara berkala untuk memastikan tersedianya modal yang memadai dalam mendukung strategi pertumbuhan usaha saat ini, menjaga keberlangsungan usaha di masa mendatang, serta memenuhi kecukupan permodalan sesuai ketentuan regulator.

Perseroan juga mengaitkan sasaran keuangan dan kecukupan modal dengan tingkat risiko yang dapat ditoleransi melalui proses perencanaan modal yang terintegrasi, termasuk penyesuaian strategi bisnis dengan kapasitas permodalan dan kebutuhan likuiditas.

Rencana Permodalan Perseroan disusun oleh Direksi berdasarkan hasil analisis yang komprehensif dan menjadi bagian dari Rencana Bisnis Bank. Rencana tersebut kemudian memperoleh persetujuan Dewan Komisaris dan diharapkan dapat memastikan ketersediaan modal yang cukup serta terbentuknya struktur permodalan yang kuat untuk menopang pertumbuhan bisnis Perseroan ke depan.

Dasar Pemilihan Struktur Modal

Peraturan Otoritas Jasa Keuangan Nomor 34/POJK.03/2016 tanggal 26 September 2016 tentang perubahan atas Peraturan OJK Nomor 11/POJK.03/2016 mengenai Kewajiban Penyediaan Modal Minimum Bank Umum menetapkan bahwa permodalan bank wajib berada pada kisaran paling rendah 9%–14% dari ATMR, disesuaikan dengan Tingkat Profil Risiko.

Dalam menentukan struktur modalnya, Perseroan menerapkan pendekatan pengelolaan modal yang selaras dengan strategi dan kebutuhan organisasi perbankan, dengan mempertimbangkan ketentuan regulasi serta kondisi ekonomi dan komersial yang berlaku. Di samping itu, Otoritas Jasa Keuangan selaku regulator senantiasa menetapkan dan melakukan pengawasan atas kecukupan modal Perseroan guna menjaga stabilitas dan kesehatan industri perbankan.

Management Policy on Capital Structure

In planning its capital structure, the Company conducts a comprehensive evaluation based on capital requirements stipulated by regulators, while taking into account the dynamics of economic conditions. The evaluation and management of the capital structure are conducted periodically to ensure the availability of adequate capital in supporting the current business growth strategy, maintaining business sustainability in the future, and meeting capital adequacy requirements as stipulated by regulators.

The Company also aligns financial targets and capital adequacy under tolerable risk levels through an integrated capital planning process, including aligning business strategies with capital capacity and liquidity needs.

The Company's Capital Plan is prepared by the Board of Directors based on comprehensive analysis and becomes part of the Bank's Business Plan. The plan is then approved by the Board of Commissioners and is expected to ensure sufficient capital availability and the establishment of a strong capital structure to support the Company's future business growth.

Capital Structure Selection Criteria

Financial Services Authority Regulation No. 34/POJK.03/2016 dated September 26, 2016, regarding amendments to OJK Regulation No. 11/POJK.03/2016 on the Minimum Capital Adequacy Requirements for Commercial Banks stipulates that a bank's capital must be within the range of at least 9%–14% of RWA, adjusted according to the Risk Profile Level.

In determining its capital structure, the Company applies a capital management approach aligned with the banking organization's strategies and needs, taking into account regulatory provisions as well as prevailing economic and commercial conditions. Furthermore, the Financial Services Authority, as the regulator, consistently establishes and monitors the Company's capital adequacy to maintain the stability and soundness of the banking industry.

Ikatan Material Untuk Investasi Barang Modal Material

Material Commitments for Capital Expenditures

Sepanjang tahun 2025, Perseroan tidak memiliki komitmen atau ikatan yang bersifat material terkait investasi barang modal yang perlu diungkapkan secara khusus dalam Laporan Keberlanjutan ini. Dengan demikian, tidak terdapat kewajiban investasi yang berpotensi menimbulkan dampak signifikan terhadap kondisi keuangan maupun operasional Perseroan.

Throughout 2025, the Company has no material commitments or obligations related to capital expenditures that require specific disclosure in this Sustainability Report. Consequently, there are no investment obligations that could potentially have a significant impact on the Company's financial or operational condition.

Realisasi Investasi Barang Modal

Realization of Capital Expenditures

Investasi barang modal (*capital expenditure*) merupakan pengeluaran dana yang dilakukan untuk memperoleh aset tetap maupun meningkatkan nilai aset yang telah dimiliki, dengan tujuan memberikan manfaat ekonomi jangka panjang. Bagi Perseroan, investasi ini memiliki peran strategis dalam mendukung kelancaran operasional serta sejalan dengan arah pengembangan dan ekspansi usaha.

Capital expenditures are expenses incurred to acquire fixed assets or enhance the value of existing assets, with the aim of providing long-term economic benefits. For the Company, these investments are strategically important in supporting operational efficiency and align with the direction of business development and expansion.

Selama tahun 2025, Perseroan tetap merealisasikan investasi barang modal guna memastikan kesiapan infrastruktur dan sarana pendukung operasional. Rincian realisasi investasi barang modal hingga akhir tahun 2025 disajikan pada tabel berikut.

Throughout 2025, the Company continued to realize capital expenditures to ensure the readiness of infrastructure and operational support facilities. Details of capital expenditure realization through the end of 2025 are presented in the following table.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal	Persentase (%) Percentage (%)
Aset tetap Fixed assets	21.857	21.034	823	4%
Bangunan Buildings	380	-	380	100%
Kendaraan Vehicles	2.152	-	2.152	100%
Peralatan dan Perabotan Kantor Office Furniture and Fixtures	934	777	157	20%

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal	Persentase (%) Percentage (%)
Mesin Kantor Office Machinery	148	-	148	100%
Komputer Computers	5.510	4.247	1.263	30%
Aset tetap dalam penyelesaian Fixed Assets In Progress	12.733	16.010	(3.277)	-20%
Aset Hak Guna Right of Use Assets	2.779	69.775	(66.996)	-96%
Bangunan Buildings	2.779	69.775	(66.996)	-96%
Aset tak berwujud Intangible Assets	30.141	5.423	24.718	100%
Piranti lunak Software	18.406	1.879	16.527	100%
Aset tak berwujud dalam penyelesaian Intangible assets in progress	11.735	3.544	8.191	100%
Jumlah Total	54.777	96.232	(41.455)	-43%

Per 31 Desember 2025, realisasi investasi barang modal Perseroan tercatat sebesar Rp54,78 miliar, mengalami penurunan sebesar Rp41,46 miliar atau 43% dibanding tahun 2024 yang sebesar Rp96,23 miliar.

As of December 31, 2025, the realization of the Company's capital goods investment amounted to Rp54.78 billion, was decreased by Rp41.46 billion or 43% compared to Rp96.23 billion in 2024.

Hal ini terutama disebabkan karena banyaknya realisasi pengadaan aset hak guna di tahun 2024 berupa sewa baru Gedung Pacific Century Place, dan perpanjangan sewa Gedung Gozco, Gedung Kantor Cabang Medan dan Data Center Colocation di Serpong dengan total nilai sebesar Rp69,78 miliar yang tidak terjadi lagi di tahun 2025.

This decrease was primarily due to the large number of right-of-use asset acquisitions in 2024, including the new lease of Pacific Century Place Building, and extension lease of Gozco Building, Medan Branch Office Building, and Data Center Colocation in Serpong, with a total value of Rp69.78 billion, which did not recur in 2025.

Di sisi lain, pada tahun 2025 terdapat peningkatan realisasi pengadaan aset tak berwujud sebesar Rp24,72 miliar dibanding pengadaan di tahun 2024. Hal ini terutama disebabkan adanya pengadaan Lisensi TDSQL sebesar Rp13,96 miliar serta adanya pengadaan aset takberwujud dalam penyelesaian untuk pengembangan sistem perbankan dengan total senilai Rp11,74 miliar.

On the other hand, in 2025 there was an increase in the realization of intangible asset procurement of Rp24.72 billion compared to procurement in 2024. This was mainly due to the procurement of TDSQL Licenses as Rp13.96 billion and the procurement of intangible assets in progress for the development of banking system with total Rp11.74 billion.

Tren investasi ini menjadi dasar evaluasi dan penyesuaian strategi belanja modal Perseroan pada tahun 2026.

This investment trend serves as the basis for the evaluation and adjustment of the Company's capital expenditure strategy in 2026.

Informasi dan Fakta Material yang Terjadi Setelah Tanggal Pelaporan

Material Information and Facts Occurring After the Reporting Date

Pada tanggal 1 Maret 2026 telah dilakukan pergantian Sekretaris Perusahaan. Sesuai dengan POJK No. 35/POJK.04/2014 dan berdasarkan Surat Keputusan Direksi No. SKEP/018/SET/BNC/II/2026, Bank telah menunjuk Heru Sulistiadhi sebagai Sekretaris Perusahaan.

On March 1, 2026, there was a change in Corporate Secretary position. In accordance with the Regulation of Financial Services Authority No. 35/POJK.04/2014 and based on Board of Directors Decree No. SKEP/018/SET/BNC/II/2026, the Bank has appointed Heru Sulistiadhi as Corporate Secretary.

Informasi Material Terkait Investasi, Ekspansi, Divestasi, Penggabungan/ Peleburan Usaha, Akuisisi, dan Restrukturisasi Utang/Modal

Material Information Regarding Investments, Expansion, Divestment, Business Merger/Consolidation, Acquisition, and Debt/Capital Restructuring

Sepanjang tahun 2025, Perseroan tidak memiliki informasi material yang berkaitan dengan aktivitas investasi, ekspansi, divestasi, penggabungan atau peleburan usaha, akuisisi, maupun restrukturisasi utang atau modal yang berdampak signifikan terhadap operasional maupun kinerja keuangan Perseroan. Oleh karena itu, tidak terdapat informasi tambahan terkait hal-hal tersebut yang perlu disajikan dalam Laporan Keberlanjutan ini.

Throughout 2025, the Company had no material information related to investment activities, expansion, divestment, business merger/consolidation, acquisition, or debt/capital restructuring that had a significant impact on the Company's operations or financial performance. Therefore, there is no additional information regarding these matters that needs to be presented in this Sustainability Report.

Kebijakan Transaksi Afiliasi dan Benturan Kepentingan

Affiliated Transaction Policy and Conflict of Interest

Kebijakan dan Mekanisme Penelaahan Transaksi serta Kepatuhan terhadap Ketentuan

Perseroan telah memiliki kebijakan yang mengatur transaksi afiliasi dan potensi benturan kepentingan sebagaimana ditetapkan dalam Surat Keputusan Direksi Nomor SKEP/008/SET/BNC/I/2024 tanggal 25 Januari 2024. Seluruh transaksi dengan pihak afiliasi dilaksanakan dengan menjunjung tinggi prinsip kehati-hatian dan praktik bisnis yang berlaku umum, serta telah memenuhi ketentuan Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.04/2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan, serta PSAK 224 (revisi 2015) tentang Pengungkapan Pihak-pihak Berelasi.

Dalam setiap proses pembahasan dan pengambilan keputusan yang berpotensi mengandung benturan kepentingan, Perseroan menerapkan ketentuan sebagai berikut:

1. Pihak yang memiliki benturan kepentingan tidak diperkenankan terlibat dalam pembahasan maupun pengambilan keputusan. Keputusan akan diambil oleh pejabat lain atau pejabat satu tingkat di atasnya.
2. Pemegang saham yang memiliki benturan kepentingan wajib mengikuti keputusan yang ditetapkan oleh pemegang saham yang tidak memiliki benturan kepentingan dalam Rapat Umum Pemegang Saham (RUPS).
3. Setiap anggota Dewan Komisaris, Direksi, serta karyawan yang memiliki kewenangan pengambilan keputusan diwajibkan menyampaikan pernyataan tahunan mengenai tidak adanya benturan kepentingan serta kepatuhan terhadap kode etik perusahaan.
4. Setiap keputusan yang mengandung benturan kepentingan wajib dicatat dalam risalah rapat dan dilaporkan kepada Direktur Kepatuhan sebagai bagian dari laporan pelaksanaan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance*).

Policies and Mechanisms on Transaction Review and Compliance with Regulations

The Company has a policy governing affiliated transactions and potential conflicts of interest as stipulated in Board of Directors' Decision No. SKEP/008/SET/BNC/I/2024 dated January 25, 2024. All transactions with affiliated parties are conducted in accordance with the principles of prudence and generally accepted business practices, and have complied with the provisions of Financial Services Authority Regulation No. 42/POJK.04/2020 regarding Affiliated Transactions and Conflict of Interest Transactions, as well as PSAK 224 (revised 2015) regarding Disclosure of Related Parties.

In any discussion or decision-making process that potentially involves a conflict of interest, the Company applies the following provisions:

1. Parties with a conflict of interest are not permitted to participate in discussions or decision-making. Decisions will be made by another officer or an officer one level above them.
2. Shareholders with a conflict of interest are required to comply with decisions made by shareholders without a conflict of interest during the General Meeting of Shareholders (GMS).
3. Every member of the Board of Commissioners, the Board of Directors, and employees with decision-making authority is required to submit an annual statement regarding their absence of conflicts of interest and their compliance with the Company's code of conduct.
4. Any decision involving a conflict of interest must be recorded in the meeting minutes and reported to the Director of Compliance as part of the report on the implementation of Good Corporate Governance.

Dalam implementasinya, Direksi memastikan seluruh transaksi afiliasi telah melalui proses penelaahan yang memadai dan dilaksanakan sesuai dengan prinsip kewajaran (*arm's length principle*). Dewan Komisaris dan Komite Audit juga secara berkala melakukan evaluasi untuk memastikan bahwa transaksi tersebut selaras dengan praktik bisnis yang sehat dan memenuhi prinsip kewajaran.

Transaksi Material yang Mengandung Benturan Kepentingan dan Transaksi dengan Pihak Afiliasi/Pihak Berelasi

Sepanjang tahun 2025, Perseroan melaksanakan Transaksi Afiliasi yang telah memenuhi ketentuan Peraturan Otoritas Jasa Keuangan Nomor 42/POJK.04/2020 tentang Transaksi Afiliasi dan Transaksi Benturan Kepentingan. Perseroan tidak menemukan adanya pelanggaran terhadap peraturan perundang-undangan yang berlaku terkait transaksi dengan pihak berelasi, serta mampu memitigasi potensi benturan kepentingan melalui kebijakan internal yang diterapkan secara konsisten.

Transaksi atas kerja sama dengan pihak terafiliasi atau berelasi telah diungkapkan dalam Catatan atas Laporan Keuangan Tahunan Perseroan. Seluruh transaksi tersebut merupakan bagian dari kegiatan usaha Perseroan dalam rangka menghasilkan pendapatan dan dilakukan secara rutin, berulang, dan/atau berkelanjutan.

Nama, Sifat Hubungan, dan Sifat Transaksi Berelasi

Informasi mengenai nama pihak berelasi, karakteristik hubungan, serta jenis transaksi yang dilakukan oleh Perseroan disajikan secara transparan pada tabel berikut. Pengungkapan ini bertujuan untuk memberikan gambaran yang utuh mengenai hubungan afiliasi yang dimiliki Perseroan sesuai dengan ketentuan pelaporan yang berlaku.

In its implementation, the Board of Directors ensures that all affiliated transactions have been reviewed adequately and conducted in accordance with the arm's length principle. The Board of Commissioners and the Audit Committee also periodically evaluate these transactions to ensure they align with sound business practices and meet the arm's length principle.

Material Transactions Involving Conflicts of Interest and Affiliated/ Related Party Transactions

Throughout 2025, the Company conducted Affiliated Transactions that complied with the provisions of Financial Services Authority Regulation No. 42/POJK.04/2020 on Affiliated Transactions and Conflict of Interest Transactions. The Company did not identify any violations of applicable laws and regulations regarding transactions with related parties and was able to mitigate potential conflicts of interest through internal policies implemented consistently.

Transactions with affiliated or related parties have been disclosed in the Notes to the Company's Annual Financial Statements. All of these transactions are part of the Company's business activities aimed at generating revenue and are conducted on a routine, recurring, and/or ongoing basis.

Name, Nature of Relationship, and Nature of Affiliated Transactions

Information regarding the names of related parties, the nature of the relationships, and the types of transactions conducted by the Company is presented transparently in the following table. This disclosure aims to provide a comprehensive overview of the Company's affiliated relationships in accordance with applicable reporting requirements.

Pihak Berelasi Related Parties	Sifat Hubungan Berelasi Nature of Relationship Parties	Sifat Transaksi Nature Transaction
PT Akulaku Silvrr Indonesia (ASI)	Pemegang saham Shareholder	• Aset lain-lain • Simpanan nasabah • Liabilitas lain-lain • Pendapatan bunga - amortisasi biaya transaksi • Beban provisi dan komisi lainnya • Other assets • Deposits from customers • Other liabilities • Interest income - amortization of transaction cost • Other provision and commission expenses
PT Gozco Capital	Pemegang saham Shareholder	Simpanan nasabah Deposits from customers
PT Akulaku Finance Indonesia (AFI)	Dimiliki oleh pemegang saham akhir yang sama Owned by the same ultimate shareholders	• Simpanan nasabah • Aset lain-lain • Deposits from customers • Other assets
PT Inovasi Kredit Indonesia	Dimiliki oleh pemegang saham akhir yang sama Owned by the same ultimate shareholders	Simpanan nasabah Deposits from customers
PT Pintar Inovasi Digital (PID)	Dimiliki oleh pemegang saham akhir yang sama Owned by the same ultimate shareholders	Simpanan nasabah Deposits from customers
PT Pintar Platform Digital	Dimiliki oleh pemegang saham akhir yang sama Owned by the same ultimate shareholders	Simpanan nasabah Deposits from customers
PT Solusi Digital Abadi	Dimiliki oleh pemegang saham akhir yang sama Owned by the same ultimate shareholders	• Liabilitas segera • Liabilities due immediately
Dewan Komisaris dan Direksi Board of Commissioners and Directors	Manajemen kunci Key management	• Kredit yang diberikan • Simpanan nasabah • Kompensasi dan remunerasi • Loans • Deposits from customers • Compensation and remuneration
Pejabat Bank Bank Key Employees	Manajemen kunci Key management	• Kredit yang diberikan • Simpanan nasabah • Kompensasi dan remunerasi • Loans • Deposits from customers • Compensation and remuneration

Realisasi Transaksi Pihak Berelasi

Dalam menjalankan transaksi dengan pihak berelasi, Perseroan secara konsisten menerapkan prinsip kewajaran transaksi (*arm's length principle*) serta memastikan kepatuhan terhadap seluruh peraturan perundang-undangan yang mengatur transaksi afiliasi dan potensi benturan kepentingan. Setiap transaksi dilakukan melalui mekanisme pengendalian internal yang memadai guna menjaga integritas dan kepentingan seluruh pemangku kepentingan.

Affiliated Transactions

In conducting transactions with related parties, the Company consistently applies the arm's length principle and ensures compliance with all laws and regulations governing affiliate transactions and potential conflicts of interest. Every transaction is conducted through adequate internal control mechanisms to safeguard the integrity and interests of all stakeholders.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024
Kredit yang diberikan Loans		
Dewan Komisaris dan Direksi Board of Commissioners and Directors	19.802	19.823
Pejabat Bank Bank key employees	2.228	2.801
Sub jumlah Sub total	22.030	22.624
Persentase terhadap jumlah kredit yang diberikan – bruto Percentage to total loans - gross	0,31%	0,26%
Aset lain-lain Other assets		
PT Akulaku Silvrr Indonesia	5.815	4.922
PT Akulaku Finance Indonesia	716	-
Sub jumlah Sub total	6.531	4.922
Persentase terhadap jumlah aset lain-lain – bruto Percentage to total other assets - gross	1,10%	0,72%
Liabilitas segera Liabilities due immediately		
PT Solusi Digital Abadi	280	677
Sub jumlah Sub total	280	677
Persentase terhadap jumlah liabilitas segera Percentage to total liabilities due immediately	0,13%	0,35%
Simpanan nasabah Deposits from customers		
Pemegang saham Shareholders	80.034	8.210
Dimiliki oleh pemegang saham akhir yang sama Owned by the same ultimate shareholders	33.141	40.739
Dewan Komisaris dan Direksi Board of Commissioners and Directors	58.973	12.232
Pejabat Bank Bank Key Employees	7.994	7.550
Sub jumlah Sub total	180.142	68.731
Persentase terhadap jumlah simpanan nasabah Percentage to total deposits from customers	1,28%	0,53%
Liabilitas lain-lain Other liabilities		
PT Akulaku Silvrr Indonesia	35.687	45.697
Sub jumlah Sub total	35.687	45.697
Persentase terhadap jumlah liabilitas lain-lain Percentage to total other liabilities	11,29%	13,22%

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025	2024
Pendapatan bunga – Amortisasi biaya transaksi Interest income – Amortization of transaction costs		
PT Akulaku Silvrr Indonesia	(538.550)	(1.113.607)
Sub jumlah Sub total	(538.550)	(1.113.607)
Persentase terhadap jumlah pendapatan bunga Percentage to total interest income	17,12%	30,83%
Beban provisi dan komisi lainnya Other provision and commission expenses		
PT Akulaku Silvrr Indonesia	-	6.712
Sub Jumlah Sub Total	-	6.712
Persentase terhadap jumlah beban operasional Percentage to total operating expenses	0,00%	0,20%
Kompensasi Manajemen Kunci Compensation of Key Management Personnel		
Gaji dan Imbalan Jangka Pendek: Salaries and Short-Term Benefits:		
Dewan Komisaris Board of Commissioners	3.380	3.240
Direksi Board of Directors	8.143	8.218
Pejabat Bank Bank Key Employees	25.971	22.842
Sub jumlah Sub total	37.494	34.300
Persentase terhadap Jumlah Beban Tenaga Kerja Percentage to Total Personnel Expenses	10,58%	9,61%

Kebijakan dan Pembagian Dividen
Dividend Policy and Distribution

Kebijakan Pembagian Dividen

Kebijakan pembagian dividen Perseroan ditetapkan melalui keputusan Rapat Umum Pemegang Saham (RUPS) dan dilaksanakan dengan mengacu pada Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas. Dalam menetapkan kebijakan tersebut, Perseroan senantiasa memperhatikan hak-hak pemegang saham dengan tetap mempertimbangkan berbagai faktor, antara lain tingkat kesehatan Perseroan, kecukupan permodalan, kebutuhan pendanaan untuk ekspansi usaha, serta prospek pertumbuhan usaha ke depan. Kebijakan ini tidak mengurangi kewenangan RUPS untuk menetapkan keputusan lain sesuai dengan Anggaran Dasar Perseroan.

Dividend Distribution Policy

The Company's dividend distribution policy is established through a resolution of the General Meeting of Shareholders (GMS) and implemented in accordance with Law No. 40 of 2007 on Limited Liability Companies. In establishing this policy, the Company consistently prioritizes the rights of shareholders while taking into account various factors, including the Company's financial health, capital adequacy, funding needs for business expansion, and future business growth prospects. This policy does not limit the authority of the GMS to make other decisions in accordance with the Company's Articles of Association.

Kronologis Pembagian Dividen

Sehubungan dengan pembagian dividen, Perseroan tidak memiliki pembatasan (*negative covenants*) dari pihak ketiga yang berpotensi merugikan pemegang saham. Seluruh proses pembagian dividen dilaksanakan dengan mematuhi ketentuan yang berlaku di Negara Republik Indonesia, khususnya di bidang Pasar Modal.

Berdasarkan Keputusan RUPS yang diselenggarakan pada 27 Mei 2025, pemegang saham menyetujui bahwa Perseroan tidak melakukan pembagian dividen untuk tahun buku 2024. Riwayat pembagian dividen Perseroan dalam lima tahun terakhir disajikan pada tabel berikut.

Chronology of Dividend Distribution

Regarding dividend distribution, the Company has no restrictions (negative covenants) from third parties that could potentially harm shareholders. The entire dividend distribution process is conducted in compliance with applicable regulations in the Republic of Indonesia, particularly in the capital market sector.

Based on the GMS resolution held on May 27, 2025, shareholders approved that the Company would not distribute dividends for the 2024 fiscal year. The Company's dividend distribution history over the past five years is presented in the following table.

Tanggal RUPS Date of GMS	**Tanggal Pencatatan** Listing Date	**Tanggal Pembayaran** Payment Date	**Tahun Buku** Financial Year	**Rasio Dividen** Dividend Ratio	**Nominal Dividen (Rp juta)** Dividend Nominal (million Rupiah)	**Dividen Per Saham** Dividend per Share
27-05-2025	-	-	2024	-	-	-
30-04-2024	-	-	2023	-	-	-
28-06-2023	-	-	2022	-	-	-
21-07-2022	-	-	2021	-	-	-
31-03-2021	13-04-2021	03-05-2021	2020	10%	1.532,21	0,23
30-07-2020	12-08-2020	03-09-2020	2019	10%	1.598,83	0,24

Realisasi Penggunaan Dana Hasil Penawaran Umum

Realization of the Use of Public Offering Proceeds

Perseroan telah menyampaikan laporan Realisasi Penggunaan Dana Hasil Penawaran Umum sesuai dengan ketentuan POJK Nomor 30/POJK.04/2015 tentang Laporan Realisasi Penggunaan Dana Hasil Penawaran Umum, dengan rincian sebagai berikut:

1. Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) V

Dalam pelaksanaan PMHMETD V, Perseroan menerbitkan sebanyak 1.927.162.193 lembar saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp1.300 per saham. Seluruh saham yang diterbitkan terserap sepenuhnya, sehingga Perseroan memperoleh dana sebesar Rp2.505,31 miliar. Terdapat perubahan penggunaan dana yang telah disetujui dalam RUPS tanggal 27 Mei 2025 sehingga realisasi penggunaan dana PMHMETD V hingga 31 Desember 2025 disajikan pada tabel berikut.

No	Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Results		
			Jumlah Hasil Penawaran Umum Total Proceeds of Public Offering	Biaya Penawaran Umum Public Offering Fee	Hasil Bersih Net Proceeds
1	Penawaran Umum Dengan Efek Terlebih Dahulu V Public Offering with Pre-emptive Rights V	18-Nov-21	2.505.310.850.900	2.541.062.000	2.502.769.788.900
	Jumlah Total		2.505.310.850.900	2.541.062.000	2.502.769.788.900

2. Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) VI

Pada PMHMETD VI, Perseroan menerbitkan 2.617.133.843 lembar saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp650 per saham. Seluruh saham tersebut terserap secara penuh dengan total dana yang diterima Perseroan sebesar Rp1.701,14 miliar. Terdapat perubahan penggunaan dana yang telah disetujui dalam RUPS tanggal 27 Mei 2025 sehingga realisasi penggunaan dana hingga akhir tahun 2025 disajikan pada tabel berikut.

No	Jenis Penawaran Umum Type of Public Offering	Tanggal Efektif Effective Date	Nilai Realisasi Hasil Penawaran Umum Realized Value of Public Offering Results			Rencana Penggunaan Dana Menurut Prospektus Fund Usage Plan According to Prospect	
			Jumlah Hasil Penawaran Umum Total Proceeds of Public Offering	Biaya Penawaran Umum Public Offering Fee	Hasil Bersih Net Proceeds	Ekspansi Kredit Loan Expansion	Operasional Perbankan Banking Operational Activities
1	Penawaran Umum Dengan Hak memesan Efek Terlebih Dahulu VI Public Offering with Pre-emptive Rights VI	10-Nov-22	1.701.136.997.950	10.962.948.340	1.690.174.049.610	1.014.104.429.766	676.069.619.844
Jumlah Total			1.701.136.997.950	10.962.948.340	1.690.174.049.610	1.014.104.429.766	676.069.619.844

The Company has submitted a report on the Use of Public Offering Proceeds in accordance with the provisions of POJK No. 30/POJK.04/2015 regarding Reports on the Use of Public Offering Proceeds, with the following details:

1. Capital Increase with Preemptive Rights (PMHMETD) V

In the implementation of PMHMETD V, the Company issued 1,927,162,193 new shares with a par value of Rp100 per share and an exercise price of Rp1,300 per share. All issued shares were fully subscribed, enabling the Company to raise a total of Rp2,505.31 billion. There were changes to the use of funds approved at the GMS on May 27, 2025; therefore, the actual use of funds from PMHMETD V as of December 31, 2025, is presented in the following table.

Rencana Penggunaan Dana Menurut Prospektus Fund Usage Plan According to Prospect		
Penyaluran Kredit Lending	**Kegiatan Operasional Perbankan** Banking Operational Activities	**Pengembangan Teknologi Informasi** Information Technology Development
444.794.496.072	1.001.107.915.560	681.451.908.933
444.794.496.072	1.001.107.915.560	681.451.908.933

2. Capital Increase with Preemptive Rights (PMHMETD) VI

In PMHMETD VI, the Company issued 2,617,133,843 new shares with a par value of Rp100 per share and an exercise price of Rp650 per share. All of these shares were fully subscribed, with the Company receiving a total of Rp1,701.14 billion. There were changes to the use of funds approved at the GNS on May 27, 2025, resulting in the realization of fund usage through the end of 2025 as presented in the following table.

Realisasi Penggunaan Dana Actual Use of Funds						**Sisa Dana Hasil Penawaran Umum** Remaining Funds from Public Offering
Pengembangan Teknologi Informasi Information Technology Development	**Total**	**Ekspansi Kredit** Loan Expansion	**Kegiatan Operasional Perbankan** Banking Operational Activities	**Pengembangan Teknologi Informasi** Information Technology Development	**Total**	
338.034.809.922	1.690.174.049.610	1.014.104.429.766	676.069.619.844	-	1.690.174.049.610	-
338.034.809.922	1.690.174.049.610	1.014.104.429.766	676.069.619.844	-	1.690.174.049.610	-

3. Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) VII

Melalui PMHMETD VII, Perseroan menerbitkan 1.311.666.667 saham baru dengan nilai nominal Rp100 per saham dan harga pelaksanaan Rp300 per saham. Seluruh penerbitan saham terserap sepenuhnya dengan dana yang dihimpun sebesar Rp393.500.000.100. Seluruh dana hasil PUT VII telah direalisasikan sesuai dengan rencana penggunaan dana dan telah dilaporkan kepada publik melalui surat Perseroan No. 012/SET/DIR/BNC/I/2025 tanggal 15 Januari 2025. Laporan pertanggungjawaban atas realisasi penggunaan dana tersebut juga telah disampaikan dalam RUPS Tahunan yang diselenggarakan pada tanggal 27 Mei 2025.

3. Capital Increase with Preemptive Rights (PMHMETD) VII

Through PMHMETD VII, the Company issued 1,311,666,667 new shares with a par value of Rp100 per share and an exercise price of Rp300 per share. All issued shares were fully subscribed, raising a total of Rp393,500,000,100. All proceeds from PUT VII have been utilized in accordance with the planned use of funds and have been disclosed to the public via the Company's letter No. 012/SET/DIR/BNC/I/2025 dated January 15, 2025. A report on the accountability for the realization of the use of these funds was also presented at the Annual GMS held on May 27, 2025.

No	**Jenis Penawaran** Umum Type of Public Offering	**Tanggal Efektif** Effective Date	**Nilai Realisasi Hasil Penawaran Umum** Realized Value of Public Offering Results		
			Jumlah Hasil Penawaran Umum Total Proceeds of Public Offering	**Biaya Penawaran Umum** Public Offering Fee	**Hasil Bersih** Net Proceeds
1	Penawaran Umum Dengan Hak memesan Efek Terlebih Dahulu VII Public Offering with Pre-emptive Rights VII	28-Jun-24	393.500.000.100	30.794.038.158	362.705.961.942
Jumlah Total			393.500.000.100	30.794.038.158	362.705.961.942

Rencana Penggunaan Dana Menurut Prospektus Fund Usage Plan According to Prospect		**Realisasi Penggunaan Dana** Actual Use of Funds		**Sisa Dana Hasil Penawaran Umum** Remaining Funds from Public Offering
Peningkatan Kredit Credit Enhancement	**Total**	**Peningkatan Kredit** Credit Enhancement	**Total**	
362.705.961.942	362.705.961.942	362.705.961.942	362.705.961.942	-
362.705.961.942	362.705.961.942	362.705.961.942	362.705.961.942	-

Kontribusi Terhadap Negara

Contribution to the Nation

Sebagai bentuk tanggung jawab dan kepatuhan terhadap peraturan yang berlaku, Perseroan berkomitmen untuk memenuhi seluruh kewajiban perpajakan secara tepat waktu dan sesuai ketentuan. Kontribusi pajak Perseroan selama dua tahun terakhir disajikan pada tabel berikut.

As part of its responsibility and compliance with applicable regulations, the Company is committed to complying with all tax regulations on time and in accordance with the provisions. The Company's tax contributions over the pas two years are presented in the following table.

dalam jutaan Rupiah | in million Rupiah

Uraian Descriptions	2025	2024	Kenaikan (Penurunan) Increase (Decrease)	
			Nominal Nominal	Persentase (%) Percentage (%)
PPh 21 Income Tax 21	47.674	42.826	4.848	11,32%
PPh 23 Income Tax 23	11.707	25.174	(13.467)	-53,49%
PPh 26 Income Tax 26	137	214	(78)	-36,30%
PPh 4 (2) Income Tax 4(2)	154.596	168.584	(13.988)	-8,30%
PPN VAT	6.255	6.463	(208)	-3,21%
Jumlah Pajak Total Tax	220.369	243.261	(22.893)	-9,41%

Informasi Tentang Program Kepemilikan Saham oleh Karyawan dan/atau Manajemen (ESOP/MSOP)

Information Regarding Employee and/or Management Stock Ownership Program (ESOP/MSOP)

Sepanjang tahun 2025, Perseroan tidak menyelenggarakan program kepemilikan saham oleh karyawan (*Employee Stock Ownership Program/ESOP*) dan/atau manajemen (*Management Stock Ownership Program/MSOP*). Dengan demikian, tidak terdapat informasi terkait ESOP/MSOP yang perlu diungkapkan dalam Laporan ini.

Throughout 2025, the Company did not implement an employee stock ownership program (Employee Stock Ownership Program/ESOP) and/or a management stock ownership program (Management Stock Ownership Program/MSOP). Consequently, there is no information regarding ESOP/MSOP that needs to be disclosed in this Report.

Perbandingan Antara Target Dengan Realisasi Kinerja

Comparison of Performance Targets and Realization

Dalam rangka mencapai tujuan strategis yang telah ditetapkan, Perseroan menyusun berbagai target kinerja yang tercantum dalam Rencana Bisnis Bank (RBB) dengan mempertimbangkan dinamika kondisi sepanjang tahun berjalan. Perseroan secara berkelanjutan menerapkan berbagai strategi untuk menjaga stabilitas operasional dan mendorong pertumbuhan usaha. Perbandingan antara target dan realisasi kinerja disajikan pada tabel berikut.

To achieve its established strategic objectives, the Company sets various performance targets outlined in the Bank's Business Plan (RBB), taking into account the dynamics throughout the current year. The Company continuously implements various strategies to maintain operational stability and drive business growth. A comparison of performance targets and realization is presented in the following table.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2025			
	Target Target	Realisasi Realization	Δ Rp	(%)
Kredit yang Diberikan Loans	8.474.732	7.182.580	(1.292.152)	84,75%
Dana Pihak Ketiga Third Party Fund	13.600.000	14.026.142	426.142	103,13%
Ekuitas Equity	3.845.698	4.230.726	385.028	110,01%
Modal Disetor Paid-in Capital	1.335.048	1.335.048	-	100,00%
Jumlah Aset Total Assets	18.022.943	18.973.769	950.826	105,28%
Pendapatan Bunga Bersih Net Interest Income	2.248.978	2.352.996	104.018	104,63%
Laba/(Rugi) Tahun Berjalan (Sebelum Pajak) Profit/(Loss) for the Current Year (Before Tax)	238.302	564.175	325.873	236,75%
Rasio Keuangan Financial Ratio				
KPMM/CAR	39,44%	49,07%		
ROE	6,54%	15,13%		
ROA	1,33%	3,11%		
NIM	14,14%	14,39%		
BOPO	93,14%	84,18%		
LDR	62,31%	51,21%		

Upaya Merealisasikan Target yang Ditetapkan

Untuk memastikan pencapaian target-target tersebut, Perseroan telah menetapkan dan mengimplementasikan berbagai strategi pendukung pertumbuhan usaha, antara lain:

1. Melanjutkan transformasi digital dengan fokus pada peningkatan pengalaman nasabah serta efisiensi proses internal.
2. Mengembangkan ekosistem layanan perbankan digital yang terintegrasi, dengan penekanan pada peningkatan layanan bagi segmen ritel dan korporasi sesuai klasifikasi Kelompok Usaha Bank.
3. Meningkatkan kualitas pengelolaan dan pengamanan Teknologi Informasi secara berkelanjutan, sejalan dengan ketentuan keamanan siber, Undang-Undang Perlindungan Data Pribadi, serta standar global yang berlaku.
4. Memperkuat posisi Perseroan sebagai institusi keuangan digital yang andal dan terpercaya dengan mengoptimalkan pemanfaatan teknologi dalam pengembangan bisnis dan layanan secara nasional.
5. Menyempurnakan mekanisme operasional dan pengelolaan jaringan kantor agar lebih efektif dan efisien dalam mendukung transformasi menuju bank berbasis layanan digital serta peningkatan kualitas layanan kepada nasabah.
6. Mengembangkan layanan berbasis teknologi maupun layanan konvensional melalui kantor cabang, sebagai sarana peningkatan mutu pelayanan dan penyampaian informasi transformasi Perseroan, termasuk pengembangan layanan *branchless banking* yang menjangkau kota-kota besar di Indonesia.
7. Melakukan penyesuaian struktur organisasi beserta seluruh aspek pendukungnya agar selaras dengan budaya kerja dan strategi baru dalam rangka mewujudkan visi Perseroan.

Efforts to Achieve Targets

To ensure the achievement of targets, the Company has established and implemented various strategies to support business growth, including:

1. Continue the digital transformation with a focus on enhancing the customer experience and improving internal process efficiency.
2. Develop an integrated digital banking service ecosystem, with an emphasis on improving services for the retail and corporate segments in accordance with the Bank's Business Group classification.
3. Continuously improve the quality of information technology management and security, in line with cybersecurity regulations, the Personal Data Protection Act, and applicable global standards.
4. Strengthen the Company's position as a reliable and trusted digital financial institution by optimizing the use of technology in business and service development nationwide.
5. Refine operational mechanisms and branch network management to be more effective and efficient in supporting the transformation toward a digital-service-based bank and improving service quality for customers.
6. Develop technology-based services as well as conventional services through branch offices, as a means to improve service quality and communicate the Company's transformation, including the development of branchless banking services reaching major cities in Indonesia.
7. Adjust the organizational structure along with all supporting aspects to align with the new work culture and strategy in order to realize the Company's vision.

Proyeksi Tahun 2026
2026 Projections

Perseroan telah menyusun proyeksi kinerja untuk tahun 2026 dengan mempertimbangkan dinamika perekonomian terkini serta proyeksi ekonomi tahun 2026, baik dari perspektif makro maupun mikro. Proyeksi tersebut menjadi dasar dalam penetapan arah strategis Perseroan ke depan.

The Company has prepared performance projections for 2026 by considering current economic dynamics as well as economic projections for 2026, from both macro and micro perspectives. These projections serve as a foundation in determining the Company's future strategic direction.

dalam jutaan Rupiah | in million Rupiah

Keterangan Description	2024	2025	2026
	Realisasi Realization	Realisasi Realization	Target Pertumbuhan (%) Growth Target (%)
Kredit yang diberikan Loans	8.822.146	7.182.580	5-15%
Dana Pihak Ketiga Third Party Fund	13.063.792	14.026.142	3-5%
Ekuitas Equity	3.561.837	4.230.726	8 -10%
Modal Disetor Paid-in Capital	1.335.048	1.335.048	-
Jumlah Aset Total Assets	17.409.065	18.973.769	3-5%
Pendapatan Bunga Bersih Net Interest Income	2.850.561	2.352.996	8 -10%
Laba/(Rugi) Tahun Berjalan (Sebelum Pajak) Profit/(Loss) for the Current Year (Before Tax)	18.684	564.175	3-5%
Rasio Keuangan Financial Ratio			
KPMM/CAR	35,30%	49,07%	46,66%
ROE	0,59%	15,13%	9,34%
ROA	0,10%	3,11%	2,33%
NIM	17,30%	14,39%	16,96%
BOPO	99,34%	84,18%	89,28%
LDR	67,53%	51,21%	68,56%

Selain proyeksi keuangan, Perseroan juga menetapkan sasaran strategis jangka pendek, jangka menengah, dan jangka panjang dengan mempertimbangkan kondisi keuangan dan non-keuangan, serta rencana pengembangan usaha secara berkelanjutan. Adapun rencana strategis Perseroan untuk tahun 2026 dijabarkan sebagai berikut.

Apart from financial projections, the Company has also established short-term, medium-term, and long-term strategic goals by taking into account financial and non-financial conditions, as well as plans for sustainable business development. The Company's strategic plan for 2026 is outlined as follows.

Target Jangka Pendek

1. Melanjutkan strategi diversifikasi dengan meningkatkan pinjaman dari segmen *Local business.*
2. Terus melakukan review atas portfolio dari segmen *Group Collaboration* dengan tetap menerapkan *Risk Acceptance Criteria* dalam proses persetujuan pinjaman, guna menjaga kualitas aset.
3. Pengembangan sistem *Big-Data* dan *Analytic* terutama yang mendukung pengambilan keputusan persetujuan pinjaman retail yang berbasis data, serta ketersediaan data dengan kualitas data yang baik guna mendukung pelaporan kepada regulator.
4. Mengembangkan metode penilaian *Internal Credit Rating* yang dapat memberikan gambaran tingkat kesehatan calon debitur dan/atau debitur sejak dini sehingga dapat mendukung proses pemberian kredit sejak awal, proses inisiasi dapat dilakukan setelah sesuai dengan target debitur dan/atau *risk appetite* Bank. *Internal Credit Rating assessment* dapat memperkirakan besaran risiko yang akan ditanggung Bank dari portofolio yang ada melalui rasio *probability of default* yang terukur dari masing-masing tingkatan rating.
5. Melakukan investasi ke *corporate bonds* untuk diversifikasi portofolio, peningkatan profitabilitas melalui imbal hasil yang lebih tinggi, dan juga untuk pengelolaan likuiditas dengan mempertimbangkan kondisi pasar.
6. Rencana pengembangan produk dan layanan untuk sumber pendapatan lain.
7. Mengembangkan produk wealth management, termasuk bancassurance untuk pertumbuhan dana murah dengan tetap menjaga likuiditas Bank, dengan tujuan untuk memiliki pendanaan yang stabil dan menurunkan *cost of fund*.
8. Menerapkan *cost discipline management* guna meningkatkan efisiensi biaya operasional tanpa mengurangi kualitas dan produktivitas, dengan memaksimalkan sumber daya/ *resources* yang dimiliki oleh Bank.

Target Jangka Menengah

1. Terus melakukan inovasi dalam *product development* untuk dapat meningkatkan portfolio pinjaman dari segmen *local business* yang memenuhi kebutuhan nasabah secara berkesinambungan untuk mendukung perbaikan rentabilitas dan strategi diversifikasi.
2. Meningkatkan level pelayanan yang komprehensif secara berkelanjutan kepada nasabah baik secara daring maupun luring.

Short-Term Targets

1. Continue the diversification strategy through new loan products and expanding channeling partner based.
2. Continuously review the portfolio of the Group Collaboration segment while maintaining the application of Risk Acceptance Criteria in the loan approval process to maintain asset quality.
3. Develop Big Data and Analytics systems, particularly those supporting data-driven decision-making for retail loan approvals, as well as ensuring the availability of high-quality data to support reporting to regulators.
4. Develop an Internal Credit Rating assessment method that can provide an early indication of the financial health of prospective borrowers and/or borrowers, thereby supporting the credit granting process from the beginning; the initiation process can proceed once it aligns with the Bank's target debtors and/or risk appetite. The Internal Credit Rating assessment can estimate the magnitude of risk the Bank will bear from the existing portfolio through the probability of default ratio measured for each rating level.
5. Invest in corporate bonds to diversify the portfolio, increase profitability through higher yield enhancement, and manage liquidity in consideration of the prevailing market conditions
6. Product or services development plan to generate other source of revenue.
7. Develop wealth management products, including bancassurance, to grow low-cost funding while maintaining the Bank's liquidity, aiming to secure stable funding and reducing the cost of funds.
8. Implement cost discipline management to improve operational cost efficiency without compromising quality and productivity, by maximizing Bank's available resources.

Medium-Term Targets

1. Continue innovating in product development to expand the loan portfolio in the local business segment, consistently meeting customer needs to support improved profitability and diversification strategies.
2. Continuously improve the level of comprehensive service to customers both online and offline.

3. Melakukan pengembangan transformasi teknologi informasi secara berkelanjutan untuk terus mendukung perkembangan bisnis perbankan digital, mitigasi risiko serta efisiensi biaya operasional.
4. Meningkatkan kemampuan bersaing di tengah peningkatan persaingan dari kompetitor (bank dengan layanan digital lainnya).
5. Pengembangan produk AI (kecerdasan buatan) untuk menghasilkan produk atau layanan yang inovatif, meningkatkan efisiensi operasional, pengalaman nasabah, yang dapat memenuhi kebutuhan nasabah

3. Continuously develop information technology transformation to support the growth of digital banking, risk mitigation, and operational cost efficiency.
4. Enhance competitive capabilities amid increasing competition from competitors (other banks with digital services).
5. Develop AI (artificial intelligence) products to create innovative products or services, improve operational efficiency and the customer experience, and meet customer needs

Prospek Usaha
Business Prospects

Tingkat inflasi pada tahun 2026 diperkirakan tetap terkendali dalam kisaran 2,5%-3,1% (*year on year*). Bank Indonesia terus mengoptimalkan bauran kebijakan moneter guna menjaga stabilitas ekonomi sekaligus mendukung pertumbuhan ekonomi yang berkelanjutan.

Dalam Rapat Dewan Gubernur Bank Indonesia pada Maret 2026, diputuskan untuk mempertahankan suku bunga acuan (BI-Rate) pada level 5,75%, dengan suku bunga *Deposit Facility* sebesar 5,00% dan *Lending Facility* sebesar 6,50%. Kebijakan tersebut diambil sebagai respons atas ketidakpastian ekonomi global, dengan tujuan menjaga stabilitas nilai tukar Rupiah, mengendalikan inflasi, serta mendukung momentum pertumbuhan ekonomi nasional.

Pemerintah melaporkan pertumbuhan ekonomi Indonesia pada tahun 2025 berada pada 5,39%. Pertumbuhan kredit perbankan mencapai 9,69%, didukung oleh prospek ekonomi yang positif serta kebijakan makroprudensial yang tetap akomodatif.

Mengacu pada kondisi tersebut, pada tahun 2026 Perseroan memfokuskan strategi pada pertumbuhan penyaluran kredit yang berkualitas guna menjaga tingkat NPL tetap sehat, disertai perluasan pasar dan diversifikasi segmen nasabah. Selain itu, Perseroan juga mengoptimalkan pengembangan dana murah (*CASA*), layanan *payroll*, dan *cash management*, dengan tetap menjaga operasional perbankan yang sehat dan efisien. Upaya ini diharapkan dapat mendorong perbaikan kinerja Perseroan secara berkelanjutan.

The inflation rate in 2026 is projected to remain under control within the range of 2.5%-3.1% (year on year). Bank Indonesia continues to optimize its monetary policy mix to maintain economic stability while supporting sustainable economic growth.

At the Bank Indonesia Board of Governors' meeting in March 2026, decision was made to maintain the benchmark interest rate (BI-Rate) at 5.75%, with the Deposit Facility rate at 5.00% and the Lending Facility rate at 6.50%. This policy was adopted in response to global economic uncertainty, with the aim of maintaining the stability of the Rupiah exchange rate, controlling inflation, and supporting the momentum of national economic growth.

The Government reports Indonesia's economic growth in 2025 to be at 5.39%. The growth of banking credit reached 9.69%, supported by positive economic prospects and accommodative macroprutential policies.

Given these conditions, the Company will focus its strategy in 2026 on growing high-quality credit disbursement to maintain a healthy NPL ratio, alongside market expansion and customer segment diversification. Additionally, the Company will optimize the development of low-cost funding (CASA), payroll services, and cash management, while maintaining healthy and efficient banking operations. These efforts are expected to drive sustainable improvements in the Company's performance.

Investor Relations

Investor Relations

Fungsi *Investor Relations* Perseroan didedikasikan untuk menjaga komunikasi yang transparan, tepat waktu, dan konsisten dengan para pemegang saham, analis, serta calon investor. Sepanjang tahun, Perseroan secara aktif terlibat dalam berbagai kegiatan seperti paparan kinerja (*earnings call*), pertemuan dengan analis, konferensi investor, *public expose* (kolaborasi dengan *Corporate Secretary*), serta pertemuan baik secara individu maupun kelompok dengan investor institusi dan ritel. Fungsi Investor Relations Perseroan bertujuan untuk menyampaikan standar keterbukaan informasi yang tinggi, memastikan akurasi informasi, serta memberikan pembaruan yang jelas mengenai kinerja keuangan dan arah strategis Perseroan.

The Company's Investor Relation function is dedicated to maintaining transparent, timely, and consistent communication with shareholders, analysts, and prospective investors. During the year, the Company actively engaged on a wide range activities such as earnings calls, analyst meetings, investor conferences, public expose (collaboration with Corporate Secretary), and both one-on-one and group meetings with institutional and retail investors. The Company's Investor Relations is aimed to deliver high standards of disclosure, accuracy of information, provide clear updates on financial performance and the Company's strategic direction.

Investor Relations senantiasa menyempurnakan pengungkapan informasi untuk memberikan wawasan yang lebih mendalam mengenai pendorong bisnis, kinerja bisnis, serta pengelolaan risiko. Salah satu strategi Perseroan adalah secara aktif menginkorporasikan masukan dari pasar dan pemegang saham guna meningkatkan transparansi serta melakukan *benchmarking* untuk memperkuat kredibilitas informasi dan komunikasi. Situs web *Investor Relations* juga telah didesain ulang untuk meningkatkan aksesibilitas dan *user experience*. Sejumlah inisiatif baru telah diperkenalkan, termasuk serangkaian kegiatan keterlibatan yang diselenggarakan pada tahun 2025, seperti pertemuan investor ritel bersama Stockbit, acara Temu Emiten, serta pertemuan investor institusi bersama RHB Securities.

The Investor Relations continuously refine the information disclosures to provide deeper insights into business drivers, business performance, and risk management. One of the Company's strategies is to actively incorporate market and shareholders' feedback to enhance transparency and benchmarking to strengthen our credibility of information and communication. Investor Relation website was redesigned to enhance accessibility and improve user experience. Several new initiatives were introduced, including a series of engagement events conducted in 2025, such as retail investor gathering with Stockbit, Temu Emiten event, institutional investor gathering with RHB Securities.

Aktifitas Investor Relations
Investor Relations Activities

Uraian*) Descriptions*)	**2025**
Paparan Kinjerja Earnings Call	4x 4Q24 (17 Apr 2025) 1Q25 (9 May 2025) 2Q25 (5 Aug 2025) 3Q25 (5 Nov 2025)
Paparan Publik Tahunan Annual Public Expose	1x (16 Nov 2025)

Pada tahun 2025, fungsi *Investor Relations* diintegrasikan ke dalam Corporate Planning untuk meningkatkan keselarasan antara perencanaan strategis, kinerja keuangan, dan komunikasi eksternal dengan para pemangku kepentingan. Selain itu, Corporate Planning juga mengawasi pengelolaan neraca, sehingga fungsi *Investor Relations* memiliki keterkaitan yang lebih kuat antara eksekusi strategi, struktur permodalan, dan likuiditas guna mendukung perwujudan nilai jangka panjang secara menyeluruh.

Ke depannya, Perseroan akan terus memanfaatkan platform digital, memperluas kanal keterlibatan, serta memperkuat transparansi untuk membangun kepercayaan yang berkelanjutan dan mendukung penciptaan nilai pemegang saham yang berkelanjutan.

In 2025, the function of Investor Relation is integrated under Corporate Planning to enhance alignment between strategic planning, financial performance, and external communication with stakeholders. In addition, Corporate Planning also oversees balance sheet management, enabling Investor Relation function to have a deeper linkage between strategic execution, capital structure, and liquidity to enable an overall long-term value creation.

Going forward, the Company will continue to leverage digital platforms, expand engagement channels, and strengthen transparency to build lasting trust and support sustainable shareholder value.



Aspek Pemasaran
Marketing Aspects



Strategi Pemasaran

Sebagai bagian dari implementasi strategi bisnis yang adaptif, Perseroan secara berkala melakukan evaluasi menyeluruh terhadap segmen pasar yang dilayani serta mencermati tingkat persaingan dalam industri perbankan.

Sepanjang tahun 2025, kondisi likuiditas perbankan nasional tetap terjaga dan mendukung kapasitas penyaluran kredit, disertai dengan peningkatan fungsi intermediasi. Ketahanan sektor perbankan juga tetap solid, tercermin dari permodalan yang kuat dan risiko kredit yang relatif rendah. Di sisi lain, aktivitas ekonomi dan transaksi keuangan digital terus menunjukkan kinerja yang positif, didukung oleh sistem pembayaran yang aman, andal, dan lancar. Dinamika pasar tersebut turut mempengaruhi kinerja Perseroan.

Marketing Strategy

As part of the implementation of an adaptive business strategy, the Company periodically conducts a comprehensive evaluation of the market segments it serves and monitors the level of competition within the banking industry.

Throughout 2025, national banking liquidity conditions remained stable and supported lending capacity, accompanied by enhanced intermediation functions. The banking sector's resilience also remained solid, reflected in strong capitalization and relatively low credit risk. Meanwhile, economic activity and digital financial transactions continued to demonstrate positive performance, supported by secure, reliable, and seamless payment systems. These market dynamics also influenced the Company's performance.

Berangkat dari pemahaman terhadap karakteristik pasar dan tingkat persaingan, Perseroan secara disiplin menerapkan kebijakan pengelolaan biaya di seluruh lini organisasi. Setiap pengeluaran diarahkan agar memberikan kontribusi nyata terhadap peningkatan pendapatan secara berkelanjutan. Perseroan juga terus memanfaatkan peluang yang ada dengan menyediakan produk dan layanan perbankan yang relevan dan sesuai dengan kebutuhan masyarakat.

Based on an understanding of market characteristics and the level of competition, the Company rigorously implements cost management policies across all organizational levels. Every expenditure is aimed at making a tangible contribution to sustainable revenue growth. The Company also continues to capitalize on existing opportunities by providing banking products and services that are relevant and aligned with public needs.

Fokus utama Perseroan meliputi penguatan fundamental usaha, peningkatan kualitas kredit, menjaga pendapatan bunga, serta pelaksanaan efisiensi operasional. Strategi pendanaan diarahkan pada pertumbuhan dana murah melalui produk tabungan dan giro, didukung oleh penyelenggaraan program-program menarik serta peningkatan kualitas layanan bagi nasabah eksisting, baik perorangan maupun non-perorangan. Upaya ini ditujukan untuk meningkatkan proporsi *quality customer* dan memperkuat keterikatan nasabah dengan Perseroan.

The Company's primary focus is on strengthening business fundamentals, improving credit quality, maintaining interest income, and implementing operational efficiency. The funding strategy is directed at growing low-cost funds through savings and current accounts, supported by the implementation of attractive programs and improvements in service quality for existing customers, both individual and non-individual. These efforts are aimed at increasing the proportion of quality customers and strengthening customer loyalty to the Company.

Selain itu, Perseroan menitikberatkan pertumbuhan penyaluran kredit yang berkualitas, melakukan perluasan pasar dan diversifikasi segmen nasabah, serta mengoptimalkan kerja sama strategis dengan pihak ketiga.

Additionally, the Company prioritizes the growth of quality credit disbursement, market expansion, and diversification of customer segments, as well as optimizing strategic partnerships with third parties.

Sejalan dengan pengembangan layanan perbankan digital, Perseroan juga memfokuskan strategi pemasaran pada peningkatan pemanfaatan layanan *Corporate Internet Banking, API Disbursement* dan *Payroll* yang ditujukan bagi segmen korporasi. Strategi tersebut dilaksanakan melalui pendekatan berbasis kebutuhan nasabah, peningkatan kemudahan integrasi sistem, serta penyediaan layanan transaksi yang aman, andal, dan efisien guna mendukung aktivitas operasional dan pengelolaan keuangan nasabah.

In line with the development of digital banking services, the Company also focuses its marketing strategy on increasing the utilization of Corporate Internet Banking, API Disbursement dan Payroll services targeted at the corporate segment. This strategy is implemented through a customer-centric approach, improved system integration convenience, and the provision of secure, reliable, and efficient transaction services to support customers' operational activities and financial management.

Dalam rangka mendukung implementasi strategi tersebut, Perseroan secara aktif melakukan edukasi kepada nasabah, pendampingan proses implementasi layanan, serta penguatan sinergi dengan mitra bisnis dan ekosistem digital. Upaya ini diharapkan dapat meningkatkan volume transaksi, memperluas basis nasabah korporasi, meningkatkan pendapatan berbasis komisi, serta memperkuat posisi Bank Neo Commerce dalam persaingan layanan perbankan digital.

To support the implementation of this strategy, the Company actively educates customers, provides guidance on service implementation processes, and strengthens synergies with business partners and the digital ecosystem. These efforts are expected to increase transaction volume, expand the corporate customer base, boost commission-based revenue, and strengthen Bank Neo Commerce's position in the digital banking services market.

Pangsa Pasar

Kinerja Perseroan dibandingkan dengan industri perbankan secara nasional disajikan pada tabel berikut.

Market Share

The Company's performance compared to the national banking industry is presented in the following table.

dalam miliar Rupiah | in billion Rupiah

Uraian*) Descriptions*)		2025	2024
Aset Assets	Industri Perbankan Banking Industry	13.646.417	12.460.955
	BNC	18.973	17.409
Dana Pihak Ketiga Third Party Funds	Industri Perbankan Banking Industry	10.057.543	8.837.242
	BNC	14.026	13.063
Kredit Loans	Industri Perbankan Banking Industry	8.693.972	7.942.946
	BNC	7.183	8.822

*) Sumber Data Industri Perbankan: OJK, Statistik Perbankan Indonesia Desember 2025.
*) Source of Banking Industry Data: OJK, Indonesian Banking Statistics, December 2025.

Pada tahun 2025, pangsa pasar Perseroan tercatat sebesar 0,14% dari sisi aset, 0,14% dari sisi Dana Pihak Ketiga (DPK), dan 0,08% dari sisi penyaluran kredit.

In 2025, the Company's market share stood at 0.14% in terms of assets, 0.14% in terms of Third Party Funds (TPF), and 0.08% in terms of loan distribution.

Perubahan Ketentuan Peraturan Perundang-Undangan

Sepanjang tahun 2025, terdapat sejumlah perubahan peraturan perundang-undangan yang memberikan dampak signifikan terhadap kegiatan usaha Perseroan. Rincian perubahan regulasi serta dampaknya terhadap Perseroan disajikan pada tabel berikut.

Regulatory Changes

Throughout 2025, there were a number of regulatory changes that had a significant impact on the Company's business activities. Details of the regulatory changes and their impact on the Company are presented in the following table.

Peraturan Perundang-undangan Laws and Regulations	Pokok Perubahan Key Changes	Latar Belakang Background	Dampak Impact
PADG No 7 Tahun 2025 Tentang Perubahan Ketiga Atas PADG No 11 tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial (KLM) PADG No. 7 of 2025 on the Third Amendment to PADG No. 11 of 2023 on the Enforcement Regulation for the Macroprudential Liquidity Incentive Policy (KLM)	1. Penyesuaian cakupan sektor tertentu yang ditetapkan Bank Indonesia. 2. Penyesuaian besaran KLM sehingga besaran KLM secara keseluruhan menjadi paling banyak sebesar 5%. 3. Penyesuaian pengaturan mengenai tambahan besaran KLM. 4. Penyesuaian batas waktu penerimaan data, penyampaian informasi. 1. Adjustments to the coverage of specific sectors as determined by Bank Indonesia. 2. Adjustments to the KLM threshold so that the total KLM threshold does not exceed 5%. 3. Adjustments to the regulations regarding additional KLM thresholds. 4. Adjustments to the deadlines for data receipt and information submission.	Dalam rangka mendukung pertumbuhan ekonomi yang berkelanjutan, Bank Indonesia mendorong penyaluran kredit melalui penguatan kebijakan makroprudensial longgar berupa penguatan KLM. To support sustainable economic growth, Bank Indonesia is encouraging credit distribution by strengthening accommodative macroprudential policies, specifically by tightening the KLM.	Berdampak terhadap laporan Keuangan Impacting the Financial Statements
PADG No 8 Tahun 2025 Tentang Perubahan Ketiga Atas PADG no 24/8/PADG/2022 tentang Peraturan Pelaksanaan Pemenuhan Giro Wajib Minimum Dalam Rupiah dan Valuta asing bagi bank Umum Konvensional (BUK), Bank Umum Syariah (BUS), dan Unit Usaha Syariah (UUS) PADG No. 8 of 2025 on the Third Amendment to PADG No. 24/8/PADG/2022 regarding the Enforcement Regulation on the Maintenance of Minimum Regulatory Reserve Requirements (GWM) in Rupiah and Foreign Currency for Conventional Commercial Banks (BUK), Sharia Commercial Banks (BUS), and Sharia Business Units (UUS)	1. Penyesuaian besaran bagian tertentu dari pemenuhan kewajiban GWM dalam rupiah yang diberikan remunerasi GWM bagi BUK, atau insentif GWM berupa pemberian (‘athaya) bagi BUS dan UUS setelah memperhitungkan besaran pelonggaran atas kewajiban pemenuhan GWM, yakni KLM. 2. Besaran bagian tertentu dari pemenuhan kewajiban GWM dalam rupiah yang diberikan remunerasi GWM bagi BUK, atau insentif GWM berupa pemberian (‘athaya) bagi BUS dan UUS 1. Adjustment to the specific portion of the rupiah GWM requirement for which GWM remuneration is provided to BUK, or GWM incentives in the form of grants (‘athaya) for BUS and UUS, after taking into account the amount of the relaxation of the GWM requirement, namely KLM. 2. The specific portion of the rupiah GWM requirement for which GWM remuneration is provided to BUK, or GWM incentives in the form of grants (‘athaya) for BUS and UUS	Mendukung pertumbuhan ekonomi berkelanjutan dengan tetap menjaga prinsip kehati-hatian. Pada RDG Februari 2025 ditetapkan untuk menambah besaran insentif KLM dari maksimal 4% menjadi maksimal 5% dari DPK. KLM diberikan ke bank berupa pelonggaran dari kewajiban pemenuhan GWM Rupiah secara rata rata. Supporting sustainable economic growth while maintaining the principle of prudence. At the February 2025 Monetary Policy Meeting, a decision was made to increase the KLM incentive from a maximum of 4% to a maximum of 5% of deposit liabilities. The KLM is provided to banks in the form of a relaxation of the requirement to meet the average Rupiah GWM.	Tidak berdampak terhadap laporan Keuangan Does not impact the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
PADG No 11 Tahun 2025 Tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan unit Usaha Syariah PADG No. 11 of 2025 on the Macroprudential Intermediation Ratio and the Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units	1. Penyesuaian pengaturan Penyangga Likuiditas Makroprudensial (PLM) sebagai berikut: a. Besaran PLM dari 5% menjadi 4% dari DPK BUK dalam rupiah. b. Penggunaan Securities BUK dalam transaksi repo dan transaksi PasBI yang dapat diperhitungkan untuk pemenuhan paling banyak dari 5% menjadi 4% dari DPK BUK. 2. Penyesuaian Contoh Pemenuhan Giro RIM, Giro RIM Syariah, PLM, dan PLM Syariah, serta perhitungan sanksi kewajiban membayar dan Contoh Pemenuhan Giro RIM dan PLM bagi Bank yang Melakukan Penggabungan pada Lampiran PADG dimaksud. 1. Adjustments to the Macroprudential Liquidity Buffer (PLM) settings are as follows: a. The PLM rate is reduced from 5% to 4% of BUK's deposit-taking liabilities in rupiah. b. The use of BUK securities in repo transactions and PasBI transactions that can be counted toward compliance is reduced from a maximum of 5% to 4% of BUK's deposit-taking liabilities. 2. Adjustments to the Examples of Compliance for RIM Demand Deposits, Sharia RIM Demand Deposits, PLM, and Sharia PLM, as well as the calculation of penalties for failure to pay and Examples of Compliance for RIM Demand Deposits and PLM for Banks Engaging in Mergers in the aforementioned PADG Annex.	Dalam rangka mendukung pertumbuhan ekonomi yang berkelanjutan, Bank Indonesia mendorong penyaluran kredit atau pembiayaan perbankan. Untuk itu, Bank Indonesia melakukan penguatan kebijakan makroprudensial berupa penurunan besaran rasio Penyangga Likuiditas Makroprudensial (PLM) dan besaran rasio PLM Syariah yang ditujukan untuk meningkatkan fleksibilitas pengelolaan likuiditas oleh perbankan guna mendorong penyaluran kredit. To support sustainable economic growth, Bank Indonesia is encouraging the distribution of credit and banking financing. To this end, Bank Indonesia has strengthened its macroprudential policies by lowering the Macroprudential Liquidity Buffer (PLM) ratio and the Sharia PLM ratio, with the aim of increasing the flexibility of banks' liquidity management to boost credit distribution.	Tidak berdampak terhadap laporan Keuangan Does not impact the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
POJK No.18 tentang Transparansi dan Publikasi Laporan Bank POJK No. 18 on the Transparency and Publication of Bank Reports	1. Laporan Publikasi wajib disajikan dalam mata uang Rupiah. 2. Laporan Publikasi wajib disusun secara lengkap, akurat, kini, utuh, tepat waktu, dan dapat diperbandingkan Angka dalam laporan publikasi sesuai dengan angka yang diungkapkan pada laporan keuangan. Untuk posisi data bulan Desember wajib diaudit oleh akuntan publik. 3. Laporan Keuangan berdasarkan standar akuntansi disajikan dalam bentuk: a. Laporan keuangan secara individu; dan/atau b. Laporan keuangan secara konsolidasi. 4. Penyusun Laporan Keuangan: a. Penunjukan Pejabat Eksekutif (PE) b. Kompetensi Penyusun dan Anggota Penyusun Laporan Keuangan. c. Penggantian PE dan/atau Anggota Penyusun Laporan Keuangan. d. Pemenuhan kompetensi dilaksanakan paling lambat 24 bulan sejak POJK ini berlaku. 5. Jenis Laporan Publikasi Bank sebagai berikut: a. Laporan Publikasi Keuangan dan Informasi Kinerja b. Laporan Publikasi Eksposur Risiko dan Permodalan c. Laporan Publikasi Informasi atau Fakta Material d. Laporan Publikasi Suku Bunga Dasar kredit. e. Laporan Keberlanjutan f. Laporan Tahunan Pelaksanaan Tata Kelola Terintergrasi Bank yang merupakan perusahaan induk konglomerasi keuangan. g. Laporan Keuangan Tahunan bagi Bank yang merupakan Emiten atau Perusahaan Publik. h. Laporan Lain. 6. Periode Laporan: a. Bulanan b. Triwulanan c. Semesteran d. Tahunan e. Insidental. 7. Bank pertama kali mengumumkan laporan sebagaimana diatur dalam POJK ini.	POJK Nomor 18 Tahun 2025 merupakan harmonisasi dari peraturan perundangundangan terkini serta mengatur lebih jelas terkait Transparansi dan Publikasi Laporan Bank. POJK No. 18 of 2025 is a harmonization of the latest laws and regulations and provides clearer guidelines regarding the Transparency and Publication of Bank Reports.	Berdampak terhadap laporan Keuangan Impacting the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
	1. Publication reports must be presented in Indonesian Rupiah. 2. Publication reports must be complete, accurate, up-to-date, comprehensive, timely, and comparable. The numbers in the publication report must match those disclosed in the financial statements. Data as of December must be audited by a public accountant. 3. Financial Statements prepared in accordance with accounting standards shall be presented in the form of: a. Individual financial statements; and/or b. Consolidated financial statements. 4. Preparation of Financial Statements: a. Appointment of Executive Officer (EO) b. Competency of the Compiler and Members of the Financial Statement Preparation Team. c. Replacement of the Executive Officer (EO) and/or members of the Financial Statement Preparation Team. d. Compliance with competency requirements must be achieved no later than 24 months from the effective date of this POJK. 5. Types of Bank Disclosure Reports are as follows: a. Financial and Performance Information Disclosure Report b. Risk Exposure and Capital Disclosure Report c. Publication Report on Material Information or Facts d. Publication Report on Prime Lending Rate. e. Sustainability Report f. Annual Report on the Implementation of Integrated Governance for Banks that are parent companies of financial conglomerates. g. Annual Financial Statements for Banks that are Issuers or Public Companies. h. Other Reports. 6. Reporting Period: a. Monthly b. Quarterly c. Semiannual d. Annual e. Ad hoc. 7. The Bank shall first publish the reports as stipulated in this POJK.		

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
POJK No. 22 Tahun 2025 Tentang Pelaporan Bank Umum Melalui Sistem Pelaporan Otoritas Jasa Keuangan POJK No. 22 of 2025 on Reporting by Commercial Banks Through the Financial Services Authority Reporting System	Mengatur mengenai kewajiban bagi bank umum untuk menyampaikan Laporan secara daring melalui sistem pelaporan OJK yang mecakup laporan berkala dan laporan insidental. Selain itu. POJK ini juga mengatur penggabungan beberapa informasi/laporan dalam laporan induk serta penghapusan laporan sebagai bentuk penyederhanaan pelaporan bagi bank umum. This regulation establishes the obligation for commercial banks to submit reports online through the OJK's reporting system, which includes periodic and ad hoc reports. In addition, this POJK also regulates the consolidation of certain information and reports into a master report, as well as the elimination of certain reports, as part of efforts to streamline reporting for commercial banks.	Meningkatkan efisiensi pengawasan sektor perbankan, Otoritas Jasa Keuangan mengembangkan sistem pelaporan sebagai sarana untuk mendapatkan informasi kondisi keuangan dan kegiatan usaha bank yang komprehensif, lengkap, akurat, terkini, utuh, dan tepat waktu. Penyampaian informasi kondisi keuangan dan kegiatan usaha bank perlu difokuskan dengan mempertimbangkan relevansi dan kebutuhan dalam proses pengawasan terkini sehingga dilakukan penyederhanaan (simplifikasi) Laporan yang disampaikan kepada Otoritas Jasa Keuangan. To enhance the efficiency of banking sector supervision, the Financial Services Authority has developed a reporting system as a means of obtaining comprehensive, complete, accurate, up-to-date, and timely information on banks' financial conditions and business activities. The submission of information regarding banks' financial conditions and business activities must be focused with due consideration for relevance and needs in the current supervision process, thereby simplifying the reports submitted to the Financial Services Authority. The reporting of banks' financial conditions and business activities must be tailored to the relevance and requirements of the current supervisory process, thereby simplifying the reporting process to Financial Services Authority.	Tidak berdampak terhadap laporan Keuangan Does not impact the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
PADG No. 23 Tahun 2025 Tentang Rasio Intermediasi Makroprudensial Dan Penyangga Likuiditas Makroprudensial Bagi Bank Umum Konvensional, Bank Umum Syariah, Dan Unit Usaha Syariah PADG No. 23 of 2025 on the Macroprudential Intermediation Ratio and the Macroprudential Liquidity Buffer for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units	1. Penambahan jenis surat berharga/surat berharga syariah yang diperhitungkan dalam PLM/PLM Syariah (BI-FRN, surat berharga yang diterbitkan oleh lembaga jasa keuangan lain yang dibentuk atau didirikan pemerintah untuk mendukung program pemerintah bagi kesejahteraan masyarakat, yang ditetapkan oleh Bank Indonesia) 2. Penambahan pengaturan bahwa Bank Indonesia dapat menetapkan surat berharga/ surat berharga syariah lain beserta kriteria atau mekanismenya untuk dapat diperhitungkan dalam RIM/RIM Syariah. 3. Penyesuaian komponen Pembiayaan untuk perhitungan RIM Syariah: Data Pembiayaan dalam rupiah dan valuta asing sebagaimana diperoleh dari pos Pembiayaan Non-Bank dalam Kelompok Informasi Keuangan - Informasi dalam laporan posisi keuangan Harian dalam LBUT. 4. Penambahan pengaturan untuk menegaskan perlakuan Securities korporasi/surat berharga syariah korporasi yang dimiliki bank yang sedang digunakan dalam transaksi repo antarbank/repo syariah antarbank/transaksi Sertifikat Pengelolaan Dana Berdasarkan Prinsip Syariah Antarbank (SiPA) dan surat berharga korporasi/ surat berharga syariah korporasi yang dimiliki bank yang sedang digunakan dalam transaksi repo kepada Bank Indonesia dalam rangka operasi pasar terbuka dalam perhitungan RIM dan RIM Syariah	Dalam rangka mendukung pertumbuhan ekonomi yang berkelanjutan, Bank Indonesia mendorong penyaluran kredit atau Pembiayaan perbankan. Untuk itu, Bank Indonesia melakukan penguatan kebijakan makroprudensial yang didukung dengan penguatan pengaturan instrumen perkreditan atau Pembiayaan bagi BUK, BUS, dan UUS yaitu instrumen RIM dan RIM Syariah serta penguatan pengaturan instrumen batasan risiko likuiditas bagi BUK dan BUS yaitu instrumen PLM dan PLM Syariah. In order to support sustainable economic growth, Bank Indonesia is encouraging the distribution of credit or bank financing. Therefore, Bank Indonesia is strengthening macroprudential policies, supported by enhanced regulations on credit or financing instruments for BUK, BUS, and UUS, specifically the RIM and Sharia RIM instruments, as well as strengthened regulations on liquidity risk limit instruments for BUK and BUS, namely the PLM and Sharia PLM instruments.	Berdampak terhadap laporan Keuangan Impacting the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
	1. Addition of types of Securities/ Sharia Securities eligible for inclusion in the PLM/Sharia PLM (BI-FRN, securities issued by other financial institutions established or incorporated by the government to support government programs for public welfare, as determined by Bank Indonesia) 2. Addition of a provision that Bank Indonesia may designate other securities/Sharia securities, along with their criteria or mechanisms, to be included in the RIM/Sharia RIM. 3. Adjustment of the Financing component for Sharia RIM calculations: Financing data in rupiah and foreign currency as derived from the Non-Bank Financing item within the Financial Information Group—Information in the Daily Financial Position Report in LBUT. 4. Addition of provisions to clarify the treatment of corporate securities/ corporate Sharia securities held by banks that are currently used in interbank repo transactions/ interbank Sharia repo transactions/interbank Sharia Fund Management Certificate (SiPA) transactions, and corporate securities/corporate Sharia securities held by the bank that are currently being used in repo transactions with Bank Indonesia in the context of open market operations in the calculation of RIM and Sharia RIM		

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
SEOJK No.29/ SEOJK.03/2025 tentang Transaparansi dan Publikasi Laporan Bank Umum Konvensional SEOJK No. 29/ SEOJK.03/2025 on the Transparency and Publication of Reports by Conventional Commercial Banks	1. Prinsip Laporan Publikasi a. Laporan Publikasi adalah laporan yang diumumkan kepada masyarakat dan/atau disampaikan kepada OJK. b. Laporan Publikasi disusun dalam Bahasa Indonesia dan dapat dilengkapi bahasa asing. c. Format Laporan Publikasi merupakan standar minimum yang harus dipenuhi oleh Bank. d. Informasi moneter disajikan dalam jutaan Rupiah. 2. Pengumuman Pertama Kali terhadap Laporan Publikasi keuangan dan Informasi Kinerja Keuangan periode Bulanan, Semesteran, Triwulanan, dan Tahunan serta Laporan Publikasi Eksposur Risiko dan Permodalan untuk Periode Triwulanan dan Tahunan. 1. Principles of Publication Reports a. Publication Report is a report that is disclosed to the public and/or submitted to the Financial Services Authority (OJK). b. Publication Reports are prepared in the Indonesian language and may be supplemented with a foreign language. c. The format of the Publication Report represents the minimum standard that must be complied with by the Bank. d. Monetary information is presented in millions of Rupiah. 2. Initial Disclosure of Publication Reports Initial disclosure applies to Financial Publication Reports and Financial Performance Information on a Monthly, Semi-Annual, Quarterly, and Annual basis, as well as Publication Reports on Risk Exposure and Capital for Quarterly and Annual periods.	Sebagai ketentuan pelaksanaan dari POJK No.18 Tahun 2025 tentang Transparansi dan Publikasi Laporan Bank. As a provision for the implementation of POJK No. 18 of 2025 on Transparency and the Publication of Bank Reports.	Berdampak terhadap laporan Keuangan Impacting the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
SEOJK No.31/ SEOJK.03/2025 tentang Pelaporan Bank Umum Konvensional Melalui Sistem Pelaporan Otoritas Jasa Keuangan SEOJK No. 31/ SEOJK.03/2025 on Reporting by Conventional Commercial Banks Through the Financial Services Authority Reporting System	1. Ketentuan Umum Pelaporan, mencakup: a. Periodisasi Pelaporan b. Kondisi/Kriteria Wajib Lapor c. Kelompok Informasi Pelaporan. 2. Laporan Insidental disampaikan pertama kali melalui APOLO mulai tanggal 1 Januari 2026. 3. Mekanisme penyampaian penunjukan atau perubahan penanggung jawab pelaporan serta penyampaian pertanyaan. 4. Lampiran SEOJK ini sebagai berikut: a. Jenis Laporan, Batas Waktu, Posisi Data Pertama Kali via APOLO. b. Format dan Pedoman Penyusunan Laporan Berkala. c. Format dan Pedoman Penyusunan Laporan Insidental. d. Format Surat Penunjukan ARO. 1. General Reporting Provisions, including: a. Reporting Periods b. Conditions/Criteria for Mandatory Reporting c. Categories of Information Reporting. 2. Incidental reports must be submitted via APOLO for the first time starting January 1, 2026. 3. Mechanisms for submitting the appointment or change of the reporting officer, as well as for submitting inquiries. 4. The attachments to this SEOJK are as follows: a. Report Types, Deadlines, and First Data Submission via APOLO. b. Format and Guidelines for Preparing Periodic Reports. c. Format and Guidelines for Preparing Incidental Reports. d. ARO Appointment Letter Format.	Sebagai Ketentuan Pelaksana dari POJK No. 22 Tahun 2025 tentang Pelaporan Bank Umum Melalui Sistem Pelaporan Otoritas Jasa Keuangan. As Implementing Regulations for POJK No. 22 of 2025 on Reporting by Commercial Banks Through the Financial Services Authority Reporting System.	Tidak berdampak terhadap laporan Keuangan Does not impact the financial statements

Peraturan Perundang-undangan Laws and Regulations	**Pokok Perubahan** Key Changes	**Latar Belakang** Background	**Dampak** Impact
PADG No. 31 Tahun 2025 Tentang Perubahan Keempat 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 PADG No. 31 of 2025 on the Fourth Amendment to Board of Governors Regulation No. 24/8/ PADG/2022 on the Implementing Regulations for the Fulfillment of Minimum Regulatory Reserve Requirements (GWM) in Rupiah and Foreign Currency for Conventional Commercial Banks, Islamic Commercial Banks, and Islamic Business Units	Perubahan pengaturan dalam PADG ini mencakup: a. penegasan bahwa Bank Indonesia dapat menetapkan pengecualian atas komponen DPK dalam cara perhitungan GWM b. pemberian remunerasi atas excess reserves.; dan c. penyesuaian acuan sanksi pelanggaran GWM bagi BUS dan UUS. The amendments to the PADG include: a. clarification that Bank Indonesia may grant exemptions for deposit components in the calculation of the GWM; b. the provision of remuneration for excess reserves; and c. adjustments to the penalty guidelines for GWM violations by commercial banks and credit institutions.	Bauran kebijakan Bank Indonesia diarahkan untuk mencapai stabilitas nilai rupiah, memelihara stabilitas sistem pembayaran, dan turut menjaga stabilitas sistem keuangan dalam rangka mendukung pertumbuhan ekonomi yang berkelanjutan. Untuk mencapai stabilitas nilai rupiah, Bank Indonesia melaksanakan kebijakan moneter diantaranya melalui pengaturan Giro Wajib Minimum (GWM). Kebijakan pengaturan GWM terus diperkuat agar sejalan dengan perkembangan karakteristik DPK perbankan, perkembangan likuiditas perbankan, dan perkembangan karakteristik suku bunga di perekonomian. Bank Indonesia's policy mix is aimed at achieving rupiah stability, maintaining the stability of the payment system, and contributing to the stability of the financial system in order to support sustainable economic growth. To achieve stability in the value of the rupiah, Bank Indonesia implements monetary policies, including through the regulation of the Minimum Regulatory Reserve Requirement (GWM). The GWM policy continues to be strengthened to align with developments in the characteristics of bank deposits, banking liquidity, and interest rate trends in the economy.	Tidak berdampak terhadap laporan Keuangan Does not impact the financial statements

Perubahan Kebijakan Akuntansi
Changes in Accounting Policies

Perseroan menyusun dan menerapkan kebijakan akuntansi sesuai dengan Standar Akuntansi Keuangan (SAK) yang diterbitkan oleh Dewan Standar Akuntansi Keuangan – Ikatan Akuntan Indonesia (DSAK IAI). Seluruh standar baru dan/atau revisi yang berlaku efektif untuk periode yang dimulai pada atau setelah 1 Januari 2025 telah diterapkan untuk pertama kalinya, termasuk standar-standar berikut yang relevan terhadap laporan keuangan Perseroan.

The Company establishes and applies accounting policies in accordance with the Financial Accounting Standards (FAS) issued by the Financial Accounting Standards Board – Indonesian Institute of Accountants (DSAK IAI). All new and/or revised standards that are effective from or after January 1, 2025, have been applied for the first time, including the following standards relevant to the Company's 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. Amandemen berlaku untuk periode pelaporan tahunan yang dimulai pada atau setelah 1 Januari 2025. Penerapan dini diperkenankan dimana entitas diharuskan mengungkapkan fakta tersebut.

Amendment of PSAK 221: "Lack of Exchangeability"

The amendments require disclosure of information that enables users 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 January 1, 2025. Earlier application is permitted which an entity is required to disclose that fact.

PSAK 117: "Kontrak Asuransi"

Standar akuntansi baru yang komprehensif untuk kontrak asuransi yang mencakup pengakuan dan pengukuran, penyajian dan pengungkapan, pada saat berlaku efektif PSAK 117 akan menggantikan PSAK 104: Kontrak Asuransi. PSAK 117 berlaku untuk semua jenis kontrak asuransi, jiwa, non-jiwa, asuransi langsung dan reasuransi, terlepas dari entitas yang menerbitkannya, serta untuk jaminan dan instrumen keuangan tertentu dengan fitur partisipasi tidak mengikat, serta beberapa pengecualian ruang lingkup akan berlaku. Tujuan keseluruhan dari PSAK 117 adalah untuk menyediakan model akuntansi untuk kontrak asuransi yang lebih bermanfaat dan konsisten untuk asuradur.

PSAK 117 berlaku efektif untuk periode pelaporan yang dimulai pada atau setelah tanggal 1 Januari 2025, dengan mensyaratkan angka komparatif. Penerapan dini diperkenankan bila entitas juga menerapkan PSAK 109 dan PSAK 115 pada atau sebelum tanggal penerapan awal PSAK 117. Standar ini tidak diharapkan memiliki dampak pada pelaporan keuangan Bank pada saat diadopsi untuk pertama kali.

SFAS 117: "Insurance Contracts"

A comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure, upon its effective date, SFAS 117 will replace SFAS 104: Insurance Contracts. SFAS 117 applies to all types of insurance contracts, life, non-life, direct insurance and reinsurance, regardless of the entities issuing them, as well as to certain guarantees and financial instruments with discretionary participation features, while a few scope exceptions will apply. The overall objective of SFAS 117 is to provide an accounting model for insurance contracts that is more useful and consistent for insurers.

SFAS 117 is effective for reporting periods beginning on or after January 1, 2025, with comparative figures required. Early application is permitted, provided the entity also applies SFAS 109 and SFAS 115 on or before the date of initial application of SFAS 117. This standard is not expected to have any impact to the financial reporting of the Bank upon first-time adoption.

Informasi Kelangsungan Usaha

Business Continuity Information

Hal-Hal yang Berpotensi Berpengaruh Signifikan terhadap Kelangsungan Usaha

Sepanjang tahun 2025, Perseroan tidak mengidentifikasi adanya faktor yang berpotensi memberikan dampak signifikan terhadap kelangsungan usaha. Meskipun demikian, Perseroan tetap menjaga kewaspadaan terhadap berbagai tantangan eksternal, khususnya dinamika makroekonomi global yang masih diwarnai ketidakpastian.

Dalam menghadapi kondisi tersebut, Perseroan mencermati secara seksama perkembangan pertumbuhan kredit industri perbankan dengan tetap mengedepankan prinsip kehati-hatian serta selektivitas dalam penyaluran kredit. Pendekatan ini dilakukan untuk memastikan kualitas aset tetap terjaga secara berkelanjutan.

Perseroan juga berkomitmen untuk terus meningkatkan standar kebijakan persetujuan kredit guna mendorong pertumbuhan kredit yang sehat dan berkualitas. Pemantauan secara aktif terhadap kredit yang berpotensi bermasalah dilakukan secara berkelanjutan, didukung oleh penerapan sistem manajemen risiko yang komprehensif melalui penetapan profil risiko dan langkah mitigasi yang memadai. Dengan demikian, potensi dampak negatif di masa mendatang dapat diminimalkan secara efektif.

Penilaian Manajemen atas Faktor-Faktor yang Berpengaruh terhadap Kelangsungan Usaha

Manajemen Perseroan secara berkala melakukan penilaian menyeluruh atas kelangsungan usaha serta mengambil langkah perbaikan dan penyempurnaan yang diperlukan apabila terdapat indikasi risiko yang berpotensi mengganggu keberlangsungan operasional Bank. Hingga laporan tahunan dan laporan keberlanjutan tahun 2025 ini disusun dan diterbitkan, tidak terdapat temuan terkait ketidakpastian material yang dapat menimbulkan keraguan signifikan atas kemampuan Perseroan dalam mempertahankan kelangsungan usahanya.

Potentially Significant Factors Affecting Business Continuity

Throughout 2025, the Company did not identify any factors that could potentially have a significant impact on business continuity. Nevertheless, the Company remains vigilant regarding various external challenges, particularly global macroeconomic dynamics that are still marked by uncertainty.

In addressing these conditions, the Company closely monitors the growth trends in the banking industry's credit portfolio while upholding the principles of prudence and selectivity in credit disbursement. This approach is implemented to ensure the sustainable maintenance of asset quality.

The Company is also committed to continuously improving credit approval policy standards to foster healthy and high-quality credit growth. Active monitoring of potentially problematic loans is conducted on an ongoing basis, supported by the implementation of a comprehensive risk management system through the establishment of risk profiles and adequate mitigation measures. Thus, the potential for negative impacts in the future can be effectively minimized.

Management's Assessment of Factors Affecting Business Continuity

The Company's management periodically conducts a comprehensive assessment of business continuity and takes necessary corrective and improvement measures if there are indications of risks that could potentially disrupt the Bank's operational continuity. As of the preparation and publication of this 2025 annual report and sustainability report, there were no findings regarding material uncertainties that could raise significant doubts about the Company's ability to maintain its business continuity.

Kinerja Perseroan yang terus menunjukkan perkembangan positif hingga tahun 2025 menjadi landasan optimisme bahwa Bank Neo Commerce berada pada jalur yang tepat untuk terus bertumbuh secara berkelanjutan. Dengan pertumbuhan bisnis yang konsisten, Perseroan mampu memperkuat posisinya di industri perbankan digital sekaligus menciptakan nilai jangka panjang bagi para pemangku kepentingan.

The Company's performance, which continues to show positive development through 2025, serves as a foundation for optimism that Bank Neo Commerce is on the right track to continue growing sustainably. With consistent business growth, the Company is able to strengthen its position in the digital banking industry while creating long-term value for stakeholders.

Dalam proses penyusunan rencana strategis, Perseroan juga secara rutin melakukan evaluasi dan penilaian atas kemampuan pencapaian target usaha, guna memastikan kesinambungan bisnis tetap terjaga. Penilaian tersebut didukung oleh pengembangan dan pengelolaan risiko yang terintegrasi sebagai bagian dari penguatan penerapan manajemen risiko dan pengendalian internal. Hal ini memungkinkan Perseroan memiliki sistem peringatan dini atas potensi risiko maupun kejadian yang dapat mempengaruhi kinerja.

In the process of formulating strategic plans, the Company also routinely evaluates and assesses its ability to achieve business targets to ensure business continuity is maintained. This assessment is supported by integrated risk development and management as part of strengthening the implementation of risk management and internal controls. This enables the Company to have an early warning system for potential risks or events that could impact performance.

Selain itu, risiko kepatuhan dikelola dengan mengacu pada tingkat risiko yang dapat diterima (*risk appetite*) oleh Bank, sehingga pencapaian sasaran usaha tetap sejalan dengan prinsip kehati-hatian.

In addition, compliance risks are managed in accordance with the Bank's acceptable risk level (risk appetite), ensuring that the achievement of business objectives remains aligned with the principle of prudence.

Asumsi yang Digunakan Manajemen dalam Melakukan Penilaian

Dalam melakukan penilaian atas kelangsungan usaha, manajemen Perseroan mempertimbangkan sejumlah faktor utama, antara lain:

1. Kinerja keuangan Perseroan;
2. Kondisi dan kecukupan likuiditas;
3. Tingkat solvabilitas;
4. Potensi permasalahan internal; dan
5. Perkara hukum yang dapat berdampak terhadap operasional Perseroan.

Keseluruhan faktor tersebut menjadi dasar dalam memastikan bahwa Perseroan memiliki ketahanan yang memadai untuk menjalankan usaha secara berkelanjutan di tengah dinamika lingkungan bisnis yang terus berkembang.

Assumptions Used by Management in Conducting the Assessment

In assessing business continuity, the Company's management considers several key factors, including:

1. The Company's financial performance;
2. Liquidity conditions and adequacy;
3. Solvency levels;
4. Potential internal issues; and
5. Legal matters that could impact the Company's operations.

All of these factors forbecome a foundation to ensure that the Company possesses sufficient resilience to conduct business sustainably amidst the ever-evolving dynamics of the business environment.



Permodalan & Manajemen Risiko

Capital & Risk Management



Permodalan
Capital



Dalam menjaga kesinambungan usaha, Perseroan secara konsisten menerapkan pengelolaan permodalan dan manajemen risiko yang terukur dan andal. Tujuan utama dari pengelolaan struktur modal adalah memastikan kecukupan modal dalam menghadapi berbagai risiko inheren yang melekat pada kegiatan usaha, tanpa mengesampingkan upaya optimalisasi nilai bagi pemegang saham serta pemenuhan ketentuan regulator.

Sebagai acuan, Perseroan telah menetapkan strategi permodalan yang mencakup kebijakan pengeluaran modal, sumber pembiayaan, serta pengelolaan aktivitas *treasury*. Perseroan meyakini bahwa penerapan strategi permodalan yang tepat akan mendukung peningkatan profitabilitas, pertumbuhan usaha yang sehat, serta memperkuat daya saing di tengah intensitas persaingan industri perbankan.

In maintaining business continuity, the Company consistently implements measured and reliable capital management and risk management practices. The primary objective of capital structure management is to ensure sufficient capital to address the various inherent risks associated with business operations, without neglecting efforts to optimize value for shareholders and comply with regulatory requirements.

As a reference, the Company has established a capital strategy that encompasses capital expenditure policies, funding sources, and treasury management. The Company believes that the implementation of an appropriate capital strategy will support increased profitability, healthy business growth, and strengthen competitiveness amid the intense competition in the banking industry.

Implementasi strategi permodalan dilakukan secara bertahap melalui berbagai langkah, antara lain penawaran umum terbatas (*right issue*), penguatan modal melalui alokasi laba ditahan (*internal growth*), keterlibatan investor strategis, hingga penerbitan obligasi konversi. Dengan pendekatan tersebut, Perseroan diharapkan memiliki fondasi permodalan yang semakin kuat untuk mendukung pengembangan produk dan layanan, sekaligus memperkuat pengelolaan risiko demi keberlanjutan usaha jangka panjang.

Struktur Permodalan

Pada akhir tahun 2025, struktur permodalan Perseroan berada pada tingkat yang solid, tercermin dari Rasio Kewajiban Penyediaan Modal Minimum (KPMM) sebesar 49,07% dengan rasio modal inti (*Tier 1*) terhadap modal pelengkap mencapai 6.629,22%. Capaian tersebut menunjukkan bahwa Perseroan telah memenuhi ketentuan minimum permodalan yang ditetapkan Otoritas Jasa Keuangan (OJK), yaitu sebesar 10% hingga kurang dari 11% dari Aset Tertimbang Menurut Risiko (ATMR) bagi Bank dengan Profil Risiko peringkat 3 per 31 Desember 2025.

Perseroan terus menjaga struktur permodalan pada tingkat yang memadai. Kinerja ini mencerminkan komitmen manajemen dalam memastikan permodalan tetap kuat guna mendukung pertumbuhan bisnis dan keberlangsungan usaha secara berkelanjutan.

Kecukupan Permodalan

Pengelolaan kecukupan modal Perseroan mengacu pada peraturan OJK terkait KPMM Bank Umum. Dalam perhitungannya, Perseroan menggunakan pendekatan standar (*standardized approach*) untuk ATMR Risiko Kredit, Risiko Operasional, dan ATMR Risiko Pasar.

Per 31 Desember 2025, total modal Perseroan tercatat sebesar Rp4.088,40 miliar, meningkat Rp687 miliar atau 20,21% dibandingkan tahun sebelumnya sebesar Rp3.401,03 miliar.

The implementation of the capital strategy is carried out gradually through various stages, including a rights offering (right issue), capital strengthening through the allocation of retained earnings (internal growth), the involvement of strategic investors, and the issuance of convertible bonds. With this approach, the Company is expected to have a stronger capital foundation to support product and service development, while simultaneously strengthening risk management for long-term business sustainability.

Capital Structure

At the end of 2025, the Company's capital structure was solid, as reflected in the Minimum Capital Adequacy Ratio (CAR) of 49.07%, with the Tier 1 capital ratio to supplementary capital reaching 6,629.22%. These achievements demonstrate that the Company has met the minimum capital requirements set by the Financial Services Authority (OJK), which is 10% to less than 11% of Risk-Weighted Assets (RWA) for banks with a Risk Profile rating of 3 as of December 31, 2025.

The Company continues to maintain its capital structure at an adequate level. This performance reflects management's commitment to ensuring capital remains strong to support business growth and sustainable operations.

Capital Adequacy

The Company's capital adequacy management adheres to OJK regulations regarding the Capital Adequacy Ratio (CAR) for Commercial Banks. In its calculations, the Company uses the standardized approach for Credit Risk RWA, Operational Risk, and Market Risk RWA.

As of December 31, 2025, the Company's total capital stood at Rp4,088.40 billion, increased by Rp687 billion or 20.21% compared to the previous year of Rp3,401.03 billion.

Pengungkapan Eksposur Risiko dan Penerapan Manajemen Risiko

Disclosure of Risk Exposure and Implementation of Risk Management

Penerapan Manajemen Risiko secara Umum

Sebagai institusi perbankan, Perseroan menerapkan manajemen risiko dengan mengacu pada POJK No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum serta POJK No. 4/POJK.03/2016 tentang Penilaian Tingkat Kesehatan Bank Umum.

Penerapan manajemen risiko dilakukan secara menyeluruh melalui proses identifikasi, pengukuran, pengendalian, dan pemantauan risiko yang terintegrasi dengan seluruh aktivitas operasional Perseroan.

Pengawasan Aktif Direksi dan Dewan Komisaris

Direksi dan Dewan Komisaris memiliki tanggung jawab dalam memastikan efektivitas penerapan manajemen risiko sesuai dengan karakteristik, kompleksitas, dan profil risiko Perseroan. Direksi secara aktif mengkoordinasikan pengelolaan risiko melalui berbagai forum, antara lain rapat *Asset Liability Committee* (ALCO), rapat Direksi, rapat penyelesaian kredit bermasalah, rapat Komite Produk, Komite Manajemen Risiko, serta Komite Kebijakan Perkreditan Bank.

Dewan Komisaris menjalankan fungsi pengawasan terhadap kebijakan strategis, sistem pengendalian internal, kepatuhan terhadap regulasi, kebijakan investasi dan divestasi, kebijakan SDM, penerapan program anti pencucian uang dan pencegahan pendanaan terorisme, serta penerapan prinsip tata kelola perusahaan yang baik.

Selama tahun 2025, rapat Komite Manajemen Risiko dilaksanakan sebanyak 4 (empat) kali dan rapat Komite Pemantau Risiko sebanyak 12 (dua belas) kali, sebagai bagian dari upaya pemantauan berkelanjutan terhadap profil risiko dan tingkat kesehatan Bank.

General Implementation of Risk Management

As a banking institution, the Company implements risk management in accordance with POJK No. 18/POJK.03/2016 regarding the Implementation of Risk Management for Commercial Banks and POJK No. 4/POJK.03/2016 regarding the Assessment of the Health Status of Commercial Banks.

Risk management is implemented comprehensively through an integrated process of risk identification, measurement, control, and monitoring across all of the Company's operational activities.

Active Supervision by the Board of Directors and Board of Commissioners

The Board of Directors and the Board of Commissioners are responsible for ensuring the effectiveness of risk management implementation in accordance with the Company's characteristics, complexity, and risk profile. The Board of Directors actively coordinates risk management through various forums, including Asset Liability Committee (ALCO) meetings, Board of Directors meetings, meetings on the resolution of non-performing loans, Product Committee meetings, Risk Management Committee meetings, and the Bank's Credit Policy Committee meetings.

The Board of Commissioners performs its supervisory function regarding strategic policies, internal control systems, regulatory compliance, investment and divestment policies, human resources policies, the implementation of anti-money laundering and counter-terrorism financing programs, as well as the application of good corporate governance principles.

Throughout 2025, the Risk Management Committee held 4 (four) meetings and the Risk Oversight Committee held 12 (twelve) meetings, as part of ongoing efforts to monitor the Bank's risk profile and financial health.

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit

Perseroan telah memiliki kebijakan, prosedur, dan penetapan limit risiko yang selaras dengan strategi bisnis. Penyempurnaan dilakukan secara berkelanjutan untuk mendukung transformasi Perseroan sebagai bank berbasis layanan digital, antara lain melalui penguatan teknologi dan manajemen data, penerapan *Risk Acceptance Criteria* dan *Credit Scoring*, serta pelaksanaan *back testing* oleh unit internal independen guna memastikan prinsip kehati-hatian tetap terjaga.

Selain itu, Perseroan secara rutin melaksanakan *stress testing* berdasarkan berbagai skenario makroekonomi untuk mengantisipasi potensi kondisi yang dapat mempengaruhi kinerja di masa depan. Penetapan *Risk Appetite Statement* dan *Risk Tolerance* dievaluasi secara berkala agar tetap relevan dengan kebijakan manajemen risiko yang berlaku.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko serta Sistem Informasi Manajemen Risiko

Proses Identifikasi dan Pengukuran Risiko

Perseroan melakukan identifikasi dan pengukuran risiko atas seluruh produk dan aktivitas usaha, baik yang bersifat eksisting maupun baru. Proses ini dilakukan oleh masing-masing unit kerja melalui analisis sumber risiko, pelaksanaan *Risk and Control Self-Assessment* (RCSA), penilaian kecukupan pengelolaan dan penerapan kontrol risiko, pemantauan indikator risiko (KRI), serta pencatatan kejadian risiko melalui *Risk Loss Event Database* (RLED).

Pengukuran risiko mencakup aktivitas perkreditan, *treasury*, pendanaan, operasional, proses penyelesaian transaksi, serta layanan perbankan lainnya.

Adequacy of Policies, Procedures, and Risk Limits

The Company has policies, procedures, and risk limit settings aligned with its business strategy. Continuous improvements are made to support the Company's transformation into a digital-service-based bank, including through strengthening technology and data management, implementing Risk Acceptance Criteria and Credit Scoring, and conducting back testing by an independent internal unit to ensure the principle of prudence is maintained.

Additionally, the Company routinely conducts stress testing based on various macroeconomic scenarios to anticipate potential conditions that could affect future performance. The Risk Appetite Statement and Risk Tolerance are periodically evaluated to ensure they remain relevant to the applicable risk management policies.

Adequacy of Risk Identification, Measurement, Monitoring, and Control Processes, as well as Risk Management Information Systems

Risk Identification and Measurement Processes

The Company identifies and measures risks across all products and business activities, whether existing or new. This process is carried out by each work unit through an analysis on risk causes the implementation of Risk and Control Self-Assessment (RCSA), an assessment of the adequacy of risk management and the application of risk controls, monitoring of risk indicators (KRI), and the recording of risk events through the Risk Loss Event Database (RLED).

Risk measurement covers credit activities, treasury, funding, operations, transaction settlement processes, and other banking services.

Proses Pemantauan Risiko

Pemantauan risiko dilakukan terhadap eksposur risiko, kesesuaian dengan *risk appetite*, kepatuhan terhadap regulasi dan limit internal, konsistensi penerapan kebijakan, serta pemanfaatan hasil *stress testing*. Pemantauan ini dilaksanakan oleh unit kerja terkait dan unit independen.

Evaluasi terhadap model pengukuran risiko dilakukan melalui *back testing* untuk memastikan akurasi model dibandingkan dengan kondisi aktual. *Stress test* juga dilakukan secara berkala guna mengukur ketahanan Perseroan terhadap perubahan kondisi makroekonomi.

Sistem Informasi Manajemen dan Pengendalian Internal

Perseroan secara berkelanjutan menyempurnakan sistem informasi manajemen untuk memastikan integrasi data dan pelaporan yang efektif. Sistem ini memungkinkan Dewan Komisaris, Direksi, dan unit kerja terkait memperoleh informasi yang tepat waktu sebagai dasar pengambilan keputusan dan perbaikan berkelanjutan.

Struktur organisasi Perseroan dirancang dengan pemisahan yang jelas antara fungsi operasional, fungsi pengawasan, dan fungsi pengendalian. Pemisahan ini mendukung efektivitas sistem pengendalian internal yang dilaksanakan oleh SKAI.

Sebagai bagian dari struktur manajemen risiko, Perseroan memiliki Satuan Kerja Manajemen Risiko (SKMR) yang dijalankan melalui Divisi Risk Management, dengan pelaporan melalui Komite Manajemen Risiko. Dewan Komisaris menjalankan fungsi pengawasan melalui Komite Pemantau Risiko sesuai ketentuan yang berlaku.

Risk Appetite Statement dan *Risk Tolerance* ditetapkan sebagai pedoman pengelolaan risiko untuk memastikan pencapaian rencana bisnis tetap sejalan dengan prinsip kehati-hatian dan praktik *Good Corporate Governance*.

Selain itu, Perseroan telah memiliki sistem informasi manajemen risiko yang terintegrasi secara *Bankwide* yang bertujuan untuk meningkatkan penerapan manajemen risiko melalui sistem dalam menunjang pemeliharaan *risk register*, pemantauan indikator risiko dan pelaporan kejadian, serta penindaklanjutan risiko operasional.

Risk Monitoring Process

Risk monitoring is conducted on risk exposure, alignment with risk appetite, compliance with regulations and internal limits, consistency in policy implementation, and the utilization of stress testing results. This monitoring is carried out by relevant business units and independent units.

Evaluation of the risk measurement model is conducted through back testing to ensure the model's accuracy against actual conditions. Stress tests are also conducted periodically to measure the Company's resilience to changes in macroeconomic conditions.

Information Management and Internal Control Systems

The Company continuously improves its information management systems to ensure effective data integration and reporting. These systems enable the Board of Commissioners, the Board of Directors, and relevant business units to obtain timely information as a basis for decision-making and continuous improvement.

The Company's organizational structure is designed with a clear separation between operational functions, supervisory functions, and control functions. This separation supports the effectiveness of the internal control system implemented by SKAI.

As part of the risk management structure, the Company has a Risk Management Unit (SKMR) operated through the Risk Management Division, reporting to the Risk Management Committee. The Board of Commissioners performs its supervisory function through the Risk Oversight Committee in accordance with applicable regulations.

The Risk Appetite Statement and Risk Tolerance are established as risk management guidelines to ensure that the achievement of business plans remains aligned with the principle of prudence and Good Corporate Governance practices.

Additionally, the Company has an integrated risk management information system across the entire bank, which aims to improve the implementation of risk management through the system to support the maintenance of the risk register, monitoring of risk indicators and incident reporting, as well as the follow-up of operational risks.

Penerapan Manajemen Risiko pada 8 (Delapan) Risiko Bank

Perseroan menerapkan manajemen risiko secara menyeluruh atas 8 (delapan) jenis risiko utama sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum, yang meliputi:
1. Risiko Kredit;
2. Risiko Pasar;
3. Risiko Likuiditas;
4. Risiko Operasional;
5. Risiko Hukum;
6. Risiko Strategis;
7. Risiko Kepatuhan; dan
8. Risiko Reputasi.

Dalam pelaksanaannya, Perseroan secara berkala melakukan penilaian atas seluruh jenis risiko tersebut. Hasil penilaian dituangkan dalam profil risiko yang menggambarkan peringkat risiko masing-masing jenis risiko maupun peringkat risiko komposit secara keseluruhan. Penilaian dilakukan dengan mempertimbangkan tingkat risiko inheren serta kualitas penerapan manajemen risiko yang telah dijalankan oleh Perseroan.

Risiko Kredit

Risiko kredit merupakan risiko yang timbul akibat potensi kegagalan pihak lawan (*counterparty*) dalam memenuhi kewajibannya kepada Perseroan. Oleh karena itu, pengelolaan risiko kredit difokuskan pada penguatan fondasi proses perkreditan secara menyeluruh.

Perseroan telah menetapkan struktur organisasi yang secara jelas memisahkan fungsi pengajuan kredit, penilaian agunan, pemberian opini risiko oleh Divisi Risk Management, serta fungsi persetujuan kredit. Kebijakan dan prosedur perkreditan senantiasa disempurnakan, termasuk pengaturan Limit Kewenangan Memutus Kredit dan Aktivitas Kredit Lainnya yang menjunjung tinggi prinsip kehati-hatian.

Proses persetujuan kredit dilakukan secara transparan dan berjenjang melalui Komite Kredit. Perseroan juga memastikan pembentukan Cadangan Kerugian Penurunan Nilai (CKPN) yang memadai serta melaksanakan pengawasan kredit secara berkelanjutan guna mendeteksi potensi penurunan kualitas kredit secara dini melalui pemantauan portofolio kredit secara berkala.

Application of Risk Management to the Bank's 8 (Eight) Risk Categories

The Company implements comprehensive risk management across 8 (eight) primary risk categories as stipulated in Financial Services Authority Regulation No. 18/POJK.03/2016 on the Application of Risk Management for Commercial Banks, which include:
1. Credit Risk;
2. Market Risk;
3. Liquidity Risk;
4. Operational Risk;
5. Legal Risk;
6. Strategic Risk;
7. Compliance Risk; and
8. Reputational Risk.

In its implementation, the Company periodically assesses all of these risk types. The assessment results are documented in the risk profile report that describes the risk rating for each type of risk as well as the overall composite risk rating. The assessment is conducted by considering the level of inherent risk as well as the quality of the risk management implementation carried out by the Company.

Credit Risk

Credit risk is the risk arising from the potential failure of a counterparty to fulfill its obligations to the Company. Therefore, credit risk management is focused on strengthening the overall foundation of the credit process.

The Company has established an organizational structure that clearly separates the functions of credit application, credit administration, risk opinion provided by the Risk Management Division, and credit approval. Credit policies and procedures are continuously refined, including regulations on Authorization Limits for Credit Decisions and Other Credit Activities that uphold the principle of prudence.

The credit approval process is conducted transparently and in stages through the Credit Committee. The Company also ensures the establishment of adequate Allowance for Impairment Losses (CKPN) and conducts continuous credit monitoring to detect potential credit quality deterioration early through periodic credit portfolio monitoring.

Untuk mengendalikan risiko konsentrasi kredit, Perseroan menetapkan batasan (*limit*) yang disesuaikan dengan *risk appetite* Bank dan dievaluasi sekurang-kurangnya satu kali dalam setahun.

To manage credit concentration risk, the Company sets limits aligned with the Bank's risk appetite and evaluates them at least once a year.

Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Kredit Perseroan secara komposit berada pada peringkat *Moderate*.

Based on the results of the self-assessment as of December 31, 2025, the Company's composite credit risk is rated as Moderate.

Risiko Pasar

Market Risk

Risiko pasar merupakan risiko yang timbul akibat perubahan variabel pasar, terutama suku bunga. Mengingat Perseroan bukan merupakan bank devisa, eksposur risiko pasar yang dihadapi terbatas pada risiko suku bunga. Risiko ini melekat pada aktivitas perkreditan, kegiatan *treasury*, serta aktivitas pendanaan.

Market risk is the risk arising from changes in market variables, particularly interest rates. Since the Company is not a foreign exchange bank, its market risk exposure is limited to interest rate risk. This risk is inherent in lending activities, treasury operations, and funding activities.

Pengelolaan risiko pasar diatur dalam Kebijakan Manajemen Risiko Pasar yang ditetapkan oleh Direksi dan dimonitor melalui Komite Pemantau Risiko serta dibahas secara rutin dalam rapat *Asset and Liability Committee* (ALCO).

Market risk management is governed by the Market Risk Management Policy established by the Board of Directors, monitored by the Risk Oversight Committee, and discussed regularly at Asset and Liability Committee (ALCO) meetings.

Manajemen Risiko Pasar

Market Risk Management

Pengelolaan risiko pasar dilakukan melalui proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko berdasarkan analisis struktur neraca, perkembangan suku bunga pasar, serta proyeksi pergerakan suku bunga ke depan.

Market risk management is conducted through a process of risk identification, measurement, monitoring, and control based on analysis of the balance sheet structure, market interest rate trends, and projections of future interest rate movements.

Dalam tahap identifikasi, Perseroan melakukan analisis atas produk dan aktivitas *treasury* untuk mengidentifikasi risiko pasar yang melekat. Risiko tersebut dipertimbangkan dan dimitigasi sebelum maupun setelah peluncuran produk. Untuk mendukung proses ini, Perseroan memiliki kebijakan Manajemen Risiko Pasar dan Kebijakan Tresuri yang mengatur mekanisme pengajuan, kaji ulang, dan persetujuan produk atau aktivitas baru.

During the identification phase, the Company analyzes its products and treasury activities to identify inherent market risks. These risks are assessed and mitigated both before and after product launch. To support this process, the Company maintains Market Risk management Policy and Treasury Policy that governs the mechanisms for proposing, reviewing, and approving new products or activities.

Risiko Pasar – *Trading Book*

Market Risk – Trading Book

Untuk keperluan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM), Perseroan menggunakan Metode Standar sesuai SEOJK No. 23/SEOJK.03/2022 tentang Perhitungan ATMR untuk Risiko Pasar. Hingga 31 Desember 2025, Perseroan belum memiliki aktivitas maupun produk yang dikategorikan sebagai *Trading Book*, sehingga tidak terdapat eksposur risiko pasar dari *Trading Book*. Dengan demikian, ATMR Risiko Pasar pada 31 Desember 2025 dan 2024 tercatat nihil.

For the calculation of the Capital Adequacy Ratio (CAR), the Company uses the Standard Method in accordance with SEOJK No. 23/SEOJK.03/2022 regarding the Calculation of RWA for Market Risk. As of December 31, 2025, the Company has no activities or products categorized as the Trading Book, so there is no market risk exposure from the Trading Book. Consequently, the RWA for Market Risk as of December 31, 2025, and 2024 is recorded as zero.

Risiko Pasar – *Banking Book*

Pengelolaan risiko pasar pada *Banking Book* dilakukan melalui analisis kesenjangan (*gap*) antara *Rate Sensitive Assets* (RSA) dan *Rate Sensitive Liabilities* (RSL) yang berpotensi mempengaruhi pendapatan dan nilai ekonomis modal Bank.

Pengukuran Risiko Suku Bunga dalam *Banking Book* (*Interest Rate Risk in the Banking Book/ IRRBB*) mengacu pada SEOJK No. 12/SEOJK.03/2018. Perseroan melakukan penilaian *mark to market* berdasarkan harga pasar setiap akhir hari serta memantau eksposur risiko pasar secara harian untuk memastikan eksposur tetap berada dalam batas *risk appetite* yang ditetapkan Direksi dan Dewan Komisaris.

Pengukuran dan pemantauan risiko pasar juga mengacu pada parameter dalam POJK No. 4/ POJK.03/2016 dan SEOJK No. 14/SEOJK.03/2017 terkait penilaian tingkat kesehatan bank.

Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Pasar Perseroan berada pada peringkat *Low.*

Risiko Likuiditas

Risiko likuiditas merupakan potensi kerugian akibat ketidakmampuan Perseroan memenuhi kewajiban yang jatuh tempo, baik dari arus kas maupun pemanfaatan aset likuid berkualitas tinggi tanpa mengganggu operasional dan kondisi keuangan Bank.

Pengelolaan likuiditas dilakukan melalui pengendalian likuiditas harian oleh Divisi Treasury serta pengelolaan likuiditas jangka waktu tertentu melalui ALCO.

Manajemen Risiko Likuiditas

Perseroan telah memiliki Kebijakan Manajemen Risiko Likuiditas dan Rencana Pendanaan Darurat. Unit Kerja Manajemen Risiko secara berkala melakukan identifikasi, pengukuran, pemantauan, dan pengendalian risiko likuiditas melalui analisis komposisi aset, liabilitas, transaksi rekening administratif, tingkat konsentrasi aset dan liabilitas, kerentanan kebutuhan pendanaan, serta akses terhadap sumber pendanaan.

Market Risk – Banking Book

Market risk management in the Banking Book is conducted through gap analysis between Rate Sensitive Assets (RSA) and Rate Sensitive Liabilities (RSL) that could potentially affect the Bank's income and the economic value of its capital.

The measurement of Interest Rate Risk in the Banking Book (IRRBB) is in accordance with SEOJK No. 12/SEOJK.03/2018. The Company performs mark-to-market valuations based on market prices at the end of each day and monitors market risk exposure on a daily basis to ensure that exposure remains within the risk appetite limits set by the Board of Directors and the Board of Commissioners.

Market risk measurement and monitoring also adhere to the parameters in POJK No. 4/ POJK.03/2016 and SEOJK No. 14/SEOJK.03/2017 regarding the assessment of the Bank's soundness.

Based on the results of the self-assessment as of December 31, 2025, the Company's Market Risk is rated Low.

Liquidity Risk

Liquidity risk is the potential for loss resulting from the Company's inability to meet maturing obligations, whether through cash flows or the utilization of high-quality liquid assets, without disrupting the Bank's operations and financial condition.

Liquidity management is conducted through daily liquidity control by the Treasury Division and the management of liquidity over specific time periods and oversee by ALCO.

Liquidity Risk Management

The Company has established a Liquidity Risk Management Policy and an Contingency Funding Plan. The Risk Management Unit periodically identifies, measures, monitors, and controls liquidity risk through analysis of asset and liability composition, administrative account transactions, asset and liability concentration levels, funding requirement vulnerabilities, and access to funding sources.

Pemantauan risiko likuiditas juga dilakukan melalui indikator peringatan dini, antara lain pergerakan harga saham Perseroan, pencairan deposito sebelum jatuh tempo, serta faktor eksternal seperti kondisi likuiditas pasar dan situasi makroekonomi.

Liquidity risk monitoring is also conducted through early warning indicators, including movements in the Company's stock prices, early withdrawal of deposits before maturity, and external factors such as market liquidity conditions and the macroeconomic situation.

Eksposur risiko likuiditas dipantau berdasarkan *risk appetite* Bank, dan hasil pengelolaannya dilaporkan kepada ALCO secara bulanan.

Liquidity risk exposure is monitored based on the Bank's risk appetite, and the results of its management are reported to ALCO on a monthly basis.

Pengukuran Risiko Likuiditas

Pengukuran risiko likuiditas dilakukan dengan menetapkan limit dan parameter risiko sesuai tingkat *risk appetite*, antara lain melalui analisis *liquidity gap*, skenario *stress testing*, serta pemantauan *Liquidity Coverage Ratio* (LCR) dan *Net Stable Funding Ratio* (NSFR).

Liquidity Risk Measurement

Liquidity risk measurement is conducted by setting risk limits and parameters in accordance with the level of risk appetite, including through liquidity gap analysis, stress testing scenarios, and monitoring of the Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR).

Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Likuiditas Perseroan secara komposit berada pada peringkat *Low to Moderate*.

Based on the results of the self-assessment as of December 31, 2025, the Company's composite liquidity risk is rated as Low to Moderate.

Risiko Operasional

Operational Risk

Risiko operasional merupakan potensi kerugian yang dapat timbul akibat ketidakcukupan atau tidak berfungsinya proses internal, kesalahan manusia, kegagalan sistem, maupun kejadian eksternal yang berdampak pada kegiatan operasional Perseroan.

Operational risk is the potential for loss arising from inadequate or malfunctioning internal processes, human error, system failures, or external events that impact the Company's operational activities.

Dalam pengelolaannya, setiap unit kerja bertanggung jawab atas risiko operasional yang melekat pada aktivitas sehari-hari dengan berpedoman pada kebijakan serta prosedur internal dan eksternal yang berlaku. Pengelolaan risiko operasional juga mencakup aspek pengembangan produk, keandalan sistem teknologi informasi, pengelolaan sumber daya manusia, serta antisipasi terhadap kejadian eksternal guna mencegah potensi gangguan operasional.

In its management, each work unit is responsible for the operational risks inherent in daily activities, guided by applicable internal and external policies and procedures. Operational risk management also encompasses product development, the reliability of information technology systems, human resource management, and preparedness for external events to prevent potential operational disruptions.

Untuk mendukung proses pemantauan, Perseroan menggunakan perangkat manajemen risiko operasional seperti *Risk Control Self-Assessment* (RCSA), *Key Risk Indicator* (KRI) serta *Risk Loss Event Database* (RLED). Selain itu, Perseroan telah memiliki sistem informasi manajemen risiko yang terintegrasi secara *Bankwide* yang bertujuan untuk meningkatkan penerapan manajemen risiko melalui sistem dalam menunjang pemeliharaan *risk register*, pemantauan indikator risiko dan pelaporan kejadian, serta penindaklanjutan risiko operasional.

To support the monitoring process, the Company utilizes operational risk management tools such as the Risk Control Self-Assessment (RCSA), Key Risk Indicators (KRI), and Risk Loss Event Database (RLED). Additionally, the Company has an integrated risk management information system across the entire bank aimed at enhancing risk management implementation through the system to support the maintenance of the risk register, monitoring of risk indicators, incident reporting, and follow-up on operational risks.

Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Operasional Perseroan secara komposit berada pada peringkat *Moderate to High*.

Risiko Hukum

Risiko hukum merupakan potensi kerugian yang bersumber dari tuntutan hukum maupun kelemahan aspek yuridis. Perseroan mengelola risiko ini dengan memastikan seluruh aktivitas dan hubungan usaha dijalankan berdasarkan ketentuan hukum yang berlaku, sehingga kepentingan Perseroan terlindungi secara hukum.

Pengelolaan Risiko Hukum dilakukan oleh Divisi Legal beserta fungsi Litigasi yang menjalankan pendekatan preventif dan proaktif terhadap seluruh aktivitas bisnis. Upaya ini bertujuan untuk meminimalkan potensi dampak finansial yang signifikan akibat permasalahan hukum.

Unit kerja terkait melakukan pengukuran, penilaian, dan pemantauan risiko hukum secara menyeluruh melalui analisis mendalam terhadap potensi litigasi, kelemahan perikatan, serta perubahan atau ketiadaan regulasi yang relevan atas setiap produk maupun transaksi Perseroan. Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Hukum Perseroan berada pada peringkat *Low to Moderate*.

Risiko Stratejik

Risiko stratejik adalah potensi kerugian yang timbul akibat ketidaktepatan dalam penetapan dan/atau pelaksanaan keputusan strategis, serta kegagalan dalam mengantisipasi perubahan lingkungan bisnis.

Pengelolaan risiko stratejik dilakukan melalui kebijakan dan strategi Perseroan yang dirumuskan dalam Rencana Bisnis Bank dan disampaikan setiap tahun kepada Otoritas Jasa Keuangan untuk memperoleh persetujuan.

Perseroan secara berkala melakukan pengukuran, penilaian, dan pemantauan risiko strategis melalui evaluasi keselarasan sasaran strategis dengan dinamika lingkungan bisnis, posisi Perseroan di pasar, tingkat efisiensi operasional, kondisi makroekonomi, serta intensitas persaingan industri.

Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Strategis Perseroan secara komposit dinilai *Low to Moderate*.

Based on the results of the self-assessment as of December 31, 2025, the Company's composite operational risk is rated as Moderate to High.

Legal Risk

Legal risk refers to potential losses arising from legal claims or weaknesses in legal aspects. The Company manages this risk by ensuring all business activities and relationships are conducted in accordance with applicable laws, thereby safeguarding the Company's interests legally.

Legal risk management is carried out by the Legal Division along with the Litigation function, which adopts a preventive and proactive approach toward all business activities. These efforts aim to minimize the potential for significant financial impact resulting from legal issues.

Relevant business units conduct comprehensive measurement, assessment, and monitoring of legal risks through in-depth analysis of potential litigation, contractual weaknesses, and changes or the absence of relevant regulations regarding each of the Company's products or transactions. Based on the results of the self-assessment as of December 31, 2025, the Company's Legal Risk is rated Low to Moderate.

Strategic Risk

Strategic risk is the potential for loss arising from inaccuracies in the formulation and/or implementation of strategic decisions, as well as failure to anticipate changes in the business environment.

Strategic risk management is conducted through the Company's policies and strategies, which are formulated in the Bank's Business Plan and submitted annually to the Financial Services Authority for approval.

The Company periodically measures, assesses, and monitors strategic risks by evaluating the alignment of strategic objectives with business environment dynamics, the Company's market position, operational efficiency levels, macroeconomic conditions, and the intensity of industry competition.

Based on the results of the self-assessment as of December 31, 2025, the Company's composite Strategic Risk is assessed as Low to Moderate.

Risiko Kepatuhan

Risiko Kepatuhan merupakan potensi kerugian yang muncul akibat ketidakpatuhan Perseroan terhadap peraturan perundang-undangan dan ketentuan yang berlaku.

Divisi Kepatuhan berperan memastikan bahwa kebijakan, sistem, prosedur, serta seluruh kegiatan usaha Perseroan telah sejalan dengan ketentuan regulator dan peraturan hukum. Divisi ini juga memastikan pemenuhan komitmen Perseroan kepada regulator lain yang berwenang serta mendorong penerapan Budaya Kepatuhan di seluruh tingkatan organisasi.

Pemantauan Risiko Kepatuhan dilakukan secara berkala melalui pengukuran dan penilaian terhadap jenis, tingkat materialitas, serta frekuensi pelanggaran yang terjadi, sebagai dasar dalam penguatan pengendalian dan perbaikan berkelanjutan.

Berdasarkan hasil *self-assessment* per 31 Desember 2025, Risiko Kepatuhan Perseroan berada pada peringkat *Moderate*.

Risiko Reputasi

Risiko reputasi merupakan potensi kerugian akibat menurunnya kepercayaan pemangku kepentingan yang disebabkan oleh persepsi negatif terhadap Perseroan.

Pengelolaan risiko ini dilakukan melalui unit yang membawahi fungsi pelayanan dan pengaduan nasabah dengan memastikan setiap keluhan ditangani secara tepat waktu dan responsif. Pendekatan ini menjadi bagian dari komitmen Perseroan dalam memberikan layanan terbaik serta menjaga kepercayaan masyarakat.

Sebagai langkah penguatan, Perseroan secara konsisten melakukan pemantauan dan perbaikan proses internal untuk menekan tingkat pengaduan, serta melakukan *media counter* guna memastikan pemberitaan negatif dapat dikelola dan diselesaikan secara proporsional agar tidak berdampak lebih luas.

Perseroan telah membentuk unit khusus penanganan pengaduan nasabah yang didukung oleh berbagai divisi terkait guna memastikan proses penanganan dilakukan secara menyeluruh (*end-to-end*). Berdasarkan hasil penilaian mandiri per 31 Desember 2025, Risiko Reputasi Perseroan berada pada peringkat *Low to Moderate*.

Compliance Risk

Compliance Risk refers to the potential for loss arising from the Company's non-compliance with applicable laws, regulations, and provisions.

The Compliance Division is responsible for ensuring that the Company's policies, systems, procedures, and all business activities align with regulatory requirements and legal provisions. This Division also ensures the Company fulfills its commitments to other authorized regulators and promotes the implementation of a Compliance Culture across all organizational levels.

Compliance Risk Monitoring is conducted periodically through the measurement and assessment of the type, materiality level, and frequency of violations that occur, which serves as a foundation to strengthen control and drive continuous improvement.

Based on the results of the self-assessment as of December 31, 2025, the Company's Compliance Risk is rated as Moderate.

Reputational Risk

Reputational risk is the potential for loss resulting from a decline in stakeholder trust caused by negative perceptions of the Company.

This risk is managed through the customer service and complaints unit, which ensures that every complaint is handled in a timely and responsive manner. This approach is part of the Company's commitment to providing the best service and maintaining public trust.

As a strengthening measure, the Company consistently monitors and improves internal processes to reduce complaint rates, and implements media countermeasures to ensure negative coverage is managed and resolved proportionally to prevent broader impact.

The Company has established a dedicated unit for handling customer complaints, supported by various relevant divisions, to ensure the handling process is comprehensive (end-to-end). Based on the results of the self-assessment as of December 31, 2025, the Company's Reputation Risk is rated Low to Moderate.

Penerapan Manajemen Risiko atas Produk dan Aktivitas Baru

Perseroan secara konsisten menerapkan manajemen risiko dalam setiap rencana pengembangan produk dan/atau aktivitas baru sebagai langkah mitigasi terhadap potensi risiko dan kerugian yang dapat timbul di kemudian hari. Pendekatan ini menjadi bagian integral dari proses inovasi Perseroan guna memastikan bahwa setiap produk atau aktivitas yang dikembangkan selaras dengan prinsip kehati-hatian serta ketentuan yang berlaku.

Salah satu mekanisme utama yang diterapkan adalah pengkajian menyeluruh oleh lini kedua Perseroan terhadap proposal dan komponen pengembangan produk atau aktivitas baru. Pengkajian tersebut dilakukan berdasarkan kebijakan internal serta regulasi eksternal yang relevan. Sementara itu, penyusunan konsep dan rencana pengembangan produk atau aktivitas baru dilakukan oleh unit kerja yang memiliki keterkaitan langsung dengan produk atau aktivitas dimaksud. Seluruh rangkaian ini merupakan bagian yang tidak terpisahkan dari tahapan pengembangan produk dan aktivitas baru di Perseroan.

Pelaksanaan pengelolaan risiko atas rencana pengembangan produk dan/atau aktivitas baru mencakup tahapan sebagai berikut:

1. Penetapan produk atau aktivitas baru, yang diusulkan oleh unit pemrakarsa (divisi terkait) dan disampaikan kepada Divisi Kepatuhan, Divisi Risk Management, serta unit kerja terkait lainnya untuk memperoleh opini mengenai kelayakan dan kesesuaian rencana pengembangan.
2. Pelaksanaan *risk assessment* serta permintaan penilaian atas kecukupan pengelolaan risiko kepada unit kerja terkait, termasuk Divisi Kepatuhan, Divisi Risk Management, Divisi Legal, dan unit pendukung lainnya.
3. Pengajuan permohonan persetujuan rencana penerbitan produk atau pelaksanaan aktivitas baru kepada Otoritas Jasa Keuangan dan/atau Bank Indonesia sesuai ketentuan yang berlaku.
4. Pengujian kesiapan sistem dan infrastruktur, guna memastikan produk atau aktivitas baru dapat diimplementasikan secara andal dan aman.
5. Pemenuhan proses perizinan atau persetujuan regulator sesuai regulasi yang berlaku.
6. Pelaporan realisasi penerbitan produk atau pelaksanaan aktivitas baru kepada Otoritas Jasa Keuangan dan/atau Bank Indonesia.

Application of Risk Management for New Products and Activities

The Company consistently applies risk management in every plan for the development of new products and/or activities as a mitigation measure against potential risks and losses that may arise in the future. This approach is an integral part of the Company's innovation process to ensure that every product or activity developed aligns with the principle of prudence and applicable regulations.

One of the primary mechanisms implemented is a comprehensive review conducted by the Company's second line on proposals and components related to the development of new products or activities. This review is conducted in accordance with internal policies and relevant external regulations. Meanwhile, the formulation of concepts and development plans for new products or activities is carried out by the work unit directly involved with the product or activity in question. This entire process is an inseparable part of the stages of developing new products and activities within the Company.

The implementation of risk management for new product and/or activity development plans includes the following stages:

1. Identification of new products or activities, proposed by the initiating unit (relevant division) and submitted to the Compliance Division, Risk Management Division, and other relevant work units to obtain opinions regarding the feasibility and suitability of the development plan.
2. Conducting a risk assessment and requesting an evaluation of the adequacy of risk management from relevant units, including the Compliance Division, Risk Management Division, Legal Division, and other supporting units.
3. Submitting an application for approval of the product launch plan or the implementation of new activities to the Financial Services Authority and/or Bank Indonesia in accordance with applicable regulations.
4. Testing the readiness of systems and infrastructure to ensure that new products or activities can be implemented reliably and securely.
5. Completing the licensing process or obtaining regulatory approval in accordance with applicable regulations.
6. Reporting on the implementation of new product launches or activities to the Financial Services Authority and/or Bank Indonesia.

Laporan Ukuran Utama *(Key Metrics)*
Key Metrics Report

dalam jutaan Rupiah | in million Rupiah

No	Deskripsi Description	Dec-25	Sep-25	Jun-25	Mar-25	Dec-24
	Modal yang Tersedia (nilai) Available Capital (amounts)					
1	Modal Inti Utama (CET1) Common Equity Tier 1 (CET1)	4.027.649	3.943.941	3.670.297	3.504.195	3.325.430
2	Modal Inti (Tier 1) Capital Tier 1	4.027.649	3.943.941	3.670.297	3.504.195	3.325.430
3	Total Modal Total Capital	4.088.405	4.008.061	3.740.817	3.577.568	3.401.033
	Aset Tertimbang Menurut Risiko (nilai) Risk-Weighted Assets (amounts)					
4	Total Aset Tertimbang Menurut Risiko (ATMR) Total Risk Weighted Asset (RWA)	8.331.999	8.577.711	9.063.499	9.988.872	9.634.298
	Rasio Modal berbasis Risiko dalam bentuk persentase dari ATMR Risk-based Capital Ratios as a percentage of RWA					
5	Rasio CET1 (%) Common Equity Tier 1 Ratio (%)	48,34%	45,98%	40,50%	35,08%	34,52%
6	Rasio Tier 1 (%) Tier 1 Ratio (%)	48,34%	45,98%	40,50%	35,08%	34,52%
7	Rasio Total Modal (%) Total Capital Ratio (%)	49,07%	46,73%	41,27%	35,81%	35,30%
	Tambahan CET1 yang berfungsi sebagai buffer dalam bentuk persentase dari ATMR Additonal CET1 that functions as a buffer in the form of percentage of RWA					
8	Capital Conservation buffer (2,5% dari ATMR) (%) Capital Conservation Buffer requirement (2.5% from RWA) (%)	0,00%	0,00%	0,00%	0,00%	0,00%
9	Countercyclical Buffer(0 - 2,5% dari ATMR) (%) Countercyclical Buffer Requirement (0 - 2.5% from RWA) (%)	0,00%	0,00%	0,00%	0,00%	0,00%
10	Capital Surcharge untuk Bank Sistemik (1% - 2,5%) (%) Capital Surcharge for Systemic Banks (1% - 2.5%) (%)	0,00%	0,00%	0,00%	0,00%	0,00%
11	Total CET1 sebagai buffer (Baris 8 + Baris 9 + Baris 10) Total of bank CET1 specific buffer requirements (%) (Row 8 + Row 9 + Row 10)	0,00%	0,00%	0,00%	0,00%	0,00%
12	Komponen CET1 untuk buffer CET1 available after meeting the bank's minimum capital requirements (%)	38,57%	36,23%	31,27%	25,81%	25,26%
	Rasio pengungkit sesuai Basel III Basel III Leverage Ratio					
13	Total Eksposur Total Basel III leverage ratio exposure measure	18.949.373	18.414.609	17.894.497	18.088.625	17.261.572
14	Nilai Rasio Pengungkit, termasuk dampak dari penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan GWM (jika ada) Basel III leverage ratio, including the impact of any applicable temporary exemption of central bank reserves (if any)	21,25%	21,42%	20,51%	19,37%	19,26%

dalam jutaan Rupiah | in million Rupiah

No	Deskripsi Description	Dec-25	Sep-25	Jun-25	Mar-25	Dec-24
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) Basel III leverage ratio, excluding the impact of any applicable temporary exemption of central bank reserves (if any)	21,25%	21,42%	20,51%	19,37%	19,26%
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. Basel III leverage ratio, including the impact of any applicable temporary exemption of central bank reserves (if any), incorporating mean values for SFT assets.	20,90%	20,43%	19,37%	18,81%	18,27%
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 Basel III leverage ratio, excluding the impact of any applicable temporary exemption of central bank reserves (if any), incorporating mean values for SFT assets	20,90%	20,43%	19,37%	18,81%	18,27%
	Rasio Kecukupan Likuiditas (LCR) Liquidity Coverage Ratio (LCR)					
15	Total Aset Likuid Berkualitas Tinggi (HQLA) Total High-Quality Liquid Asset (HQLA)	10.143.540	9.243.377	8.079.075	7.903.722	7.962.618
16	Total Arus Kas Keluar Bersih Total Net Cash Outflow	1.649.537	1.506.302	1.167.887	1.296.645	937.385
17	LCR (%)	614,93%	613,65%	691,77%	609,55%	849,45%
	Rasio Pendanaan Stabil Bersih (NSFR) Net Stable Funding Ratio (NSFR)					
18	Total Pendanaan Stabil yang Tersedia (ASF) Total Available Stable Funding	15.227.986	14.973.599	14.764.502	14.876.576	14.478.795
19	Total Pendanaan Stabil yang Diperlukan (RSF) Total Required Stable Funding	5.466.009	5.368.660	5.707.720	6.515.131	6.041.801
20	NSFR (%)	278,59%	278,91%	258,68%	228,34%	239,64%
	Analisis Kualitatif Qualitative Analysis					

1. Kenaikan Modal pada Desember 2025 sebagai dampak dari kenaikan laba tahun berjalan dan penghasilan komprehensif lain.
   Capital increase in December 2025 resulting from an increase in net income and other comprehensive income.
2. Rasio pengungkit posisi Desember 2025 turun sebesar 0,17% dibandingkan kuartal sebelumnya sebagai dampak dari kenaikan total ekposur.
   The leverage ratio as of December 2025 decreased by 0.17% compared to the previous quarter due to an increase in total exposure.

Perbedaan Cakupan Konsolidasi antara Standar Akuntansi dan Ketentuan Kehati-hatian (LI1) – 2025
Differences in the Scope of Consolidation Between Accounting Standards and Prudential Regulations (LI1) – 2025

Keterangan Description	31 Desember 2025 December 31, 2025	
	a	b
	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan Carrying amount as stated in the published financial statements	**Nilai tercatat berdasarkan prinsip kehati-hatian** Carrying amount is based on the precautionary principle
Indonesia		
Aset | Asset		
Kas | Cash	9.760	9.760
Penempatan pada Bank Indonesia Placement with Bank Indonesia	2.507.828	2.507.828
Penempatan pada bank lain Placement with other banks	554.724	554.724
Tagihan spot dan derivatif/forward Spot and derivative/forward receivables	-	-
Surat berharga yang dimiliki | Securities	7.566.674	7.566.674
Surat berharga yang dijual dengan janji dibeli kembali (repo) Securities sold under repurchase agreement (repo)	-	-
Tagihan atas surat berharga yang dibeli dengan janji dijual kembali (reverse repo) Claims on securities bought under reverse repo	651.407	651.407
Tagihan akseptasi Acceptance receivables	-	-
Kredit yang diberikan Loans	6.667.524	6.667.524
Pembiayaan syariah Sharia financing	-	-
Penyertaan modal Capital Investment	-	-
Aset keuangan lainnya Other financial assets	203.149	203.149
Aset tidak berwujud Intangible assets	151.403	151.403
Aset tetap dan inventaris Fixed assets and equipment	272.283	272.283
Aset non produktif Non earning assets	57.037	57.037
Aset lainnya Other assets	331.980	331.980
Total aset Total assets	18.973.769	18.973.769

dalam jutaan Rupiah | in million Rupiah

	c	d	e	f	g
	Nilai tercatat masing-masing risiko Carrying values of items				
	Sesuai kerangka risiko kredit According to credit risk framework	**Sesuai kerangka counterparty credit risk** According to counterparty credit risk framework	**Sesuai kerangka sekuritisasi** According to securitization framework	**Sesuai kerangka risiko pasar** According to market risk framework	**Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal** Does not refer to capital requirements or based on capital reduction
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	39.968	-	-	-	-
	-	-	-	-	-
	-	651.407	-	-	-
	-	-	-	-	-
	6.873.030	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	204.832	-	-	-	-
	-	-	-	-	-
	272.283	-	-	-	-
	85.556	-	-	-	-
	331.980	-	-	-	-
	7.807.649	-	-	-	-

Keterangan Description	31 Desember 2025 December 31, 2025	
	a	b
	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan Carrying amount as stated in the published financial statements	**Nilai tercatat berdasarkan prinsip kehati-hatian** Carrying amount is based on the precautionary principle
Kewajiban **Liabilities**		
Giro | Current Account	667.381	667.381
Tabungan Saving Account	3.501.410	3.501.410
Deposito Time Deposit	9.857.351	9.857.351
Uang Elektronik Electronic Money	-	-
Liabilitas kepada Bank Indonesia Liabilities to Bank Indonesia	-	-
Liabilitas kepada bank lain Liabilities to other banks	71.891	71.891
Liabilitas spot dan derivatif/forward Spot and derivatve/forward liabilities	-	-
Liabilitas atas surat berharga yang dijual dengan janji dibeli kembali (repo) Liabilities on securities sold under repurchase agreement (repo)	-	-
Liabilitas akseptasi Acceptance liabilities	-	-
Surat berharga yang diterbitkan Issued securities	-	-
Pinjaman/Pembiayaan yang diterima Loans/financing received	-	-
Setoran jaminan Margin deposit	-	-
Liabilitas antarkantor Interbranch liabilities	-	-
Liabilitas lainnya Other liabilities	645.010	645.010
Kepentingan minoritas Minority interest	-	-
Total Kewajiban Total Liabilities	14.743.043	14.743.043

dalam jutaan Rupiah | in million Rupiah

	c	d	e	f	g
	Nilai tercatat masing-masing risiko Carrying values of items				
	Sesuai kerangka risiko kredit According to credit risk framework	**Sesuai kerangka counterparty credit risk** According to counterparty credit risk framework	**Sesuai kerangka sekuritisasi** According to securitization framework	**Sesuai kerangka risiko pasar** According to market risk framework	**Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal** Does not refer to capital requirements or based on capital reduction
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-

Perbedaan Cakupan Konsolidasi antara Standar Akuntansi dan Ketentuan Kehati-hatian (LI1) – 2025
Differences in the Scope of Consolidation Between Accounting Standards and Prudential Regulations (LI1) – 2025

Keterangan Description	31 Desember 2024 December 31, 2024	
	a	b
	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan Carrying amount as stated in the published financial statements	**Nilai tercatat berdasarkan prinsip kehati-hatian** Carrying amount is based on the precautionary principle
Indonesia		
Aset | Asset		
Kas | Cash	12.133	12.133
Penempatan pada Bank Indonesia Placement with Bank Indonesia	1.430.095	1.430.095
Penempatan pada bank lain Placement with other banks	80.916	80.916
Tagihan spot dan derivatif/forward Spot and derivative/forward receivables	-	-
Surat berharga yang dimiliki | Securities	4.681.952	4.681.952
Surat berharga yang dijual dengan janji dibeli kembali (repo) Securities sold under repurchase agreement (repo)	-	-
Tagihan atas surat berharga yang dibeli dengan janji dijual kembali (reverse repo) Claims on securities bought under reverse repo	1.878.331	1.878.331
Tagihan akseptasi Acceptance receivables	-	-
Kredit yang diberikan Loans	8.186.901	8.186.901
Pembiayaan syariah Sharia financing	-	-
Penyertaan modal Capital Investment	-	-
Aset keuangan lainnya Other financial assets	256.372	256.372
Aset tidak berwujud Intangible assets	134.577	134.577
Aset tetap dan inventaris Fixed assets and equipment	308.368	308.368
Aset non produktif Non earning assets	128.246	128.246
Aset lainnya Other assets	311.174	311.174
Total aset Total assets	17.409.065	17.409.065

dalam jutaan Rupiah | in million Rupiah

	c	d	e	f	g
	Nilai tercatat masing-masing risiko Carrying values of items				
	Sesuai kerangka risiko kredit According to credit risk framework	**Sesuai kerangka counterparty credit risk** According to counterparty credit risk framework	**Sesuai kerangka sekuritisasi** According to securitization framework	**Sesuai kerangka risiko pasar** According to market risk framework	**Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal** Does not refer to capital requirements or based on capital reduction
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	11.068	-	-	-	-
	-	-	-	-	-
	-	1.878.331	-	-	-
	-	-	-	-	-
	8.395.005	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	261.445	-	-	-	-
	-	-	-	-	-
	308.368	-	-	-	-
	192.368	-	-	-	-
	311.173	-	-	-	-
	9.479.428	-	-	-	-

Keterangan Description	31 Desember 2024 December 31, 2024	
	a	b
	Nilai tercatat sebagaimana tercantum dalam publikasi laporan keuangan Carrying amount as stated in the published financial statements	**Nilai tercatat berdasarkan prinsip kehati-hatian** Carrying amount is based on the precautionary principle
Kewajiban Liabilities		
Giro Current Account	514.834	514.834
Tabungan Saving Account	3.095.982	3.095.982
Deposito Time Deposit	9.452.976	9.452.976
Uang Elektronik Electronic Money	-	-
Liabilitas kepada Bank Indonesia Liabilities to Bank Indonesia	-	-
Liabilitas kepada bank lain Liabilities to other banks	129.079	129.079
Liabilitas spot dan derivatif/forward Spot and derivatve/forward liabilities	-	-
Liabilitas atas surat berharga yang dijual dengan janji dibeli kembali (repo) Liabilities on securities sold under repurchase agreement (repo)	-	-
Liabilitas akseptasi Acceptance liabilities	-	-
Surat berharga yang diterbitkan Issued securities	-	-
Pinjaman/Pembiayaan yang diterima Loans/financing received	-	-
Setoran jaminan Margin deposit	-	-
Liabilitas antarkantor Interbranch liabilities	-	-
Liabilitas lainnya Other liabilities	654.357	654.357
Kepentingan minoritas Minority interest	-	-
Total Kewajiban Total Liabilities	13.847.228	13.847.228

dalam jutaan Rupiah | in million Rupiah

	c	d	e	f	g
	Nilai tercatat masing-masing risiko Carrying values of items				
	Sesuai kerangka risiko kredit According to credit risk framework	**Sesuai kerangka counterparty credit risk** According to counterparty credit risk framework	**Sesuai kerangka sekuritisasi** According to securitization framework	**Sesuai kerangka risiko pasar** According to market risk framework	**Tidak mengacu pada persyaratan permodalan atau berdasarkan pengurangan modal** Does not refer to capital requirements or based on capital reduction
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-
	-	-	-	-	-

Perbedaan Utama Antara Nilai Tercatat Sesuai Standar Akuntansi Keuangan Dengan Nilai Eksposur Sesuai Dengan Ketentuan OJK (LI2)
Key Differences Between Carrying Values Under Financial Accounting Standards and Exposure Values Under OJK Regulations (LI2)

dalam jutaan Rupiah | in million Rupiah

	Keterangan Description	31 Desember 2025 December 31, 2025				
		a	b	c	d	e
		Total	Item sesuai: Items based on:			
			Kerangka risiko kredit Credit risk framework	**Kerangka sekuritisasi** Securitization framework	**Kerangka Counterparty credit risk** Counterparty credit risk framework	**Kerangka risiko pasar** Market risk framework
	Indonesia					
1	Nilai tercatat aset sesuai dengan cakupan konsolidasi ketentuan kehati-hatian (sebagaimana dilaporkan pada template LI1) Asset carrying value amount under scope of regulatory consolidation (as per template LI1)	18.973.769	7.807.649	-	651.407	-
2	Nilai tercatat liabilitas sesuai lingkup sesuai dengan cakupan konsolidasi ketentuan kehati-hatian (sebagaimana dilaporkan pada template LI1) Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1)	14.743.043	-	-	-	-
3	Total nilai bersih sesuai dengan cakupan konsolidasi ketentuan kehati-hatian Total net amount under regulatory scope of consolidation	4.230.726	-	-	-	-
4	Nilai rekening administratif Off-balance sheet amounts	1.290.280	-	-	-	-
5	Perbedaan valuasi Differences in valuations					
6	Perbedaan antara netting rules, selain dari yang termasuk pada baris 2. Differences due to different netting rules, other than those already included in row 2	-	-	-	-	-
7	Perbedaan provisi Differences due to consideration of provisions	-	-	-	-	-
8	Perbedaan prudential filters Differences due to prudential filters	-	-	-	-	-
	Nilai eksposur yang dipertimbangkan, sesuai dengan cakupan konsolidasi ketentuan kehati-hatian Exposure amounts considered for regulatory purposes	-	-	-	-	-

dalam jutaan Rupiah | in million Rupiah

Keterangan Description		31 Desember 2024 December 31, 2024				
		a	b	c	d	e
		Total	Item sesuai: Items based on:			
			Kerangka risiko kredit Credit risk framework	**Kerangka sekuritisasi** Securitization framework	**Kerangka Counterparty credit risk** Counterparty credit risk framework	**Kerangka risiko pasar** Market risk framework
	Indonesia					
1	Nilai tercatat aset sesuai dengan cakupan konsolidasi ketentuan kehati-hatian (sebagaimana dilaporkan pada template LI1) Asset carrying value amount under scope of regulatory consolidation (as per template LI1)	17.409.065	9.479.428	-	1.878.331	-
2	Nilai tercatat liabilitas sesuai lingkup sesuai dengan cakupan konsolidasi ketentuan kehati-hatian (sebagaimana dilaporkan pada template LI1) Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1)	13.847.228	-	-	-	-
3	Total nilai bersih sesuai dengan cakupan konsolidasi ketentuan kehati-hatian Total net amount under regulatory scope of consolidation	3.561.837	-	-	-	-
4	Nilai rekening administratif Off-balance sheet amounts	7.664	-	-	-	-
5	Perbedaan valuasi Differences in valuations					
6	Perbedaan antara netting rules, selain dari yang termasuk pada baris 2. Differences due to different netting rules, other than those already included in row 2	-	-	-	-	-
7	Perbedaan provisi Differences due to consideration of provisions	-	-	-	-	-
8	Perbedaan prudential filters Differences due to prudential filters	-	-	-	-	-
	Nilai eksposur yang dipertimbangkan, sesuai dengan cakupan konsolidasi ketentuan kehati-hatian Exposure amounts considered for regulatory purposes	-	-	-	-	-

Penjelasan Mengenai Perbedaan Antara Nilai Eksposur Sesuai Dengan Standar Akuntansi Keuangan Dengan Ketentuan OJK (LIA)
Explanation of the Differences Between Exposure Values Under Financial Accounting Standards and OJK Regulations (LIA)

31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
Tidak terdapat perbedaan antara nilai tercatat sesuai standar akuntansi keuangan, sebagaimana dilaporkan pada laporan keuangan dengan nilai eksposur sesuai ketentuan kehati-hatian There is no difference between the carrying amount in accordance with financial accounting standards, as reported in the financial statements, and the exposure value in accordance with prudential regulations	Tidak terdapat perbedaan antara nilai tercatat sesuai standar akuntansi keuangan, sebagaimana dilaporkan pada laporan keuangan dengan nilai eksposur sesuai ketentuan kehati-hatian There is no difference between the carrying amount in accordance with financial accounting standards, as reported in the financial statements, and the exposure value in accordance with prudential regulations

Komposisi Permodalan (CC1)
Capital Composition (CC1)

dalam jutaan Rupiah | in million Rupiah

No	Komponen Component	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
	CET 1: Instrumen dan Tambahan Modal Disetor CET 1: Instruments and Additional Paid-in Capital		
1	Saham biasa (termasuk stock surplus) Ordinary shares (including stock surplus)	5.853.678	5.853.678
2	Laba ditahan Retained earnings	(1.729.595)	(2.266.207)
3	Akumulasi penghasilan komprehensif lain (dan cadangan lain) Accumulated other comprehensive income (and other reserves)	106.445	(24.268)
4	Modal yang termasuk phase out dari CET1 Capital that includes phase out from CET1	-	-
5	Kepentingan Non Pengendali yang dapat diperhitungkan Considerable Non-Controlling Interests	-	-
6	CET1 sebelum regulatory adjustment CET1 capital before regulatory adjustment	4.230.528	3.563.203
	CET 1: Faktor Pengurang (Regulatory Adjustment) CET 1 capital: Deduction Factor (Regulatory Adjustment)		
7	Selisih kurang jumlah penyesuaian nilai wajar dari instrumen keuangan dalam trading book Differences on Adjustment of Fair Value on Financial Instrument in Trading Book	-	-
8	Goodwill	-	-
9	Aset tidak berwujud lainnya (selain Mortgage-Servicing Rights) Other intangibles (other than Mortgage-Servicing Rights)	151.403	134.577
10	Aset pajak tangguhan yang berasal dari future profitability Deferred tax assets that rely on future profitability	-	-
11	*Mortgage Servicing Rights*	-	-
12	*Shortfall on provisions to expected losses*	-	-
13	Keuntungan penjualan aset dalam transaksi sekuritisasi Securitisation gain on sale in securitization transactions	-	-
14	Peningkatan/ penurunan nilai wajar atas kewajiban keuangan (DVA) Gains/Losses from Changes in Fair Value of Financial Liabilities (DVA)	-	-

dalam jutaan Rupiah | in million Rupiah

No	Komponen Component	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
15	Aset pensiun manfaat pasti Defined-benefit pension fund net assets	-	-
16	Investasi pada saham sendiri (jika belum di net dalam modal di Laporan Posisi Keuangan) Investment 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 cross-holdings in common equity	-	-
18	Investasi pada modal bank, entitas keuangan dan asuransi diluar 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%) 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 diluar cakupan konsolidasi secara ketentuan, net posisi short yang diperkenankan (jumlah di atas batasan 10%) 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*	-	-
21	Aset pajak tangguhan yang berasal dari perbedaan temporer (jumlah di atas batasan 10%, net dari kewajiban pajak) Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-	-
22	Jumlah melebihi batasan 15% dari: Amount exceeding the 15% threshold :	-	-
23	Investasi signifikan pada saham biasa financials Significant investments in the common stock of financials	-	-
24	*Mortgage Servicing Rights*	-	-
25	Pajak tangguhan dari perbedaan temporer Deferred tax assets arising from temporary differences	-	-
26	Penyesuaian berdasarkan ketentuan spesifik nasional National specific regulatory adjustments		
	a. Selisih PPKA dan CKPN Difference between PPKA and Allowance for Impairment Losses	-	-
	b. PPKA non produktif Non-productive PPKA	51.477	88.313
	c. Aset Pajak Tangguhan Deffered Tax Assets	-	14.883
	d. Penyertaan Investments in shares of stock	-	-
	e. Kekurangan modal pada perusahaan anak asuransi Shortage of capital on insurance subsidiary company	-	-
	f. Eksposur sekuritisasi Securitization exposure	-	-

dalam jutaan Rupiah | in million Rupiah

No	Komponen Component	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
	g. Lainnya Other deduction	-	-
27	Penyesuaian pada CET 1 akibat AT 1 dan Tier 2 lebih kecil daripada faktor pengurangnya Adjustment to CET 1 due to AT 1 and Tier 2 is smaller than the reduction factor	-	-
28	Jumlah pengurang (regulatory adjustment) terhadap CET 1 Amount of deduction (regulatory adjustment) to CET 1	202.879	237.773
29	Jumlah CET 1 setelah faktor pengurang The number of CET 1 after the reduction factor	4.027.649	3.325.430
	Modal Inti Tambahan (AT 1): Instrumen Additional Tier 1 capital: instruments		
30	Instrumen AT 1 yang diterbitkan oleh Bank (termasuk stock surplus) AT 1 instruments issued by the Bank (including surplus stock)	-	-
31	Yang diklasifikasikan sebagai ekuitas berdasarkan standar akuntansi Classified as equity under accounting standards	-	-
32	Yang diklasifikasikan sebagai liabilitas berdasarkan standar akuntansi Classified as a liability based on accounting standards	-	-
33	Modal yang termasuk phase out dari AT 1 Capital including in phase out from AT 1	-	-
34	Instrumen AT 1 yang diterbitkan oleh Entitas Anak yang diakui dalam perhitungan KPMM secara konsolidasi The AT 1 instrument issued by a Subsidiary is recognized in the CAR calculation on a consolidated basis	-	-
35	Instrumen yang diterbitkan Entitas Anak yang termasuk phase out Instruments issued by Subsidiaries including phase out	-	-
36	Jumlah AT 1 sebelum regulatory adjustment Total AT 1 before regulatory adjustment	-	-
	Modal Inti Tambahan: Faktor Pengurang (Regulatory Adjustment) Additional Core Capital: Deduction Factor (Regulatory Adjustment)		
37	Investasi pada instrumen AT 1 sendiri Invest in AT 1 instruments	-	-
38	Kepemilikan silang pada instrumen AT 1 pada entitas lain Cross-ownership of AT 1 instruments in other entities	-	-
39	Investasi pada modal bank, entitas keuangan dan asuransi diluar 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%) Investments in the capital of banks, financial and insurance entities outside the scope of consolidated regulations, net short positions are permitted, where the Bank does not own more than 10% of the issued share capital (amount above the limit of 10%)	-	-
40	Investasi signifikan pada modal Bank, entitas keuangan dan asuransi di luar cakupan konsolidasi secara ketentuan (net posisi short yang diperkenankan) Significant investment in the capital of the Bank, financial entities and insurance outside the scope of consolidation in terms of provisions (net short positions allowed)	-	-

dalam jutaan Rupiah | in million Rupiah

No	Komponen Component	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
41	Penyesuaian berdasarkan ketentuan spesifik nasional Adjustments based on national specific provisions	-	-
	a. Penempatan dana pada instrumen AT 1 pada Bank lain Placement of funds in AT 1 instruments at other banks	-	-
42	Penyesuaian pada AT 1 akibat Tier 2 lebih kecil daripada faktor pengurangnya The adjustment to AT 1 due to Tier 2 is smaller than the reduction factor	-	-
43	Jumlah faktor pengurang (regulatory adjustment) terhadap AT 1 Total reduction factor (regulatory adjustment) to AT 1	-	-
44	Jumlah AT 1 setelah faktor pengurang Total AT 1 after the deduction factor	-	-
45	Jumlah Modal Inti (Tier 1) (CET 1 + AT 1) Total Core Capital (Tier 1) (CET 1 + AT 1)	-	-
	Modal Pelengkap (Tier 2): Instrumen dan cadangan Supplementary Capital (Tier 2): Instruments and reserves		
46	Instrumen Tier 2 yang diterbitkan oleh Bank (termasuk stock surplus) Tier 2 instruments issued by the Bank (including surplus stock)	-	-
47	Modal yang yang termasuk phase out dari Tier 2 Capital which includes phase out from Tier 2	-	-
48	Instrumen Tier 2 yang diterbitkan oleh Entitas Anak yang diakui dalam perhitungan KPMM secara konsolidasi Tier 2 instruments issued by Subsidiaries that are recognized in the consolidated CAR calculation	-	-
49	Modal yang diterbitkan Entitas Anak yang termasuk phase out Capital issued by Subsidiaries including phase out	-	-
50	Cadangan umum PPKA atas aset produktif yang wajib dihitung dengan jumlah paling tinggi sebesar 1,25% dari ATMR untuk Risiko Kredit PPKA general reserves for productive assets that must be calculated with a maximum amount of 1.25% of RWA for Credit Risk	60.756	75.603
51	Jumlah Modal Pelengkap (Tier 2) sebelum faktor pengurang Total Supplementary Capital (Tier 2) before deduction factor	60.756	75.603
	Modal Pelengkap (Tier 2): Faktor Pengurang (Regulatory Adjustment) Supplementary Capital (Tier 2): Deduction Factor (Regulatory Adjustment)		
52	Investasi pada instrumen Tier 2 sendiri Investment in Tier 2 instruments	-	-
53	Kepemilikan silang pada instrumen Tier 2 pada entitas lain Cross-ownership of a Tier 2 instrument in other entities	-	-
54	Investasi pada kewajiban TLAC modal bank, entitas keuangan dan asuransi diluar cakupan konsolidasi secara ketentuan, net posisi short yang diperkenankan, dimana Bank tidak memiliki lebih dari 10% modal saham yang diterbitkan; nilai sebelumnya ditetapkan dengan threshold 5% namun tidak lagi memenuhi kriteria (untuk bank Sistemik) Investments in TLAC capital liabilities of banks, financial and insurance entities outside the scope of consolidation by regulation, net short positions are permitted, where the Bank does not own more than 10% of the issued share capital; the previous value was set with a threshold of 5% but no longer meets the criteria (for Systemic banks)	-	-

dalam jutaan Rupiah | in million Rupiah

No	Komponen Component	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
55	Investasi signifikan pada modal atau instrumen TLAC Bank, entitas keuangan dan asuransi di luar cakupan konsolidasi secara ketentuan (*net* posisi *short* yang diperkenankan) Significant investments in capital or instruments of TLAC Banks, financial and insurance entities outside the scope of regulatory consolidation (net short positions allowed)	-	-
56	Penyesuaian berdasarkan ketentuan spesifik nasional Adjustments based on national specific provisions	-	-
	a. *Sinking fund*	-	-
	b. Penempatan dana pada instrumen Tier 2 pada Bank lain Fund placement in Tier 2 instruments on other banks	-	-
57	Jumlah faktor pengurang (regulatory adjustment) Modal Pelengkap Total deduction factor (regulatory adjustment) of Supplementary Capital	-	-
58	Jumlah Modal Pelengkap (Tier 2) setelah regulatory adjustment Amount of Supplementary Capital (Tier 2) after regulatory adjustment	60.756	75.603
59	Total Modal (Modal Inti + Modal Pelengkap) Total Capital (Core Capital + Supplementary Capital)	4.088.405	3.401.033
60	Total Aset Tertimbang Menurut Risiko (ATMR) Total Risk Weighted Assets (RWA)	8.331.999	9.634.590
	Rasio Kecukupan Pemenuhan Modal Minimum (KPMM) dan Tambahan Modal (Capital Buffer) **Minimum Capital Adequacy Ratio (CAR) and Additional Capital (Capital Buffer)**		
61	Rasio Modal Inti Utama CET 1 (persentase terhadap ATMR) CET ratio 1 (percentage of RWA)	-	-
62	Rasio Modal Inti Tier 1 (persentase terhadap ATMR) Tier 1 Core Capital Ratio (percentage of RWA)	48,34%	34,52%
63	Rasio Total Modal (persentase terhadap ATMR) Capital Total Ratio (percentage of RWA)	49,07%	35,30%
64	Buffer (persentase terhadap ATMR) Buffer (percentage of RWA)	38,57%	25,26%
65	*Capital Conservation Buffer*	0,00%	0,00%
66	*Countercyclical Buffer*	0,00%	0,00%
67	*Higher Loss Absorbency Requirement*	0,00%	0,00%
68	CET 1 yang tersedia untuk memenuhi Buffer (persentase terhadap ATMR) Common Equity Tier 1 available to meet buffers (as a percentage of risk weighted assets)	-	-
	National minima (jika berbeda dari Basel 3) National minima (if it is different from Basel 3)		
69	Rasio terendah CET 1 nasional (jika berbeda dengan Basel 3) National CET 1 lowest ratio (if it is different from Basel 3)	-	-
70	Rasio terendah Tier 1 nasional (jika berbeda dengan Basel 3) National Tier 1 lowest ratio (if it is different from Basel 3)	-	-
71	Rasio terendah total modal nasional (jika berbeda dengan Basel 3) Total national capital lowest ratio (if it is different from Basel 3)	-	-

dalam jutaan Rupiah | in million Rupiah

No	Komponen Component	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
	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 Non-significant investments in TLAC's capital or other obligations in other financial entities	-	-
73	Investasi signifikan pada saham biasa entitas keuangan Significant investments in the common stock of financial entities	-	-
74	Mortgage servicing rights (net dari kewajiban pajak) Mortgage servicing rights (net of tax liabilities)	-	-
75	Aset pajak tangguhan yang berasal dari perbedaan temporer (net dari kewajiban pajak) Deferred tax assets arising from temporary differences (net of tax liabilities)	-	-
	Cap yang dikenakan untuk provisi pada Tier 2 Cap imposed for provision at Tier 2		
76	Provisi yang dapat diakui sebagai Tier 2 sesuai dengan eksposur berdasarkan pendekatan standar (sebelum dikenakan cap) Provisions that can be recognized as Tier 2 according to exposure under the standard approach (before cap)	-	-
77	Cap atas provisi yang diakui sebagai Tier 2 berdasarkan pendekatan standar Cap on provision recognized as Tier 2 under a standardized approach	-	-
78	Provisi yang dapat diakui sebagai Tier 2 sesuai dengan eksposur berdasarkan pendekatan IRB (sebelum dikenakan cap) Provisions that can be recognized as Tier 2 according to exposure under the IRB approach (before cap)	-	-
79	Cap atas provisi yang diakui sebagai Tier 2 berdasarkan pendekatan IRB Cap on provisions recognized as Tier 2 under the IRB approach	-	-
	Instrumen Modal yang termasuk phase out (hanya berlaku antara 1 Jan 2018 s.d. 1 Jan 2022) Capital Instruments that include phase out (only valid between 1 Jan 2018 to 1 Jan 2022)		
80	Cap pada CET 1 yang temasuk phase out Cap in CET 1 including phase out	-	-
81	Jumlah yang dikecualikan dari CET 1 karena adanya cap (kelebihan di atas cap setelah redemptions dan maturities) Amount excluded from CET 1 due to cap (excess above cap after redemptions and maturities)	-	-
82	Cap pada AT 1 yang temasuk phase out Cap in AT 1 including phase out	-	-
83	Jumlah yang dikecualikan dari AT 1 karena adanya cap (kelebihan di atas cap setelah redemptions dan maturities) Amount excluded from AT 1 due to cap (excess above cap after redemptions and maturities)	-	-
84	Cap pada Tier 2 yang temasuk phase out Cap in Tier 2 including phase out	-	-
85	Jumlah yang dikecualikan dari Tier 2 karena adanya cap (kelebihan di atas cap setelah redemptions dan maturities) Amount excluded from AT 2 due to cap (excess above cap after redemptions and maturities)	-	-

Rekonsiliasi Permodalan (CC2)
Capital Reconciliation (CC2)

dalam jutaan Rupiah | in million Rupiah

No.	Pos - Pos Instruments	Individual	
		31 Desember 2025 December 31, 2025	**31 Desember 2024** December 31, 2024
ASET ASSETS			
1.	Kas Cash	9.760	12.133
2.	Penempatan pada Bank Indonesia Placement with Bank Indonesia	2.507.828	1.430.096
3.	Penempatan pada bank lain Placement with other banks	554.724	80.916
4.	Tagihan spot dan derivatif/forward Spot and derivative/forward claims	-	-
5.	Surat berharga yang dimiliki Amortized cost marketable securities	7.566.676	4.681.952
6.	Surat berharga yang dijual dengan janji dibeli kembali (repo) Securities sold under agreements to repurchase (repo)	-	-
7.	Tagihan atas surat berharga yang dibeli dengan janji dijual kembali (reverse repo) Claims on securities purchased with agreements to resell (reverse repo)	651.407	1.878.331
8.	Tagihan akseptasi Acceptance bills	-	-
9.	Kredit yang diberikan Loans	7.182.580	8.822.146
10.	Pembiayaan syariah Sharia financing	-	-
11.	Penyertaan modal Capital investment	-	-
12.	Aset keuangan lainnya Other financial assets	204.832	340.878
13.	Cadangan kerugian penurunan nilai aset keuangan -/- Allowance for impairment losses on financial assets -/	-	-
	a. Surat berharga yang dimiliki Amortized cost marketable securities	(2)	-
	b. Kredit yang diberikan dan pembiayaan syariah Loans and Sharia financing	(515.056)	(635.245)
	c. Lainnya Others	(1.683)	(84.506)
14.	Aset tidak berwujud Intangible assets	211.960	183.405
	Akumulasi amortisasi aset tidak berwujud -/- Accumulated amortization of intangible assets -/-	(60.557)	(48.828)
15.	Aset tetap dan inventaris Fixed assets and inventory	451.562	439.364
	Akumulasi penyusutan aset tetap dan inventaris -/- Accumulated depreciation of fixed assets and inventory -/-	(179.279)	(130.996)

dalam jutaan Rupiah | in million Rupiah

No.	Pos - Pos Instruments	Individual	
		31 Desember 2025 December 31, 2025	**31 Desember 2024** December 31, 2024
16.	Aset non produktif Non-productive assets	-	-
	a. Properti terbengkalai Abandoned property	27.136	40.335
	b. Agunan yang diambil alih Foreclosed collaterals	29.901	87.911
	c. Rekening tunda Pending account	-	-
	d. Aset antarkantor Assets between offices	-	-
17.	Aset lainnya Other assets	331.980	311.174
	TOTAL ASET TOTAL ASSETS	18.973.769	17.409.065
LIABILITAS DAN EKUITAS LIABILITIES AND EQUITY			
	LIABILITAS LIABILITIES		
1.	Giro Current Account	667.381	514.834
2.	Tabungan Saving	3.501.410	3.095.982
3.	Deposito Deposit	9.857.351	9.452.976
4.	Uang Elektronik Electronic Money	-	-
5.	Liabilitas kepada Bank Indonesia Liabilities to Bank Indonesia	-	-
6.	Liabilitas kepada bank lain Liabilities to other banks	71.891	129.079
7.	Liabilitas spot dan derivatif/forward Spot and derivatve/forward liabilities	-	-
8.	Liabilitas atas surat berharga yang dijual dengan janji dibeli kembali (repo) Securities sold under agreements to repurchase (repo)	-	-
9.	Liabilitas akseptasi Acceptance liabilities	-	-
10.	Surat berharga yang diterbitkan Issued securities	-	-
11.	Pinjaman/Pembiayaan yang diterima Fund Borrowing	-	-
12.	Setoran jaminan Guarantee deposit	-	-
13.	Liabilitas antarkantor Liabilities between offices	-	-
14.	Liabilitas lainnya Other liabilities	645.010	654.357

dalam jutaan Rupiah | in million Rupiah

No.	Pos - Pos Instruments	Individual 31 Desember 2025 December 31, 2025	Individual 31 Desember 2024 December 31, 2024
15.	Kepentingan minoritas Minority interest	-	-
	TOTAL LIABILITAS TOTAL LIABILITIES	14.743.043	13.847.228
	EKUITAS EQUITY		
16.	Modal disetor Paid-in capital		
	a. Modal dasar Authorized capital	3.000.000	3.000.000
	b. Modal yang belum disetor -/- Unpaid capital -/-	(1.664.952)	(1.664.952)
	c. Saham yang dibeli kembali (treasury stock) -/- Treasury stock -/-	-	-
17.	Tambahan modal disetor Additional paid-in capital		
	a. Agio	4.485.444	4.485.444
	b. Disagio -/-	-	-
	c. Dana setoran modal Capital deposit fund	12.099	12.099
	d. Lainnya Others	-	-
18.	Penghasilan komprehensif lain Other comprehensive income		
	a. Keuntungan Profit	106.643	17.987
	b. Kerugian -/- Loss -/-	-	(43.621)
19.	Cadangan Reserves	-	
	a. Cadangan umum General reserves	21.087	21.087
	b. Cadangan tujuan Destination reserves	-	-
20.	Laba/rugi Profit/loss		
	a. Tahun-tahun lalu Previous years	(2.295.285)	(2.286.092)
	b. Tahun berjalan Current year	565.690	19.885
	c. Dividen yang dibayarkan -/- Paid dividend -/-	-	-
	TOTAL EKUITAS YANG DAPAT DIATRIBUSIKAN KEPADA PEMILIK TOTAL ATTRIBUTABLE EQUITY TO OWNERS	4.230.726	3.561.837
	TOTAL EKUITAS TOTAL EQUITY	4.230.726	3.561.837
	TOTAL LIABILITAS DAN EKUITAS TOTAL LIABILITY AND EQUITY	18.973.769	17.409.065

Fitur Utama Instrumen Permodalan dan Instrumen TLAC – *Eligible* (CCA)
Key Features of Capital Instruments and TLAC Instruments – Eligible (CCA)

No.	Pertanyaan Question	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information	
		31 Desember 2025 December 31, 2025	**31 Desember 2024** December 31, 2024
1	Penerbit Issuer	PT Bank Neo Commerce Tbk	PT Bank Neo Commerce Tbk
2	Nomor identifikasi Identification number	ID1000133408	ID1000133408
3	Hukum yang digunakan Applicable laws	Hukum Indonesia	Hukum Indonesia
3a	Sarana yang memungkinkan kewajiban pelaksanaan pada Bagian 13 dari Lembar Istilah TLAC tercapai (untuk instrumen TLAC sah lainnya yang diatur oleh hukum asing) Means by which the performance obligations under Section 13 of the TLAC Term Sheet may be met (for other valid TLAC instruments governed by foreign law)	N/A	N/A
	Perlakuan Instrumen berdasarkan ketentuan KPMM Regulatory treatment		
4	Pada saat masa transisi During the transition period	N/A	N/A
5	Setelah Masa Transisi After the transition period	CET1	CET1
6	Apakah instrumen eligible untuk Individu/Konsolidasi atau Konsolidasi dan Individu Is the instrument eligible for Individual/Consolidated or Consolidated and Individual	Individu	Individu
7	Jenis Instrumen Types of instrument	Saham Biasa	Saham Biasa
8	Jumlah yang diakui dalam perhitungan KPMM The amount recognized in the CAR calculation	1.335.048	1.335.048
9	Nilai par dari instrumen Value per instrument	1.335.048	1.335.048
10	Klasifikasi sesuai standar akuntansi keuangan Classification based on financial accounting standard	Ekuitas	Ekuitas
11	Tanggal penerbitan Issucance date	12/01/2015	12/01/2015
12	Tidak ada jatuh tempo (perpetual) atau dengan jatuh tempo There is no maturity (perpetual) or with maturity	Perpetual	Perpetual
13	Tanggal jatuh tempo Due date	-	-
14	Eksekusi call option atas persetujuan Otoritas Jasa Keuangan Call option execution based on the approval of the Financial Services Authority	-	-
15	Tanggal call option, jumlah penarikan dan persyaratan call option lainnya (bila ada) Call option date, withdrawal amount and other call option requirements (if any)	-	-
16	*Subsequent call option*	-	-
	Kupon / dividen Coupon/dividend		

No.	Pertanyaan Question	Informasi Kuantitatif/Kualitatif Quantitative/Qualitative Information	
		31 Desember 2025 December 31, 2025	**31 Desember 2024** December 31, 2024
17	Dividen/ kupon dengan bunga tetap atau floating Dividends/coupons with fixed or floating interest	Floating	Floating
18	Tingkat dari coupon rate atau index lain yang menjadi acuan The level of the coupon rate or other index that becomes a reference	Ditentukan RUPS	Ditentukan RUPS
19	Ada atau tidaknya dividend stopper The presence or absence of dividend stopper	-	-
20	Fully discretionary; partial atau mandatory Fully discretionary; partial or mandatory	-	-
21	Apakah terdapat fitur step up atau insentif lain Is there any step up feature or other incentive	-	-
22	Non-kumulatif atau kumulatif Non-cumulative or cumulative	-	-
23	Dapat dikonversi atau tidak dapat dikonversi Convertible or unconvertable	-	-
24	Jika dapat dikonversi, sebutkan trigger point-nya If convertible, mention the trigger point	-	-
25	Jika dapat dikonversi, apakah seluruh atau sebagian If convertible, is it a whole or partial	-	-
26	Jika dapat dikonversi, bagaimana rate konversinya If convertible, how is the conversion	-	-
27	Jika dapat dikonversi; apakah mandatory atau optional If convertible, is it mandatory or optional	-	-
28	Jika dapat dikonversi, sebutkan jenis instrumen konversinya If convertible, mention type of conversion instrument	-	-
29	Jika dapat dikonversi, sebutkan issuer of instrument it converts into If convertible, mention issuer of instrument it converts into	-	-
30	Fitur write-down Write-down feature	Tidak	Tidak
31	Jika terjadi write-down, sebutkan trigger-nya If write-down occurs, mention the trigger	-	-
32	Jika terjadi write-down, apakah penuh atau sebagian If write-down occurs, is it a whole or partil	-	-
33	Jika terjadi write down; permanen atau temporer If write-down occurs, is it permanent or temporary	-	-
34	Jika terjadi write down temporer, jelaskan mekanisme write-up If temporary write-down occurs, explaine the write-up mechanism	-	-
34a	Tipe subordinasi Type of subordinate	-	-
35	Hierarki instrumen pada saat likuidasi Instrument hierarchy during the liquidation	-	-
36	Apakah terdapat fitur yang non-compliant Is there any non-compliant feature	-	-
37	Jika Ya, jelaskan fitur yang non-compliant If any, explaine the non-compliant feature	-	-

Pengungkapan Kuantitatif Struktur Permodalan Bank Umum
Quantitative Disclosure of Commercial Bank Capital Structure

dalam jutaan Rupiah | in million Rupiah

Modal Capital	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
Modal Inti (Tier 1) The Core Capital (Tier-1)	4.027.649	3.325.430
Modal Pelengkap (Tier 2) The Complement Capital (Tier-2)	60.756	75.603
Jumlah Modal Total Capital	4.088.405	3.401.033
Aset Tertimbang Menurut Risiko Risk Weighted Assets		
Risiko Kredit Credit Risk	7.396.131	8.799.110
Risiko Operasional Operational Risk	935.868	835.188
Risiko Pasar Market Risk	-	-
Total ATMR Total RWA	8.331.999	9.634.298
Rasio Penyediaan Modal Provision Capital Risk		
Dengan risiko kredit, risiko pasar dan risiko operasional With credit risk, market risk and operational risk	49,07%	35,30%

Pengungkapan Kualitatif Permodalan dan Kecukupan Permodalan

Sesuai dengan ketentuan Otoritas Jasa Keuangan, permodalan yang diwajibkan bagi Bank dianalisis ke dalam dua lapisan (*tier*), yaitu Modal Inti (Tier 1) dan Modal Pelengkap (Tier 2).

- Modal inti terdiri atas modal inti utama dan modal inti tambahan. Modal inti utama mencakup antara lain modal ditempatkan dan disetor penuh, tambahan modal disetor, cadangan umum, laba tahun sebelumnya, laba periode berjalan yang diperhitungkan penuh, serta komponen penghasilan komprehensif lainnya yang berasal dari perubahan nilai wajar aset keuangan melalui penghasilan komprehensif lain. Selisih kurang penyisihan penghapusan aset produktif sesuai ketentuan Bank Indonesia serta cadangan kerugian penurunan nilai aset produktif yang diperkenankan juga menjadi bagian dari modal inti utama.
- Aset pajak tangguhan, aset tidak berwujud (termasuk *goodwill*), serta penyertaan yang diperhitungkan penuh merupakan faktor pengurang modal inti utama. Sementara itu, modal inti tambahan meliputi antara lain saham preferen, surat berharga subordinasi, dan pinjaman subordinasi yang bersifat non-kumulatif setelah dikurangi pembelian kembali.

Qualitative Disclosure of Capital and Capital Adequacy

In accordance with the regulations of the Financial Services Authority, the Bank's minimum capital is analyzed into two tiers: Core Capital (Tier 1) and Supplementary Capital (Tier 2).

- Core capital consists of primary core capital and supplementary core capital. Primary core capital includes paid-in and fully paid-up capital, additional paid-in capital, general reserves, previous year's profit, fully recognized current period profit, as well as other comprehensive income components arising from changes in the fair value of financial assets through other comprehensive income. The difference between the provision for impairment of earning assets in accordance with Bank Indonesia regulations and the allowed allowance for impairment losses on earning assets is also part of core capital.

- Deferred tax assets, intangible assets (including goodwill), and fully recognized investments are deductions from core capital. Meanwhile, supplementary core capital includes preferred shares, subordinated securities, and non-cumulative subordinated loans after deducting buybacks.

- Modal pelengkap (*Tier 2*) antara lain mencakup surat berharga subordinasi, pinjaman subordinasi, serta penyisihan penghapusan aset produktif sesuai ketentuan Bank Indonesia.
- Pada tanggal 31 Desember 2025 dan 31 Desember 2024, rasio Kewajiban Penyediaan Modal Minimum (KPMM) Bank masing-masing tercatat sebesar 49,07% dan 35,30%.
- Sepanjang periode pelaporan, Bank telah memenuhi seluruh persyaratan permodalan yang ditetapkan regulator, khususnya terkait perhitungan KPMM dan Aktiva Tertimbang Menurut Risiko (ATMR).

- Supplementary capital (Tier 2) includes, among others, subordinated securities, subordinated loans, and provisions for impairment of earning assets in accordance with Bank Indonesia regulations.
- As of December 31, 2025, and December 31, 2024, the Bank's Capital Adequacy Ratio (CAR) stood at 49.07% and 35.30%, respectively.
- Throughout the reporting period, the Bank has met all capital requirements set by the regulator, particularly regarding the calculation of the CAR and Risk-Weighted Assets (RWA).

Laporan Total Eksposur dalam Rasio Pengungkit
Report on Total Exposure in the Leverage Ratio

dalam jutaan Rupiah | in million Rupiah

No.	Keterangan Description	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
1	Total aset dilaporan posisi keuangan pada laporan keuangan publikasi. (nilai gross sebelum dikurangi CKPN) Total assets in the financial position statement in published financial statements. (gross value before deducted with CKPN)	19.490.510	18.128.816
2	Penyesuaian untuk nilai penyertaan pada Bank, lembaga keuangan, perusahaan asuransi, dan/atau entitas lain yang berdasarkan standar akuntansi keuangan harus dikonsolidasikan namun di luar cakupan konsolidasi berdasarkan ketentuan Otoritas Jasa Keuangan Adjustments for the value of investments in banks, financial institutions, insurance companies and/or other entities based on financial accounting standards must be consolidated but outside the scope of consolidation based on the provisions of the Financial Services Authority	-	-
3	Penyesuaian untuk nilai kumpulan aset keuangan yang mendasari yang telah dialihkan dalam sekuritisasi aset yang memenuhi persyaratan jual putus sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan mengenai prinsip kehati-hatian dalam aktivitas sekuritisasi aset bagi bank umum. Dalam hal aset keuangan yang mendasari dimaksud telah dikurangkan dari total aset pada laporan posisi keuangan maka angka pada baris ini adalah 0 (nol) Adjustment for the value of the underlying set of financial assets that have been transferred in asset securitization that meets the sale and end requirements as stipulated in the Financial Services Authority Regulation concerning the precautionary principle in asset securitization activities for commercial banks. In the event that the underlying financial assets referred to have been deducted from the total assets in the statement of financial position, the number in this line is 0 (zero).	-	-
4	Penyesuaian terhadap pengecualian sementara atas penempatan giro pada Bank Indonesia dalam rangka memenuhi ketentuan giro wajib minimum (jika ada) Adjustments to temporary exemptions for placement of current accounts with Bank Indonesia in order to comply with the minimum regulatory reserve requirements (if any)	N/A	N/A

dalam jutaan Rupiah | in million Rupiah

No.	Keterangan Description	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
5	Penyesuaian untuk aset fidusia yang diakui sebagai komponen laporan posisi keuangan berdasarkan standar akuntansi keuangan namun dikeluarkan dari perhitungan total eksposur dalam Rasio Pengungkit Adjustments for fiduciary assets that are recognized as a component of the statement of financial position based on financial accounting standards but are excluded from the calculation of total exposure in the Leverage Ratio	N/A	N/A
6	Penyesuaian untuk nilai pembelian atau penjualan aset keuangan secara reguler dengan menggunakan metode akuntansi tanggal perdagangan Adjustments to the value of regular purchases or sales of financial assets using the trade date method of accounting	-	-
7	Penyesuaian untuk nilai transaksi *cash pooling* yang memenuhi persyaratan sebagaimana diatur dalam Peraturan Otoritas Jasa Keuangan Rasio Pengungkit Adjustment for the value of cash pooling transactions that meet the requirements as stipulated in the Financial Services Authority Regulation Leverage Ratio	-	-
8	Penyesuaian untuk nilai eksposur transaksi derivatif Adjustments for derivative transaction exposure values	-	-
9	Penyesuaian untuk nilai eksposur SFT sebagai contoh transaksi reverse repo Adjustments for SFT exposure values for example reverse repo transactions	-	-
10	Penyesuaian untuk nilai eksposur TRA yang telah dikalikan dengan FKK Adjustment for TRA exposure value that has been multiplied by FKK	127.007	729
11	Penyesuaian penilaian prudensial berupa faktor pengurang modal dan CKPN Prudential assessment adjustments in the form of capital reduction factors and CKPN	(668.144)	(867.973)
12	Penyesuaian lainnya | Other adjustments	-	-
13	Total Eksposur dalam perhitungan Rasio Pengungkit Total Exposure in Leverage Ratio calculation	18.949.373	17.261.572

Analisis Kualitatif:

Total eksposur dalam rasio pengungkit per Desember 2025 tercatat sebesar Rp18.949.373 juta. Angka ini telah memperhitungkan penyesuaian atas eksposur transaksi derivatif, eksposur Transaksi Rekening Administratif (TRA), faktor pengurang modal, serta Cadangan Kerugian Penurunan Nilai (CKPN). TRA mencakup kewajiban komitmen atas fasilitas kredit kepada nasabah yang belum ditarik serta kewajiban kontinjensi atas garansi yang diberikan, sedangkan faktor pengurang modal terutama berasal dari aset tidak berwujud.

Sebagai pembanding, total eksposur dalam rasio pengungkit per Desember 2024 tercatat sebesar Rp17.261.572 juta, dengan komponen penyesuaian yang serupa, meliputi eksposur transaksi derivatif, TRA, faktor pengurang modal, dan CKPN.

Qualitative Analysis:

Total exposure under the leverage ratio as of December 2025 stood at Rp18,949,373 million. This figure has accounted for adjustments to derivative transaction exposure, Administrative Account Transaction (AAT) exposure, capital deduction factors, and the Allowance for Impairment Losses (AIL). TRA includes commitment liabilities for undrawn credit facilities to customers and contingent liabilities for guarantees provided, while capital reduction factors primarily stem from intangible assets.

For comparison, total exposure in the leverage ratio as of December 2024 was recorded at Rp17,261,572 million, with similar adjustment components, including derivative transaction exposure, TRA, capital reduction factors, and CKPN.

Laporan Perhitungan Rasio Pengungkit
Leverage Ratio Calculation Report

dalam jutaan Rupiah | in million Rupiah

No.	Keterangan Description	Periode | Period 31 Desember 2025 December 31, 2025	 31 Desember 2024 December 31, 2024
Eksposur Aset dalam Laporan Posisi Keuangan Asset Exposure in the Statement of Financial Position			
1	Eksposur aset dalam laporan posisi keuangan termasuk aset jaminan, namun tidak termasuk eksposur transaksi derivatif dan eksposur SFT (Nilai gross sebelum dikurangi CKPN) Asset Exposure in the Statement of Financial Position, including collateral assets, excluding derivative transaction exposure and SFT exposure (Gross value before deducted with CKPN)	18.839.103	16.250.485
2	Nilai penambahan kembali untuk agunan derivatif yang diserahkan kepada pihak lawan yang mengakibatkan penurunan total eksposur aset dalam neraca karena adanya penerapan standar akuntansi keuangan Added value back for derivative collateral handed over to counterparties leading to a decrease in total asset exposure in the balance sheet due to the application of financial accounting standards	-	-
3	(Pengurangan atas piutang terkait CVM yang diberikan dalam transaksi derivatif) (Deduction on receivables related to CVM given in derivative transactions)	-	-
4	(Penyesuaian untuk nilai tercatat surat berharga yang diterima dalam eksposur SFT yang diakui sebagai aset) (Adjustment to the carrying value of securities received in SFT exposure recognized as an asset)	-	-
5	(CKPN atas aset tersebut sesuai standar akuntansi keuangan) (CKPN on those assets according to financial accounting standards)	(516.741)	(719.751)
6	(Aset yang telah diperhitungkan sebagai faktor pengurang Modal Inti sebagaimana dimaksud dalam Peraturan Otoritas Jasa Keuangan mengenai kewajiban penyediaan modal minimum bagi bank umum) (Assets that have been calculated as a deduction factor for Core Capital as referred to in the Financial Services Authority Regulation regarding the minimum capital adequacy requirement for commercial banks)	(151.403)	(148.223)
7	Total Eksposur aset dalam laporan posisi keuangan Penjumlahan dari baris 1 sampai dengan baris 6 Total Asset exposure in the statement of financial position Addition from line 1 to line 6	18.170.959	15.382.511
Eksposur Transaksi Derivatif Derivative Transaction Exposure			
8	Nilai RC untuk seluruh transaksi derivatif baik dalam hal terdapat variation margin yang memenuhi syarat ataupun terdapat perjanjian saling hapus yang memenuhi persyaratan tertentu The RC value for all derivative transactions, whether there is a variation margin that meets the requirements or there is an offsetting agreement that meets certain requirements	-	-

dalam jutaan Rupiah | in million Rupiah

No.	Keterangan Description	Periode | Period 31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024
9	Nilai penambahan yang merupakan PFE untuk seluruh transaksi derivatif Added value that also serves as the PFE for all derivative transactions	-	-
10	Pengecualian atas eksposur transaksi derivatif yang diselesaikan melalui central counterparty (CCP) Exception of exposure to derivative transactions settled through a central counterparty (CCP)	N/A	N/A
11	Penyesuaian untuk nilai nosional efektif dari derivatif kredit Adjustment for the effective notional value of credit derivatives	-	-
12	Penyesuaian untuk nilai nosional efektif yang dilakukan saling hapus dan pengurangan add- on untuk transaksi penjualan derivatif kredit Adjustments to the effective notional amount are made for offsetting and reducing add-ons for credit derivative sales transactions	-	-
13	Total Eksposur Transaksi Derivatif Penjumlahan baris 8 sampai dengan baris 12 Total Derivative Transaction Exposure Addition of line 8 to line 12	-	-
Eksposur Securities Financing Transaction (SFT) Derivative Transaction Exposure/Securities Financing Transaction (SFT) Exposure			
14	Nilai tercatat aset SFT secara gross The carrying amount of SFT's assets on a gross basis	651.407	1.878.331
15	Nilai bersih antara liabilitas kas dan tagihan kas Net value between cash liabilities and cash receivables	-	-
16	Risiko Kredit akibat kegagalan pihak lawan terkait aset SFT yang mengacu pada perhitungan current exposure sebagaimana diatur dalam Lampiran Peraturan Otoritas Jasa Keuangan ini Credit Risk due to counterparty failure related to SFT assets, which refers to the current exposure calculation as stipulated in the Appendix to this Financial Services Authority Regulation	-	-
17	Eksposur sebagai agen SFT Exposure as an SFT agent	-	-
18	Total Eksposur SFT Penjumlahan baris 14 sampai dengan baris 17 Total SFT Exposure Addition of line 14 to line 17	651.407	1.878.331
Eksposur Transaksi Rekening Administratif (TRA) Administrative Account Transaction (TRA) Exposure			
19	Nilai seluruh kewajiban komitmen atau kewajiban kontinjensi Nilai gross sebelum dikurangi CKPN Value of all commitments or contingent liabilities Gross value before deducted with CKPN	1.290.280	7.664
20	Penyesuaian terhadap hasil perkalian antara nilai kewajiban komitmen atau kewajiban kontinjensi dan FKK kemudian dikurangi CKPN Adjustments to the multiplication result between the value of commitments or contingent liabilities and FKK are then reduced by CKPN	(1.161.252)	(6.897)
21	CKPN atas TRA sesuai standar akuntansi keuangan CKPN on TRA according to financial accounting standards	(2.006)	(38)

dalam jutaan Rupiah | in million Rupiah

No.	Keterangan Description	Periode | Period 31 Desember 2025 December 31, 2025	 31 Desember 2024 December 31, 2024
22	Total Eksposur TRA Penjumlahan dari baris 19 sampai dengan baris 21 Total TRA Exposure Addition of line 19 to line 21	127.022	729
Modal dan Total Eksposur Capital and Total Exposure			
23	Modal Inti Core Capital	4.027.649	3.325.430
24	Total Eksposur Penjumlahan baris 7, baris 13, baris 18, dan baris 22 Total Exposure Addition of line 7, line 13, line 18, and line 22	18.949.388	17.261.571
Rasio Pengungkit (Leverage) Leverage Ratio			
25	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) Leverage Ratio value, including the impact of adjustments to temporary exemptions for placement of current accounts with Bank Indonesia in order to comply with the minimum regulatory reserve requirements (if any)	21,25%	19,26%
25a	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) Leverage Ratio value, excluding the impact of adjustments to temporary exemptions for placement of current accounts with Bank Indonesia in order to comply with the minimum regulatory reserves requirements (if any)	21,25%	19,26%
26	Nilai Minimum Rasio Pengungkit Minimum Value of Leverage Ratio	3,00%	3,00%
27	Bantalan terhadap nilai Rasio Pengungkit Bearing to Leverage Ratio value	N/A	N/A
Pengungkapan Nilai Rata-Rata Disclosure of Average Ratio			
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 The average value of the carrying amount of SFT's assets on a gross basis, after adjustment for sales accounting transactions netted with cash liabilities in SFT and cash receivables in SFT	325.703	939.166
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 End of reporting quarter value of the carrying amount of SFT's assets on a gross basis, after adjustment for sales accounting transactions netted with cash liabilities in SFT and cash receivables in SFT	651.407	606.480

dalam jutaan Rupiah | in million Rupiah

No.	Keterangan Description	Periode | Period	
		31 Desember 2025 December 31, 2025	**31 Desember 2024** December 31, 2024
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 Total Exposure, including the impact of adjustments to temporary exemptions for placement of current accounts with Bank Indonesia in order to comply with the minimum regulatory reserves requirements (if any), which has included the average value of the gross carrying value of SFT assets as referred to in line 28	19.275.076	18.200.738
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 Total Exposure, excluding the impact of adjustments to temporary exemptions for placement of current accounts with Bank Indonesia in order to comply with the minimum reserve requirements (if any), which has included the average value of the gross carrying value of SFT assets as referred to in line 28	19.275.076	18.200.738
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 The value of the Leverage Ratio, including the impact of adjustments to temporary exceptions for placement of current accounts with Bank Indonesia in order to comply with the minimum reserve requirements (if any), which has included the average value of the gross carrying value of SFT assets as referred to in line 28	20,90%	18,27%
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. The value of the Leverage Ratio, excluding the impact of adjustments to temporary exemptions for placement of current accounts with Bank Indonesia in order to comply with the minimum reserve requirements (if any), which has included the average value of the gross carrying value of SFT assets as referred to in line 28	20,90%	18,27%

Pengungkapan Kualitas Kredit atas Aset (CR1) – Bank secara Individual
Disclosure of Asset Credit Quality (CR1) – Bank Individually

dalam jutaan Rupiah | in million Rupiah

Keterangan Description		31 Desember 2025 December 31, 2025						
		Nilai Tercatat Bruto Gross Carrying Value		CKPN Allowance for impairment losses			CKPN (Pendekatan IRB) Allowance for impairment losses (IRB Approach)	Nilai Bersih (a+b-d) Net Receivables (a+b-d)
		Tagihan yang Telah Jatuh Tempo Past Due Receivables	Tagihan yang Belum Jatuh Tempo Non Past Due Receivables	CKPN Allowance for impairment losses	Stage 2 dan Stage 3 Stage 2 and Stage 3	Stage 1		
		a	b	c	d	e	f	g
1	Kredit Loans	28.829	7.322.243	515.056	310.083	204.973	-	7.040.989
2	Surat Berharga Securities	-	7.601.269	2	-	2	-	7.601.269
3	Transaksi Rekening Administratif Administrative Account Transactions	-	-	-	-	-	-	-
4	Total	28.829	14.923.512	515.056	310.083	204.975	-	14.642.258

dalam jutaan Rupiah | in million Rupiah

Keterangan Description		31 Desember 2024 December 31, 2024						
		Nilai Tercatat Bruto Gross Carrying Value		CKPN Allowance for impairment losses			CKPN (Pendekatan IRB) Allowance for impairment losses (IRB Approach)	Nilai Bersih (a+b-d) Net Receivables (a+b-d)
		Tagihan yang Telah Jatuh Tempo Past Due Receivables	Tagihan yang Belum Jatuh Tempo Non Past Due Receivables	CKPN Allowance for impairment losses	Stage 2 dan Stage 3 Stage 2 and Stage 3	Stage 1		
		a	b	c	d	e	f	g
1	Kredit Loans	33.226	8.995.454	635.246	432.214	203.032	-	8.596.466
2	Surat Berharga Securities	-	4.728.901	-	-	-	-	4.728.901
3	Transaksi Rekening Administratif Administrative Account Transactions	-	-	-	-	-	-	-
4	Total	33.226	13.724.355	635.246	432.214	203.032	-	13.325.367

Pengungkapan Mutasi Kredit dan Surat Berharga yang Telah Jatuh Tempo (CR2) – Bank secara Individual
Disclosure of Changes in Overdue Loans and Securities (CR2) – Bank Individually

dalam jutaan Rupiah | in million Rupiah

No	Keterangan Description	31 Desember 2025 December 31, 2025
		a
1	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada periode pelaporan terakhir Past Due Credit and Securities in prior reporting	1.575
2	Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak periode pelaporan terakhir Past Due Credit and Securities since prior reporting	27.254
3	Kredit dan Surat Berharga yang kembali menjadi tagihan yang belum jatuh tempo Credit and Securities Restated to Not Past Due Receivables	-
4	Nilai hapus buku Written-Off	-
5	Perubahan lain Other changes	-
6	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada akhir periode pelaporan (1+2-3-4+5) Past Due Credit and Securities for end of reporting period (1+2-3-4+5)	28.829

dalam jutaan Rupiah | in million Rupiah

No	Keterangan Description	31 Desember 2024 December 31, 2024
		a
1	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada periode pelaporan terakhir Past Due Credit and Securities in prior reporting	1.172
2	Kredit dan Surat Berharga yang Telah Jatuh Tempo sejak periode pelaporan terakhir Past Due Credit and Securities since prior reporting	32.054
3	Kredit dan Surat Berharga yang kembali menjadi tagihan yang belum jatuh tempo Credit and Securities Restated to Not Past Due Receivables	-
4	Nilai hapus buku Written-Off	-
5	Perubahan lain Other changes	-
6	Kredit dan Surat Berharga yang Telah Jatuh Tempo pada akhir periode pelaporan (1+2-3-4+5) Past Due Credit and Securities for end of reporting period (1+2-3-4+5)	33.226

Pengungkapan Tagihan Bersih Berdasarkan Wilayah – Bank secara Individual
Disclosure of Net Receivables by Region – Bank Individually

dalam jutaan Rupiah | in million Rupiah

No	Keterangan Description	31 Desember 2025 December 31, 2025				
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region				
		Jakarta	JABAR, JATENG, JATIM, DIY, BANTEN WestJava, Central Java, East Java, DIY, Banten	Sumatera, Lainnya Sumatera and others	dst. etc.	Total
		(3)	(4)	(5)	(6)	(7)
1	Tagihan Kepada Pemerintah Government Receivables	9.518.442	-	-	-	9.518.442
2	Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	179.784	-	-	-	179.784
3	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Bank and International Institutions Receivables	-	-	-	-	-
4	Tagihan Kepada Bank Bank Receivable	574.839	3	4	-	574.846
5	Tagihan berupa Covered Bonds Covered Bond Claims	-	-	-	-	-
6	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Claims to Securities Companies and Other Financial Services Institutions	642.564	-	-	-	642.564
7	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | Receivables in the form of securities/subordinated receivables, equity and other capital instruments	-	-	-	-	-
8	"Kredit Beragun Rumah Tinggal Residential Mortgage Loans"	1.159	406	-	-	1.565
9	Kredit Beragun Properti Komersial Commercial Property Backed Credit	-	-	-	-	-
10	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Loan for land purchase, land development and construction	-	-	-	-	-
11	Kredit Pegawai/Pensiunan Employee/Retirees Loan	28.157	21.180	27.078	-	76.415
12	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel | Micro Business, Small Business and Retail Portfolio Bills	5.498.036	12.861	888	-	5.511.785
13	Tagihan kepada Korporasi Claims to Corporate	1.171.505	29.649	-	-	1.201.154
14	Tagihan yang Telah Jatuh Tempo Matured Claims	1	2	-	-	3
15	Aset Lainnya | Other Assets	582.004	79.139	9.915	-	671.058
	TOTAL	18.196.491	143.240	37.885	-	18.377.616

dalam jutaan Rupiah | in million Rupiah

No	Keterangan Description	31 Desember 2024 December 31, 2024				
		Tagihan Bersih Berdasarkan Wilayah Net Receivables by Region				
		Jakarta	JABAR, JATENG, JATIM, DIY, BANTEN West Java, Central Java, East Java, DIY, Banten	Sumatera, Lainnya Sumatera and others	dst. etc.	Total
		(8)	(9)	(10)	(11)	(12)
1	Tagihan Kepada Pemerintah Government Receivables	5.941.161	-	-	-	5.941.161
2	Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	55.341	-	-	-	55.341
3	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Bank and International Institutions Receivables	-	-	-	-	-
4	Tagihan Kepada Bank Bank Receivable	80.912	2	2	-	80.916
5	Tagihan berupa Covered Bonds Covered Bond Claims	-	-	-	-	-
6	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Claims to Securities Companies and Other Financial Services Institutions	784.392	-	-	-	784.392
7	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | Receivables in the form of securities/subordinated receivables, equity and other capital instruments	-	-	-	-	-
8	"Kredit Beragun Rumah Tinggal Residential Mortgage Loans"	1.275	706	-	-	1.981
9	Kredit Beragun Properti Komersial Commercial Property Backed Credit	-	-	-	-	-
10	Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Loan for land purchase, land development and construction	-	-	-	-	-
11	Kredit Pegawai/Pensiunan Employee/Retirees Loan	41.138	30.617	39.969	-	111.724
12	Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel | Micro Business, Small Business and Retail Portfolio Bills	6.019.797	15.460	-	-	6.035.257
13	Tagihan kepada Korporasi Claims to Corporate	1.791.435	31.445	-	-	1.822.880
14	Tagihan yang Telah Jatuh Tempo Matured Claims	7.300	-	-	-	7.300
15	Aset Lainnya | Other Assets	651.492	85.282	8.263	-	745.037
	TOTAL	15.374.243	163.512	48.234	-	15.585.989

Pengungkapan Tagihan Bersih Berdasarkan Sektor Ekonomi – Bank secara Individual
Disclosure of Net Receivables by Economic Sector – Bank Individually

No	Sektor Ekonomi Economic Sector	Tagihan Kepada Pemerintah Government Receivables	Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Banks and International Institutions Receivables	Tagihan Kepada Bank Bank Receivables	Tagihan berupa Covered Bonds Receivables by Covered Bond
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1	Pertanian, Kehutanan dan Perikanan Agriculture, Forestry, and Fishing	-	-	-	-	-
2	Pertambangan dan Penggalian Mining and Quarrying	-	-	-	-	-
3	Industri Pengolahan | Manufacturing	-	-	-	-	-
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Electricity, Gas, Steam/Hot Water, and Air Conditioning Supply	-	-	-	-	-
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi Water Supply, Sewerage, Waste Management and Recycling, and Remediation Activities	-	-	-	-	-
6	Konstruksi | Construction	-	-	-	-	-
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Repair and Maintenance of Motor Vehicles and Motorcycles	-	-	-	-	-
8	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-	-
9	Penyediaan Akomodasi dan Penyediaan Makan Minum Accommodation and Food Service Activities	-	-	-	-	-
10	Informasi dan Komunikasi Information and Communication	-	-	-	-	-
11	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	9.518.442	179.784	-	574.846	-
12	Real Estat | Real Estate	-	-	-	-	-
13	Aktivitas Profesional, Ilmiah dan Teknis Professional, Scientific, and Technical Activities	-	-	-	-	-
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | Rental and Leasing Activities Without Option Rights, Employment, Travel Agencies, and Other Business Support Activities	-	-	-	-	-
15	Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | Public Administration, Defense, and Mandatory Social Security	-	-	-	-	-
16	Pendidikan | Education	-	-	-	-	-
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health and Social Work Activities	-	-	-	-	-
18	Kesenian, Hiburan dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-	-
19	Aktivitas Jasa Lainnya | Other Service Activities	-	-	-	-	-

dalam jutaan Rupiah | in million Rupiah

Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Claims to Securities Companies and Other Financial Services Institutions	**Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya** Receivables in the form of securities/ subordinated receivables, equity and other capital instruments	**Kredit Beragun Rumah Tinggal** Residential Mortgage Loans	**Kredit Beragun Properti Komersial** Commercial Property Backed Credit	**Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Loans for land purchase, land development and construction	**Kredit Pegawai/Pensiunan** Employee/Retirees Loans	**Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel** Micro Business, Small Business and Retail Portfolio Claims	**Tagihan kepada Korporasi** Claims to Corporate	**Tagihan yang Telah Jatuh Tempo** Matured Claims	**Aset Lainnya** Other Assets
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	258.148	-	-
-	-	-	-	-	-	-	82.989	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	38.605	11.044	389.383	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	9.705	-	-
642.564	-	-	-	-	-	-	418.468	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	19.944	-	-
-	-	-	-	-	-	-	22.517	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	14	-	-	-

No	Sektor Ekonomi Economic Sector	Tagihan Kepada Pemerintah Government Receivables	Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Banks and International Institutions Receivables	Tagihan Kepada Bank Bank Receivables	Tagihan berupa Covered Bonds Receivables by Covered Bond
(1)	(2)	(3)	(4)	(5)	(6)	(7)
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 Employers; Activities Producing Goods and Services by Households for Their Own Use	-	-	-	-	-
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya Activities of International Organizations and Other Extra-International Bodies	-	-	-	-	-
22	Rumah Tangga Households	-	-	-	-	-
23	Bukan Lapangan Usaha Lainnya Other Non-Business Sectors	-	-	-	-	-
24	Lainnya Other	-	-	-	-	-
	Total	9.518.442	179.784	-	574.846	-

No	Sektor Ekonomi Economic Sector	Tagihan Kepada Pemerintah Government Receivables	Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Banks and International Institutions Receivables	Tagihan Kepada Bank Bank Receivables	Tagihan berupa Covered Bonds Receivables by Covered Bond
(1)	(2)	(3)	(4)	(5)	(6)	(7)
1	Pertanian, Kehutanan dan Perikanan Agriculture, Forestry, and Fishing	-	-	-	-	-
2	Pertambangan dan Penggalian Mining and Quarrying	-	-	-	-	-
3	Industri Pengolahan | Manufacturing	-	-	-	-	-
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Electricity, Gas, Steam/Hot Water, and Air Conditioning Supply	-	-	-	-	-
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi Water Supply, Sewerage, Waste Management and Recycling, and Remediation Activities	-	-	-	-	-
6	Konstruksi | Construction	-	-	-	-	-
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Repair and Maintenance of Motor Vehicles and Motorcycles	-	-	-	-	-

dalam jutaan Rupiah | in million Rupiah

Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Claims to Securities Companies and Other Financial Services Institutions	**Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya** Receivables in the form of securities/ subordinated receivables, equity and other capital instruments	**Kredit Beragun Rumah Tinggal** Residential Mortgage Loans	**Kredit Beragun Properti Komersial** Commercial Property Backed Credit	**Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Loans for land purchase, land development and construction	**Kredit Pegawai/Pensiunan** Employee/Retirees Loans	**Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel** Micro Business, Small Business and Retail Portfolio Claims	**Tagihan kepada Korporasi** Claims to Corporate	**Tagihan yang Telah Jatuh Tempo** Matured Claims	**Aset Lainnya** Other Assets
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-
-	-	1.565	-	-	37.810	5.500.727	-	3	-
-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	671.058
642.564	-	1.565	-	-	76.415	5.511.785	1.201.154	3	671.058

dalam jutaan Rupiah | in million Rupiah

Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Claims to Securities Companies and Other Financial Services Institutions	**Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya** Receivables in the form of securities/ subordinated receivables, equity and other capital instruments	**Kredit Beragun Rumah Tinggal** Residential Mortgage Loans	**Kredit Beragun Properti Komersial** Commercial Property Backed Credit	**Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Loans for land purchase, land development and construction	**Kredit Pegawai/Pensiunan** Employee/Retirees Loans	**Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel** Micro Business, Small Business and Retail Portfolio Claims	**Tagihan kepada Korporasi** Claims to Corporate	**Tagihan yang Telah Jatuh Tempo** Matured Claims	**Aset Lainnya** Other Assets
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
-		-	-	-	-	-	-	-	-
-		-	-	-	-	135.103	-	-	-
-		-	-	-	1.602	914.457	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	55.539	136	18.651	7.281	-	-

No	Sektor Ekonomi Economic Sector	Tagihan Kepada Pemerintah Government Receivables	Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Banks and International Institutions Receivables	Tagihan Kepada Bank Bank Receivables	Tagihan berupa Covered Bonds Receivables by Covered Bond
(1)	(2)	(3)	(4)	(5)	(6)	(7)
8	Pengangkutan dan Pergudangan Transportation and Warehousing	-	-	-	-	-
9	Penyediaan Akomodasi dan Penyediaan Makan Minum Accommodation and Food Service Activities	-	-	-	-	-
10	Informasi dan Komunikasi Information and Communication	-	-	-	-	-
11	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	5.941.161	55.341		80.916	-
12	Real Estat | Real Estate	-	-	-	-	-
13	Aktivitas Profesional, Ilmiah dan Teknis Professional, Scientific, and Technical Activities	-	-	-	-	-
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya | Rental and Leasing Activities Without Option Rights, Employment, Travel Agencies, and Other Business Support Activities	-	-	-	-	-
15	Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib | Public Administration, Defense, and Mandatory Social Security	-	-	-	-	-
16	Pendidikan | Education	-	-	-	-	-
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health and Social Work Activities	-	-	-	-	-
18	Kesenian, Hiburan dan Rekreasi Arts, Entertainment, and Recreation	-	-	-	-	-
19	Aktivitas Jasa Lainnya | Other Service 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 Employers; Activities Producing Goods and Services by Households for Their Own Use	-	-	-	-	-
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya Activities of International Organizations and Other Extra-International Bodies	-	-	-	-	-
22	Rumah Tangga Households	-	-	-	-	-
23	Bukan Lapangan Usaha Lainnya Other Non-Business Sectors	-	-	-	-	-
24	Lainnya Other	-	-	-	-	-
	Total	5.941.161	55.341	-	80.916	-

dalam jutaan Rupiah | in million Rupiah

Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya Claims to Securities Companies and Other Financial Services Institutions	**Tagihan berupa Surat Berharga/ Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya** Receivables in the form of securities/ subordinated receivables, equity and other capital instruments	**Kredit Beragun Rumah Tinggal** Residential Mortgage Loans	**Kredit Beragun Properti Komersial** Commercial Property Backed Credit	**Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi** Loans for land purchase, land development and construction	**Kredit Pegawai/Pensiunan** Employee/Retirees Loans	**Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel** Micro Business, Small Business and Retail Portfolio Claims	**Tagihan kepada Korporasi** Claims to Corporate	**Tagihan yang Telah Jatuh Tempo** Matured Claims	**Aset Lainnya** Other Assets
(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
-		-	-	-	-	200.016	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	8.519	11.480	-	-	-
784.392		-	-	-	-	520.223	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	22.950	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	3	-	-	-	-
-		-	-	-	14	-	-	-	-
-		-	-	-	-	-	-	-	-
-		1.980	-	56.185	6.024.984	-	19	-	-
-		-	-	-	-	-	-	-	-
-		-	-	-	-	-	-	745.037	-
784.392		1.980	-	111.724	6.035.258	1.822.880	7.300	745.037	-

Pengungkapan Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak – Bank secara Individual
Disclosure of Net Receivables by Remaining Contract Term – Bank Individually

Kategori Portofolio Portfolio Category	31 Desember 2025 | December 31, 2025			
	Tagihan bersih berdasarkan sisa jangka waktu kontrak Net receivables by remaining contract period			
	< 1 tahun ≤ 1 year	> 1 thn s.d. 3 thn >1 up to 3 years	> 3 thn s.d. 5 thn >3 up to 5 years	> 5 thn > 5 years
(1) (2)	(3)	(4)	(5)	(6)
1 Tagihan Kepada Pemerintah Government Receivables	7.553.336	72.325	204.142	1.688.638
2 Tagihan Kepada Entitas Sektor Publik Public Sector Entities Receivables	164.685	15.099	-	-
3 Tagihan Kepada Bank Pembangunan Multilateral dan Lembaga Internasional Multilateral Development Bank and International Institutions Receivables	-	-	-	-
4 Tagihan Kepada Bank Bank Receivable	520.251	-	-	-
5 Tagihan berupa Covered Bonds Covered Bond Claims	-	-	-	-
6 Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lainnya | Claims to Securities Companies and Other Financial Services Institutions	172.542	414.102	55.920	-
7 Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya | Receivables in the form of securities/subordinated receivables, equity and other capital instruments	-	-	-	-
8 Kredit Beragun Rumah Tinggal Residential Mortgage Loans	-	407	89	1.069
9 Kredit Beragun Properti Komersial Commercial Property Backed Credit	-	-	-	-
10 Kredit untuk Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Loan for land purchase, land development and construction	-	-	-	-
11 Kredit Pegawai/Pensiunan Employee/Retirees Loan	-	4.882	13.496	58.037
12 Tagihan Kepada Usaha Mikro, Usaha Kecil dan Portofolio Ritel | Micro Business, Small Business and Retail Portfolio Bills	186.532	5.137.379	41.481	146.393
13 Tagihan kepada Korporasi Claims to Corporate	-	1.002.505	196.966	-
14 Tagihan yang Telah Jatuh Tempo Matured Claims	3	-	-	-
15 Aset Lainnya | Other Assets	-	-	-	-
Total	8.597.349	6.646.699	512.094	1.894.137

Pengungkapan Tagihan Bersih Berdasarkan Sisa Jangka Waktu Kontrak

1. Pengungkapan tagihan bersih mencakup eksposur aset dalam laporan posisi keuangan, eksposur pada transaksi rekening administratif, serta eksposur yang menimbulkan risiko kredit akibat kegagalan pihak lawan (*counterparty credit risk*).
2. Klasifikasi portofolio dan perhitungan tagihan bersih mengacu pada ketentuan perhitungan Aset Tertimbang Menurut Risiko (ATMR) untuk Risiko Kredit dengan Pendekatan Standar.
3. Pemetaan ke dalam skala waktu dilakukan berdasarkan sisa jangka waktu hingga jatuh tempo sesuai kontrak untuk pos laporan posisi keuangan, transaksi rekening administratif, serta eksposur risiko kredit yang memiliki jatuh tempo kontraktual. Sementara itu, eksposur tanpa jatuh tempo kontraktual (*non-maturity items*) disajikan dalam kolom non-kontraktual.

dalam jutaan Rupiah | in million Rupiah

		**31 Desember 2024	** December 31, 2024					
		Tagihan bersih berdasarkan sisa jangka waktu kontrak Net receivables by remaining contract period					
Non Kontraktual Non Contractual	**Total**	**< 1 tahun** ≤ 1 year	**> 1 thn s.d. 3 thn** >1 up to 3 years	**> 3 thn s.d. 5 thn** >3 up to 5 years	**> 5 thn** > 5 years	**Non Kontraktual** Non Contractual	**Total**
(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
-	9.518.441	1.888.672	149.632	19.631	2.453.130	1.430.096	5.941.161
-	179.784	-	55.341	-	-	-	55.341
-	-	-	-	-	-	-	-
54.595	574.846	127	-	-	-	80.789	80.916
-	-	-	-	-	-	-	-
-	642.564	276.809	380.356	127.227	-	-	784.392
-	-	-	-	-	-	-	-
-	1.565	-	706	118	1.156	-	1.980
-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-
-	76.415	1.466	11.561	20.633	78.064	-	111.724
-	5.533.892	5.632.159	102.615	70.131	230.353	-	6.035.258
1.683	1.179.048	1.556.617	261.189	-	-	5.074	1.822.880
-	3	7.300	-	-	-	-	7.300
671.058	671.058	-	-	-	-	-	-
727.336	18.377.616	9.363.150	961.400	237.740	2.762.703	1.515.959	14.840.952

Disclosure of Net Claims by Remaining Contractual Maturity

1. The disclosure of net claims includes asset exposures in the statement of financial position, exposures in administrative account transactions, and exposures giving rise to credit risk due to counterparty default (counterparty credit risk).
2. Portfolio classification and net exposure calculation are based on the Risk-Weighted Asset (RWA) calculation requirements for Credit Risk under the Standardized Approach.
3. Maturity mapping is based on the remaining contractual maturity for balance sheet items, administrative account transactions, and credit risk exposures with contractual maturities. Meanwhile, exposures without contractual maturities (non-maturity items) are presented in the non-contractual column.

Pengungkapan Tagihan Bersih Berdasarkan Wilayah - Bank secara Individual
Disclosure of Net Receivables by Region - Bank Individually

No	Keterangan Description	31 Desember 2025 December 31, 2025			
		Wilayah Region			
		JAKARTA	JABAR, JATENG, JATIM, DIY, BANTEN West Java, Central Java, East Java, DIY, Banten	SUMATERA, Lainnya Sumatera and others	Dst. Etc.
(1)	(2)	(3)	(4)	(5)	(6)
1	Tagihan Receivables	18.502.522	144.208	40.969	-
2	Tagihan yang Mengalami Penurunan Nilai Impairment losses on Receivables	18.502.522	144.208	40.969	-
	a. Belum jatuh tempo Not yet due	18.502.521	144.206	40.969	-
	b. Telah jatuh tempo Past due	1	2	-	-
3	CKPN - Stage 1	203.637	1.815	1.206	-
4	CKPN - Stage 2	113.955	243	2.428	-
5	CKPN - Stage 3	192.076	725	656	-
6	Tagihan yang dihapus buku Deleted book claims	6.612.055	81.943	41.727	-

Pengungkapan Tagihan dan Pencadangan Berdasarkan Wilayah

1. Tagihan merupakan nilai tercatat aset keuangan dalam laporan posisi keuangan sebelum dikurangi Cadangan Kerugian Penurunan Nilai (CKPN) atau disajikan secara bruto.
2. Definisi penurunan nilai serta perhitungan CKPN aset keuangan mengacu pada standar akuntansi keuangan yang berlaku.
3. Pembagian wilayah ditetapkan berdasarkan kebijakan masing-masing Bank dan disajikan sesuai laporan manajemen, dengan minimal mencakup tiga wilayah utama serta rincian masing-masing wilayah.
4. Penentuan wilayah dilakukan berdasarkan lokasi proyek debitur.

Disclosure of Receivables and Allowances by Region

1. Receivables represent the carrying amount of financial assets in the statement of financial position before being deducted by Allowance for Impairment Losses (CKPN) or presented as gross.
2. The definition of impairment and the calculation of CKPN for financial assets refer to applicable financial accounting standards.
3. Regional divisions are determined based on each Bank's policies and presented in accordance with management reports, covering at least three main regions and details for each region.
4. Regional determination is based on the location of the debtor's project.

dalam jutaan Rupiah | in million Rupiah

	31 Desember 2024 December 31, 2024				
	Wilayah Region				
Total	**JAKARTA**	**JABAR, JATENG, JATIM, DIY, BANTEN** West Java, Central Java, East Java, DIY, Banten	**SUMATERA, Lainnya** Sumatera and others	**Dst.** Etc.	**Total**
(7)	(8)	(9)	(10)	(11)	(12)
18.687.699	15.775.964	176.200	66.285	-	16.018.449
18.687.699	15.775.964	176.200	66.285	-	16.018.449
18.687.696	15.744.588	174.555	66.081	-	15.985.224
3	31.376	1.645	204	-	33.225
206.658	375.118	2.148	853	-	378.119
116.626	143.283	431	892	-	144.606
193.457	258.438	12.257	17.159	-	287.854
6.735.725	2.103.129	5.415	2.566		2.111.110

5. Tagihan yang telah jatuh tempo mengacu pada definisi kategori portofolio tagihan jatuh tempo sesuai ketentuan Otoritas Jasa Keuangan mengenai perhitungan ATMR Risiko Kredit dengan Pendekatan Standar.
6. Tagihan yang dihapus buku merupakan tagihan yang telah dilakukan penghapus-bukuan selama periode berjalan.

5. Overdue receivables refer to the definition of the overdue receivables portfolio category in accordance with the Financial Services Authority's regulations regarding the calculation of RWA for Credit Risk using the Standardized Approach.
6. Written-off receivables are receivables that have been written off during the current period.

Pengungkapan Tagihan dan Pencadangan Berdasarkan Sektor Ekonomi (CRB-5) – Bank secara Individual
Disclosure of Receivables and Provisions by Economic Sector (CRB-5) – Bank Individually

Pengungkapan ini menyajikan informasi mengenai distribusi tagihan dan pencadangan Perseroan berdasarkan sektor ekonomi. Penyajian dilakukan untuk memberikan gambaran profil risiko kredit Bank secara lebih komprehensif serta mendukung transparansi pengelolaan risiko pada masing-masing sektor usaha.

No.	Sektor Ekonomi Economic Sectors	Tagihan Receivables
(1)	(2)	(3)
	31 Desember 2025 December 31, 2025	
1	Pertanian, Kehutanan dan Perikanan Agriculture, Forestry, and Fisheries	-
2	Pertambangan dan Penggalian Mining and Quarrying Industries	258.148
3	Industri Pengolahan Processing Industries	82.989
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/Hot Water and Cold Water	-
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi Water Management, Waste Water Management, Waste Management and Recycling	-
6	Konstruksi Construction	-
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	439.032
8	Pengangkutan dan Pergudangan Transportation and Werehousing	-
9	Penyediaan Akomodasi dan Penyediaan Makan Minum Hotel and Food & Beverage	-
10	Informasi dan Komunikasi Information and Communication	9.705
11	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	11.334.104
12	Real Estate Real Estate	-
13	Aktivitas Profesional, Ilmiah dan Teknis Professional, Scientific, and Technical Activities	19.944
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya Leasing and Leasing Without Option Right, Employment, Travel Agencies, and Other Business Support Activities	22.517
15	Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib Public Administration, Defense And Compulsory Social Security	-

This disclosure presents information regarding the distribution of the Company's receivables and provisions by economic sector. The presentation is intended to provide a more comprehensive overview of the Bank's credit risk profile and to support transparency in risk management across each business sector.

dalam jutaan Rupiah | in million Rupiah

Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan kerugian penurunan nilai (CKPN) -Stage 1 Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) -Stage 2 Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) -Stage 3 Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Written-Off Receivables
Belum Jatuh Tempo Non Past Due	**Telah jatuh tempo** Past Due				
(4)	(5)	(6)	(7)		(8)
-		-	-	-	76.288
258.148	-	8.102	-	64.593	-
82.989		50.832	-	-	38.194
-		-	-	-	-
-		-	-	-	-
-		-	-	-	74.519
439.032	-	47.551	2.750	29.509	270.656
-	-	-	-	-	137.859
-	-	-	-	-	60
9.705	-	420	-	-	15.226
11.334.104	-	18.611	-	-	8.293
-	-	-	-	-	186
19.944	-	316	-	-	5.165
22.517	-	288	-	-	939
-	-	-	-	-	-

No.	Sektor Ekonomi Economic Sectors	Tagihan Receivables
(1)	(2)	(3)
16	Pendidikan Education Services	-
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health and Social Work Activities	-
18	Kesenian, Hiburan dan Rekreasi Art, Entertainment, and Leisure Activities	-
19	Aktivitas Jasa Lainnya Other Service Activities	14
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 Employer; Activities which Generate Products or Services by Household, Use for Fulfilling Self-Needs	-
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International institution and Other Extra International Agency Activities	-
22	Rumah Tangga Household Activities	5.540.105
23	Bukan Lapangan Usaha Lainnya Non-Business Field	-
24	Lainnya Others	671.058
	Total	18.377.616

No.	Sektor Ekonomi Economic Sectors	Tagihan Receivables
(1)	(2)	(3)
	31 Desember 2024 December 31, 2024	
1	Pertanian, Kehutanan dan Perikanan Agriculture, Forestry, and Fisheries	-
2	Pertambangan dan Penggalian Mining and Quarrying Industries	135.103
3	Industri Pengolahan Processing Industries	916.059
4	Pengadaan Listrik, Gas, Uap/Air Panas dan Udara Dingin Procurement of Electricity, Gas, Steam/Hot Water and Cold Water	-
5	Pengelolaan Air, Pengelolaan Air Limbah, Pengelolaan dan Daur Ulang Sampah, dan Aktivitas Remediasi Water Management, Waste Water Management, Waste Management and Recycling	-

dalam jutaan Rupiah | in million Rupiah

Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan kerugian penurunan nilai (CKPN) -Stage 1 Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) -Stage 2 Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) -Stage 3 Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Written-Off Receivables
Belum Jatuh Tempo Non Past Due	Telah jatuh tempo Past Due				
(4)	(5)	(6)	(7)		(8)
-	-	-	-	-	29
-	-	-	-	-	26
-	-	-	-	-	43
14	-	-	-	-	840
-	-	-	-	-	-
-		-	-	-	-
5.540.102	3	80.537	113.876	99.355	5.914.457
-		-	-	-	-
671.058	-	-	-	-	192.945
18.377.613	3	206.657	116.626	193.457	6.735.725

dalam jutaan Rupiah | in million Rupiah

Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan kerugian penurunan nilai (CKPN) -Stage 1 Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) -Stage 2 Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) -Stage 3 Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Written-Off Receivables
Belum Jatuh Tempo Non Past Due	Telah jatuh tempo Past Due				
(4)	(5)	(6)	(7)		(8)
-	-	-	-	-	75.288
135.103	-	3.754	-	-	-
916.059		44.799	-	-	38.496
-	-	-	-	-	-
-	-	-	-	-	-

No.	Sektor Ekonomi Economic Sectors	Tagihan Receivables
(1)	(2)	(3)
6	Konstruksi Construction	44.200
7	Perdagangan Besar dan Eceran; Reparasi dan Perawatan Mobil dan Sepeda Motor Wholesale and Retail Trade; Car and Motorcycle Repair and Maintenance	134.039
8	Pengangkutan dan Pergudangan Transportation and Werehousing	200.016
9	Penyediaan Akomodasi dan Penyediaan Makan Minum Hotel and Food & Beverage	-
10	Informasi dan Komunikasi Information and Communication	19.999
11	Aktivitas Keuangan dan Asuransi Financial and Insurance Activities	7.396.456
12	Real Estate Real Estate	-
13	Aktivitas Profesional, Ilmiah dan Teknis Professional, Scientific, and Technical Activities	22.950
14	Aktivitas Penyewaan dan Sewa Guna Usaha Tanpa Hak Opsi, Ketenagakerjaan, Agen Perjalanan dan Penunjang Usaha Lainnya Leasing and Leasing Without Option Right, Employment, Travel Agencies, and Other Business Support Activities	930
15	Administrasi Pemerintahan, Pertahanan dan Jaminan Sosial Wajib Public Administration, Defense And Compulsory Social Security	-
16	Pendidikan Education Services	-
17	Aktivitas Kesehatan Manusia dan Aktivitas Sosial Human Health and Social Work Activities	-
18	Kesenian, Hiburan dan Rekreasi Art, Entertainment, and Leisure Activities	-
19	Aktivitas Jasa Lainnya Other Service Activities	3
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 Employer; Activities which Generate Products or Services by Household, Use for Fulfilling Self-Needs	14
21	Aktivitas Badan Internasional dan Badan Ekstra Internasional Lainnya International institution and Other Extra International Agency Activities	-
22	Rumah Tangga Household Activities	6.417.820
23	Bukan Lapangan Usaha Lainnya Non-Business Field	-
24	Lainnya Others	904.264
	Total	16.191.853

dalam jutaan Rupiah | in million Rupiah

Tagihan yang Mengalami Penurunan Nilai Impaired Receivables		Cadangan kerugian penurunan nilai (CKPN) -Stage 1 Allowance for Impairment Losses - Stage 1	Cadangan kerugian penurunan nilai (CKPN) -Stage 2 Allowance for Impairment Losses - Stage 2	Cadangan kerugian penurunan nilai (CKPN) -Stage 3 Allowance for Impairment Losses - Stage 3	Tagihan yang dihapus buku Written-Off Receivables
Belum Jatuh Tempo Non Past Due	**Telah jatuh tempo** Past Due				
(4)	(5)	(6)	(7)		(8)
44.200	-	-	-	44.200	41.774
133.515	524	1.575	1.131	51.301	49.240
200.016	-	1.362	-	-	23
-	-	-	-	-	60
19.999	-	989	-	-	9
7.396.456	-	50.862	-	14.423	6.235
-	-	-	-	-	-
22.950	-	157	-	-	83
930	-	-	-	930	9
-	-	-	-	-	-
-	-	-	-	-	29
-	-	-	-	-	2.026
-	-	-	-	-	41
3	-	-	-	-	835
14	-	-	-	-	-
-		-	-	-	-
6.417.172	648	99.534	143.475	191.177	4.731.114
-		-	-	-	-
904.264	-	-	-	159.227	344.454
16.190.681	1.172	203.032	144.606	461.258	5.289.717

Pengungkapan Tagihan Berdasarkan Hari Tunggakan – Bank secara Individual
Disclosure of Receivables by Days Past Due – Bank Individually

Informasi ini menguraikan posisi tagihan Perseroan berdasarkan klasifikasi hari tunggakan guna mencerminkan kualitas kredit dan efektivitas pengelolaan penagihan. Pengelompokan dilakukan sesuai dengan ketentuan yang berlaku untuk memudahkan pemantauan potensi risiko kredit.

This information details the Company's loan positions based on delinquency day classifications to reflect credit quality and the effectiveness of collection management. The grouping is conducted in accordance with applicable regulations to facilitate monitoring of potential credit risks.

dalam jutaan Rupiah | in million Rupiah

No.	Jenis Eksposur Exposure Class	31 Desember 2025 December 31, 2025			
		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
(a)	(b)	(c)	(d)	(e)	(f)
1	Kredit yang termasuk dalam Tagihan yang Telah Jatuh Tempo Credit include to Past Due Receivables	3	-	28.826	28.829
2	Surat Berharga yang termasuk dalam Tagihan yang Telah Jatuh Tempo Securities include to Past Due Receivables	-	-	-	-
	TOTAL	3	-	28.826	28.829

dalam jutaan Rupiah | in million Rupiah

No.	Jenis Eksposur Exposure Class	31 Desember 2024 December 31, 2024			
		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
(a)	(b)	(c)	(d)	(e)	(f)
1	Kredit yang termasuk dalam Tagihan yang Telah Jatuh Tempo Credit include to Past Due Receivables	49	29.733	3.443	33.225
2	Surat Berharga yang termasuk dalam Tagihan yang Telah Jatuh Tempo Securities include to Past Due Receivables	-	-	-	-
	TOTAL	49	29.733	3.443	33.225

Pengungkapan Aset *Performing dan Non-Performing* (CRB-A1) – Bank secara Individual
Disclosure of Performing and Non-Performing Assets (CRB-A1) – Individual Banks

Pengungkapan ini menggambarkan komposisi aset produktif Perseroan yang berada dalam kategori *performing* dan *non-performing*. Informasi tersebut digunakan sebagai indikator kualitas aset serta sebagai dasar dalam penilaian kecukupan pencadangan dan manajemen risiko kredit.

This disclosure illustrates the composition of the Company's performing assets categorized as performing and non-performing. This information serves as an indicator of asset quality and as a basis for assessing the adequacy of provisions and credit risk management.

		31 Desember 2025 | December 31, 2025							
		Performing (Kualitas L dan DPK) Performing (Current and Special Mention Quality)		Non Performing (Kualitas KL, D, M)					
				Tagihan yang Mengalami Penurunan Nilai Impaired Loss Receivables		Tagihan yang Tidak Mengalami Penurunan Nilai Unimpaired Loss Receivables			
						Memiliki Tunggakan >90 Hari Due date > 90 days		Memiliki Tunggakan ≤90 Hari Due date ≤ 90 days	
		Nilai Tercatat BrutoGross Carrying Value	CKPN Allowance for impairment losses	Nilai Tercatat BrutoGross Carrying Value	CKPN Allowance for impairment losses	Nilai Tercatat Bruto Gross Carrying Value	CKPN Allowance for impairment losses	Nilai Tercatat BrutoGross Carrying Value	CKPN Allowance for impairment losses
		a	b	c	d	e	f	g	h
1	Surat Berharga Securities	-	-	-	-	-	-	-	-
2	Kredit Credit								
	a. Korporasi Corporate	1.420.813	122.684	123.566	93.158	-	-	-	-
	b. Ritel Retail	5.673.191	198.915	133.510	100.299	-	-	-	-
3	Transaksi Rekening Administratif Other Off Balance Sheet	-	-	-	-	-	-	-	-

		31 Desember 2024 | December 31, 2024							
		Performing (Kualitas L dan DPK) Performing (Current and Special Mention Quality)		Non Performing (Kualitas KL, D, M)					
				Tagihan yang Mengalami Penurunan Nilai Impaired Loss Receivables		Tagihan yang Tidak Mengalami Penurunan Nilai Unimpaired Loss Receivables			
						Memiliki Tunggakan >90 Hari Due date > 90 days		Memiliki Tunggakan ≤90 Hari Due date ≤ 90 days	
		Nilai Tercatat BrutoGross Carrying Value	CKPN Allowance for impairment losses	Nilai Tercatat BrutoGross Carrying Value	CKPN Allowance for impairment losses	Nilai Tercatat Bruto Gross Carrying Value	CKPN Allowance for impairment losses	Nilai Tercatat BrutoGross Carrying Value	CKPN Allowance for impairment losses
		a	b	c	d	e	f	g	h
1	Surat Berharga Securities	-	-	-	-	-	-	-	-
2	Kredit Credit								
	a. Korporasi Corporate	2.469.917	124.137	45.130	45.130	-	-	-	-
	b. Ritel Retail	6.267.474	245.962	246.156	220.017	-	-	-	-
3	Transaksi Rekening Administratif Other Off Balance Sheet	-	-	-	-	-	-	-	-

Pengungkapan Aset Restrukturisasi *Performing* dan *Non-Performing* – Bank secara Individual
Disclosure of Restructured Performing and Non-Performing Assets – Bank Individually

Bagian ini menyajikan informasi mengenai aset kredit yang telah direstrukturisasi, baik yang masih berkinerja baik *(performing)* maupun yang tergolong bermasalah *(non-performing)*. Pengungkapan dilakukan untuk mencerminkan efektivitas strategi restrukturisasi serta pengelolaan risiko kredit secara berkelanjutan.

		31 Desember 2025 December 31, 2025			
		Performing (Kualitas L dan DPK) Performing (Current and Special Mention Quality)		**Non Performing (Kualitas KL, D, M)** Non Performing (Substandard, Doubtful, and Loss Quality)	
		Nilai Tercatat Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses	**Nilai Tercatat** Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses
		a	**b**	**c**	**d**
1	Surat Berharga Securities	-	-	-	-
2	Kredit Credit				
	a. Korporasi Corporate	-	-	-	-
	b. Ritel Retail	239	237	-	-
3	Transaksi Rekening Administratif Other Off Balance Sheet	-	-	-	-

		31 Desember 2024 December 31, 2024			
		Performing (Kualitas L dan DPK) Performing (Current and Special Mention Quality)		**Non Performing (Kualitas KL, D, M)** Non Performing (Substandard, Doubtful, and Loss Quality)	
		Nilai Tercatat Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses	**Nilai Tercatat** Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses
		a	**b**	**c**	**d**
1	Surat Berharga Securities	-	-	-	-
2	Kredit Credit				
	a. Korporasi Corporate	-	-	44.200	44.200
	b. Ritel Retail	330	9	21.053	21.053
3	Transaksi Rekening Administratif Other Off Balance Sheet	-	-	-	-

This section presents information regarding restructured credit assets, both those that are still performing and those classified as non-performing. The disclosure is provided to reflect the effectiveness of restructuring strategies and the ongoing management of credit risk.

dalam jutaan Rupiah | in million Rupiah

	Stage 1		Stage 2		Stage 3	
	Nilai Tercatat Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses	**Nilai Tercatat** Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses	**Nilai Tercatat** Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses
	e	f	g	h	i	j
	-	-	-	-	-	-
	-	-	-	-	-	-
	239	237	-	-	-	-
	-	-	-	-	-	-

dalam jutaan Rupiah | in million Rupiah

	Stage 1		Stage 2		Stage 3	
	Nilai Tercatat Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses	**Nilai Tercatat** Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses	**Nilai Tercatat** Bruto Gross Carrying Value	**CKPN** Allowance for impairment losses
	e	f	g	h	i	j
	-	-	-	-	-	-
	-	-	-	-	44.200	44.200
	330	9	-	-	21.053	21.053
	-	-	-	-	-	-

Pengungkapan Kuantitatif terkait Teknik MRK (CR3) – Bank secara Individual
Quantitative Disclosure Regarding Credit Risk Mitigation (CRM) Techniques (CR3) – Bank Individually

Pengungkapan kuantitatif ini memuat informasi mengenai penerapan teknik Mitigasi Risiko Kredit (MRK) yang digunakan oleh Perseroan. Data disajikan untuk menunjukkan sejauh mana teknik MRK berkontribusi dalam menurunkan eksposur risiko kredit Bank.

This quantitative disclosure contains information regarding the application of Credit Risk Mitigation (CRM) techniques used by the Company. The data is presented to demonstrate the extent to which CRM techniques contribute to reducing the Bank's credit risk exposure.

dalam jutaan Rupiah | in million Rupiah

No	Keterangan Description	31 Desember 2025 December 31, 2025				
		Tagihan yang Tidak Dijamin dengan Teknik MRK Bills That Are Not Guaranteed Using MRK Techniques	**Tagihan yang Dijamin dengan Teknik MRK** Bills Guaranteed with MRK Techniques	**Tagihan yang Dijamin dengan Agunan** Bills Secured by Collateral	**Tagihan yang Dijamin dengan Garansi, Penjaminan dan/atau Asuransi Kredit** Bills Secured by Guarantee, Guarantee, and Credit Insurance	**Tagihan yang Dijamin dengan Derivatif Kredit** Bills Secured by Credit Derivatives
		a	b	c	d	e
1	Kredit Loans	6.613.380	427.609	427.609	-	-
2	Surat Berharga Securities	7.551.354	49.915	49.915	-	-
3	Total	14.164.734	477.524	477.524	-	-
4	Kredit dan Surat Berharga yang Telah Jatuh Tempo Credit and Securities which have matured	28.829	-	-	-	-

dalam jutaan Rupiah | in million Rupiah

No	Keterangan Description	31 Desember 2024 December 31, 2024				
		Tagihan yang Tidak Dijamin dengan Teknik MRK Bills That Are Not Guaranteed Using MRK Techniques	**Tagihan yang Dijamin dengan Teknik MRK** Bills Guaranteed with MRK Techniques	**Tagihan yang Dijamin dengan Agunan** Bills Secured by Collateral	**Tagihan yang Dijamin dengan Garansi, Penjaminan dan/atau Asuransi Kredit** Bills Secured by Guarantee, Guarantee, and Credit Insurance	**Tagihan yang Dijamin dengan Derivatif Kredit** Bills Secured by Credit Derivatives
		a	b	c	d	e
1	Kredit Loans	8.348.513	247.953	247.953	-	-
2	Surat Berharga Securities	4.679.519	-	49.382	-	-
3	Total	13.028.032	247.953	297.335	-	-
4	Kredit dan Surat Berharga yang Telah Jatuh Tempo Credit and Securities which have matured	33.226	-	-	-	-

Pengungkapan Eksposur Risiko Kredit dan Dampak Teknik MRK (CR4) – Bank secara Individual
Disclosure of Credit Risk Exposure and the Impact of CRM Techniques (CR4) – Bank Individually

Bagian ini menjelaskan eksposur risiko kredit Perseroan setelah memperhitungkan dampak penerapan teknik MRK. Informasi tersebut memberikan gambaran menyeluruh mengenai efektivitas mitigasi risiko yang diterapkan dalam menjaga kualitas portofolio kredit.

	Kategori Portofolio Portfolio Category	
1	Tagihan kepada Pemerintah | Government Claims	
2	Tagihan kepada Entitas Sektor Publik | Claims to Public Sector Entitties	
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Agencies	
4	Tagihan kepada Bank | Bank Claims	
5	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) Claims to Securities Companies and Other Financial Services Institutions1)	
6	Tagihan berupa Covered Bond | Covered Bond Claims	
7	Tagihan kepada Korporasi - Eksposur Korporasi Umum[2] Claims on Corporations - General Corporate Exposure[2]	
8	Eksposur Pembiayaan Khusus[4] | Special Financing Exposure[4]	
9	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of securities/subordinated receivables, equity and other capital instruments	
10	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Micro Business, Small Business and Retail Portfolio Claims	
11	Kredit Beragun Properti | Property Backed Credit	
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Residential Property Secured Loans Where Repayment Is Not Materially Dependent on Property Cash Flows	
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Residential property-backed loans where payments are not materially dependent on property cash flows	
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Commercial property-backed loans where payments are not materially dependent on property cash flows	
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Commercial real estate loans where payments are materially dependent on cash flows from the property	
	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Loans for land acquisition, development and construction	
12	Kredit Pegawai/Pensiunan | Employee/Retired Loans	
13	Tagihan yang Telah Jatuh Tempo | Matured Claims	
14	Aset Lainnya | Other Assets	
15	Total	

This section explains the Company's credit risk exposure after accounting for the impact of CRM technique implementation. This information provides a comprehensive overview of the effectiveness of the risk mitigation measures applied to maintain the quality of the credit portfolio.

31 Desember 2025 | December 31, 2025					
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 average risk weight	
Laporan Posisi Keuangan Financial Position Report	**TRA**	**Laporan Posisi Keuangan** Financial Position Report	**TRA**	**ATMR**	**Rata-Rata Bobot Risiko (e/(c+d))** Average Risk Weight (e/(c+d)
a	b	c	d	e	f
9.518.442	-	-	-	-	0,00%
179.784	-	25.974	-	25.974	100,00%
-	-	-	-	-	0,00%
574.845	-	114.969	-	114.969	100,00%
642.564	680.000	182.284	27.200,00	182.284	87,02%
-	-	-	-	-	0,00%
1.201.154	610.280	763.968	61.028,00	763.968	92,60%
-	-	-	-		0,00%
-	-	-	-	-	0,00%
5.511.785	-	5.505.877	-	5.505.877	100,00%
1.565	-	369	-	369	100,00%
1.565	-	369	-	369	100,00%
-	-	-	-	-	0,00%
-	-	-	-	-	0,00%
-	-	-	-	-	0,00%
-	-	-	-	-	0,00%
76.415		38.207		38.207	100,00%
3	-	5	-	5	100,00%
671.059	-	676.250	-	676.250	0,00%
18.377.616	1.290.280	7.307.903	88.228	7.307.903	

	Kategori Portofolio Portfolio Category	
1	Tagihankepada Pemerintah | Government Claims	
2	Tagihankepada Entitas SektorPublik | Claims to Public Sector Entitties	
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Claims on Multilateral Development Banks and International Agencies	
4	Tagihan kepada Bank | Bank Claims	
5	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) Claims to Securities Companies and Other Financial Services Institutions1)	
6	Tagihan berupa Covered Bond | Covered Bond Claims	
7	Tagihan kepada Korporasi - Eksposur Korporasi Umum[2] Claims on Corporations - General Corporate Exposure[2]	
8	Eksposur Pembiayaan Khusus[4] Special Financing Exposure[4]	
9	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the form of securities/subordinated receivables, equity and other capital instruments	
10	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Micro Business, Small Business and Retail Portfolio Claims	
11	Kredit Beragun Properti Property Backed Credit	
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Residential Property Secured Loans Where Repayment Is Not Materially Dependent on Property Cash Flows	
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Residential property-backed loans where payments are not materially dependent on property cash flows	
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Commercial property-backed loans where payments are not materially dependent on property cash flows	
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Commercial real estate loans where payments are materially dependent on cash flows from the property	
	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi Loans for land acquisition, development and construction	
12	Kredit Pegawai/Pensiunan Employee/Retired Loans	
13	Tagihan yang Telah Jatuh Tempo | Matured Claims	
14	Aset Lainnya | Other Assets	
15	Total	

	31 Desember 2024 | December 31, 2024					
	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 average risk weight	
	Laporan Posisi Keuangan Financial Position Report	**TRA**	**Laporan Posisi Keuangan** Financial Position Report	**TRA**	**ATMR**	**Rata-Rata Bobot Risiko (e/(c+d))** Average Risk Weight (e/(c+d)
	a	b	c	d	e	f
	5.941.161	-	-	-	-	0,00%
	55.341	-	1.192	-	1.192	100,00%
	-	-	-	-	-	0,00%
	80.916	-	16.183	-	16.183	100,00%
	784.392	-	306.705	-	306.705	100,00%
	-	-	-	-	-	0,00%
	1.822.880	6.282	1.610.902	628,00	1.610.902	99,96%
	-	-	-	-		0,00%
	-	-	-	-	-	0,00%
	6.035.258	1.382	6.026.490	118	6.026.490	100,00%
	1.980	-	807	-	807	100,00%
	-	-	-	-	-	0,00%
	-	-	-	-	-	0,00%
	1.980	-	807	-	807	100,00%
	-	-	-	-	-	0,00%
	-	-	-	-	-	0,00%
	111.724		55.862		55.862	100,00%
	7.300	-	3.657	-	3.657	100,00%
	745.037	-	-	-	-	0,00%
	15.585.989	7.664	8.021.798	746	8.021.798	

Tabel Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5)
Disclosure Table of Exposures by Asset Class and Risk Weight (CR5)

Periode: 31 Desember 2025
1) Bank secara Individu

No	Kategori Portofolio Portfolio Category	0%	20%	50%	
1	Tagihan kepada Pemerintah Receivables on Sovereigns	9.518.442	-	-	
	Kategori Portofolio Portfolio Category	**20%**	**50%**		**100%**
2	Tagihan kepada Entitas Sektor Publik Receivables on Public Sector Entities	179.784	-		-
	Kategori Portofolio Portfolio Category	**0%**	**20%**	**30%**	**50%**
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables on Multilateral Development Banks and International Institutions	-	-	-	-
	Kategori Portofolio Portfolio Category	**20%**	**30%**	**40%**	**50%**	**75%**
4	Tagihan kepada Bank Receivables on Banks	574.845	-	-	-	-
	Kategori Portofolio Portfolio Category	**20%**	**30%**	**40%**	**50%**	**75%**
5	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain[1] Receivables to Securities Companies and Other Financial Services Institutions[1]	368.709	-	273.855	-	-
	Kategori Portofolio Portfolio Category	**10%**	**15%**	**20%**	**25%**	**35%**

dalam jutaan Rupiah | in million Rupiah

100%	**150%**		**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-	-		-	-
	150%		**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-		-	25.974
	100%	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	-
	100%	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	114.969
	100%	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	182.284
	50%	**100%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques

6	Tagihan berupa Covered Bond Receivables by Covered Bond	-	-		-	-	-
	Kategori Portofolio Portfolio Category	**0%**	**10%**	**15%**	**20%**	**25%**	**30%**
7	Kredit Pensiunan/Pegawai Employee/Retired Loans	-	-	-	-	-	-
	Kategori Portofolio Portfolio Category	**20%**	**50%**		**65%)**	**75%**	**80%**
8	Tagihan kepada Korporasi Umum[2] Receivables on Corporate - General Corporate Exposure[2]	20.080	2.025		-	-	-
	Tagihan kepada perusahaan efek dan lembaga jasa keuangan lain[3] Receivables to Securities Companies and Other Financial Services Institutions[3]	-	-		-	-	-
	Eksposur Pembiayaan Khusus[4] Special Financing Exposure[4]	-	-		-	-	-
	Kategori Portofolio Portfolio Category	**100%**			**150%**		**250%**
9	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the Form of Subordinated Securities, Equity, and Other Capital Instruments	-			-		-
	Kategori Portofolio Portfolio Category	**45%**			**75%**		**85%**
10	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables on Micro, Small Business & Retail Portfolio	-			-		11.058

dalam jutaan Rupiah | in million Rupiah

	-		-		-	-

35%	**40%**	**50%**	**75%**	**85%**	**100%**	
-	-	76.414	-	-	-	38.207

85%	**100%**	**130%**	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-	1.179.048	-	-	-	763.968
-	-	-	-	-	-
-	-	-	-	-	-

	400%[5]		**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-		-	-

	100%	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	5.500.727	-	5.505.877

	Kategori Portofolio Portfolio Category	0% [5]	20%	25%	30%	35%	40%	45%
11	Kredit Beragun Properti Loans Secured by Residential Property							
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Loans Secured by Residential Property which is Not Materially Dependent on Property Cash Flow	-	1.001	-	564		-	
	tanpa pendekatan pembagian kredit[5] without Credit Allocation Approach[5]	-	-	-	-		-	
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]		-					
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]	-	-		-		-	
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Loans Secured by Residential Property which is Materially Dependent on Property Cash Flow				-	-		-
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Loans Secured by Commercial Real Estate which is Not Materially Dependent on Property Cash Flow	-			-		-	
	tanpa pendekatan pembagian kredit[5] without Credit Allocation Approach[5]	-	-		-		-	
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]							
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]	-	-		-		-	
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Loans Secured by Commercial Real Estate which is Materially Dependent on Property Cash Flow							

50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-		-	-	-	-		-			-	-	369
-		-	-	-	-		-			-	-	-
											-	-
-		-		-	-		-			-	-	-
	-			-				-		-	-	-
-	-	-		-	-		-			-	-	-
-	-										-	-
	-										-	-
-		-		-	-		-			-	-	-
			-			-			-	-	-	-

	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi[5] Credit for Land Acquisition, Soil Processing, and Construction[5]			
	Kategori Portofolio Portfolio Category	**50%**		**100%**
12	Tagihan yang Telah Jatuh tempo Past Due Receivables	-		-
	Kategori Portofolio Portfolio Category	**0%**	**20%**	
13	Aset Lainnya Other Assets	9.760	-	

Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5) - Bank secara Individu
Disclosure of Exposure Based On Asset Class and Weight Risk (CR5) - Bank only

dalam jutaan Rupiah | in million Rupiah

No	Bobot Risiko Weight Risk	Tagihan Bersih Laporan Posisi Keuangan On Balance Sheet Net Receivable	Tagihan Bersih TRA (sebelum pengenaan FKK) Off Balance Sheet Net Receivable (before Credit Conversion Factor)	Rata-Rata FKK Credit Conversion Factor Average	Tagihan Bersih (Setelah pengenaan FKK dan Teknik MRK) Net Receivable after and Credit Risk Mitigation Credit Conversion Factor Techniques)
1	< 40%	10.673.184	1.290.280	88.228	219.070
2	40% -70%	352.295	-	-	147.762
3	75%	-	-	-	-
4	85%	11.058	-	-	5.149
5	90% -100%	7.311.173	-	-	6.891.064
6	105% -130%	-	-	-	-
7	150%	29.904	-	-	44.857
8	250%	-	-	-	-
9	400%	-	-	-	-
10	1250%	-	-	-	-
11	Total Tagihan Bersih Total Net Receivable	18.377.616	1.290.280	88.228	7.307.902

			-		-	-	-

		150%			**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
		3,00			-	5

	50%	**100%**	**150%**	**1250%**[5]	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	631.398	29.901	-	-	676.250

Periode: 31 Desember 2024
1) Bank secara Individu

No	Kategori Portofolio Portfolio Category	0%	20%	50%	
1	Tagihan kepada Pemerintah Receivables on Sovereigns	5.941.161	-	-	
	Kategori Portofolio Portfolio Category	**20%**	**50%**	**100%**	
2	Tagihan kepada Entitas Sektor Publik Receivables on Public Sector Entities	-	-	-	
	Kategori Portofolio Portfolio Category	**0%**	**20%**	**30%**	**50%**
3	Tagihan kepada Bank Pembangunan Multilateral dan Lembaga Internasional Receivables on Multilateral Development Banks and International Institutions	-	-	-	-
	Kategori Portofolio Portfolio Category	**20%**	**30%**	**40%**	**50%**	**75%**
4	Tagihan kepada Bank Receivables on Banks	80.916	-	-	-	-
	Kategori Portofolio Portfolio Category	**20%**	**30%**	**40%**	**50%**	**75%**
5	Tagihan kepada Perusahaan Efek dan Lembaga Jasa Keuangan Lain1) Receivables to Securities Companies and Other Financial Services Institutions1)	-	-	776.913	7.479	-
	Kategori Portofolio Portfolio Category	**10%**	**15%**	**20%**	**25%**	**35%**
6	Tagihan berupa Covered Bond Receivables by Covered Bond	-	-	-	-	-

dalam jutaan Rupiah | in million Rupiah

100%	**150%**		**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-	-		-	-
	150%		**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-		-	1.192
	100%	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	-
	100%	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	16.183
	100%	**150%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	306.705
	50%	**100%**	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	-

	Kategori Portofolio Portfolio Category	0%	10%	15%	20%	25%	30%
7	Kredit Pensiunan/Pegawai Employee/Retired Loans	-	-	-	-	-	-
	Kategori Portofolio Portfolio Category	**20%**	**50%**		**65%)**	**75%**	**80%**
8	Tagihan kepada Korporasi Umum2) Receivables on Corporate - General Corporate Exposure2)	-	-		-	-	-
	Tagihan kepada perusahaan efek dan lembaga jasa keuangan lain3) Receivables to Securities Companies and Other Financial Services Institutions3)	-	-		-	-	-
	Eksposur Pembiayaan Khusus4) Special Financing Exposure4)	-	-		-	-	-
	Kategori Portofolio Portfolio Category	**100%**			**150%**		**250%**
9	Tagihan berupa Surat Berharga/Piutang Subordinasi, Ekuitas, dan Instrumen Modal Lainnya Receivables in the Form of Subordinated Securities, Equity, and Other Capital Instruments	-	-		-		-
	Kategori Portofolio Portfolio Category	**45%**			**75%**		**85%**
10	Tagihan kepada Usaha Mikro, Usaha Kecil, dan Portofolio Ritel Receivables on Micro, Small Business & Retail Portfolio	-			-		2.726

dalam jutaan Rupiah | in million Rupiah

35%	40%	50%	75%	85%	100%	
-	-	111.724	-	-	-	55.862

85%	100%	130%	150%	Lainnya Others	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-	1.822.880	-	-	-	1.610.902
-	-	-	-	-	-
-	-	-	-	-	-

400%[5)]	Lainnya Others	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-	-	-

100%	Lainnya Others	Tagihan Bersih Setelah FKK dan Teknik MRK Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
6.032.532		6.026.490

	Kategori Portofolio Portfolio Category	0% [5]	20%	25%	30%	35%	40%	45%
11	Kredit Beragun Properti Loans Secured by Residential Property							
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Loans Secured by Residential Property which is Not Materially Dependent on Property Cash Flow	-	1.266	-	596		-	
	tanpa pendekatan pembagian kredit[5] without Credit Allocation Approach[5]	-	-	-	-		-	
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]		-					
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]	-	-		-		-	
	Kredit Beragun Properti Rumah Tinggal yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Loans Secured by Residential Property which is Materially Dependent on Property Cash Flow				-	-		-
	Kredit Beragun Properti Komersial yang Pembayarannya Tidak Bergantung Secara Material pada Arus Kas Properti Loans Secured by Commercial Real Estate which is Not Materially Dependent on Property Cash Flow	-			-		-	
	tanpa pendekatan pembagian kredit[5] without Credit Allocation Approach[5]	-	-		-		-	
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]							
	dengan menggunakan pendekatan pembagian kredit (dijamin)[5] with Credit Allocation Approach (Secured)[5]	-	-		-		-	
	Kredit Beragun Properti Komersial yang Pembayarannya Bergantung Secara Material pada Arus Kas Properti Loans Secured by Commercial Real Estate which is Materially Dependent on Property Cash Flow							
	Kredit Pengadaan Tanah, Pengolahan Tanah, dan Konstruksi[5] Credit for Land Acquisition, Soil Processing, and Construction[5]							

50%	60%	65%[5]	70%	75%	85%	90%	100%	105%	110%	150%	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
-		-	118	-	-		-			-	-	807
-		-	-	-	-		-			-	-	-
											-	-
-		-		-	-		-			-	-	-
	-			-				-		-	-	-
-	-	-		-	-		-			-	-	-
-	-										-	-
	-										-	-
-		-		-	-		-			-	-	-
			-			-			-	-	-	-
							-			-	-	-

	Kategori Portofolio Portfolio Category	**50%**	**100%**
12	Tagihan yang Telah Jatuh tempo Past Due Receivables	7.289	9
	Kategori Portofolio Portfolio Category	**0%**	**20%**
13	Aset Lainnya Other Assets	745.037	-

Pengungkapan Eksposur berdasarkan Kelas Aset dan Bobot Risiko (CR5) - Bank secara Individu
Disclosure of Exposure Based On Asset Class and Weight Risk (CR5) - Bank only

dalam jutaan Rupiah | in million Rupiah

No	Bobot Risiko Weight Risk	Tagihan Bersih Laporan Posisi Keuangan On Balance Sheet Net Receivable	Tagihan Bersih TRA (sebelum pengenaan FKK) Off Balance Sheet Net Receivable (before Credit Conversion Factor)	Rata-Rata FKK Credit Conversion Factor Average	Tagihan Bersih (Setelah pengenaan FKK dan Teknik MRK) Net Receivable after and Credit Risk Mitigation Credit Conversion Factor Techniques)
1	< 40%	6.824.316	7.664	766	17.685
2	40% -70%	903.523		-	366.708
3	75%	-		-	-
4	85%	2.726		-	1.493
5	90% -100%	7.855.421		-	7.635.908
6	105% -130%			-	-
7	150%	3		-	4
8	250%			-	-
9	400%			-	-
10	1250%			-	-
11	Total Tagihan Bersih Total Net Receivable	15.585.989	7.664	766	8.021.798

		150%			**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
		3			-	3.657
	50%	**100%**	**150%**	**1250%**[5]	**Lainnya** Others	**Tagihan Bersih Setelah FKK dan Teknik MRK** Net Receivable after Credit Conversion Factor and Credit Risk Mitigation Techniques
	-	-	-	-	-	-

Pengungkapan Risiko Operasional – Bank secara Individual
Disclosure of Operational Risk – Bank Individually

Laporan Data Kerugian Historis
Historical Loss Data Report

No	Indikator Bisnis (IB) dan komponen IB Business Indicator (BI) and component BI	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024	31 Desember 2023 December 31, 2023
	Batasan minimum untuk suatu kejadian kerugian operasional (loss event) sebesar Rp300.000.000,00 (tiga ratus juta rupiah) atau lebih Minimum limit of an operational loss event of Rp300,000,000.00 (three hundred million Rupiahs) or more			
1	Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan (tanpa pengecualian) Net operational losses after accounting for recoveries (without exception)	4.570	636	986
2	Jumlah terjadinya kerugian risiko operasional Total occurrence of operational risk loss	-	-	-
3	Jumlah kerugian risiko operasional yang dikecualikan Total excluded operational risk loss	-	-	-
4	Jumlah terjadinya kerugian risiko operasional yang dikecualikan Total occurrence of excluded operational risk loss	-	-	-
5	Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan dan kerugian risiko operasional yang dikecualikan Total net operating loss after calculating the recovery value and excluded operational risk losses	4.570	636	986
	Batasan minimum untuk suatu kejadian kerugian operasional (loss event) sebesar Rp1.500.000.000,00 (satu miliar lima ratus juta rupiah) atau lebih Minimum limit of an operational loss event of Rp1,500,000,000.00 (one billion five hundred million Rupiahs) or more			
6	Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan (tanpa pengecualian) Total net operating loss after calculating the recovery value (without exception)	-	-	-
7	Jumlah terjadinya kerugian risiko operasional Total occurrence of operational risk loss	-	-	-
8	Jumlah kerugian risiko operasional yang dikecualikan Total excluded operational risk loss	-	-	-
9	Jumlah terjadinya kerugian risiko operasional yang dikecualikan Total occurrence of excluded operational risk loss	-	-	-
10	Jumlah kerugian operasional bersih setelah memperhitungkan nilai pemulihan dan kerugian risiko operasional yang dikecualikan Total net operating loss after calculating the recovery value and excluded operational risk losses	-	-	-
	Rincian perhitungan modal untuk risiko operasional Details of capital calculation for operational risks			
11	Apakah kerugian digunakan dalam perhitungan FPKI? (Ya/Tidak) Are losses used in calculating the Internal Loss Multiplier (ILM)? (Yes/No)	Tidak		

dalam jutaan Rupiah | in million Rupiah

	31 Desember 2022 December 31, 2022	**31 Desember 2021** December 31, 2021	**31 Desember 2020** December 31, 2020	**31 Desember 2019** December 31, 2019	**31 Desember 2018** December 31, 2018	**31 Desember 2017** December 31, 2017	**31 Desember 2016** December 31, 2016	**Rata-rata 10 Tahun**
	-	-	-	597	-	-	-	679
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	597	-	-	-	679
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-
	-	-	-	-	-	-	-	-

No	Indikator Bisnis (IB) dan komponen IB Business Indicator (BI) and component BI	31 Desember 2025 December 31, 2025	31 Desember 2024 December 31, 2024	31 Desember 2023 December 31, 2023
12	Dalam hal baris 11 diisi "Tidak", apakah tidak digunakannya data kerugian intern tersebut disebabkan ketidaksesuaian standar minimum untuk data kerugian? (Ya/Tidak) If line 11 is answered as 'No', is the internal loss data not use because of a discrepancy of the minimum standards for loss data? (Yes/No)	Ya		
13	*Threshold* yg digunakan dalam perhitungan modal untuk risiko operasional (dalam satuan rupiah penuh) Threshold used in calculating capital for operational risks (in Rupiah full amount)	300.000.000		
14	Keterangan Tambahan (jika ada) Other information (if any)	Optional		

Laporan Rincian Indikator Bisnis
Business Indicator Details Report

No	Indikator Bisnis (IB) dan Komponen IB Business Indicator (BI) and Component BI	31 Desember 2024 December 31, 2024	31 Desember 2023 December 31, 2023	31 Desember 2022 December 31, 2022
1	Komponen Bunga, Sewa, dan Dividen (KBSD) Interest, Rent and Dividend Components	369.128	-	-
1a	Pendapatan Bunga Interest Income	3.721.598	4.047.492	2.409.231
1b	Beban Bunga Interest Expense	871.037	944.568	713.152
1c	Aset Produktif Earning Assets	15.707.219	16.004.807	17.199.281
1d	Pendapatan Dividen Dividend Income	-	-	-
2	Komponen Jasa (KJ) Services Components	252.708	-	-
2a	Pendapatan Jasa dan Komisi Fees and Commission Income	100.772	143.658	281.988
2b	Beban Jasa dan Komisi Fees and Commission Expenses	65.798	447.813	238.293
2c	Pendapatan operasional lainnya Other Operating Income	-	-	-
2d	Beban operasional lainnya Other Operating Expenses	4.597	636	986
3	Komponen Keuangan (KK) Financial Components	2.076	-	-
3a	Laba Rugi Bersih Trading Book Net Profit Loss Trading Book	-	-	-
3b	Laba Rugi Bersih Banking Book Net Profit Loss Banking Book	(1.440)	384	(4.403)
4	Indikator Bisnis (IB) Business Indicator (BI)	623.912	-	-

dalam jutaan Rupiah | in million Rupiah

31 Desember 2022 December 31, 2022	31 Desember 2021 December 31, 2021	31 Desember 2020 December 31, 2020	31 Desember 2019 December 31, 2019	31 Desember 2018 December 31, 2018	31 Desember 2017 December 31, 2017	31 Desember 2016 December 31, 2016	Rata-rata 10 Tahun

No	Indikator Bisnis (IB) dan Komponen IB Business Indicator (BI) and Component BI	31 Desember 2024 December 31, 2024	31 Desember 2023 December 31, 2023	31 Desember 2022 December 31, 2022
5	Komponen Indikator Bisnis (KIB) Business Indicator Components (BIC)	74.869	-	-
	Pengungkapan Indikator Bisnis (IB) Business Indicator (BI) Disclosure	-	-	-
6a	IB total termasuk aktivitas yang didivestasi Total BI including divested activities	-	-	-
6b	Pengurangan IB dikarenakan pengecualian atas aktivitas yang didivestasi BI reduction due to the exclusion of divested activities	623.912	-	-
7	Keterangan Tambahan Additional information	Optional	-	-

Laporan Perhitungan ATMR untuk Risiko Operasional dengan Pendekatan Standar
RWA Calculation Report for Operational Risk Using the Standardized Approach

No	Rincian Details	31 Desember 2025 December 31, 2025
1	Komponen Indikator Bisnis (KIB) Business Indicator Components (BIC)	74.869
2	Faktor Pengali Kerugian Internal (FPKI) Internal Loss Multiplier Factor (ILM)	1,00
3	Modal Minimum Risiko Operasional (MMRO) Operational Risk Minimum Capital (ROC)	74.869,40
4	ATMR untuk Risiko Operasional RWA for Operational Risks	935.867

Laporan Perhitungan Kewajiban Pemenuhan Rasio Kecukupan Likuiditas (LCR)
Liquidity Coverage Ratio (LCR) Compliance Obligation Calculation Report

No	Komponen Components	Triwulan IV 2025 Quarter IV 2025 Nilai Outstanding kewajiban dan komitmen / nilai tagihan kontraktual Outstanding commitment and liabilities / contractual receivables
1	Jumlah data poin yang digunakan dalam perhitungan LCR Total data used in LCR calculation	
	HIGH QUALITY LIQUID ASSET (HQLA)	
2	Total High Quality Liquid Asset (HQLA)	
	ARUS KAS KELUAR BERSIH NET CASH OUTFLOW	
3	Simpanan nasabah perorangan dan Pendanaan yang berasal dari nasabah Usaha Mikro dan Usaha Kecil, terdiri dari: Retail deposits and deposits from Micro and Small Business customers, consist of:	7.958.525
	a. Simpanan/Pendanaan stabil Stable Deposit/Funding	303.197
	b. Simpanan/Pendanaan kurang stabil Less Stable Deposit/Funding	7.655.329
4	Pendanaan yang berasal dari nasabah korporasi, terdiri dari: Wholesale Funding, consist of:	1.217.059
	a. Simpanan operasional Operational deposit	305.862
	b. Simpanan non-operasional dan/atau kewajiban yang bersifat non-operasional yang berasal dari entitas lainnya Non operational deposit and/or Other Non Operational liabilities	911.197
	c. Surat berharga berupa surat utang yang diterbitkan Bank Marketable securities issued by bank (unsecured debt)	-
5	Penarikan Pendanaan dengan Agunan Secured Funding	-
6	Arus Kas Keluar Lainnya (Additional Requirement) Other Cash Outflow (Additional Requirement)	1.539.124
	a. Arus kas keluar lainnya terkait transaksi derivatif Other cash outflows related to derivative transactions	-
	b. Arus kas keluar lainnya terkait peningkatan kebutuhan likuiditas Other cash outflows related to additional liquidity requirement	
	c. Arus kas keluar lainnya terkait kehilangan Pendanaan Other cash outflows related to liquidation of funding	

dalam jutaan Rupiah | in million Rupiah

INDIVIDUAL		
	Triwulan III 2025 Quarter III 2025	
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 after haircut, outstanding commitment and liabilities times run off rate or contractual receivables times inflow rate	**Nilai Outstanding kewajiban dan komitmen / nilai tagihan kontraktual** Outstanding commitment and liabilities / contractual receivables	**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 after haircut, outstanding commitment and liabilities times run off rate or contractual receivables times inflow rate
92 Titik data posisi harian dan akhir bulan 92 daily and month-end position data points		92 Titik data posisi harian dan akhir bulan 92 daily and month-end position data points
10.143.540		9.243.377
780.693	7.948.539	779.182
15.160	313.434	15.672
765.533	7.635.105	763.511
794.062	1.129.728	738.233
57.825	284.703	54.101
736.237	845.025	684.132
-	-	-
-	-	-
1.403.299	1.681.366	1.407.361
-	-	-

No	Komponen Components	Triwulan IV 2025 Quarter IV 2025 Nilai Outstanding kewajiban dan komitmen / nilai tagihan kontraktual Outstanding commitment and liabilities / contractual receivables
	d. Arus kas keluar lainnya terkait dengan kewajiban komitmen dalam bentuk fasilitas kredit dan fasilitas likuiditas Other cash outflows related to disbursement of loan commitment and liquidity facilities	263.177
	e. Kewajiban kontraktual lainnya untuk menyediakan dana kepada: nasabah perorangan (nilai selisih lebih antara kewajiban kontraktual untuk menyalurkan dana dengan 50% total arus kas masuk) Other contractual obligations to provide funds to: Individual customers (excess of contractual obligations to disburse funds over 50% of the total cash inflows)	1.275.947
	f. Kewajiban kontijensi Pendanaan lainnya Other funding related contigencies liabilities	
	g. Arus kas keluar kontraktual lainnya Other contractual cash outflow	-
7	Total Arus Kas Keluar Total Cash Outflow	
Arus Kas Masuk Cash Inflow		
8	Pinjaman dengan Agunan Secured Lending	-
9	Tagihan berdasarkan Pihak Lawan Bills by Counterparty	2.357.129
10	Arus Kas Masuk Lainnya Other Cash Inflow	-
11	Total Arus Kas Masuk Total Cash Inflow	
12	Total HQLA	
13	Total Arus Kas Keluar Bersih Total Net Cash Out Flow	
14	LCR (%)	

[1] Keterangan: *Adjusted value* dihitung setelah pengenaan pengurangan nilai (*haircut*), tingkat penarikan (*run-off rate*), dan tingkat penerimaan (*inflow rate*) serta batas maksimum komponen HQLA, misalnya batas maksimum HQLA Level 2B dan HQLA Level 2 serta batas maksimum arus kas masuk yang dapat diperhitungkan dalam LCR.

[1] Note: Adjusted values are calculated after the imposition of a reduction in value (haircut), run-off rate, and inflow rate as well as the maximum limit for HQLA components, for example the maximum limit for HQLA Level 2B and HQLA Level 2 and the maximum limit of cash inflows can be taken into account in LCR.

dalam jutaan Rupiah | in million Rupiah

INDIVIDUAL		
	Triwulan III 2025 Quarter III 2025	
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 after haircut, outstanding commitment and liabilities times run off rate or contractual receivables times inflow rate	**Nilai Outstanding kewajiban dan komitmen / nilai tagihan kontraktual** Outstanding commitment and liabilities / contractual receivables	**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 after haircut, outstanding commitment and liabilities times run off rate or contractual receivables times inflow rate
127.352	436.590	162.586
1.275.947	1.244.775	1.244.775
-	-	-
2.978.054		2.924.776
-	-	-
1.328.516	2.456.035	1.418.474
-	-	-
1.328.516		1.418.474

TOTAL ADJUSTED VALUE [1]	TOTAL ADJUSTED VALUE [1]
10.143.540	9.243.377
1.649.537	1.506.302
614,93%	613,65%

Laporan Perhitungan Kewajiban Pemenuhan Rasio Pendanaan Stabil Bersih (NSFR)
Net Stable Funding Ratio (NSFR) Compliance Obligation Calculation Report

	Komponen ASF ASF Component	Posisi Tanggal Laporan (September 2025) Reporting Position (September 2025) Nilai Tercatat Berdasarkan Sisa Jangka Waktu (Dalam Jutaan Rupiah) Carrying Value Based on Residual Maturity (In Million Rupiah)			
		Tanpa Jangka Waktu[1] Non-specified Maturity[1]	**< 6 Bulan** < 6 Months	**> 6 Bulan - < 1 Tahun** > 6 Months - < 1 Year	**> 1 Tahun** > 1 Year
1	Modal: Capital:	4.008.061	-	-	-
2	Modal sesuai POJK KPMM Regulatory Capital as per POJK KPMM	4.008.061	-	-	-
3	Instrumen modal lainnya Other capital instruments	-	-	-	-
4	Simpanan yang berasal dari nasabah perorangan dan pendanaan yang berasal dari nasabah usaha mikro dan usaha kecil: Retail deposits and deposits from micro and small business customers:	3.283.365	7.689.380	912.710	-
5	Simpanan dan pendanaan stabil Stable Deposits	300.078	11.919	124	-
6	Simpanan dan pendanaan kurang stabil Less Stable Deposits	2.983.287	7.677.462	912.586	-
7	Pendanaan yang berasal dari nasabah korporasi: Wholesale Funding:	588.480	1.207.979	9.020	-
8	Simpanan operasional Operational deposits	-	-	-	-
9	Pendanaan lainnya yang berasal dari nasabah korporasi Other wholesale funding	588.480	1.207.979	9.020	-
10	Liabilitas yang memiliki pasangan aset yang saling bergantung Liabilities with matching interdependent assets	-	-	-	-
11	Liabilitas dan ekuitas lainnya: Other liabilities and equity:	588.983	-	-	-
12	NSFR liabilitas derivatif NSFR derivative liabilities		-		
13	ekuitas dan liabilitas lainnya yang tidak masuk dalam kategori diatas All other liabilities and equity not included in the above categories	588.983	-	-	-
14	Total ASF				
15	Total HQLA dalam rangka perhitungan NSFR Total NSFR HQLA				

	Posisi Tanggal Laporan Desember 2025 Reporting Position (December 2025)				
	Nilai Tercatat Berdasarkan Sisa Jangka Waktu (Dalam Jutaan Rupiah) Carrying Value Based on Residual Maturity (In Million Rupiah)				
Total Nilai Tertimbang Weighted Value	**Tanpa Jangka Waktu**[1] Non-specified Maturity[1]	**< 6 Bulan** < 6 Months	**> 6 Bulan - < 1 Tahun** > 6 Months - < 1 Year	**> 1 Tahun** > 1 Year	**Total Nilai Tertimbang** Weighted Value
4.008.061	4.084.422	-	-	-	4.084.422
4.008.061	4.084.422	-	-	-	4.084.422
-	-	-	-	-	-
10.712.516	3.513.355	7.669.865	806.212	-	10.806.850
296.514	327.030	189	1,25	-	310.859
10.416.001	3.186.325	7.669.676	806.211	-	10.495.991
253.023	588.480	1.207.979	9.020	-	336.713
-	-	-	-	-	-
253.023	657.224	1.429.193	22.184	-	336.713
-	-	-	-	-	-
-	637.980	-	-	-	-
		-			
-	637.980	11.698	-	-	-
14.973.599					15.227.986
294.364	2.517.588	4.578.548	1.117.054	1.934.592	348.939

	Komponen ASF ASF Component	Posisi Tanggal Laporan (September 2025) Reporting Position (September 2025) Nilai Tercatat Berdasarkan Sisa Jangka Waktu (Dalam Jutaan Rupiah) Carrying Value Based on Residual Maturity (In Million Rupiah)			
		Tanpa Jangka Waktu[1] Non-specified Maturity[1]	**< 6 Bulan** < 6 Months	**> 6 Bulan - < 1 Tahun** > 6 Months - < 1 Year	**> 1 Tahun** > 1 Year
16	Simpanan pada lembaga keuangan lain untuk tujuan operasional Deposits held at other financial institutions for operational purposes	3.058	-	-	-
17	Pinjaman dengan kategori Lancar dan Dalam Perhatian Khusus (performing): Performing loans:	-	5.197.815	1.479.371	903.280
18	Kepada lembaga keuangan yang dijamin dengan HQLA Level 1 To financial institutions secured by Level 1 HQLA	-	-	-	-
19	Kepada lembaga keuangan yang dijamin bukan dengan HQLA Level 1 dan pinjaman kepada lembaga keuangan tanpa jaminan To financial institutions secured by nonLevel 1 HQLA and unsecured performing loans to financial institutions	-	467.024	42.751	75.243
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 diantaranya: To non- financial corporate clients, retail and small business customers, government of Indonesia, other sovereigns, Bank Indonesia, other central banks and pubic service entities, of which	-	4.730.791	1.243.593	651.737
21	Memenuhi kualifikasi untuk mendapat bobot risiko 35% atau kurang, sesuai SE OJK ATMR untuk Risiko Kredit Meet a risk weight of less than or equal to 35% under SE OJK ATMR for credit risk	-	-	-	1.674
22	Kredit beragun rumah tinggal yang tidak sedang dijaminkan, yang diantaranya: Unpledged residential mortgages, of which:	-	-	-	-
23	Memenuhi kualifikasi untuk mendapat bobot risiko 35% atau kurang, sesuai SE OJK ATMR untuk Risiko Kredit Meet a risk weight of less than or equal to 35% under SE OJK ATMR for credit risk	-	-	-	-

	Posisi Tanggal Laporan Desember 2025 Reporting Position (December 2025)					
	Nilai Tercatat Berdasarkan Sisa Jangka Waktu (Dalam Jutaan Rupiah) Carrying Value Based on Residual Maturity (In Million Rupiah)					
Total Nilai Tertimbang Weighted Value	**Tanpa Jangka Waktu**[1] Non-specified Maturity[1]	**< 6 Bulan** < 6 Months	**> 6 Bulan - < 1 Tahun** > 6 Months - < 1 Year	**> 1 Tahun** > 1 Year	**Total Nilai Tertimbang** Weighted Value
1.529	2.604	-	-	-	1.302
3.953.874	-	5.275.578	1.720.895	761.981	4.009.396
-	-	-	-	-	-
166.673	-	659.821	51.516	45.460	170.191
3.541.169	-	4.559.732	1.389.734	464.302	3.455.966
1.088	-	-	-	1.565	1.017
-	-	-	-	-	-
-	-	-	-	-	-

	Komponen ASF ASF Component	Posisi Tanggal Laporan (September 2025) Reporting Position (September 2025) Nilai Tercatat Berdasarkan Sisa Jangka Waktu (Dalam Jutaan Rupiah) Carrying Value Based on Residual Maturity (In Million Rupiah)			
		Tanpa Jangka Waktu[1] Non-specified Maturity[1]	**< 6 Bulan** < 6 Months	**> 6 Bulan - < 1 Tahun** > 6 Months - < 1 Year	**> 1 Tahun** > 1 Year
24	Surat Berharga dengan kategori Lancar dan Kurang Lancar (*performing*) yang tidak sedang dijaminkan, tidak gagal bayar , dan tidak masuk sebagai HQLA, termasuk saham yang diperdagangkan di bursa Unencumbered and performing securities (categorized as current and less current), not in default and not classified as HQLA, including exchange-traded equities	-	-	193.026	174.626
25	Aset yang memiliki pasangan liabilitas yang saling bergantung Assets with matching interdependent liabilities	-	-	-	-
26	Aset lainnya: Other assets:	-	9.281	247	1.109.364
27	Komoditas fisik yang yang diperdagangkan, termasuk emas Physical traded commodities, including gold	-	-	-	-
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 posted as initial margin for derivative contracts or contributions to default funds of central counterparty (CCPs)	-	-	-	-
29	NSFR aset derivatif NSFR derivative assets	-	-	-	-
30	NSFR liabilitas derivatif sebelum dikurangi dengan variation margin Derivative liabilities under NSFR before deduction of variation margin	-	-	-	-
31	Seluruh aset lainnya yang tidak masuk dalam kategori diatas All other assets not included in the above categories	-	9.281	247	1.109.364
32	Rekening Administratif Off-balance sheet items		1.225.259		
33	Total RSF				
34	Rasio Pendanaan Stabil Bersih (%) Net Stable Funding Ratio (%)				

[1] Komponen yang dilaporkan dalam kategori tanpa jangka waktu adalah komponen yang tidak memiliki jangka waktu kontraktual, antara lain: instrumen modal yang bersifat permanen (perpetual), short positions, open maturity positions, giro, ekuitas yang tidak masuk dalam kategori HQLA dan komoditas

[1] Components reported in the no term category are components that do not have a contractual term, including: perpetual capital instruments, short positions, open maturity positions, giro, ekuitas yang tidak masuk dalam kategori HQLA dan komoditas

		Posisi Tanggal Laporan Desember 2025 Reporting Position (December 2025)				
		Nilai Tercatat Berdasarkan Sisa Jangka Waktu (Dalam Jutaan Rupiah) Carrying Value Based on Residual Maturity (In Million Rupiah)				
	Total Nilai Tertimbang Weighted Value	**Tanpa Jangka Waktu**[1] Non-specified Maturity[1]	**< 6 Bulan** < 6 Months	**> 6 Bulan - < 1 Tahun** > 6 Months - < 1 Year	**> 1 Tahun** > 1 Year	**Total Nilai Tertimbang** Weighted Value
	244.945	-	56.025	279.645	252.219	382.222
	-	-	-	-	-	-
	1.118.892	-	11.233	21.658	1.073.480	1.106.371
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	-	-	-	-	-	-
	1.118.892	-	11.233	21.658	1.073.480	1.106.371
	-		1.290.280			-
	5.368.660					5.466.009
	278,91%					278,59%



Tata Kelola Perusahaan

Corporate Governance


Media Monitoring
Monthly Report

Komitmen Terhadap Penerapan Tata Kelola Perusahaan Yang Baik

Commitment to the Implementation of Good Corporate Governance

PT Bank Neo Commerce Tbk ("BNC" atau "Perseroan") menjadikan penerapan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance/GCG*) sebagai landasan strategis dalam menciptakan nilai berkelanjutan bagi pemegang saham, masyarakat, serta seluruh pemangku kepentingan. Komitmen tersebut dilaksanakan secara konsisten guna mendukung keberlanjutan usaha Perseroan, baik dalam perspektif jangka pendek maupun jangka panjang.

Dalam rangka memastikan efektivitas penerapan GCG, Perseroan secara berkelanjutan melakukan penguatan dan penyempurnaan kebijakan, struktur, serta proses tata kelola dengan mengacu pada ketentuan peraturan perundang-undangan yang berlaku, pedoman regulator, serta praktik terbaik di tingkat nasional maupun internasional. Upaya tersebut ditujukan untuk memastikan seluruh kegiatan usaha dilaksanakan secara transparan, akuntabel, bertanggung jawab, dan selaras dengan prinsip kehati-hatian.

Sebagai entitas yang beroperasi dalam industri perbankan yang diatur secara ketat, BNC juga berkomitmen untuk menginternalisasikan prinsip-prinsip GCG ke dalam setiap aktivitas operasional dan pengambilan keputusan. Perseroan meyakini bahwa penerapan tata kelola yang konsisten dan berkesinambungan merupakan prasyaratan utama bagi terwujudnya kegiatan usaha yang sehat, patuh terhadap regulasi, serta menjunjung tinggi standar etika. Pada akhirnya, penguatan praktik GCG diharapkan dapat mendorong peningkatan kinerja Perseroan sekaligus memperkokoh kepercayaan para pemangku kepentingan.

PT Bank Neo Commerce Tbk ("BNC" or "the Company") considers the implementation of Good Corporate Governance (GCG) to be a strategic foundation in creating sustainable value for shareholders, the community, and all stakeholders. This commitment is consistently implemented to support the sustainability of the Company's business, both from a short-term and long-term perspective.

To ensure the effectiveness of GCG implementation, the Company continuously strengthens and refines its governance policies, structures, and processes in accordance with applicable laws and regulations, regulatory guidelines, including national and international best practices. These efforts aim to ensure that all business activities are conducted transparently, accountably, responsibly, and in line with the principle of prudence.

As an entity operating in the highly regulated banking industry, BNC is also committed to incorporating GCG principles into every operational activity and decision-making process. The Company believes that consistent and sustainable implementation of corporate governance is a key prerequisite in achieving sound business operations that comply with regulations and uphold ethical standards. Ultimately, the strengthening of GCG practices is expected to drive improvements in the Company's performance while reinforcing stakeholder trust.

Landasan Hukum Kebijakan Tata Kelola
Legal Basis of Governance Policies

Dalam menerapkan prinsip-prinsip GCG, Perseroan berpedoman pada berbagai ketentuan hukum dan regulasi yang berlaku di Indonesia, antara lain:

1. Undang-undang Republik Indonesia Nomor 10 tahun 1998 tentang Perubahan atas Undang-undang No 7 tahun 1992 tentang Perbankan.
2. Undang-undang Republik Indonesia Nomor 40 tahun 2007 tentang Perseroan Terbatas.
3. Peraturan Pemerintah Republik Indonesia Nomor 29 Tahun 1999 tentang Pembelian Saham Bank Umum.
4. Peraturan Otoritas Jasa Keuangan Nomor 35/POJK.04/2014 tentang Sekretaris Perusahaan Emiten atau Perusahaan Publik.
5. Peraturan Otoritas Jasa Keuangan Nomor 34/POJK.04/2014 tentang Komite Nominasi dan Remunerasi Emiten atau Perusahaan Publik.
6. Peraturan Otoritas Jasa Keuangan Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.
7. Peraturan Otoritas Jasa Keuangan Nomor 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.
8. Peraturan Otoritas Jasa Keuangan Nomor 45/POJK.03/2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum.
9. Peraturan Otoritas Jasa Keuangan Nomor 8/POJK.04/2015 tentang Situs Web Emiten atau Perusahaan Publik.
10. Peraturan Otoritas Jasa Keuangan Nomor 31/POJK.04/2015 tentang Keterbukaan atas Informasi atau Fakta Material oleh Emiten atau Perusahaan Publik.
11. Peraturan Otoritas Jasa Keuangan Nomor 56/POJK.04/2015 tentang Pembentukan dan Pedoman Penyusunan Piagam Unit Audit Internal.
12. Peraturan Otoritas Jasa Keuangan Nomor 56/POJK.03/2016 tentang Kepemilikan Saham Bank Umum.
13. Peraturan Otoritas Jasa Keuangan Nomor 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan Bagi Pihak Utama Lembaga Jasa Keuangan.
14. Peraturan Otoritas Jasa Keuangan Nomor 18/POJK.03/2016 tentang Penerapan Manajemen Risiko Bagi Bank Umum.
15. Peraturan Otoritas Jasa Keuangan Nomor 5/POJK.03/2016 tentang Rencana Bisnis Bank.

In applying GCG principles, the Company refers to various applicable laws and regulations in Indonesia, including:

1. Indonesian Law No. 10 of 1998 concerning Amendments to Law No. 7 of 1992 regarding Banking.
2. Indonesian Law No. 40 of 2007 concerning Limited Liability Companies.
3. Government Regulation of the Republic of Indonesia No. 29 of 1999 concerning the Purchase of Commercial Bank Shares.
4. Financial Services Authority Regulation No. 35/POJK.04/2014 concerning Corporate Secretaries of Issuers or Public Companies.
5. Financial Services Authority Regulation No. 34/POJK.04/2014 concerning Nomination and Remuneration Committees of Issuers or Public Companies.
6. Financial Services Authority Regulation No. 33/POJK.04/2014 concerning Boards of Directors and Boards of Commissioners of Issuers or Public Companies.
7. Financial Services Authority Regulation No. 55/POJK.04/2015 concerning the Establishment and Implementation Guidelines of Audit Committees.
8. Financial Services Authority Regulation No. 45/POJK.03/2015 concerning Governance Implementation in Providing Remuneration for Commercial Banks.
9. Financial Services Authority Regulation No. 8/POJK.04/2015 concerning Websites of Issuers or Public Companies.
10. Financial Services Authority Regulation No. 31/POJK.04/2015 concerning Disclosure of Information or Material Facts by Issuers or Public Companies.
11. Financial Services Authority Regulation No. 56/POJK.04/2015 concerning the Establishment and Guidelines for the Preparatio of Internal Audit Unit Charter.
12. Financial Services Authority Regulation No. 56/POJK.03/2016 concerning Ownership of Commercial Bank Shares.
13. Financial Services Authority Regulation No. 27/POJK.03/2016 concerning Fit and Proper Assessment for Key Persons in Financial Services Institutions.
14. Financial Services Authority Regulation No. 18/POJK.03/2016 concerning Risk Management Implementation for Commercial Banks.
15. Financial Services Authority Regulation No. 5/POJK.03/2016 concerning Bank Business Plans.

16. Peraturan Otoritas Jasa Keuangan Nomor 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.
17. Peraturan Otoritas Jasa Keuangan Nomor 32/POJK.03/2018 tentang Batas Maksimum Pemberian Kredit Dan Penyediaan Dana Besar Bagi Bank Umum.
18. Peraturan Otoritas Jasa Keuangan Nomor 38/POJK.03/2019 tentang Perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 32/POJK.03/2018 tentang Batas Maksimum Pemberian Kredit dan Penyediaan Dana Besar Bagi Bank Umum.
19. Peraturan Otoritas Jasa Keuangan No. 1/POJK.03/2019 tentang Penerapan Fungsi Audit Intern pada Bank Umum.
20. Peraturan Otoritas Jasa Keuangan Nomor 23/POJK.01/2019 tentang perubahan atas Peraturan Otoritas Jasa Keuangan Nomor 12/POJK.01/2017 tentang Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme di Sektor Jasa Keuangan.
21. Peraturan Otoritas Jasa Keuangan Nomor 15/POJK.04/2020 tentang Rencana dan Penyelenggaraan Rapat Umum Pemegang Saham Perusahaan Terbuka.
22. Peraturan Otoritas Jasa Keuangan Nomor 27/POJK.04/2020 tentang Saham Bonus.
23. Peraturan Otoritas Jasa Keuangan Nomor 12/POJK.03/2021 tentang Bank Umum.
24. Peraturan Otoritas Jasa Keuangan Nomor 13/POJK.03/2021 tentang Penyelenggaraan Produk Bank Umum.
25. Peraturan Otoritas Jasa Keuangan Nomor 17 Tahun 2023 tentang Penerapan Tata Kelola Bagi Bank Umum.
26. Peraturan Otoritas Jasa Keuangan Republik Indonesia Nomor 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik Dan Kantor Akuntan Publik Dalam Kegiatan Jasa Keuangan.
27. Peraturan Otoritas Jasa Keuangan Nomor 8 Tahun 2023 tentang Penerapan Program Anti Pencucian Uang, Pencegahan Pendanaan Terorisme dan Pencegahan Pendanaan Proliferasi Senjata Pemusnah Massal Di Sektor Jasa Keuangan.
28. Peraturan Otoritas Jasa Keuangan Nomor 4 Tahun 2024 Laporan Kepemilikan atau Setiap Perubahan Kepemilikan Saham Perusahaan Terbuka dan Aktivitas Menjaminkan Saham Perusahaan Terbuka.
29. Peraturan Otoritas Jasa Keuangan Nomor 45 Tahun 2024 tentang Pengembangan Dan Penguatan Emiten Dan Perusahaan Publik.
30. Peraturan Otoritas Jasa Keuangan Nomor 14 Tahun 2025 tentang Pelaksanaan Rapat Umum Pemegang Saham, Rapat Umum Pemegang Obligasi, dan Rapat Umum Pemegang Sukuk Secara Elektronik.

16. Financial Services Authority Regulation No. 46/POJK.03/2017 concerning Implementation of Compliance Function for Commercial Banks.
17. Financial Services Authority Regulation No. 32/POJK.03/2018 concerning Legal Lending Limits and Provision of Large Funds for Commercial Banks.
18. Financial Services Authority Regulation No. 38/POJK.03/2019 concerning Amendments to OJK Regulation No. 32/POJK.03/2018 regarding Legal Lending Limits and Provision of Large Funds for Commercial Banks.
19. Financial Services Authority Regulation No. 1/POJK.03/2019 concerning Implementation of Internal Audit Functions in Commercial Banks.
20. Financial Services Authority Regulation No. 23/POJK.01/2019 concerning amendments to OJK Regulation Number 12/POJK.01/2017 regarding the Implementation of Anti-Bribery and Counter-Terrorism Financing Program in Financial Services Sector.
21. Financial Services Authority Regulation No. 15/POJK.04/2020 concerning Planning and Implementation of General Meetings of Shareholders of Public Companies.
22. Financial Services Authority Regulation No. 27/POJK.04/2020 concerning Bonus Shares.
23. Financial Services Authority Regulation No. 12/POJK.03/2021 concerning Commercial Banks.
24. Financial Services Authority Regulation No. 13/POJK.03/2021 concerning the Implementation of Commercial Bank Products.
25. Financial Services Authority Regulation No. 17 of 2023 concerning Implementation of Governance for Commercial Banks.
26. Financial Services Authority Regulation No. 9 of 2023 concerning the Use of Public Accountants and Public Accounting Firms in Financial Services Activities.
27. Financial Services Authority Regulation No. 8 of 2023 concerning the Implementation of Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing of Mass Destruction Weapons in the Financial Services Sector.
28. Financial Services Authority Regulation No. 4 of 2024 concerning Reports of Ownership or Any Changes in Share Ownership of Public Companies and Activities Involving the Pledging of Shares of Public Companies.
29. Financial Services Authority Regulation No. 45 of 2024 concerning the Development and Strengthening of Issuers and Public Companies.
30. Financial Services Authority Regulation No. 14 of 2025 concerning the Conduct of General Meetings of Shareholders, General Meetings of Bondholders, and General Meetings of Sukuk Holders Electronically.

31. Peraturan Otoritas Jasa Keuangan Nomor 18 Tahun 2025 tentang Transparansi dan Publikasi Laporan Bank.
32. Surat Edaran Otoritas Jasa Keuangan Nomor 32/SEOJK.04/2015 tentang Tata Kelola Perusahaan Terbuka.
33. Surat Edaran Otoritas Jasa Keuangan Nomor 40/SEOJK.03/2016 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum.
34. Surat Edaran Otoritas Jasa Keuangan Nomor 14/SEOJK.03/2025 tentang Penerapan Tata Kelola Bagi Bank Umum.
35. Surat Edaran Otoritas Jasa Keuangan Nomor 35/SEOJK.03/2017 tentang Pedoman Standar Sistem Pengendalian *Intern* Bagi Bank Umum.
36. Surat Edaran Otoritas Jasa Keuangan Nomor 12/SEOJK.03/2017 tentang Kepemilikan Saham Bank Umum.
37. Surat Edaran Otoritas Jasa Keuangan Nomor 32/SEOJK.03/2017 tentang Penerapan Program Anti Pencucian Uang dan Pencegahan Pendanaan Terorisme di Sektor Perbankan.
38. Surat Edaran Otoritas Jasa Keuangan Nomor 12/SEOJK.03/2021 tentang Rencana Bisnis Bank.

31. Financial Services Authority Regulation No. 18 of 2025 concerning Transparency and Publication of Bank Reports.
32. Financial Services Authority Circular Letter No. 32/SEOJK.04/2015 concerning Governance of Public Companies.
33. Financial Services Authority Circular Letter No. 40/SEOJK.03/2016 concerning Governance Implementation in Providing Remuneration for Commercial Banks.
34. Financial Services Authority Circular Letter No. 14/SEOJK.03/2025 concerning Governance Implementation for Commercial Banks.
35. Financial Services Authority Circular Letter No. 35/SEOJK.03/2017 concerning Internal Control System Standard Guidelines for Commercial Banks.
36. Financial Services Authority Circular Letter No. 12/SEOJK.03/2017 concerning Ownership of Commercial Bank Shares.
37. Financial Services Authority Circular Letter No. 32/SEOJK.03/2017 concerning the Implementation of Anti-Money Laundering and Counter-Terrorism Financing Programs in the Banking Sector.
38. Financial Services Authority Circular Letter No. 12/SEOJK.03/2021 concerning Bank Business Plans.

Prinsip Tata Kelola Perusahaan
Corporate Governance Principles

Bagi Perseroan, penerapan GCG tidak semata-mata dilakukan untuk memenuhi kewajiban regulasi. Lebih dari itu, GCG diposisikan sebagai nilai dasar yang menjiwai seluruh aktivitas operasional sehari-hari. Perseroan meyakini bahwa tata kelola yang kuat merupakan faktor kunci dalam meningkatkan kinerja, menjaga keberlanjutan usaha, serta memperkuat daya saing di industri perbankan.

Oleh karena itu, BNC secara berkelanjutan melakukan penguatan kualitas penerapan GCG dengan mengacu pada praktik terbaik (*best practices*), khususnya yang relevan dengan sektor perbankan. Sejalan dengan komitmen tersebut, sejak tahun 2023 Perseroan telah mengadopsi pilar-pilar governansi sebagaimana tercantum dalam *Pedoman Umum Governansi Korporat Indonesia* (PUGKI) yang diterbitkan oleh Komite Nasional Kebijakan Governance (KNKG) pada tahun 2021, yaitu:

For the Company, the implementation of GCG is more than just fulfilling regulatory obligations. GCG is positioned as a core value that underpins all daily operational activities. The Company believes that strong governance is a key factor in improving performance, ensuring business sustainability, and strengthening competitiveness in the banking industry.

Therefore, BNC continuously strengthens the quality of its GCG implementation by referring to best practices, particularly those relevant to the banking sector. In line with this commitment, the Company has adopted the governance pillars as outlined in the General Guidelines for Indonesian Corporate Governance (PUGKI) published by the National Committee on Governance Policy (KNKG) in 2021, as follows:

Pilar Tata Kelola Governance Pillar	Definisi Definition
Perilaku Beretika Ethical Conduct	Dalam melaksanakan kegiatannya, Perseroan senantiasa mengedepankan kejujuran, memperlakukan semua pihak dengan hormat *(respect),* memenuhi komitmen, membangun serta menjaga nilai-nilai moral dan kepercayaan secara konsisten. Perseroan memperhatikan kepentingan pemegang saham dan pemangku kepentingan lainnya berdasarkan asas kewajaran dan kesetaraan *(fairness)* dan dikelola secara independen sehingga masing-masing organ perusahaan tidak saling mendominasi dan tidak dapat diintervensi oleh pihak lain. In conducting its activities, the Company consistently upholds honesty, treats all parties with respect, honors its commitments, and continuously builds and maintains moral values and trust. The Company prioritizes the interests of shareholders and other stakeholders based on the principles of fairness and equity, and is managed independently so that no corporate organ dominates or is subject to interference from others.
Akuntabilitas Accountability	Perseroan dapat mempertanggungjawabkan kinerjanya secara transparan dan wajar. Untuk itu Perseroan harus dikelola secara benar, terukur dan sesuai dengan kepentingan Perseroan dengan tetap memperhitungkan kepentingan pemegang saham dan pemangku kepentingan. Akuntabilitas merupakan prasyarat yang diperlukan untuk mencapai kinerja yang berkelanjutan. The Company is able to account for its performance in a transparent and fair manner. To achieve this, the Company must be managed properly, measurably, and in alignment with the Company's interests while also considering those of shareholders and stakeholders. Accountability is a critical prerequisite for achieving sustainable performance.
Transparansi Transparency	Untuk menjaga objektivitas dalam menjalankan bisnis, korporasi menyediakan informasi yang material dan relevan dengan cara yang mudah diakses dan dipahami oleh pemangku kepentingan. Perseroan mengambil inisiatif untuk mengungkapkan tidak hanya masalah yang disyaratkan oleh peraturan perundang-undangan, tetapi juga hal yang penting untuk pengambilan keputusan oleh pemegang saham, kreditur dan pemangku kepentingan lainnya To maintain objectivity in business operations, the Company provides material and relevant information that is accessible and understandable to stakeholders. The Company takes the initiative to disclose not only matters required by laws and regulations, but also other important information needed for decision-making by shareholders, creditors, and stakeholders.
Keberlanjutan Sustainability	Perseroan 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 Company complies with all applicable laws and is committed to fulfilling its responsibilities to society and the environment. This commitment supports sustainable development through collaboration with relevant stakeholders to improve livelihoods in a manner aligned with business interests and sustainable development goals.

Di samping implementasi empat pilar tata kelola, Perseroan secara konsisten mengadopsi delapan prinsip *Good Corporate Governance* (GCG) yang menjadi fondasi dalam menjamin pemenuhan hak-hak pemegang saham dan pemangku kepentingan. Prinsip-prinsip ini juga mengatur kerangka dasar pengelolaan serta mekanisme pengawasan terhadap jalannya korporasi di Indonesia, termasuk di dalamnya penerapan etika bisnis, pengelolaan risiko, dan keterbukaan informasi. Untuk memastikan penerapan yang efektif dan terstruktur, kedelapan prinsip GCG tersebut dikelompokkan ke dalam tiga kategori utama prinsip tata kelola.

Besides implementing the four pillars of corporate governance, the Company consistently adheres to the eight principles of Good Corporate Governance (GCG), which serve as a foundation in ensuring the fulfillment of the rights of shareholders and stakeholders. These principles also govern the basic framework for management and the oversight mechanisms for corporate operations in Indonesia, including the application of business ethics, risk management, and information disclosure. To ensure effective and structured implementation, these eight GCG principles are classified into three main categories of governance principles.

Prinsip Principle	Definisi Definition	Penjelasan Description
Prinsip 1: Peran dan Tanggung Jawab Direksi dan Dewan Komisaris **Principle 1:** Role and Responsibilities of the Board of Directors and Board of Commissioners	Direksi dan Dewan Komisaris menjalankan peran dan tanggung jawabnya secara independen untuk menciptakan nilai yang berkelanjutan untuk kepentingan terbaik jangka panjang Perseroan dan pemegang saham, dengan mempertimbangkan kepentingan para pemangku kepentingan. The Board of Directors and the Board of Commissioners carry out their respective roles and responsibilities independently to create sustainable value in the best long-term interests of the Company and its shareholders, while considering the interests of other stakeholders.	Prinsip 1 berkaitan dengan peran dan tanggung jawab Direksi dalam melakukan pengelolaan Perseroan serta peran dan tanggung jawab Dewan Komisaris dalam melakukan pengawasan atas pengelolaan Perseroan oleh Direksi. Di samping itu, Prinsip ini mengatur penilaian kinerja Direksi dan Dewan Komisaris dan anggotanya masing-masing, penanganan benturan kepentingan yang terjadi pada anggota Direksi dan anggota Dewan Komisaris, serta peningkatan kompetensi anggota Direksi dan anggota Dewan Komisaris. This principle relates to the roles and responsibilities of the Board of Directors in managing the Company, and the roles and responsibilities of the Board of Commissioners in supervising such management. It also covers the performance evaluation of each member of the Board of Directors and Board of Commissioners, handling conflicts of interest involving members of both boards, and enhancing their competencies.
Prinsip 2: Komposisi dan Remunerasi Direksi dan Dewan Komisaris **Principle 2:** Composition and Remuneration of the Board of Directors and Board of Commissioners	Anggota Direksi dan anggota Dewan Komisaris dipilih dan ditetapkan sedemikian rupa sehingga komposisi Direksi sebagai organ pengelolaan dan komposisi Dewan Komisaris sebagai organ pengawasan adalah beragam dan masing-masing terdiri dari para Direktur dan Komisaris yang memiliki komitmen, pengetahuan, kemampuan, pengalaman, dan keahlian yang dibutuhkan untuk memenuhi secara tepat peran pengelolaan Direksi dan peran pengawasan Dewan Komisaris. Members of the Board of Director and Board of Commissioners are selected and appointed so that the composition of each governing body is diverse and consists of individuals with the commitment, knowledge, skills, experience, and expertise needed to fulfill their respective management and supervisory roles effectively	Prinsip 2 mengharuskan pemilihan dan penetapan anggota Direksi dan anggota Dewan Komisaris dilakukan sedemikian rupa sehingga Direksi dan Dewan Komisaris masing-masing sebaga organ pengelolaan dan pengawasan memiliki komposisi anggota dengan pengetahuan, kemampuan, dan keahlian yang dibutuhkan sesuai dengan perannya masing-masing. Di samping itu, Prinsip ini menekankan pentingnya kebijakan remunerasi untuk mendorong anggota Direksi dan anggota Dewan Komisaris mengutamakan kepentingan jangka panjang Perseroan berdasarkan prinsip keberlanjutan, serta mengharuskan pengungkapan kebijakan dan informasi remunerasi yang diterima oleh Direksi dan Dewan Komisaris secara transparan dan akuntabel. This principle requires that the selection and appointment of board members ensure an appropriate mix of skills and expertise aligned with each board's role. It also emphasizes the importance of remuneration policies that encourage long-term Company interests based on sustainability principles, with transparent and accountable disclosure of the remuneration received by both boards.

Prinsip Principle	Definisi Definition	Penjelasan Description
Prinsip 3: Hubungan Kerja antara Direksi dan Dewan Komisaris **Principle 3:** Working Relationship between the Board of Directors and the Board of Commissioners	Direksi dan Dewan Komisaris memiliki hubungan kerja yang erat, terbuka, konstruktif, profesional, dan saling percaya untuk kepentingan terbaik korporasi. The Board of Directors and the Board of Commissioners maintain a close, open, constructive, professional, and mutually trusting working relationship for the best interest of the Company	Prinsip 3 menekankan pentingnya hubungan kerja yang erat, terbuka, konstruktif, profesional, saling percaya antara Direksi dan Dewan Komisaris dalam mencapai kepentingan terbaik Perseroan. Prinsip 3 ini juga mengatur perlunya Dewan Komisaris mengakses informasi yang lengkap serta pentingnya anggota Direksi dan Dewan Komisaris memahami implikasi struktur kepemilikan korporasi terhadap pelaksanaan perannya. This principle stresses the importance of professional and cooperative relationships between the two boards. It also includes the need for the Board of Commissioners to have access to complete information and for both boards to understand the implications of the Company's ownership structure on the execution of their respective roles
Prinsip 4: Perilaku Etis **Principle 4:** Ethical Conduct	Perseroan memiliki komitmen untuk bertindak secara etis dan bertanggung jawab, menegakkan nilai-nilai dan budaya organisasi. The Company is committed to acting ethically and responsibly, upholding organizational values and culture.	Prinsip 4 mengharuskan Perseroan membuat pernyataan secara berkala tentang komitmen Perseroan tidak hanya mematuhi peraturan perundangundangan yang berlaku, namun juga komitmen untuk bertindak etis dan bertanggung jawab. This principle requires the Company to regularly declare its commitment not only to comply with applicable laws and regulations, but also to act in an ethical and responsible manner.
Prinsip 5: Manajemen Risiko, Pengendalian Internal dan Kepatuhan **Principle5:** Risk Management, Internal Control, and Compliance	Perseroan menjalankan praktik tata kelola perusahaan yang terintegrasi dengan penerapan sistem pengendalian internal dan manajemen risiko, serta sistem manajemen kepatuhan yang efektif dalam rangka mendukung pencapaian sasaran, visi, misi, tujuan, maupun target kinerja korporat dalam menjalankan bisnis secara berintegritas. The Company integrates governance practices with an effective internal control system, risk management, and compliance management system to support the achievement of corporate goals, vision, mission, and performance targets with integrity	Prinsip 5 mengharuskan Direksi untuk mengimplementasikan tata kelola, sistem pengendalian internal dan manajemen risiko, dan sistem manajemen kepatuhan secara terintegrasi sebagai bagian dari strategi, perangkat manajemen, dan praktik yang dijalankan Perseroan dalam berbisnis secara bertanggung jawab *(responsible business)* sebagai warga korporat yang baik *(good corporate citizen).* Dewan Komisaris memantau dan menyampaikan masukan terhadap efektivitas penerapan tata kelola, sistem pengendalian internal dan manajemen risiko, dan sistem manajemen kepatuhan Perseroan yang dilaksanakan secara terintegrasi oleh Direksi. This principle requires the Board of Directors to implement governance, internal controls, risk management, and compliance systems as part of the Company's strategy and business practices. The Board of Commissioners monitors and provides feedback on the effectiveness of these systems

Prinsip Principle	Definisi Definition	Penjelasan Description
Prinsip 6: Pengungkapan dan Transparansi **Principle 6:** Principle Disclosure and Transparency	Perseroan membuat pengungkapan yang akurat dan tepat waktu mengenai semua hal yang material tentang Perseroan. The Company makes accurate and timely disclosures of all material matters	Prinsip 6 mengharuskan Perseroan untuk memiliki kerangka tata kelola yang mampu memberikan keyakinan yang dapat menghasilkan pengungkapan yang akurat dan tepat waktu mengenai semua hal yang material tentang Perseroan, yang meliputi kondisi dan kinerja keuangan, kepemilikan atas korporasi, dan tata kelola perusahaan yang baik. This principle mandates that the Company establish a governance framework that ensures accurate and timely disclosure of material matters, including financial performance, ownership structure, and governance practices
Prinsip 7: Hak-hak Pemegang Saham **Principle 7:** Shareholder' Rights	Perseroan melindungi dan memfasilitasi pelaksanaan hak pemegang saham dan memastikan perlakuan yang adil terhadap pemegang saham, termasuk pemegang saham minoritas. Semua pemegang saham memiliki kesempatan untuk mendapatkan ganti rugi yang efektif atas pelanggaran hakhak mereka. The Company protects and facilitates shareholders' rights and ensures fair treatment for all shareholders, including minority shareholders. All shareholders have access to effective remedies in case of rights violations	Prinsip 7 menjelaskan mengenai pemenuhan hak pemegang saham dan perlakuan adil bagi pemegang saham, bagaimana cara kerja sama aktif antara Perseroan dengan pemegang sahamnya dilaksanakan serta pelaksanaan sebagian hak pemegang saham secara efektif melalui RUPS. This principle addresses the fulfillment and fair treatment of shareholders' rights, outlines how the Company actively engages with shareholders, and supports the effective exercise of shareholder rights through the General Meeting of Shareholders (GMS).
Prinsip 8: Hak Pemangku Kepentingan **Principle 8:** Stakeholders' Rights	Perseroan mengakui hak-hak pemangku kepentingan yang ditetapkan dalam peraturan perundang-undangan yang berlaku atau suatu perjanjian yang disepakati oleh Perseroan dan mendorong kerja sama aktif dengan pemangku kepentingan dalam menciptakan kekayaan, lapangan kerja, dan keberlanjutan usaha yang sehat secara finansial. The Company acknowledges the rights of stakeholders as defined by applicable laws or agreements and promotes active cooperation with stakeholders to create value, employment, and financially sustainable operations.	Prinsip 8 menjelaskan peran Direksi dan Dewan Komisaris mengintegrasikan aspek keberlanjutan dalam model bisnis bank, melaksanakan pelibatan pemangku kepentingan, serta memastikan perlindungan terhadap hak-hak para pemangku kepentingan. Dewan Komisaris memantau pengintegrasian semua aspek tersebut di atas yang dilakukan oleh Direksi. This principle describes how the Board of Directors and Board of Commissioners integrate sustainability aspects into the business model, engage stakeholders, and ensure the protection of stakeholder rights. The Board of Commissioners monitors the implementation of these aspects by the Board of Directors.

Struktur Tata Kelola Perseroan
Corporate Governane Structure

Berpedoman pada Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas, Perseroan menetapkan kerangka tata kelola yang memastikan adanya kejelasan fungsi, pembagian kewenangan dan tanggung jawab, mekanisme kerja, proses pengambilan keputusan, serta sistem pelaporan yang terintegrasi di seluruh organ Perseroan. Kerangka tersebut dirancang untuk mendukung proses pengelolaan perusahaan yang efektif, akuntabel, dan transparan.

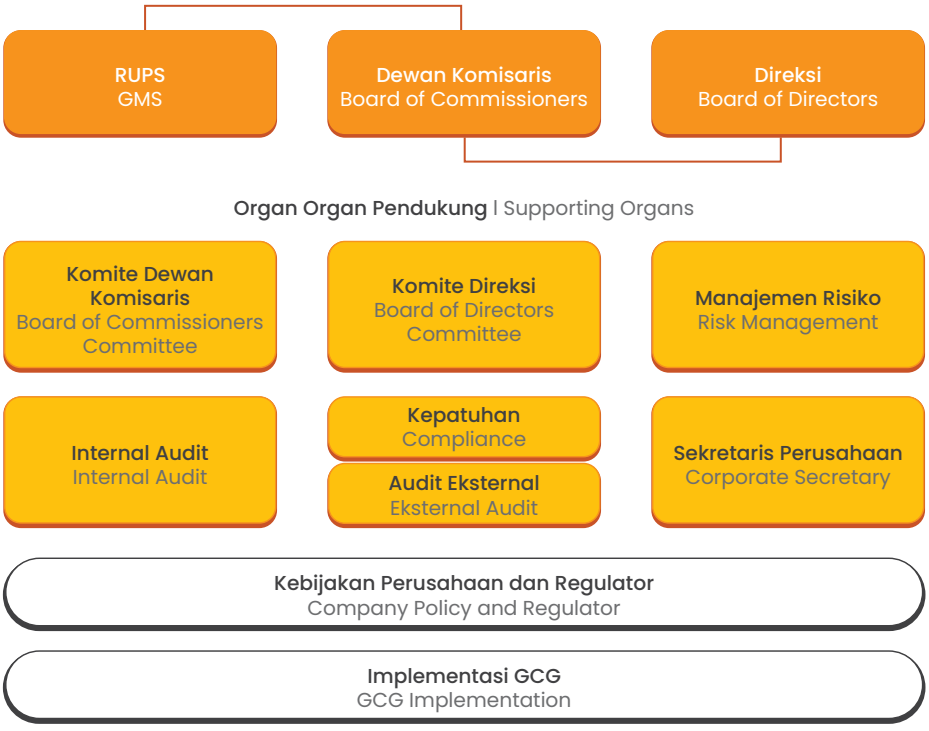
Struktur tata kelola Perseroan meliputi Rapat Umum Pemegang Saham (RUPS) sebagai organ dengan kewenangan tertinggi, Dewan Komisaris yang menjalankan fungsi pengawasan serta pemberian nasihat kepada Direksi, dan Direksi yang bertanggung jawab atas pengurusan serta kegiatan operasional Perseroan. Dalam melaksanakan tugasnya, Dewan Komisaris didukung oleh organ pendukung sesuai ketentuan yang berlaku, sementara Direksi dibantu oleh komite serta unit kerja yang disusun sesuai dengan struktur organisasi yang berlaku.

Adapun gambaran menyeluruh mengenai struktur tata kelola perusahaan disajikan dalam bagan berikut:

Referring to Law No. 40 of 2007 on Limited Liability Companies, the Company has established a governance framework that ensures clarity regarding the functions, division of authority and responsibilities, working mechanisms, decision-making processes, and integrated reporting system across all of the Company's organs. This framework is designed to support the effectiveness, accountability, and transparency of the Company's management processes.

The Company's governance structure comprises the General Meeting of Shareholders (GMS) as the highest organ; the Board of Commissioners, which performs supervisory functions and provides advice to the Board of Directors; and the Board of Directors, which is responsible for the management and operational activities of the Company. In carrying out its duties, the Board of Commissioners is assisted by supporting organs as required by applicable regulations, while the Board of Directors is supported by committees and work units established in accordance with the applicable organizational structure.

A comprehensive overview of the corporate governance structure is presented in the following chart:



Pemegang Saham
Shareholders

Pemegang Saham merupakan individu atau badan hukum yang secara sah memiliki satu atau lebih saham Perseroan dan karenanya berhak untuk menjalankan hak-hak yang melekat pada kepemilikan saham tersebut sesuai dengan ketentuan hukum yang berlaku. Perseroan senantiasa berupaya melindungi kepentingan seluruh pemegang saham secara adil dan setara dengan berlandaskan Anggaran Dasar, kebijakan internal dalam hierarki kebijakan Perseroan, serta peraturan perundang-undangan yang berlaku di Indonesia.

Shareholders are individuals or legal entities that legally own one or more shares of the Company and are therefore entitled to exercise the rights associated with their share ownership in accordance with applicable laws. The Company consistently strives to protect the interests of all shareholders fairly and equally based on the Articles of Association, internal policies within the Company's policy hierarchy, as well as the applicable laws and regulations in Indonesia.

Hak dan Kewajiban Pemegang Saham

Sejalan dengan POJK 17 Tahun 2023 dan SEOJK No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum, pemegang saham Perseroan memiliki peran dalam mendukung terlaksananya kegiatan usaha Perseroan yang sehat dan menjaga kesinambungan usaha Perseroan. Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas mengatur bahwa pemegang saham memiliki hak untuk memberikan suara dalam pengambilan keputusan tertentu yang berkaitan dengan Perseroan, serta memiliki kesempatan untuk dipilih sebagai anggota Direksi sesuai dengan ketentuan yang berlaku. Selain itu, pemegang saham juga memiliki hak-hak sebagai berikut:

1. Menghadiri RUPS, baik secara langsung maupun melalui kuasa, menyampaikan pandangan atas agenda RUPS, serta berpartisipasi dalam proses pengambilan keputusan sesuai dengan jumlah saham yang dimiliki;
2. Memperoleh informasi yang akurat, memadai, dan tepat waktu terkait Perseroan sepanjang relevan dengan agenda RUPS dan tidak bertentangan dengan kepentingan Perseroan, guna mendukung pengambilan keputusan yang bertanggung jawab;
3. Mengajukan usulan mata acara RUPS sesuai dengan ketentuan yang berlaku;
4. Mengusulkan calon anggota Dewan Komisaris dan/atau Direksi;
5. Memperoleh pembayaran dividen sesuai dengan prosedur dan ketentuan yang berlaku;

Shareholders' Rights and Obligations

In accordance with POJK No. 17 of 2023 and SEOJK No. 14/SEOJK.03/2025 regarding the Implementation of Corporate Governance for Commercial Banks, the Company's shareholders are responsible for supporting the realization of the Company's sound business operations and ensuring the continuity of the Company's business. Law No. 40 of 2007 on Limited Liability Companies stipulates that shareholders have the right to vote on certain decisions related to the Company, as well as the opportunity to be elected as members of the Board of Directors in accordance with applicable regulations. In addition, shareholders also have the following rights:

1. Attend the GMS, either in person or by proxy, express views on the GMS agenda, and participate in the decision-making process in proportion to the number of shares held;
2. Receive accurate, adequate, and timely information regarding the Company, as long as it is relevant to the GMS agenda and does not conflict with the Company's interests, to support responsible decision-making;
3. Submit proposals for GMS agenda items in accordance with applicable regulations;
4. Nominate candidates for the Board of Commissioners and/or the Board of Directors;
5. Receive dividend payments in accordance with applicable procedures and regulations;

6. Menjalankan hak dan/atau kewenangan lainnya sebagaimana diatur dalam Anggaran Dasar dan peraturan perundang-undangan, termasuk dalam hal persetujuan penambahan modal, perubahan Anggaran Dasar, serta pengalihan sebagian atau seluruh kekayaan Perseroan yang berimplikasi pada penjualan perusahaan.

Di samping hak-hak tersebut, pemegang saham juga memiliki tanggung jawab, antara lain:

1. Mematuhi ketentuan Anggaran Dasar Perseroan serta peraturan perundang-undangan yang berlaku;
2. Pemegang saham pengendali berkewajiban memperhatikan dan melindungi kepentingan pemegang saham minoritas serta pemegang saham lainnya sesuai ketentuan yang berlaku;
3. Pemegang saham minoritas bertanggung jawab untuk menggunakan haknya secara bertanggung jawab dan sesuai dengan peraturan perundang-undangan serta Anggaran Dasar Perseroan.

6. Exercise other rights and/or authorities as stipulated in the Articles of Association and applicable laws and regulations, including regarding approval of capital increases, amendments to the Articles of Association, and the transfer of part or all of the Company's assets that implies the sale of the company.

In addition to these rights, shareholders also have the following responsibilities, among others:

1. Complying with the provisions of the Company's Articles of Association and applicable laws and regulations;
2. Controlling shareholders are obligated to consider and protect the interests of minority shareholders and other shareholders in accordance with applicable provisions;
3. Minority shareholders are responsible for exercising their rights responsibly and in accordance with applicable laws and regulations as well as the Company's Articles of Association.

Rapat Umum Pemegang Saham (RUPS)
General Meeting of Shareholders (GMS)

Rapat Umum Pemegang Saham (RUPS) merupakan organ tertinggi dalam struktur tata kelola Perseroan yang memegang kewenangan tertinggi dan tidak didelegasikan kepada Dewan Komisaris maupun Direksi. Melalui RUPS, para pemegang saham dapat menyalurkan haknya secara transparan dan setara, termasuk menyampaikan pendapat serta memberikan suara dalam pengambilan keputusan strategis yang berkaitan dengan arah dan pengembangan Perseroan.

The General Meeting of Shareholders (GMS) is the highest organ in the Company's governance structure, holding the highest authority, which is not delegated to the Board of Commissioners or the Board of Directors. Through the GMS, shareholders can exercise their rights transparently and equitably, including expressing their opinions and casting votes on strategic decisions regarding the Company's direction and development.

RUPS memiliki peran strategis dalam menetapkan kebijakan fundamental dan arah Perseroan sebagaimana diatur dalam Anggaran Dasar. Dalam pelaksanaannya, RUPS terdiri atas RUPS Tahunan (RUPST) dan RUPS Luar Biasa (RUPSLB).

The GMS has a strategic role in establishing the Company's fundamental policies and direction as stipulated in the Articles of Association. In practice, the GMS consists of the Annual General Meeting of Shareholders (AGMS) and the Extraordinary General Meeting of Shareholders (EGMS).

RUPS 2025

2025 GMS

Sepanjang tahun 2025, Perseroan telah menyelenggarakan RUPS sebanyak 4 (empat) kali, yang terdiri dari 1 (satu) kali RUPS Tahunan dan 3 (tiga) kali RUPS Luar Biasa. Rincian pelaksanaan, keputusan yang dihasilkan, serta tindak lanjut atas keputusan RUPST dan RUPSLB tersebut selama tahun 2025 diuraikan sebagai berikut:

Throughout 2025, the Company held the GMS four (4) times, consisting of one (1) Annual General Meeting of Shareholders and three (3) Extraordinary General Meetings of Shareholders. Details regarding the organization, resolutions, and follow-up actions on the AGMS and EGMS resolutions in 2025 are outlined as follows:

RUPS Tahunan (RUPST) 27 Mei 2025
Annual GMS (AGMS) on May 27, 2025

Tanggal Date	27 Mei 2025 May 27, 2025
Waktu Time	14:54 WIB - 16:30 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 54,384% atau 7.260.582.094 suara dari total 13.350.482.346 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting was attended by the Shareholders and their proxies representing 54.384% or 7,260,582,094 votes out of a total of 13,350,482,346 shares issued by the Company with valid voting rights.
Pimpinan RUPST Chairman of AGMS	Inkawan D Jusi selaku Komisaris Utama Independen Inkawan D Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi 2. Pramoda Dei Sudarmo*) 3. Kreisna Dewantara Gozali *) Hadir melalui telekonferensi Attended via teleconference

Kehadiran Direksi Attendance of BOD	1. Eri Budiono 2. Aditya Wahyu Windarwo 3. Ricko Irwanto
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Dr. Agung Iriantoro SH.,MH. selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Dr. Agung Iriantoro, S.H., M.H., as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama - 27 Mei 2025
First Meeting Agenda – May 27, 2025

Mata Acara Agenda	Persetujuan Laporan Tahunan termasuk pengesahan Laporan Keuangan serta Laporan Tugas Pengawasan Dewan Komisaris untuk tahun buku yang berakhir 31 Desember 2024. Approval of the Annual Report including the ratification of the Financial Statements and the Board of Commissioners' Supervisory Report for the financial year ended 31 December 2024.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.221.322.752 99,46%	0 0,00%	39.259.342 0,54%
Keputusan Mata Acara Pertama Resolution of the First Agenda	1. Menyetujui Laporan Tahunan dan mengesahkan Laporan Keuangan Tahunan untuk Tahun Buku yang berakhir pada 31 Desember 2024 yang telah diaudit Kantor Akuntan Publik Purwantono, Sungkoro & Surja (Ernst & Young) sesuai Laporan Nomor 00347/2.1032/AU.1/07/0242-4/1/III/2025 tanggal 24 Maret 2025 dengan opini wajar dalam semua hal yang material serta menyetujui Laporan Pertanggung Jawaban Direksi dan Laporan Tugas Pengawasan Dewan Komisaris. 2. Memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya ("*volledig acquit et decharge*") kepada anggota Direksi dan Dewan Komisaris Perseroan atas tindakan pengurusan dan pengawasan yang telah mereka jalankan selama tahun buku 2024 sepanjang tindakan mereka tersebut tercermin dalam Laporan Tahunan dan Laporan Keuangan Perseroan yang berakhir pada tanggal 31 Desember 2024 tersebut, kecuali untuk perbuatan penggelapan, penipuan dan tindak pidana lainnya.		

Mata Acara Rapat Pertama - 27 Mei 2025 First Meeting Agenda – May 27, 2025			
	1. Approved the Company's Annual Report and ratified the Annual Financial Statements for the financial year ended December 31, 2024 as audited by the Public Accounting Firm of Purwantono, Sungkoro & Surja (Ernst & Young) in accordance with Report No. 00347/2.1032/AU.1/07/0242-4/1/III/2025 dated March 24, 2025, with an opinion that the Financial Statements present fairly, in all material respects, and approved the Accountability Report of the Board of Directors and the Supervisory Duties Report of the Board of Commissioners; 2. Granted full release and discharge ("volledig acquit et decharge") to the members of the Board of Directors and the Board of Commissioners of the Company for the management and supervisory actions performed during the financial year 2024, provided that such actions are reflected in the Company's Annual Report and Financial Statements for the financial year ended December 31, 2024, except for acts of embezzlement, fraud, and other criminal offenses.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Kedua - RUPST 27 Mei 2025 Second Meeting Agenda – AGMS May 27, 2025			
Mata Acara Agenda	Penetapan penggunaan laba bersih Perseroan untuk tahun buku 2024. Determination of the Company's net profit appropriation for the financial year 2024.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.220.481.652 99,54%	0 0,00%	40.100.442 0,55%
Keputusan Mata Acara Kedua Resolution of the Second Agenda	Menyetujui penggunaan Laba Bersih Perseroan untuk tahun buku 2024 seluruhnya digunakan sebagai laba ditahan Perseroan Approved the appropriation of the Company's Net Profit for the financial year 2024 in its entirety to retained earnings.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Ketiga - 27 Mei 2025 Third Meeting Agenda – May 27, 2025			
Mata Acara Agenda	Penunjukan Kantor Akuntan Publik untuk melakukan audit Laporan Keuangan Perseroan untuk tahun buku 2025. Appointment of a Public Accounting Firm to audit the Company's Financial Statements for the financial year 2025.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.220.703.411 99,45%	5.678.341 0,08%	34.200.342 0,47%

Mata Acara Rapat Ketiga - 27 Mei 2025 Third Meeting Agenda – May 27, 2025			
Keputusan Mata Acara Ketiga Resolution of the Third Agenda	1. Menyetujui pelimpahan wewenang Rapat Umum Pemegang Saham kepada Dewan Komisaris untuk menunjuk dan menetapkan Kantor Akuntan Publik (KAP) guna melakukan pemeriksaan atas Laporan Keuangan Perseroan yang akan berakhir pada 31 Desember 2025, dengan kriteria termasuk namun tidak terbatas pada: a. Kantor Akuntan Publik wajib memiliki izin yang masih berlaku dari Menteri; b. Kantor Akuntan Publik wajib terdaftar dalam daftar aktif pada Otoritas Jasa Keuangan; dan c. Kantor Akuntan Publik merupakan pihak yang independen dan profesional untuk mengaudit laporan keuangan Perseroan untuk tahun buku 2025; dan dengan memperhatikan rekomendasi dari Komite Audit serta berpedoman pada ketentuan yang diatur dalam POJK Nomor 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam kegiatan Jasa Keuangan dan SEOJK No. 18/SEOJK.03/2023 tentang Tata Cara Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan. 2. Memberi kuasa kepada Dewan Komisaris untuk menetapkan besarnya honorarium profesional dan persyaratan lainnya yang wajar sehubungan dengan penunjukan Kantor Akuntan Publik (KAP) tersebut. 1. Approved of the delegation of authority of the General Meeting of Shareholders to the Board of Commissioners to appoint and determine the Public Accounting Firm (KAP) to audit of the Company's Financial Statements which will end on December 31, 2025, with criteria including but not limited to: a. The Public Accounting Firm must have a valid license from the Minister; b. The Public Accounting Firm must be registered in the active list at the Financial Services Authority; c. The Public Accounting Firm is one of the big four members and; The Public Accounting Firm is an independent and professional party to audit the Company's financial statements for the financial year 2025; by considering the recommendations of the Audit Committee and guided by the provisions stipulated in POJK No. 9 of 2023 concerning the Use of Public Accountant Services and Public Accounting Firms in Financial Services activities and SEOJK No. 18/SEOJK.03/2023 concerning Procedures for the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities. 2. Authorized the Board of Commissioners to determine the amount of professional honorarium and other reasonable requirements in connection with the appointment of the Public Accounting Firm (KAP).		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Keempat - RUPST 27 Mei 2025 Fourth Meeting Agenda – AGMS May 27, 2025			
Mata Acara Agenda	Penetapan gaji dan tunjangan Direksi Perseroan serta gaji atau honorarium dan tunjangan Dewan Komisaris Perseroan. Determination of salaries and benefits of the Company's Board of Directors and salaries or honorarium and benefits of the Company's Board of Commissioners.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.220.443.452 99,45%	32.200 0,00%	40.106.442 0,55%

Mata Acara Rapat Keempat - RUPST 27 Mei 2025 Fourth Meeting Agenda – AGMS May 27, 2025			
Keputusan Mata Acara Keempat Resolution of the Fourth Agenda	Menyetujui pelimpahan wewenang Rapat Umum Pemegang Saham kepada Dewan Komisaris untuk menetapkan Gaji dan Tunjangan Direksi Perseroan serta Gaji atau Honorarium dan Tunjangan Dewan Komisaris Perseroan. Approved the delegation of authority of the General Meeting of Shareholders to the Board of Commissioners to determine the Salary and Benefits of the Company's Board of Directors and the Salary or Honorarium and Benefits of the Company's Board of Commissioners.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Kelima - RUPST 27 Mei 2025 Fifth Meeting Agenda – AGMS May 27, 2025			
Mata Acara Agenda	Perubahan Susunan Pengurus Perseroan Changes in the composition of the Company's Management		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.807.096.656 93,75%	419.285.096 5,78%	34.200.342 0,47%
Keputusan Mata Acara Kelima Resolution of the Fifth Agenda	Menyetujui pengangkatan Bapak Daniel Armanto untuk menjadi Direktur Teknologi Sistem Informasi Perseroan yang akan berlaku efektif setelah mendapat persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan (*fit and proper test*) dan memenuhi peraturan perundang-undangan yang berlaku, dengan periode masa jabatan 5 (lima) tahun sampai dengan penutupan Rapat Umum Pemegang Saham Tahunan (RUPS-Tahunan) yang akan diselenggarakan pada tahun 2030 dan dengan memperhatikan peraturan perundang-undangan di bidang Pasar Modal, namun demikian dengan tidak mengurangi hak Rapat Umum Pemegang Saham Perseroan untuk memberhentikannya sewaktu-waktu sebelum masa jabatannya berakhir. Menunjuk dan memberi kuasa dengan hak substitusi kepada Direksi Perseroan untuk melakukan segala tindakan yang berhubungan dengan keputusan Rapat ini, termasuk namun tidak terbatas untuk menghadap pihak berwenang, mengadakan pembicaraan, memberi dan/atau meminta keterangan, mengajukan permohonan pemberitahuan atas perubahan susunan Pengurus Perseroan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia maupun instansi berwenang terkait lainnya, membuat atau serta menandatangani akta-akta dan surat-surat maupun dokumen-dokumen lainnya yang diperlukan atau dianggap perlu, hadir di hadapan Notaris untuk dibuatkan dan menandatangani akta pernyataan keputusan Rapat Perseroan dan melaksanakan hal-hal lain yang harus dan/atau dapat dijalankan untuk dapat terealisasi/terwujudnya keputusan Rapat. Dengan demikian susunan Direksi dan anggota Dewan Komisaris Perseroan menjadi sebagai berikut: **DIREKSI** - Direktur Utama : Eri Budiono - Direktur Kepatuhan : Ricko Irwanto - Direktur Bisnis : Aditya Wahyu Windarwo - Direktur Teknologi Sistem Informasi : Daniel Armanto*) **DEWAN KOMISARIS** - Komisaris Utama Independen : Inkawan D. Jusi - Komisaris : Kreisna Dewantara Gozali - Komisaris Independen : Pramoda Dei Sudarmo *) Pengangkatan Direktur Teknologi Sistem Informasi tersebut berlaku efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan (*fit and proper test*) dan telah memenuhi seluruh ketentuan perundang-undangan yang berlaku di Indonesia.		

Mata Acara Rapat Kelima - RUPST 27 Mei 2025 Fifth Meeting Agenda – AGMS May 27, 2025	
	Approved the appointment of Mr. Daniel Armanto as Director of Information System Technology of the Company which will be effective after obtaining approval from the Financial Services Authority for a fit and proper test and fulfilling the prevailing laws and regulations, with a term of office of 5 (five) years until the closing of the Annual General Meeting of Shareholders (AGMS) which will be held in 2030 and with due observance of the laws and regulations in the Capital Market sector, however without prejudice to the right of the General Meeting of Shareholders of the Company to dismiss him at any time before his term of office ends. Appointed and authorized with the right of substitution to the Board of Directors of the Company to take all actions related to the resolutions of this Meeting, including but not limited to appearing before the authorities, holding talks to give and/or request information, submitting applications for notification of changes in the composition of the Board of Directors and Board of Commissioners of the Company to the Minister of Law and Human Rights of the Republic of Indonesia and other relevant authorities, making or and signing deeds and letters and other documents that are necessary or deemed necessary, appearing before a Notary to make and sign a deed of statement of the Company's Meeting resolutions and carrying out other matters that must be and/or can be carried out for the realization of the Meeting resolutions. Therefore, the composition of the Company's Board of Directors and Board of Commissioners is as follows: BOARD OF DIRECTORS - President Director : Eri Budiono - Director of Compliance : Ricko Irwanto - Director of Business : Aditya Wahyu Windarwo - Director of Information System Technology : Daniel Armanto*) BOARD OF COMMISSIONERS - Independent President Commissioner : Inkawan D. Jusi - Commissioner : Kreisna Dewantara Gozali - Independent Commissioner : Pramoda Dei Sudarmo *) The appointment of the Director of Information System Technology is effective upon approval from the Financial Services Authority for the fit and proper test and has complied with all applicable laws and regulations in Indonesia.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Keenam - RUPST 27 Mei 2025 Sixth Meeting Agenda – AGMS May 27, 2025	
Mata Acara Agenda	Laporan Rencana Aksi Keuangan Berkelanjutan (RAKB) Report of the Sustainable Finance Action Plan (RAKB) of the Company
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None
Keputusan Mata Acara Keenam Resolution of the Sixth Agenda	Mata Acara Keenam Rapat ini bersifat laporan, maka tidak diadakan pengambilan keputusan. Sixth Agenda Item was submitted as a report and did not require any resolution of the Meeting.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Ketujuh - RUPST 27 Mei 2025 Seventh Meeting Agenda – AGMS May 27, 2025	
Mata Acara Agenda	Laporan Pertanggungjawaban Realisasi Penggunaan Dana Hasil Penawaran Umum Terbatas V (PUT V) dengan Hak Memesan Efek Terlebih Dahulu (HMETD) Accountability Report on the Realization of the Use of Proceeds from the Limited Public Offering V (PUT V) with Pre-emptive Rights (HMETD).
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None
Keputusan Mata Acara Ketujuh Resolution of the Seventh Agenda	Mata Acara Ketujuh Rapat ini bersifat laporan, maka tidak diadakan pengambilan keputusan. Seventh Agenda Item was submitted as a report and did not require any resolution of the Meeting.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Kedelapan - RUPST 27 Mei 2025 Eight Meeting Agenda – AGMS May 27, 2025	
Mata Acara Agenda	Laporan Pertanggungjawaban Realisasi Penggunaan Dana Hasil Penawaran Umum Terbatas VI (PUT VI) dengan Hak Memesan Efek Terlebih Dahulu (HMETD) Accountability Report on the Realization of the Use of Proceeds from the Limited Public Offering VI (PUT VI) with Pre-emptive Rights (HMETD).
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None
Keputusan Mata Acara Kedelapan Resolution of the Eighth Agenda	Mata Acara Kedelapan Rapat ini bersifat laporan, maka tidak diadakan pengambilan keputusan. Eighth Agenda Item was submitted as a report and did not require any resolution of the Meeting.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Kesembilan - RUPST 27 Mei 2025 Ninth Meeting Agenda – AGMS May 27, 2025	
Mata Acara Agenda	Laporan Pertanggungjawaban Realisasi Penggunaan Dana Hasil Penawaran Umum Terbatas VII (PUT VII) dengan Hak Memesan Efek Terlebih Dahulu (HMETD). Accountability Report on the Realization of the Use of Proceeds from the Limited Public Offering VII (PUT VII) with Pre-emptive Rights (HMETD).
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None
Keputusan Mata Acara Kesembilan Resolution of the Ninth Agenda	Mata Acara Kesembilan Rapat ini bersifat laporan, maka tidak diadakan pengambilan keputusan. Ninth Agenda Item was submitted as a report and did not require any resolution of the Meeting.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Kesepuluh - RUPST 27 Mei 2025 Tenth Meeting Agenda – AGMS May 27, 2025			
Mata Acara Agenda	Persetujuan Perubahan Penggunaan Dana Hasil Penawaran Umum Terbatas V (PUT V) dengan Hak Memesan Efek Terlebih Dahulu (HMETD) Approval of the Change in the Use of Proceeds from the Limited Public Offering V (PUT V) with Pre-emptive Rights (HMETD).		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.807.096.561 93,75%	419.285.096 5,78%	34.200.342 0,47%
Keputusan Mata Acara Kesepuluh Resolution of the Tenth Agenda	Menyetujui Perubahan Penggunaan Dana Hasil Penawaran Umum Terbatas V (PUT V) dengan Hak Memesan Efek Terlebih Dahulu (HMETD). Rencana penggunaan Dana Hasil Penawaran Umum Terbatas V (PUT V) dengan Hak Memesan Efek Terlebih Dahulu (HMETD) menjadi sebagai berikut: • Penyaluran kredit sebesar Rp444.794.496.072,- • Kegiatan Operasional Perbankan sebesar Rp1.001.107.915.560,- • Pengembangan Teknologi Informasi sebesar Rp681.451.908.933,- • Memperkuat Rasio KPMM sebesar Rp375.415.468.335,-. Approve the Change in the Use of Proceeds from the Limited Public Offering V (PUT V) with Pre-emptive Rights (HMETD). The planned use of proceeds from the Limited Public Offering V (PUT V) with Preemptive Rights (HMETD) is as follows: • Credit disbursement in the amount of Rp444,794,496,072 • Banking operational activities in the amount of Rp1,001,107,915,560 • Information Technology development in the amount of Rp681,451,908,933 • Strengthening the KPMM ratio in the amount of Rp375,415,468,335.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Kesebelas - RUPST 27 Mei 2025 Eleventh Meeting Agenda – AGMS May 27, 2025			
Mata Acara Agenda	Persetujuan Perubahan Penggunaan Dana Hasil Penawaran Umum Terbatas VI (PUT VI) dengan Hak Memesan Efek Terlebih Dahulu (HMETD) Approval of the Change in the Use of Proceeds from the Limited Public Offering VI (PUT VI) with Pre-emptive Rights (HMETD).		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.807.096.561 93,75%	419.285.091 5,78%	34.200.442 0,47%
Keputusan Mata Acara Kesebelas Resolution of the Eleventh Agenda	Menyetujui Perubahan Penggunaan Dana Hasil Penawaran Umum Terbatas VI (PUT VI) dengan Hak Memesan Efek Terlebih Dahulu (HMETD). Rencana penggunaan Dana Hasil Penawaran Umum Terbatas VI (PUT VI) dengan Hak Memesan Efek Terlebih Dahulu (HMETD) menjadi sebagai berikut: • Ekspansi Kredit sebesar Rp1.014.104.429.766,- • Kegiatan Operasional Perbankan sebesar Rp676.069.619.844,-. Approve the Change in the Use of Proceeds from the Limited Public Offering VI (PUT VI) with Pre-emptive Rights (HMETD). The planned use of proceeds from the Limited Public Offering VI (PUT VI) with Preemptive Rights (HMETD) is as follows: • Credit expansion in the amount of Rp1,014,104,429,755,- • Banking Operations in the amount of Rp676,069,619,844,-		
Realisasi Realization	Sudah direalisasikan Realized		

RUPS Luar Biasa (RUPSLB) 27 Mei 2025
Extraordinary GMS (EGMS) May 27, 2025

Tanggal Date	27 Mei 2025 May 27, 2025
Waktu Time	16:38 WIB- 16:38 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 54,424 % atau 7.265.965.731 suara dari total 13.350.482.346 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The meeting was attended by Shareholders and their Proxies representing 54.424% or 7,265,965,731 shares of the total 13,350,482,346 shares issued by the Company with valid voting rights.
Pimpinan RUPSLB Chairman of EGMS	Inkawan D. Jusi selaku Komisaris Utama Independen Inkawan D. Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi 2. Pramoda Dei Sudarmo*) 3. Kreisna Dewantara Gozali *) Hadir melalui telekonferensi Attended via teleconferrence
Kehadiran Direksi Attendance of BOD	1. Eri Budiono 2. Aditya Wahyu Windarwo 3. Ricko Irwanto 4. Daniel Armanto*) *) Berlaku efektif setelah persetujuan Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan *(fit and proper test)*. Effective upon approval from the Financial Services Authority on the fit and proper test results
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Dr. Agung Iriantoro SH.,MH. selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Dr. Agung Iriantoro, S.H., M.H., as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama – RUPSLB 27 Mei 2025 First Meeting Agenda – EGMS May 27, 2025	
Mata Acara Agenda	Perubahan Anggaran Dasar Perseroan Amendment to the Company's Articles of Association
Karena tidak memenuhi kuorum, Rapat belum dapat diselenggarakan untuk dapat mengambil keputusan yang sah dan mengikat untuk keseluruhan agenda Rapat. The Meeting could not be convened to adopt valid and binding resolutions for the entire agenda of the Meeting	

RUPS Luar Biasa (RUPSLB) 16 Juni 2025
Extraordinary GMS (EGMS) June 16, 2025

Tanggal Date	16 Juni 2025 June 16, 2025
Waktu Time	16:34 WIB - 16:34 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 54,496 % atau 7.275.554.742 suara dari total 13.350.482.346 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting was attended by the Shareholders and their proxies representing 54.496% or 7,275,554,742 votes out of a total of 13,350,482,346 shares issued by the Company with valid voting rights.
Pimpinan RUPSLB Chairman of EGMS	Inkawan D. Jusi selaku Komisaris Utama Independen Inkawan D. Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi
Kehadiran Direksi Attendance of BOD	1. Eri Budiono 2. Aditya Wahyu Windarwo 3. Ricko Irwanto
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Dr. Agung Iriantoro SH.,MH. selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Dr. Agung Iriantoro, S.H., M.H., as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama – RUPSLB 16 Juni 2025 First Meeting Agenda – EGMS – June 16, 2025	
Mata Acara Agenda	Perubahan Anggaran Dasar Perseroan Amendment to the Company's Articles of Association
Karena belum memenuhi kuorum, Rapat belum dapat diselenggarakan untuk dapat mengambil keputusan yang sah dan mengikat untuk keseluruhan agenda Rapat. The Meeting could not be convened to adopt valid and binding resolutions for the entire agenda of the Meeting	

RUPS Luar Biasa (RUPSLB) 16 Oktober 2025
Extraordinary GMS (EGMS) October 16, 2025

Tanggal Date	16 Oktober 2025 October 16, 2025
Waktu Time	14:30 WIB - 14:45 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 57,875 % atau 7.726.655.517 suara dari total 13.350.482.346 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting was attended by the Shareholders and their proxies representing 57.875% or 7,726,655,517 votes out of a total of 13,350,482,346 shares issued by the Company with valid voting rights.
Pimpinan RUPSLB Chairman of EGMS	Inkawan D. Jusi selaku Komisaris Utama Independen Inkawan D. Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi 2. Pramoda Dei Sudarmo
Kehadiran Direksi Attendance of BOD	3. Eri Budiono 4. Aditya Wahyu Windarwo 5. Ricko Irwanto
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Dr. Agung Iriantoro SH.,MH. selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Dr. Agung Iriantoro, S.H., M.H., as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama – RUPSLB 16 Oktober 2025 First Meeting Agenda – EGMS – October 16, 2025			
Mata Acara Agenda	Perubahan susunan Pengurus Perseroan. Changes in the composition of the Company's Management.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak ada None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.343.917.284 95,047%	382.658.033 4,952 %	80.200 0,001%
Keputusan Mata Acara Pertama Resolution of the First Agenda	Menyetujui Pembatalan Pengangkatan Sdr. Daniel Armanto selaku Direktur Teknologi Sistem Informasi yang sebelumnya telah diputuskan dalam Rapat Umum Pemegang Saham pada tanggal 27 Mei 2025. Menunjuk dan memberi kuasa dengan hak substitusi kepada Direksi Perseroan untuk melakukan segala tindakan yang berhubungan dengan keputusan Rapat ini, termasuk namun tidak terbatas untuk menghadap pihak berwenang, mengadakan pembicaraan, memberi dan/atau meminta keterangan, mengajukan permohonan pemberitahuan atas perubahan susunan Direksi dan Dewan Komisaris Perseroan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia maupun instansi berwenang terkait lainnya, membuat atau serta menandatangani akta-akta dan surat-surat maupun dokumen-dokumen lainnya yang diperlukan atau dianggap perlu, hadir di hadapan Notaris untuk dibuatkan dan menandatangani akta pernyataan keputusan Rapat Perseroan dan melaksanakan hal-hal lain yang harus dan/atau dapat dijalankan untuk dapat terealisasi/terwujudnya keputusan Rapat. Dengan demikian susunan Direksi dan anggota Dewan Komisaris Perseroan menjadi sebagai berikut: **DIREKSI** - Direktur Utama : Eri Budiono - Direktur Bisnis : Aditya Wahyu Windarwo - Direktur Kepatuhan : Ricko Irwanto **DEWAN KOMISARIS** - Komisaris Utama Independen : Inkawan D. Jusi - Komisaris : Kreisna Dewantara Gozali - Komisaris Independen : Pramoda Dei Sudarmo		

Mata Acara Rapat Pertama – RUPSLB 16 Oktober 2025 First Meeting Agenda – EGMS – October 16, 2025	
	Approved to Revoke the Appointment of Mr. Daniel Armanto as Director of Information System Technology who was previously appointed at the General Meeting of Shareholders on May 27, 2025. Appointed and authorized with the right of substitution to the Board of Directors of the Company to take all actions related to the resolutions of this Meeting, including but not limited to appearing before the authorities, holding talks to give and/or request information, submitting applications for notification of changes in the composition of the Board of Directors and Board of Commissioners of the Company to the Minister of Law and Human Rights of the Republic of Indonesia and other relevant authorities, making or and signing deeds and letters and other documents that are necessary or deemed necessary, appearing before a Notary to make and sign a deed of statement of the Company's Meeting resolutions and carrying out other matters that must be and/or can be carried out for the realization of the Meeting resolutions./atau dapat dijalankan untuk dapat terealisasi/terwujudnya keputusan Rapat. Therefore, the composition of the Company's Board of Directors and Board of Commissioners is as follows: BOARD OF DIRECTORS - President Director : Eri Budiono - Director of Business : Aditya Wahyu Windarwo - Director of Compliance : Ricko Irwanto BOARD OF COMMISSIONERS - Independent President Commissioner : Inkawan D. Jusi - Commissioner : Kreisna Dewantara Gozali - Independent Commissioner : Pramoda Dei Sudarmo
Realisasi Realization	Sudah direalisasikan Realized

RUPS 2024 2024 GMS

RUPS Luar Biasa (RUPSLB) 31 Januari 2024 Extraordinary GMS (EGMS) January 31, 2024	
Tanggal Date	31 Januari 2024 January 31, 2024
Waktu Time	14:45 WIB - 14:58 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 62,53% atau 7.564.383.911 suara dari total 12.038.815.679 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting The Meeting was attended by Shareholders and Shareholders' Proxies totaling 62,53% or 7.564.383.911 votes out of a total of 12.038.815.679 shares issued by the Company with valid voting rights.
Pimpinan RUPSLB Chairman of EGMS	Tjandra Mindharta Gozali selaku Komisaris Tjandra Mindharta Gozali as Commissioner

Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi*) 2. Tjandra Mindharta Gozali 3. Pramoda Dei Sudarmo **) *) Berlaku efektif setelah persetujuan Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan *(fit and proper test)*. Effective after the approval of the Financial Services Authority on the fit and proper test. **) Hadir melalui media telekonferensi Attended via teleconferrence
Kehadiran Direksi Attendance of BOD	1. Aditya Wahyu Windarwo* 2. Ir. Ricko Irwanto 3. Chen Jun *) Direktur Bisnis merangkap Pjs. Direktur Utama *) Business Director and Acting President Director
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Jose Dima Satria, S.H., M.Kn selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Jose Dima Satria, S.H., M.Kn as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama – RUPSLB 31 Januari 2024
First Meeting Agenda – EGMS January 31 2024

Mata Acara Agenda	Perubahan susunan Pengurus Perseroan. Changes in the composition of the Company's Management.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak ada None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.511.795.695 99,30%	43.730.916 0,58%	8.857.300 0,12%

Mata Acara Rapat Pertama – RUPSLB 31 Januari 2024 First Meeting Agenda – EGMS January 31 2024	
Keputusan Mata Acara Pertama Resolution of the First Agenda	Menyetujui pengunduran diri Sdr. Pamitra Wineka dalam jabatannya sebagai Komisaris Independen Perseroan dengan memberikan pemberian pelunasan dan pembebasan tanggung jawab sepenuhnya *(volledig acquit et de charge)* atas tindakan pengawasan yang dilakukan sejak tanggal pengangkatannya sampai dengan tanggal pengunduran dirinya sepanjang tindakan tersebut tercermin dalam laporan tahunan dan laporan keuangan Perseroan pada tahun bersangkutan, sesuai dengan Anggaran Dasar Perseroan dan hukum yang berlaku, dan bukan merupakan tindak pidana. Menyetujui susunan Direksi dan Dewan Komisaris Perseroan menjadi sebagai berikut: DIREKSI • Penanggung Jawab Sementara Direktur Utama dan Direktur Bisnis : Aditya Wahyu Windarwo • Direktur Kepatuhan : Ricko Irwanto • Direktur Teknologi Sistem Informasi : Chen Jun DEWAN KOMISARIS • Komisaris Utama Independen : Inkawan D Jusi*) • Komisaris : Tjandra Mindharta Gozali • Komisaris Independen : Pramoda Dei Sudarmo *) Pengangkatan Bapak Inkawan D. Jusi selaku Komisaris Utama merangkap Komisaris Independen tersebut berlaku efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan *(fit and proper test)* dan telah memenuhi seluruh ketentuan perundang-undangan yang berlaku di Indonesia; Menunjuk dan memberi kuasa dengan hak substitusi kepada Direksi Perseroan untuk melakukan segala tindakan yang berhubungan dengan keputusan Rapat ini, termasuk namun tidak terbatas untuk menghadap pihak berwenang, mengadakan pembicaraan, memberi dan/atau meminta keterangan, mengajukan permohonan pemberitahuan atas perubahan susunan Direksi dan Dewan Komisaris Perseroan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia maupun instansi berwenang terkait lainnya, membuat aktaserta menandatangani akta-akta dan surat-surat maupun dokumen-dokumen lainnya yang diperlukan atau dianggap perlu, hadir di hadapan Notaris untuk dibuatkan ndan menandatangani akta pernyataan keputusan Rapat Perseroan dan melaksanakan hal-hal lain yang harus dan/atau dapat dijalankan untuk dapat tereliasasi/terwujudnya keputusan Rapat.

Mata Acara Rapat Pertama – RUPSLB 31 Januari 2024 First Meeting Agenda – EGMS January 31 2024	
	Approved the resignation of Mr. Pamitra Wineka in his position as Independent Commissioner of the Company by providing full release and discharge (volledig acquit et de charge) for supervisory actions carried out from the date of his appointment until the date of his resignation to the extent that such actions are reflected in the annual report and financial statements of the Company for the year concerned, in accordance with the Company's Articles of Association and applicable law, and are not a criminal offense. Approval of the composition of the Company's Board of Directors and Board of Commissioners as follows: Board of Directors • Act. President Director and Business Director : Aditya Wahyu Windarwo • Director of Compliance : Ricko Irwanto • Director of Information System Technology : Chen Jun Board of Commissioners • Independent President Commissioner : Inkawan D Jusi*) • Commissioner : Tjandra Mindharta Gozali • Independent Commissioner : Pramoda Dei Sudarmo *)The appointment of Mr. Inkawan D. Jusi as President Commissioner and Independent Commissioner is effective after obtaining approval from the Financial Services Authority for a fit and proper test and has complied with all applicable laws and regulations in Indonesia; Appointed and authorized with the right of substitution to the Board of Directors of the Company to take all actions related to the resolutions of this Meeting, including but not limited to appearing before the authorities, holding talks, giving and/or requesting information, submitting applications for notification of changes in the composition of the Board of Directors and the Board of Commissioners of the Company to the Minister of Law and Human Rights of the Republic of Indonesia and other relevant authorities, making or and signing deeds and letters and other documents that are necessary or deemed necessary, appearing before a Notary to make and sign a deed of statement of the Company's Meeting resolutions and carrying out other matters that must be and/or can be carried out in order to realize/realize the resolutions of the Meeting.
Realisasi Realization	Sudah direalisasikan Realized

RUPS Tahunan (RUPST) 30 April 2024
Annual GMS (AGMS) April 30, 2024

Tanggal Date	30 April 2024 April 30, 2024
Waktu Time	14:31 WIB - 15:18 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 57,10% atau 6.874.497.264 suara dari total 12.038.815.679 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. Meeting was attended by Shareholders and Shareholders' Proxies totaling 57.10% or 6,874,497,264 votes out of a total of 12,038,815,679 shares issued by the Company with valid voting rights.
Pimpinan RUPST Chairman of AGMS	Inkawan D. Jusi selaku Komisaris Utama Independen Inkawan D. Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi 2. Tjandra Mindharta Gozali 3. Pramoda Dei Sudarmo
Kehadiran Direksi Attendance of BOD	1. Aditya Wahyu Windarwo 2. Ir. Ricko Irwanto 3. Chen Jun
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Jose Dima Satria, S.H., M.Kn selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Jose Dima Satria, S.H., M.Kn as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama - RUPST 30 April 2024 First Meeting Agenda - AGMS April 30, 2024	
Mata Acara Agenda	Persetujuan Laporan Tahunan termasuk pengesahan Laporan Keuangan serta Laporan Tugas Pengawasan Dewan Komisaris untuk tahun buku yang berakhir 31 Desember 2023. The approval of the Annual Report including the ratification of the Financial Statements and the Board of Commissioners Oversight Report for the financial year ended December 31, 2023.

Mata Acara Rapat Pertama - RUPST 30 April 2024 First Meeting Agenda - AGMS April 30, 2024			
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.861.568.369 99,81%	30.072 0,0004%	12.898.823 0,19%
Keputusan Mata Acara Pertama Resolution of the First Agenda	Menyetujui Laporan Tahunan dan mengesahkan Laporan Keuangan Tahunan untuk Tahun Buku yang berakhir pada 31 Desember 2023 serta menyetujui Laporan pertanggung jawaban Direksi dan Laporan tugas pengawasan Dewan Komisaris. Approval of the Annual Report and ratification of the Annual Financial Statements for the Financial Year ended December 31, 2023 and approval of the Board of Directors' accountability report and the Board of Commissioners' supervisory duty report. Memberikan pelunasan dan pembebasan tanggung jawab sepenuhnya *("volledig acquit et decharge")* kepada anggota Direksi dan Dewan Komisaris Perseroan atas tindakan pengurusan dan pengawasan yang telah mereka jalankan selama tahun buku 2023 sepanjang tindakan mereka tersebut tercermin dalam Laporan Tahunan dan Laporan Keuangan Perseroan yang berakhir pada tanggal 31-12-2023 (tiga puluh satu Desember dua ribu dua puluh tiga) tersebut, kecuali untuk perbuatan penggelapan, penipuan dan tindak pidana lainnya. Giving full payment and release of responsibility ("volledig acquit et decharge") to the members of the Board of Directors and the Board of Commissioners of the Company for the management and supervision they have carried out during the financial year 2023 as long as their actions are reflected in the Annual Report and Financial Statements of the Company ended on 31-12-2023 (thirty-one December two thousand twenty-three), except for embezzlement, fraud and other criminal acts.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Kedua - RUPST 30 April 2024 Second Meeting Agenda - AGMS April 30, 2024			
Mata Acara Agenda	Penetapan penggunaan laba bersih Perseroan untuk tahun buku 2023. Determination of the Company's net profit appropriation for the financial year 2023.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.865.609.869 99,87%	30.072 0,0004%	8.857.323 0,13%

Keputusan Mata Acara Kedua Resolution of the Second Agenda	Menyetujui dan mengesahkan tidak ada pembagian dividen kepada Pemegang Saham untuk Tahun Buku 2023. Approved and authorized no dividend distribution to Shareholders for the 2023 Financial Year.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Ketiga - RUPST 30 April 2024 Third Meeting Agenda - AGMS April 30, 2024			
Mata Acara Agenda	Penunjukan Kantor Akuntan Publik untuk melakukan audit Laporan Keuangan Perseroan untuk tahun buku 2024. Appointment of a Public Accountant Firm to audit the Company's Financial Statements for the financial year 2024.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.857.618.197 99,75%	8.020.744 0,12%	8.858.323 0,13%
Keputusan Mata Acara Ketiga Resolution of the Third Agenda	• Menyetujui pelimpahan wewenang Rapat Umum Pemegang Saham kepada Dewan Komisaris untuk menunjuk dan menetapkan Kantor Akuntan Publik (KAP) guna melakukan pemeriksaan atas Laporan Keuangan Perseroan yang akan berakhir pada 31 Desember 2024, dengan kriteria termasuk namun tidak terbatas pada: a. Kantor Akuntan Publik wajib memiliki izin yang masih berlaku dari Menteri; b. Kantor Akuntan Publik wajib terdaftar dalam daftar aktif pada Otoritas Jasa Keuangan; c. Kantor Akuntan Publik merupakan salah satu dari anggota *big four* dan; d. Kantor Akuntan Publik merupakan pihak yang independen dan profesional untuk mengaudit laporan keuangan Perseroan untuk tahun buku 2024; dan dengan memperhatikan rekomendasi dari Komite Audit serta berpedoman pada ketentuan yang diatur dalam POJK Nomor 9 tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam kegiatan Jasa Keuangan dan SEOJK No. 18/SEOJK.03/2023 tentang Tata Cara Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan. • Memberi kuasa kepada Dewan Komisaris untuk menetapkan besarnya honorarium profesional dan persyaratan lainnya yang wajar sehubungan dengan penunjukan Kantor Akuntan Publik (KAP) tersebut.		

	• Approval of the delegation of authority of the General Meeting of Shareholders to the Board of Commissioners to appoint and determine the Public Accounting Firm (KAP) to conduct an audit of the Company's Financial Statements which will end on December 31, 2024, with criteria including but not limited to: a. Public Accounting Firm must have a valid license from the Minister; b. Public Accounting Firm must be registered in the active list at the Financial Services Authority; c. Public Accounting Firm is one of the big four members and; d. The Public Accounting Firm is an independent and professional party to audit the Company's financial statements for the financial year 2024; and by considering the recommendations of the Audit Committee and guided by the provisions stipulated in POJK No. 9 of 2023 concerning the Use of Public Accountant Services and Public Accounting Firms in Financial Services activities and SEOJK No. 18/SEOJK.03/2023 concerning Procedures for the Use of Public Accountant Services and Public Accounting Firms in Financial Services Activities. • To authorize the Board of Commissioners to determine the amount of professional honorarium and other reasonable requirements in connection wiith the appointment of the Public Accounting Firm (KAP).
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Keempat - RUPST 30 April 2024 Fourth Meeting Agenda - AGMS April 30, 2024			
Mata Acara Agenda	Penetapan gaji dan tunjangan Direksi Perseroan serta gaji atau honorarium dan tunjangan Dewan Komisaris Perseroan. Determination of salaries and benefits of the Company's Board of Directors and salaries or honorarium and benefits of the Company's Board of Commissioners.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.865.606.469 99,87%	30.072 0,0000043%	8.860.723 0,0012%
Keputusan Mata Acara Keempat Resolution of the Fourth Agenda	Menyetujui pelimpahan wewenang Rapat Umum Pemegang Saham kepada Dewan Komisaris untuk menetapkan Gaji dan Tunjangan Direksi Perseroan serta Gaji atau Honorarium dan Tunjangan Dewan Komisaris Perseroan. Approved the delegation of authority of the General Meeting of Shareholders to the Board of Commissioners to determine the Salary and Benefits of the Company's Board of Directors and the Salary or Honorarium and Benefits of the Company's Board of Commissioners.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Kelima - RUPST 30 April 2024 Fifth Meeting Agenda - AGMS April 30, 2024	
Mata Acara Agenda	Laporan Pertanggungjawaban Realisasi Penggunaan Dana Hasil Penawaran Umum Terbatas V (PUT V) dengan Hak Memesan Efek Terlebih Dahulu (HMETD). Accountability Report on the Realization of the Use of Proceeds from Limited Public Offering V (PUT V) with Pre-emptive Rights (HMETD).
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None
Keputusan Mata Acara Kelima Resolution of the Fifth Agenda	Mata Acara Kelima Rapat ini bersifat laporan, maka tidak diadakan pengambilan keputusan. The Fifth Agenda of the Meeting was a report, therefore no decision was made.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Keenam - RUPST 30 April 2024 Sixth Meeting Agenda - AGMS April 30, 2024	
Mata Acara Agenda	Laporan Pertanggungjawaban Realisasi Penggunaan Dana Hasil Penawaran Umum Terbatas VI (PUT VI) dengan Hak Memesan Efek Terlebih Dahulu (HMETD). Accountability Report on the Realization of the Use of Proceeds from Limited Public Offering VI (PUT VI) with Pre-emptive Rights (HMETD)
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None
Keputusan Mata Acara Keenam Resolution of the Sixth Agenda	Mata Acara Keenam Rapat ini bersifat laporan, maka tidak diadakan pengambilan keputusan. The Sixth Agenda of the Meeting was a report, therefore no decision was made.
Realisasi Realization	Sudah direalisasikan Realized

RUPS Luar Biasa (RUPSLB) 30 April 2024 Extraordinary GMS (EGMS) April 30, 2024	
Tanggal Date	30 April 2024 April 30, 2024
Waktu Time	15:40 WIB - 15:59 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 57,03% atau 6.865.476.478 suara dari total 12.038.815.679 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting was attended by Shareholders and Shareholders' Proxies totaling 57.03% or 6,865,476,478 votes out of a total of 12,038,815,679 shares issued by the Company with valid voting rights.

Pimpinan RUPSLB Chairman of EGMS	Inkawan D Jusi selaku Komisaris Utama Independen Inkawan D Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi 2. Tjandra Mindharta Gozali 3. Pramoda Dei Sudarmo
Kehadiran Direksi Attendance of BOD	4. Aditya Wahyu Windarwo 5. Ir. Ricko Irwanto 6. Chen Jun
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Jose Dima Satria, S.H., M.Kn selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Jose Dima Satria, S.H., M.Kn as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama – RUPSLB 30 April 2024
First Meeting Agenda - EGMS April 30, 2024

Mata Acara Agenda	Perubahan susunan Pengurus Perseroan. Changes in the composition of the Company's Management.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	6.441.136.387 93,82%	424.340.009 6,18%	82 0,00000001%

Mata Acara Rapat Pertama – RUPSLB 30 April 2024 First Meeting Agenda - EGMS April 30, 2024	
Keputusan Mata Acara Pertama Resolution of the First Agenda	1. Menyetujui pengangkatan Bapak Eri Budiono untuk menjadi Direktur Utama Perseroan yang akan berlaku efektif setelah mendapat persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan *(fit and proper test)* dan memenuhi peraturan perundang-undangan yang berlaku, dengan periode masa jabatan 5 (lima) tahun sampai dengan penutupan Rapat Umum Pemegang Saham Tahunan (RUPS-Tahunan) yang akan diselenggarakan pada tahun 2029 dan dengan memperhatikan peraturan perundang-undangan di bidang Pasar Modal, namun demikian dengan tidak mengurangi hak Rapat Umum Pemegang Saham Perseroan untuk memberhentikannya sewaktu-waktu sebelum masa jabatannya berakhir. 2. Menyetujui pengangkatan Bapak Kreisna Dewantara Gozali sebagai Komisaris Perseroan yang akan berlaku efektif setelah mendapat persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan *(fit and proper test)* dan memenuhi peraturan perundang-undangan yang berlaku, dengan periode masa jabatan 3 (tiga) tahun sampai dengan penutupan Rapat Umum Pemegang Saham Tahunan (RUPS-Tahunan) yang akan diselenggarakan pada tahun 2027 dan dengan memperhatikan peraturan perundang-undangan di bidang Pasar Modal, namun demikian dengan tidak mengurangi hak Rapat Umum Pemegang Saham Perseroan untuk memberhentikannya sewaktu-waktu sebelum masa jabatannya berakhir. 3. Menyetujui menerima pengunduran diri Bapak Tjandra Mindharta Gozali sebagai Komisaris Perseroan yang akan berlaku efektif sejak ditutupnya RUPS ini, dengan memberikan pemberian pelunasan dan pembebasan tanggung jawab sepenuhnya (*volledig acquit et de charge*) atas tindakan pengawasan yang dilakukan sejak tanggal pengangkatannya sampai dengan tanggal pengunduran dirinya sepanjang tindakan tersebut tercermin dalam laporan tahunan dan laporan keuangan Perseroan pada tahun yang bersangkutan, sesuai dengan anggaran dasar Perseroan dan hukum yang berlaku, dan bukan merupakan tindak pidana. 4. Mengangkat kembali Bapak Pramoda Dei Sudarmo sebagai Anggota Dewan Komisaris Independen Perseroan dengan periode masa jabatan 3 (tiga) tahun sampai dengan penutupan Rapat Umum Pemegang Saham Tahunan (RUPS-Tahunan) yang akan diselenggarakan pada tahun 2027 dan dengan memperhatikan peraturan perundang-undangan di bidang Pasar Modal, namun demikian dengan tidak mengurangi hak Rapat Umum Pemegang Saham Perseroan untuk memberhentikannya sewaktu-waktu sebelum masa jabatannya berakhir. 5. Dengan demikian susunan Direksi dan anggota Dewan Komisaris Perseroan menjadi sebagai berikut: **Direksi** • Direktur Utama : Eri Budiono*) • Direktur Kepatuhan : Ricko Irwanto • Direktur Bisnis : Aditya Wahyu Windarwo • Direktur Teknologi Sistem Informasi : Chen Jun **Dewan Komisaris** • Komisaris Utama Independen : Inkawan D Jusi • Komisaris : Kreisna Dewantara Gozali*) • Komisaris Independen : Pramoda Dei Sudarmo *) Pengangkatan Direktur Utama dan Anggota Dewan Komisaris tersebut berlaku efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan dan kepatutan (*fit and proper test*) dan telah memenuhi seluruh ketentuan perundang-undangan yang berlaku di Indonesia.
	6. Menunjuk dan memberi kuasa dengan hak substitusi kepada Direksi Perseroan untuk melakukan segala tindakan yang berhubungan dengan keputusan Rapat ini, termasuk namun tidak terbatas untuk menghadap pihak berwenang, mengadakan pembicaraan memberi dan/atau meminta keterangan, mengajukan permohonan pemberitahuan atas perubahan susunan Direksi dan Dewan Komisaris Perseroan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia maupun instansi berwenang terkait lainnya, membuat atau serta menandatangani akta-akta dan surat-surat maupun dokumen-dokumen lainnya yang diperlukan atau dianggap perlu, hadir di hadapan Notaris untuk dibuatkan dan menandatangani akta pernyataan keputusan Rapat Perseroan dan melaksanakan hal-hal lain yang harus dan/atau dapat dijalankan untuk dapat terealisasi/terwujudnya keputusan Rapat.

Mata Acara Rapat Pertama – RUPSLB 30 April 2024 First Meeting Agenda - EGMS April 30, 2024	
	1. Approval of the appointment of Mr. Eri Budiono to be the President Director of the Company which will be effective after obtaining approval from the Financial Services Authority for a fit and proper test and fulfilling the prevailing laws and regulations, with a term of office of 5 (five) years until the closing of the Annual General Meeting of Shareholders (AGM) which will be held in 2029 and with due observance of the laws and regulations in the Capital Market sector, however without prejudice to the right of the General Meeting of Shareholders of the Company to dismiss him at any time before his term of office ends. 2. Approval of the appointment of Mr. Kreisna Dewantara Gozali as Commissioner of the Company, which will be effective after obtaining approval from the Financial Services Authority for a fit and proper test and fulfilling the applicable laws and regulations, with a term of office of 3 (three) years until the closing of the Annual General Meeting of Shareholders (AGM) to be held in 2027 and with due observance of the laws and regulations in the Capital Market sector, without prejudice to the right of the General Meeting of Shareholders of the Company to dismiss him at any time before his term of office expires. 3. Approval to accept the resignation of Mr. Tjandra Mindharta Gozali as Commissioner of the Company which will be effective as of the closing of this GMS, by granting full release and discharge (volledig acquit et de charge) for supervisory actions carried out from the date of his appointment until the date of his resignation to the extent that such actions are reflected in the Company's annual report and financial statements for the year concerned, in accordance with the Company's articles of association and applicable law, and do not constitute a criminal offense. 4. Reappointing Mr. Pramoda Dei Sudarmo as an Independent Member of the Board of Commissioners of the Company with a term of office of 3 (three) years until the closing of the Annual General Meeting of Shareholders (AGM) to be held in 2027 and with due observance of the laws and regulations in the Capital Market sector, without prejudice to the right of the General Meeting of Shareholders of the Company to dismiss him at any time before his term of office expires. 5. Therefore, the composition of the Board of Directors and members of the Board of Commissioners of the Company will be as follows: **Director** • President Director : Eri Budiono*) • Compliance Director : Ricko Irwanto • Business Director : Aditya Wahyu Windarwo • Director of Information Systems and Technology: Chen Jun **Board Of Commissioners** • Independent President Commissioner : Inkawan D Jusi • Commissioner : Kreisna Dewantara Gozali*) • Independent Commissioner : Pramoda Dei Sudarmo *) The appointment of the President Director and Members of the Board of Commissioners is effective upon approval from the Financial Services Authority (Otoritas Jasa Keuangan) for the fit and proper test and has complied with all applicable laws and regulations in Indonesia.
	6. Appoint and authorize with the right of substitution to the Board of Directors of the Company to take all actions related to the resolutions of this Meeting, including but not limited to appearing before the authorities, holding talks to give and/or request information, submitting applications for notification of changes in the composition of the Board of Directors and Board of Commissioners of the Company to the Minister of Law and Human Rights of the Republic of Indonesia and other relevant authorities, making or and signing deeds and letters and other documents that are necessary or deemed necessary, appearing before a Notary to make and sign a deed of statement of the Company's Meeting resolutions and carrying out other matters that must be and/or can be carried out for the realization/realization of f the Meeting resolutions.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat Kedua – RUPSLB 30 April 2024 Second Meeting Agenda - EGMS April 30, 2024	
Mata Acara Agenda	Penyesuaian Anggaran Dasar Perseroan. Amendment to the Company's Articles of Association
Tidak ada pembahasan dan keputusan karena tidak memenuhi kuorum kehadiran. No discussions were held and no resolutions were adopted due to the absence of the required attendance quorum.	

RUPS Luar Biasa (RUPSLB) 28 Agustus 2024
Extraordinary GMS (EGMS) August 28, 2024

Tanggal Date	28 Agustus 2024 August 28, 2024
Waktu Time	14:36 WIB - 14:55 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 59,79% atau 7.982.812.662 suara dari total 13.350.482.346 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting was attended by the Shareholders and their proxies representing 59.79% or 7,982,812,662 votes out of a total of 13,350,482,346 shares issued by the Company with valid voting rights.
Pimpinan RUPSLB Chairman of EGMS	Inkawan D Jusi selaku Komisaris Utama Independen Inkawan D Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi 2. Pramoda Dei Sudarmo *) *) Hadir melalui media telekonferensi *) Attended via teleconference
Kehadiran Direksi Attendance of BOD	1. Eri Budiono 2. Aditya Wahyu Windarwo 3. Ricko Irwanto
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Jose Dima Satria, S.H., M.Kn selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Jose Dima Satria, S.H., M.Kn as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS.
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.

RUPS Luar Biasa (RUPSLB) 28 Agustus 2024
Extraordinary GMS (EGMS) August 28, 2024

Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Board Of Commissioners
- Independent President Commissioner : Inkawan D Jusi

Mata Acara Rapat Pertama – RUPSLB 28 Agustus 2024
First Meeting Agenda - EGMS August 28, 2024

Mata Acara Agenda	Perubahan susunan Pengurus Perseroan. Changes in the composition of the Company's Management.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	2 (dua) pertanyaan 2 (two) questions		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.974.974.303 99,90%	7.837.136 0,10%	1.223 0,00%
	1. Menyetujui pengunduran diri sdr. Chen Jun selaku Direktur Perseroan terhitung sejak ditutupnya Rapat Umum Pemegang Saham Luar Biasa ini. Dengan demikian susunan Direksi dan anggota Dewan Komisaris Perseroan menjadi sebagai berikut : **Direksi** • Direktur Utama : Eri Budiono • Direktur Kepatuhan : Ricko Irwanto • Direktur Bisnis : Aditya Wahyu Windarwo **Dewan Komisaris** • Komisaris Utama Independen : Inkawan D Jusi • Komisaris : Kreisna Dewantara Gozali*) • Komisaris Independen : Pramoda Dei Sudarmo *) Anggota Dewan Komisaris tersebut berlaku efektif setelah mendapatkan persetujuan dari Otoritas Jasa Keuangan atas penilaian kemampuan kepatutan (*fit and proper test*) dan telah memenuhi seluruh ketentuan perundang-undangan yang berlaku di Indonesia. 2. Menunjuk dan memberi kuasa dengan hak substitusi kepada Direksi Perseroan untuk melakukan segala Tindakan yang berhubungan dengan Keputusan Rapat ini, termasuk namun tidak terbatas untuk menghadap pihak berwenang, mengadakan pembicaraan, memberi dan/atau meminta keterangan, mengajukan permohonan pemberitahuan atas perubahan susunan Direksi Perseroan kepada Menteri Hukum dan Hak Asasi Manusia Republik Indonesia maupun instansi berwenang terkait lainnya, membuat atau serta menandatangani akta-akta dan surat-surat maupun dokumen-dokumen lainnya yang diperlukan atau dianggap perlu, hadir di hadapan Notaris untuk dibuatkan dan menandatangani akta pernyataan Keputusan Rapat Perseroan dan melaksanakan hal-hal lain yang harus dan/atau dapat dijalankan untuk dapat terealisasi/terwujudnya Keputusan Rapat.		

Mata Acara Rapat Pertama – RUPSLB 28 Agustus 2024 First Meeting Agenda - EGMS August 28, 2024	
Keputusan Mata Acara Pertama Resolution of the First Agenda	1. Approved the resignation of Mr. Chen Jun as Director of the Company as of the closing of this Extraordinary General Meeting of Shareholders. Therefore, the composition of the Board of Directors and Board of Commissioners of the Company will be as follows: Director • President Director : Eri Budiono • Compliance Director : Ricko Irwanto • Business Director : Aditya Wahyu Windarwo Board Of Commissioners • Independent President Commissioner : Inkawan D Jusi • Commissioner : Kreisna Dewantara Gozali*) • Independent Commissioner : Pramoda Dei Sudarmo *) These members of the Board of Commissioners are effective after obtaining approval from the Financial Services Authority for a fit and proper test and have fulfilled all applicable laws and regulations in Indonesia. 2. Appointed and authorized with the right of substitution to the Board of Directors of the Company to take all actions related to this Meeting Resolution, including but not limited to appearing before the authorities, holding talks, giving and/ or requesting information, submitting applications for notification of changes in the composition of the Board of Directors of the Company to the Minister of Law and Human Rights of the Republic of Indonesia and other relevant authorities, making or and signing deeds and letters and other documents that are necessary or deemed necessary, appearing before a Notary to make and sign a deed of statement of the Meeting Resolution of the Company and carrying out other matters that must be and/or can be carried out for the realization/realization of the Meeting Resolution.
Realisasi Realization	Sudah direalisasikan Realized

Mata Acara Rapat kedua – RUPSLB 28 Agustus 2024 Second Meeting Agenda - EGMS August 28, 2024	
Mata Acara Agenda	Perubahan Anggaran Dasar Perseroan. Changes to the Company's Articles of Association.
Tidak ada pembahasan dan keputusan karena tidak memenuhi kuorum kehadiran. No discussions were held and no resolutions were adopted due to the absence of the required attendance quorum.	

RUPS Luar Biasa (RUPSLB) 15 November 2024
Extraordinary GMS (EGMS) November 15, 2024

Tanggal Date	15 November 2024 November 15, 2024
Waktu Time	14:31 WIB - 15:00 WIB
Lokasi Location	Gedung Pacific Century Place Lantai 23 Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, Jakarta Selatan 12190. Pacific Century Place Building, 23rd Floor Jl. Jend Sudirman Kav. 52-53 No. Lot 10 Senayan, Kebayoran Baru, South Jakarta 12190.
Kuorum Quorum	Rapat dihadiri oleh Pemegang Saham dan Kuasa Pemegang Saham sejumlah 56,53% atau 7.547.367.153 suara dari total 13.350.482.346 lembar saham yang telah dikeluarkan oleh Perseroan dengan hak suara yang sah. The Meeting was attended by Shareholders and Shareholders' Proxies totaling 56.53% or 7,547,367,153 votes out of a total of 13,350,482,346 shares issued by the Company with valid voting rights.

Pimpinan RUPSLB Chairman of EGMS	Inkawan D Jusi selaku Komisaris Utama Independen Inkawan D Jusi as Independent President Commissioner
Kehadiran Dewan Komisaris Attendance of BOC	1. Inkawan D. Jusi
Kehadiran Direksi Attendance of BOD	1. Eri Budiono 2. Aditya Wahyu Windarwo 3. Ricko Irwanto
Pihak Independen yang Melakukan Penghitungan dan/atau Validasi Suara Independent Parties Conducting Vote Counting and/or Validation	Perseroan telah menunjuk pihak-pihak independen yaitu: 1. Jose Dima Satria, S.H., M.Kn selaku Notaris Publik; 2. PT Ficomindo Buana Registrar selaku Biro Administrasi Efek untuk melakukan penghitungan dan/atau melakukan validasi suara dalam RUPS. The Company has appointed the following independent parties: 1. Jose Dima Satria, S.H., M.Kn as the Public Notary; 2. PT Ficomindo Buana Registrar as the Securities Administration Bureau to perform the vote counting and/or validation of votes at the GMS
Mekanisme pemegang saham yang mengajukan pertanyaan dan/atau pendapat Mechanism for Shareholders to Raise Questions and/or Opinions	Dalam setiap mata acara Rapat, pemegang saham dan/atau kuasanya diberikan kesempatan untuk mengajukan pertanyaan dan/atau pendapat yang berhubungan dengan mata acara Rapat yang dibicarakan. For each agenda item of the Meeting, the shareholders and/or their proxies were given the opportunity to raise questions and/or express opinions related to the agenda item being discussed.
Mekanisme pengambilan keputusan Decision making mechanism	Semua keputusan yang dilakukan dengan cara musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, maka dilakukan pemungutan suara dengan cara menghitung jumlah saham yang setuju, abstain maupun yang tidak setuju. All resolutions were adopted by way of deliberation to reach consensus. In the event that consensus could not be reached, voting was conducted by counting the number of shares voting in favor, abstaining, and voting against.

Mata Acara Rapat Pertama – RUPSLB 15 November 2024
First Meeting Agenda - EGMS November 15, 2024

Mata Acara Agenda	Perubahan Rencana Penyesuaian Batas Maksimum Kepemilikan Saham. Changes to the Maximum Shareholding Limit Adjustment Plan.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.098.774.114 94,06%	432.497.593 5,73%	16.095.446 0,21%

Mata Acara Rapat Pertama – RUPSLB 15 November 2024 First Meeting Agenda - EGMS November 15, 2024	
Keputusan Mata Acara Pertama Resolution of the First Agenda	1. Menyetujui rencana dari PT. Akulaku Silvrr Indonesia dan/atau Rockcore Financial Technology Co. Ltd (Akulaku Group), yang merupakan satu kelompok usaha untuk melakukan Penyesuaian Kepemilikan Saham guna menjalankan kepatuhan terhadap peraturan dengan melakukan divestasi saham secara bertahap sebesar minimum sebesar 2% (dua persen) per tahun selama maksimal 5 tahun sehingga kepemilikan saham Akulaku Group pada BNC akan menjadi maksimal 30% (tiga puluh persen). Penyesuaian Kepemilikan Saham melalui pelaksanaan divestasi dapat dilakukan termasuk namun tidak terbatas pada masuknya pemegang saham strategis baru baik melalui pelaksanaan Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu (PMHMETD) atau aksi korporasi lainnya. 2. Memberikan kuasa dan wewenang kepada Direksi Perseroan dengan hak substitusi untuk melaksanakan segala tindakan yang diperlukan berkaitan dengan pelaksanaan divestasi saham yang akan dilakukan oleh PT. Akulaku Silvrr Indonesia dan/atau Rockcore Financial Technology Co. Ltd , termasuk tapi tidak terbatas untuk, membuat atau meminta dibuatkan segala akta-akta, surat-surat, maupun dokumen-dokumen yang diperlukan, hadir di hadapan pihak/pejabat yang berwenang untuk memperoleh persetujuan atau melaporkan hal tersebut kepada pihak/pejabat yang berwenang serta mendaftarkannya dalam daftar perusahaan sebagaimana dimaksud dalam peraturan perundang-undangan yang berlaku. 1. Approved the plan of PT Akulaku Silvrr Indonesia and/or Rockcore Financial Technology Co. Ltd (Akulaku Group), which is a business group to conduct Share Ownership Adjustment to carry out regulatory compliance by divesting shares gradually by a minimum of 2% (two percent) per year for a maximum of 5 years so that Akulaku Group's share ownership in BNC will be a maximum of 30% (thirty percent). Adjustment of Share Ownership through divestment can be carried out including but not limited to the entry of new strategic shareholders either through the implementation of Capital Increase with Pre-emptive Rights (PMHMETD) or other corporate actions. 2. Gave power and authority to the Board of Directors of the Company with the right of substitution to carry out all necessary actions related to the implementation of the divestment of shares to be carried out by PT Akulaku Silvrr Indonesia and/or Rockcore Financial Technology Co. Ltd, including but not limited to, making or requesting all deeds, letters, and documents required, appearing before the authorized party/official to obtain approval or reporting the matter to the authorized party/official and registering it in the company register as referred to in the applicable laws and regulations.
Realisasi Realization	Belum direalisasikan Unrealized

Mata Acara Rapat Kedua – RUPSLB 15 November 2024 Second Meeting Agenda - EGMS November 15, 2024			
Mata Acara Agenda	Persetujuan Rencana Aksi Pemulihan *(Recovery Plan)*. Approval of Recovery Plan.		
Jumlah Pemegang Saham yang Mengajukan Pertanyaan dan/ atau Memberikan Pendapat Total Shareholders Submitting Questions and/or Opinion	Tidak Ada. None		
Hasil Perhitungan Suara Voting Results	Setuju Agree	Tidak Setuju Disagree	Abstain Abstain
	7.531.140.607 99,79%	131.100 0,00%	16.095.446 0,21%
Keputusan Mata Acara Kedua Resolution of the Second Agenda	1. Menyetujui Rencana Aksi *(Recovery Plan)* Perseroan, sebagaimana termuat dalam dokumen Rencana Aksi *(Recovery Plan)* PT Bank Neo Commerce Tbk Tahun 2024 yang antara lain memuat trigger level atas permasalahan permodalan, likuiditas, rentabilitas dan kualitas aset Perseroan dan opsi pemulihannya, dan selanjutnya disampaikan kepada Otoritas Jasa Keuangan. 2. Menyetujui pemberian kuasa dan kewenangan kepada Dewan Komisaris dan Direksi Perseroan untuk melakukan setiap dan seluruh tindakan yang diperlukan sehubungan dengan Rencana Aksi *(Recovery Plan)* Perseroan, dengan memperhatikan ketentuan yang berlaku. 1. Approved the Company's Recovery Plan, as contained in the PT Bank Neo Commerce Tbk 2024 Recovery Plan document, which includes trigger levels for capital, liquidity, profitability and asset quality issues and recovery options, and subsequently submitted to the Financial Services Authority. 2. Approved the granting of power and authority to the Board of Commissioners and Directors of the Company to take any and all necessary actions in connection with the Company's Recovery Plan, with due observance of applicable regulations.		
Realisasi Realization	Sudah direalisasikan Realized		

Mata Acara Rapat Ketiga - RUPSLB 15 November 2024 Third Meeting Agenda - EGMS November 15, 2024	
Mata Acara Agenda	Perubahan Anggaran Dasar Perseroan. Changes to the Company's Articles of Association.
Tidak ada pembahasan dan keputusan karena tidak memenuhi kuorum kehadiran. No discussions were held and no resolutions were adopted due to the absence of the required attendance quorum.	

Dewan Komisaris
Board of Commissioners

Dewan Komisaris merupakan organ Perseroan yang memiliki peran utama dalam melakukan pengawasan atas kebijakan pengurusan serta pelaksanaan pengelolaan Perseroan yang dijalankan oleh Direksi. Selain fungsi pengawasan, Dewan Komisaris juga berwenang memberikan nasihat dan arahan kepada Direksi demi kepentingan Perseroan, sesuai dengan maksud dan tujuan pendirian Perseroan.

Pengangkatan anggota Dewan Komisaris dilakukan melalui Rapat Umum Pemegang Saham (RUPS) setelah memperoleh persetujuan dari Otoritas Jasa Keuangan (OJK) melalui proses *fit and proper test*. Anggota Dewan Komisaris dapat diberhentikan sewaktu-waktu oleh RUPS sesuai dengan ketentuan yang berlaku. Struktur Dewan Komisaris terdiri atas Komisaris Utama, Komisaris Independen, dan Komisaris. Setiap usulan pengangkatan dan/atau penggantian anggota Dewan Komisaris kepada RUPS dilakukan dengan memperhatikan rekomendasi dari Komite Nominasi dan Remunerasi.

The Board of Commissioners is a Company organ which has a key role in supervising the management policies and the management of the Company carried out by the Board of Directors. In addition to its supervisory function, the Board of Commissioners is also authorized to provide advice and guidance to the Board of Directors in the best interests of the Company, in accordance with the Company's articles of association.

The appointment of Board of Commissioners members is conducted through a General Meeting of Shareholders (GMS) following approval from the Financial Services Authority (OJK) through a fit and proper test process. Members of the Board of Commissioners may be dismissed at any time by the GMS in accordance with applicable regulations. The structure of the Board of Commissioners consists of the President Commissioner, Independent Commissioners, and Commissioners. Any proposal for the appointment and/or replacement of Board of Commissioners members submitted to the GMS is made with due consideration of the recommendations from the Nomination and Remuneration Committee.

Piagam Dewan Komisaris

Piagam Dewan Komisaris (*Board of Commissioners Charter/BOC Charter*) merupakan pedoman kerja dan tata tertib yang menjadi acuan Dewan Komisaris dalam melaksanakan tugas, tanggung jawab, dan kewenangannya. Piagam ini disusun dengan mengacu pada Anggaran Dasar Perseroan, peraturan perundang-undangan yang berlaku, serta praktik tata kelola perusahaan yang baik.

BOC *Charter* memuat ketentuan mengenai pelaksanaan fungsi pengawasan dan pemberian nasihat, termasuk pengaturan hubungan kerja antara Dewan Komisaris dan Direksi. Piagam Dewan Komisaris Perseroan terakhir diperbarui pada tahun 2023 dan dapat diakses oleh publik melalui situs web resmi Perseroan.

Board of Commissioners Charter

The Board of Commissioners Charter (BOC Charter) serves as a manual and code of conduct used as a reference by the Board of Commissioners in carrying out its duties, responsibilities, and authorities. This Charter is drafted in accordance with the Company's Articles of Association, applicable laws and regulations, and best corporate governance practices.

The BOC Charter contains provisions regarding the performance of supervisory and advisory functions, including the regulation of working relationships between the Board of Commissioners and the Board of Directors. The Company's Board of Commissioners Charter was last updated in 2023 and is accessible to the public via the Company's official website.

Jumlah dan Komposisi Dewan Komisaris

Sepanjang tahun 2025, tidak terdapat perubahan dalam komposisi maupun susunan Dewan Komisaris Perseroan.

Per 31 Desember 2025, Dewan Komisaris Perseroan terdiri dari 3 (tiga) orang, yang mencakup 1 (satu) Komisaris Utama Independen, 1 (satu) Komisaris Independen, dan 1 (satu) Komisaris. Seluruh anggota Dewan Komisaris merupakan profesional dengan latar belakang pendidikan, pengalaman kerja, serta keahlian yang beragam sesuai dengan bidang masing-masing.

Adapun susunan Dewan Komisaris Perseroan per 31 Desember 2025 adalah sebagai berikut:

Number and Composition of the Board of Commissioners

Throughout 2025, there were no changes in the composition or structure of the Company's Board of Commissioners.

As of December 31, 2025, the Company's Board of Commissioners consists of 3 (three) members, comprising 1 (one) Independent President Commissioner, 1 (one) Independent Commissioner, and 1 (one) Commissioner. All members of the Board of Commissioners are professionals with diverse educational backgrounds, work experience, and expertise in their respective fields.

The composition of the Company's Board of Commissioners as of December 31, 2025, is as follows:

Nama Name	Jabatan Position	Periode Jabatan Term of Office
Inkawan D. Jusi	Komisaris Utama Independen Independent President Commissioner	2023-2026
Kreisna Dewantara Gozali	Komisaris Commissioner	2024-2027
Pramoda Dei Sudarmo	Komisaris Independen Independent Commissioner	2024-2027

Komposisi Dewan Komisaris tersebut telah memenuhi ketentuan OJK mengenai Penerapan Tata Kelola bagi Bank Umum serta Peraturan Bank Indonesia tentang Pelaksanaan *Good Corporate Governance* bagi Bank Umum, yang mengatur bahwa jumlah anggota Dewan Komisaris paling sedikit 3 (tiga) orang dan paling banyak sama dengan jumlah anggota Direksi. Selain itu, ketentuan mengenai jumlah Komisaris Independen, yaitu paling sedikit 50% (lima puluh persen) dari total anggota Dewan Komisaris, juga telah dipenuhi.

Penetapan komposisi Dewan Komisaris dilakukan dengan mempertimbangkan kebutuhan, karakteristik, serta kompleksitas usaha Perseroan. Penentuan anggota Dewan Komisaris didasarkan pada kompetensi, pengalaman profesional, dan latar belakang keahlian masing-masing individu, tanpa membedakan jenis kelamin, suku, ras, maupun agama, guna mendukung efektivitas pelaksanaan fungsi pengawasan.

The composition of the Board of Commissioners complies with OJK regulation regarding the Implementation of Corporate Governance for Commercial Banks and Bank Indonesia regulation regarding the Implementation of Good Corporate Governance for Commercial Banks, which stipulate that the Board of Commissioners must consist of at least 3 (three) members and no more than the number of members of the Board of Directors. In addition, the requirement that at least 50% (fifty percent) of the total members of the Board of Commissioners be Independent Commissioners has also been met.

The composition of the Board of Commissioners is determined by considering the Company's needs, characteristics, and the complexity of its business operations. The selection of Board of Commissioners members is based on their competence, professional experience, and individual expertise, without discrimination based on gender, ethnicity, race, or religion, to support the effectiveness of the oversight function.

Program Pengenalan Perseroan bagi Komisaris Baru

Perseroan menyelenggarakan program pengenalan bagi setiap anggota Dewan Komisaris yang baru bergabung. Program ini bertujuan untuk memberikan pemahaman yang komprehensif mengenai Perseroan, termasuk profil perusahaan, kondisi terkini, kinerja usaha, serta ruang lingkup tugas dan tanggung jawab Dewan Komisaris.

Pelaksanaan program pengenalan dilakukan melalui serangkaian pertemuan, diskusi, dan penyampaian materi informasi yang relevan setiap kali terdapat penambahan anggota Dewan Komisaris. Pada tahun 2025, Perseroan tidak melakukan pelaksanaan program orientasi atau pengenalan bagi anggota Dewan Komisaris, mengingat tidak terdapat pengangkatan anggota Dewan Komisaris baru sepanjang tahun buku.

Company Orientation Program for New Commissioners

The Company conducts an orientation program for every new member of the Board of Commissioners. This program aims to provide a comprehensive understanding of the Company, including its corporate profile, current status, business performance, and the scope of duties and responsibilities of the Board of Commissioners.

The orientation program is conducted through a series of meetings, discussions, and the presentation of relevant informational materials whenever a new member joins the Board of Commissioners. In 2025, the Company did not conduct an orientation or introduction program for members of the Board of Commissioners, as no new members of the Board of Commissioners were appointed during the fiscal year.

Kepemilikan Saham Dewan Komisaris

Perseroan memiliki kebijakan yang mengatur kewajiban pengungkapan kepemilikan saham oleh anggota Dewan Komisaris. Setiap anggota Dewan Komisaris diwajibkan untuk melaporkan kepemilikan saham Perseroan paling lambat 3 (tiga) hari kerja sejak terjadinya kepemilikan saham tersebut.

Kebijakan ini telah diterapkan secara konsisten melalui mekanisme pelaporan yang efektif dan mengedepankan prinsip keterbukaan.

Share Ownership of the Board of Commissioners

The Company has a policy governing the disclosure obligations regarding shareholdings by members of the Board of Commissioners. Each member of the Board of Commissioners is required to report their shareholdings in the Company no later than 3 (three) business days from the date such shareholding occurs.

This policy has been consistently implemented through an effective reporting mechanism that prioritizes the principle of transparency.

Nama Name	**Kepemilikan Saham di** Ownership of Shares in the					
	Perseroan Company		**Bank Lain** Other Banks		**Lembaga Keuangan Bukan Bank** Non-Bank Financial Institutions	
	Lembar Share	**%**	**Lembar** Share	**%**	**Lembar** Share	**%**
Inkawan D. Jusi	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil
Kreisna Dewantara Gozali	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil
Pramoda Dei Sudarmo	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil	Nihil / Nil

Kepemilikan Saham Dewan Komisaris pada Perusahaan Lain

Sdr. Inkawan D. Jusi dan Sdr. Pramoda Dei Sudarmo tidak memiliki kepemilikan saham pada perusahaan lain. Sementara itu Sdr. Kreisna Dewantara Gozali tercatat memiliki 95% saham pada PT Gozco International Trading.

Share Ownership of the Board of Commissioners in Other Companies

Mr. Inkawan D. Jusi and Mr. Pramoda Dei Sudarmo have no share ownership in other companies. Meanwhile, Mr. Kreisna Dewantara Gozali owns 95% of the shares in PT Gozco International Trading.

Rangkap Jabatan Anggota Dewan Komisaris

Informasi mengenai anggota Dewan Komisaris yang memiliki rangkap jabatan, baik di lingkungan Perseroan maupun di perusahaan lain, disajikan sebagai berikut:

Concurrent Positions Held by Members of the Board of Commissioners

Information regarding members of the Board of Commissioners who hold concurrent positions, both within the Company and at other companies, is presented as follows:

Nama Name	**Jabatan di Perseroan** Position in the Company	**Jabatan di Perusahaan Lain** Position in Other Companies	**Perusahaan/ Badan Organisasi** Company/ Organization	**Bidang Usaha** Business Sector
Kreisna Dewantara Gozali	Komisaris Commissioner	Direktur Utama President Director	PT Gozco Plantations Tbk	Pertanian, Perdagangan, Perindustrian dan Jasa yang berkaitan dengan Agrobisnis dan Agroindustri Agriculture, Trade, Industry, and Services related to Agribusiness and Agroindustry

Tugas dan Tanggung Jawab Dewan Komisaris

Berdasarkan Pedoman dan Tata Tertib Dewan Komisaris, tugas dan tanggung jawab Dewan Komisaris meliputi hal-hal sebagai berikut:

1. Dewan Komisaris tidak dapat bertindak sendiri, melainkan berdasarkan keputusan Dewan Komisaris
2. Dewan Komisaris wajib memastikan terselenggaranya pelaksanaan *Good Corporate Governance* dalam setiap kegiatan usaha Bank pada seluruh tingkatan atau jenjang organisasi paling kurang melalui:
   a. Pelaksanaan tugas dan tanggung jawab Direksi, serta memberikan nasihat kepada Direksi.
   b. Pengawasan atas kelengkapan dan pelaksanaan tugas komite-komite dan satuan kerja yang menjalankan fungsi pengendalian intern Bank.
   c. Pengawasan terhadap penerapan fungsi kepatuhan, auditor internal dan auditor eksternal.
   d. Pengawasan terhadap penerapan manajemen risiko, termasuk sistem pengendalian internal.
   e. Penyediaan dana kepada pihak terkait sebagaimana diatur dalam ketentuan Otoritas Jasa Keuangan (OJK) tentang Batas Maksimum Pemberian Kredit Bank Umum.
   f. Mengawasi, mengarahkan, memantau, dan mengevaluasi pelaksanaan kebijakan strategis Bank/ Rencana Bisnis sesuai regulasi.

Duties and Responsibilities of the Board of Commissioners

Based on the Board of Commissioners Charter, the duties and responsibilities of the Board of Commissioners are as follows:

1. The Board of Commissioners cannot act independently, but only based on the decisions of the Board of Commissioners.
2. The Board of Commissioners must ensure the implementation of Good Corporate Governance (GCG) in all business activities of the Bank at every level of the organization, at a minimum, through:
   a. The implementation of the duties and responsibilities of the Board of Directors, and providing advice to the Board of Directors.
   b. Supervision of the completeness and implementation of the duties of committees and work units that carry out the Bank's internal control functions.
   c. Supervision over the implementation of the compliance function, internal auditors, and external auditors.
   d. Supervision of the implementation of risk management, including the internal control system.
   e. Provision of funds to related parties as regulated in the Financial Services Authority (OJK) regulations regarding the Maximum Lending Limit for Commercial Banks.
   f. Supervising, directing, monitoring, and evaluating the implementation of the Bank's strategic policies/Business Plan in accordance with regulations.

g. Menyetujui dan mereview secara berkala visi, misi dan nilai-nilai utama Bank.

3. Melakukan pengawasan atas tugas, wewenang dan tanggung jawab sesuai dengan ketentuan anggaran dasar Perseroan dan keputusan RUPS.
4. Memastikan bahwa Direksi telah menindaklanjuti temuan audit dan rekomendasi dari satuan kerja audit intern Bank, auditor eksternal, hasil pengawasan OJK dan/atau hasil pengawasan badan otoritas lainnya.
5. Pengambilan keputusan oleh Dewan Komisaris tidak meniadakan tanggung jawab Direksi atas pelaksanaan kepengurusan Bank.
6. Dewan Komisaris wajib melaksanakan tugas dan tanggung jawab secara independen dan dengan itikad baik, penuh tanggung jawab, serta kehati-hatian.
7. Dewan Komisaris wajib menyediakan waktu yang cukup untuk melaksanakan tugas dan tanggungjawabnya secara optimal.
8. Dewan Komisaris wajib memberitahukan kepada OJK paling lambat 7 (tujuh) hari kerja sejak ditemukannya:
   a. pelanggaran peraturan perundang-undangan di bidang keuangan dan perbankan; dan
   b. keadaan atau perkiraan keadaan yang dapat membahayakan kelangsungan usaha Bank.
9. Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawab, Dewan Komisaris wajib membentuk paling sedikit:
   a. Komite Audit
   b. Komite Pemantau Risiko
   c. Komite Remunerasi dan Nominasi
   d. Komite Lainnya jika yang diwajibkan oleh peraturan perundang-undangan
10. Dewan Komisaris wajib melakukan pengawasan terhadap Komite yang telah dibentuk sebagaimana dimaksud pada poin 9 menjalankan tugasnya secara efektif, dan wajib melakukan evaluasi dan/atau penilaian terhadap kinerja komite dimaksud sekurang-kurangnya pada setiap akhir tahun buku.
11. Dewan Komisaris wajib melakukan pengawasan aktif terhadap fungsi kepatuhan dengan:
    a. Mengevaluasi pelaksanaan fungsi kepatuhan Bank paling kurang 2 (dua) kali dalam satu tahun.
    b. Memberikan saran-saran dalam rangka meningkatkan kualitas pelaksanaan fungsi kepatuhan Bank.

g. Approve and review periodically the vision, mission, and core values of the Bank.

3. Conduct supervision over the duties, authority, and responsibilities in accordance with the Articles of Association and resolutions of the General Meeting of Shareholders (GMS).
4. Ensure that the Board of Directors has followed up on audit findings and recommendations from the Bank's Internal Audit Function, external auditors, supervisory results of OJK and/or other regulators.
5. Decisions made by the Board of Commissioners do not absolve the Board of Directors from responsibility for the management of the Bank.
6. The Board of Commissioners must carry out its duties and responsibilities independently and with good faith, full responsibility, and caution.
7. The Board of Commissioners must allocate sufficient time to optimally carry out its duties and responsibilities.
8. The Board of Commissioners must notify OJK within 7 (seven) business days of the discovery of:
   a. Violations of financial and banking regulations; and
   b. Circumstances or potential situations that could endanger the Bank's business continuity.
9. In order to support of the effective execution of duties and responsibilities, the Board of Commissioners must establish at least the following committees:
   a. Audit Committee
   b. Risk Oversight Committee
   c. Remuneration and Nomination Committee
   d. Other committees required by regulations
10. The Board of Commissioners must supervise the committees mentioned in point 9 to ensure they carry out their tasks effectively and must evaluate and/or assess the performance of these committees at least at the end of each fiscal year.
11. The Board of Commissioners must actively supervise the Compliance Function by:
    a. Evaluating the implementation of the Bank's compliance function at least twice a year.
    b. Providing recommendations to improve the quality of the Bank's compliance function.

12. Berdasarkan poin 11 tersebut, Dewan Komisaris menyampaikan saran-saran dalam rangka peningkatan kualitas pelaksanaan Fungsi Kepatuhan kepada Direktur Utama.
13. Dewan Komisaris bertanggung-jawab untuk memastikan penerapan Manajemen Risiko sesuai dengan karakteristik, kompleksitas dan profil risiko Bank dengan:
    a. Menyetujui kebijakan manajemen risiko termasuk strategi dan kerangka manajemen risiko yang ditetapkan sesuai dengan tingkat risiko yang akan diambil (*risk appetite*) dan toleransi risiko (*risk tolerance*) Bank.
    b. Mengevaluasi kebijakan manajemen risiko dan strategi manajemen risiko paling kurang satu kali dalam satu tahun atau dalam frekuensi yang lebih sering dalam hal terdapat perubahan faktor-faktor yang mempengaruhi kegiatan usaha Bank secara signifikan.
14. Dalam pelaksanaan fungsi audit intern, Dewan Komisaris bertanggung jawab:
    a. Memastikan Direksi menyusun dan memelihara sistem pengendalian intern yang memadai, efektif, dan efisien.
    b. Mengkaji efektivitas dan efisiensi sistem pengendalian intern berdasarkan informasi yang diperoleh dari Satuan Kerja Audit Intern (SKAI) Bank paling sedikit sekali dalam 1 (satu) tahun.
    c. Menunjuk pengendali mutu independen dari pihak ekstern untuk melakukan kaji ulang terhadap kinerja SKAI, dengan mempertimbangkan rekomendasi Komite Audit.

Wewenang Dewan Komisaris

Dalam menjalankan tugasnya, Dewan Komisaris memiliki wewenang sebagai berikut:
1. Dewan Komisaris tidak dapat bertindak sendiri, melainkan berdasarkan keputusan Dewan Komisaris;
2. Dewan Komisaris berwenang untuk:
    a. Melaksanakan tugas dan tanggung jawab secara independen.
    b. Meminta keterangan/penjelasan dari Direksi dan/atau pejabat lainnya mengenai segala persoalan yang menyangkut pengelolaan Perseroan.
    c. Memasuki bangunan-bangunan dan halaman atau tempat-tempat lain yang dipergunakan atau dikuasai oleh Perseroan.

12. Based on point 11, the Board of Commissioners provides suggestions to improve the quality of the implementation of the compliance function to the President Director.
13. The Board of Commissioners is responsible for ensuring the implementation of risk management in line with the Bank's characteristics, complexity, and risk profile by:
    a. Approving the risk management policies, including the strategy and risk management framework set according to the level of risk the Bank is willing to take (risk appetite) and risk tolerance.
    b. Evaluating the risk management policies and strategies at least once a year or more frequently if there are significant changes in the factors affecting the Bank's business activities.
14. In the implementation of the internal audit function, the Board of Commissioners is responsible for:
    a. Ensuring that the Board of Directors develops and maintains an adequate, effective, and efficient internal control system.
    b. Reviewing the effectiveness and efficiency of the internal control system based on information obtained from the Bank's Internal Audit Unit (SKAI) at least once a year.
    c. Appointing an independent quality control from an external party to review the performance of SKAI, taking into account the recommendations of the Audit Committee.

Authorities of the Board of Commissioners

In carrying out its duties, the Board of Commissioners has the following authorities:
1. The Board of Commissioners cannot act Independently, but only based on decisions made by the Board of Commissioners.
2. The Board of Commissioners has the authority to:
    a. Carry out duties and responsibilities independently.
    b. b. Request information/explanation from the Board of Directors and/or other officials regarding any matters related to the management of the Company.
    c. Enter buildings, premises, or other places used or owned by the Company.

d. Mengetahui segala kebijakan dan tindakan telah dan akan dijalankan oleh Direksi Bank.

e. Meminta Direksi dan/atau pejabat lainnya dibawah Direksi dengan sepengetahuan Direksi untuk menghadiri Rapat Dewan Komisaris.
f. Memberhentikan sementara anggota Direksi sesuai dengan ketentuan Anggaran Dasar.
g. Melakukan tindakan pengurus Bank dalam keadaan tertentu untuk jangka waktu tertentu sesuai dengan ketentuan Anggaran Dasar Bank.
h. Dewan Komisaris untuk sementara dapat mengurus Bank apabila oleh suatu sebab apapun semua jabatan Anggota Direksi kosong, dan selambat-lambatnya 90 (sembilan puluh) hari kalender sejak terjadinya kekosongan tersebut harus diselenggarakan RUPS untuk mengangkat Direksi baru.
i. Menghadiri Rapat Dewan Komisaris dan memberikan pandangan-pandangan terhadap hal-hal yang dibicarakan.
j. Memberikan saran, opini, dan *advice* dapat melalui Surat Dewan Komisaris yang ditandatangani oleh Komisaris Utama bersama minimal 1 (satu) orang Komisaris Independen atau bersama Komisaris lainnya yang diminta tandatangannya oleh Komisaris Utama. Surat Dewan Komisaris tersebut dapat disampaikan melalu *hardcopy* atau media elektronik lainnya.
k. Melaksanakan kewenangan pengawasan lainnya sepanjang tidak bertentangan dengan peraturan perundang-undangan, Anggaran Dasar dan/atau keputusan RUPS.

3. Dalam kondisi tertentu, Dewan Komisaris wajib menyelenggarakan RUPS tahunan dan RUPS lainnya sesuai dengan kewenangannya sebagaimana diatur dalam peraturan perundang-undangan dan Anggaran Dasar.

4. Dewan Komisaris berwenang meminta penjelasan dari Direksi tentang segala hal mengenai Bank apabila diperlukan.

5. Dewan Komisaris dapat melakukan tindakan pengurusan Bank dalam keadaan tertentu dan untuk jangka waktu tertentu. Dalam hal demikian berlaku semua ketentuan mengenai hak, wewenang, dan kewajiban Direksi terhadap Bank dan pihak ketiga.

d. Know all policies and actions that have been and will be implemented by the Bank's Board of Directors.
e. Request the Board of Directors and/or other officials under the Board of Directors, with the knowledge of the Board of Directors, to attend Board of Commissioners' meetings.
f. Temporarily suspend members of the Board of Directors according to the Articles of Association.
g. Take action on the management of the Bank in certain circumstances for a specific period as stipulated in the Bank's Articles of Association.
h. The Board of Commissioners may temporarily manage the Bank if, for any reason, all positions of the Board of Directors are vacant, and no later than 90 (ninety) calendar days after the vacancy, an Annual General Meeting of Shareholders (AGMS) must be held to appoint a new Board of Directors.
i. Attend Board of Commissioners' meetings and provide opinions on the discussed subjects.
j. Provide suggestions, opinions, and advice through a Board of Commissioner's letter signed by the President Commissioner together with at least one (1) Independent Commissioner or another Commissioner as requested by the President Commissioner. The Board of Commissioners' letter may be delivered via hardcopy or other electronic media.
k. Carry out other supervisory powers as long as they do not conflict with regulations, the Articles of Association, and/or decisions made at the GMS.

3. In certain conditions, the Board of Commissioners is required to hold the Annual General Meeting of Shareholders (AGMS) and other General Meetings of Shareholders as per its authority, as outlined in the regulations and Articles of Association.
4. The Board of Commissioners has the authority to request explanations from the Board of Directors regarding any matters concerning the Bank, if necessary.
5. The Board of Commissioners may carry out management actions in certain situations and for a specific period. In such cases, all provisions regarding the rights, authority, and obligations of the Board of Directors toward the Bank and third parties are applicable.

Mekanisme Pelaksanaan Tugas Pengawasan Dewan Komisaris

Dalam menjalankan tugas dan tanggung jawab pengawasan, Dewan Komisaris menerapkan mekanisme kerja yang terstruktur dan berkesinambungan melalui beberapa sarana utama, yaitu:

1. Pelaksanaan tugas pengawasan Dewan Komisaris dilakukan melalui kegiatan berkantor untuk menelaah dan mengevaluasi surat, laporan, serta dokumen keuangan Bank, melakukan kunjungan pengawasan, melalui penyelenggaraan rapat, serta dengan dukungan dan peran aktif komite-komite di bawah Dewan Komisaris.
2. Dalam mendukung pelaksanaan tugas dan tanggung jawabnya, Dewan Komisaris difasilitasi dengan ruang kantor yang digunakan untuk melaksanakan kegiatan kerja dan pengawasan.
3. Kunjungan Dewan Komisaris dalam rangka pelaksanaan fungsi pengawasan dilakukan secara terencana dengan dukungan anggaran yang memadai.
4. Administrasi surat menyurat Dewan Komisaris mencakup pengelolaan surat masuk untuk memperoleh disposisi Komisaris Utama, penandatanganan surat keluar oleh Komisaris Utama dan apabila diperlukan bersama komisaris lainnya, penandatanganan keputusan kebijakan oleh Komisaris Utama dan seluruh Komisaris Independen, serta penandatanganan notulen rapat oleh seluruh anggota Dewan Komisaris.

Pelaksanaan Tugas Dewan Komisaris Tahun 2025

Sepanjang tahun 2025, Dewan Komisaris secara konsisten melaksanakan fungsi pengawasan guna memastikan penerapan prinsip-prinsip *Good Corporate Governance* (GCG) di seluruh aktivitas usaha Perseroan. Pengawasan dilakukan terhadap kebijakan pengurusan, pelaksanaan pengelolaan Perseroan secara umum, serta pemberian nasihat strategis kepada Direksi.

Dewan Komisaris juga memantau efektivitas penerapan GCG, manajemen risiko, program anti pencucian uang dan pencegahan pendanaan terorisme, serta berbagai langkah lain yang diperlukan untuk memastikan pengelolaan Bank berjalan sesuai dengan prinsip kehati-hatian.

Board of Commissioners Supervisory Mechanism

In carrying out its supervisory duties and responsibilities, the Board of Commissioners implements a structured and continuous work mechanism through the following measures:

1. The Board of Commissioners performs its supervisory duties through office-based activities to review and evaluate the Bank's letters, reports, and financial documents, conduct supervisory visits, hold meetings, and with the support and active role of committees under the Board of Commissioners.
2. To support the performance of its duties and responsibilities, the Board of Commissioners is facilitated with office space to work and carry out its supervisory activities.
3. Supervisory visits by the Board of Commissioners are conducted according to a plan and with adequate financial support.
4. The Board of Commissioners' correspondence administration includes managing incoming correspondence to obtain disposition from the President Commissioner, signing outgoing correspondence by the President Commissioner and, if necessary, together with other commissioners, signing policy decisions by the President Commissioner and all Independent Commissioners, as well as signing meeting minutes by all members of the Board of Commissioners.

Implementation of the Board of Commissioners Duties in 2025

Throughout 2025, the Board of Commissioners consistently carried out its supervisory functions to ensure the implementation of Good Corporate Governance (GCG) principles across all of the Company's business activities. The supervision covered management policies, the general administration of the Company, and the provision of strategic advice to the Board of Directors.

The Board of Commissioners also monitored the effectiveness of GCG implementation, risk management, anti-money laundering and counter-terrorism financing programs, as well as various other measures necessary to ensure the Bank's management operates in accordance with the principle of prudence.

Fokus utama pengawasan Dewan Komisaris selama tahun 2025 mencakup antara lain:

1. Melakukan penelaahan serta memberikan persetujuan atas Rencana Bisnis Bank (RBB) tahun 2025–2027 dan Rencana Aksi Keuangan Berkelanjutan (RAKB) tahun 2025–2029.
2. Memastikan tindak lanjut Direksi atas seluruh temuan audit dan rekomendasi dari Satuan Kerja Audit Intern, termasuk perbaikan atas hasil pemeriksaan auditor eksternal, internal, maupun regulator.
3. Melakukan evaluasi berkala terhadap kinerja keuangan Bank.
4. Mendukung efektivitas pelaksanaan tugas Dewan Komisaris melalui penerimaan laporan rutin dari Komite Audit, Komite Pemantau Risiko, serta Komite Nominasi dan Remunerasi dalam setiap Rapat Dewan Komisaris.
5. Memantau konsistensi dan efektivitas penerapan tata kelola perusahaan yang baik di lingkungan Perseroan.
6. Menyusun pembagian tugas anggota Dewan Komisaris berdasarkan kompetensi dan pengalaman masing-masing.
7. Melakukan pengawasan atas pengurusan Perseroan, termasuk pelaksanaan Rencana Bisnis Bank, serta melakukan penilaian terhadap kinerja Direksi.

Landasan Hukum Pelaksanaan Tugas

Dalam menjalankan fungsi dan tanggung jawabnya, Dewan Komisaris berpedoman pada berbagai ketentuan dan regulasi yang berlaku, antara lain:

1. Undang-Undang Nomor 40 Tahun 2007 tentang Perseroan Terbatas.
2. Undang-Undang Nomor 7 Tahun 1992 tentang Perbankan sebagaimana telah diubah dengan Undang-Undang Nomor 10 Tahun 1998.
3. POJK Nomor 33/POJK.04/2014 tentang Direksi dan Dewan Komisaris Emiten atau Perusahaan Publik.
4. POJK Nomor 55/POJK.04/2015 tentang Pembentukan dan Pedoman Pelaksanaan Kerja Komite Audit.
5. POJK Nomor 45/POJK.03/2015 tentang Penerapan Tata Kelola dalam Pemberian Remunerasi bagi Bank Umum.
6. POJK Nomor 12/POJK.03/2021 tentang Bank Umum.
7. POJK Nomor 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum.
8. SEOJK Nomor 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum.

The Board of Commissioners' main focus of supervision during 2025 includes:

1. Reviewing and approving the Bank's Business Plan (RBB) for 2025–2027 and the Sustainable Finance Action Plan (RAKB) for 2025–2029.
2. Ensuring that the Board of Directors follows up on all audit findings and recommendations from the Internal Audit Unit, including corrective actions regarding the results of examinations by external, internal, and regulatory auditors.
3. Conduct periodic evaluations of the Bank's financial performance.
4. Support the effectiveness of the Board of Commissioners' duties by receiving regular reports from the Audit Committee, the Risk Oversight Committee, and the Nomination and Remuneration Committee at every Board of Commissioners meeting.
5. Monitoring the consistency and effectiveness of the implementation of good corporate governance within the Company.
6. Establishing the assignment of duties among Board of Commissioners members based on their respective competencies and experience.
7. Overseeing the management of the Company, including the implementation of the Bank's Business Plan, and evaluating the performance of the Board of Directors.

Legal Basis of Duty Performance

In carrying out its functions and responsibilities, the Board of Commissioners adheres to various applicable provisions and regulations, including:

1. Law No. 40 of 2007 concerning Limited Liability Companies.
2. Law No. 7 of 1992 concerning Banking as amended by Law No. 10 of 1998.
3. POJK Number 33/POJK.04/2014 concerning the Board of Directors and Board of Commissioners of Issuers or Public Companies.
4. POJK Number 55/POJK.04/2015 concerning the Establishment and Guidelines for the Operation of the Audit Committee.
5. POJK No. 45/POJK.03/2015 on the Implementation of Governance in the Provision of Remuneration for Commercial Banks.
6. POJK No. 12/POJK.03/2021 on Commercial Banks.
7. POJK No. 17 of 2023 on the Implementation of Governance for Commercial Banks.
8. SEOJK No. 13/SEOJK.03/2017 on the Implementation of Corporate Governance for Commercial Banks.

9. POJK Nomor 27/POJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan bagi Pihak Utama Lembaga Jasa Keuangan.
10. SEOJK Nomor 39/SEOJK.03/2016 tentang Penilaian Kemampuan dan Kepatutan bagi Calon Pemegang Saham Pengendali, Calon Anggota Direksi, dan Calon Anggota Dewan Komisaris Bank.
11. POJK Nomor 46/POJK.03/2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum.
12. POJK Nomor 18/POJK.03/2016 tentang Manajemen Risiko bagi Bank Umum.
13. Anggaran Dasar PT Bank Neo Commerce Tbk.
14. Ketentuan peraturan perundang-undangan terkait lainnya.

Independensi Dewan Komisaris

Komposisi Dewan Komisaris Perseroan terdiri dari 3 (tiga) anggota, dengan 2 (dua) di antaranya merupakan Komisaris Independen atau sebesar 66,67% dari total anggota Dewan Komisaris.

Seluruh Komisaris Independen tidak memiliki hubungan keluarga hingga derajat kedua, baik dengan sesama anggota Dewan Komisaris dan/atau Direksi, maupun dengan Pemegang Saham Pengendali. Komisaris Independen yang telah menjabat selama 2 (dua) periode masa jabatan dapat diangkat kembali pada periode selanjutnya sepanjang Komisaris Independen tersebut menyatakan dirinya tetap independen kepada RUPS dan memenuhi persyaratan lainnya sebagaimana diatur dalam Peraturan OJK.

Rapat Dewan Komisaris

Mengacu pada Piagam Dewan Komisaris, penyelenggaraan Rapat Dewan Komisaris dilaksanakan dengan ketentuan sebagai berikut:
1. Rapat Dewan Komisaris wajib diadakan secara berkala paling kurang 1 (satu) kali dalam 2 (dua) bulan, atau setiap waktu jika dianggap perlu.
2. Rapat dapat dilakukan antara lain dengan cara tatap muka atau dengan menggunakan teknologi telekonferensi.
3. Dewan Komisaris harus menjadwalkan rapat untuk tahun berikutnya sebelum berakhirnya tahun buku.
4. Dewan Komisaris wajib mengadakan rapat bersama Direksi secara berkala paling kurang 1 (satu) kali dalam 4 (empat) bulan.

9. POJK No. 27/POJK.03/2016 on the Assessment of Competence and Suitability for Key Personnel of Financial Services Institutions.
10. SEOJK No. 39/SEOJK.03/2016 concerning the Assessment of Competence and Suitability for Prospective Controlling Shareholders, Prospective Members of the Board of Directors, and Prospective Members of the Board of Commissioners of Banks.
11. POJK No. 46/POJK.03/2017 regarding the Implementation of Compliance Functions in Commercial Banks.
12. POJK No. 18/POJK.03/2016 regarding Risk Management for Commercial Banks.
13. Articles of Association of PT Bank Neo Commerce Tbk.
14. Other relevant laws and regulations.

Independency of the Board of Commissioners

The Company's Board of Commissioners consists of 3 (three) members, 2 (two) of whom are Independent Commissioners, representing 66.67% of the total members of the Board of Commissioners.

All Independent Commissioners have no family relationship up to the second degree, either with fellow members of the Board of Commissioners and/or the Board of Directors, or with the Controlling Shareholder. An Independent Commissioner who has served for 2 (two) terms may be reappointed for the subsequent term provided that the Independent Commissioner declares their continued independence to the General Meeting of Shareholders and meets other requirements as stipulated in OJK Regulations.

Board of Commissioners Meetings

Pursuant to the Board of Commissioners Charter, the Board of Commissioners meetings shall be held in accordance with the following provisions:
1. Board of Commissioners meetings must be held periodically at least once every 2 (two) months, or at any time deemed necessary.
2. Meetings may be held in person or via teleconference.
3. The Board of Commissioners must schedule meetings for the following year before the end of the fiscal year.
4. The Board of Commissioners must hold joint meetings with the Board of Directors at least once every four months.

5. Ketentuan jalannya Rapat Dewan Komisaris

   a. Rapat Dewan Komisaris dipimpin oleh Komisaris Utama, dalam hal berhalangan, oleh Komisaris lain yang ditunjuk di dalam rapat tersebut.

   b. Rapat Dewan Komisaris dapat dilangsungkan apabila dihadiri mayoritas dari seluruh anggota Dewan Komisaris.
   c. Minimal 2 (dua) kali dalam setahun, Rapat harus dihadiri secara fisik oleh seluruh anggota Dewan Komisaris.
   d. Dalam hal Komisaris Non Independen tidak dapat menghadiri rapat Dewan Komisaris secara fisik, maka dapat menghadiri rapat Dewan Komisaris melalui sarana teknologi telekonferensi.
   e. Pada rapat yang telah dijadwalkan, bahan Rapat Dewan Komisaris disampaikan kepada peserta rapat paling lambat 5 (lima) hari kerja sebelum rapat dilakukan.

   f. Dalam hal terdapat rapat yang diselenggarakan di luar jadwal yang telah disusun, bahan rapat disampaikan kepada peserta rapat paling lambat sebelum rapat diselenggarakan.
   g. Undangan Rapat harus mencantumkan informasi mengenai tanggal, waktu, tempat, serta agenda Rapat.
   h. Keputusan Rapat diambil berdasarkan musyawarah untuk mufakat. Dalam hal keputusan berdasarkan musyawarah untuk mufakat tidak tercapai, maka keputusan diambil dengan pemungutan suara berdasarkan suara terbanyak.
   i. Risalah Rapat dibuat oleh Sekretaris Perusahaan atau pihak lain yang ditunjuk oleh Dewan Komisaris dan didokumentasikan dengan baik.
   j. Dalam hal Rapat dilakukan melalui teknologi telekonferensi, maka wajib ditindaklanjuti dengan pembuatan Risalah Rapat yang ditandatangani oleh seluruh anggota Dewan Komisaris yang hadir.
   k. Risalah Rapat harus ditandatangani oleh semua anggota Dewan Komisaris yang hadir dalam Rapat dan dikirimkan kepada seluruh anggota Dewan Komisaris.
   l. Dalam hal terdapat anggota Dewan Komisaris yang tidak menandatangani Risalah Rapat, yang bersangkutan wajib menyebutkan alasannya secara tertulis dalam surat tersendiri yang dilekatkan pada Risalah Rapat.

5. Provisions regarding the conduct of Board of Commissioners meetings

   a. Board of Commissioners meetings shall be chaired by the President Commissioner; however, if the President Commissioner is unable to attend, the meeting shall be chaired by another Commissioner designated during the meeting.
   b. A Board of Commissioners meeting may be held if attended by a majority of all members of the Board of Commissioners.
   c. At least twice a year, the meeting must be physically attended by all members of the Board of Commissioners.
   d. In the event that a Non-Independent Commissioner is unable to physically attend a Board of Commissioners meeting, they may attend the meeting via teleconference.

   e. For scheduled meetings, the materials for the Board of Commissioners meeting must be distributed to the meeting participants no later than 5 (five) business days before the meeting is held.
   f. In the event of a meeting held outside the established schedule, the meeting materials must be distributed to the meeting participants no later than before the meeting is held.
   g. Meeting invitations must include information regarding the date, time, location, and agenda of the meeting.
   h. Meeting decisions are made by consensus. If a decision by consensus cannot be reached, the decision is made by a majority vote.

   i. Meeting minutes shall be prepared by the Corporate Secretary or another party appointed by the Board of Commissioners and properly documented.
   j. In the event that a meeting is conducted via teleconference technology, the meeting must be followed up with the preparation of meeting minutes signed by all members of the Board of Commissioners in attendance.
   k. The Meeting Minutes must be signed by all members of the Board of Commissioners present at the Meeting and distributed to all members of the Board of Commissioners.
   l. In the event that a member of the Board of Commissioners does not sign the Meeting Minutes, the member in question must state the reason in writing in a separate letter attached to the Meeting Minutes.

m. Apabila terdapat perbedaan pendapat (*dissenting opinions*) yang terjadi dalam Rapat wajib dicantumkan secara jelas dalam Risalah Rapat beserta alasan perbedaan pendapat tersebut.
n. Dewan Komisaris dapat juga mengambil keputusan yang sah tanpa mengadakan Rapat, dengan ketentuan bahwa semua anggota Dewan Komisaris yang sedang menjabat memberikan persetujuan dengan menandatangani usul keputusan tersebut. Keputusan yang diambil dengan cara demikian mempunyai kekuatan yang sama dengan keputusan yang diambil dengan sah dalam Rapat.

m. If there are dissenting opinions arising during the Meeting, they must be clearly recorded in the Meeting Minutes along with the reasons for such dissenting opinions.
n. The Board of Commissioners may also make valid decisions without holding a Meeting, provided that all serving members of the Board of Commissioners give their approval by signing the proposed decision. Decisions made in this manner have the same legal force as decisions validly adopted during a meeting.

Sepanjang tahun 2025, Dewan Komisaris telah menyelenggarakan 6 (enam) kali Rapat Dewan Komisaris dengan rincian sebagai berikut:

Throughout 2025, the Board of Commissioners has held 6 (six) meetings with the following details:

Nama Name	**Jabatan** Position	**Rapat Dewan Komisaris** Board of Commissioners Meeting		
		Jumlah Rapat Total Meeting	**Jumlah Kehadiran** Total Attendance	**Kehadiran %** Attendance %
Inkawan D. Jusi	Komisaris Utama Independen Independent President Commissioner	6	6	100,00
Kreisna Dewantara Gozali	Komisaris Commissioner	6	6	100,00
Pramoda Dei Sudarmo	Komisaris Independen Independent Commissioner	6	6	100,00

Hubungan Dewan Komisaris dan Direksi

Dalam pelaksanaan tugas dan tanggung jawabnya, Dewan Komisaris dan Direksi memiliki peran yang berbeda namun saling melengkapi. Dewan Komisaris berperan sebagai organ pengawas dan pemberi nasihat, sedangkan Direksi bertanggung jawab atas pelaksanaan keputusan RUPS, pelaksanaan arahan Dewan Komisaris, serta pengelolaan operasional Perseroan sehari-hari.

Perbedaan peran tersebut tidak mengurangi pentingnya koordinasi dan kerja sama antara Dewan Komisaris dan Direksi dalam mencapai tujuan Perseroan serta menjaga kesinambungan usaha jangka panjang. Hubungan kerja keduanya dilandasi mekanisme *check and balances* yang diarahkan untuk menjaga kesehatan dan pertumbuhan Perseroan.

Relationship Between the Board of Commissioners and the Board of Directors

In carrying out their duties and responsibilities, the Board of Commissioners and the Board of Directors have distinct yet complementary roles. The Board of Commissioners serves as a supervisory and advisory body, while the Board of Directors is responsible for the implementation of GMS resolutions, the execution of the Board of Commissioners' directives, and the management of the Company's day-to-day operations.

These differing roles are not intended to diminish the importance of coordination and cooperation between the Board of Commissioners and the Board of Directors in achieving the Company's objectives and ensuring long-term business continuity. Their working relationship is based on a system of check and balances designed to safeguard the Company's health and growth.

Dewan Komisaris dan Direksi sama-sama bertanggung jawab atas keberlanjutan usaha Perseroan dalam jangka panjang, yang tercermin pada aspek-aspek berikut:

1. Terjaganya tingkat kesehatan Perseroan sesuai prinsip kehati-hatian serta kriteria yang ditetapkan oleh Otoritas Jasa Keuangan (OJK)/ Bank Indonesia.
2. Berjalannya penerapan manajemen risiko dan sistem pengendalian internal secara efektif.
3. Tercapainya tingkat imbal hasil yang wajar bagi pemegang saham.
4. Terlindunginya kepentingan para pemangku kepentingan secara proporsional.
5. Terimplementasikannya prinsip Tata Kelola Perusahaan yang Baik.
6. Terlaksananya proses suksesi kepemimpinan serta kesinambungan manajemen di seluruh lini organisasi.

Untuk mendukung pelaksanaan tanggung jawab dan menjaga keseimbangan peran tersebut, Dewan Komisaris dan Direksi secara bersama-sama merumuskan dan menetapkan hal-hal sebagai berikut:

1. Visi, misi, dan nilai-nilai perusahaan (*Corporate Values*).
2. Sasaran usaha, strategi bisnis, rencana jangka panjang, serta rencana bisnis tahunan Perseroan.
3. Kebijakan pemenuhan ketentuan peraturan perundang-undangan, Anggaran Dasar, dan *prudential banking practices*, termasuk komitmen untuk menghindari benturan kepentingan.
4. Kebijakan serta metode penilaian kinerja Perseroan, unit kerja, dan sumber daya manusia.
5. Struktur organisasi pada tingkat eksekutif yang mampu mendukung pencapaian sasaran bisnis Perseroan.

The Board of Commissioners and the Board of Directors are jointly responsible for the Company's long-term business sustainability, as reflected in the following aspects:

1. Maintenance of the Company's health in accordance with the principle of prudence and criteria established by the Financial Services Authority (OJK)/Bank Indonesia.
2. Effective implementation of risk management and internal control systems.
3. Achieving a reasonable rate of return for shareholders.
4. Protecting the interests of stakeholders in a proportionate manner.
5. Implementing the principles of Good Corporate Governance.
6. Ensuring the implementation of leadership succession processes and management continuity across all organizational levels.

To support the fulfillment of these responsibilities and maintain the balance of these roles, the Board of Commissioners and the Board of Directors jointly formulate and establish the following:

1. The Company's vision, mission, and Corporate values.
2. The Company's business objectives, business strategies, long-term plans, and annual business plans.
3. Policies regarding compliance with laws and regulations, the Articles of Association, and prudential banking practices, including a commitment to avoiding conflicts of interest.
4. Policies and methods for evaluating the performance of the Company, its business units, and human resources.
5. An executive-level organizational structure capable of supporting the achievement of the Company's business objectives.

Rapat Dewan Komisaris dan Direksi

Sepanjang tahun 2025, Dewan Komisaris telah menyelenggarakan 7 (tujuh) kali rapat gabungan bersama Direksi sebagai bagian dari penguatan koordinasi dan efektivitas pengawasan, dengan rincian sebagai berikut:

Meetings of the Board of Commissioners and the Board of Directors

Throughout 2025, the Board of Commissioners held 7 (seven) joint meetings with the Board of Directors as an effort to enhance coordination and the effectiveness of oversight, with the following details:

Nama Name	**Jabatan** Position	**Rapat Gabungan Dewan Komisaris dan Direksi** Joint Meeting of the Board of Commissioners and Board of Directors		
		Jumlah Rapat Total Meeting	**Jumlah Kehadiran** Total Attendance	**Kehadiran %** Attendance %
Inkawan D. Jusi	Komisaris Utama Independen Independent President Commissioner	7	6	85,71
Kreisna Dewantara Gozali	Komisaris Commissioner	7	7	100,00
Pramoda Dei Sudarmo	Komisaris Independen Independent Commissioner	7	6	85,71
Eri Budiono	Direktur Utama President Director	7	7	100,00
Aditya Wahyu Windarwo	Direktur Bisnis Business Director	7	7	100,00
Ricko Irwanto	Direktur Kepatuhan Compliance Director	7	7	100,00

Rekomendasi Dewan Komisaris

Sepanjang tahun 2025, Dewan Komisaris secara aktif memberikan berbagai rekomendasi strategis kepada Direksi dalam rangka memperkuat pengelolaan Perseroan, yang meliputi antara lain:

1. Menetapkan pemantauan target berdasarkan *Balanced Scorecard* sebagai alat komunikasi strategi, alat penyelarasan tujuan dengan target, dan sebagai alat untuk meninjau kinerja.
2. Meningkatkan kualitas kredit yang diberikan, sehingga dapat meningkatkan pendapatan Perseroan dan menjaga *Non Performing Loan* (NPL) pada tingkatan yang sesuai dengan industri dan ketentuan regulator, termasuk me-*review strategic collection*-nya.

Recommendations from the Board of Commissioners

Throughout 2025, the Board of Commissioners actively provided various strategic recommendations to the Board of Directors to strengthen the Company's management, including:

1. Establishing target monitoring based on the Balanced Scorecard as a tool to communicate strategy, align objectives with targets, and review performance.
2. Improving the quality of loans granted, thereby increasing the Company's revenue and maintaining Non-Performing Loans (NPLs) within industry-standard and regulatory compliance levels, including reviewing its strategic collection processes.

3. Melakukan monitoring yang intensif atas pemenuhan langkah-langkah perbaikan yang menjadi komitmen Perseroan.
4. Meningkatkan pelaksanaan Tata Kelola Perusahaan yang baik *(Good Corporate Governance)* pada seluruh tingkatan dan jenjang organisasi, khususnya untuk budaya kepatuhan di lingkungan Perseroan, *independency*.
5. Memantau pencapaian Bisnis, *profitability* produk dan layanan, dan kualitas SDM yang disediakan oleh Perseroan.

6. Pemenuhan Direktur Perseroan.

7. Melakukan evaluasi atas kompetensi Sumber Daya Manusia khususnya di aspek operasional.
8. Memperbaiki *review* dan kapasitas team Operasional khususnya berkenaan dengan adanya *Risk Event* dalam Perseroan.
9. Melakukan *review* atas tata kelola di area penagihan *(Collection)* dan program-program untuk menaikan *profitability* dan kinerja. Juga melakukan evaluasi dan revamping atas skema kerja sama dengan pihak ketiga dengan mempertimbangkan segmentasi *vintage.*
10. Perbaikan skema renumerasi.
11. Mereview kembali IT *Streering Committee* agar dapat lebih efektif dalam mengarahkan, mengawasi, dan mengkoordinasikan jalannya suatu kegiatan atau proyek IT.

Penilaian terhadap Kinerja Dewan Komisaris

Penilaian kinerja Dewan Komisaris dilaksanakan sesuai dengan ketentuan dan mekanisme yang diatur dalam kebijakan Perseroan. Secara berkala, Dewan Komisaris menyusun laporan pengawasan tahunan yang disampaikan kepada Pemegang Saham dalam RUPS.

Berdasarkan hasil penilaian kinerja tahun 2025, Dewan Komisaris dinilai berada pada kategori baik. Seluruh anggota Dewan Komisaris dinilai memiliki kompetensi dan profesionalisme yang memadai, didukung oleh latar belakang pendidikan, pengalaman, serta keahlian yang beragam, sehingga mampu mendukung efektivitas fungsi pengawasan terhadap operasional Perseroan.

3. Conducting intensive monitoring of the implementation of corrective measures as committed by the Company.
4. Enhancing the implementation of Good Corporate Governance at all levels and stages of the organization, particularly regarding a culture of compliance and independency within the Company.

5. Monitoring business performance, the profitability of products and services, and the quality of human resources provided by the Company.
6. Fulfillment of the duties of the Company's Board of Directors.
7. Conducting competency evaluations of Human Resources, particularly in operational aspect.
8. Improving the review and capacity of the Operational team, particularly regarding risk events within the Company.
9. Conducting a review of governance in the collection area and programs to increase profitability and performance. Also evaluating and revamping cooperation schemes with third parties while considering vintage segmentation.
10. Improving the remuneration scheme.
11. Re-evaluating the IT Steering Committee to be more effective in directing, supervising, and coordinating the implementation of IT activities or projects.

Performance Assessment of the Board of Commissioners

The performance assessment of the Board of Commissioners is conducted in accordance with the provisions and mechanisms stipulated in the Company's policies. Periodically, the Board of Commissioners prepares an annual supervisory report submitted to the Shareholders at the General Meeting of Shareholders.

Based on the results of the performance assessment in 2025, the Board of Commissioners was rated in the "good" category. All members of the Board of Commissioners were deemed to have adequate competence and professionalism, supported by diverse educational backgrounds, experience, and expertise, thereby enabling them to effectively support the oversight of the Company's operations.

Selain itu, Dewan Komisaris menunjukkan komitmen dan tanggung jawab yang kuat dalam memastikan Perseroan dijalankan secara berkelanjutan dengan mengedepankan prinsip-prinsip Tata Kelola Perusahaan yang Baik serta kepatuhan terhadap regulasi di sektor perbankan, pasar modal, dan ketentuan relevan lainnya. Hubungan kerja antar anggota Dewan Komisaris juga terjalin secara solid, dengan pendekatan kolaboratif dan keterbukaan dalam berdiskusi demi kepentingan terbaik Perseroan.

Penilaian Kemampuan dan Kepatutan Dewan Komisaris

Dalam pelaksanaan tugas dan tanggung jawabnya, seluruh anggota Dewan Komisaris Perseroan telah dinyatakan lulus Uji Kemampuan dan Kepatutan (*Fit and Proper Test*) yang diselenggarakan oleh Otoritas Jasa Keuangan.

Informasi mengenai hasil Uji Kemampuan dan Kepatutan bagi anggota Dewan Komisaris yang menjabat per 31 Desember 2025 disajikan sebagai berikut:

Furthermore, the Board of Commissioners demonstrates strong commitment and responsibility in ensuring that the Company is managed sustainably by upholding the principles of Good Corporate Governance and compliance with regulations in the banking sector, capital markets, and other relevant provisions. The working relationship among members of the Board of Commissioners is also solid, as characterized by a collaborative approach and openness in discussions for the best interests of the Company.

Board of Commissioners Fit and Proper Test

In carrying out their duties and responsibilities, all members of the Company's Board of Commissioners have passed the Fit and Proper Test conducted by the Financial Services Authority.

Information regarding the results of the Fit and Proper Test for members of the Board of Commissioners in office as of December 31, 2025, is presented as follows:

Nama Name	**Jabatan** Position	**No. Surat Persetujuan OJK** OJK Approval Letter Number
Inkawan D. Jusi	Komisaris Utama Independen Independent President Commissioner	KEPR-10/D.03/2024 tanggal 05 Februari 2024 KEPR-10/D.03/2024 dated February 05, 2024
Kreisna Dewantara Gozali	Komisaris Commissioner	KEPR-130/D.03/2024 tanggal 30 Oktober 2024 KEPR-130/D.03/2024 dated October 30, 2024
Pramoda Dei Sudarmo	Komisaris Independen Independent Commissioner	KEP-128/D.03/2022 tanggal 23 Agustus 2022 KEP-128/D.03/2022 dated August 23, 2022

Kelengkapan Organ Dewan Komisaris

Dalam mendukung kelancaran pelaksanaan tugas pengawasan, Dewan Komisaris didukung oleh Komite-Komite di bawah Dewan Komisaris, yaitu:

1. Komite Audit
2. Komite Pemantau Risiko
3. Komite Nominasi & Remunerasi.

Uraian lebih lanjut mengenai masing-masing komite tersebut disajikan pada bagian Organ Pendukung Dewan Komisaris dalam bab ini.

Board of Commissioners Supporting Organs

To support the effectiveness of its supervisory duties, the Board of Commissioners is assisted by the following Committees:

1. Audit Committee
2. Risk Oversight Committee
3. Nomination & Remuneration Committee.

Further details regarding each of these committees are presented in the Board of Commissioners' Supporting Organs section of this chapter.

Penilaian kinerja atas ketiga komite dilakukan secara berkala, baik secara individual maupun kolektif, melalui mekanisme *self-assessment* berdasarkan sistem penilaian yang telah disepakati bersama antara Dewan Komisaris dan Komite.

Hasil penilaian tersebut menjadi dasar bagi setiap anggota komite untuk melakukan perbaikan kinerja maupun sebagai pertimbangan perpanjangan masa bakti pada periode berikutnya. Kriteria penilaian mencakup kualitas rekomendasi yang dihasilkan, pelaksanaan rapat, tingkat keaktifan dalam komunikasi dan pemberian masukan, serta indikator relevan lainnya.

Berdasarkan hasil *self-assessment* selama tahun 2025, Dewan Komisaris menilai bahwa komite-komite di bawah Dewan Komisaris telah menjalankan perannya dengan cukup baik, serta efektif dalam mendukung pelaksanaan fungsi pengawasan sesuai dengan pedoman masing-masing komite.

Mekanisme Pemberhentian dan Pengunduran Diri Dewan Komisaris

Pemberhentian anggota Dewan Komisaris dilaksanakan dengan ketentuan sebagai berikut:

1. Anggota Dewan Komisaris dapat diberhentikan sewaktu-waktu berdasarkan keputusan RUPS dengan disertai alasan pemberhentian.

2. Keputusan pemberhentian sebagaimana dimaksud pada angka 1 diambil setelah yang bersangkutan diberikan kesempatan untuk menyampaikan pembelaan diri dalam RUPS.
3. Dalam hal keputusan pemberhentian dilakukan di luar RUPS, anggota Dewan Komisaris yang bersangkutan terlebih dahulu diberitahukan mengenai rencana pemberhentian dan diberikan kesempatan untuk membela diri sebelum keputusan ditetapkan.
4. Kesempatan untuk membela diri sebagaimana dimaksud pada angka 2 tidak diperlukan apabila anggota Dewan Komisaris yang bersangkutan menyatakan tidak keberatan atas pemberhentian tersebut.

The performance of the three committees is evaluated periodically, either individually or collectively, through a self-assessment mechanism based on an evaluation system mutually agreed upon by the Board of Commissioners and the Committees.

The results of these evaluations serve as a referrence for each committee member to improve their performance and as a consideration for the extension of their term of service in the subsequent period. The evaluation criteria cover the quality of recommendations produced, the conduct of meetings, the level of engagement in communication and the provision of feedback, as well as other relevant indicators.

Based on the results of the self-assessment during 2025, the Board of Commissioners deemed that the committees under the Board of Commissioners have performed their roles sufficiently well and have been effective in supporting the implementation of oversight functions in accordance with each committee's respective guidelines.

Mechanisms for Dismissal and Resignation of the Board of Commissioners

The dismissal of members of the Board of Commissioners is carried out in accordance with the following provisions:

1. Members of the Board of Commissioners may be dismissed at any time based on a resolution of the General Meeting of Shareholders (GMS), accompanied by the grounds for dismissal.
2. The dismissal decision as referred to in point 1 is made after the concerned party has been given the opportunity to present a defense at the GMS.
3. In the event that the dismissal decision is made outside of the GMS, the relevant member of the Board of Commissioners shall first be notified of the planned dismissal and given the opportunity to defend themselves before the decision is finalized.
4. The opportunity to defend oneself as referred to in point 2 is not required if the relevant member of the Board of Commissioners states that they have no objection to the dismissal.

Mekanisme pengunduran diri anggota Dewan Komisaris diatur sebagai berikut:

1. Anggota Dewan Komisaris dapat mengundurkan diri sebelum berakhirnya masa jabatan dengan menyampaikan surat pengunduran diri kepada Bank disertai alasan pengunduran diri, paling lambat 90 (sembilan puluh) hari atau 3 (tiga) bulan sebelum tanggal efektif pengunduran diri. Dalam hal pemberitahuan disampaikan kurang dari jangka waktu tersebut, tanggal efektif pengunduran diri harus memperoleh persetujuan Dewan Komisaris.
2. Bank wajib melaporkan pengunduran diri anggota Dewan Komisaris kepada regulator terkait dan menyelenggarakan RUPS untuk memutuskan permohonan pengunduran diri tersebut sesuai dengan ketentuan peraturan perundang-undangan yang berlaku.
3. Anggota Dewan Komisaris yang mengundurkan diri sebelum masa jabatan berakhir tetap bertanggung jawab atas pelaksanaan tugas pengawasan sejak pertanggungjawaban terakhir hingga tanggal efektif pemberhentian, yang akan dimintakan pertanggungjawabannya dalam RUPS Tahunan terdekat.
4. Anggota Dewan Komisaris yang terlibat dalam kejahatan keuangan dan/atau tindak pidana lainnya wajib mengundurkan diri.

Program Peningkatan Kompetensi Dewan Komisaris

Informasi mengenai program peningkatan kompetensi Dewan Komisaris disajikan pada Bab Tinjauan Pendukung Bisnis, bagian Sumber Daya Manusia, dalam Laporan Tahunan ini.

Kehadiran Dewan Komisaris dalam RUPS

Informasi terkait kehadiran anggota Dewan Komisaris dalam Rapat Umum Pemegang Saham disajikan pada Bab Tata Kelola, bagian Rapat Umum Pemegang Saham.

The mechanism for the resignation of a member of the Board of Commissioners is as follows:

1. Members of the Board of Commissioners may resign before the end of their term by submitting a letter of resignation to the Bank, accompanied by the reasons for resignation, no later than 90 (ninety) days or 3 (three) months prior to the effective date of resignation. If the notice is submitted within a shorter timeframe, the effective date of resignation must be approved by the Board of Commissioners.
2. The Bank is required to report the resignation of a member of the Board of Commissioners to the relevant regulator and convene a General Meeting of Shareholders to decide on the resignation request in accordance with applicable laws and regulations.
3. Members of the Board of Commissioners who resigns before the end of their term remains responsible for the performance of supervisory duties from the last accountability report until the effective date of termination, and will be held accountable for such duties at the next Annual General Meeting of Shareholders.
4. Members of the Board of Commissioners involved in financial crimes and/or other criminal offenses must resign.

Board of Commissioners Competency Development Program

Information regarding the Board of Commissioners' competency development program is presented in the Business Support Review chapter, under the Human Resources section in this Annual Report.

Attendance of the Board of Commissioners at the General Meeting of Shareholders

Information regarding the attendance of Board of Commissioners members at the General Meeting of Shareholders is presented in the Governance Chapter, under the General Meeting of Shareholders section.

Direksi
Board of Directors

Direksi merupakan organ tata kelola Perseroan yang memegang peranan strategis dalam mengelola dan mengarahkan kegiatan usaha Perseroan. Direksi menjalankan tugas secara kolektif dan individual sesuai dengan bidang tanggung jawab masing-masing, dengan tujuan mewujudkan visi dan misi Perseroan, menciptakan nilai tambah yang berkelanjutan bagi seluruh pemangku kepentingan, serta memastikan kesinambungan usaha Perseroan.

Dalam pelaksanaan tugasnya, setiap anggota Direksi wajib menaati Anggaran Dasar Perseroan dan ketentuan peraturan perundang-undangan yang berlaku, serta menjunjung tinggi prinsip profesionalisme, efisiensi, transparansi, kemandirian, akuntabilitas, pertanggungjawaban, dan kewajaran. Direksi melaksanakan seluruh tugas dan tanggung jawabnya dengan itikad baik, penuh kehati-hatian, serta rasa tanggung jawab yang tinggi.

Piagam Direksi

Perseroan memiliki Pedoman dan Tata Tertib Kerja Direksi (*Board of Directors Charter* atau *BOD Charter*) yang menjadi acuan dalam pelaksanaan tugas, tanggung jawab, dan wewenang Direksi. Piagam Direksi tersebut ditetapkan melalui Surat Keputusan Direksi.

Penyusunan Piagam Direksi mengacu pada Anggaran Dasar Perseroan, ketentuan peraturan perundang-undangan yang berlaku, serta praktik terbaik penerapan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance*), sehingga dapat menjadi pedoman yang komprehensif dan relevan dalam mendukung efektivitas kinerja Direksi.

Jumlah dan Komposisi Direksi

Sepanjang tahun 2025, tidak terdapat perubahan komposisi anggota Direksi. Per 31 Desember 2025, Direksi Perseroan terdiri dari 3 (tiga) orang, yaitu 1 (satu) Direktur Utama, 1 (satu) Direktur Bisnis, dan 1 (satu) Direktur Kepatuhan. Seluruh anggota Direksi merupakan profesional dengan kompetensi yang sesuai, didukung oleh latar belakang pendidikan, pengalaman kerja, serta keahlian yang beragam guna menunjang pengelolaan Perseroan secara optimal.

The Board of Directors is the Company's governance organ that plays a strategic role in managing and directing the Company's business activities. The Board of Directors performs its duties collectively and individually in accordance with their respective areas of responsibility, with the aim of realizing the Company's vision and mission, creating sustainable value for all stakeholders, and ensuring the continuity of the Company's business.

In carrying out their duties, each member of the Board of Directors is required to comply with the Company's Articles of Association, the applicable laws and regulations, as well as uphold the principles of professionalism, efficiency, transparency, independency, accountability, responsibility, and fairness. The Board of Directors carries out all of its duties and responsibilities in good faith, with due care, and a high sense of responsibility.

Board of Directors Charter

The Company has a Board of Directors Charter (BOD Charter) that serves as a guideline for the performance of the Board of Directors' duties, responsibilities, and authorities. This Board of Directors Charter was established through Board of Directors Resolution.

The preparation of the Board of Directors Charter is based on the Company's Articles of Association, applicable laws and regulations, as well as best practices in the implementation of Good Corporate Governance, thereby providing a comprehensive and relevant guideline to support the effectiveness of the Board of Directors' performance.

Number and Composition of the Board of Directors

Throughout 2025, there were no changes in the composition of the Board of Directors. As of December 31, 2025, the Company's Board of Directors consisted of 3 (three) members: 1 (one) President Director, 1 (one) Director of Business, and 1 (one) Director of Compliance. All members of the Board of Directors are professionals with appropriate competencies, supported by diverse educational backgrounds, work experience, and expertise to ensure optimal management of the Company.

Adapun susunan Direksi Perseroan per 31 Desember 2025 adalah sebagai berikut:

The composition of the Company's Board of Directors as of December 31, 2025, is as follows:

Nama Name	Jabatan Position	Periode Jabatan Term of Office
Eri Budiono	Direktur Utama President Director	2024-2029
Aditya Wahyu Windarwo	Direktur Bisnis Business Director	2021-2026
Ricko Irwanto	Direktur Kepatuhan Compliance Director	2021-2026

Program Pengenalan Perseroan bagi Direksi Baru

Perseroan menyelenggarakan program pengenalan (*orientation program*) bagi anggota Direksi yang baru bergabung. Program ini bertujuan untuk memberikan pemahaman yang menyeluruh mengenai Perseroan, termasuk profil, kondisi terkini, kinerja usaha, serta ruang lingkup tugas dan tanggung jawab yang akan dijalankan.

Pada tahun 2025, Perseroan tidak melakukan pelaksanaan program orientasi atau pengenalan bagi anggota Direksi, mengingat tidak terdapat anggota Direksi baru yang menjabat dalam periode tersebut.

Orientation Program for New Members of the Board of Directors

The Company conducts an orientation program for newly appointed members of the Board of Directors. This program aims to provide a comprehensive understanding of the Company, including its profile, current status, business performance, as well as their scope of duties and responsibilities.

In 2025, the Company did not conduct an orientation program for members of the Board of Directors, considering that there were no new members of the Board of Directors appointed during this period.

Kepemilikan Saham Direksi

Perseroan memiliki kebijakan terkait kepemilikan saham Direksi yang mewajibkan setiap anggota Direksi untuk mengungkapkan kepemilikan saham Perseroan paling lambat 3 (tiga) hari kerja sejak terjadinya transaksi kepemilikan saham. Kebijakan ini telah diterapkan secara konsisten melalui mekanisme pelaporan yang transparan dan sesuai dengan prinsip keterbukaan.

Share Ownership by the Board of Directors

The Company has a policy regarding share ownership by the Board of Directors that requires each Board member to disclose their ownership of the Company's shares no later than 3 (three) business days following the acquisition of shares. This policy has been consistently implemented through a transparent reporting mechanism in accordance with the principle of transparency.

Nama Name	Kepemilikan Saham di Ownership of Shares in the					
	Perseroan Company		Bank Lain Other Banks		Lembaga Keuangan Bukan Bank Non-Bank Financial Institutions	
	Lembar Shares	% Percent	Lembar Shares	% Percent	Lembar Shares	% Percent
Eri Budiono	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil
Aditya Wahyu Windarwo	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil
Ricko Irwanto	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil	Nihil Nil

Rangkap Jabatan Anggota Direksi

Hingga tanggal 31 Desember 2025, seluruh anggota Direksi Perseroan tidak memiliki rangkap jabatan pada perusahaan lain.

Concurrent Positions of Members of the Board of Directors

As of December 31, 2025, no member of the Company's Board of Directors holds concurrent positions at other companies.

Tugas dan Tanggung Jawab Direksi

Berdasarkan Piagam Direksi yang mengatur pedoman pelaksanaan tugas, tanggung jawab, dan wewenang Direksi, Direksi bertanggung jawab penuh atas pengelolaan kegiatan operasional harian Perseroan, yang meliputi antara lain:

1. Bertanggung jawab atas pengelolaan Perseroan sesuai dengan kewenangan dan tanggung jawabnya sebagaimana diatur dalam Anggaran Dasar dan Peraturan Perundang-undangan yang berlaku.
2. Bertanggung jawab penuh atas pelaksanaan kepengurusan Perseroan.
3. Melaksanakan prinsip-prinsip GCG dalam setiap kegiatan usaha Perseroan pada seluruh tingkatan atau jenjang organisasi.
4. Menindaklanjuti temuan audit dan rekomendasi dari auditor internal Perseroan, auditor eksternal, hasil pengawasan Otoritas Jasa Keuangan dan/atau hasil pengawasan otoritas lain.
5. Dalam rangka menerapkan prinsip tata kelola yang baik, direksi paling sedikit wajib membentuk:
   a. Satuan Kerja Audit Intern.
   b. Satuan Kerja Manajemen Risiko dan Komite Manajemen Risiko. dan
   c. Satuan Kerja Kepatuhan.
6. Mempertanggungjawabkan pelaksanaan tugasnya kepada Pemegang Saham melalui Rapat Umum Pemegang Saham.

Duties and Responsibilities of the Board of Directors

Based on the BOD Charter, which stipulates the guidelines for the implementation of the duties, responsibilities, and authorities of the Board of Directors, the Board of Directors is fully responsible for managing the Company's daily operations, which includes:

1. Being responsible for the management of the Company in accordance with their authority and responsibilities as stipulated in the Articles of Association and applicable laws and regulations.
2. Being fully responsible for the execution of the Company's management.
3. Implementing GCG principles in all of the Company's business activities at all levels of the organization.
4. Following up on audit findings and recommendations from the Company's internal auditor, external auditor, the results of supervision by the Financial Services Authority, and/or the results of supervision by other authorities.
5. In order to implement the principles of good corporate governance, the Board of Directors must at a least establish:
   a. Internal Audit Unit.
   b. Risk Management Unit and Risk Management Committee. and
   c. Compliance Unit.
6. Being accountable for the performance of its duties to the Shareholders through the General Meeting of Shareholders.

7. Direksi wajib mengungkapkan kepada pegawai mengenai kebijakan Perseroan yang bersifat strategis di bidang kepegawaian. dan
8. Direksi wajib menyediakan data dan informasi yang akurat, relevan, dan tepat waktu kepada Dewan Komisaris.
9. Direksi bertanggung jawab atas penerapan pengendalian internal dalam proses pelaporan keuangan Bank atau PIPK.

Wewenang Direksi

Dalam menjalankan tugas dan tanggung jawabnya, Direksi memiliki wewenang sebagai berikut:

1. Mewakili Perseroan di dalam dan di luar pengadilan dalam segala hal.
2. Direktur Utama berhak dan berwenang bertindak untuk dan atas nama Direksi serta mewakili Perseroan.
3. Direktur Utama dapat menunjuk salah satu Direktur untuk bertindak atas nama Direksi dan mewakili Perseroan apabila Direktur Utama berhalangan karena sakit, bepergian, atau sebab lain, tanpa perlu pembuktian kepada pihak ketiga.
4. Mengikat Perseroan dengan pihak lain atau sebaliknya, serta melakukan segala tindakan pengurusan dan/atau kepemilikan dengan tetap mematuhi anggaran dasar Perseroan dan ketentuan peraturan perundang-undangan. dan
5. Mengatur pembagian tugas di antara anggota Direksi secara kolektif berdasarkan musyawarah mufakat dan prinsip kekhususan masing-masing bidang.

Kewajiban Direksi

Direksi Perseroan memiliki kewajiban sebagai berikut:

1. Mengupayakan dan menjamin terlaksananya kegiatan usaha Perseroan sesuai dengan maksud dan tujuan serta bidang usaha Perseroan.
2. Menyusun dan menyampaikan Rencana Jangka Panjang Perseroan, Rencana Kerja dan Anggaran Tahunan, serta rencana kerja lainnya berikut perubahannya kepada Dewan Komisaris untuk memperoleh persetujuan.
3. Menyusun dan memelihara Daftar Pemegang Saham, Daftar Khusus, Risalah RUPS, serta Risalah Rapat Direksi.
4. Menyusun Laporan Tahunan yang memuat antara lain Laporan Keuangan sebagai bentuk pertanggungjawaban pengurusan Perseroan, serta dokumen keuangan sesuai ketentuan peraturan perundang-undangan.

7. The Board of Directors must disclose to employees the Company's strategic policies regarding human resources. and
8. The Board of Directors must provide accurate, relevant, and timely data and information to the Board of Commissioners.
9. The Board of Directors is responsible for the implementation of internal controls over the Bank's financial reporting process, or ICOFR.

Authorities of the Board of Directors

In carrying out its duties and responsibilities, the Board of Directors has the following authorities:

1. To represent the Company inside and outside of court on all matters.
2. The President Director has the right and authority to act for and on behalf of the Board of Directors and to represent the Company.
3. The President Director may appoint one of the Directors to act on behalf of the Board of Directors and represent the Company if the President Director is unable to perform his duties due to illness, travel, or other reasons, without the need for proof to third parties.
4. Binding the Company to other parties or vice versa, and performing all management and/or ownership actions while strictly adhering to the Company's Articles of Association and applicable laws and regulations. and
5. Organizing the division of duties among members of the Board of Directors collectively based on consensus and the principle of specialization in each respective field.

Duties of the Board of Directors

The Company's Board of Directors has the following duties:

1. To strive for and ensure the implementation of the Company's business activities in accordance with the Company's objectives and business fields.
2. To prepare and submit the Company's Long-Term Plan, Annual Work Plan and Budget, as well as other work plans and their amendments to the Board of Commissioners for approval.
3. To prepare and maintain the Shareholder Register, Special Register, Minutes of the General Meeting of Shareholders, and Minutes of Board of Directors Meetings.
4. To prepare the Annual Report which includes the Financial Statements as a form of accountability for the management of the Company, as well as financial documents in accordance with applicable laws and regulations.

5. Menyusun laporan keuangan berdasarkan Standar Akuntansi Keuangan dan menyerahkannya kepada Akuntan Publik untuk diaudit.
6. Menyampaikan Laporan Tahunan yang telah ditelaah oleh Dewan Komisaris kepada RUPS untuk memperoleh persetujuan dan pengesahan.
7. Memberikan penjelasan kepada RUPS terkait Laporan Tahunan.
8. Menyampaikan Neraca dan Laporan Laba Rugi yang telah disahkan oleh RUPS kepada Menteri di bidang hukum sesuai ketentuan yang berlaku.
9. Menyusun laporan lain yang diwajibkan oleh peraturan perundang-undangan.
10. Memelihara seluruh dokumen Perseroan, termasuk daftar, risalah rapat, laporan tahunan, serta dokumen keuangan lainnya.
11. Menyimpan seluruh dokumen Perseroan di tempat kedudukan Perseroan sesuai ketentuan.
12. Menyelenggarakan dan memelihara pembukuan serta administrasi Perseroan sesuai dengan praktik yang lazim.
13. Menyelenggarakan sistem akuntansi berdasarkan Standar Akuntansi Keuangan dan prinsip pengendalian internal.
14. Menyampaikan laporan berkala dan laporan lainnya kepada Dewan Komisaris dan/atau Pemegang Saham sesuai ketentuan yang berlaku, khususnya di bidang Pasar Modal.
15. Menyusun struktur organisasi Perseroan beserta uraian tugas masing-masing unit kerja.
16. Memberikan penjelasan atas setiap hal yang diminta oleh Dewan Komisaris dan Pemegang Saham dengan tetap memperhatikan ketentuan peraturan perundang-undangan. dan
17. Melaksanakan kewajiban lainnya sebagaimana diatur dalam Anggaran Dasar dan keputusan RUPS.

Pembagian Fungsi dan Tugas Pokok Direksi

Pembagian fungsi dan tugas pokok masing-masing anggota Direksi disusun untuk memastikan efektivitas pengelolaan Perseroan serta mendukung akuntabilitas dalam pelaksanaan tugas. Per 31 Desember 2025, rincian pembagian fungsi dan tanggung jawab Direksi disajikan dalam tabel berikut:

5. To prepare financial statements in accordance with Financial Accounting Standards and submit them to a Public Accountant for audit.
6. To submit the Annual Report, which has been reviewed by the Board of Commissioners, to the General Meeting of Shareholders for approval and ratification.
7. To provide explanations to the General Meeting of Shareholders regarding the Annual Report.
8. To submit the Balance Sheet and Income Statement, which have been approved by the General Meeting of Shareholders, to the Minister of Law in accordance with applicable regulations.
9. To prepare other reports required by applicable laws and regulations.
10. To maintain all Company documents, including registers, meeting minutes, annual reports, and other financial documents.
11. To archive all of the Company's documents at the Company's registered office in accordance with applicable regulations.
12. To maintain the Company's books and records and administration in accordance with generally accepted practices.
13. To implement an accounting system based on Financial Accounting Standards and internal control principles.
14. To submit periodic reports and other reports to the Board of Commissioners and/or Shareholders in accordance with applicable regulations, particularly in the Capital Market sector.
15. To establish the Company's organizational structure along with the job descriptions for each work unit.
16. To provide explanations regarding any matters requested by the Board of Commissioners and Shareholders while adhering to applicable laws and regulations. and
17. To fulfill other obligations as stipulated in the Articles of Association and resolutions of the General Meeting of Shareholders.

Division of Functions and Primary Duties of the Board of Directors

The division of functions and primary duties of each member of the Board of Directors is established to ensure the effectiveness of the Company's management and to support accountability in the performance of duties. The division of functions and responsibilities of the Board of Directors as of December 31, 2025 is presented in the following table:

Jabatan Position	Bidang Tugas dan Tanggung Jawab Duties and Responsibilities
Direktur Utama President Director	• Satuan Kerja Audit Intern • Non-Retail Credit Review dan Retail Credit Review. • Financial Control, Regulatory Reporting & Tax, Statutory, MIS, Project & Control, Corporate Planning & Investor Relation • Digital Operation, Credit Admin, dan Operation • Human Resources • Sekretaris Perusahaan • Anti Fraud Management • Internal Audit Unit • Non-Retail Credit Review and Retail Credit Review. • Financial Control, Regulatory Reporting & Tax, Statutory, MIS, Project & Control, Corporate Planning & Investor Relation • Digital Operation, Credit Admin, and Operation • Human Resources • Corporate Secretary • Anti Fraud Management
Direktur Bisnis Business Director	• Commercial Lending • Retail, Digital & SME Lending • Corporate Solution • Treasury • Middle Office • Funding & Business Network • Data & Digital Product • Neo Business • Partnership & Strategic Alliances • Marketing
Direktur Teknologi Sistem Informasi Director of Information Systems and Technology	IT Operation, IT Development, IT Security & Governance.
Direktur Kepatuhan Compliance Director	• Legal • Risk Management • Compliance

Rapat Direksi

Direksi wajib menyelenggarakan rapat paling sedikit 1 (satu) kali dalam 1 (satu) bulan sesuai dengan ketentuan Peraturan Otoritas Jasa Keuangan No. 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum. Selain itu, Direksi juga diwajibkan untuk mengadakan rapat bersama Dewan Komisaris paling sedikit 1 (satu) kali dalam 4 (empat) bulan.

Di luar ketentuan tersebut, rapat Direksi dapat diselenggarakan sewaktu-waktu atas permintaan 1 (satu) atau lebih anggota Direksi maupun atas permintaan Dewan Komisaris, dengan mencantumkan agenda yang akan dibahas. Setiap pelaksanaan rapat Direksi didokumentasikan dalam risalah rapat yang disusun oleh Sekretaris Perusahaan dan ditandatangani oleh pimpinan rapat serta seluruh anggota Direksi yang hadir. Risalah rapat memuat pokok pembahasan dan keputusan yang diambil sebagai bentuk pertanggungjawaban dan dokumentasi tata kelola.

Board of Directors Meeting

The Board of Directors is required to hold a meeting at least once every month in order to comply with the provisions of Financial Services Authority Regulation No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks. In addition, the Board of Directors is also required to hold a joint meeting with the Board of Commissioners at least once every four months.

Beyond these requirements, Board of Directors meetings may be held at any time upon the request of one or more members of the Board of Directors or upon the request of the Board of Commissioners, provided that the agenda to be discussed is included. Each Board of Directors meeting is documented in meeting minutes prepared by the Corporate Secretary and signed by the chairperson of the meeting as well as all members of the Board of Directors in attendance. The meeting minutes contain the main points of discussion and decisions made as a form of accountability and governance documentation.

Sepanjang tahun 2025, Direksi telah memenuhi seluruh ketentuan frekuensi rapat sebagaimana dipersyaratkan, dengan total pelaksanaan rapat sebanyak 30 kali.

Throughout 2025, the Board of Directors has met all the required meeting frequency provisions, with a total of 30 meetings held.

Nama Name	**Jabatan** Position	**Rapat Direksi** BOD Meeting		
		Jumlah Rapat Total Meeting	**Jumlah Kehadiran** Total Attendance	**Kehadiran %** Attendance %
Eri Budiono	Direktur Utama President Director	30	30	100,00
Aditya Wahyu Windarwo	Direktur Bisnis Business Director	30	30	100,00
Ricko Irwanto	Direktur Kepatuhan Compliance Director	30	30	100,00

Pelaksanaan Tugas dan Tanggung Jawab Direksi Tahun 2025

Selama tahun 2025, Direksi telah menjalankan tugas dan tanggung jawab pengelolaan Perseroan secara konsisten sesuai dengan ketentuan peraturan perundang-undangan yang berlaku dan Anggaran Dasar Perseroan. Pelaksanaan tugas tersebut dilakukan berdasarkan fungsi dan tugas pokok masing-masing anggota Direksi guna memastikan operasional Perseroan berjalan secara efektif, *prudent,* dan berkelanjutan.

Implementation of the Board of Directors' Duties and Responsibilities in 2025

Throughout 2025, the Board of Directors has consistently carried out its duties and responsibilities to manage the Company in accordance with applicable laws and regulations as well as the Company's Articles of Association. These duties were performed based on the respective functions and primary responsibilities of each Board member to ensure that the Company's operations are effective, prudent, and sustainable.

Penilaian Kinerja Direksi

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

Selain penilaian secara kolektif, Dewan Komisaris juga melakukan evaluasi secara individual terhadap kinerja masing-masing anggota Direksi. Berdasarkan hasil penilaian tersebut, Dewan Komisaris menilai bahwa seluruh anggota Direksi telah melaksanakan tugas dan tanggung jawabnya dengan baik, tercermin dari tidak adanya permasalahan signifikan yang berdampak negatif terhadap operasional Perseroan.

Board of Directors Performance Assessment

The Company has a Board of Directors performance assessment policy that aligns with applicable regulations, particularly POJK No. 5/POJK.03/2016 dated January 26, 2016, regarding the Business Plan of Commercial Banks, as well as other relevant regulations. The Board of Directors' performance assessment is conducted through the preparation of the Business Plan Supervisory Report, which is submitted on a semi-annual basis to the supervisory division of the Financial Services Authority.

Besides collective assessment, the Board of Commissioners also conducts individual assessments of the performance of each Board of Directors member. Based on the results of these assessments, the Board of Commissioners concludes that all Board of Directors members have performed their duties and responsibilities well, as evidenced by the absence of significant issues that negatively impact the Company's operations.

Penilaian Kemampuan dan Kepatutan Direksi

Dalam menjalankan tugasnya, seluruh anggota Direksi Perseroan telah dinyatakan lulus Uji Kemampuan dan Kepatutan (*Fit and Proper Test*) yang diselenggarakan oleh Otoritas Jasa Keuangan. Informasi mengenai hasil Uji Kemampuan dan Kepatutan bagi anggota Direksi yang menjabat per 31 Desember 2025 disajikan dalam tabel berikut:

Board of Directors Fit and Proper Test

In carrying out their duties, all members of the Company's Board of Directors have passed the Fit and Proper Test conducted by the Financial Services Authority. Information regarding the results of the Fit and Proper Test for Board of Directors members in office as of December 31, 2025, is presented in the following table:

Nama Name	**Jabatan** Position	**No. Surat Persetujuan OJK** OJK Approval Letter Number
Eri Budiono	Direktur Utama President Director	KEPR-66/D.03/2024 tanggal 6 Agustus 2024 KEPR-66/D.03/2024 dated August 6, 2024
Aditya Wahyu Windarwo	Direktur Bisnis Business Director	KEP-47/PB.1/2021 tanggal 18 Juni 2021 KEP-47/PB.1/2021 dated June 18, 2021
Ricko Irwanto	Direktur Kepatuhan Compliance Director	KEP-9/PB.1/2022 tanggal 19 Januari 2022 KEP-9/PB.1/2022 dated January 19, 2022

Mekanisme Pemberhentian dan Pengunduran Diri Direksi

Ketentuan mengenai pemberhentian dan pengunduran diri Direksi diatur dalam Anggaran Dasar Perseroan, dengan ketentuan sebagai berikut:

1. Anggota Direksi berhak mengundurkan diri dari jabatannya dengan menyampaikan pemberitahuan tertulis kepada Perseroan paling lambat 60 (enam puluh) hari sebelum tanggal efektif pengunduran diri.
2. Perseroan wajib menyelenggarakan RUPS untuk memutuskan permohonan pengunduran diri anggota Direksi paling lambat 90 (sembilan puluh) hari sejak diterimanya permohonan pengunduran diri tersebut.
3. Apabila Perseroan tidak menyelenggarakan RUPS dalam jangka waktu sebagaimana dimaksud pada butir 2, maka pengunduran diri anggota Direksi dinyatakan sah dengan sendirinya tanpa memerlukan persetujuan RUPS, dengan kewajiban Perseroan untuk melaporkan pengunduran diri tersebut pada RUPS berikutnya.
4. Sebelum pengunduran diri berlaku efektif, anggota Direksi yang bersangkutan tetap berkewajiban menyelesaikan seluruh tugas dan tanggung jawabnya sesuai dengan Anggaran Dasar, peraturan perundang-undangan, serta ketentuan di bidang Pasar Modal.

Mechanisms for the Dismissal and Resignation of Directors

Provisions regarding the dismissal and resignation of the Board of Directors are set forth in the Company's Articles of Association, as follows:

1. Members of the Board of Directors have the right to resign from their positions by submitting a written notice to the Company no later than 60 (sixty) days prior to the effective date of resignation.
2. The Company is required to hold a General Meeting of Shareholders (GMS) to consider the resignation request of a Board member no later than 90 (ninety) days from the receipt of resignation request.
3. If the Company fails to convene a General Meeting of Shareholders within the timeframe specified in point 2, the resignation of the Board member shall become effective automatically without requiring the approval of the General Meeting of Shareholders, with the Company being obligated to report the resignation at the next General Meeting of Shareholders.
4. Prior to the resignation becoming effective, the relevant Board member remains obligated to fulfill all duties and responsibilities in accordance with the Articles of Association, applicable laws and regulations, and capital market provisions.

5. Anggota Direksi yang mengundurkan diri dinyatakan bebas dari tanggung jawab setelah memperoleh pembebasan dan pelunasan tanggung jawab (*acquit et de charge*) dari RUPS Tahunan.
6. Dalam hal pengunduran diri anggota Direksi menyebabkan jumlah Direksi menjadi kurang dari 3 (tiga) orang, maka pengunduran diri tersebut dinyatakan sah setelah ditetapkan oleh RUPS dan Perseroan telah mengangkat anggota Direksi baru sehingga memenuhi ketentuan jumlah minimal Direksi.

Peningkatan Kompetensi Direksi

Informasi mengenai program peningkatan kompetensi Direksi disajikan pada Bab Tinjauan Pendukung Bisnis, bagian Sumber Daya Manusia dalam Laporan Tahunan ini.

Kehadiran Direksi dalam RUPS

Informasi mengenai kehadiran Direksi dalam Rapat Umum Pemegang Saham disampaikan pada bagian Rapat Umum Pemegang Saham dalam laporan ini.

Kebijakan Keberagaman Komposisi Anggota Dewan Komisaris dan Direksi

Perseroan menerapkan prinsip keberagaman dalam komposisi Dewan Komisaris dan Direksi dengan mengacu pada ketentuan yang berlaku, diantaranya POJK 17 Tahun 2023 tentang Penerapan Tata Kelola bagi Bank Umum, SEOJK No. 14/SEOJK.03/2025 tentang Penerapan Tata Kelola bagi Bank Umum, serta SEOJK No.32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka. Ketentuan tersebut menegaskan bahwa susunan Dewan Komisaris dan Direksi merupakan kombinasi karakteristik yang disesuaikan dengan kebutuhan Perseroan.

Dalam proses pencalonan dan penunjukan anggota Dewan Komisaris dan Direksi, Perseroan mempertimbangkan berbagai aspek keberagaman, antara lain latar belakang pendidikan, pengalaman kerja, usia, keahlian, serta independensi, tanpa membedakan gender, suku, agama, maupun ras. Komposisi yang beragam ini diharapkan dapat memperkaya perspektif serta mendukung proses pengambilan keputusan dan perumusan kebijakan Perseroan secara lebih efektif dan berimbang.

5. Members of the Board who resign are discharged from their responsibilities after receiving acquittal and discharge (acquit et de charge) from the Annual General Meeting.
6. In the event that the resignation of a member of the Board of Directors results in the number of Board members being less than 3 (three) persons, such resignation shall be deemed valid after being approved by the General Meeting of Shareholders and the Company has appointed a new member of the Board of Directors in order to meet the minimum requirement for the number of Board members.

Board of Directors Competency Development

Information regarding the Board of Directors' competency development program is presented in the Business Support Review chapter, under the Human Resources section of this Annual Report.

Board of Directors Attendance at the General Meeting of Shareholders

Information regarding the Board of Directors' attendance at the General Meeting of Shareholders is provided in the General Meeting of Shareholders section of this report.

Policy on Diversity in the Composition of the Board of Commissioners and Board of Directors

The Company applies the principle of diversity in the composition of the Board of Commissioners and Board of Directors in accordance with applicable regulations, including POJK No. 17 of 2023 on the Implementation of Corporate Governance for Commercial Banks, SEOJK No. 14/SEOJK. 03/2025 on the Implementation of Corporate Governance for Commercial Banks, and SEOJK No. 32/SEOJK.04/2015 on Guidelines for Corporate Governance of Public Companies. These provisions emphasize that the composition of the Board of Commissioners and the Board of Directors is a combination of characteristics tailored to the Company's needs.

In the process of nominating and appointing members of the Board of Commissioners and the Board of Directors, the Company considers various aspects of diversity, including educational background, work experience, age, expertise, and independence, regardless of gender, ethnicity, religion, or race. This diverse composition is expected to enrich perspectives and support the Company's decision-making and policy formulation processes in a more effective and balanced manner.

Nominasi dan Remunerasi Dewan Komisaris dan Direksi

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

Nominasi Dewan Komisaris dan Direksi

Proses nominasi, pengangkatan, serta pemberhentian anggota Dewan Komisaris dan Direksi Perseroan dilaksanakan oleh Pemegang Saham melalui mekanisme Rapat Umum Pemegang Saham (RUPS). Dalam mendukung proses tersebut, Komite Nominasi dan Remunerasi menjalankan fungsi evaluasi dan penilaian terhadap calon anggota Dewan Komisaris dan Direksi, yang hasilnya disampaikan sebagai rekomendasi kepada Dewan Komisaris. Selanjutnya, Dewan Komisaris akan mengajukan rekomendasi tersebut untuk memperoleh persetujuan RUPS.

Remunerasi Dewan Komisaris dan Direksi

Perseroan menetapkan kebijakan remunerasi bagi Dewan Komisaris dan Direksi berdasarkan ketentuan internal dengan tetap memperhatikan prinsip kewajaran serta praktik yang berlaku secara umum. Penetapan honorarium dan tantiem bagi Dewan Komisaris, serta gaji dan tantiem bagi Direksi, ditentukan melalui keputusan RUPS. Hingga saat ini, Perseroan belum menerapkan kebijakan pemberian remunerasi dalam bentuk opsi saham kepada Dewan Komisaris, Direksi, maupun Pejabat Eksekutif.

Adapun paket remunerasi dan fasilitas lainnya bagi Dewan Komisaris dan Direksi adalah sebagai berikut:

1. Remunerasi dalam bentuk non-natura:
   a. Dewan Komisaris: honorarium dan tantiem; dan
   b. Direksi: gaji dan tantiem;

2. Remunerasi dalam bentuk natura/nonnatura:
   a. Dewan Komisaris: Tunjangan Hari Raya dan Tunjangan Ketenagakerjaan; dan
   b. Direksi: Tunjangan Kesehatan, Tunjangan BPJS Ketenagakerjaan, Tunjangan Dana Pensiun, Tunjangan Hari Raya, serta fasilitas kendaraan dinas.

Nomination of the Board of Commissioners and Board of Directors

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

Remuneration of the Board of Commissioners and the Board of Directors

The Company establishes remuneration policies for the Board of Commissioners and the Board of Directors based on internal regulations while adhering to principles of fairness and generally accepted practices. The determination of honorarium and allowances for the Board of Commissioners, as well as salaries and tantiem for the Board of Directors, is decided through a resolution of the General Meeting of Shareholders. To date, the Company has no policy of providing stock options as remuneration to the Board of Commissioners, the Board of Directors, or Executive Officers.

The remuneration packages and other benefits for the Board of Commissioners and the Board of Directors are as follows:

1. Non-cash remuneration:
   a. Board of Commissioners: honorarium and tantiem; and
   b. Board of Directors: salary and tantiem;

2. Cash/non-cash remuneration:
   a. Board of Commissioners: Holiday Allowance and Employment Allowance; and
   b. Board of Directors: Health Allowance, BPJS Ketenagakerjaan Allowance, Pension Fund Allowance, Holiday Allowance, and official vehicle facilities.

Jenis Remunerasi dan Fasilitas Lain Types of Remuneration and Other Facilities	Jumlah Remunerasi dalam 1 Tahun Total Remuneration in 1 (one) Year			
	Dewan Komisaris Board of Commissioner		Direksi Board of Directors	
	Jumlah Anggota Total Members	Jumlah Remunerasi Total Remuneration	Jumlah Anggota Total Members	Jumlah Remunerasi Total Remuneration
Remunerasi (Gaji, Bonus, Tunjangan Rutin, Tantiem dan Fasilitas Lainnya dalam bentuk non-natura) Remuneration (Salary, Bonus, Routine Allowance, Tantiem and Other non-cash Facilities)	3	5.903,5	3	15.743,4
Fasilitas Lainnya dalam bentuk Natura (Perumahan, Transportasi, Asuransi/ Kesehatan, dan Lainnya) Other Facilities in the form of Natura (Housing, Transportation, Insurance / Health, and Others):	3	460,5	3	1.725,6

No	Rasio Gaji Tertinggi dan Terendah Highest and Lowest Salary Ratio	Rasio Ratio
1	Rasio gaji pegawai tertinggi dan terendah Highest and lowest employee salary ratio	1 : 29,6
2	Rasio gaji Direksi tertinggi dan terendah Highest and lowest Directors' salary ratio	1 : 1,2
3	Rasio gaji Komisaris tertinggi dan terendah Highest and lowest Commissioner salary ratio	1 : 1,7
4	Rasio gaji Direksi tertinggi dan pegawai tertinggi Salary ratio of highest director and highest employee	1 : 1,5

Organ Pendukung Dewan Komisaris
Supporting Organs of the Board of Commissioners

Dalam pelaksanaan tugas pengawasan dan pemberian nasihat, Dewan Komisaris didukung oleh beberapa komite, yaitu Komite Audit, Komite Pemantau Risiko, serta Komite Nominasi dan Remunerasi, guna memastikan penerapan Tata Kelola Perusahaan yang Baik secara konsisten dan berkelanjutan.

In carrying out its supervisory and advisory duties, the Board of Commissioners is supported by several committees, including the Audit Committee, the Risk Oversight Committee, and the Nomination and Remuneration Committee, which ensure consistent and sustainable implementation of Good Corporate Governance.

Komite Audit

Audit Committee

Komite Audit merupakan komite yang dibentuk oleh dan bertanggung jawab kepada Dewan Komisaris untuk membantu pelaksanaan fungsi pengawasan, khususnya yang berkaitan dengan proses audit, penyajian informasi keuangan, sistem pengendalian internal, efektivitas audit internal dan eksternal, serta kepatuhan Perseroan terhadap ketentuan yang berlaku. Dalam menjalankan tugasnya, Komite Audit menyampaikan pandangan dan rekomendasi secara independen atas berbagai hal yang memerlukan perhatian Dewan Komisaris, sejalan dengan prinsip Tata Kelola Perusahaan yang Baik dan peraturan perundang-undangan.

The Audit Committee is a committee established by and accountable to the Board of Commissioners to assist in the performance of supervisory functions, particularly those related to the audit process, the presentation of financial information, internal control systems, the effectiveness of internal and external audits, and the Company's compliance with applicable regulations. In carrying out its duties, the Audit Committee provides independent opinions and recommendations on various matters that require the attention of the Board of Commissioners, in accordance with the principles of Good Corporate Governance and applicable laws and regulations.

Pedoman dan Tata Tertib *(Charter)* Komite Audit

Komite Audit Perseroan telah memiliki Pedoman dan Tata Tertib *(Charter)* yang mengatur, antara lain, aspek organisasi, keanggotaan, independensi, tugas dan tanggung jawab, kewenangan, etika kerja, mekanisme rapat, pelaporan, serta masa jabatan. Pedoman tersebut dievaluasi secara berkala untuk memastikan kesesuaiannya dengan ketentuan yang berlaku serta perkembangan kegiatan usaha Perseroan. Pedoman terakhir telah disetujui oleh seluruh anggota Komite Audit pada bulan Mei 2024.

Audit Committee Charter

The Company's Audit Committee has established a Charter that regulates organizational aspects, membership, independence, duties and responsibilities, authority, professional ethics, meeting procedures, reporting, and term of office. The Charter is periodically evaluated to ensure their compliance with applicable regulations and the development of the Company's business activities. The latest charter was approved by all members of the Audit Committee in May 2024.

Jumlah dan Komposisi Anggota Komite Audit

Sesuai dengan Pedoman dan Tata Tertib Kerja Komite Audit serta ketentuan peraturan perundangundangan, Komite Audit sekurangkurangnya terdiri dari 3 (tiga) orang anggota independen, yang meliputi Komisaris Independen dan Pihak Independen, dengan komposisi paling sedikit sebagai berikut:

Number and Composition of Audit Committee Members

In accordance with the Audit Committee Charter and the applicable laws and regulations, the Audit Committee consists of at least 3 (three) independent members, including Independent Commissioners and Independent Parties, with a minimum composition as follows:

1. Seorang Komisaris Independen.
2. Seorang pihak independen yang memiliki keahlian di bidang keuangan atau akuntansi; dan
3. Seorang pihak independen yang memiliki keahlian di bidang hukum atau perbankan.

1. One Independent Commissioner.
2. One independent party with expertise in finance or accounting; and
3. One independent party with expertise in law or banking.

Sepanjang tahun 2025, susunan dan komposisi anggota Komite Audit Perseroan mengalami beberapa perubahan, sebagaimana dirinci dalam tabel berikut:

Throughout 2025, the composition of the Company's Audit Committee had changed several times, as detailed in the following table:

No	Surat Keputusan Direksi Decision Letter	Tanggal Efektif SK Decree Effective Date	Ketua Chairman	Anggota Member	Anggota Member
1	SKEP/219/SET/BNC/XII/2024	18 Des 2024	Pramoda Dei Sudarmo	Johny Kandano	Mahdan Ibrahim
2	SKEP/099/SET/BNC/VIII/2025	4 Aug 2025	Pramoda Dei Sudarmo	Johny Kandano	Jusuf Sukiman

Adapun susunan anggota Komite Audit Perseroan per 31 Desember 2025 adalah sebagai berikut:

The composition of the Company's Audit Committee as of December 31, 2025 is as follows:

Nama Name	Jabatan Position	Keterangan Description
Pramoda Dei Sudarmo	Ketua Chairman	Komisaris Utama Independen Independent President Commissioner
Johny Kandano	Anggota Member	Pihak Independen Independent Party
Jusuf Sukiman	Anggota Member	Pihak Independen Independent Party

Profil Komite Audit

Audit Committee Profile

Pramoda Dei Sudarmo
Ketua Komite Audit
Chairman of Audit Committee

Profil lengkap Pramoda Dei Sudarmo dapat dilihat pada Bab Profil Perusahaan bagian Dewan Komisaris dalam Laporan Tahunan ini.
Pramoda Dei Sudarmo's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Mahdan Ibrahim
Anggota Komite Audit
Audit Committee Member

Profil lengkap Mahdan Ibrahim dapat dilihat pada Bab Tata Kelola bagian Komite Pemantau Risiko dalam Laporan Tahunan ini.
Mahdan Ibrahim's complete profile can be found in the Corporate Govenrnance Chapter, under the Risk Oversight Committee section of this Annual Report.

Johny Kandano
Anggota Komite Audit
Audit Committee Member

WNI, usia 54 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 54 years old, Indonesian Citizenship

Riwayat Pendidikan/Sertifikasi	• 1997 International Master of Business Administration, Texas Graduate School of International Management, Texas, USA dan International University of the Americas, Costa Rica • 1995 Sarjana Sains, Universitas Hasanuddin, Ujung Pandang, Indonesia • 1997 International Master of Business Administration, Texas Graduate School of International Management, Texas, USA and International University of the Americas, Costa Rica • 1995 Bachelor of Science, Hasanuddin University, Ujung Pandang, Indonesia
Riwayat Pekerjaan Work Experience	• 2024 - sekarang: Anggota Komite Audit PT Bank Neo Commerce Tbk • 2023 - sekarang: Komisaris Utama PT Lentera Dana Nusantara • 2022 - sekarang: Direktur PT Access Digital Frontier • 2021 - sekarang: Komisaris Utama PT Scoring Teknologi Indonesia • 2021 - sekarang: Komisaris Utama PT Asuransi Jiwa SeaInsurance • 2024 - present: Member of Audit Committee of PT Bank Neo Commerce Tbk • 2023 - present: President Commissioner of PT Lentera Dana Nusantara • 2022 - present: Director of PT Access Digital Frontier • 2021 - present: President Commissioner of PT Scoring Teknologi Indonesia • 2021 - present: President Commissioner of PT SeaInsurance Life Insurance
Jabatan Lainnya Other Position	Tidak Ada None
Dasar Hukum Pengangkatan Legal Basis for Appointment	Surat Keputusan Direksi No. SKEP/005/SET/BNC/I/2024 tanggal 15 Januari 2024. Director Decision Letter No. SKEP/005/SET/BNC/I/2024 Date January 15, 2024.
Hubungan Afiliasi Affiliated Relationship	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi ataupun pemegang saham pengendali. No affiliation with other members of the Board of Commissioners, members of the Board of Directors or controlling shareholders.
Periode Jabatan Term of Office	Januari 2024 sampai sekarang January 2024 until now

Jusuf Sukiman
Anggota Komite Audit
Audit Committee Member

WNI, usia 63 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 63 years old, Indonesian Citizenship

Riwayat Pendidikan/Sertifikasi	• 2014 Executive MBA Program, Asian Institute of Management • 1998 Magister Sistem Informasi, Universitas Gunadarma • 1987 Sarjana Akuntansi, Universitas Trisakti • 2014 Executive MBA Program, Asian Institute of Management • 1998 Master of Information Systems, Universitas Gunadarma • 1987 Bachelor of Accounting, Universitas Trisakti
Riwayat Pekerjaan Work Experience	• Komite Audit PT Adira Dinamika Multifinace Tbk (2021 – sekarang) • Chief Internal Auditor pada PT Bank Mega Tbk (2006 - 2020) • VP Internal Auditor pada CT Corporation (2005 - 2006) • Regional Audit Division Head PT Bank Danamon Indonesia Tbk (1988 - 2005) • Senior Auditor PT United City Bank (1986 – 1988) • Komite Audit PT Adira Dinamika Multifinace Tbk (2021 – sekarang) • Chief Internal Auditor pada PT Bank Mega Tbk (2006 - 2020) • VP Internal Auditor pada CT Corporation (2005 - 2006) • Regional Audit Division Head PT Bank Danamon Indonesia Tbk (1988 - 2005) • Senior Auditor PT United City Bank (1986 – 1988)
Jabatan Lainnya Other Position	Tidak Ada None
Dasar Hukum Pengangkatan Legal Basis for Appointment	Surat Keputusan Nomor SKEP/099/SET/BNC/VIII/2025 tanggal 4 Agustus 2025 Decree Number SKEP/099/SET/BNC/VIII/2025 dated August 4, 2025
Hubungan Afiliasi Affiliated Relationship	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi ataupun pemegang saham pengendali. No affiliation with other members of the Board of Commissioners, members of the Board of Directors or controlling shareholders.
Periode Jabatan Term of Office	Agustus 2025 sampai sekarang August 2025 until now

Independensi Komite Audit

Dalam menjalankan tugas dan fungsinya, Komite Audit senantiasa menjunjung tinggi prinsip independensi. Seluruh anggota Komite Audit telah memenuhi kriteria independensi sebagai berikut:

1. Tidak bekerja atau memiliki kewenangan dan tanggung jawab dalam perencanaan, kepemimpinan, pengendalian, maupun pengawasan kegiatan Perseroan dalam jangka waktu 6 (enam) bulan terakhir, kecuali Komisaris Independen.
2. Tidak memiliki saham Perseroan, baik secara langsung maupun tidak langsung.
3. Tidak memiliki hubungan afiliasi dengan Perseroan, anggota Dewan Komisaris, anggota Direksi, maupun Pemegang Saham Pengendali Perseroan. dan
4. Tidak memiliki hubungan usaha, baik secara langsung maupun tidak langsung, yang berkaitan dengan kegiatan usaha Perseroan.

Independency of the Audit Committee

In carrying out its duties and functions, the Audit Committee consistently upholds the principle of independence. All members of the Audit Committee have met the following independency criteria:

1. Have not worked for or held authority and responsibility in the planning, leadership, control, or supervision of the Company's activities within the last 6 (six) months, except for Independent Commissioners.
2. Have no shares in the Company, either directly or indirectly.
3. Have no affiliation with the Company, members of the Board of Commissioners, members of the Board of Directors, or the Company's Controlling Shareholders. and
4. Have no business relationship, either directly or indirectly, related to the Company's business activities.

Tugas dan Tanggung Jawab Komite Audit

Tugas dan tanggung jawab Komite Audit meliputi, antara lain:

1. Melakukan penelaahan atas informasi keuangan yang akan diterbitkan Bank kepada publik dan/atau pihak otoritas antara lain laporan keuangan (tiga bulanan/semesteran/tahunan), proyeksi keuangan, laporan tahunan dan laporan lainnya terkait dengan informasi keuangan Bank dengan melakukan kegiatan-kegiatan di bawah ini:
   a. Menelaah proses penyusunan laporan keuangan dan memastikan terpenuhinya standar-standar akuntansi dan ketentuan peraturan perundang-undangan yang berlaku.
   b. Memastikan laporan keuangan dan informasi lainnya yang terkait keuangan Bank disajikan berdasarkan data keuangan atau akuntansi manajemen secara benar dan akurat, sesuai dengan prinsip akuntansi yang berlaku umum serta asumsi yang dipakai sesuai praktik bisnis yang lazim.
   c. Memastikan kesesuaian Laporan Keuangan dengan standar akuntansi keuangan yang terkini.
   d. Menelaah pengaduan yang berkaitan dengan proses akuntansi dan laporan keuangan Bank, dan karenanya Komite dapat meminta dan secara langsung menerima laporan, menetapkan atau melakukan investigasi serta tindakan lain yang diperlukan sehubungan dengan pengaduan yang diterima, manakala pengaduan yang diterima diduga melibatkan anggota Direksi atau manajemen tertentu.
2. Melakukan penelaahan atas ketaatan terhadap peraturan perundang-undangan yang berhubungan dengan kegiatan usaha Bank termasuk dan tidak terbatas pada peraturan perundang-undangan di bidang pasar modal, dan/atau peraturan terkait tata kelola perusahaan yang baik (*Good Corporate Governance*).
3. Memberikan rekomendasi kepada Dewan Komisaris mengenai penunjukan Akuntan Publik (AP) dan/atau Kantor Akuntan Publik (KAP) yang akan memberikan jasa audit atas informasi keuangan historis tahunan, yang didasarkan pada independensi, ruang lingkup penugasan dan imbal Jasa.

Duties and Responsibilities of the Audit Committee

The duties and responsibilities of the Audit Committee include, among others:

1. Reviewing financial information to be disclosed by the Bank to the public and/or regulatory authorities, including financial statements (quarterly/semiannual/annual), financial projections, annual reports, and other reports related to the Bank's financial information, by conducting the following activities:
   a. Reviewing the financial reporting process and ensuring compliance with applicable accounting standards and legal regulations.
   b. Ensuring that the Bank's financial statements and other financial information are presented based on financial or management accounting data truthfully and accurately, in accordance with generally accepted accounting principles and assumptions consistent with standard business practices.
   c. Ensuring the financial statements comply with current financial accounting standards.
   d. Reviewing complaints related to the Bank's accounting processes and financial statements. in this regard, the Committee may request and directly receive reports, initiate or conduct investigations, and take other necessary actions regarding received complaints, particularly when such complaints are suspected to involve specific members of the Board of Directors or management.
2. Reviewing compliance with laws and regulations related to the Bank's business activities, including but not limited to regulations in the capital markets sector, and/or regulations regarding good corporate governance (Good Corporate Governance).
3. Providing recommendations to the Board of Commissioners regarding the appointment of a Public Accountant (AP) and/or a Public Accounting Firm (KAP) to provide audit services for the Bank's annual historical financial information, based on independence, scope of engagement, and fees.

4. Terkait dengan pelaksanaan jasa audit atas informasi keuangan Bank yang dilakukan oleh AP dan/atau KAP:
   a. Mengawasi pelaksanaan audit dan memantau hasil temuan audit yang dilakukan oleh AP dan/atau KAP.
   b. Memastikan AP dan/atau KAP meng-komunikasikan segera hal-hal/temuan yang signifikan kepada Komite Audit untuk disampaikan kepada Dewan Komisaris.
   c. Memastikan manajemen Bank melakukan tindak lanjut atas hasil temuan AP dan/atau KAP.
5. Memberikan pendapat independen dalam hal terjadi perbedaan pendapat antara manajemen Bank dan AP dan/atau KAP atas jasa yang diberikannya.
6. Melakukan evaluasi terhadap pelaksanaan pemberian jasa audit atas informasi keuangan historis tahunan oleh AP dan/atau KAP, evaluasi tersebut dilakukan melalui:
   a. Evaluasi kesesuaian pelaksanaan audit oleh AP dan/atau KAP dengan standar audit yang berlaku.
   b. Kecukupan waktu pekerjaan lapangan.
   c. Pengkajian cakupan jasa yang diberikan dan kecukupan uji petik. dan
   d. Rekomendasi perbaikan yang diberikan oleh AP dan/atau KAP.
7. Memantau dan mengevaluasi perencanaan dan pelaksanaan pemeriksaan (audit) oleh audit intern dan mengawasi pelaksanaan tindak lanjut hasil audit dalam rangka menilai kecukupan pengendalian intern termasuk kecukupan proses pelaporan keuangan.
8. Melakukan kaji ulang (*review*) terhadap pelaksanaan tindak lanjut oleh Direksi atas hasil temuan SKAI, akuntan publik dan hasil pengawasan Otoritas Jasa Keuangan.
9. Menelaah pengaduan yang berkaitan dengan proses akuntansi dan pelaporan keuangan Bank.
10. Menelaah dan memberikan saran kepada Dewan Komisaris terkait adanya potensi benturan kepentingan Bank.
11. Memberikan rekomendasi kepada Dewan Komisaris atas pengangkatan dan/atau penggantian dan/atau pemberhentian Kepala SKAI Bank.
12. Mengevaluasi dan menyampaikan hasil evaluasi atas Piagam SKAI kepada Dewan Komisaris sebelum disetujui oleh Dewan Komisaris.
13. Melakukan kaji ulang (*review*) terhadap pelaksanaan tugas SKAI.

4. Regarding the implementation of audit services on the Bank's financial information conducted by the AP and/or KAP:
   a. Overseeing the implementation of audits and monitoring the findings of audits conducted by the AP and/or KAP.
   b. Ensuring that the AP and/or KAP promptly communicate significant matters/findings to the Audit Committee so that they can be conveyed to the Board of Commissioners.
   c. Ensuring the Bank's management follows up on the findings of the AP and/or KAP.
5. Providing an independent opinion in the event of a disagreement between the Bank's management and the AP and/or KAP regarding the services provided.
6. Evaluating the performance of audit services on annual historical financial information by the AP and/or KAP. the evaluation is conducted through:
   a. Evaluation of the compliance of the audit conducted by the AP and/or KAP with applicable audit standards.
   b. Adequacy of fieldwork time.
   c. Review of the scope of services provided and the adequacy of sampling. and
   d. Recommendations for improvements provided by the AP and/or KAP.
7. Monitoring and evaluating the planning and execution of audits by internal audit and overseeing the implementation of follow-up actions on audit findings to assess the adequacy of internal controls, including the adequacy of the financial reporting process.
8. Reviewing the implementation of follow-up actions by the Board of Directors regarding findings from the SKAI, public accountants, and the results of supervision by the Financial Services Authority.
9. Reviewing complaints related to the Bank's accounting and financial reporting processes.
10. Reviewing and providing recommendations to the Board of Commissioners regarding potential conflicts of interest at the Bank.
11. Providing recommendations to the Board of Commissioners regarding the appointment, replacement, and/or dismissal of the Head of the Bank's Internal Audit Unit (SKAI).
12. Evaluating and submitting the evaluation results of the SKAI Charter to the Board of Commissioners prior to its approval by the Board of Commissioners.
13. Reviewing the implementation of SKAI's duties.

14. Melakukan evaluasi rencana kerja tahunan SKAI Bank.
15. Memastikan SKAI bekerja secara independen dan menjunjung tinggi integritas dalam pelaksanaan tugas.
16. Memberikan rekomendasi kepada Dewan Komisaris terkait penyusunan rencana audit, dan ruang lingkup SKAI.
17. Memastikan efektivitas sistem pengendalian internal dengan cara antara lain:
    a. Mengidentifikasi kemungkinan adanya kelemahan dan/atau hambatan dalam pengendalian internal melalui pemeriksaan laporan dan/atau kerja sama dengan audit eksternal.
    b. Dengan segera melakukan pembahasan jika terhadap temuan dan hal- hal yang mengandung indikasi kelemahan dan/ atau hambatan dalam pengendalian internal, inefisiensi dalam kegiatan Bank, kekeliruan penerapan standar akuntansi dan pelanggaran terhadap peraturan perundang-undangan yang berlaku.
18. Memastikan manajemen Bank menciptakan budaya kerja yang mendorong setiap karyawan mematuhi kode etik Bank.
19. Menjaga kerahasiaan dokumen, data dan informasi Bank.
20. Melakukan tugas khusus dari Dewan Komisaris yang disampaikan dalam bentuk tertulis sepanjang tugas tersebut tidak bertentangan dengan peraturan perundang-undangan yang berlaku dan dalam rangka membantu tugas dan fungsi Dewan Komisaris dalam melakukan pengawasan sesuai dengan ketentuan Anggaran Dasar Bank dan peraturan perundang-undangan yang berlaku.

Rapat Komite Audit

Kebijakan pelaksanaan rapat Komite Audit ditetapkan sebagai berikut:

1. Rapat Komite Audit diselenggarakan sesuai dengan kebutuhan, paling sedikit 1 (satu) kali dalam 1 (satu) bulan.
2. Rapat dipimpin oleh Ketua Komite Audit. Dalam hal Ketua Komite Audit berhalangan hadir, rapat dipimpin oleh seorang anggota Komite yang dipilih oleh para anggota yang hadir.
3. Rapat Komite Audit dinyatakan sah dan dapat diselenggarakan apabila dihadiri oleh lebih dari 1/2 (satu per dua) jumlah anggota Komite Audit.

14. Evaluating the Bank's SKAI annual work plan.
15. Ensuring that SKAI operates independently and upholds integrity in the performance of its duties.
16. Providing recommendations to the Board of Commissioners regarding the preparation of the audit plan and the scope of SKAI.
17. Ensuring the effectiveness of the internal control system by:
    a. Identifying potential weaknesses and/or obstacles in internal controls through the review of reports and/or collaboration with external auditors.
    b. Promptly addressing findings and matters indicating weaknesses and/or obstacles in internal controls, inefficiencies in the Bank's operations, errors in the application of accounting standards, and violations of applicable laws and regulations.
18. Ensuring the Bank's management fosters a work culture that encourages every employee to comply with the Bank's code of ethics.
19. Maintain the confidentiality of the Bank's documents, data, and information.
20. Carrying out special tasks assigned by the Board of Commissioners in writing, provided that these tasks do not conflict with applicable laws and regulations and are intended to assist the Board of Commissioners in performing its oversight duties in accordance with the provisions of the Bank's Articles of Association and applicable laws and regulations.

Audit Committee Meetings

The Audit Committee meeting policies are as follows:

1. Audit Committee meetings are held as needed, at least once a month.
2. Meetings are chaired by the Chairmn of the Audit Committee. In the event the Chairman of the Audit Committee is unable to attend, the meeting is chaired by a member of the Committee selected by the attending members.
3. An Audit Committee meeting is deemed valid and may be convened if attended by more than 1/2 (half) of the Audit Committee members.

4. Keputusan rapat Komite Audit diambil berdasarkan musyawarah untuk mufakat. Apabila musyawarah mufakat tidak tercapai, keputusan ditetapkan berdasarkan suara terbanyak.

4. Decisions of the Audit Committee meeting are made by consensus. If consensus cannot be reached, decisions are made by majority vote.

Dalam hal terdapat Perbedaan Pendapat (*Dissenting Opinions*) pada rapat Komite Audit, perbedaan tersebut wajib dicantumkan secara jelas dalam risalah rapat, termasuk alasan yang mendasari perbedaan pendapat dimaksud.

In the event of Dissenting Opinions at an Audit Committee meeting, such differences must be clearly recorded in the meeting minutes, including the reasons underlying the dissenting opinions.

Sepanjang tahun 2025, Komite Audit telah menyelenggarakan empat belas (14) kali rapat, dengan tingkat kehadiran 100% oleh Ketua dan seluruh anggota Komite Audit. Rincian kehadiran rapat Komite Audit disajikan dalam tabel berikut:

Throughout 2025, the Audit Committee held fourteen (14) meetings, with 100% attendance by the Chairman and all members of the Audit Committee. Details of Audit Committee meeting attendance are presented in the following table:

Nama Name	**Jumlah Rapat** Total Meeting	**Jumlah Kehadiran** Total Attendance	**Kehadiran (%)** Percentage (%)
Pramoda Dei Sudarmo	14	14	100%
Johny Kandano	14	14	100%
Mahdan Ibrahim[1)]	8	8	100%
Jusuf Sukiman[2)]	6	6	100%

[1)] Menjabat hingga 4 Agustus 2025 [2)] Menjabat sejak 4 Agustus 2025
[1)] Serving until August 4, 2025 [2)] Serving since August 4, 2025

Pelaksanaan Kegiatan Kerja Komite Audit

Sepanjang tahun 2025, fokus pembahasan, kajian, dan diskusi Komite Audit mencakup beberapa aspek utama sebagai berikut:

1. Audit Eksternal
   a. Membahas hasil audit laporan keuangan Perseroan tahun 2024 serta mengevaluasi kesesuaian dengan standar akuntansi yang berlaku.
   b. Mengevaluasi pelaksanaan jasa audit atas laporan keuangan periode 31 Desember 2024, yang dilakukan oleh Kantor Akuntan Publik (KAP) Purwantono, Sungkoro & Surja (EY Indonesia) dan Yovita sebagai Akuntan Publik (AP).
   c. Memberikan rekomendasi kepada Dewan Komisaris atas penunjukan KAP dan AP untuk audit tahun buku 2025 berdasarkan hasil evaluasi dan berbagai pertimbangan yang relevan.
   d. Menelaah independensi, kinerja Akuntan Publik, besaran *fee* (imbalan jasa) audit dan kriteria lain dalam rangka memberikan rekomendasi kepada Dewan Komisaris untuk penunjukan AP/KAP.

Implementation of Audit Committee Activities

Throughout 2025, the Audit Committee's focus of agenda, review, and discussion covered the following key aspects:

1. External Audit
   a. Discussing the results of the audit of the Company's 2024 financial statements and evaluating compliance with applicable accounting standards.
   b. Evaluating the performance of audit services on the financial statements for the period ending December 31, 2024, conducted by the Public Accounting Firm (KAP) Purwantono, Sungkoro & Surja (EY Indonesia) and Yovita as the Public Accountant (AP).
   c. Providing recommendations to the Board of Commissioners regarding the appointment of the Public Accounting Firm (KAP) and Public Accountant (AP) for the 2025 fiscal year audit based on evaluation results and various relevant considerations.
   d. Reviewing the independence, performance of the Public Accountant, the amount of the audit fee, and other criteria in order to provide recommendations to the Board of Commissioners for the appointment of the AP/KAP.

e. Menilai kecukupan pemeriksaan Akuntan Publik untuk memastikan bahwa risiko-risiko utama telah dipertimbangkan dalam proses audit.
f. Memantau hasil temuan pemeriksaan auditor eksternal.

2. Satuan Kerja Audit Intern (SKAI)
a. Melakukan evaluasi terhadap rencana kerja tahunan Satuan Kerja Audit Intern (SKAI) serta memberikan masukan apabila diperlukan.
b. Melakukan pemantauan atas komitmen tindak lanjut temuan audit untuk menilai kecukupan pengendalian internal.
c. Mengkaji dan menyetujui atas Rencana Audit tahun 2025.
d. Memastikan bahwa temuan signifikan dari SKAI segera disampaikan kepada Komite Audit untuk dibahas lebih lanjut dan menjadi perhatian Dewan Komisaris.
e. Memberikan rekomendasi kepada Dewan Komisaris agar SKAI melakukan audit khusus apabila terdapat indikasi kecurangan atau penyimpangan terhadap peraturan perundang-undangan dan/atau kebijakan lain.
f. Menelaah Laporan Pelaksanaan dan Pokok-pokok Hasil Audit Intern yang akan disampaikan ke OJK.
g. Melakukan evaluasi terhadap efektivitas fungsi SKAI, dengan memastikan bahwa Manajemen melakukan tindak lanjut atas rekomendasi yang disampaikan SKAI.
h. Memberikan rekomendasi mengenai penggunaan pihak independen eksternal yang melakukan kaji ulang terhadap fungsi audit intern.

3. Kepatuhan dan Internal *Fraud*
a. Melakukan pemantauan terhadap komitmen tindak lanjut atas hasil temuan pengawasan OJK serta memberikan rekomendasi perbaikan yang diperlukan.
b. Mengkaji ketentuan baru yang berlaku beserta potensi dampaknya bagi Perseroan.
c. Memantau penerapan kepatuhan Perseroan dan Anti Pencucian Uang dan Pencegahan Pendanaan Teroris (APU-PPT).
d. Memantau kasus internal *fraud* dan melakukan evaluasi program penanggulangan *fraud.*

e. Assessing the adequacy of audits by Public Accountants to ensure that key risks have been considered in the audit process.
f. Monitoring the findings of external auditors.

2. Internal Audit Unit (SKAI)
a. Evaluating the annual work plan of the Internal Audit Unit (SKAI) and providing input as needed.
b. Monitoring the implementation of follow-up actions on audit findings to assess the adequacy of internal controls.
c. Reviewing and approving the 2025 Audit Plan.
d. Ensuring that significant findings from the Internal Audit Unit (SKAI) are promptly communicated to the Audit Committee for further discussion and brought to the attention of the Board of Commissioners.
e. Providing recommendations to the Board of Commissioners for SKAI to conduct a special audit if there are indications of fraud or violations of laws and regulations and/or other policies.
f. Reviewing the Implementation Report and Key Findings of the Internal Audit to be submitted to the OJK.
g. Evaluating the effectiveness of the SKAI's functions, ensuring that Management follows up on recommendations submitted by SKAI.
h. Providing recommendations regarding the use of external independent parties to review the internal audit function.

3. Compliance and Internal Fraud
a. Monitoring the commitment to follow up on the findings of OJK supervision and providing recommendations for necessary improvements.
b. Reviewing new applicable regulations and their potential impact on the Company.
c. Monitoring the Company's compliance with Anti-Money Laundering and Counter-Terrorist Financing (AML-CTF) requirements.
d. Monitoring internal fraud cases and evaluating fraud prevention programs.

Program Pengembangan Kompetensi Komite Audit

Dalam rangka mendukung pelaksanaan tugas dan tanggung jawab Komite Audit secara optimal, Perseroan memberikan kesempatan kepada seluruh anggota Komite Audit untuk mengikuti program pelatihan dan pengembangan kompetensi. Program tersebut diselenggarakan baik oleh internal Perseroan maupun oleh lembaga eksternal yang relevan.

Adapun program pengembangan kompetensi yang diikuti oleh anggota Komite Audit sepanjang tahun 2025 disajikan dalam tabel berikut:

Audit Committee Competency Development Program

To support the Audit Committee in optimally fulfilling its duties and responsibilities, the Company provides all Audit Committee members with the opportunity to participate in training and competency development programs. These programs are conducted both internally by the Company and by relevant external institutions.

The competency development programs attended by Audit Committee members throughout 2025 are presented in the following table:

Nama Name	**Program Pengembangan Kompetensi** Competency Development Program	**Penyelenggara** Organizer	**Tanggal** Date
Johny Kandano	Refreshment Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Refresher – Level 7	Bankers Association for Risk Management	10 November 2025 November 10, 2025
	Sertifikasi Fintech Fintech Certification	AFPI	15 - 18 Juni 2025 June 15-18, 2025
Jusuf Sukiman[1)]	Trust by Design: Privacy, Security, And AI Governance For The Future	ISACA	28 Oktober 2025 October 28, 2025
Mahdan Ibrahim[2)]	Program pengembangan kompetensi Mahdan Ibrahim dapat dilihat pada Bab Tata Kelola Perusahaan bagian Komite Pemantau Risiko dalam Laporan Tahunan ini. Mahdan Ibrahim's competency development program can be seen in the Corporate Governance Chapter of the Risk Oversight Committee section in this Annual Report.		
Pramoda Dei Sudarmo	Pelatihan dan pengembangan kompetensi Pramoda Dei Sudarmo dapat dilihat pada Bab Tinjauan Pendukung Bisnis bagian Sumber Daya Manusia dalam Laporan Tahunan ini. Pramoda Dei Sudarmo's training and competency development can be seen in the Business Support Overview chapter of the Human Resources section in this Annual Report.		

[1)] Menjabat sejak 4 Agustus 2025 [2)] Menjabat hingga 4 Agustus 2025
[1)] Serving until August 4, 2025 [2)] Serving since August 4, 2025

Komite Pemantau Risiko

Komite Pemantau Risiko merupakan komite yang dibentuk oleh dan bertanggung jawab kepada Dewan Komisaris untuk membantu pelaksanaan fungsi pengawasan, khususnya dalam memberikan rekomendasi kepada Direksi terkait penerapan manajemen risiko Perseroan. Peran ini bertujuan untuk memastikan bahwa kebijakan, prosedur, dan metodologi pengelolaan risiko telah memadai sehingga risiko Perseroan dapat dikelola dan dikendalikan sesuai dengan batasan atau *limit* yang ditetapkan.

Risk Oversight Committee

The Risk Oversight Committee is a committee established by and responsible to the Board of Commissioners to assist in the performance of supervisory functions, particularly in providing recommendations to the Board of Directors regarding the implementation of the Company's risk management. This role aims to ensure that risk management policies, procedures, and methodologies are adequate so that the Company's risks can be managed and controlled in accordance with established limits.

Pedoman dan Tata Tertib *(Charter)* Komite Pemantau Risiko

Komite Pemantau Risiko memiliki Pedoman dan Tata Tertib *(Charter)* yang mengatur, antara lain, struktur keanggotaan, tugas, tanggung jawab, kewenangan, mekanisme rapat, etika kerja, waktu kerja, serta masa jabatan. Pedoman tersebut ditinjau secara berkala untuk memastikan kesesuaiannya dengan ketentuan yang berlaku serta perkembangan kegiatan usaha Perseroan. Pedoman terakhir disetujui oleh Komite Pemantau Risiko pada bulan November 2023.

Risk Oversight Committee Charter

The Risk Oversight Committee Charter regulates the membership structure, duties, responsibilities, authority, meeting procedures, work ethics, working hours, and term of office. This charter is reviewed periodically to ensure its alignment with applicable regulations and the development of the Company's business activities. The latest charter was approved by the Risk Oversight Committee in November 2023.

Jumlah dan Komposisi Anggota Komite Pemantau Risiko

Mengacu pada Pedoman dan Tata Tertib Kerja Komite Pemantau Risiko serta peraturan perundang-undangan yang berlaku, susunan keanggotaan Komite Pemantau Risiko terdiri dari:

1. 1 (satu) Komisaris Independen;
2. 1 (satu) pihak independen yang memiliki keahlian di bidang keuangan atau akuntansi; dan
3. 1 (satu) pihak independen yang memiliki keahlian di bidang manajemen risiko.

Sepanjang tahun 2025, susunan dan komposisi Komite Pemantau Risiko tidak mengalami perubahan. Berdasarkan Surat Keputusan Direksi Nomor SKEP/153/SET/BNC/IX/2024 yang berlaku efektif sejak 4 September 2024, susunan Komite Pemantau Risiko adalah sebagai berikut:

Number and Composition of Risk Oversight Committee Members

In accordance with the Risk Oversight Committee Charter and applicable laws and regulations, the composition of the Risk Oversight Committee consists of:

1. 1 (one) Independent Commissioner;
1. 1 (one) independent party with expertise in finance or accounting; and

2. 1 (one) independent party with expertise in risk management.

Throughout 2025, the composition of the Risk Oversight Committee remained unchanged. Based on Board of Directors Decree No. SKEP/153/SET/BNC/IX/2024 effective as of September 4, 2024, the composition of the Risk Oversight Committee is as follows:

Nama Name	**Jabatan** Position	**Keterangan** Description
Inkawan D.Jusi	Ketua Komite Pemantau Risiko Chairman of Risk Oversight Committee	Komisaris Utama Independen Independent President Commissioner
Johny Kandano	Anggota Komite Pemantau Risiko Member of Risk Oversight Committee	Pihak Independen Independent Party
Mahdan Ibrahim	Anggota Komite Pemantau Risiko Member of Risk Oversight Committee	Pihak Independen Independent Party

Profil Komite Pemantau Risiko

Risk Oversight Committee Profile

Inkawan D. Jusi
Ketua Komite Pemantau Risiko
Chairman of Risk OversightCommittee

Profil lengkap Inkawan D. Jusi dapat dilihat pada Bab Profil Perusahaan bagian Dewan Komisaris dalam Laporan Tahunan ini.
Inkawan D. Jusi's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section in this Annual Report.

Johny Kandano
Anggota Komite Pemantau Risiko
Member of Risk OversightCommittee

Profil lengkap Johny Kandano dapat dilihat pada Bab Tata Kelola Perusahaan bagian Komite Audit dalam Laporan Tahunan ini.
Inkawan D. Jusi's complete profile can be found in the Corporate Governance Chapter, under the Audit Committee section in this Annual Report.

Mahdan Ibrahim
Anggota Komite Pemantau Risiko
Risk Oversight Committee Member

WNI, usia 63 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 63 years old, Indonesian Citizenship

Riwayat Pendidikan/Sertifikasi	• 2010 Magister Akuntansi, Fakultas Ekonomi dan Bisnis, Universitas Indonesia • 1987 Sarjana Akuntansi, Fakultas Ekonomi dan Bisnis, Universitas Indonesia • 2010 Master of Accounting, Faculty of Economics and Business, Universitas Indonesia • 1987 Bachelor of Accounting, Faculty of Economics and Business, Universitas Indonesia
Riwayat Pekerjaan Work Experience	• 2024 - 2025: Komite Audit PT Bank Neo Commerce Tbk • 2023 - 2024: Komisaris Utama PT MNC Finance • 2022 - 2024: Komisaris Utama PT MNC Guna Usaha Indonesia • 2022 - 2024: Direktur PT MNC Kapital Indonesia Tbk • 2022 - 2024: Komisaris PT Bank MNC Internasional Tbk. • 2019 - 2022: Presiden Direktur PT Bank MNC Internasional Tbk. • 2018 - 2019: Direktur Kepatuhan PT Bank MNC Internasional Tbk. • 2014 - 2018: Head of Internal Audit di PT Global Mediacom Tbk & PT MNC Investama Tbk. • 2010 - 2014: Direktur Legal, Compliance & Corporate Secretary PT Bank DBS Indonesia • 2008 - 2009: Direktur Kepatuhan Bank of Tokyo Mitsubishi UFJ Ltd. • 2024 - 2025: Audit Committee PT Bank Neo Commerce Tbk • 2023 - 2024: President Commissioner of PT MNC Finance • 2022 - 2024: President Commissioner of PT MNC Guna Usaha Indonesia • 2022 - 2024: Commissioner of PT Bank MNC Internasional Tbk. • 2019 - 2022: President Director of PT Bank MNC Internasional Tbk. • 2018 - 2019: Compliance Director of PT Bank MNC Internasional Tbk. • 2014 - 2018: Head of Internal Audit of PT Global Mediacom Tbk & PT MNC Investama Tbk • 2010 - 2014: Compliance Director of PT Bank DBS Indonesia • 2008 - 2009: Compliance Director of Bank of Tokyo Mitsubishi UFJ Ltd
Jabatan Lainnya Other Position	Tidak Ada None
Dasar Hukum Pengangkatan Legal Basis for Appointment	Surat Keputusan Direksi No. SKEP/219/SET/BNC/XII/2024 tanggal 18 Desember 2024. Director Decision Letter No. SKEP/219/SET/BNC/XII/2024 Date December 18, 2024
Hubungan Afiliasi Affiliated Relationship	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris lainnya, anggota Direksi ataupun pemegang saham pengendali. No affiliation with other members of the Board of Commissioners, members of the Board of Directors or controlling shareholders.
Periode Jabatan Term of Office	Desember 2024 sekarang December 2024 until now

Independensi Komite Pemantau Risiko

Seluruh anggota Komite Pemantau Risiko berasal dari pihak independen dan tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan Dewan Komisaris, Direksi, maupun Pemegang Saham Pengendali, serta tidak memiliki hubungan lain dengan Perseroan yang dapat mempengaruhi independensinya. Selain itu, anggota Komite Pemantau Risiko yang berasal dari pihak independen tidak berasal dari mantan anggota Direksi atau pejabat eksekutif dari bank yang sama.

Tugas dan Tanggung Jawab Komite Pemantau Risiko

Tugas dan tanggung jawab Komite Pemantau Risiko meliputi antara lain:

1. Komite bekerja secara kolektif dalam melaksanakan tugasnya untuk membantu Dewan Komisaris dalam menjalankan fungsi pengawasan yang efektif terhadap Direksi dalam mengelola Bank menerapkan prinsip-prinsip GCG, dan dalam penerapan manajemen risiko dengan memberikan pendapat profesional terhadap laporan atau hal-hal yang disampaikan Direksi kepada Dewan Komisaris serta mengidentifikasi hal-hal yang memerlukan perhatian Dewan Komisaris.
2. Memberikan pendapat profesional yang independen kepada Dewan Komisaris terhadap laporan atau hal-hal terkait pengelolaan risiko yang disampaikan oleh Direksi kepada Dewan Komisaris serta mengidentifikasi hal-hal yang memerlukan perhatian Dewan Komisaris.
3. Evaluasi tentang kesesuaian antara kebijakan Manajemen Risiko dengan pelaksanaan kebijakan tersebut.
4. Pemantauan dan evaluasi pelaksanaan tugas Komite Manajemen Risiko dan Satuan Kerja Manajemen Risiko, untuk memberikan rekomendasi kepada Dewan Komisaris.
5. Mengkaji dan/atau memberikan rekomendasi kepada Dewan Komisaris terkait *Risk Appetite Statement* (RAS), *Risk Tolerance*, dan parameternya.
6. Melakukan evaluasi atas laporan *self-assessment* penerapan tata kelola.
7. Melakukan tinjauan atas pelaksanaan manajemen risiko terintegrasi yang terdiri dari laporan profil risiko Bank, laporan tingkat kesehatan Bank berbasis risiko, serta laporan lainnya terkait dengan jenis risiko.

Independency of the Risk Oversight Committee

All members of the Risk Oversight Committee are independent parties who have no financial, managerial, shareholding, and/or family relationships with the Board of Commissioners, the Board of Directors, or the Controlling Shareholders, nor do they have any other relationships with the Company that could affect their independency. Furthermore, independent members of the Risk Oversight Committee must not be former members of the Board of Directors or executive officers of the same bank.

Duties and Responsibilities of the Risk Oversight Committee

The duties and responsibilities of the Risk Oversight Committee are as follows:

1. The Committee works collectively in performing its duties to assist the Board of Commissioners in carrying out effective oversight of the Board of Directors in managing the Bank based on GCG principles, and in the implementation of risk management by providing professional opinions on reports or matters submitted by the Board of Directors to the Board of Commissioners and identifying matters requiring the Board of Commissioners' attention.
2. Providing independent professional opinions to the Board of Commissioners regarding reports or matters related to risk management submitted by the Board of Directors to the Board of Commissioners, as well as identifying matters requiring the Board of Commissioners' attention.
3. Evaluating the alignment between risk management policies and the implementation of such policies.
4. Monitoring and evaluating the performance of the Risk Management Committee and the Risk Management Unit to provide recommendations to the Board of Commissioners.
5. Reviewing and/or providing recommendations to the Board of Commissioners regarding the Risk Appetite Statement (RAS), Risk Tolerance, and their parameters.
6. Evaluating the self-assessment report on the implementation of corporate governance.
7. Reviewing the implementation of integrated risk management, which includes the Bank's risk profile report, the Bank's risk-based health report, and other reports related to specific risk types.

8. Menyusun, mengkaji dan/atau memperbaharui Piagam Komite secara periodik sesuai dengan ketentuan yang berlaku.
9. Membantu pelaksanaan tugas Dewan Komisaris dalam memelihara dan memantau Tingkat Kesehatan Bank (*Risk Based Bank Rating*/RBBR) serta mengambil langkah-langkah yang diperlukan untuk memelihara dan/atau meningkatkan Tingkat Kesehatan Bank.
10. Melakukan pemberdayaan fungsi manajemen risiko Bank.
11. Melakukan tugas-tugas lain selain disebutkan di atas yang diberikan oleh Dewan Komisaris kepada Komite sesuai dengan tugas dan fungsinya dari waktu ke waktu sesuai dengan kebutuhan Bank.

Rapat Komite Pemantau Risiko

Kebijakan pelaksanaan rapat Komite Pemantau Risiko ditetapkan sebagai berikut:
1. Komite Pemantau Risiko menyelenggarakan rapat secara berkala sekurang-kurangnya 1 (satu) kali dalam 1 (satu) bulan, serta dapat mengadakan rapat sewaktu-waktu apabila diperlukan.
2. Rapat dipimpin oleh Ketua Komite Pemantau Risiko. Apabila Ketua berhalangan hadir, maka rapat dipimpin oleh seorang anggota Komite yang dipilih oleh para anggota yang hadir.
3. Kuorum rapat dinyatakan terpenuhi apabila dihadiri oleh lebih dari 1/2 (satu per dua) jumlah anggota Komite Pemantau Risiko.
4. Keputusan rapat diambil berdasarkan musyawarah mufakat. Apabila mufakat tidak tercapai, keputusan ditetapkan berdasarkan suara terbanyak dan dinyatakan sah apabila disetujui oleh lebih dari 1/2 (satu per dua) jumlah anggota Komite yang aktif.
5. Setiap perbedaan pendapat (*dissenting opinions*) yang terjadi dalam rapat Komite wajib dicantumkan secara jelas dalam risalah rapat, berikut alasan yang melatarbelakanginya.

Sepanjang tahun 2025, Komite Pemantau Risiko telah menyelenggarakan 12 (dua belas) kali rapat, dengan tingkat kehadiran penuh dari Ketua dan seluruh anggota. Rincian kehadiran rapat Komite Pemantau Risiko disajikan dalam tabel berikut:

8. Drafting, reviewing, and/or updating the Committee Charter periodically in accordance with applicable regulations.
9. Assisting the Board of Commissioners in maintaining and monitoring the Bank's Health Level (Risk-Based Bank Rating/RBBR) and taking necessary steps to maintain and/or improve the Bank's Health Level.
10. Enhancing the Bank's risk management functions.
11. Performing other duties not mentioned above that are assigned by the Board of Commissioners to the Committee in accordance with its duties and functions from time to time as needed by the Bank.

Risk Oversight Committee Meetings

The policy on the implementation of Risk Oversight Committee meetings is as follows:
1. The Risk Oversight Committee holds meetings periodically at least once a month and may convene meetings at any time as needed.
2. Meetings are chaired by the Chairman of the Risk Oversight Committee. If the Chairman is unable to attend, the meeting is chaired by a Committee member selected by the attending members.
3. Quorum is met if more than 1/2 (half) of the Risk Oversight Committee members are present.
4. Meeting decisions are made by consensus. If consensus cannot be reached, decisions are made by majority vote and are valid if approved by more than 1/2 (half) of the active Committee members.
5. Any dissenting opinions arising during Committee meetings must be clearly recorded in the meeting minutes, along with the reasons behind them.

Throughout 2025, the Risk Oversight Committee held 12 (twelve) meetings, with full attendance by the Chairman and all members. Details of attendance at Risk Oversight Committee meetings are presented in the following table:

Nama Name	**Jumlah Rapat** Total Meeting	**Jumlah Kehadiran** Total Attendance	**Kehadiran (%)** Percentage (%)
Inkawan D.Jusi	12	12	100%
Johny Kandano	12	12	100%
Mahdan Ibrahim	12	12	100%

Pelaksanaan Kegiatan Kerja Komite Pemantau Risiko

Sepanjang tahun 2025, Komite Pemantau Risiko secara aktif melakukan pembahasan dan diskusi yang berfokus pada penguatan fungsi pengawasan risiko Perseroan, dengan cakupan sebagai berikut:

1. Memantau perkembangan perekonomian global, domestik, perbankan, perubahan peraturan dan lingkungan usaha pada umumnya dan mengevaluasi pengaruhnya terhadap pengelolaan risiko bank/ Perseroan.
2. Melakukan *review* dan pembahasan terhadap pelaksanaan fungsi manajemen risiko yang meliputi antara lain laporan profil risiko dan laporan lainnya terkait dengan jenis risiko melalui Rapat Komite Pemantau Risiko (KPR) yang dilakukan minimal 1 (satu) kali dalam 1 (satu) bulan.
3. Memberikan masukan terhadap mitigasi risiko yang harus dilakukan oleh Perseroan yang tidak terbatas kepada pemantauan atas 8 (delapan) risiko.
4. Mengevaluasi *stress testing* yang dilakukan oleh Perseroan baik sebagai upaya monitoring Perseroan atau pun upaya Perseroan dalam memitigasi risiko yang muncul khususnya terhadap kredit, pasar, likuiditas dan permodalan Perseroan.
5. Memberikan masukan atas upaya tindak lanjut Perseroan terhadap temuan-temuan OJK terkait pengelolaan manajemen risiko.
6. Memantau dan mengevaluasi terhadap tugas Komite Manajemen Risiko dan unit Manajemen Risiko terkait penetapan dan pemantauan risiko yang meliputi 8 (delapan) risiko.

Program Pengembangan Kompetensi Komite Pemantau Risiko

Dalam rangka mendukung efektivitas pelaksanaan tugas dan tanggung jawab Komite Pemantau Risiko, Perseroan memberikan kesempatan kepada anggota Komite Pemantau Risiko untuk mengikuti program pelatihan dan pengembangan kompetensi. Program tersebut diselenggarakan baik oleh internal Bank maupun oleh pihak eksternal yang relevan.

Adapun program pengembangan kompetensi yang diikuti oleh anggota Komite Pemantau Risiko sepanjang tahun 2025 disajikan dalam tabel berikut:

Implementation of the Risk Oversight Committee's Activities

Throughout 2025, the Risk Oversight Committee actively engaged in discussions that focused on strengthening the Company's risk oversight functions, with the following scope:

1. Monitoring developments in the global and domestic economies, the banking sector, regulatory changes, and the business environment in general, and evaluating their impact on the Bank's/Company's risk management.
2. Reviewing and discussing the implementation of risk management functions, including risk profile reports and other reports related to specific risks, through Risk Oversight Committee (KPR) meetings held at least once a month.
3. Providing input on risk mitigation measures to be implemented by the Company, which are not limited to monitoring the 8 (eight) risks.
4. Evaluating the stress testing conducted by the Company, whether as part of the Company's monitoring efforts or its efforts to mitigate emerging risks, particularly regarding the Company's credit, market, liquidity, and capital risks.
5. Providing input on the Company's follow-up actions regarding OJK findings related to risk management.
6. Monitoring and evaluating the tasks of the Risk Management Committee and the Risk Management unit regarding the identification and monitoring of risks, which encompass 8 (eight) risk categories.

Risk Oversight Committee Competency Development Program

To support the effectiveness of the Risk Oversight Committee's duties and responsibilities, the Company provides members of the Risk Oversight Committee with opportunities to participate in training and competency development programs. These programs are provided by both internal Bank resources and relevant external parties.

The competency development programs attended by members of the Risk Oversight Committee throughout 2025 are presented in the following table:

Nama Name	Program Pengembangan Kompetensi Competency Development Program	Penyelenggara Organizer	Tanggal Date
Mahdan Ibrahim	*Refreshment* Sertifikasi Manajemen Risiko Jenjang 7 Risk Management Certification Refresher – Level 7	Maisa Edukasi	2 Mei 2025 May 2, 2025
Inkawan D.Jusi	Program pengembangan kompetensi dapat dilihat pada Bab Tinjauan Pendukung Bisnis bagian Sumber Daya Manusia dalam Laporan Tahunan ini. The competency development program can be seen in the Business Support Overview chapter of the Human Resources section in this Annual Report.		
Johny Kandano	Program pengembangan kompetensi Johny Kandano dapat dilihat pada Bab Tata Kelola Perusahaan bagian Komite Audit dalam Laporan Tahunan ini. Johny Kandano's competency development program can be seen in the Corporate Governance Chapter of the Audit Committee section in this Annual Report.		

Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi merupakan komite yang dibentuk oleh dan bertanggung jawab kepada Dewan Komisaris. Komite ini berperan membantu Dewan Komisaris dalam melaksanakan tugas dan tanggung jawab terkait pemberian rekomendasi mengenai nominasi dan remunerasi anggota Dewan Komisaris, Direksi, serta anggota komite di tingkat Dewan Komisaris. Selain itu, Komite juga memberikan rekomendasi atas kerangka remunerasi Pejabat Eksekutif dan pegawai secara keseluruhan, dengan tetap mengacu pada prinsip-prinsip *Good Corporate Governance*.

Pedoman dan Tata Tertib *(Charter)* Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi memiliki Pedoman dan Tata Tertib (*Charter*) yang mengatur antara lain komposisi, struktur, dan keanggotaan, tugas, tanggung jawab dan wewenang, mekanisme rapat, etika kerja, serta masa jabatan. Pedoman tersebut ditinjau secara berkala guna memastikan kesesuaiannya dengan ketentuan yang berlaku serta perkembangan kegiatan usaha Perseroan. Pedoman terakhir disetujui oleh anggota Komite Nominasi dan Remunerasi pada bulan Mei 2024.

Jumlah dan Komposisi Anggota Komite Nominasi dan Remunerasi

Komite Nominasi dan Remunerasi dipimpin oleh 1 (satu) orang Komisaris Independen, serta memiliki 2 (dua) anggota yang terdiri dari seorang Komisaris dan seorang pejabat eksekutif yang membawahi fungsi Sumber Daya Manusia.

Nomination and Remuneration Committee

The Nomination and Remuneration Committee is a committee established by and responsible to the Board of Commissioners. This committee assists the Board of Commissioners in carrying out its duties and responsibilities regarding the provision of recommendations on the nomination and remuneration of members of the Board of Commissioners, the Board of Directors, and members of committees under the Board of Commissioners. In addition, the Committee also provides recommendations on the remuneration framework for Executive Officers and employees as a whole, while adhering to the principles of Good Corporate Governance.

Nomination and Remuneration Committee Charter

The Nomination and Remuneration Committee has a Charter that stipulates its composition, structure and membership, duties, responsibilities and authority, meeting procedures, work ethics, as well as terms of office. This Charter is reviewed periodically to ensure its alignment with applicable regulations and the Company's business developments. The latest Charter was approved by the members of the Nomination and Remuneration Committee in May 2024.

Number and Composition of Nomination and Remuneration Committee Members

The Nomination and Remuneration Committee is chaired by 1 (one) Independent Commissioner and consists of 2 (two) members, comprising one Commissioner and one executive officer overseeing the Human Resources function.

Sepanjang tahun 2025, susunan dan komposisi anggota Komite Nominasi dan Remunerasi Perseroan mengalami beberapa perubahan, dengan rincian sebagai berikut:

Throughout 2025, the composition of the Company's Nomination and Remuneration Committee underwent several changes, as detailed below:

No	Surat Keputusan Direksi Board of Directors Decree	Tanggal Efektif SK Decree Effective Date	Ketua Chair	Anggota Member	Sekretaris Merangkap Anggota Member Secretary
1	SKEP/146A/SET/BNC/VIII/2024	27 Agustus 2024 August 27, 2024	Inkawan D. Jusi	Pramoda Dei Sudarmo	*Head of Human Resources*
2	SKEP/005/SET/BNC/I/2025	10 Januari 2025 January 10, 2025	Inkawan D. Jusi	Kreisna D. Gozali	*Head of Human Resources*

Dengan demikian, susunan dan komposisi anggota Komite Nominasi dan Remunerasi Perseroan per 31 Desember 2025 adalah sebagai berikut:

Therefore, the structure and composition of the Company's Nomination and Remuneration Committee as of December 31, 2025 are as follows:

Nama Name	Jabatan Position
Inkawan D. Jusi	Ketua Komite Nominasi dan Remunerasi Chairman of the Nomination and Remuneration Committee
Kreisna D. Gozali	Anggota Member
Agustina Nidya Trimastuti R. D Head of Human Resources	Sekretaris merangkap Anggota Secretary and Member

Profil Komite Nominasi dan Remunerasi

Nomination and Remuneration Committee Profile

Inkawan D. Jusi
Ketua Komite Nominasi dan Remunerasi
Chairman of Nomination and Remuneration Committee

Profil lengkap Inkawan D. Jusi dapat dilihat pada Bab Profil Perusahaan bagian Dewan Komisaris dalam Laporan Tahunan ini.
Inkawan D. Jusi's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Pramoda Dei Sudarmo
Anggota Komite Nominasi dan Remunerasi
Member of Nomination and Remuneration Committee

Profil lengkap Pramoda Dei Sudarmo dapat dilihat pada Bab Profil Perusahaan bagian Dewan Komisaris dalam Laporan Tahunan ini.
Pramoda Dei Sudarmo's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Kreisna Dewantara Gozali
Anggota Komite Nominasi dan Remunerasi
Member of Nomination and Remuneration Committee

Profil lengkap Kreisna Dewantara Gozali dapat dilihat pada Bab Profil Perusahaan bagian Dewan Komisaris dalam Laporan Tahunan ini.
Kreisna Dewantara Gozali's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Agustina Nidya Trimastuti R. D
Head of Human Resources merangkap Sekretaris dan Anggota Komite Nominasi dan Remunerasi
Head of Human Resources concurrently Secretary and Member of Nomination and Remuneration Committee

WNI, usia 47 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 47 years old, Indonesian Citizens

Riwayat Pendidikan/ Sertifikasi Educational Background/ Certification	2021 Deakin University (Magister Commerce) 1996 Unika Atmajaya (Sarjana Psikologi) 2021 Deakin University (Master of Commerce) 1996 Unika Atmajaya (Bachelor of Psychology)
Riwayat Pekerjaan dan Rangkap Jabatan Work Experience and Dual Position	Bergabung di PT Bank Neo Commerce Tbk sejak 26 Agustus 2024 dengan lebih dari 15 tahun pengalaman dalam bidang Sumber Daya Manusia, dan 11 tahun diantaranya di industri keuangan & perbankan. Sebelum bergabung di PT Bank Neo Commerce, beliau memiliki pengalaman sebagai HR Compensation & Benefit di British American Tobacco dan Assistant Manager Benefit & Administration, Manager HR Talent Management, Manager HR RM di PT Bank Ekonomi Raharja dan SNC – Lavalin, AVP HR BRCM (Business Support), VP HR BRCM (Business Support), VP HR Performance & Reward di HSBC dan VP Human Resources di Cermati She joined PT Bank Neo Commerce Tbk since August 26, 2024 with more than 15 years of experience in Human Resources, and 11 years of which in the financial & banking industry. Before joining PT Bank Neo Commerce, she has experience as HR Compensation & Benefit at British American Tobacco and Assistant Manager Benefit & Administration, Manager HR Talent Management, Manager HR RM at PT Bank Ekonomi Raharja and SNC Lavalin, AVP HR BRCM (Business Support), VP HR BRCM (Business Support), VP HR Performance & Reward at HSBC and VP Human Resources at Cermati.

Independensi Komite Nominasi dan Remunerasi

Seluruh anggota Komite Nominasi dan Remunerasi yang berasal dari pihak independen tidak memiliki hubungan keuangan, kepengurusan, kepemilikan saham, dan/atau hubungan keluarga dengan Dewan Komisaris, Direksi, dan/atau Pemegang Saham Pengendali, serta tidak memiliki hubungan lain dengan Bank yang dapat mempengaruhi kemampuan mereka untuk bertindak secara independen.

Independency of the Nomination and Remuneration Committee

All members of the Nomination and Remuneration Committee who are from independent parties have no financial, managerial, shareholding, and/or family ties with the Board of Commissioners, the Board of Directors, and/or Controlling Shareholders, nor do they have any other relationship with the Bank that could affect their ability to act independently.

Tugas dan Tanggung Jawab Komite Nominasi dan Remunerasi

Terkait Kebijakan Remunerasi

Dalam pelaksanaan kebijakan remunerasi, tugas Komite Nominasi dan Remunerasi meliputi:

1. Membantu dan memberikan rekomendasi kepada Dewan Komisaris dalam melakukan evaluasi dan penetapan mengenai:
   a. Struktur, kebijakan, dan besaran remunerasi bagi Dewan Komisaris dan Direksi untuk disampaikan kepada Rapat Umum Pemegang Saham (RUPS).
   b. Struktur, kebijakan, dan besaran remunerasi bagi pejabat eksekutif dan pegawai secara keseluruhan untuk disampaikan kepada Direksi melalui Dewan Komisaris.
2. Membantu Dewan Komisaris dalam melakukan penilaian kinerja serta kesesuaian antara remunerasi yang diterima dengan kinerja masingmasing anggota Direksi dan/atau Dewan Komisaris.
3. Dalam memberikan rekomendasi remunerasi, Komite Nominasi dan Remunerasi memperhatikan faktor-faktor berikut:
   a. Kinerja keuangan Perseroan dan kecukupan pemenuhan cadangan.
   b. Prestasi kerja individu.
   c. Kewajaran remunerasi dibandingkan dengan *peer group*.
   d. Keselarasan dengan sasaran dan strategi jangka panjang Perseroan.
   e. Keseimbangan antara komponen remunerasi yang bersifat tetap dan variabel.
   f. Struktur, kebijakan, dan besaran remunerasi sebagaimana dimaksud diatas dievaluasi oleh Komite Nominasi dan Remunerasi sekurangkurangnya 1 (satu) kali dalam 1 (satu) tahun.

Terkait Kebijakan Nominasi

Dalam pelaksanaan kebijakan nominasi, tugas Komite Nominasi dan Remunerasi meliputi:

1. Menyusun kebijakan, sistem, dan prosedur pemilihan dan/atau penggantian anggota Dewan Komisaris dan Direksi untuk disampaikan kepada RUPS.

Duties and Responsibilities of the Nomination and Remuneration Committee

Regarding Remuneration Policy

In implementing the remuneration policy, the duties of the Nomination and Remuneration Committee include:

1. Assisting and providing recommendations to the Board of Commissioners in evaluating and determining:
   a. The structure, policies, and amount of remuneration for the Board of Commissioners and the Board of Directors to be submitted to the General Meeting of Shareholders (GMS).
   b. The structure, policies, and amount of remuneration for executive officers and employees as a whole to be submitted to the Board of Directors through the Board of Commissioners.
2. Assisting the Board of Commissioners in assessing performance and the alignment between the remuneration received and the performance of each member of the Board of Directors and/or the Board of Commissioners.
3. In providing remuneration recommendations, the Nomination and Remuneration Committee considers the following factors:
   a. The Company's financial performance and the adequacy of reserves.
   b. Individual work performance.
   c. The appropriateness of remuneration compared to the peer group.
   d. Alignment with the Company's long-term objectives and strategies.
   e. The balance between fixed and variable remuneration components.
   f. The structure, policies, and levels of remuneration referred to above are evaluated by the Nomination and Remuneration Committee at least once a year.

Regarding the Nomination Policy

In implementing the nomination policy, the duties of the Nomination and Remuneration Committee include:

1. Formulating policies, systems, and procedures for the selection and/or replacement of members of the Board of Commissioners and the Board of Directors to be submitted to the General Meeting of Shareholders.

2. Memberikan rekomendasi kepada Dewan Komisaris mengenai:
   a. Komposisi jabatan anggota Direksi dan Dewan Komisaris;
   b. Kebijakan dan kriteria yang diperlukan dalam proses nominasi;
   c. Kebijakan evaluasi kinerja bagi anggota Direksi dan Dewan Komisaris.

3. Membantu Dewan Komisaris dalam melakukan penilaian kinerja anggota Direksi dan/atau Dewan Komisaris berdasarkan tolok ukur yang telah ditetapkan sebagai bahan evaluasi.

4. Menelaah dan mengusulkan calon yang memenuhi persyaratan sebagai anggota Direksi dan/atau Dewan Komisaris untuk disampaikan kepada RUPS.
5. Memberikan rekomendasi mengenai pihak independen yang akan ditetapkan sebagai:
   a. Anggota Komite Audit yang memiliki keahlian di bidang hukum/perbankan.
   b. Anggota Komite Pemantau Risiko, yang memiliki keahlian di bidang keuangan dan di bidang manajemen risiko.

Rapat Komite Nominasi dan Remunerasi

Pelaksanaan rapat Komite Nominasi dan Remunerasi mengacu pada kebijakan sebagai berikut:

1. Komite Nominasi dan Remunerasi menyelenggarakan rapat secara rutin paling sedikit 1 (satu) kali dalam jangka waktu 3 (tiga) bulan. Selain itu, rapat dapat dilaksanakan sewaktu-waktu apabila dipandang perlu untuk mendukung efektivitas pelaksanaan tugas.
2. Setiap rapat Komite Nominasi dan Remunerasi dipimpin langsung oleh Ketua Komite.

3. Rapat dinyatakan sah dan dapat dilaksanakan apabila dihadiri oleh mayoritas anggota Komite, termasuk paling sedikit 1 (satu) orang Komisaris Independen serta 1 (satu) orang Pejabat Eksekutif yang membawahi fungsi sumber daya manusia atau 1 (satu) orang perwakilan Pegawai Bank.
4. Pengambilan keputusan dalam rapat Komite dilakukan berdasarkan prinsip musyawarah untuk mufakat. Apabila mufakat tidak tercapai, keputusan ditetapkan melalui mekanisme pemungutan suara dengan suara terbanyak.
5. Setiap perbedaan pendapat (*dissenting opinions*) yang muncul dalam rapat Komite wajib dicatat secara jelas dalam risalah rapat, termasuk penjelasan atas dasar dan alasan perbedaan pendapat tersebut.

2. Providing recommendations to the Board of Commissioners regarding:
   a. The composition of positions on the Board of Directors and the Board of Commissioners;
   b. Policies and criteria required in the nomination process;
   c. Performance evaluation policies for members of the Board of Directors and the Board of Commissioners.
3. Assisting the Board of Commissioners in conducting performance evaluations of members of the Board of Directors and/or the Board of Commissioners based on established benchmarks as evaluation criteria.
4. Reviewing and proposing candidates who meet the requirements as members of the Board of Directors and/or the Board of Commissioners to be submitted to the GMS.
5. Providing recommendations regarding independent parties to be appointed as:
   a. Members of the Audit Committee with expertise in law/banking.
   b. Members of the Risk Oversight Committee with expertise in finance and risk management.

Nomination and Remuneration Committee Meetings

The Nomination and Remuneration Committee holds meetings based on the following policies:

1. The Nomination and Remuneration Committee holds regular meetings at least once every three months. Additionally, meetings may be held at any time if deemed necessary to support the effective performance of duties.

2. Each meeting of the Nomination and Remuneration Committee is chaired directly by the Committee Chairman.
3. A meeting is deemed valid and may be held if attended by a majority of Committee members, including at least 1 (one) Independent Commissioner and 1 (one) Executive Officer overseeing human resources functions or 1 (one) representative of Bank Employees.

4. Decision-making in Committee meetings is based on the principle of deliberation to reach consensus. If consensus is not reached, decisions are made through a majority vote.

5. Any dissenting opinions arising during Committee meetings must be clearly recorded in the meeting minutes, including an explanation of the basis and reasons for such dissenting opinions.

Sepanjang tahun 2025, Komite Nominasi dan Remunerasi telah menyelenggarakan 8 (delapan) kali rapat. Rincian tingkat kehadiran rapat Komite Nominasi dan Remunerasi disajikan pada tabel berikut:

Throughout 2025, the Nomination and Remuneration Committee held 8 (eight) meetings. Details of the attendance rate at the Nomination and Remuneration Committee meetings are presented in the following table:

Nama Name	Jumlah Rapat Total Meeting	Jumlah Kehadiran Total Attendance	Kehadiran (%) Percentage (%)
Inkawan D. Jusi	8	8	100%
Kreisna Dewantara Gozali[1)]	8	8	100%
Agustina Nidya Trimastuti R. D	8	8	100%
Pramoda Dei Sudarmo[2)]	-	-	-

[1)] Anggota Komite Nominasi dan Remunerasi sejak 10 Januari 2025
[2)] Anggota Komite Nominasi dan Remunerasi sampai dengan 10 Januari 2025
[1)] Member of the Nomination and Remuneration since January 10, 2025
[2)] Member of the Nomination and Remuneration until January 10, 2025

Pelaksanaan Kegiatan Kerja Komite Nominasi dan Remunerasi

Fokus pembahasan, kajian, serta diskusi yang dilakukan oleh Komite Nominasi dan Remunerasi sepanjang tahun 2025 mencakup beberapa aspek utama sebagai berikut:

1. Pencalonan Direktur Teknologi Sistem Informasi
2. Pembahasan terkait penyesuaian remunerasi Bank.
3. Proses nominasi Komite serta *executive hiring*.

Program Pengembangan Kompetensi Komite Nominasi dan Remunerasi

Dalam rangka mendukung pelaksanaan tugas dan tanggung jawab Komite Nominasi dan Remunerasi secara optimal, Perseroan memberikan kesempatan kepada seluruh anggota Komite untuk mengikuti berbagai program pelatihan dan pengembangan kompetensi. Program tersebut diselenggarakan baik oleh internal Perseroan maupun oleh lembaga eksternal yang relevan.

Adapun program pengembangan kompetensi yang diikuti oleh Komite Nominasi dan Remunerasi selama tahun 2025 adalah sebagai berikut:

Implementation of the Nomination and Remuneration Committee's Activities

The focus of the agenda, reviews, and discussions conducted by the Nomination and Remuneration Committee throughout 2025 covers the following key aspects:

1. Nomination of the Director of Information System Technology
2. Discussion regarding adjustments to the Bank's remuneration.
3. The Committee's nomination process and executive hiring.

Nomination and Remuneration Committee Competency Development Program

For an optimal fulfillment of the Nomination and Remuneration Committee's duties and responsibilities, the Company provides all Committee members with the opportunity to participate in various training and competency development programs. These programs are held both internally by the Company and by relevant external institutions.

The competency development programs attended by the Nomination and Remuneration Committee during 2025 are as follows:

Inkawan D. Jusi
Ketua Komite Nominasi dan Remunerasi
Chairman of Nomination and Remuneration Committee

Program pengembangan kompetensi dapat dilihat pada Bab Tinjauan Pendukung Bisnis bagian Sumber Daya Manusia dalam Laporan Tahunan ini.
Inkawan D. Jusi's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Pramoda Dei Sudarmo
Anggota Komite Nominasi dan Remunerasi
Member of Nomination and Remuneration Committee

Program pengembangan kompetensi dapat dilihat pada Bab Tinjauan Pendukung Bisnis bagian Sumber Daya Manusia dalam Laporan Tahunan ini.
Pramoda Dei Sudarmo's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Kreisna Dewantara Gozali
Anggota Komite Nominasi dan Remunerasi
Member of Nomination and Remuneration Committee

Program pengembangan kompetensi dapat dilihat pada Bab Tinjauan Pendukung Bisnis bagian Sumber Daya Manusia dalam Laporan Tahunan ini.
Kreisna Dewantara Gozali's complete profile can be found in the Company Profile Chapter, under the Board of Commissioners section of this Annual Report.

Agustina Nidya Trimastuti R. D

Head of Human Resources merangkap Sekretaris dan Anggota Komite Nominasi dan Remunerasi
Head of Human Resources, concurrently serves as Secretary and Member of the Nomination and Remuneration Committee

Program Pengembangan Kompetensi Competency Development Program	**Penyelenggara** Organizer	**Tanggal** Date
Leadership communication BNC 35th anniversary	Internal Bank	9 Januari 2025 January 9, 2025
Leadership Training Balance Score Card Offsite Meeting	Internal Bank	31 Januari & 1 Februari 2025 January 31 & February 1, 2025
Pembekalan Sertifikasi Manajemen Risiko Jenjang 5 Level 5 Risk Management Certification Training	Maisa Edukasi	12-13 Februari 2025 February 12-13, 2025
Leadership communication Town Hall BNC 2025	Internal Bank	10 April 2025 April 10, 2025
Socialization ISMS Awareness based on ISO/IEC 27001:2022	Premysis Consulting	28 April 2025 April 28, 2025
Training mandatory: Business Continuity Plan (BCP) Batch 10	Internal Bank	12 Juni 2025 June 12, 2025
Pemantapan Sertifikasi Manajemen Risiko Jenjang 5 Level 5 Risk Management Certification Refresher Course	Maisa Edukasi	19 Juni 2025 June 19, 2025
Ujian Sertifikasi Manajemen Risiko Jenjang 5 Level 5 Risk Management Certification	LSP LSPP	10 Juli 2025 July 10, 2025
Training Mandatory: Cyber Security Awareness Batch 4	Internal Bank	22 Juli 2025 July 22, 2025
Leadership Training BNC Offsite Meeting 2H 2025	Internal Bank	7-8 Agustus 2025 August 7-8, 2025
Leadership Communication: BNC Townhall	Internal Bank	20 Agustus 2025 August 20, 2025
Mandatory Training: APU PPT Batch 11	Internal Bank	26 Agustus 2025 August 26, 2025
Sosialisasi LinkedIn Learning 2025 Socialization of LinkedIn Learning 2025	LinkedIn Singapore	3 September 2025 September 3, 2025
AI Training & Workshop	PT Kinarya Media Digital (Digital Bank)	1-2 Oktober 2025 October 1-2, 2025
Sosialisasi *Neo Smart* Socialization of Neo Smart	Internal Bank	16 Oktober 2025 October 16, 2025
Mandatory Training: Anti Fraud Awareness Batch 2	Internal Bank	4 November 2025 November 4, 2025
Mandatory Training: Penerapan Risk Management Batch 3	Internal Bank	21 November 2025 November 21, 2025

Organ Pendukung Direksi
Board of Directors Supporting Organs

Dalam menjalankan fungsi pengelolaan Perseroan, Direksi memiliki kewenangan untuk membentuk organ pendukung yang bersifat struktural maupun fungsional guna menunjang pelaksanaan tugas dan tanggung jawab Direksi.

Hingga akhir tahun pelaporan, Direksi telah membentuk organ pendukung yang bersifat fungsional dalam bentuk komite, yaitu:
1. Komite Manajemen Risiko (*Risk Management Committee*).
2. Komite Kebijakan Perkreditan (*Credit Policy Committee*).
3. Komite Kredit (*Credit Committee*).
4. Komite Personalia (*Komite HR/HR Committee*).
5. Komite Aset dan Liabilitas (*Asset & Liability Committee/ALCO*).
6. Komite Pengarah Teknologi Informasi (*IT Steering Committee*).
7. Komite Kredit Bermasalah (*NonPerforming Credit Committee*).
8. Komite Produk (*Product Committee*).

Selain itu, Direksi juga membentuk organ pendukung yang bersifat struktural, antara lain Sekretaris Perusahaan, Satuan Kerja Audit Internal, serta divisi lainnya sesuai kebutuhan organisasi.

In carrying out the Company's management functions, the Board of Directors has the authority to establish both structural and functional supporting organs to assist in the implementation of its duties and responsibilities.

As of the end of the reporting year, the Board of Directors had established functional supporting organs, specifically the following committees:
1. Risk Management Committee.
2. Credit Policy Committee.
3. Credit Committee.
4. Human Resources Committee (HR Committee).
5. Asset and Liability Committee (ALCO).
6. IT Steering Committee.
7. Non-Performing Credit Committee.
8. Product Committee.

In addition, the Board of Directors also establishes structural support units, such as the Corporate Secretary, the Internal Audit Unit, and other divisions as required by the organization.

Komite Manajemen Risiko
Risk Management Committee

Direksi membentuk Komite Manajemen Risiko dengan tujuan untuk menetapkan, mengevaluasi pelaksanaan, serta menyempurnakan kebijakan dan metodologi pengelolaan risiko secara berkelanjutan. Pembentukan Komite ini sejalan dengan dinamika dan perkembangan industri jasa keuangan, khususnya perbankan, serta untuk memastikan pengelolaan risiko yang semakin kompleks dapat dilakukan secara efektif dan terintegrasi.

The Board of Directors established the Risk Management Committee with the objective of continuously establishing, evaluating the implementation of, and refining risk management policies and methodologies. The establishment of this Committee aligns with the dynamics and developments in the financial services industry, particularly the banking sector, and aims to ensure that increasingly complex risk management can be conducted effectively and in an integrated manner.

Struktur Keanggotaan Komite Manajemen Risiko
Risk Management Committee Membership Structure

No	Jabatan Position	Keterangan Description
1	Direktur Kepatuhan Compliance Director	Ketua dan Anggota Chairman and Member
2	Direktur Utama President Director	Anggota Member
3	Direktur Bisnis Business Director	Anggota Member
4	Direktur IT IT Director	Anggota Member

Tugas dan Tanggung Jawab Komite Manajemen Risiko

1. Menyusun kebijakan Manajemen Risiko beserta perubahannya, termasuk strategi Manajemen Risiko, tingkat Risiko yang diambil dan toleransi Risiko, kerangka Manajemen Risiko, serta rencana kontinjensi untuk mengantisipasi kondisi tidak normal.
2. Melakukan penyempurnaan proses Manajemen Risiko secara berkala maupun insidentil sebagai respons atas perubahan kondisi internal dan eksternal Bank yang berdampak terhadap kecukupan permodalan, profil Risiko Bank, serta efektivitas penerapan Manajemen Risiko berdasarkan hasil evaluasi.
3. Menetapkan kebijakan dan/atau keputusan bisnis yang bersifat menyimpang dari prosedur normal, antara lain terkait ekspansi usaha yang signifikan melebihi rencana bisnis Bank atau pengambilan posisi maupun eksposur Risiko yang melampaui batas yang telah ditetapkan.
4. Memberikan rekomendasi atas hasil penilaian sendiri (*self-assessment*) untuk keperluan pelaporan profil risiko Bank.

Duties and Responsibilities of the Risk Management Committee

1. Developing Risk Management policies and their amendments, including Risk Management strategies, risk appetite and risk tolerance, the Risk Management framework, and contingency plans to anticipate abnormal conditions.
2. Periodically and as needed, updating the Risk Management process in response to changes in the Bank's internal and external conditions that impact capital adequacy, the Bank's risk profile, and the effectiveness of Risk Management implementation based on evaluation results.
3. Establishing policies and/or business decisions that deviate from normal procedures, including those related to significant business expansion exceeding the Bank's business plan or the assumption of positions and risk exposures that exceed established limits.
4. Providing recommendations based on the results of self-assessments for the purpose of reporting the Bank's risk profile.

Komite Kebijakan Perkreditan (KKP)
Credit Policy Committee (CPC)

Komite Kebijakan Perkreditan, selanjutnya disingkat KKP, merupakan komite yang dibentuk oleh Direksi dalam rangka pengelolaan kebijakan perkreditan. KKP bertujuan untuk mendukung pelaksanaan pemberian kredit yang sehat, dengan mengedepankan pengendalian internal sejak tahap awal proses perkreditan hingga tahap pemantauan, serta senantiasa berlandaskan prinsip kehati-hatian.

The Credit Policy Committee, hereinafter referred to as KKP, is a committee established by the Board of Directors for the purpose of managing credit policy. The KKP aims to support sound credit granting practices by prioritizing internal controls from the initial stages of the credit process through to the monitoring phase, and by consistently adhering to the principle of prudence.

Struktur Keanggotaan Komite Kebijakan Perkreditan
Membership Structure of the Credit Policy Committee

No	Jabatan Position	Keterangan Description
1	Direktur Utama President Director	Ketua Chairman
2	Direktur Bisnis Business Director	Anggota Tetap Permanent Member
3	Chief Credit Review Officer	Anggota Tetap Permanent Member
4	Head of Commercial Lending	Anggota Tetap Permanent Member

Struktur Keanggotaan Komite Kebijakan Perkreditan
Membership Structure of the Credit Policy Committee

No	Jabatan Position	Keterangan Description
5	Head of Retail, Digital & SME Lending	Anggota Tetap Permanent Member
6	Head of Satuan Kerja Audit Intern	Anggota Tetap Permanent Member
7	Head of Compliance	Anggota Tidak Tetap Non Permanent Member
8	Head of Non Retail Credit Review	Anggota Tidak Tetap Non Permanent Member
9	Head of Retail Credit Review	Anggota Tidak Tetap Non Permanent Member
10	Head of Legal	Anggota Tidak Tetap Non Permanent Member
11	Head of Middle Office	Anggota Tidak Tetap Non Permanent Member
12	Head of Credit Administration	Anggota Tidak Tetap Non Permanent Member
13	Head of Risk Management	Sekretaris Secretary

Tugas dan Tanggung Jawab Komite Kebijakan Perkreditan

Tugas Komite Kebijakan Perkreditan meliputi antara lain:
1. Memberikan masukan kepada Direksi dalam penyusunan Kebijakan Perkreditan Bank (KPB), khususnya yang berkaitan dengan perumusan dan penerapan prinsip kehatihatian dalam kegiatan perkreditan.
2. Mengawasi penerapan KPB agar dapat dijalankan secara konsisten dan berkesinambungan, serta merumuskan solusi atas kendala atau hambatan yang timbul dalam implementasi KPB. Komite juga melakukan kajian berkala terhadap KPB dan memberikan rekomendasi kepada Direksi apabila diperlukan penyesuaian atau penyempurnaan kebijakan.
3. Mengusulkan kepada Direksi terkait keanggotaan Komite Kredit serta perubahan keanggotaannya apabila diperlukan.
4. Melakukan pemantauan dan evaluasi terhadap:
   a. Perkembangan dan kualitas portofolio kredit secara menyeluruh.
   b. Kesesuaian pelaksanaan kewenangan dalam pengambilan keputusan kredit.
   c. Proses pemberian, perkembangan, serta kualitas kredit kepada pihak terkait dan debiturdebitur besar tertentu.
   d. Kepatuhan terhadap ketentuan Batas Maksimum Pemberian Kredit (BMPK).

Duties and Responsibilities of the Credit Policy Committee

The duties of the Credit Policy Committee are as follows:
1. Providing input to the Board of Directors in the formulation of the Bank's Credit Policy (KPB), particularly regarding the formulation and application of the principle of prudence in credit activities.
2. Overseeing the implementation of the KPB to ensure its consistency and continuity, as well as formulating solutions to challenges or obstacles arising during its implementation. The Committee also conducts periodic reviews of the KPB and provides recommendations to the Board of Directors if adjustments or refinements to the policy are necessary.
3. Proposing to the Board of Directors regarding the membership of the Credit Committee and changes to its membership when necessary.
4. Monitoring and evaluating:
   a. The overall development and quality of the credit portfolio.
   b. The appropriateness of the authority exercised in credit decision-making.
   c. The process of granting, the development, and the quality of loans to related parties and certain large borrowers.
   d. Compliance with the Maximum Credit Limit (BPMK) provisions.

e. Kepatuhan terhadap peraturan perundang-undangan dan ketentuan lainnya dalam kegiatan perkreditan.
f. Penyelesaian kredit bermasalah sesuai dengan ketentuan dalam KPB, termasuk upaya Bank dalam memenuhi kecukupan penyisihan penghapusan kredit.

Tanggung Jawab Komite Kebijakan Perkreditan
1. Menyampaikan laporan tertulis kepada Direksi dengan tembusan kepada Dewan Komisaris paling sedikit 1 (satu) kali dalam 1 (satu) tahun, yang memuat:
   a. Hasil pengawasan atas penerapan dan pelaksanaan KPB.
   b. Hasil pemantauan dan evaluasi atas pelaksanaan fungsi KKP sebagaimana dimaksud di atas.
2. Memberikan saran serta rekomendasi langkah-langkah perbaikan kepada Direksi, dengan tembusan kepada Dewan Komisaris, terkait pelaksanaan tugas dan tanggung jawab KKP.

e. Compliance with laws, regulations, and other provisions in credit activities.
f. Resolution of non-performing loans in accordance with the provisions of the KPB, including the Bank's efforts to ensure adequate loan loss provisions.

Responsibilities of the Credit Policy Committee
1. To submit a written report to the Board of Directors, with a copy to the Board of Commissioners, at least once a year, which includes:
   a. The results of supervision over the implementation and execution of the Credit Policy (KPB).
   b. The results of monitoring and evaluation of the performance of the Credit Policy Committee (KKP) functions as referred to above.
2. To provide advice and recommendations for corrective actions to the Board of Directors, with a copy to the Board of Commissioners, in relation to the implementation of the duties and responsibilities of the Credit Policy Committee (KKP).

Komite Kredit (KK)
Credit Committee (CC)

Komite Kredit merupakan komite yang dibentuk oleh Direksi dengan mandat untuk melakukan evaluasi dan/atau menetapkan keputusan kredit atas jumlah serta jenis fasilitas kredit sesuai kewenangan yang ditetapkan Direksi. Dalam menjalankan fungsinya, Komite Kredit senantiasa mempertimbangkan pengembangan bisnis Bank dengan tetap menjunjung tinggi prinsip kehatihatian serta menerapkan prinsip *four eyes principles* secara konsisten.

The Credit Committee is a committee established by the Board of Directors with the mandate to evaluate and/or make credit decisions regarding the amount and type of credit facilities in accordance with the authority granted by the Board of Directors. In carrying out its functions, the Credit Committee consistently considers the Bank's business development while upholding the principle of prudence and consistently applying the four-eyes principle.

Struktur Keanggotaan Komite Kredit

Keanggotaan Komite Kredit disesuaikan dengan karakteristik produk, segmen, serta aktivitas perkreditan yang dijalankan, termasuk besaran limit kredit yang diberikan.

Credit Committee Membership Structure

The membership of the Credit Committee is tailored to the characteristics of the products, segments, and credit activities conducted, including the size of the credit limits granted.

Tugas dan Tanggung Jawab Komite Kredit

Komite Kredit (KK) memiliki Tugas dan tanggung jawab yang paling sedikit namun tidak terbatas atas hal-hal sebagai berikut:
1. Memberikan persetujuan atau menolak usulan permohonan fasilitas kredit sesuai dengan wewenang/ jenis kredit yang ditetapkan oleh Direksi.

Duties and Responsibilities of the Credit Committee

The Credit Committee (CC) has duties and responsibilities which, at a minimum but not limited to, include the following:
1. To approve or reject proposed credit facility applications in accordance with the authority limits and types of credit as determined by the Board of Directors.

2. Melakukan koordinasi dengan *Assets and Liabilities Committee* (ALCO) dalam aspek pendanaan perkreditan.
3. Memastikan bahwa pelaksanaan pemberian kredit telah sesuai dengan Kebijakan dan Pedoman Perkreditan yang berlaku.
4. Memastikan bahwa kredit diberikan sesuai dengan ketentuan yang berlaku dan sesuai dengan asas-asas perkreditan yang sehat.
5. Memastikan bahwa penggunaan wewenang memutus kredit telah memenuhi prinsip *four-eyes principle.*
6. Melaksanakan tugas terutama dalam kaitannya dengan pemberian persetujuan kredit berdasarkan kemahiran profesionalnya secara jujur, obyektif, cermat, konsekuen dan konsisten.
7. Menolak permintaan dan atau pengaruh pihak-pihak yang berkepentingan dengan pemohon kredit untuk memberikan persetujuan kredit yang hanya bersifat formalitas.
8. Menyadari dan memahami sepenuhnya ketentuan yang terdapat pada Undang-undang No. 4 tahun 2003 tentang Pengembangan dan Penguatan Sektor Keuangan, Bab IV Perbankan pasal 37E ayat 1, 2, 3 dan 4 serta pasal 49 ayat 1, 2, 3, 4 dan 5 serta menjauhkan diri dari perbuatan-perbuatan sebagaimana disebutkan dalam pasal tersebut.

2. To coordinate with the Assets and Liabilities Committee (ALCO) in relation to credit funding aspects.
3. To ensure that the credit granting process is implemented in accordance with the prevailing Credit Policies and Guidelines.
4. To ensure that credit is extended in compliance with applicable regulations and in line with prudent banking principles.
5. To ensure that the exercise of credit approval authority complies with the four-eyes principle.
6. To perform its duties, particularly in relation to credit approval, based on professional competence in an honest, objective, prudent, consequent and consistent.
7. To reject any requests and/or influence from interested parties related to credit applicants that aim to obtain credit approval merely as a formality.
8. To fully understand and comply with the provisions of Law No. 4 of 2023 on Financial Sector Development and Strengthening, Chapter IV on Banking, Article 37E paragraphs (1), (2), (3), and (4), as well as Article 49 paragraphs (1), (2), (3), (4), and (5), and to refrain from any actions as prohibited under those provisions.

Komite Personalia
HR Committee

Direksi membentuk Komite Personalia (SDM) untuk melakukan peninjauan serta penyempurnaan kebijakan Sumber Daya Manusia secara berkelanjutan agar selaras dengan rencana bisnis Bank. Peninjauan kebijakan SDM ini juga merupakan bagian dari upaya penerapan Tata Kelola Perusahaan yang baik melalui mekanisme pengendalian dan implementasi kebijakan strategis, termasuk di bidang *Learning & Development*, *Compensation & Benefit*, *Talent Management*, serta kebijakan strategis SDM lainnya.

The Board of Directors established the HR Committee to continuously review and refine HR policies to ensure their alignment with the Bank's business plan. The review of HR policies is also part of efforts to implement good corporate governance through control mechanisms and the implementation of strategic policies, including in the areas of Learning & Development, Compensation & Benefits, Talent Management, and other strategic HR policies.

Struktur Keanggotaan

Komite Personalia terdiri dari:
1. Direktur Utama
2. Direktur
3. Direktur Kepatuhan
4. Kepala Divisi HR

Membership Structure

The HR Committee consists of:
1. President Director
2. Director
3. Compliance Director
4. Head of HR Division

Tugas dan Tanggung Jawab

HR *Committee* bertanggung jawab dalam mendukung akuntabilitas tata kelola Perseroan, dengan tugas dan tanggung jawab sebagai berikut:

1. Menetapkan arah strategis pengelolaan sumber daya manusia.
2. Merumuskan serta menetapkan kebijakan umum di bidang SDM.
3. Memantau, mengevaluasi, dan melaporkan pelaksanaan programprogram SDM, termasuk namun tidak terbatas pada:
   a. Kebijakan umum ketenagakerjaan.
   b. Kebijakan kompensasi dan manfaat karyawan, termasuk kenaikan gaji, bonus, program retensi, serta manfaat lainnya.
   c. Sistem dan proses penilaian kinerja.
   d. Manajemen talenta, mencakup identifikasi talenta, perencanaan suksesi, dan program pengembangan talenta.
   e. Kerangka kerja serta rencana program pelatihan dan pengembangan karyawan.
   f. Struktur organisasi dan jenjang kepangkatan.
   g. Pengembangan iklim kerja yang kondusif.
   h. Penguatan dan pengembangan budaya perusahaan.
   i. Pengelolaan dan pengembangan hubungan antara karyawan dan perusahaan.

Duties and Responsibilities

The HR Committee is responsible for supporting the accountability of the Company's governance, and has the following duties and responsibilities:

1. Setting the strategic direction for human resource management.
2. Formulating and establishing general policies in the field of human resources.
3. Monitoring, evaluating, and reporting on the implementation of HR programs, including but not limited to:
   a. General employment policies.
   b. Policy on employee compensation and benefits, including salary increases, bonuses, retention programs, and other benefits.
   c. Performance evaluation systems and processes.
   d. Talent management, including talent identification, succession planning, and talent development programs.
   e. Frameworks and plans for employee training and development programs.
   f. Organizational structure and rank hierarchy.
   g. Fostering a conducive work environment.
   h. Strengthening and developing corporate culture.
   i. Management and development of relationship between employees and the Company.

Komite Aset & Liabilitas (ALCO)

Asset & Liability Committee (ALCO)

Komite Aset & Liabilitas merupakan komite pendukung Direksi yang bertugas untuk menganalisis dan mengevaluasi pengelolaan aset dan liabilitas Bank, serta menetapkan keputusan strategis melalui perumusan kebijakan, strategi, dan sasaran pengelolaan aset dan liabilitas secara terintegrasi. ALCO juga berperan dalam mengurangi dan meminimalkan risiko perbankan, khususnya Risiko Likuiditas, Risiko Suku Bunga, dan Risiko Nilai Tukar.

The Asset & Liability Committee is a committee that supports the Board of Directors in analyzing and evaluating the management of the Bank's assets and liabilities, as well as making strategic decisions through the formulation of integrated policies, strategies, and objectives for asset and liability management. ALCO also plays a role in reducing and minimizing banking risks, particularly Liquidity Risk, Interest Rate Risk, and Foreign Exchange Risk.

Struktur Keanggotaan Komite Aset & Liabilitas (ALCO)

Membership Structure of the Asset and Liabiliaty Committee (ALCO)

No.	Jabatan Position	Keterangan Description
Anggota Tetap Permanent Member		
1	Direktur Utama President Director	Ketua Chairman
2	Direktur Bisnis Business Director	Wakil Ketua Vice Chairman
3	Chief Financial Officer	Anggota | Member
4	Head of Treasury	Koordinator & Sekretaris ALCO ALCO Coordinator and Secretary
5	Head of Funding & Business Network	Anggota | Member
6	Head of Corporate Solution	Anggota | Member
7	Head of Risk Management	Anggota | Member
8	Head of Retail, Digital & SME Lending	Anggota | Member
9	Head of Commercial Lending	Anggota | Member
10	Head of Middle Office	Anggota | Member
Observer		
1	Compliance Director	Observer

Tugas dan Tanggung Jawab Komite Aset & Liabilitas (ALCO)

1. Menetapkan strategi pengelolaan aset dan liabilitas serta kebijakan tingkat suku bunga guna mencapai tingkat pengembalian (*return*) yang optimal sesuai dengan *risk appetite* Bank.
2. Melakukan analisis dan koordinasi pengelolaan aset dan liabilitas dalam rangka mengoptimalkan pendapatan Bank.
3. Melakukan evaluasi terhadap kondisi dan proyeksi ekonomi terkini untuk mengantisipasi dampaknya terhadap posisi aset dan liabilitas Bank.
4. Memastikan rasio likuiditas Bank tetap selaras dengan kebijakan internal dan ketentuan eksternal yang berlaku.
5. Melakukan penelaahan secara berkala atas posisi likuiditas Bank Neo Commerce serta alokasi penempatan dana pada aset produktif (*earning assets*).

Duties and Responsibilities of the Asset & Liability Committee (ALCO)

1. Establishing asset and liability management strategies and interest rate policies to achieve an optimal return in line with the Bank's risk appetite.
2. Analyzing and coordinating asset and liability management to optimize the Bank's income.
3. Evaluating current economic conditions and projections to anticipate their impact on the Bank's asset and liability positions.
4. Ensuring that the Bank's liquidity ratios remain in line with applicable internal policies and external regulations.
5. Conducting periodic reviews of Bank Neo Commerce's liquidity position and the allocation of funds to earning assets.

Komite Pengarah Teknologi Informasi (KPTI)
Information Technology Steering Committee (ITSC)

Komite Pengarah Teknologi Informasi dibentuk oleh Direksi dengan tujuan untuk memberikan rekomendasi kepada Direksi terkait penetapan Rencana Strategis Teknologi Informasi (RSTI), kebijakan dan prosedur pemanfaatan Teknologi Informasi, serta berbagai aspek strategis TI lainnya.

Penilaian kinerja Divisi dan Komite dilakukan secara berkala, baik secara individu maupun kolektif. Penilaian tersebut dilaksanakan melalui mekanisme *self-assessment* berdasarkan sistem yang telah disepakati bersama.

The IT Steering Committee was established by the Board of Directors to provide recommendations to the Board regarding the formulation of the Information Technology Strategic Plan (RSTI) as well as policies and procedures for the utilization of information technology and other strategic IT aspects.

Performance evaluations of the Division and Committee are conducted periodically, both individually and collectively. These evaluations are carried out through a self-assessment mechanism based on a mutually agreed-upon system.

Struktur Keanggotaan

Struktur keanggotaan Komite Pengarah Teknologi Informasi disajikan pada:

Membership Structure

The membership structure of the IT Steering Committee is as follows:

No.	Jabatan Position	Keterangan Description
1.	Direktur Teknologi Sistem Informasi Director of Information System Technology	Ketua & Anggota Chairman & Member
2.	Direktur Utama President Director	Anggota | Member
3.	Direktur Kepatuhan Director of Compliance	Anggota | Member
4.	Direktur Bisnis Director of Business	Anggota | Member
5.	Chief Technology Officer	Anggota | Member
6.	Chief Financial Officer	Anggota | Member
7.	Chief Operation Officer	Anggota | Member
8.	Chief Credit Review	Anggota | Member
9.	Head of IT Operation	Anggota | Member
10.	Head of IT Development	Anggota | Member
11.	Head of IT Security & Governance	Sekretaris/Anggota | Secretary/Member
12.	Head of Risk Management	Anggota | Member
13.	Head of Corporate Secretary	Anggota | Member
14.	Head of Human Resources	Anggota | Member
15.	Head of Kepatuhan	Anggota | Member
16.	Head of Legal	Anggota | Member
17.	Head of Commercial Lending	Anggota | Member
18.	Head of Retail, Digital & SME Lending	Anggota | Member
19.	Head of Corporate Solution	Anggota | Member
20.	Head of Treasury	Anggota | Member
21.	Head of Middle Office	Anggota | Member

No.	Jabatan Position	Keterangan Description
22.	Head of Funding & Business Network	Anggota | Member
23.	Head of Data & Digital Product	Anggota | Member
24.	Head of Neo Business	Anggota | Member
25.	Head of Partnership & Strategic Alliances	Anggota | Member
26.	Head of Marketing	Anggota | Member
27.	Head of IT Governance	Anggota | Member
28.	Head of IT Security	Anggota | Member
29.	Head of System Analyst	Anggota | Member
30.	Head of Quality Assurance	Anggota | Member
31.	Head of AI & Data Engineering	Anggota | Member

Tugas dan Tanggung Jawab

Wewenang dan tanggung jawab *IT Steering Committee* dalam memberikan rekomendasi kepada Direksi meliputi:

1. Rencana Strategis Teknologi Informasi (RSTI) yang selaras dengan rencana korporasi Bank, termasuk *IT Roadmap* yang menggambarkan kondisi saat ini dan kondisi yang ditargetkan di masa mendatang.
2. Perumusan kebijakan, prosedur, Petunjuk Pelaksanaan (Juklak), dan Petunjuk Teknis (Juknis) Teknologi Informasi.
3. Kesesuaian antara rencana pengembangan Teknologi Informasi dengan RSTI yang telah ditetapkan.
4. Evaluasi efektivitas biaya Teknologi Informasi terhadap pencapaian manfaat yang direncanakan.
5. Pemantauan kinerja Teknologi Informasi serta inisiatif peningkatan kinerja TI secara berkelanjutan.
6. Kecukupan serta alokasi sumber daya Teknologi Informasi yang dibutuhkan.
7. Evaluasi manfaat yang diperoleh dari penerapan RSTI.
8. Identifikasi potensi kendala yang dapat timbul dalam implementasi RSTI.
9. Upaya penyelesaian berbagai permasalahan Teknologi Informasi yang tidak dapat diselesaikan secara efektif, efisien, dan tepat waktu oleh satuan kerja pengguna maupun penyelenggara TI.

Duties and Responsibilities

The authority and responsibilities of the IT Steering Committee in providing recommendations to the Board of Directors include:

1. Information Technology Strategic Plan (RSTI) aligned with the Bank's corporate plan, including an IT Roadmap that outlines the current condition and the targeted future condition.
2. Formulation of Information Technology policies, procedures, Implementation Guidelines (Juklak), and Technical Guidelines (Juknis).
3. Alignment of Information Technology development plans with the established RSTI.
4. Evaluation of the cost-effectiveness of Information Technology in achieving planned benefits.
5. Monitoring of Information Technology performance and initiatives for continuous IT performance improvement.
6. Adequacy and allocation of required Information Technology resources.
7. Evaluation of the benefits derived from the implementation of the RSTI.
8. Identification of potential obstacles that may arise during the implementation of the RSTI.
9. Efforts to resolve various Information Technology issues that cannot be effectively, efficiently, and timely resolved by user units or IT providers.

Komite Kredit Bermasalah
Non-Performing Loan Committee

Komite Kredit Bermasalah dibentuk oleh Direksi sebagai bagian dari penerapan prinsip *Good Corporate Governance* dalam proses pengambilan keputusan terkait penanganan kredit bermasalah. Komite ini berperan dalam melakukan evaluasi serta menetapkan langkah-langkah strategis yang diperlukan dalam rangka penyelesaian dan pemulihan kredit bermasalah secara *prudent* dan terukur.

The Non-Performing Loan Committee was established by the Board of Directors as part of the implementation of Good Corporate Governance principles in the decision-making process regarding the management of non-performing loans. This committee is responsible for evaluating and determining the strategic measures necessary to resolve and recover non-performing loans prudently and measurably.

Struktur Keanggotaan

Membership Structure

No.	Jabatan Position	Keterangan Description
1	Direktur Utama | President Director	Ketua | Chairman
2	Direktur Bisnis | Business Director	Anggota | Member
3	Chief Operation Officer	Anggota | Member
4	Chief Financial Officer	Anggota | Member
5	Chief Credit Review Officer	Anggota | Member
6	Head of Special Asset Management	Anggota | Member

Tugas dan Tanggung Jawab Komite Kredit Bermasalah

Tugas Komite Kredit Bermasalah meliputi antara lain sebagai berikut:
1. Melakukan restrukturisasi pinjaman sebagai upaya penyelamatan kredit.
2. Menangani kredit bermasalah, termasuk namun tidak terbatas pada penyelesaian melalui *cash settlement*, *asset settlement*/AYDA.
3. Melakukan penjualan atau pengalihan kredit, surat berharga, serta AYDA (*asset disposal*).
4. Melaksanakan proses hapus buku dan hapus tagih sesuai ketentuan yang berlaku.
5. Menerima dan menelaah pembaruan informasi terkait debitur yang ditangani oleh Fungsi SAM maupun debitur yang termasuk dalam program restrukturisasi kredit.
6. Memutuskan memo persetujuan lainnya, antara lain yang berkaitan dengan perubahan struktur pinjaman, jumlah pinjaman, jangka waktu, *terms & conditions*, agunan/jaminan, *pricing*, serta aspek lain yang relevan.

Duties and Responsibilities of the Non-Performing Loan Committee

The duties of the Non-Performing Loan Committee are as follows:
1. Restructuring loans as a credit recovery measure.
2. Handling non-performing loans, including but not limited to resolution through cash settlement and asset settlement/AYDA.
3. Conducting the sale or transfer of loans, securities, and AYDA (asset disposal).
4. Carrying out the write-off and debt cancellation processes in accordance with applicable regulations.
5. Receiving and reviewing updated information regarding debtors handled by the SAM Function as well as debtors included in the loan restructuring program.
6. Approving other approval memos, including those related to changes in loan structure, loan amount, term, terms & conditions, collateral, pricing, and other relevant aspects.

Adapun tanggung jawab Komite Kredit Bermasalah adalah sebagai berikut:

1. Memastikan seluruh penanganan kredit bermasalah telah dilaksanakan sesuai dengan kebijakan dan ketentuan yang berlaku.
2. Melaksanakan tugas penanganan kredit bermasalah berdasarkan kompetensi profesional secara jujur, objektif, cermat, konsekuen, dan konsisten.
3. Menolak segala bentuk permintaan dan/atau pengaruh dari pihak-pihak yang memiliki kepentingan atau berpotensi menimbulkan konflik kepentingan terkait pengajuan proposal persetujuan penanganan kredit bermasalah.

The responsibilities of the Non-Performing Loan Committee are as follows:

1. Ensuring that the management of all non-performing loans is carried out in accordance with applicable policies and regulations.
2. Carrying out the duties of non-performing loan management based on professional competence in an honest, objective, careful, consistent, and thorough manner.
3. Rejecting any form of request and/or influence from parties with a vested interest or that could potentially create a conflict of interest regarding the submission of proposals for the approval of non-performing loan management.

Komite Produk
Product Committee

Direksi Perseroan membentuk Komite Produk untuk mendukung efektivitas pengawasan serta pelaksanaan tugas dan tanggung jawab Direksi yang berkaitan dengan pengembangan produk dan layanan Bank, agar selaras dengan rencana strategis Perseroan.

The Company's Board of Directors established the Product Committee to support the effectiveness of oversight and the fulfillment of its duties and responsibilities related to the development of the Bank's products and services, to ensure their alignment with the Company's strategic plan.

Struktur Keanggotaan
Membership Structure

Keterangan Description	**Jabatan** Position
Anggota tetap Permanent Member	Presiden Direktur (Ketua) President Director (Chairman)
	Direktur Bisnis (Wakil Ketua) Director of Business (Vice-Chairman)
	Chief Financial Officer
	Direktur Informasi Teknologi / Chief Technology Officer Director of Information Technology / Chief Technology Officer
	Chief Credit Review Officer
Anggota tidak tetap Temporary Member	Direktur Kepatuhan Director of Compliance
	Chief Operation Officer
	Kepala Divisi Risk Management Head of Risk Management
	Kepala Divisi Kepatuhan Head of Compliance Division
	Kepala Divisi Retail Credit Review Head of Retail Credit Review Division
Sekretaris Secretary	Kepala Divisi Data and Digital Product Head of Data and Digital Product Division

Tugas dan Tanggung Jawab

Wewenang dan tanggung jawab Komite Produk (*Product Committee*) adalah sebagai berikut:

1. Memberikan masukan dan rekomendasi atas strategi pengembangan produk dan jasa yang dimiliki oleh BNC, serta bertanggung jawab terhadap pelaksanaan produk dan jasa yang ada.
2. Melakukan *review* dan menetapkan produk yang diajukan oleh *business unit*/pemilik produk Bank untuk dijalankan.
3. Mengkaji dan memutuskan keberlanjutan atau penghentian suatu produk berdasarkan hasil evaluasi.
4. Meminta laporan hasil pengembangan atau evaluasi produk dari fungsi bisnis terkait atau pemilik produk.
5. Pemilik produk bertanggung jawab untuk menyediakan informasi produk/layanan yang akan dikembangkan dan membuat dokumentasi sesuai ketentuan atau yang diminta oleh anggota komite termasuk *assessment* potensi risiko dan kepatuhan terhadap regulasi.

Duties and Responsibilities

The Product Committee's authority and responsibilities are as follows:

1. Providing input and recommendations on the development strategy for BNC's products and services, and being responsible for the implementation of existing products and services.
2. Reviewing and approving products proposed by the Bank's business units or product owners for implementation.
3. Reviewing and making decisions regarding the continuation or discontinuation of a product based on evaluation results.
4. Requesting reports on product development or evaluation results from relevant business functions or product owners.
5. Product owners are responsible for providing information on products/services to be developed and preparing documentation in accordance with regulations or as requested by committee members, including risk potential assessments and regulatory compliance.

Sekretaris Perusahaan
Corporate Secretary

Sekretaris Perusahaan merupakan fungsi yang berada di bawah Direksi dan memiliki peran strategis dalam menjaga hubungan antara Perseroan dengan para pemangku kepentingan melalui pelaksanaan keterbukaan informasi. Sekretaris Perusahaan juga berperan dalam memastikan penerapan tata kelola perusahaan yang baik secara wajar, konsisten, dan transparan, termasuk dalam pelaksanaan berbagai tindakan aksi korporasi.

The Corporate Secretary is a function under the Board of Directors that plays a strategic role in maintaining relationships between the Company and its stakeholders through the implementation of information disclosure. The Corporate Secretary also plays a role in ensuring that good corporate governance is applied fairly, consistently, and transparently, including during the implementation of various corporate actions.

Selama periode 1 Januari 2025 hingga 3 Oktober 2025, fungsi Sekretaris Perusahaan dijalankan oleh Agnes Fibri Triliana Dewi berdasarkan Surat Keputusan Direksi No. SKEP/184/SET/DIR/BYB/VIII/2020 dan SKEP/015/SET/BNC/III/2022. Pada periode 4 Oktober 2025 hingga 28 Februari 2026, posisi Sekretaris Perusahaan dijabat oleh Erick Sanjaya Perkasa berdasarkan Surat Keputusan Direksi No. SKEP/126/SET/BNC/X/2025. Sejak 1 Maret 2026 Perseroan menunjuk Heru Sulistiadhi sebagai Sekretaris Perusahaan melalui Surat Keputusan No. SKEP/018/SET/BNC/II/2026.

During the period from January 1, 2025, to October 3, 2025, the Corporate Secretary function was performed by Agnes Fibri Triliana Dewi pursuant to Board of Directors Decree No. SKEP/184/SET/DIR/BYB/VIII/2020 and SKEP/015/SET/BNC/III/2022. From October 4, 2025, to February 28, 2026, the position of Corporate Secretary was held by Erick Sanjaya Perkasa pursuant to Board of Directors Decree No. SKEP/126/SET/BNC/X/2025. Starting March 1, 2026, the Company appointed Heru Sulistiadhi as Corporate Secretary through Decree No. SKEP/018/SET/BNC/II/2026.

Profil Sekretaris Perusahaan

Corporate Secretary Profile

Erick Sanjaya Perkasa
Sekretaris Perusahaan
Corporate Secretary

WNI, usia 32 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 32 years old, Indonesian Citizen

Riwayat Pendidikan/Sertifikasi	• Master of Public Notary dari Universitas Pelita Harapan • Sarjana Hukum dari Universitas International Batam • Master of Public Notary dari Universitas Pelita Harapan • Sarjana Hukum dari Universitas International Batam
Riwayat Pekerjaan Work Experience	• Head of Legal PT Bank Neo Commerce Tbk • Head of Legal Akulaku Group • Senior Associate Budidjaja International Lawyers • Associate Schinder Law Firm • Head of Legal PT Bank Neo Commerce Tbk • Head of Legal Akulaku Group • Senior Associate Budidjaja International Lawyers • Associate Schinder Law Firm
Hubungan Afiliasi Affiliated Relationship	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi ataupun Pemegang Saham Pengendali. Has no affilated relationshup with members of the Board of Commissioners, members of the Board of Directors, or Controlling Shareholders.

Heru Sulistiadhi
Sekretaris Perusahaan
Corporate Secretary

WNI, usia 51 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 51 years old, Indonesian Citizen

Riwayat Pendidikan/Sertifikasi	• Master of Management in Finance dari Universitas Gadjah Mada (2000) • Master of Management in Finance dari Universitas Gadjah Mada (2000)
Riwayat Pekerjaan Work Experience	• Head of Corporate Secretary PT Bank Neo Commerce Tbk • Corporate Secretary Group Head PT Bank MNC Internasional Tbk • Assistant Vice President Corporate Secretary di PT Bank DBS Indonesia • Board Office Support Head & Corporate Secretary PT Bank Mega Tbk • Head of Corporate Secretary PT Bank Neo Commerce Tbk • Corporate Secretary Group Head PT Bank MNC Internasional Tbk • Assistant Vice President Corporate Secretary di PT Bank DBS Indonesia • Board Office Support Head & Corporate Secretary PT Bank Mega Tbk
Hubungan Afiliasi Affiliated Relationship	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi ataupun pemegang saham pengendali. Has no affiliation with members of the Board of Commissioners, members of the Board of Directors or controlling shareholders.

Tugas dan Tanggung Jawab

Tugas dan tanggung jawab Sekretaris Perusahaan meliputi:

1. Mengikuti dan memantau perkembangan pasar modal, khususnya peraturan perundang-undangan yang berlaku di bidang pasar modal.
2. Memberikan masukan kepada Direksi dan Dewan Komisaris agar Perseroan senantiasa mematuhi ketentuan peraturan perundang-undangan di bidang pasar modal.
3. Mendukung Direksi dan Dewan Komisaris dalam penerapan tata kelola perusahaan, antara lain terkait keterbukaan informasi, penyusunan laporan, penyelenggaraan RUPS, rapat Direksi dan/atau Dewan Komisaris, pelaksanaan program orientasi bagi Direksi dan/atau Dewan Komisaris, serta penyusunan laporan tahunan.
4. Bertindak sebagai penghubung antara Bank dengan pemegang saham, Otoritas Jasa Keuangan, serta pemangku kepentingan lainnya.
5. Menjaga kerahasiaan dokumen, data, dan informasi yang bersifat rahasia, kecuali dalam rangka pemenuhan kewajiban sesuai peraturan perundang-undangan.

The duties and responsibilities of the Corporate Secretary are:

1. Monitoring and following developments in the capital market, particularly in relation to applicable laws and regulations in the capital market sector.
2. Providing input to the Board of Directors and the Board of Commissioners to ensure the Company consistently complies with laws and regulations in the capital market sector.
3. Supporting the Board of Directors and the Board of Commissioners in implementing corporate governance, particularly in relation to information disclosure, report preparation, the organization of GMS, Board of Directors and/or Board of Commissioners meetings, the implementation of orientation programs for the Board of Directors and/or Board of Commissioners, and the preparation of annual reports.
4. Acting as a liaison between the Bank and shareholders, the Financial Services Authority, and other stakeholders.
5. Maintaining the confidentiality of confidential documents, data, and information, except when fulfilling obligations in accordance with laws and regulations.

6. Tidak mengambil keuntungan pribadi, baik secara langsung maupun tidak langsung, yang dapat merugikan Bank.
7. Mengikuti pendidikan dan/atau pelatihan guna meningkatkan pengetahuan dan pemahaman dalam mendukung pelaksanaan tugas.
8. Bertanggung jawab kepada Direksi, sehingga setiap informasi yang disampaikan kepada publik merupakan informasi resmi dari Bank.
9. Menyampaikan informasi kepada internal Perseroan terkait setiap keputusan Direksi untuk kepentingan Perseroan.

Pelaksanaan Kegiatan Kerja Sekretaris Perusahaan

Sepanjang tahun 2025, Sekretaris Perusahaan telah melaksanakan tugas dan tanggung jawabnya sesuai dengan ketentuan yang berlaku. Secara khusus, Sekretaris Perusahaan memastikan terpenuhinya aspek keterbukaan informasi sebagai bagian dari kewajiban regulasi Perseroan. Selain itu, Sekretaris Perusahaan juga membina hubungan yang baik dengan para pemangku kepentingan, termasuk pemegang saham, nasabah, regulator, media, dan masyarakat umum.

Adapun kegiatan yang telah dilaksanakan selama tahun 2025 antara lain sebagai berikut:

1. Secara aktif mengikuti perkembangan peraturan, khususnya di bidang pasar modal, antara lain melalui partisipasi dalam program pelatihan yang diselenggarakan oleh BEI, OJK, asosiasi, dan lembaga terkait lainnya.
2. Melaksanakan penerapan tata kelola perusahaan, antara lain melalui:
   a. Penyelenggaraan RUPST dan RUPSLB pada tanggal 27 Mei 2025, RUPSLB pada tanggal 16 Juni 2025 dan RUPSLB pada tanggal 16 Oktober 2025 sesuai dengan POJK No. 15/POJK.04/2020 dan ketentuan yang berlaku.
   b. Pelaksanaan keterbukaan informasi kepada *stakeholders* sesuai ketentuan yang berlaku, termasuk pembaruan informasi pada situs web Perseroan.
   c. Penyelenggaraan, kehadiran, dan pendokumentasian Rapat Direksi, Rapat Dewan Komisaris, serta rapat Komite-komite di bawah Dewan Komisaris.

6. Not seeking personal gain, either directly or indirectly, that could harm the Bank.
7. Attending education and/or training to enhance knowledge and understanding in performing duties.
8. Being accountable to the Board of Directors, ensuring that all information disclosed to the public is official information from the Bank.
9. Communicating information internally regarding every decision made by the Board of Directors for the benefit of the Company.

Implementation of Corporate Secretary Duties

Throughout 2025, the Corporate Secretary has carried out their duties and responsibilities in accordance with applicable regulations. Specifically, the Corporate Secretary ensures compliance with information disclosure requirements as part of the Company's regulatory obligations. Additionally, the Corporate Secretary fosters good relationships with stakeholders, including shareholders, customers, regulators, the media, and the general public.

The following are some of the activities carried out during 2025:

1. Actively monitoring regulatory developments, particularly in the capital market sector, including through participation in training programs organized by the IDX, OJK, associations, and other relevant institutions.
2. Implementing corporate governance practices, including through:
   a. The organization of the AGMS and EGMS on May 27, 2025, the EGMS on June 16, 2025, and the EGMS on October 16, 2025, in accordance with OJK Regulation No. 15/POJK.04/2020 and applicable regulations.
   b. Ensuring transparency of information to stakeholders in accordance with applicable regulations, including updating information on the Company's website.
   c. Organizing, attending, and documenting Board of Directors meetings, Board of Commissioners meetings, and meetings of committees under the Board of Commissioners.

d. Penyampaian laporan berkala dan laporan insidentil kepada regulator dan pemangku kepentingan secara transparan.
3. Menyelenggarakan Paparan Publik pada 16 Desember 2025 sebagai pemenuhan kewajiban penyampaian informasi kepada publik sesuai ketentuan Bursa Efek Indonesia.
4. Memberikan layanan atas setiap permintaan informasi dari pemegang saham terkait kondisi Perseroan.
5. Menyusun dan mengelola dokumentasi dalam proses *Fit and Proper Test* bagi calon Direksi Perseroan.
6. Membangun serta memelihara hubungan yang baik dengan media, termasuk penyediaan informasi yang akurat dan relevan.
7. Menyelenggarakan kegiatan *Corporate Social Responsibility* (CSR).

Program Pengembangan Kompetensi Sekretaris Perusahaan

Pelaksanaan program pengembangan kompetensi bagi Sekretaris Perusahaan merupakan bagian dari komitmen Perseroan dalam memastikan tersedianya kapabilitas yang memadai untuk mendukung peran strategis fungsi Sekretaris Perusahaan. Informasi terkait program pengembangan tersebut disajikan secara lebih rinci pada Bab Tinjauan Pendukung Bisnis, khususnya pada bagian Sumber Daya Manusia, dalam Laporan Tahunan ini.

d. Submitting periodic and ad hoc reports to regulators and stakeholders in a transparent manner.
3. Conducting a Public Presentation on December 16, 2025, to fulfill the obligation to provide information to the public in accordance with the regulations of the Indonesia Stock Exchange.
4. Providing services in response to any information requests from shareholders regarding the Company's condition.
5. Preparing and managing documentation for the Fit and Proper Test process for candidates for the Company's Board of Directors.
6. Building and maintaining good relations with the media, including providing accurate and relevant information.
7. Conducting Corporate Social Responsibility (CSR) activities.

Corporate Secretary Competency Development Program

The competency development program for the Corporate Secretary is part of the Company's commitment to ensuring the availability of adequate capabilities to support the strategic role of the Corporate Secretary function. Information regarding this development program is presented in greater detail in the Business Support Overview chapter, specifically in the Human Resources section, of this Annual Report.

Satuan Kerja Audit Intern (SKAI)

Internal Audit Unit (SKAI)

Satuan Kerja Audit Intern (SKAI) dibentuk untuk memperkuat dan menjaga keberlanjutan Bank melalui penyediaan jasa *assurance* dan konsultasi yang berbasis risiko serta dilaksanakan secara independen dan objektif. SKAI berperan sebagai mitra strategis manajemen dalam mendukung pencapaian tujuan Perseroan sekaligus mendorong terwujudnya tata kelola perusahaan yang baik.

Sebagai lini ketiga dalam *Three Lines Model*, SKAI secara konsisten menjalin komunikasi dan kolaborasi dengan fungsi lini lainnya. Sinergi ini dilakukan secara berkelanjutan guna menciptakan dan menjaga nilai tambah yang selaras dengan kepentingan para pemangku kepentingan, melalui pelaksanaan fungsi *assurance* dan konsultasi yang efektif.

Pelaksanaan fungsi *assurance* dilakukan melalui audit berbasis risiko (*Risk Based Audit*), sementara fungsi konsultasi dilaksanakan baik secara formal maupun informal, termasuk melalui penugasan khusus berdasarkan permintaan manajemen. Dalam mendukung efektivitas pelaksanaan tugas tersebut, SKAI terus melakukan penyempurnaan metodologi audit serta mengembangkan pemanfaatan teknologi agar selaras dengan dinamika dan kompleksitas bisnis. Upaya ini ditujukan untuk mendorong peningkatan kualitas tata kelola, pengelolaan risiko, serta kecukupan dan efektivitas sistem pengendalian internal.

Piagam Audit Intern

SKAI berpedoman pada Piagam Audit Intern yang ditinjau dan diperbarui secara berkala guna memastikan kesesuaiannya dengan perkembangan regulasi dan praktik terbaik. Piagam Audit Intern disahkan oleh Direksi dan Dewan Komisaris, dengan pembaruan terakhir dilakukan pada tanggal 18 Desember 2025.

Penyusunan Piagam Audit Intern mengacu pada POJK No. 1/POJK.03/2019 tentang Penerapan Fungsi Audit Intern pada Bank Umum serta *Global Internal Audit Standards*, sebagai landasan pelaksanaan fungsi Audit Intern yang independen dan profesional.

The Internal Audit Unit (SKAI) was established to strengthen and ensure the Bank's sustainability by providing risk-based assurance and consulting services through independent and objective audits. SKAI serves as a strategic partner to management in supporting the achievement of the Company's objectives while promoting good corporate governance.

As the third line in the Three Lines Model, SKAI consistently maintains communication and collaboration with other functional lines. This synergy is pursued continuously to create and maintain value aligned with the interests of stakeholders, through the effective execution of assurance and consulting functions.

The assurance function is carried out through risk-based audits, while the consulting function is performed both formally and informally, including through special assignments at management's request. To support the effectiveness of these tasks, SKAI continuously refines its audit methodologies and expands the use of technology to align with the dynamics and complexity of the business. These efforts are aimed at promoting improvements in governance quality, risk management, as well as the adequacy and effectiveness of internal control systems.

Internal Audit Charter

SKAI is guided by the Internal Audit Charter, which is reviewed and updated periodically to ensure its alignment with regulatory developments and best practices. The Internal Audit Charter was ratified by the Board of Directors and the Board of Commissioners, with the latest update dated December 18, 2025.

The Internal Audit Charter was drafted in accordance with POJK No. 1/POJK.03/2019 regarding the Implementation of the Internal Audit Function in Commercial Banks and the Global Internal Audit Standards, serving as the foundation for the independent and professional execution of the Internal Audit function.

Kedudukan dan Struktur SKAI

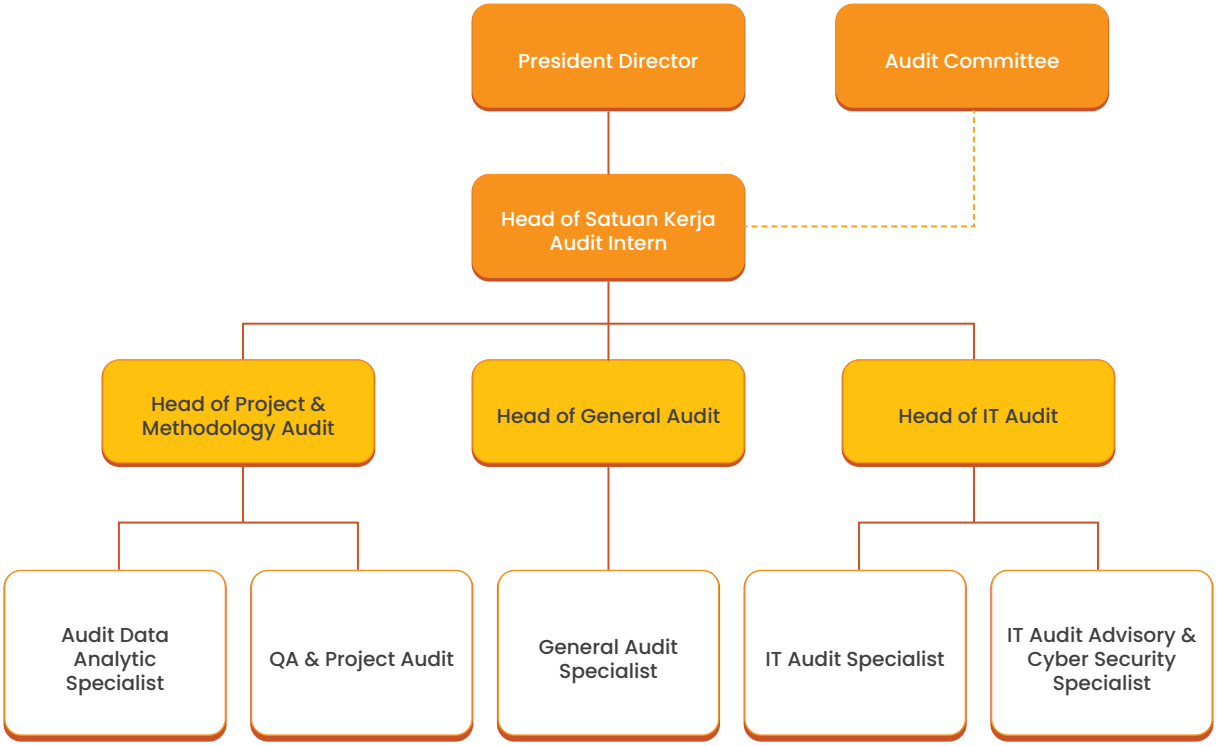
SKAI bertanggung jawab langsung kepada Direktur Utama dan memiliki akses komunikasi langsung dengan Dewan Komisaris melalui Komite Audit. Dalam mendukung strategi dan arah bisnis Perseroan, struktur organisasi SKAI terdiri atas 3 (tiga) departemen, yaitu *General Audit Department*, *IT Audit Department*, dan *Project & Audit Methodology Department*.

Seluruh departemen tersebut berada di bawah kepemimpinan Kepala Satuan Kerja Audit Intern dan disusun untuk memastikan cakupan audit yang komprehensif serta responsif terhadap kebutuhan bisnis Perseroan.

Position and Structure of SKAI

SKAI reports directly to the President Director and maintains direct communication with the Board of Commissioners through the Audit Committee. To support the Company's business strategy and direction, SKAI's organizational structure consists of 3 (three) departments: the General Audit Department, the IT Audit Department, and the Project & Audit Methodology Department.

All of these departments are under the leadership of the Head of the Internal Audit Unit and are organized to ensure comprehensive audit coverage and responsiveness to the Company's business needs.



Profil Kepala SKAI

Perseroan telah menunjuk M. Syafril Maulana M. sebagai Kepala Satuan Kerja Audit Intern sejak tanggal 3 April 2023 berdasarkan Surat Keputusan Nomor SKEP/296/HR/BNC/IV/2023 tanggal 3 April 2023. Pengangkatan tersebut telah dilaporkan kepada Otoritas Jasa Keuangan (OJK) melalui Surat No. 093/SET/DIR/BNC/IV/2023 tanggal 4 April 2023.

Head of SKAI Profile

The Company has appointed M. Syafril Maulana M. as the Head of the Internal Audit Unit since April 3, 2023 based on Decree Number SKEP/296/HR/BNC/IV/2023 dated April 3, 2023. The appointment has been reported to the Financial Services Authority (OJK) through Letter No. 093/SET/DIR/BNC/IV/2023 dated April 4, 2023.

M. Syafril Maulana M.
Head of SKAI
Head of SKAI

WNI, usia 44 tahun, Kewarganegaraan Indonesia
Indonesian citizen, 44 years old, Indonesian Citizen

Riwayat Pendidikan/Sertifikasi Educational Background/ Certification	• Indonesia Internal Audit Practitioner (IIAP) Institute of Internal Auditor (2024) • Master's Degree in Business Administration (MBA) – School of Business Management ITB (2009) • Bachelor's Degree in Economics – Universitas Padjadjaran (2004) • Indonesia Internal Audit Practitioner (IIAP) Institute of Internal Auditor (2024) • Master's Degree in Business Administration (MBA) – School of Business Management ITB (2009) • Bachelor's Degree in Economics – Universitas Padjadjaran (2004)
Riwayat Pekerjaan Work Experience	• Head of Internal Audit OY! (2021 – 2023) • Head of Credit Fraud Risk PT Bank DBS Indonesia (2016 – 2021) • Head of Fraud Investigation & Monitoring PT Bank CIMB Niaga (2012 – 2016) • NonLending Fraud Manager Standard Chartered Bank (2011 – 2012) • Quality Control & Process Monitoring HSBC Indonesia (2007 – 2011) • Internal Auditor PT Bank Rakyat Indonesia (2004 – 2007) • Head of Internal Audit OY! (2021 – 2023) • Head of Credit Fraud Risk PT Bank DBS Indonesia (2016 – 2021) • Head of Fraud Investigation & Monitoring PT Bank CIMB Niaga (2012 – 2016) • NonLending Fraud Manager Standard Chartered Bank (2011 – 2012) • Quality Control & Process Monitoring HSBC Indonesia (2007 – 2011) • Internal Auditor PT Bank Rakyat Indonesia (2004 – 2007)
Jabatan Lainnya Other positions	Tidak Ada None
Dasar Hukum Pengangkatan Legal Basis for Appointment	Surat Keputusan Nomor SKEP/296/HR/BNC/IV/2023 tanggal 3 April 2023. Decision Letter Number SKEP/296/HR/BNC/IV/2023 dated April 3, 2023.
Hubungan Afiliasi Affiliate relationship	Tidak memiliki hubungan afiliasi dengan anggota Dewan Komisaris, anggota Direksi ataupun pemegang saham pengendali. No affiliation with other members of the Board of Commissioners, members of the Board of Directors or controlling shareholders.
Periode Jabatan Term of Office	3 April 2023 sampai dengan sekarang April 3, 2023 until now

Sepanjang tahun 2025, Kepala SKAI secara aktif mengikuti berbagai program pengembangan kompetensi guna memperkuat efektivitas pelaksanaan tugas dan tanggung jawabnya. Rincian pelatihan yang diikuti diungkapkan pada Bab 4 mengenai Tinjauan Pendukung Bisnis.

Tugas dan Tanggung Jawab SKAI

Dalam menjalankan fungsinya, SKAI memiliki tugas dan tanggung jawab sebagai berikut:
1. Membantu tugas Direktur Utama dan Dewan Komisaris dalam melakukan pengawasan dengan cara menjabarkan secara operasional baik perencanaan, pelaksanaan, maupun pemantauan hasil audit.
2. Menyusun dan mengkaji Piagam Audit Intern secara periodik.
3. Membuat analisis dan penilaian di bidang keuangan, akuntansi, operasional dan kegiatan lain melalui audit.

Throughout 2025, the Head of SKAI actively participated in various competency development programs to enhance the effectiveness of his duties and responsibilities. Details of the training attended are outlined in Chapter 4 on Business Support Overview.

Duties and Responsibilities of SKAI

In carrying out its functions, SKAI has the following duties and responsibilities:
1. Assisting the President Director and the Board of Commissioners in performing oversight by elaborating on the operational aspects of planning, implementation, and monitoring of audit results.
2. Periodically drafting and reviewing the Internal Audit Charter.
3. Analyzing and assessing financial, accounting, operational, and other activities through audits.

4. Mengidentifikasi segala kemungkinan untuk memperbaiki dan meningkatkan efisiensi penggunaan sumber daya dan dana.
5. Memberikan saran perbaikan dan informasi yang objektif tentang kegiatan yang diperiksa pada semua tingkatan manajemen.
6. Menyusun dan menjalankan rencana audit serta melaporkan dan memantau hasil audit kepada Direktur Utama dan Dewan Komisaris melalui Komite Audit.
7. Memastikan pelaksanaan SKAI sesuai dengan *Global Internal Audit Standards* (*GIAS*).
8. Memilih sumber daya manusia yang kompeten sesuai dengan kebutuhan dalam pelaksanaan tugas SKAI.
9. Memastikan anggota SKAI mengikuti pengembangan profesional berkelanjutan serta pelatihan lain sesuai dengan perkembangan kompleksitas dan kegiatan usaha Bank.
10. Memastikan dalam hal terdapat penggunaan jasa pihak ekstern untuk aktivitas Audit Intern:
    a. Terselenggara transfer pengetahuan antara pihak ekstern kepada anggota SKAI mempertimbangkan penggunaan jasa ahli pihak ekstern bersifat sementara.
    b. Penggunaan jasa pihak ekstern tidak memengaruhi independensi dan objektivitas fungsi SKAI.
    c. Pihak ekstern mematuhi Piagam Audit Intern Bank.
11. Bekerja sama dengan seluruh unit kerja terutama dengan fungsi yang melakukan pengendalian lain seperti Manajemen Risiko, Kepatuhan dan lainnya dengan mengedepankan efektivitas fungsi pengendalian.
12. Melakukan komunikasi dengan OJK paling sedikit sekali dalam 1 (satu) tahun serta membuat dan melaporkan Laporan Pelaksanaan dan Pokok-Pokok Hasil Audit Intern ke OJK.

Kewenangan SKAI

Dalam menjalankan tugas dan fungsinya, SKAI memiliki kewenangan sebagai berikut:
1. Memiliki akses secara penuh dan tidak terbatas terhadap seluruh informasi yang relevan tentang Bank terkait dengan tugas dan fungsi SKAI.
2. Menentukan strategi, ruang lingkup, metode dan frekuensi audit secara independen.
3. Melakukan komunikasi secara langsung dengan Direksi, Dewan Komisaris dan Komite Audit.

4. Identifying all opportunities to improve and enhance the efficiency of resource and fund utilization.
5. Providing objective recommendations for improvement and information regarding the activities examined at all management levels.
6. Preparing and implementing audit plans, as well as reporting and monitoring audit results to the President Director and the Board of Commissioners through the Audit Committee.
7. Ensuring the implementation of the Internal Audit Committee (SKAI) is in accordance with the Global Internal Audit Standards (GIAS).
8. Selecting competent human resources in accordance with the needs for the performance of the SKAI's duties.
9. Ensuring SKAI members participate in continuous professional development and other training in line with the evolving complexity and business activities of the Bank.
10. In the use of external parties for Internal Audit, ensure that:
    a. Knowledge transfer occurs between the external party and SKAI members, considering that the use of external experts is temporary.
    b. The use of external parties does not affect the independency and objectivity of the SKAI function.
    c. c. External parties comply with the Bank's Internal Audit Charter.
11. Collaborating with all business units, particularly with functions performing other controls such as Risk Management, Compliance, and others, prioritizing the effectiveness of control functions.
12. Communicating with the OJK at least once a year and prepare and submit the Implementation Report and Key Findings of the Internal Audit to the OJK.

Authority of SKAI

In carrying out its duties and functions, SKAI has the following authority:
1. Have full and unrestricted access to all relevant information regarding the Bank related to the duties and functions of SKAI.
2. Determine audit strategies, scope, methods, and frequency independently.
3. Communicate directly with the Board of Directors, the Board of Commissioners, and the Audit Committee.

4. Menyelenggarakan rapat secara berkala dan insidentil dengan Direksi, Dewan Komisaris, dan Komite Audit.
5. Melakukan koordinasi kegiatan dengan auditor ekstern.
6. Mengikuti rapat yang bersifat strategis tanpa memiliki hak suara.
7. Mendapatkan informasi terkini terkait perkembangan yang terjadi di Bank melalui rapat strategis.
8. Melakukan penugasan audit investigasi tanpa perlu mengkomunikasikan penugasan tersebut kepada pihak-pihak lainnya di Bank. Komunikasi hanya dilakukan dengan Direktur Utama dan Dewan Komisaris melalui Komite Audit.
9. Jika diperlukan, Audit Intern dapat meminta pendapat dari tenaga ahli (profesional) dari dalam maupun luar Bank sesuai ketentuan pengadaan barang dan jasa yang berlaku.

Kode Etik Auditor

Auditor Internal diwajibkan untuk menjunjung tinggi profesionalisme dan mematuhi kode etik dalam setiap pelaksanaan tugas dan tanggung jawabnya. Kode etik tersebut mencakup:

1. Mendemonstrasikan Integritas
   Integritas adalah perilaku yang mencerminkan kepatuhan terhadap prinsip moral dan etika, termasuk mendemonstrasikan kejujuran dan keberanian untuk bertindak berdasarkan fakta yang relevan, bahkan ketika menghadapi tekanan untuk melakukan sebaliknya, atau ketika hal tersebut dapat menimbulkan potensi konsekuensi yang merugikan pribadi atau organisasi. Integritas didemonstrasikan yang mencakup:
   a. Kejujuran dan keberanian profesional.
   b. Ekspektasi etika organisasi.
   c. Perilaku taat hukum dan etis.

2. Mempertahankan Objektivitas
   Objektivitas adalah sikap mental tidak memihak yang memungkinkan auditor intern membuat penilaian profesional, memenuhi tanggung jawabnya dan mencapai tujuan Audit Intern tanpa kompromi. Cakupan objektivitas adalah sebagai berikut:
   a. Objektivitas individu.
   b. Menjaga objektivitas.
   c. Mengungkapkan pelemahan terhadap objektivitas.

4. Hold regular and ad hoc meetings with the Board of Directors, the Board of Commissioners, and the Audit Committee.
5. Coordinate activities with external auditors.
6. Attend strategic meetings without voting rights.
7. Receive up-to-date information regarding developments at the Bank through strategic meetings.
8. Conduct investigative audit assignments without needing to communicate such assignments to other parties within the Bank. Communication is limited to the President Director and the Board of Commissioners through the Audit Committee.
9. If necessary, Internal Audit may seek the opinion of experts (professionals) from within or outside the Bank in accordance with applicable procurement regulations.

Auditor Code of Conduct

Internal Auditors are required to uphold professionalism and adhere to the code of conduct in performing their duties and responsibilities. The code of conduct includes:

1. Demonstrating Integrity
   Integrity is behavior that reflects compliance with moral and ethical principles, including demonstrating honesty and the courage to act based on relevant facts, even when facing pressure to do otherwise, or when doing so may result in potential adverse consequences for oneself or the organization. Integrity is demonstrated through the following:
   a. Professional honesty and courage.
   b. Organizational ethical expectations.
   c. Law-abiding and ethical behavior.

2. Maintaining Objectivity
   Objectivity is an impartial mental attitude that enables internal auditors to make professional judgments, fulfill their responsibilities, and achieve the objectives of the internal audit without compromise. The scope of objectivity is as follows:
   a. Individual objectivity.
   b. Maintaining objectivity.
   c. Disclosing impairments to objectivity.

3. Mendemonstrasikan Kompetensi
   Mendemonstrasikan kompetensi memerlukan pengembangan dan penerapan pengetahuan, keterampilan, dan kemampuan untuk memberikan jasa audit intern. Auditor intern memberikan jasa yang beragam, maka kompetensi yang dibutuhkan oleh setiap auditor intern pun berbedabeda. Pertimbangan penerapan mencakup:
   a. Kompetensi.
   b. Pengembangan profesional berkelanjutan.

4. Menerapkan Kecermatan Profesional
   Kecermatan profesional memerlukan perencanaan dan pelaksanaan jasa audit intern dengan ketekunan, pertimbangan, dan skeptisisme yang dimiliki oleh auditor intern yang bijaksana dan kompeten. Ketika menerapkan kecermatan profesional, auditor intern bekerja demi kepentingan terbaik pihak yang menerima jasa audit intern, namun tidak diharapkan bebas dari kesalahan. Audit intern perlu mempertimbangkan hal sebagai berikut:
   a. Kesesuaian dengan GIAS.
   b. Kecermatan professional.
   c. Skeptisisme Profesional.

5. Menjaga Kerahasiaan
   Auditor intern memiliki akses tidak terbatas terhadap data, catatan, dan informasi lain yang diperlukan untuk memenuhi mandat audit intern, sering kali informasi yang diterima bersifat rahasia, hak milik, dan/atau dapat diidentifikasi secara pribadi. Hal yang perlu diperhatikan dalam prinsip menjaga kerahasian termasuk:
   a. Penggunaan Informasi.
   b. Pelindungan Informasi.

Pengendalian Mutu Audit

Perseroan menerapkan program pengendalian (*Quality Assurance*) dan peningkatan (*Improvement*) mutu audit yang dirancang untuk memastikan kesesuaian seluruh aktivitas Audit Intern dengan standar profesi serta mengevaluasi penerapan kode etik secara konsisten. Program ini diwujudkan melalui pengembangan metodologi audit dan penyempurnaan program audit agar tetap relevan dengan dinamika bisnis serta selaras dengan praktik terbaik (*best practice*).

3. Demonstrating Competence
   Demonstrating competence requires the development and application of knowledge, skills, and abilities to provide internal audit services. Since internal auditors provide a variety of services, the competencies required of each internal auditor vary. Considerations for application include:
   a. Competence.
   b. Continuous professional development.

4. Demonstrating Professionalism
   Professionalism requires the planning and execution of internal audit services with the perseverance, judgment, and skepticism possessed by a prudent and competent internal auditor. When applying professional diligence, internal auditors act in the best interests of the parties receiving internal audit services, though they are not expected to be free from error. Internal auditors should consider the following:
   a. Compliance with GIAS.
   b. Professional diligence.
   c. Professional Skepticism.

5. Maintaining Confidentiality
   Internal auditors have unrestricted access to data, records, and other information necessary to fulfill the internal audit mandate; often, the information received is confidential, proprietary, and/or personally identifiable. Key considerations regarding the principle of maintaining confidentiality include:
   a. Use of Information.
   b. Protection of Information.

Audit Quality Control

The Company implements audit quality assurance and improvement programs designed to ensure that all internal audit activities comply with professional standards and to evaluate the consistent application of the code of ethics. This program is implemented through the development of audit methodologies and the refinement of audit programs to remain relevant to business dynamics and aligned with best practices.

Pelaksanaan pengendalian mutu aktivitas Audit Intern dilakukan baik oleh pihak internal maupun eksternal. Pengendalian mutu internal dilaksanakan melalui pembentukan *Project & Methodology Audit*, yang memiliki tanggung jawab melakukan kaji ulang atas kualitas proses dan hasil audit, sekaligus memastikan kepatuhan auditor terhadap kode etik yang berlaku.

Sementara itu, pengendalian mutu eksternal dilakukan oleh pihak independen secara berkala setiap 3 (tiga) tahun. *External quality assurance review* terakhir dilaksanakan pada tanggal 15 Agustus 2023 oleh KPMG.

Quality control of Internal Audit activities is carried out by both internal and external parties. Internal quality control is carried out through the establishment of the Project & Methodology Audit unit, which is responsible for reviewing the quality of audit processes and results, while ensuring auditors' compliance with the applicable code of ethics.

Meanwhile, external quality control is conducted by an independent party every three years. The most recent external quality assurance review was conducted on August 15, 2023, by KPMG.

Komposisi Personel SKAI

Dalam menjalankan fungsi dan tanggung jawabnya, SKAI didukung oleh sumber daya manusia dengan kompetensi yang beragam dan saling melengkapi. Hingga akhir tahun 2025, SKAI memiliki total 14 personel yang secara kolektif mendukung pelaksanaan audit secara efektif dan berkelanjutan.

SKAI Personnel Composition

In carrying out its functions and responsibilities, SKAI is supported by human resources with diverse and complementary competencies. As of the end of 2025, SKAI has a total of 14 personnel who collectively support the effectiveness and sustainability of audit implementation.

Division/Department	Jumlah Pegawai Total Employee
Head of Satuan Kerja Audit Intern Head of Internal Audit Unit	1
Project & Methodology Audit Department Project & Methodology Audit Department	3
General Audit Department General Audit Department	6
IT Audit Department IT Audit Department	4

Sertifikasi Internal Auditor

Sebagai bagian dari upaya menjaga kualitas dan profesionalisme, SKAI secara berkelanjutan mendorong peningkatan kompetensi seluruh personilnya melalui pendidikan dan sertifikasi profesi. Hingga tahun 2025, sejumlah personel Audit Intern telah memiliki sertifikasi profesional yang relevan sebagai bentuk pemenuhan kualifikasi dan standar kompetensi yang dipersyaratkan.

Internal Auditor Certification

As part of its efforts to maintain quality and professionalism, SKAI continuously encourages the development of its personnel's competencies through education and professional certification. As of 2025, a number of Internal Audit staff have obtained relevant professional certifications to fulfill the required qualifications and competency standards.

Sertifikasi Certification	Jumlah Pegawai Total Employee
Indonesia Internal Audit Practitioner (IIAP) Indonesia Internal Audit Practitioner (IIAP)	1
Certified Fraud Investigator Professional (CFIP) Certified Fraud Investigator Professional (CFIP)	1
Certified AntiFraud Professional (CAFP) Certified AntiFraud Professional (CAFP)	1
Auditor Information Security Management System (ISMS) ISO 27001 Information Security Management System (ISMS) Auditor ISO 27001	12
Sertifikasi Internal Auditor oleh Lembaga Sertifikasi Profesi Perbankan Internal Auditor Certification by the Banking Professional Certification Institute	13
Sertifikat Manajemen Risiko Jenjang 4 Level 4 Risk Management Certificate	7
Sertifikat Manajemen Risiko Jenjang 5 Level 5 Risk Management Certificate	4
Sertifikat Manajemen Risiko Jenjang 6 Level 6 Risk Management Certificate	1

Program Pengembangan Kompetensi SDM SKAI

Pelaksanaan program pendidikan dan pengembangan kompetensi sumber daya manusia SKAI merupakan bagian integral dari strategi penguatan fungsi SKAI. Informasi lebih lanjut mengenai program tersebut disajikan pada Bab Tinjauan Pendukung Bisnis, khususnya pada bagian Sumber Daya Manusia, dalam Laporan Tahunan ini.

SKAI Competency Development Program

The education and competency development program for SKAI personnel is an integral part of the strategy to strengthen SKAI's functions. Further information regarding these programs is presented in the Business Support Overeview Chapter, specifically in the Human Resources section, of this Annual Report.

Partisipasi dalam Perhimpunan Profesi Internal Audit

SKAI secara aktif berpartisipasi dalam berbagai perhimpunan profesi internal audit sebagai upaya memperluas wawasan serta meningkatkan kompetensi profesional auditor internal. Keikutsertaan ini diwujudkan melalui keanggotaan dalam sejumlah asosiasi dan organisasi profesi yang relevan.

Participation in Internal Audit Professional Associations

SKAI actively participates in various internal audit professional associations as part of efforts to broaden perspectives and enhance the professional competencies of internal auditors. This participation is realized through membership in a number of relevant professional associations and organizations.

Nama Asosiasi/Organisasi Name of Association/Organization	Ruang Lingkup Asosiasi/Organisasi Scope of the Association/Organization	Peran Keanggotaan Membership Role
The Institute of Internal Audit (IIA) The Institute of Internal Audit (IIA)	IIA Indonesia Chapter	Anggota Member
Ikatan Auditor Intern Bank (IAIB) Bank Internal Auditor Association (IAIB)	Nasional National	Anggota Member

Realisasi Pelaksanaan Audit Intern

Sepanjang tahun 2025, SKAI telah melaksanakan sebanyak 22 penugasan audit, atau mencapai 115.8% dari Rencana Audit yang mencakup 19 penugasan. Capaian ini mencerminkan komitmen SKAI dalam mendukung efektivitas pengawasan serta responsivitas terhadap kebutuhan pengendalian internal Perseroan.

Implementation of Internal Audit

Throughout 2025, SKAI conducted a total of 22 audit assignments, representing 115.8% of the Audit Plan, which consisted of 19 assignments. This achievement reflects SKAI's commitment to ensuring effective oversight and responsiveness to the Company's internal control needs.

Penyelesaian Tindak Lanjut Hasil Audit

SKAI secara berkesinambungan melakukan pemantauan dan evaluasi atas tindak lanjut rekomendasi hasil audit yang telah disepakati oleh Manajemen. Langkah ini dilakukan untuk memastikan bahwa setiap kelemahan pengendalian internal yang teridentifikasi dapat diperbaiki dan disempurnakan sesuai dengan standar yang berlaku.

Perkembangan penyelesaian tindak lanjut hasil audit secara rutin disampaikan kepada Direksi dan Dewan Komisaris melalui Komite Audit, sebagai bagian dari upaya mendorong efektivitas penyelesaian rekomendasi audit.

Selama tahun 2025, terdapat total 401 komitmen tindak lanjut yang disepakati oleh Manajemen. Dari jumlah tersebut, sebanyak 260 komitmen telah diselesaikan, sementara 141 komitmen lainnya masih dalam proses implementasi sesuai target yang diharapkan.

Follow-Up on Audit Findings

SKAI continuously monitors and evaluates the follow-up on audit recommendations that have been agreed upon by Management. This measure is taken to ensure that any identified internal control weaknesses are corrected and improved in accordance with applicable standards.

Progress on the resolution of audit follow-up actions is routinely reported to the Board of Directors and the Board of Commissioners through the Audit Committee, as part of efforts to promote the effectiveness of resolving audit recommendations.

In 2025, there were a total of 401 follow-up commitments that were agreed by Management. Of this number, 260 commitments have been completed, while the remaining 141 commitments are still in the process of being implemented in line with the expected targets.

Penerapan Fungsi Kepatuhan
Implementation of the Compliance Function

Dalam rangka memperkuat penerapan Tata Kelola Perusahaan yang Baik, Direktur Kepatuhan (Direktur yang membawahi fungsi kepatuhan) memegang peran strategis dalam memastikan seluruh kegiatan usaha Perseroan senantiasa dilaksanakan sesuai dengan ketentuan yang ditetapkan oleh Otoritas Jasa Keuangan (OJK), Bank Indonesia (BI), serta peraturan perundang-undangan lainnya yang berlaku.

Pelaksanaan fungsi kepatuhan tersebut telah disesuaikan dengan POJK No. 46/POJK.03/2017 tanggal 12 Juli 2017 tentang Pelaksanaan Fungsi Kepatuhan Bank Umum, yang selanjutnya diimplementasikan secara internal melalui Surat Keputusan Direksi Nomor SKEP/081/SET/BNC/IV/2024 tanggal 30 April 2024 tentang Kebijakan Kepatuhan. Kebijakan tersebut menjadi pedoman bagi Perseroan dalam menyelenggarakan fungsi kepatuhan secara menyeluruh, yang mencakup antara lain aspek-aspek sebagai berikut:

1. Penunjukan Direktur Kepatuhan
   Perseroan menetapkan seorang Direktur Kepatuhan yang bertanggung jawab atas pengelolaan fungsi kepatuhan ,dengan ruang lingkup tugas dan tanggung jawab antara lain:
   a. Merumuskan dan mengarahkan strategi untuk menumbuhkan dan memperkuat Budaya Kepatuhan di lingkungan Perseroan;
   b. Mengusulkan prinsip-prinsip kebijakan kepatuhan untuk ditetapkan oleh Direksi;
   c. Menetapkan sistem dan prosedur kepatuhan sebagai dasar penyusunan ketentuan dan pedoman internal Perseroan;
   d. Memastikan seluruh kebijakan, ketentuan, sistem, prosedur, serta aktivitas usaha Perseroan telah selaras dengan ketentuan OJK, BI, otoritas terkait lainnya, serta peraturan perundang-undangan yang berlaku;
   e. Mengendalikan dan meminimalkan Risiko Kepatuhan yang dihadapi Perseroan;
   f. Melakukan tindakan pencegahan guna menjaga agar kebijakan dan/atau keputusan Direksi tidak menyimpang dari ketentuan OJK, BI, otoritas terkait lainnya, serta peraturan perundang-undangan;
   g. Memantau dan memastikan kepatuhan Perseroan terhadap seluruh komitmen yang telah disampaikan kepada OJK, BI, maupun otoritas pengawas lainnya;

In order to strengthen the implementation of Good Corporate Governance, the Compliance Director (the Director overseeing the compliance function) plays a strategic role in ensuring that all of the Company's business activities are consistently conducted in accordance with the regulations established by the Financial Services Authority (OJK), Bank Indonesia (BI), and other applicable laws and regulations.

The performance of the compliance function has been aligned with OJK Regulation No. 46/POJK.03/2017 dated July 12, 2017, regarding the Implementation of the Compliance Function in Commercial Banks, which is subsequently implemented internally through Board of Directors Decision No. SKEP/081/SET/BNC/IV/2024 dated April 30, 2024, regarding Compliance Policy. This policy serves as a guideline for the Company in carrying out the compliance function comprehensively, covering, among others, the following aspects:

1. Appointment of the Compliance Director
   The Company appoints a Compliance Director responsible for managing the compliance function, with the following scope of duties and responsibilities:
   a. Formulating and directing strategies to foster and strengthen a culture of compliance within the Company;
   b. Proposing the principles of compliance policy to be established by the Board of Directors;
   c. Establishing compliance systems and procedures as a framework for the preparation of the Company's internal regulations and guidelines;
   d. Ensuring that all policies, regulations, systems, procedures, and business activities of the Company are in line with the provisions of the OJK, BI, other relevant authorities, and applicable laws and regulations;
   e. Controlling and minimizing Compliance Risks faced by the Company;
   f. Taking preventive measures to ensure that the Board of Directors' policies and/or decisions comply with the provisions of the OJK, BI, other relevant authorities, and applicable laws and regulations;
   g. Monitoring and ensuring the Company's compliance with all commitments submitted to the OJK, BI, and other supervisory authorities;

h. Menyampaikan laporan pelaksanaan tugas dan tanggung jawab sebagaimana dimaksud pada poin a sampai dengan f kepada Direktur Utama, dengan tembusan kepada Dewan Komisaris, paling sedikit secara triwulanan.

h. Submitting reports on the performance of duties and responsibilities as referred to in points a through f to the President Director, with a copy to the Board of Commissioners, at least quarterly.

2. Peran Satuan Kerja Kepatuhan (SKK)
Dalam pelaksanaan fungsi kepatuhan, Direktur Kepatuhan didukung oleh Satuan Kerja Kepatuhan (SKK) yang beroperasi secara independen dari satuan kerja operasional. Untuk menghindari potensi konflik kepentingan, Perseroan membentuk unit kerja khusus yang tidak memiliki keterlibatan langsung dengan nasabah, yang bertugas mengawasi penerapan APU/PPT sebagai bagian dari program Anti Pencucian Uang (*AntiMoney Laundering/AML*) dan Pencegahan Pendanaan Terorisme (*Counter Terrorist Financing/CTF*), yang berada di bawah koordinasi Direktur Kepatuhan.

2. Role of the Compliance Unit (SKK)
In carrying out compliance functions, the Compliance Director is supported by the Compliance Unit (SKK), which operates independently from operational units. To avoid potential conflicts of interest, the Company establishes a special unit with no direct involvement with customers, tasked with overseeing the implementation of APU/PPT as part of the Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) programs, under the coordination of the Compliance Director.

3. Penyusunan dan Penyampaian Laporan Kepatuhan
Direktur Kepatuhan secara berkala menyusun dan menyampaikan laporan, yang meliputi:
a. Laporan Khusus Kepatuhan kepada Direktur Utama apabila terdapat kebijakan yang berpotensi meningkatkan Risiko Kepatuhan;
b. Laporan Pelaksanaan Tugas dan Tanggung Jawab Fungsi Kepatuhan secara triwulanan kepada Direktur Utama dengan tembusan kepada Dewan Komisaris;
c. Laporan Pelaksanaan Fungsi Kepatuhan kepada OJK setiap enam bulan dengan tembusan kepada Dewan Komisaris;
d. Laporan pemenuhan serta tindak lanjut atas temuan pemeriksaan yang disampaikan oleh OJK.

3. Preparation and Submission of Compliance Reports
The Compliance Director periodically prepares and submits reports, which include:
a. Special Compliance Reports to the President Director if there are policies that have the potential to increase Compliance Risk;
b. Quarterly Reports on the Implementation of the Duties and Responsibilities of the Compliance Function to the President Director, with a copy to the Board of Commissioners;
c. Reports on the Implementation of the Compliance Function to the OJK every six months, with a copy to the Board of Commissioners;
d. Reports on the fulfillment and follow-up of audit findings submitted by the OJK.

4. Pengawasan oleh Dewan Komisaris
Untuk memastikan efektivitas pelaksanaan fungsi kepatuhan, Dewan Komisaris menjalankan fungsi pengawasan melalui evaluasi berkala atas penerapan fungsi kepatuhan yang dibahas dalam rapat Dewan Komisaris maupun rapat gabungan Direksi dan Dewan Komisaris. Hasil evaluasi tersebut ditindaklanjuti dengan penyampaian rekomendasi guna meningkatkan kualitas pelaksanaan fungsi kepatuhan di masa mendatang.

4. Oversight by the Board of Commissioners
To ensure the effectiveness of the compliance function, the Board of Commissioners performs its oversight function through periodic evaluations of the implementation of the compliance function, discussed during Board of Commissioners meetings as well as joint meetings of the Board of Directors and the Board of Commissioners. The results of these evaluations are followed up with recommendations to improve the quality of compliance function implementation in the future.

5. Penerapan Sanksi dan Penguatan Budaya Kepatuhan
   Dalam rangka menanamkan budaya kepatuhan di seluruh jenjang organisasi, Perseroan memberlakukan sanksi terhadap setiap pelanggaran ketentuan yang berlaku. Pengenaan sanksi dilakukan secara proporsional, mulai dari pengurangan penilaian kinerja hingga pemutusan hubungan kerja, khususnya untuk pelanggaran yang berkaitan dengan tindak pidana perbankan.

Sejalan dengan pengelolaan Risiko Kepatuhan, Perseroan secara berkelanjutan melakukan identifikasi dan analisis terhadap faktor-faktor yang dapat mempengaruhi risiko tersebut, serta memastikan penerapan manajemen risiko yang mencakup kebijakan, sumber daya manusia, dan sistem pengendalian kepatuhan. Perseroan juga memantau pelaksanaan proses operasional agar senantiasa selaras dengan ketentuan internal maupun eksternal, termasuk kewajiban pelaporan kepada Bank Indonesia, Otoritas Jasa Keuangan (OJK), dan Bursa Efek Indonesia (BEI).

Kepatuhan unit kerja terhadap seluruh ketentuan yang berlaku menjadi salah satu objek pengendalian Risiko Kepatuhan yang secara berkala dilaporkan kepada OJK dan institusi terkait lainnya. Secara umum, pelaksanaan Fungsi Kepatuhan Perseroan terhadap ketentuan BI, OJK, dan peraturan perundang-undangan sepanjang tahun 2025 telah berjalan dengan baik.

Adapun aktivitas kepatuhan yang dilaksanakan oleh Divisi Kepatuhan selama tahun 2025 meliputi:
1. Memastikan budaya kepatuhan telah diimplementasikan pada semua tingkatan organisasi dan kegiatan usaha Bank antara lain melalui pelaksanaan program elearning yang diikuti dengan pelaksanaan sertifikasi kepatuhan untuk para officer Bank sesuai dengan bidang yang menjadi tanggungjawabnya. Bank akan menyelesaikan pengembangan elearning bekerjasama dengan HR *(Learning)* sebagai bagian dari pengembangan *e-learning* Bank termasuk materi Anti Pencucian Uang, Pencegahan Pendanaan Terorisme (APUPPT). Untuk Sertifikasi Kepatuhan telah dilakukan kepada 7 (tujuh) orang staf kepatuhan.
2. Mengelola risiko kepatuhan pada tingkatan risiko yang akan diambil *(risk appetite)* oleh Bank dalam rangka mencapai sasaran usaha Bank dengan mengedepankan prinsip kehati-hatian. Penetapan risk appetite tahun 2025 dengan mempertimbangkan banyaknya inovasi produk/aktivitas baru yang akan diluncurkan di tahun 2025.

5. Enforcement of Sanctions and Strengthening of the Compliance Culture
   To instill a culture of compliance across all levels of the organization, the Company imposes sanctions for any violation of applicable regulations. Sanctions are applied proportionally, ranging from performance rating reductions to termination of employment, particularly for violations related to banking-related criminal offenses.

In line with Compliance Risk management, the Company continuously identifies and analyzes factors that may influence such risks, and ensures the implementation of risk management that encompasses policies, human resources, and compliance control systems. The Company also monitors the implementation of operational processes to ensure they remain aligned with both internal and external regulations, including reporting obligations to Bank Indonesia, the Financial Services Authority (OJK), and the Indonesia Stock Exchange (IDX).

Work unit compliance with all applicable regulations is a key focus of Compliance Risk management, which is regularly reported to the OJK and other relevant institutions. Overall, the implementation of the Company's Compliance Function regarding BI, OJK, and regulatory requirements throughout 2025 has proceeded smoothly.

The compliance activities carried out by the Compliance Division in 2025 include:
1. Ensuring that a culture of compliance has been implemented at all levels of the Bank's organization and business operations, including through the implementation of e-learning programs followed by compliance certification for Bank officers in accordance with their respective areas of responsibility. The Bank will complete the development of e-learning in collaboration with HR (Learning) as part of the Bank's e-learning development, which includes material on Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF). Compliance certification has been completed for 7 (seven) compliance staff members.
2. Managing compliance risks within the risk appetite established by the Bank to achieve its business objectives while prioritizing the principle of prudence. The determination of risk appetite in 2025 has considered the number of new product innovations and activities to be launched in 2025.

3. Menerapkan pemberian sanksi yang tegas pada setiap pelaku pelanggaran ketentuan dengan memperhatikan tingkatan pelanggaran dan level jabatan yang melakukan pelanggaran. Hal tersebut dilakukan dalam rangka untuk untuk memastikan agar seluruh kebijakan, ketentuan, sistem dan prosedur serta kegiatan usaha yang dilakukan oleh Bank telah sesuai dengan ketentuan OJK, Bank Indonesia dan peraturan perundang-undangan lainnya yang berlaku.
4. Proses pemberian sanksi pada setiap pelaku pelanggaran ketentuan dilakukan oleh komite sanksi, dengan memperhatikan tingkatan pelanggaran dan level jabatan yang melakukan pelanggaran. Menetapkan kepada seluruh divisi terkait dengan komitmen-komitmen yang dibuat kepada OJK, Bank Indonesia dan/atau otoritas pengawas lain yang berwenang, apabila mengalami pemunduran target penyelesaian maka harus persetujuan Direktur Kepatuhan. Setiap akhir bulan Satuan Kerja Kepatuhan (SKK) memberikan reminder kepada seluruh unit kerja terkait mengenai pemenuhan komitmen kepada OJK, dan setiap rekomitmen yang dilakukan harus disetujui oleh Direktur Bidang sebelum surat penyampaian komitmen ditandatangani oleh Direktur Kepatuhan.
5. Mengawal proses pengajuan perizinan produk dan aktivitas baru sejak tahap perencanaan dalam RBB hingga penyampaian dokumen kepada regulator, dengan peran SKK sebagai *business enabler partner* yang menjunjung tinggi prinsip kepatuhan.
6. Melanjutkan penerapan program APU PPT dan PPPSPM sesuai POJK No. 8 Tahun 2023, termasuk pengembangan aplikasi Web APU & PPT untuk mendukung kebutuhan pelaporan kepada regulator.
7. Melakukan kajian atas ketentuan internal Bank yang berkaitan dengan penerapan APU PPT dan PPPSPM agar tetap selaras dengan POJK No. 8 Tahun 2023.
8. Melakukan pengembangkan Sistem Informasi sebagai upaya penyediaan data secara otomatis untuk pelaporan kepada PPATK

   Melakukan pemeliharaan berkala atas daftar sanksi dan pemantauan pihak berisiko tinggi (DTTOT, PPSPM, UN List, UKUS Sanction List, OFAC, dan lainnya), termasuk penambahan data pihak yang terindikasi terkait aktivitas judi online.
9. Melakukan pelatihan APU PPT dan PPPSPM bagi karyawan, khususnya *first line of defense* di Kantor Pusat dan Kantor Cabang.

3. Enforcing strict sanctions against any violator of regulations, taking into account the severity of the violation and the position level of the violator. This measure is taken to ensure that all policies, regulations, systems, procedures, and business activities conducted by the Bank comply with OJK, Bank Indonesia, and other applicable laws and regulations.
4. The imposition of sanctions on any violator of regulations is carried out by the sanction committee, taking into account the severity of the violation and the position level of the individual involved. All relevant divisions must adhere to the commitments made to the OJK, Bank Indonesia, and/or other authorized supervisory authorities; if there is a delay in meeting completion targets, approval from the Compliance Director is required. At the end of each month, the Compliance Unit (SKK) sends a reminder to all relevant work units regarding the fulfillment of commitments to the OJK, and any re-commitment must be approved by the Division Director before the commitment letter is signed by the Compliance Director.
5. Overseeing the licensing process for new products and activities from the planning stage in the RBB through to the submission of documents to the regulator, with the Compliance Unit (SKK) serving as a business enabler partner that upholds compliance principles.
6. Continue the implementation of the APU PPT and PPPSPM program in accordance with POJK No. 8 of 2023, including the development of the APU & PPT Web application to faciliate reporting to the regulator.
7. Reviewing the Bank's internal regulations related to the implementation of APU PPT and PPPSPM to ensure they remain aligned with POJK No. 8 of 2023.
8. Developing an Information System to facilitate the automatic provision of data for reporting to the Financial Transaction Reports and Analysis Center (PPATK)
   Conduct regular updates to the list of sanctions and monitoring of high-risk parties (DTTOT, PPSPM, UN List, UKUS Sanction List, OFAC, and others), including the addition of data on parties suspected of being involved in online gambling activities.
9. Conducting APU PPT and PPPSPM training for employees, particularly the first line of defense at the Head Office and Branch Offices.

10. Meningkatkan kesadaran atas Program Anti Suap dan Anti Korupsi melalui publikasi *Core Inside (Compliance Regulatory Information and Compliance Awareness Highlight)*.
11. Berkolaborasi dengan unit kerja dalam penyusunan dan pelaporan Rencana Aksi Keuangan Berkelanjutan (RAKB) kepada regulator sesuai ketentuan.
12. Melakukan evaluasi dan penguatan *governance structure*, *governance process*, dan *governance outcome* sebagai bagian dari penilaian komposit GCG Bank.
13. Memperkuat organisasi kepatuhan melalui pengembangan SDM SKK dengan program *capacity building*, khususnya terkait regulasi dan teknologi digital.
14. Meningkatkan budaya kepatuhan secara berkelanjutan melalui program *Core Insight (Co.In)* di seluruh unit kerja dan jaringan cabang.
15. Meningkatkan kualitas keluaran produk advisory yang diterbitkan oleh SKK.
16. Melanjutkan pemantauan dan *enforcement* atas kualitas *review* ketentuan internal Bank guna memastikan keselarasan dengan regulasi terbaru dan hirarki ketentuan yang berlaku.
17. Melakukan kaji ulang kebijakan dan prosedur Bank yang berkaitan dengan penerapan program APU PPT dan PPPSPM.
18. Melakukan evaluasi berkala atas sistem APU dan PPT Bank untuk memastikan efektivitas penerapan dan pemenuhan kewajiban regulasi.
19. Mengevaluasi secara berkala metode analisis Transaksi Keuangan Mencurigakan dengan pendekatan pembobotan agar analisis lebih komprehensif dan sesuai ketentuan.
20. Meninjau infrastruktur serta menyiapkan program penguatan penerapan *Good Corporate Governance* (GCG) Bank.

Sepanjang tahun 2025, terdapat 46 (empat puluh enam) peraturan baru dan/atau revisi yang berdampak terhadap Bank, terdiri dari 11 (sebelas) Peraturan Bank Indonesia, 16 (enam belas) Peraturan Otoritas Jasa Keuangan, dan 18 (delapan belas) peraturan perundang-undangan lainnya. Seluruh ketentuan tersebut telah disosialisasikan kepada Manajemen dan unit kerja terkait, dengan kajian dampak serta tindak lanjut pemenuhannya dilakukan dan dipantau secara kolaboratif oleh unit kepatuhan bersama unit kerja terkait.

10. Raising awareness of the Anti-Bribery and Anti-Corruption Program through the publication of Core Inside (Compliance Regulatory Information and Compliance Awareness Highlight).
11. Collaborating with business units in the preparation and reporting of the Sustainable Finance Action Plan (RAKB) to regulators in accordance with regulations.
12. Conducting evaluations and strengthening the governance structure, governance process, and governance outcomes as part of the Bank's composite GCG assessment.
13. Strengthening the compliance organization through SKK HR development through capacity building programs, particularly regarding regulations and digital technology.
14. Sustainably enhancing the compliance culture through the Core Insight (Co.In) program across all work units and branch networks.
15. Improve the quality of advisory outputs published by the Compliance Unit.
16. Continue monitoring and enforcement of the quality of reviews of the Bank's internal regulations to ensure alignment with the latest regulations and the applicable hierarchy of regulations.
17. Review the Bank's policies and procedures related to the implementation of the APU, PPT, and PPPSPM programs.
18. Conduct periodic evaluations of the Bank's APU and PPT systems to ensure the effectiveness of implementation and compliance with regulatory obligations.
19. Periodically evaluate methods for analyzing Suspicious Financial Transactions using a weighted approach to ensure analysis is comprehensive and compliant with regulations.
20. Review infrastructure and prepare programs to strengthen the implementation of the Bank's Good Corporate Governance (GCG).

Throughout 2025, there were 46 (forty-six) new regulations and/or revisions impacting the Bank, comprising 11 (eleven) Bank Indonesia Regulations, 16 (sixteen) Financial Services Authority Regulations, and 18 (eighteen) other laws and regulations. All of these provisions have been communicated to Management and relevant work units, with impact assessments and follow-up on compliance being conducted and monitored collaboratively by the compliance unit together with the relevant work units

Audit Eksternal
External Audit

Sebagai bagian dari mekanisme pengawasan independen atas aspek keuangan, Bank menyelenggarakan Audit Eksternal yang dilaksanakan oleh Akuntan Publik (AP) dan Kantor Akuntan Publik (KAP). Penunjukan Akuntan Publik dilakukan oleh Pemegang Saham melalui Rapat Umum Pemegang Saham (RUPS). Dalam forum tersebut, kewenangan penetapan Akuntan Publik didelegasikan kepada Dewan Komisaris, yang menetapkan keputusan berdasarkan usulan Direksi, termasuk pertimbangan rasional dan besaran imbal jasa Auditor Eksternal.

Proses penunjukan Auditor Independen telah memenuhi seluruh ketentuan yang berlaku, termasuk pembatasan penggunaan Akuntan Publik, hal ini sejalan dengan Peraturan Otoritas Jasa Keuangan Nomor 9 Tahun 2023 tentang Penggunaan Jasa Akuntan Publik dan Kantor Akuntan Publik dalam Kegiatan Jasa Keuangan.

Dalam menjalankan tugasnya, Auditor Eksternal diwajibkan untuk menjaga independensi dari pengaruh Direksi, Dewan Komisaris, maupun pihakpihak berkepentingan lainnya di Bank. Perseroan menyediakan seluruh catatan akuntansi serta data pendukung yang diperlukan agar Audit Independen dapat memberikan opini secara objektif mengenai kewajaran, kepatuhan, dan kesesuaian Laporan Keuangan Bank dengan Standar Akuntansi Keuangan (SAK) di Indonesia. Selain itu, Auditor Independen berkewajiban untuk menyampaikan kepada Bank apabila ditemukan peristiwa atau kondisi yang tidak sesuai dengan peraturan perundang-undangan yang berlaku.

Penunjukan Kantor Akuntan Publik

Berdasarkan keputusan Rapat Umum Pemegang Saham Tahunan (RUPST) tanggal 27 Mei 2025, Dewan Komisaris memperoleh kewenangan untuk menetapkan dan menunjuk Kantor Akuntan Publik (KAP) yang akan melaksanakan Audit atas Laporan Keuangan Perseroan per 31 Desember 2025. Penetapan tersebut dilakukan dengan mempertimbangkan rekomendasi Komite Audit kepada Dewan Komisaris.

As part of the independent oversight mechanism for financial aspects, the Bank conducts an External Audit through a Public Accountant (AP) and a Public Accounting Firm (KAP). The appointment of the Public Accountant is made by the Shareholders through the General Meeting of Shareholders (GMS). In this forum, the authority to appoint the Public Accountant is delegated to the Board of Commissioners, which decides based on the Board of Directors' proposal, including rational considerations and the fee amount for the External Auditor.

The appointment process for the Independent Auditor has complied with all applicable regulations, including restrictions on the use of Public Accountant, in line with Financial Services Authority Regulation No. 9 of 2023 regarding the Use of Public Accountant and Public Accounting Firm Services in Financial Services Activities.

In performing their duties, the External Auditor is required to remain independent from the influence of the Board of Directors, the Board of Commissioners, or other interested parties within the Bank. The Company provides all necessary accounting records and supporting data so that the Independent Auditor can issue an objective opinion regarding the fairness, compliance, and conformity of the Bank's Financial Statements with Indonesian Financial Accounting Standards (SAK). Furthermore, the Independent Auditor is obligated to notify the Bank if any events or conditions are found that do not comply with applicable laws and regulations.

Appointment of Public Accounting Firm

Pursuant to the resolution of the Annual General Meeting of Shareholders (AGMS) held on May 27, 2025, the Board of Commissioners was granted the authority to nominate and appoint a Public Accounting Firm (KAP) to audit the Company's Financial Statements as of December 31, 2025. This appointment was made in consideration of the Audit Committee's recommendation to the Board of Commissioners.

Dalam rapat Komite Audit yang diselenggarakan pada tanggal 29 Agustus .2025, Komite Audit memutuskan untuk merekomendasikan KAP Purwanto Susanti dan Surja sebagai Auditor Eksternal Perseroan untuk tahun buku yang berakhir pada 31 Desember 2025. Menindaklanjuti rekomendasi tersebut, pada tanggal 24 September 2025, Dewan Komisaris secara resmi menetapkan dan menunjuk KAP Purwanto Susanti dan Surja untuk melaksanakan audit atas Laporan Keuangan Perseroan.

At the Audit Committee meeting held on August 29, 2025, the Audit Committee decided to recommend Purwanto Susanti and Surja as the Company's External Auditor for the fiscal year ending December 31, 2025. Following this recommendation, on September 24, 2025, the Board of Commissioners officially appointed KAP Purwanto Susanti and Surja to conduct the audit of the Company's Financial Statements.

Selama proses audit, KAP Purwanto Susanti dan Surja menunjukkan tingkat independensi, kompetensi, profesionalisme, serta objektivitas yang selaras dengan Standar Profesional Akuntan Publik. Berdasarkan hasil pemeriksaan tersebut, Perseroan memperoleh opini wajar tanpa modifikasian (sebelumnya dikenal sebagai wajar tanpa pengecualian) sesuai dengan Standar Akuntansi Keuangan yang berlaku di Indonesia.

During the audit process, KAP Purwanto Susanti and Surja demonstrated a level of independence, competence, professionalism, and objectivity in line with Public Accountant Professional Standards. Based on the results of the audit, the Company received an unmodified opinion (previously known as an unqualified opinion) in accordance with the Financial Accounting Standards applicable in Indonesia.

Adapun daftar Kantor Akuntan Publik yang ditunjuk oleh Perseroan dalam kurun waktu 5 (lima) tahun terakhir disajikan pada tabel berikut:

The list of Public Accounting Firms appointed by the Company over the past 5 (five) years is presented in the following table:

Tahun Buku Financial Year	**Nama KAP** Name of KAP	**Nama AP** Public Accountant
2025	Purwanto Susanti dan Surja	Yovita
2024	Purwantono, Sungkoro & Surja	Yovita
2023	Purwantono, Sungkoro & Surja	Yovita
2022	Purwantono, Sungkoro & Surja	Yovita
2021	Purwantono, Sungkoro & Surja	Yovita
2020	Kanaka Puradiredja Suhartono	Florus Daeli

Sistem Pengendalian Intern

Internal Control System

Sistem Pengendalian Intern merupakan elemen fundamental dalam manajemen Bank dan menjadi landasan utama bagi terselenggaranya kegiatan operasional yang sehat, aman, dan berkelanjutan. Penerapan Sistem Pengendalian Intern yang efektif mendukung manajemen dalam menjaga aset Bank, memastikan tersedianya pelaporan keuangan dan manajerial yang andal, meningkatkan kepatuhan terhadap ketentuan dan peraturan perundang-undangan, serta meminimalkan potensi kerugian, penyimpangan, dan pelanggaran prinsip kehatihatian.

Penerapan Sistem Pengendalian Intern di BNC mengacu pada Surat Edaran OJK No. 35/SEOJK.03/2017 tentang Pedoman Standar Pengendalian Intern bagi Bank Umum. Implementasi manajemen risiko dan pengendalian intern merupakan tanggung jawab bersama seluruh jajaran manajemen dan karyawan Bank. Oleh karena itu, kesadaran terhadap risiko (*risk awareness*) terus ditanamkan secara berkelanjutan di setiap tingkat organisasi.

Secara berkala, BNC melakukan peninjauan atas kecukupan pemisahan fungsi, penerapan *dual control/dual custody*, serta efektivitas kebijakan dan prosedur pengendalian intern guna memberikan keyakinan yang memadai atas keandalan sistem yang dijalankan.

Kesesuaian Penerapan Sistem Pengendalian Intern dengan COSO

BNC menerapkan Sistem Pengendalian Intern yang mencakup dua aspek utama, yaitu Pengendalian Operasional dan Pengendalian Keuangan. Pelaksanaan pengendalian atas kegiatan operasional dan pelaporan keuangan Bank mengacu pada kerangka kerja internasional *COSO – Internal Control Integrated Framework*, yang terdiri dari lima komponen pengendalian sebagai berikut:

1. Lingkungan Pengendalian;
2. Penilaian Risiko;
3. Aktivitas Pengendalian;
4. Informasi dan Komunikasi; dan
5. Kegiatan Pemantauan.

The Internal Control System is a fundamental element of the Bank's management and serves as the primary foundation for sound, secure, and sustainable operational activities. The implementation of an effective Internal Control System helps the management to protect the Bank's assets, ensure the availability of reliable financial and managerial reporting, enhance compliance with laws and regulations, and minimize the potential for losses, irregularities, and breaches of the principle of prudence.

The implementation of the Internal Control System at BNC is based on OJK Circular Letter No. 35/SEOJK.03/2017 regarding Guidelines on Internal Control Standards for Commercial Banks. The implementation of risk management and internal controls is a shared responsibility of all management and employees of the Bank. Therefore, risk awareness is continuously instilled at every level of the organization.

Periodically, BNC reviews the adequacy of functional segregation, the implementation of dual control/dual custody, and the effectiveness of internal control policies and procedures to provide reasonable assurance regarding the reliability of the systems in operation.

Compliance of the Internal Control System Implementation with COSO

BNC implements an Internal Control System that encompasses two main aspects: Operational Controls and Financial Controls. The control of the Bank's operational activities and financial reporting is based on the international framework COSO – Internal Control Integrated Framework, which consists of the following five control components:

1. Control Environment;
2. Risk Assessment;
3. Control Activities;
4. Information and Communication; and
5. Monitoring Activities.

Evaluasi atas Efektivitas Sistem Pengendalian Intern

BNC melakukan evaluasi Sistem Pengendalian Intern dengan mengacu pada *Internal Control Integrated Framework* yang dikembangkan oleh COSO. Setiap aktivitas pengendalian dirancang dan diterapkan secara terencana untuk mengelola risiko yang berpotensi mempengaruhi kinerja atau menimbulkan kerugian bagi Bank.

Isu-isu yang berkaitan dengan kecukupan pengendalian intern telah disampaikan kepada Direksi, Dewan Komisaris, serta Komite Audit. Atas temuan tersebut, langkah-langkah tindak lanjut telah dilakukan secara konsisten guna meminimalkan risiko dan meningkatkan efektivitas pengendalian intern secara berkelanjutan.

Pernyataan Komite Audit atas Efektivitas Sistem Pengendalian Intern

Komite Audit telah melakukan evaluasi atas penerapan Sistem Pengendalian Intern Perseroan. Berdasarkan hasil evaluasi tersebut, Komite Audit menyimpulkan bahwa Sistem Pengendalian Intern yang diterapkan oleh Perseroan telah berjalan secara efektif dan memadai, mencakup pengendalian keuangan, operasional, serta kepatuhan terhadap seluruh ketentuan dan peraturan perundang-undangan yang berlaku.

Penerapan Pengendalian Intern atas Pelaporan Keuangan (PIPK)

Bank secara konsisten memperkuat kualitas tata kelola perusahaan melalui implementasi Pengendalian Intern atas Pelaporan Keuangan (PIPK) sebagai bagian integral dari penerapan *Good Corporate Governance* (GCG). Inisiatif ini bertujuan untuk memastikan bahwa seluruh proses pelaporan keuangan dilaksanakan secara andal, transparan, dan akuntabel.

Penerapan PIPK di Bank mengacu pada Peraturan Otoritas Jasa Keuangan Nomor 15 Tahun 2024 (POJK No. 15/2024) serta Kerangka *Committee of Sponsoring Organizations of the Treadway Commission* (COSO). Kerangka ini menegaskan pentingnya sistem pengendalian internal yang efektif dalam menjaga integritas dan keandalan laporan keuangan Bank.

Evaluation of the Effectiveness of the Internal Control System

BNC evaluates its Internal Control System in accordance with the Internal Control Integrated Framework developed by COSO. Each control activity is designed and implemented in a planned manner to manage risks that could potentially affect performance or result in losses for the Bank.

Issues related to the adequacy of internal controls have been communicated to the Board of Directors, the Board of Commissioners, and the Audit Committee. In response to these findings, follow-up actions have been consistently implemented to minimize risks and continuously improve the effectiveness of internal controls.

Statement of the Audit Committee on the Effectiveness of the Internal Control System

The Audit Committee has conducted an evaluation of the implementation of the Company's Internal Control System. Based on the results of this evaluation, the Audit Committee concludes that the Internal Control System implemented by the Company has been effective and adequate, encompassing financial, operational, and compliance controls with all applicable laws and regulations.

Implementation of Internal Control over Financial Reporting (ICOFR)

The Bank consistently strengthens the quality of its corporate governance through the implementation of Internal Control over Financial Statements (ICOFR) as an integral part of the implementation of Good Corporate Governance (GCG). This initiative aims to ensure that all financial reporting processes are carried out reliably, transparently, and accountably.

The implementation of ICOFR at the Bank refers to the Financial Services Authority Regulation Number 15 of 2024 (POJK No. 15/2024) as well as the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework. This framework emphasizes the importance of an effective internal control system in maintaining the integrity and reliability of the Bank's financial statements.

Tujuan Strategis

Implementasi PIPK diarahkan untuk mendukung pencapaian tujuan strategis Bank, yaitu memastikan keandalan laporan keuangan, memitigasi risiko kesalahan penyajian yang material (*material misstatement*), serta meningkatkan efektivitas pengendalian internal pada proses bisnis utama. Selain itu, penerapan ini juga memperkuat kepatuhan terhadap ketentuan regulator dan standar akuntansi yang berlaku.

Komitmen terhadap Integritas

Bank menegaskan komitmen yang kuat dalam menjaga integritas pelaporan keuangan melalui penerapan kebijakan anti-intervensi dan anti-manipulasi oleh seluruh pihak terkait. Bank juga terus memperkuat budaya kepatuhan dan kesadaran pengendalian internal di seluruh organisasi.

Kebijakan dan Prosedur Internal Bank terkait PIPK

Sehubungan dengan implementasi PIPK Bank telah menetapkan serangkaian kebijakan dan prosedur internal yang komprehensif yang merupakan acuan dasar bagi Bank dalam mengimplementasikan PIPK sesuai dengan amanat POJK Nomor 15 Tahun 2024 untuk memastikan integritas, kebenaran, dan keakuratan Laporan Keuangan Bank.

Kebijakan dan Prosedur Internal Bank menetapkan secara rinci peran, wewenang, dan tanggung jawab seluruh jajaran organisasi, mencakup Pemegang Saham, Dewan Komisaris, Komite Audit, Direksi, Unit Pelaksana Teknis, Unit Pendukung Kritis, serta Fungsi Pengawasan dan Kepatuhan secara tegas melarang seluruh pihak terkait termasuk Pemegang Saham Pengendali, Pihak Terafiliasi, Direksi, Dewan Komisaris, dan Pejabat Eksekutif untuk melakukan tindakan intervensi atau manipulasi yang dapat mengakibatkan Laporan Keuangan tidak mencerminkan kondisi entitas yang sebenarnya.

Pendekatan dan Kerangka Kerja

Bank mengadopsi pendekatan yang terstruktur dan berbasis risiko dalam implementasi PIPK. Pendekatan ini mencakup penerapan kerangka COSO yang terdiri dari lima komponen utama yaitu *control environment, risk assessment, control activities, information and communication,* serta *monitoring activities*.

Strategic Goals

The implementation of ICOFR aims to support the achievement of the Bank's strategic goals, which are to ensure the reliability of financial statements, mitigate the risks of material misstatement, as well as to improve the effectiveness of internal control in the main business processes. Furthermore, this implementation also strengthens compliance with the applicable regulatory standards and accounting standards.

Commitment to Integrity

The Bank is firmly committed to maintain the integrity of financial reporting through the implementation of anti-intervention and anti-manipulation policies by all relevant units. The Bank also continues to strengthen its compliance culture and awareness on internal control across the organization.

The Bank's Internal Policies and Procedures related to ICOFR

In relation with the implementation of ICOFR, the Bank has established a series of comprehensive internal policies and procedures as a key reference for the Bank in implementing ICOFR based on the POJK Number 15 of 2024, which aims to ensure integrity, validity, and accuracy of the Bank's Financial Statements.

The Bank's Internal Policies and Procedures detail the roles, authorities, and responsibilities of all organizational levels, which include Shareholders, Board of Commissioners, Audit Committee, Board of Directors, Technical Executive Units, Critical Support Units, as well as the Supervision and Compliance Functions, and strictly prohibits all related parties, including Controlling Shareholders, Affiliated Parties, Board of Directors, Board of Commissioners, and Executive Officers to intervene or manipulate anything that could result in the Financial Statements to differ from the actual conditions of the entity.

Approach and Framework

The Bank adopts a structure and risk-based approach in the implementation of ICOFR. This approach covers the implementation of COSO framework, which consists of five key components, including control environment, risk assessment, control activities, information and communication, as well as monitoring activities.

Selain itu, Bank menerapkan *risk-based approach* dengan fokus pada proses bisnis dan akun yang memiliki dampak signifikan terhadap laporan keuangan. Implementasi juga didukung oleh *Three Lines Model* untuk memastikan kejelasan peran dan tanggung jawab antara fungsi operasional, fungsi pengawasan, dan fungsi *assurance* independen.

Struktur Tata Kelola

Implementasi PIPK didukung oleh struktur tata kelola yang kuat dan komprehensif. Dewan Komisaris dan Komite Audit menjalankan fungsi pengawasan strategis, sementara Direksi bertanggung jawab atas efektivitas implementasi. Pada tingkat operasional, *First Line* bertindak sebagai pemilik risiko dan pengendalian, *Second Line* menjalankan fungsi pengawasan risiko dan kepatuhan, serta *Third Line* melalui Satuan Kerja Audit Intern (SKAI) memberikan *assurance* independen atas efektivitas pengendalian internal.

Unit Kerja Khusus (UKK) – Anti Fraud Management (AFM) selaku *Second Line* berperan dalam mengoordinasikan implementasi PIPK, memperkuat upaya pencegahan kecurangan, serta memastikan kesesuaian proses pencatatan dan pengukuran dengan Standar Akuntansi Keuangan (SAK).

Implementasi PIPK di Bank

Dalam mendukung implementasi, Bank telah melakukan analisis kesenjangan (*gap analysis*) atas kebijakan dan prosedur internal PIPK guna memastikan kesesuaian dengan ketentuan regulator, khususnya POJK No. 15 Tahun 2024.

Evaluasi yang mencakup *Entity Level Control* (ELC), *Transaction Level Control* (TLC), serta *Information Technology General Control* (ITGC) melalui *Business Process Mapping* (BPM) menunjukkan bahwa kerangka kebijakan dan prosedur yang dimiliki Bank telah memenuhi persyaratan sebagaimana diatur dalam Pasal 4 ayat (2) huruf e POJK dimaksud.

Ruang lingkup implementasi PIPK mencakup seluruh proses yang memiliki dampak material terhadap pelaporan keuangan. Pelaksanaan dilakukan secara sistematis melalui identifikasi proses bisnis dan akun signifikan, penyusunan *Business Process Mapping* (BPM) dan *Risk Control Matrix* (RCM), serta penetapan dan dokumentasi *key controls*.

Furthermore, the Bank also implements a risk-based approach by focusing on business processes and accounts that significantly affect the financial statements. This implementation is also supported by the Three Lines Model to ensure the clarity of roles and responsibilities between operational functions, supervisory functions, and independent assurance functions.

Governance Framework

The implementation of ICOFR is supported by a strong and comprehensive governance structure. The Board of Commissioners and the Audit Committee carry out strategic supervisory functions, while the Board of Directors is responsible for the effectiveness of its implementation. At operational level, the First Line acts as risk owner and control, while the Second Line carries out risk and compliance supervisory functions, and the Third Line, through the Internal Audit Unit (IAU) provides independent assurance on the effectiveness of the internal control.

The Special Work Unit (UKK) - Anti Fraud Management (AFM), as the Second Line is responsible to coordinate the implementation of ICOFR, enhancing the efforts to prevent fraud, as well as ensuring the conformity of recording and measurement processes with the Financial Accounting Standards (SAK).

Implementation of ICOFR at the Bank

In supporting the implementation, the Bank has conducted gap analysis on internal policies and procedures related to ICOFR in order to ensure their alignment with the regulations, specifically POJK No. 15 of 2024.

Evaluation on Entity Level Control (ELC), Transaction Level Control (TLC), and Information Technology General Control (ITGC) through Business Process Mapping (BPM) indicates that the Bank's policies and procedures framework have complied with the Article 4 paragraph (2) letter e of the POJK.

The scope of ICOFR implementation covers all processes that have material impacts on the financial reporting. The implementation is carried out systematically through identification of business processes and significant accounts, formulation of Business Process Mapping (BOM) and Risk Control Matrix (RCM), as well as the establishment and documentation of key controls.

Selanjutnya, masing-masing *process owner* melaksanakan *Control Self-Assessment* (CSA) sebagai bagian dari penguatan pengendalian internal. Efektivitas pengendalian juga diuji secara berkala melalui pengujian desain dan operasional (*design and operating effectiveness*) guna memastikan pengendalian berjalan sesuai dengan yang diharapkan.

Thereafter, each process owner conducts Control Self-Assessment (CSA) as an effort to strengthen internal control. The effectiveness of control is also being tested regularly through design and operating effectiveness in order to ensure that the internal control is operating as expected.

Bank tengah melaksanakan tahapan implementasi PIPK sesuai dengan POJK No.15/2024 sejak tahun 2025 dengan memprioritaskan pada akun dan transaksi beresiko tinggi (*high risk*) dan ditargetkan akan selesai di tahun 2026.

The Bank has been implementing the ICOFR in accordance with POJK No. 15/2024 since 2025 by prioritizing high risk accounts and transactions, which is expected to finish by 2026.



Sistem Manajemen Risiko
Risk Management System

Penerapan Manajemen Risiko di PT Bank Neo Commerce Tbk (BNC) berpedoman pada Peraturan Otoritas Jasa Keuangan No. 18/POJK.03/2016 tentang Penerapan Manajemen Risiko bagi Bank Umum serta Surat Edaran Otoritas Jasa Keuangan No. 34/SEOJK.03/2016. Kerangka tersebut mencakup empat pilar utama, yaitu:

1. Pengawasan aktif Dewan Komisaris dan Direksi;
2. Kecukupan kebijakan, prosedur, serta penetapan limit;
3. Kecukupan proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko, termasuk sistem informasi Manajemen Risiko; dan
4. Sistem Pengendalian Intern yang menyeluruh.

Kerangka Manajemen Risiko Bank dirancang untuk menyeimbangkan tingkat risiko yang diambil dengan potensi imbal hasil yang diharapkan. Pendekatan ini diwujudkan melalui penetapan *risk appetite* dan *risk tolerance* untuk setiap jenis risiko, pengembangan kebijakan dan prosedur yang relevan, serta penguatan struktur pengendalian internal yang terintegrasi. Selain itu, Bank secara konsisten membangun budaya risiko dengan menanamkan kesadaran risiko kepada seluruh pegawai sebagai bagian dari praktik manajemen risiko yang efektif.

Pengawasan Aktif Dewan Komisaris dan Direksi

Pengawasan aktif Dewan Komisaris dan Direksi terhadap penerapan Manajemen Risiko diatur dalam Surat Keputusan No. SKEP/092/SET/BNC/VII/2025 tanggal 29 Juli 2025 tentang Kebijakan Penerapan Manajemen Risiko. Melalui kebijakan tersebut, Bank menetapkan batasan kewenangan yang jelas sebagai instrumen pengendalian guna memastikan setiap keputusan dan tindakan telah melalui proses evaluasi dan persetujuan sesuai dengan ketentuan yang berlaku.

The implementation of risk management at PT Bank Neo Commerce Tbk (BNC) refers to Financial Services Authority Regulation No. 18/POJK.03/2016 on the Implementation of Risk Management for Commercial Banks and Financial Services Authority Circular Letter No. 34/SEOJK.03/2016. This framework comprises four main pillars, namely:

1. Active supervision by the Board of Commissioners and the Board of Directors;
2. Adequacy of policies, procedures, and limit setting;
3. Adequacy of risk identification, measurement, monitoring, and control processes, including the Risk Management information system; and
4. Comprehensive Internal Control System.

The Bank's Risk Management Framework is designed to balance the level of risk taken with the potential expected return. This approach is realized through the establishment of risk appetite and risk tolerance for each type of risk, the development of relevant policies and procedures, and the strengthening of an integrated internal control structure. Additionally, the Bank consistently fosters a risk culture by instilling risk awareness among all employees as part of effective risk management practices.

Active Supervision by the Board of Commissioners and the Board of Directors

Active supervision by the Board of Commissioners and the Board of Directors regarding the implementation of Risk Management is regulated in Decision Letter No. SKEP/092/SET/BNC/VII/2025 dated July 29, 2025, concerning the Risk Management Implementation Policy. Through this policy, the Bank establishes clear authority limits as a control mechanism to ensure that every decision and action has undergone an evaluation and approval process in accordance with applicable regulations.

Dewan Komisaris dan Direksi secara berkelanjutan melakukan pengawasan melalui rapat kerja rutin yang membahas evaluasi penerapan Manajemen Risiko secara komprehensif. Dalam forum tersebut, dilakukan penelaahan atas kesesuaian implementasi Manajemen Risiko dengan kebijakan yang telah ditetapkan. Upaya ini mencerminkan komitmen manajemen puncak dalam menjaga kualitas pengelolaan risiko demi mendukung keberlanjutan dan pencapaian tujuan Perseroan.

Kecukupan Kebijakan, Prosedur, dan Penetapan Limit

Sejalan dengan dinamika lingkungan internal dan eksternal, Direksi secara berkala melakukan peninjauan atas kecukupan dan efektivitas kebijakan, prosedur, serta penetapan limit risiko. Evaluasi ini disesuaikan dengan tujuan usaha, skala, dan kompleksitas kegiatan Bank, serta mempertimbangkan profil risiko yang dihadapi.

Melalui proses evaluasi yang berkelanjutan, Perseroan memastikan bahwa kebijakan dan prosedur Manajemen Risiko tetap relevan, responsif terhadap perubahan kondisi bisnis, dan mampu mendukung keberlangsungan usaha Bank secara optimal.

Kecukupan Proses Identifikasi, Pengukuran, Pemantauan, dan Pengendalian Risiko serta Sistem Informasi Manajemen Risiko

Bank secara berkesinambungan melakukan kaji ulang dan evaluasi atas penerapan Manajemen Risiko dengan mempertimbangkan perubahan eksposur risiko, dinamika pasar, serta perkembangan aktivitas usaha. Penilaian profil risiko dilakukan dengan mengkombinasikan tingkat risiko yang melekat (*inherent risk*) pada setiap aktivitas fungsional dengan kualitas penerapan Manajemen Risiko.

Evaluasi tersebut mencakup penilaian atas kecukupan:
1. Tata Kelola Risiko;
2. Kerangka Manajemen Risiko;
3. Proses Manajemen Risiko yang meliputi identifikasi, pengukuran, pemantauan, dan pengendalian risiko, sistem informasi Manajemen Risiko, serta kecukupan sumber daya manusia; dan
4. Sistem Pengendalian Risiko.

The Board of Commissioners and the Board of Directors continuously conduct supervision through regular working meetings that comprehensively discuss the evaluation of Risk Management implementation. In these forums, the alignment of Risk Management implementation with established policies is reviewed. These efforts demonstrate the commitment of top management to maintaining the quality of risk management to support the Company's sustainability and the achievement of its objectives.

Adequacy of Policies, Procedures, and Risk Limit Setting

In line with the dynamics of the internal and external environment, the Board of Directors periodically reviews the adequacy and effectiveness of policies, procedures, and risk limit settings. This evaluation is aligned with the Bank's business objectives, scale, and complexity of operations, while considering the existing risk profile.

Through a continuous evaluation process, the Company ensures that Risk Management policies and procedures remain relevant, responsive to changing business conditions, and capable of optimally supporting the Bank's business continuity.

Adequacy of Risk Identification, Measurement, Monitoring, and Control Processes, as well as the Risk Management Information System.

The Bank continuously reviews and evaluates the implementation of Risk Management, taking into account changes in risk exposure, market dynamics, and business activity developments. Risk profile assessments are conducted by combining the inherent risk associated with each functional activity with the quality of Risk Management implementation.

This evaluation includes an assessment of the adequacy of:
1. Risk Governance;
2. Risk Management Framework;
3. Risk Management Processes, which include risk identification, measurement, monitoring, and control, the Risk Management Information System, and the adequacy of human resources; and
4. Risk Control Systems.

Berdasarkan hasil Penilaian Risiko Perseroan per 31 Desember 2025, tingkat risiko yang melekat (*inherent risk*) berada pada kategori Moderate, sementara kualitas penerapan Manajemen Risiko dinilai *Satisfactory* sehingga secara komposit penilaian Profil Risiko Perseroan dinilai *Low to Moderate.*

Sistem Pengendalian Intern yang Menyeluruh

Perseroan secara berkala melakukan penilaian atas kecukupan dan efektivitas Sistem Pengendalian Intern yang diterapkan. Penilaian tersebut mencakup lima elemen utama yang saling terkait, yaitu pengawasan manajemen dan budaya pengendalian, identifikasi dan penilaian risiko, aktivitas pengendalian serta pemisahan fungsi, sistem akuntansi serta informasi dan komunikasi, serta kegiatan pemantauan dan tindakan korektif atas penyimpangan atau kelemahan yang teridentifikasi.

Penilaian dilakukan oleh Satuan Kerja Audit Intern, dengan mempertimbangkan pula temuan dari auditor eksternal, termasuk hasil pemeriksaan OJK dan Kantor Akuntan Publik yang ditunjuk Perseroan. Secara umum, hasil evaluasi atas kecukupan dan efektivitas Sistem Pengendalian Intern Perseroan per 31 Desember 2025 berada pada kategori *Moderate.*

Efektivitas Penerapan Manajemen Risiko

Penerapan Manajemen Risiko di BNC bertujuan untuk menjaga aset dan permodalan Bank, mendukung pengambilan keputusan yang berkualitas, mengoptimalkan profil *risk return*, meningkatkan nilai perusahaan, serta melindungi reputasi Bank. Implementasi Manajemen Risiko dilakukan dengan mengacu pada POJK No. 18/POJK.03/2016 melalui kerangka Tata Kelola Manajemen Risiko yang mencakup tahapan identifikasi, pengukuran, pemantauan, dan pengendalian risiko pada seluruh level organisasi.

Based on the results of the Company's Risk Assessment as of December 31, 2025, the level of inherent risk is categorized as Moderate, while the quality of risk management implementation was assessed as "Satisfactory", resulting in an overall Risk Profile rating of "Low to Moderate" on a composite basis.

Comprehensive Internal Control System

The Company periodically assesses the adequacy and effectiveness of the Internal Control System in place. This assessment covers five interrelated key elements: management oversight and control culture, risk identification and assessment, control activities and segregation of duties, accounting systems as well as information and communication, and monitoring activities and corrective actions regarding identified deviations or weaknesses.

The assessment is conducted by the Internal Audit Unit, while also taking into account findings from external auditors, including the results of examinations by the OJK and the Public Accounting Firm appointed by the Company. In general, the evaluation results regarding the adequacy and effectiveness of the Company's Internal Control System as of December 31, 2025, fall into the Moderate category.

Effectiveness of Risk Management Implementation

The implementation of Risk Management at BNC aims to safeguard the Bank's assets and capital, support quality decision-making, optimize the risk-return profile, enhance corporate value, and protect the Bank's reputation. Risk Management is implemented in accordance with POJK No. 18/POJK.03/2016 through a Risk Management Governance framework that encompasses the stages of risk identification, measurement, monitoring, and control at all organizational levels.

Prinsip pengelolaan risiko Perseroan diarahkan untuk mendukung pertumbuhan yang sehat dan berkelanjutan, sekaligus menjaga tingkat *risk adjusted return* dan nilai pemegang saham. Efektivitas penerapan Manajemen Risiko ditopang oleh kecukupan struktur organisasi, kompetensi sumber daya manusia dalam memahami prinsip risiko dan imbal hasil, serta penerapan metode pengendalian risiko yang sesuai. Dalam rangka memperkuat kompetensi tersebut, BNC telah memenuhi ketentuan OJK No. 7/25/PBI/2005 terkait Sertifikasi Manajemen Risiko bagi Pengurus dan Pejabat Bank Umum.

Penilaian Dewan Komisaris dan Direksi terhadap Pelaksanaan Manajemen Risiko

Peran aktif Dewan Komisaris dan Direksi menjadi faktor kunci dalam memastikan efektivitas penerapan Manajemen Risiko dan Sistem Pengendalian Intern. Berdasarkan tingkat risiko usaha selama tahun 2025, Profil Risiko Inheren Perseroan berada pada kategori *Moderate*. Sepanjang tahun buku, Bank mampu menjalankan kegiatan usaha secara normal dan tidak menghadapi isu signifikan yang berdampak material terhadap operasional.

Hasil *self-assessment* profil risiko Bank untuk periode yang berakhir pada 31 Desember 2025 menunjukkan bahwa peringkat risiko komposit berada pada tingkat *Low to Moderate,* dengan Risiko Inheren dinilai *Moderate* dan tingkat kualitas penerapan Manajemen Risiko dinilai *Satisfactory.*

Company's risk management principles are designed to support healthy and sustainable growth while maintaining the level of risk-adjusted return and shareholder value. The effectiveness of Risk Management implementation is supported by an adequate organizational structure, human resource competencies in understanding risk and return principles, and the application of appropriate risk control methods. To strengthen these competencies, BNC has complied with OJK Regulation No. 7/25/PBI/2005 concerning Risk Management Certification for the Management and Officers of Commercial Banks.

Assessment by the Board of Commissioners and the Board of Directors on the Implementation of Risk Management

The active role of the Board of Commissioners and the Board of Directors is a key factor in ensuring the effectiveness of the implementation of Risk Management and the Internal Control System. Based on the level of business risk during 2025, the Company's Inherent Risk Profile falls into the Low to Moderate category. Throughout the fiscal year, the Bank was able to conduct business operations normally and did not face significant issues that had a material impact on operations.

The results of the self-assessment of the Bank's risk profile for the period ending December 31, 2025, indicate that the composite risk rating is rated at a Low to Moderate level, with the Inherent Risk assessed as Moderate and the quality of Risk Management implementation assessed as Satisfactory.

Permasalahan Hukum yang Dihadapi Perseroan di Tahun 2025

Legal Cases Faced by the Company in 2025

Sepanjang tahun 2025, permasalahan hukum yang dihadapi oleh Bank tidak memberikan dampak signifikan terhadap kegiatan usaha maupun kondisi keuangan Perseroan. Upaya mitigasi risiko hukum dilakukan secara berkelanjutan melalui Divisi Legal, unit kerja Litigasi. Rincian permasalahan hukum yang dihadapi Bank selama tahun 2025 disajikan pada berikut:

Throughout 2025, the legal cases faced by the Bank did not have a significant impact on the Company's business operations or financial condition. Legal risk mitigation efforts were carried out consistently through the Litigation Unit of the Legal Division. Details of the legal cases faced by the Bank during 2025 are presented below:

Permasalahan Hukum Legal Case	**Jumlah Kasus** Total Case	
	Perdata Civil	**Pidana** Criminal
Telah mendapatkan putusan yang mempunyai kekuatan hukum tetap Have received a decision that has permanent legal force	2	0
Dalam proses penyelesaian In settlement process	0	2
Total	2	2

Kode Etik

Code of Conduct

Kode Etik merupakan landasan penting bagi Perseroan dalam menjaga reputasi, integritas, dan citra Bank yang sejalan dengan prinsip Tata Kelola Perusahaan yang Baik (GCG). Kode Etik Bank Neo Commerce Tbk mengatur standar perilaku dan etika kerja seluruh insan Bank, dengan ketentuan sebagai berikut:

1. Setiap Karyawan wajib menunjukkan sikap dan perilaku yang berlandaskan nilai integritas, profesionalisme, dan tanggung jawab, baik dalam berkomunikasi maupun dalam menjalankan tugas dan tanggung jawab seharihari.
2. Karyawan wajib melaksanakan pekerjaan secara jujur, tertib, cermat, dan penuh dedikasi demi kepentingan Perseroan.
3. Karyawan bertanggung jawab menjaga kebersihan serta menciptakan lingkungan kerja yang kondusif, harmonis, dan saling menghormati.
4. Karyawan wajib memberikan pelayanan terbaik dengan menjunjung tinggi etika kesopanan, kesusilaan, serta norma pergaulan yang berlaku di lingkungan Perseroan.

The Code of Conduct serves as a vital foundation for the Company in safeguarding the Bank's reputation, integrity, and image in accordance with the principles of Good Corporate Governance (GCG). The Code of Conduct of Bank Neo Commerce Tbk sets out the behavioral standards and work ethics for all Bank employees, as follows:

1. Every employee must demonstrate attitudes and behavior that are based on the values of integrity, professionalism, and responsibility, both in communication and in carrying out daily duties and responsibilities.
2. Employees must perform their work honestly, orderly, carefully, and with full dedication for the benefit of the Company.
3. Employees are responsible for keeping the workplace clean and creating a conducive, harmonious, and mutually respectful work environment.
4. Employees must provide the best service while upholding the ethics of politeness, decency, and social norms applicable within the Company.

5. Karyawan berkewajiban menjaga, menggunakan dan memelihara sarana serta prasarana milik Perseroan yang digunakan dalam pelaksanaan tugas.
6. Karyawan wajib menyampaikan data yang benar serta melaporkan setiap perubahan data pribadi kepada Perseroan secara tepat waktu.
7. Setiap ketidakhadiran karyawan wajib diberitahukan kepada atasan langsung secara tertulis sesuai ketentuan yang berlaku.
8. Karyawan wajib menghindari benturan kepentingan, baik yang berasal dari kepentingan pribadi maupun pihak lain, yang dapat bertentangan dengan kepentingan Perseroan.
9. Karyawan bertanggung jawab menjaga keamanan dan kerahasiaan informasi Perseroan, baik dalam bentuk dokumen fisik maupun elektronik, dari risiko kebocoran atau penyalahgunaan oleh pihak yang tidak berwenang.
10. Karyawan dilarang melakukan perbuatan tercela yang dapat merugikan reputasi profesi maupun Perseroan.

Pengungkapan Pemberlakuan Kode Etik

1. Dewan Komisaris dan Direksi
   Pemberlakuan Kode Etik merupakan wujud komitmen Dewan Komisaris dan Direksi yang ditetapkan melalui Surat Keputusan Direksi serta diketahui serta disetujui oleh Dewan Komisaris. Dengan demikian, seluruh anggota Direksi dan Dewan Komisaris terikat dan berkewajiban untuk mematuhi serta menjadi teladan dalam penerapan Kode Etik di lingkungan Perseroan.

2. Karyawan Perseroan
   Perseroan menyadari bahwa pemahaman yang baik terhadap Kode Etik merupakan kunci keberhasilan penerapannya. Oleh karena itu, Bank secara aktif melakukan sosialisasi kepada seluruh karyawan melalui berbagai media komunikasi internal agar Kode Etik dapat dipahami dan dijalankan secara konsisten di seluruh jenjang organisasi.

5. Employees are obligated to safeguard, use, and maintain the Company's facilities and equipment used in the performance of their duties.
6. Employees must provide accurate information and report any changes to their personal data to the Company in a timely manner.
7. Each employee's absence must be notified to their immediate supervisor in writing, as required by applicable regulations.
8. Employees must avoid conflicts of interest, both personal and from other parties, which may conflict with the interests of the Company.
9. Employees are responsible for safeguarding the security and confidentiality of the Company's information, whether in physical or electronic form, from the risk of leakage or misuse by unauthorized parties.
10. Employees are prohibited from engaging in misconduct that could harm the reputation of the profession or the Company.

Disclosure of the Code of Conduct Implementation

1. Board of Commissioners and Board of Directors
   The implementation of the Code of Conduct is a form of commitment by the Board of Commissioners and the Board of Directors, established through a Board of Directors Decree, as well as acknowledged and approved by the Board of Commissioners. Thus, all members of the Board of Directors and the Board of Commissioners are bound and obligated to comply with and serve as role models in the application of the Code of Conduct within the Company.
2. Company Employees
   The Company is aware that a strong understanding of the Code of Conduct is key to its successful implementation. Therefore, the Bank actively socializes the Code of Conduct to all employees through various internal communication channels so that it can be understood and consistently implemented at all levels of the organization.

Selain melalui Surat Keputusan, Perseroan juga menyelenggarakan kegiatan sosialisasi Kode Etik pada tahun 2025 yang dihadiri oleh 911 karyawan. Di samping itu, sejak 8 Mei 2015 Perseroan mewajibkan seluruh jajaran, termasuk Direksi, Dewan Komisaris, dan karyawan, untuk menandatangani Pakta Integritas sebagai bentuk komitmen terhadap kepatuhan pada prinsip-prinsip Kode Etik serta standar etika profesi di industri perbankan.

Sanksi Pelanggaran Kode Etik

Perseroan telah menetapkan mekanisme sanksi bagi karyawan yang terbukti melakukan pelanggaran terhadap Kode Etik. Ketentuan mengenai sanksi tersebut diatur dalam Pakta Integritas dan telah disosialisasikan sehingga dipahami oleh seluruh karyawan.

Sepanjang tahun 2025, Perseroan menjatuhkan sebanyak 30 sanksi atas pelanggaran Kode Etik. Penerapan sanksi ini merupakan bagian dari komitmen Bank dalam menegakkan disiplin kerja serta memastikan kepatuhan seluruh insan Perseroan terhadap ketentuan yang berlaku.

Other than through the Decree, the Company also held a Code of Conduct socialization event in 2025, which was attended by 911 employees. Furthermore, since May 8, 2015, the Company has required all personnel, including the Board of Directors, the Board of Commissioners, and employees, to sign an Integrity Pact as a commitment to compliance with the principles of the Code of Ethics and professional ethical standards in the banking industry.

Sanctions for Code of Conduct Violations

The Company has established a sanctions mechanism for employees proven to have violated the Code of Conduct. The provisions regarding these sanctions are set forth in the Integrity Pact and have been communicated to ensure all employees understand them.

Throughout 2025, the Company imposed a total of 30 sanctions for Code of Conduct violations. The application of these sanctions is part of the Bank's commitment to upholding work discipline and ensuring compliance by all Company personnel with applicable regulations.

Penyediaan Dana Kepada Pihak Terkait dan Penyediaan Dana Besar

Funding to Related Parties and Large Exposures

Informasi mengenai Penyediaan Dana kepada Pihak Terkait (*Related Party*) dan Penyediaan Dana Besar (*Large Exposure*) per posisi 31 Desember 2025 disajikan dalam tabel berikut:

Information regarding funding to related parties and large exposures as of December 31, 2025, is presented in the following table:

Penyediaan Dana Provision of Funds	**Jumlah** Total	
	Debitur Debtors	**Nominal (Rp Juta)** (Million Rp)
Kepada Pihak Terkait To Related Parties	1	19.802
Kepada Debitur Utama To Core Debtors		
Individu Individual	23	1.131.989
Grup Group	2	397.888

Per 31 Desember 2025, penyediaan dana kepada pihak terkait diberikan kepada 1 (satu) debitur dengan nilai Rp19,8 miliar atau sebesar 0,22% dari total penyediaan dana Bank sebesar Rp7.182,58 miliar. Seluruh penyediaan dana tersebut dijamin dengan Agunan Tunai (*back to back*).

As of December 31, 2025, funding to related parties was provided to 1 (one) debtor with a value of Rp19.8 billion, or 0.22% of the Bank's total funding of Rp7,182.58 billion. The entire amount of this funding is secured by cash collateral (back-to-back).

Sementara itu, penyediaan dana besar per 31 Desember 2025 meliputi:

1. Sebanyak 23 (dua puluh tiga) debitur inti individual dengan total nominal Rp1.131,99 miliar atau sebesar 15,8% dari total penyediaan dana Perseroan.
2. Sebanyak 2 (dua) debitur inti grup dengan total nominal Rp397,88 miliar atau sebesar 5,5% dari total penyediaan dana Perseroan.

Meanwhile, large exposures as of December 31, 2025, includes:

1. A total of 23 (twenty-three) individual core debtors, with an aggregate amount of IDR 1,131.99 billion, representing 15.8% of the Company's total fund placements.
2. A total of 2 (two) core debtor groups, with an aggregate amount of IDR 397.88 billion, representing 5.5% of the Company's total fund placements.

Penerapan Strategi Anti Fraud & Pelaporan Pelanggaran (*Whistleblowing System*)

Implementation of the Anti-Fraud Strategy & Whistleblowing System

Sebagai bentuk komitmen manajemen dalam mencegah terjadinya *fraud*, Perseroan telah menetapkan Kebijakan Penerapan Strategi Anti Fraud yang dilaksanakan melalui sistem pengendalian *fraud* secara efektif dan berkelanjutan. Pedoman Kebijakan tersebut juga mencakup ketentuan mengenai Pelaporan Pelanggaran atau *Whistleblowing System* (WBS).

Perseroan memandang penting integrasi antara kebijakan pencegahan *fraud* dan WBS dalam satu pedoman guna menjaga integritas, transparansi, serta kepercayaan di lingkungan kerja. Pendekatan ini juga bertujuan memastikan kegiatan usaha Perseroan berjalan sesuai ketentuan peraturan perundang-undangan serta melindungi kepentingan para pemangku kepentingan.

Sistem pengendalian *fraud* diarahkan untuk membantu Perseroan dalam menetapkan langkahlangkah pencegahan, pendeteksian, investigasi, serta pemantauan atas potensi dan kejadian *fraud*. Tujuan penerapan kebijakan anti *fraud* meliputi:

- Menumbuhkan budaya anti *fraud* di seluruh lingkungan Perseroan;
- Meningkatkan kesadaran dan kepedulian terhadap risiko *fraud* dalam kegiatan operasional; dan
- Menjadi pengingat bagi seluruh pelaksana operasional agar senantiasa mematuhi prosedur dan ketentuan yang berlaku.

Perseroan menerapkan Strategi Anti *Fraud* yang terdiri dari empat pilar utama sebagai berikut:

1. Pencegahan
   Pencegahan dilakukan melalui berbagai perangkat untuk menurunkan potensi risiko *fraud*, antara lain:
   a. Anti *Fraud Awareness*
      Perseroan secara berkelanjutan meningkatkan kesadaran dan kewaspadaan karyawan terhadap risiko *fraud*, antara lain melalui media edukasi seperti komik anti *fraud*.
   b. Identifikasi Kerawanan
      Perseroan melakukan identifikasi dan analisis kerawanan untuk menilai potensi risiko *fraud* yang melekat pada setiap aktivitas yang berpotensi menimbulkan kerugian.

As a demonstration of management's commitment to preventing fraud, the Company has established a policy on Anti-Fraud Strategy, which is implemented through an effective and sustainable fraud control system. This policy also includes provisions regarding the Whistleblowing System (WBS).

The Company believes that it is important to integrate fraud prevention policies and the WBS into a single guideline to maintain integrity, transparency, and trust in the workplace. This approach also aims to ensure that the Company's business activities comply with applicable laws and regulations as well as protect the interests of stakeholders.

The fraud control system is designed to assist the Company in establishing preventive measures, detection, investigation, and monitoring of potential and actual fraud incidents. The objectives of the anti-fraud policy include:

- Fostering an anti-fraud culture throughout the Company;
- Raising awareness and concern regarding fraud risks in operational activities; and
- Serving as a reminder to all operational staff to consistently adhere to applicable procedures and regulations.

The Company implements an Anti-Fraud Strategy that consists of the following four main pillars:

1. Prevention
   Prevention is carried out through various measures to reduce potential fraud risks, including:
   a. Anti-Fraud Awareness
      The Company continuously raises employee awareness and vigilance regarding fraud risks, including through educational materials such as anti-fraud comics.
   b. Vulnerability Identification
      The Company conducts vulnerability identification and analysis to assess potential fraud risks inherent in every activity that could result in losses.

c. *Know Your Employee* (KYE)
Kebijakan *Know Your Employee* diterapkan melalui proses rekrutmen yang selektif, termasuk pemeriksaan rekam jejak dan *SLIK checking*, serta penerapan mekanisme *reward and punishment*, rotasi jabatan, cuti wajib, dan pemantauan karakter, perilaku, serta gaya hidup karyawan.

2. Deteksi
Upaya deteksi dilakukan untuk mengidentifikasi dan menemukan indikasi *fraud* melalui:
a. Kebijakan dan mekanisme *Whistleblowing*.
b. Penyusunan sistem pelaporan pelanggaran yang mendorong karyawan dan pejabat Perseroan untuk melaporkan indikasi *fraud*.
c. *Surprise audit* pada unit kerja berisiko tinggi guna meningkatkan kewaspadaan dalam pelaksanaan tugas.
d. *Surveillance system* melalui pendekatan *continuous auditing* dengan penggunaan indikator *red flag* dan *fraud detection system*.

3. Investigasi, Pelaporan, dan Sanksi
Perseroan menindaklanjuti setiap pengaduan yang diterima melalui proses investigasi oleh tim terkait. Setiap pelanggaran yang terbukti akan dikenakan sanksi sesuai ketentuan yang berlaku.

4. Pemantauan, Evaluasi, dan Tindak Lanjut
Unit Kerja Anti *Fraud* secara berkelanjutan melakukan pemantauan, evaluasi, dan tindak lanjut atas kejadian *fraud* serta pelaksanaan komitmen perbaikan yang telah ditetapkan.

Kebijakan Whistleblowing System (WBS)

Perseroan memiliki kebijakan WBS yang mengatur pengelolaan laporan pelanggaran, dengan ketentuan sebagai berikut:
1. Kanal Pelaporan
WBS merupakan sarana bagi pemangku kepentingan untuk melaporkan indikasi pelanggaran yang terjadi di lingkungan Perseroan atau yang diduga dilakukan oleh pihak internal. Kanal pelaporan yang tersedia meliputi:

c. Know Your Employee (KYE)
The Know Your Employee policy is implemented through a selective recruitment process, including background checking and SLIK checking, as well as the application of reward and punishment mechanisms, job rotation, mandatory leave, and monitoring of employees' character, behavior, and lifestyle.

2. Detection
Detection efforts are carried out to identify and uncover indications of fraud through:
a. Whistleblowing policies and mechanisms.
b. Establishment of a whistleblowing system that encourages employees and Company officials to report indications of fraud.
c. Surprise audits of high-risk work units to enhance vigilance in the performance of duties.
d. Surveillance system through a continuous auditing approach using red flag indicators and a fraud detection system.

3. Investigation, Reporting, and Sanctions
The Company follows up on every complaint received through an investigation process conducted by the relevant team. Any proven violation will be subject to sanctions in accordance with applicable regulations.

4. Monitoring, Evaluation, and Follow-Up
The Anti-Fraud Unit continuously monitors, evaluates, and follows up on fraud incidents as well as the implementation of established improvement commitments.

Whistleblowing System (WBS) Policy

The Company has a WBS policy which regulates the management of violation reports, with the following provisions:
1. Reporting Channels
The WBS is a platform for stakeholders to report indications of violations occurring within the Company or allegedly committed by internal parties. The available reporting channels include:

a. Website: https://www.bankneocommerce.co.id/id/whistleblowing
b. SMS/WhatsApp: 081119178953

2. Pihak Pengelola Pelaporan
Pengelolaan laporan WBS dilakukan oleh Unit Kerja Anti Fraud. Kerahasiaan identitas pelapor, isi laporan, serta jalur pelaporan dijaga sepenuhnya.

3. Isi Laporan
Pelapor wajib menyampaikan informasi pelanggaran secara jelas dan dapat dipertanggungjawabkan, meliputi jenis pelanggaran, pihak yang terlibat, waktu dan lokasi kejadian, kronologis peristiwa, serta bukti pendukung.

4. Pemantauan, Evaluasi, dan Tindak Lanjut
Perseroan berkomitmen untuk melindungi setiap pelapor yang menyampaikan laporan dengan itikad baik. Perlindungan diberikan dari segala bentuk ancaman, intimidasi, tindakan tidak menyenangkan, termasuk perlindungan hukum sesuai ketentuan yang berlaku.

Jumlah Pengaduan Fraud dan WBS Tahun 2025

Informasi mengenai jumlah pengaduan *fraud* dan laporan melalui *Whistleblowing System* selama tahun 2025 disajikan dalam tabel berikut:

a. Website: https://www.bankneocommerce.co.id/id/whistleblowing
b. SMS/WhatsApp: 081119178953

2. Reporting Management Unit
WBS reports are managed by the Anti-Fraud Unit. The confidentiality of the whistleblower's identity, the content of the report, and the reporting channel is fully safeguarded.

3. Report Content
Whistleblowers must provide clear and verifiable information regarding the violation, including the type of violation, parties involved, time and location of the incident, chronology of events, and supporting evidence.

4. Monitoring, Evaluation, and Follow-Up
The Company is committed to protecting every whistleblower who submits a report in good faith. Protection is provided against all forms of threats, intimidation, and unwelcome actions, including legal protection in accordance with applicable regulations.

Number of Fraud and WBS Reports in 2025

Information regarding the number of fraud and whistleblowing reports submitted through the Whistleblowing System during 2025 is presented in the following table:

Jumlah Laporan Masuk Number of Incoming Reports	**Kanal Pelaporan** Reporting Channels			**Hasil Analisa Laporan** Report Analysis Results		**Status Tindak Lanjut** Follow Up Status	
	Email	**SMS/ WhatsApp**	**Website WBS**	**NonFraud**	**Fraud**	**Proses** On-Process	**Selesai** Complete
349	265	-	84	84	265	-	349

Informasi *Buy Back Shares* & Obligasi, Serta Penambahan Modal Melalui *Right Issue*

Information on Share & Bonds Buyback, as well as Capital Increases via Rights Issues

Sepanjang tahun 2025, BNC tidak melakukan aksi korporasi seperti pembelian kembali saham & obligasi, penyertaan modal, pemecahan saham (*stock split*), penggabungan saham (*reverse stock*), saham bonus atau perubahan nilai nominal saham.

Throughout 2025, BNC did not conduct any corporate actions such as share and bond buybacks, capital injections, stock splits, reverse stock splits, bonus shares, or changes to the par value of shares.

Akses Informasi dan Data Perseroan

Access to Company Information and Data

Perseroan senantiasa menjunjung tinggi prinsip keterbukaan informasi dengan menyediakan akses data dan informasi yang komprehensif, akurat, serta mudah dijangkau oleh pemegang saham, pemangku kepentingan, dan masyarakat umum. Informasi resmi Perseroan dapat diakses melalui situs web www.bankneocommerce.co.id yang tersedia dalam Bahasa Indonesia dan Bahasa Inggris.

The Company consistently upholds the principle of transparency by providing comprehensive, accurate, and easily accessible data and information to shareholders, stakeholders, and the general public. Official Company information can be accessed via the website www.bankneocommerce.co.id, available in Indonesian and English.

Selain melalui situs web, pemangku kepentingan juga dapat memperoleh informasi langsung melalui kantor pusat Perseroan yang beralamat di:

Besides the website, stakeholders can also obtain information directly at the Company's head office at:

Treasury Tower

Lantai 60, Kawasan District 8 Lot 28
Jl. Jend. Sudirman Kav. 52–53, Senayan
Kebayoran Baru, Jakarta Selatan | South Jakarta 12190

(021) 2975 2975, 2975 2999

corsec@bankneo.co.id

www.bankneocommerce.co.id



Sebagai bagian dari komitmen transparansi, Perseroan secara berkala menyampaikan keterbukaan kepada pemegang saham dan pemangku kepentingan, diantaranya Laporan Tahunan dan Laporan Keuangan Triwulan.

As part of its commitment to transparency, the Company regularly provides information to shareholders and stakeholders, which includes the Annual Report and Quarterly Financial Reports.

Penerapan Pedoman Tata Kelola Perusahaan Terbuka

Implementation of the Public Company Governance Guidelines

Dalam mengimplementasikan Tata Kelola Perusahaan yang Baik (*Good Corporate Governance*), Perseroan sebagai Perusahaan Terbuka mengacu pada Peraturan Otoritas Jasa Keuangan Nomor 21/POJK.04/2015 serta Surat Edaran Otoritas Jasa Keuangan Nomor 32/SEOJK.04/2015 tentang Pedoman Tata Kelola Perusahaan Terbuka.

Pedoman tersebut diterapkan melalui lima aspek utama yang mencerminkan rekomendasi pelaksanaan tata kelola, yaitu:

1. Hubungan Perseroan dengan Pemegang Saham dalam menjamin pemenuhan hakhak pemegang saham;
2. Fungsi dan peran Dewan Komisaris;
3. Fungsi dan peran Direksi;
4. Partisipasi Pemangku Kepentingan; dan
5. Keterbukaan Informasi.

In implementing Good Corporate Governance, the Company, as a Public Company, refers to Financial Services Authority Regulation No. 21/POJK.04/2015 and Financial Services Authority Circular Letter No. 32/SEOJK.04/2015 regarding Guidelines for Corporate Governance of Public Companies.

These guidelines are implemented through five key aspects that reflect governance implementation recommendations, as follows:

1. The Company's relationship with shareholders to ensure the fulfillment of shareholders' rights;
2. The functions and roles of the Board of Commissioners;
3. The functions and roles of the Board of Directors;
4. Stakeholder participation; and
5. Information Disclosure.

Prinsip dan Rekomendasi Tata Kelola
Governance Principles and Recommendations

Rekomendasi Recomendation	Keterangan Descriptions
A Hubungan Perusahaan dengan Pemegang Saham dalam Menjamin Hak-hak Pemegang Saham The Company's Relations with Shareholders in Assuring the Rights of Shareholders	
1 Meningkatkan Nilai Penyelenggaraan Rapat Umum Pemegang Saham (RUPS) Increasing the Value of Conducting General Meeting of Shareholders (GMS)	
1.1 Perseroan memiliki cara atau prosedur teknis pengumpulan suara (voting) baik secara terbuka maupun tertutup yang mengedepankan independensi dan kepentingan pemegang saham. The Company has a method or technical procedure for voting, both open and closed, which promotes independence and the interests of shareholders.	Terpenuhi Fulfilled
1.2 Seluruh anggota Direksi dan anggota Dewan Komisaris Perseroan hadir dalam RUPS Tahunan. The entire members of the Company's Board of Directors and members of the Board of Commissioners attend the Annual GMS.	Terpenuhi Fulfilled
1.3 Ringkasan risalah RUPS tersedia dalam Situs Web Perseroan paling sedikit selama 1 (satu) tahun. Summary of GMS minutes is available on the Company's Website for at least 1 (one) year.	Terpenuhi Fulfilled
2 Meningkatkan Kualitas Komunikasi dengan Pemegang Saham atau Investor. Improving Quality of Communication with Shareholders or Investors.	
2.1 Perseroan memiliki suatu kebijakan komunikasi dengan Pemegang Saham atau Investor. The company has issued a communication policy with shareholders or investors.	Terpenuhi Fulfilled
2.2 Perseroan mengungkapkan kebijakan komunikasi dengan Pemegang Saham atau Investor dalam Situs Web. The Company discloses its communication policy with shareholders or investors on the Company's Website.	Terpenuhi Fulfilled
B Fungsi dan Peran Dewan Komisaris Functions and Roles of the Board of Commissioners	
3 Meningkatkan Kualitas Komunikasi dengan Pemegang Saham atau Investor. Improving Quality of Communication with Shareholders or Investors.	
3.1 Penentuan jumlah anggota Dewan Komisaris mempertimbangkan kondisi Perseroan. Determination of the number of members of the Board of Commissioners by considering the Company's condition.	Terpenuhi Fulfilled
3.2 Penentuan komposisi anggota Dewan Komisaris memperhatikan keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. Determination of the composition of members of the Board of Commissioners by considering the diversity of skills, knowledge and experience required.	Terpenuhi Fulfilled
4 Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Dewan Komisaris Improving Quality of Duties and Responsibilities of the Board of Commissioners	
4.1 Dewan Komisaris mempunyai kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Dewan Komisaris. The Board of Commissioners has issued a selfassessment policy to assess the Board of Commissioners' performance.	Terpenuhi Fulfilled
4.2 Kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Dewan Komisaris, diungkapkan melalui Laporan Tahunan Perseroan. Selfassessment policy to assess the Board of Commissioner's performance is disclosed in the Company's Annual Report.	Terpenuhi Fulfilled

Rekomendasi Recomendation	Keterangan Descriptions
4.3 Dewan Komisaris mempunyai kebijakan terkait pengunduran diri anggota Dewan Komisaris apabila terlibat dalam kejahatan keuangan. The Board of Commissioners has issued a policy concerning the resignation of members of the Board of Commissioners in the event that they are involved in financial crimes.	Terpenuhi Fulfilled
4.4 Dewan Komisaris atau Komite yang menjalankan fungsi Nominasi dan Remunerasi menyusun kebijakan suksesi dalam proses Nominasi anggota Direksi. The Board of Commissioners or Committee tasked with the Nomination and Remuneration functions develop a succession policy in the Nomination process for members of the Board of Directors.	Terpenuhi Fulfilled
C. Fungsi dan Peran Dewan Komisaris **Functions and Roles of the Board of Commissioners**	
5. Memperkuat Keanggotaan dan Komposisi Direksi. Strengthening Membership and Composition of the Board of Directors.	
5.1 Penentuan jumlah anggota Direksi mempertimbangkan kondisi Perseroan serta efektivitas dalam pengambilan keputusan. Determination of the number of members of the Board of Directors by considering the Company's condition and effectiveness in decision making	Terpenuhi Fulfilled
5.2 Penentuan komposisi anggota Direksi memperhatikan, keberagaman keahlian, pengetahuan, dan pengalaman yang dibutuhkan. Determination of composition of members of the Board of Directors by considering the diversity of skills, knowledge and experience required.	Terpenuhi Fulfilled
5.3 Anggota Direksi yang membawahi bidang Akuntansi atau Keuangan memiliki keahlian dan/atau pengetahuan di bidang Akuntansi. Members of the Board of Directors in charge of accounting or finance possess expertise and/or knowledge in accounting	Terpenuhi Fulfilled
6 Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi Improving Quality of Duties and Responsibilities of the Board of Directors.	
6.1 Direksi mempunyai kebijakan penilaian sendiri (self-assessment) untuk menilai kinerja Direksi. The Board of Directors has issued a selfassessment policy to assess the Board of Directors' performance.	Terpenuhi Fulfilled
6.2 Kebijakan penilaian sendiri (self-assessment) menilai kinerja Direksi diungkapkan melalui Laporan Tahunan Perseroan. Selfassessment policy assessing the Board of Directors' performance is disclosed in the Company's Annual Report.	Terpenuhi Fulfilled
6.3 Direksi mempunyai kebijakan terkait pengunduran diri anggota Direksi apabila terlibat dalam kejahatan keuangan. The Board of Directors has issued a policy concerning the resignation of members of the Board of Directors in the event that they are involved in financial crimes.	Terpenuhi Fulfilled
D Partisipasi Pemangku Kepentingan **Stakeholders' Participation**	
7 Meningkatkan aspek Tata Kelola Perusahaan melalui Partisipasi Pemangku Kepentingan. Improving aspects of Corporate Governance through Stakeholders' Participation.	
7.1 Perseroan memiliki kebijakan untuk mencegah terjadinya insider trading. The Company has issued a policy to prevent insider trading.	Terpenuhi Fulfilled
7.2 Perseroan memiliki kebijakan anti korupsi dan *antifraud.* The company has issued anticorruption and antifraud policies.	Terpenuhi Fulfilled
7.3 Perseroan memiliki kebijakan tentang seleksi dan peningkatan kemampuan pemasok atau vendor. The Company has issued a policy concerning the selection and capacity building of suppliers or vendors.	Terpenuhi Fulfilled

Rekomendasi Recomendation			Keterangan Descriptions
	7.4	Perseroan memiliki kebijakan tentang pemenuhan hak-hak kreditur. The company has issued a policy concerning the fulfillment of the rights of creditors.	Terpenuhi Fulfilled
	7.5	Perseroan memiliki kebijakan sistem *whistleblowing*. The Company has issued a whistleblowing system policy.	Terpenuhi Fulfilled
	7.6	Perseroan memiliki kebijakan pemberian insentif jangka panjang kepada Direksi dan karyawan. The Company has issued a policy in regard to providing longterm incentives to Directors and employees.	Terpenuhi Fulfilled
E	Keterbukaan Informasi Information Disclosure		
	8	Meningkatkan Kualitas Pelaksanaan Tugas dan Tanggung Jawab Direksi. Improving Quality of Duties and Responsibilities of the Board of Directors.	
	8.1	Perseroan memanfaatkan penggunaan teknologi informasi secara lebih luas selain situs Web sebagai media keterbukaan informasi. The Company has benefited from the use of information technology more broadly in addition to the website as a medium for information disclosure.	Terpenuhi Fulfilled
	8.2	Laporan Tahunan Perseroan mengungkapkan pemilik manfaat akhir dalam kepemilikan saham Perusahaan Terbuka paling sedikit 5% (lima persen), selain pengungkapan pemilik manfaat akhir dalam kepemilikan saham Perseroan melalui pemegang saham utama dan pengendali. The Company's Annual Report discloses ultimate beneficial owner in the ownership of the Public Company's shares of at least 5% (five percent), in addition to disclosing the ultimate beneficial owner in the ownership of the Company's shares through the main and controlling shareholders.	Terpenuhi Fulfilled

Hasil *Assessment* Pelaksanaan Tata Kelola Tahun 2025

Assessment of Governance Implementation in 2025

Sebagai bentuk pemenuhan kewajiban sesuai dengan POJK Nomor 17 Tahun 2023 serta SEOJK Nomor 13/SEOJK.03/2017 tentang Penerapan Tata Kelola bagi Bank Umum, Perseroan telah melaksanakan penilaian mandiri (*self-assessment*) atas penerapan tata kelola sepanjang tahun 2025.

Berdasarkan hasil penilaian tersebut, penerapan Tata Kelola PT Bank Neo Commerce Tbk menunjukkan capaian sebagai berikut:

1. Semester I Tahun 2025 memperoleh peringkat "3" atau Cukup Baik, yang mencerminkan bahwa Perseroan telah menerapkan prinsip tata kelola secara memadai. Meskipun masih terdapat kelemahan dalam implementasi beberapa prinsip, hal tersebut dinilai cukup signifikan dan memerlukan perhatian serta tindak lanjut berkelanjutan dari manajemen.
2. Semester II Tahun 2025 memperoleh peringkat "2" atau Baik, hal ini mencerminkan dari pemenuhan yang memadai atas prinsip tata kelola. Dalam hal terdapat kelemahan penerapan prinsip tata kelola, secara umum kelemahan tersebut kurang signifikan dan dapat diselesaikan dengan tindakan normal oleh manajemen Bank.

As a form of compliance with POJK No. 17 of 2023 and SEOJK No. 13/SEOJK.03/2017 regarding the Implementation of Corporate Governance for Commercial Banks, the Company has conducted a self-assessment of its corporate governance practices in 2025.

Based on the results of this assessment, the achiements of corporate governance implementation at PT Bank Neo Commerce Tbk are as follows:

1. 1st semester of 2025, the Company received a rating of "3" or Fairly Good, reflecting that the Company has adequately applied corporate governance principles. Although there are still weaknesses in the implementation of certain principles, these weaknesses are considered significant and require continuous attention and follow-up from management.
2. 2nd Semester of 2025, the Company received a rating of "2" or Good, reflecting adequate compliance with corporate governance principles. In cases where there are weaknesses in the application of corporate governance principles, these weaknesses are generally insignificant and can be resolved through standard management actions.



Tanggung Jawab Sosial dan Lingkungan

Social and Environmental Responsibilities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Prinsip Dasar dan Komitmen
Core Principles and Commitments



Perseroan meyakini bahwa keberhasilan jangka panjang tidak semata-mata diukur dari capaian kinerja keuangan, melainkan juga dari sejauh mana Perseroan memberikan kontribusi nyata terhadap pembangunan berkelanjutan serta menjalankan tanggung jawabnya kepada lingkungan dan masyarakat. Pandangan ini selaras dengan ketentuan Pasal 1 Undang-undang No. 40 Tahun 2007 tentang Perseroan Terbatas, yang mendefinisikan Tanggung Jawab Sosial dan Lingkungan (TJSL) sebagai komitmen perusahaan untuk berpartisipasi dalam pembangunan ekonomi berkelanjutan guna meningkatkan kualitas kehidupan dan lingkungan yang bermanfaat bagi seluruh pemangku kepentingan. Lebih lanjut, Pasal 2 Peraturan Pemerintah No. 47 Tahun 2012 menegaskan bahwa setiap Perseroan Terbatas sebagai badan hukum memiliki kewajiban untuk melaksanakan TJSL.

The Company believes that long-term success is not measured solely by financial performance, but also by the extent to which the Company makes a tangible contribution to sustainable development and fulfills its responsibilities toward the environment and society. This perspective aligns with the provisions of Article 1 of Law No. 40 of 2007 on Limited Liability Companies, which defines Corporate Social and Environmental Responsibility (TJSL) as the Company's commitment to participate in sustainable economic development to improve the quality of life and the environment for the benefit of all stakeholders.zFurthermore, Article 2 of Government Regulation No. 47 of 2012 stipulates that every Limited Liability Company, as a legal entity, has an obligation to implement CSR.

Sebagai perusahaan terbuka yang beroperasi di sektor perbankan dengan layanan digital, Perseroan secara konsisten mengimplementasikan tanggung jawab tersebut dengan mengintegrasikannya ke dalam strategi dan proses bisnis. Pendekatan ini mencerminkan komitmen Perseroan untuk memastikan bahwa pertumbuhan usaha berjalan seiring dengan kepatuhan terhadap prinsip keberlanjutan.

As a publicly listed company operating in the banking with digital services sector, the Company consistently implements this responsibility by integrating it into its strategies and business processes. This approach reflects the Company's commitment to ensuring that its business growth is in line with its compliance with sustainability principles.

Pelaksanaan program TJSL merupakan wujud penerapan prinsip tata kelola perusahaan yang baik (*Good Corporate Governance/GCG*) sekaligus cerminan kepedulian Perseroan terhadap aspek sosial dan lingkungan. Bagi Perseroan, TJSL tidak hanya dimaknai sebagai pemenuhan kewajiban regulasi, tetapi juga sebagai sarana untuk menciptakan nilai tambah yang berkelanjutan bagi para pemangku kepentingan, termasuk karyawan, nasabah, mitra usaha, dan masyarakat luas.

The implementation of CSR programs is a form of the application of the Good Corporate Governance (GCG) principles and demonstrates the Company's concern for social and environmental aspects. For the Company, TJSL is not merely seen as fulfilling regulatory obligations, but also as a way to create sustainable value for stakeholders, including employees, customers, business partners, and the broader community.

Perencanaan dan pelaksanaan TJSL dirancang untuk menjaga keseimbangan antara dimensi ekonomi, sosial, dan lingkungan dengan mengedepankan prinsip keberlanjutan. Setiap inisiatif TJSL dilaksanakan melalui kebijakan dan program yang mempertimbangkan secara menyeluruh aspek lingkungan hidup, ketenagakerjaan, sosial kemasyarakatan, serta perlindungan dan kepentingan nasabah.

The planning and implementation of TJSL are designed to maintain a balance between economic, social, and environmental dimensions by prioritizing sustainability principles. Every TJSL initiative is implemented through policies and programs that comprehensively consider environmental, labor, social, and community aspects, as well as customer protection and interests.

Selain itu, Perseroan berkomitmen untuk berkontribusi dalam pencapaian Tujuan Pembangunan Berkelanjutan (*Sustainable Development Goals/SDGs*) melalui program TJSL yang memberikan dampak nyata dan berkelanjutan. Dengan demikian, Perseroan tidak hanya berorientasi pada pencapaian kinerja bisnis yang optimal, tetapi juga pada penguatan ekosistem usaha yang bertanggung jawab dan memiliki perspektif jangka panjang.

Furthermore, the Company is committed to contributing to the achievement of the Sustainable Development Goals (SDGs) through TJSL programs that deliver tangible and sustainable impacts. Thus, the Company is not only focused on achieving optimal business performance but also on strengthening a responsible business ecosystem with a long-term perspective.

Dalam setiap aktivitas operasionalnya, Perseroan memandang kontribusi positif bagi masyarakat dan lingkungan sebagai tanggung jawab moral sekaligus bagian yang tidak terpisahkan dari praktik bisnis yang beretika dan berkelanjutan.

In all its operational activities, the Company considers positive contributions to society and the environment as a moral responsibility and an integral part of ethical and sustainable business practices.

Pernyataan bahwa Ulasan Lengkap Mengenai Kegiatan TJSL Diungkapkan pada Laporan Keberlanjutan

Statement that a Comprehensive Review of TJSL Activities is Disclosed in the Sustainability Report

Perseroan senantiasa menjalankan seluruh aktivitas usahanya dengan mengedepankan kepatuhan terhadap peraturan perundang-undangan serta ketentuan yang berlaku. Komitmen ini menjadi landasan dalam memastikan bahwa setiap kegiatan operasional dilakukan secara bertanggung jawab dan berintegritas.

The Company consistently conducts all its business activities by prioritizing compliance with applicable laws, regulations, and provisions. This commitment serves as a foundation that ensures all operational activities are carried out responsibly and with integrity.



Sebagai lembaga jasa keuangan, Perseroan menerapkan prinsip-prinsip keuangan berkelanjutan yang sejalan dengan Peraturan Otoritas Jasa Keuangan (POJK) Nomor 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik. Penerapan tersebut sekaligus merupakan bentuk pemenuhan terhadap ketentuan dalam Surat Edaran Otoritas Jasa Keuangan (SEOJK) No. 16/SEOJK.04/2021 mengenai Bentuk dan Isi Laporan Tahunan Emiten atau Perusahaan Publik.

As a financial services institution, the Company applies sustainable finance principles in line with Financial Services Authority (OJK) Regulation No. 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies. This implementation also constitutes compliance with the provisions of the Financial Services Authority Circular (SEOJK) No. 16/SEOJK.04/2021 regarding the Form and Content of Annual Reports of Issuers or Public Companies.



Informasi yang komprehensif mengenai program serta pelaksanaan kegiatan Tanggung Jawab Sosial dan Lingkungan (TJSL) Perseroan sepanjang tahun 2025 disajikan dalam Laporan Keberlanjutan 2025. Laporan ini merupakan bagian yang tidak terpisahkan dari Laporan Tahunan Perseroan.

Sebagai bentuk komitmen terhadap prinsip transparansi dan akuntabilitas kepada seluruh pemangku kepentingan, Laporan Tahunan dan Laporan Keberlanjutan Tahun 2025 juga telah tersedia dan dapat diakses melalui situs web resmi Perseroan.

Comprehensive information regarding the Company's Social and Environmental Responsibility (TJSL) programs and activities throughout 2025 is presented in the 2025 Sustainability Report, which is an integral part of the Company's Annual Report.

As a demonstration of our commitment to the principles of transparency and accountability to all stakeholders, the 2025 Annual Report and Sustainability Report are also available and accessible via the Company's official website.

Laporan Keberlanjutan

Sustainability Report





Prinsip Dasar dan Komitmen

Basic Principles and Commitments



Laporan Keberlanjutan Tahun 2025 merupakan laporan keberlanjutan keempat yang diterbitkan oleh Perseroan. Penyusunan laporan ini dilaksanakan dengan mengacu pada Peraturan Otoritas Jasa Keuangan Nomor 51/POJK.03/2017 beserta Lampiran II tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik, serta Surat Edaran Otoritas Jasa Keuangan Nomor 16/SEOJK.04/2021 mengenai bentuk dan isi Laporan Tahunan Emiten atau Perusahaan Publik.

Penerbitan laporan ini merupakan wujud komitmen Perseroan dalam menerapkan prinsip keuangan berkelanjutan secara konsisten dan terintegrasi pada seluruh kegiatan usaha, sesuai dengan delapan (8) Prinsip Keuangan Berkelanjutan. Melalui laporan ini, Perseroan menyampaikan implementasi kebijakan, program, dan kegiatan keberlanjutan yang telah direncanakan dan dilaksanakan sebagaimana tercantum dalam Rencana Aksi Keuangan Berkelanjutan (RAKB) dalam rangka mendukung pembangunan ekonomi berkelanjutan.

This 2025 Sustainability Report is the fourth sustainability report published by the Company. This report was prepared in accordance with Financial Services Authority Regulation No. 51/POJK.03/2017 and Appendix II regarding the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies, as well as Financial Services Authority Circular Letter No. 16/SEOJK. 04/2021 regarding the form and content of the Annual Report of Issuers or Public Companies.

The publication of this report reflects the Company's commitment to consistently and integratedly implementing sustainable finance principles across all business activities, as stipulated in the eight (8) Principles of Sustainable Finance. Through this report, the Company presents the implementation of sustainability policies, programs, and activities that have been planned and carried out as outlined in the Sustainable Finance Action Plan (RAKB) to support sustainable economic development.

Laporan Keberlanjutan ini memuat informasi kinerja keberlanjutan Perseroan pada aspek ekonomi, sosial, lingkungan hidup, dan tata kelola untuk periode pelaporan 1 Januari 2025 sampai dengan 31 Desember 2025. Laporan ini disusun dan diterbitkan secara tahunan serta disajikan bersamaan dengan Laporan Tahunan dalam satu buku yang sama, sebagai kelanjutan dari laporan periode sebelumnya yang diterbitkan pada April 2025. Penerapan pelaporan terintegrasi bertujuan untuk memastikan keterkaitan dan konsistensi pengungkapan informasi antar laporan, serta menghindari duplikasi data dan informasi.

Seluruh informasi yang disajikan dalam laporan ini telah melalui proses penelaahan internal oleh manajemen dan unit kerja terkait, serta memperoleh persetujuan dari manajemen puncak Perseroan. Oleh karena itu, Perseroan menyatakan bahwa informasi yang diungkapkan dalam laporan ini telah disusun secara wajar dan dapat dipertanggungjawabkan.

Cakupan pelaporan keberlanjutan dalam laporan ini meliputi kegiatan operasional Kantor Pusat PT Bank Neo Commerce Tbk dan Kantor Cabang Utama Perseroan. Dalam rangka peningkatan kualitas pelaporan dan penerapan prinsip transparansi, Perseroan menyediakan Lembar Umpan Balik pada bagian akhir laporan sebagai sarana bagi pemangku kepentingan untuk menyampaikan saran dan masukan.

This Sustainability Report contains information on the Company's sustainability performance across economic, social, environmental, and governance aspects for the reporting period from January 1, 2025, to December 31, 2025. This report is prepared and published annually and presented together with the Annual Report in the same book, as a continuation of the previous period's report published in April 2025. The adoption of integrated reporting aims to ensure the relevance and consistency of information disclosure between the reports, as well as to avoid duplication of data and information.

All information presented in this report has been reviewed internally by management and relevant departments, and has been approved by the Company's senior management. Therefore, the Company declares that the information disclosed in this report has been prepared fairly and is accountable.

The scope of sustainability reporting in this report covers the operational activities of the Head Office of PT Bank Neo Commerce Tbk and the Company's Main Branch. In order to improve reporting quality and uphold the principle of transparency, the Company provides a Feedback Sheet at the end of the report to enable stakeholders to submit suggestions and feedback.

Corporate Secretary

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Strategi Keberlanjutan

Sustainability Strategy

Perseroan meyakini bahwa keberlanjutan jangka panjang merupakan prasyarat utama bagi pertumbuhan usaha yang berkesinambungan. Dalam menghadapi dinamika industri perbankan yang semakin kompleks dan kompetitif, Perseroan senantiasa berupaya menjaga keseimbangan antara pencapaian kinerja ekonomi, pemberian kontribusi sosial, serta pemenuhan tanggung jawab terhadap lingkungan hidup. Pemahaman tersebut mendorong Perseroan untuk berperan aktif dalam upaya mitigasi risiko perubahan iklim sebagai bagian dari kontribusi terhadap pembangunan ekonomi berkelanjutan.

The Company believes that long-term sustainability is an essential element for sustainable business growth. Amidst the increasingly complex and competitive dynamics of the banking industry, the Company consistently strives to maintain a balance between achieving economic performance, making social contributions, and fulfilling its environmental responsibilities. This understanding drives the Company to actively contribute to climate change risk mitigation efforts as part of its commitment to sustainable economic development.

Dalam rangka memastikan keberlanjutan usaha, Perseroan memfokuskan strategi pada penguatan fondasi bisnis yang selaras dengan prinsip *triple bottom line*, yang mencakup perhatian terhadap aspek sosial (*people*), penciptaan nilai ekonomi (*profit*), serta perlindungan dan pelestarian lingkungan hidup (*planet*). Ketiga aspek tersebut dipandang sebagai satu kesatuan yang terintegrasi dan menjadi dasar dalam setiap aktivitas operasional dan pengambilan keputusan bisnis Perseroan.

To ensure business sustainability, the Company's strategy focuses on strengthening its business foundation in line with the triple bottom line principle, which encompasses attention to social aspects (people), the creation of economic value (profit), and the protection and preservation of the environment (planet). These three aspects are regarded as an integrated unit and become the foundation for all of the Company's operational activities and business decision-making.

Sebagai bentuk implementasi, Perseroan telah menetapkan strategi keberlanjutan sesuai dengan ketentuan POJK No. 51/POJK.03/2017 dan menyelaraskannya dengan Roadmap Keuangan Berkelanjutan Tahap II (2021–2025) yang menitikberatkan pada pengembangan ekosistem keuangan berkelanjutan secara komprehensif. Prioritas strategis serta target keberlanjutan Perseroan selanjutnya dirumuskan dalam Rencana Aksi Keuangan Berkelanjutan (RAKB) Tahun 2025 sebagai pedoman pelaksanaan bagi seluruh unit kerja dan lini organisasi.

As part of its implementation, the Company has established a sustainability strategy in accordance with POJK No. 51/POJK.03/2017 and aligned it with the Sustainable Finance Roadmap Phase II (2021–2025), which emphasizes the comprehensive development of a sustainable financial ecosystem. The Company's strategic priorities and sustainability targets are further formulated in the 2025 Sustainable Finance Action Plan (RAKB) as an implementation guideline for all work units and organizational levels.

Hingga periode pelaporan, Perseroan secara konsisten menerapkan budaya kerja green office lifestyle serta melaksanakan Program Tanggung Jawab Sosial dan Lingkungan (TJSL) yang diselaraskan dengan Tujuan Pembangunan Berkelanjutan (Sustainable Development Goals/SDGs). Dari sisi produk dan layanan, Perseroan terus mendorong peningkatan penyaluran pembiayaan dan kredit kepada kegiatan usaha berkelanjutan, sejalan dengan target yang telah ditetapkan dalam RAKB Tahun 2025.

As of the reporting period, the Company has consistently implemented a green office lifestyle work culture and carried out the Social and Environmental Responsibility Program (TJSL) in line with the Sustainable Development Goals (SDGs). In terms of products and services, the Company continues to promote the increase in the disbursement of financing and credit for sustainable business activities, in line with the targets set in the 2025 RAKB.

Sebagai bank berbasis layanan digital, Perseroan menyediakan akses terhadap seluruh produk dan layanan perbankan secara daring tanpa memerlukan kunjungan fisik ke kantor cabang. Model operasional ini tidak hanya meningkatkan efisiensi dan kenyamanan bagi nasabah, tetapi juga mendukung upaya pengurangan emisi karbon serta sejalan dengan prinsip green banking yang dicanangkan oleh Pemerintah.

Melalui implementasi strategi, program, dan inisiatif keberlanjutan tersebut, Perseroan meyakini bahwa perannya sebagai agen perubahan dan mitra strategis Pemerintah dapat memberikan kontribusi nyata dalam mendorong terwujudnya ekonomi hijau yang inklusif dan berkelanjutan di Indonesia.

As a digital-based bank, the Company provides access to all banking products and services online without requiring physical visits to branch offices. This operational model not only enhances efficiency and convenience for customers but also supports efforts to reduce carbon emissions and aligns with the green banking principles advocated by the Government.

Through the implementation of these sustainability strategies, programs, and initiatives, the Company believes that its role as an agent of change and a strategic partner of the Government can make a tangible contribution in promoting an inclusive and sustainable green economy in Indonesia.

Dukungan Nyata Bank Neo Commerce terhadap Agenda Pembangunan Berkelanjutan

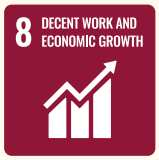
Strategi keberlanjutan yang diterapkan oleh Perseroan dirancang tidak hanya untuk menciptakan nilai ekonomi bagi Perusahaan, tetapi juga untuk memberikan manfaat yang lebih luas bagi para pemangku kepentingan. Melalui pendekatan tersebut, Perseroan berupaya memastikan bahwa setiap inisiatif yang dijalankan turut berkontribusi dalam mendukung pencapaian 17 Tujuan Pembangunan Berkelanjutan (*Sustainable Development Goals*/ SDGs).

Berbagai program dan inisiatif keberlanjutan Perseroan telah diselaraskan dengan agenda pembangunan nasional yang dicanangkan Pemerintah, sehingga kehadiran Bank Neo Commerce diharapkan dapat memberikan dampak positif yang nyata dan berkelanjutan bagi masyarakat serta lingkungan. Keterkaitan antara inisiatif Perseroan dan sasaran SDGs tersebut disajikan dalam bagan berikut.

Bank Neo Commerce's Tangible Support for the Sustainable Development Agenda

The sustainability strategies implemented by the Company are designed not only to create economic value for the Company but also to provide broader benefits for stakeholders. Through this approach, the Company strives to ensure that every initiative contributed to supporting the achievement of the 17 Sustainable Development Goals (SDGs).

Various sustainability programs and initiatives of the Company have been aligned with the national development agenda set forth by the Government, and it is hoped that the presence of Bank Neo Commerce will have a tangible and sustainable positive impact on society and the environment. The connection between the Company's initiatives and the SDG targets is presented in the following chart.

Tujuan SDGs SDGs Goals	Target Targets	Program / Kegiatan Perusahaan dalam laporan ini Corporate Program/Activity in this Report
	Mengakhiri kemiskinan dimanapun dan dalam semua bentuk End poverty everywhere and in all forms	• Penyediaan produk produk perbankan yang solutif bagi nasabah • Memberikan edukasi literasi keuangan kepada nasabah dan masyarakat • Membuka akses terhadap layanan keuangan melalui produk dan jasa perbankan yang dipasarkan • Providing solution-oriented banking products for customers • Providing financial literacy education to customers and the public • Opening access to financial services through marketed banking products and services
	Memberikan hak atas kesehatan dan kehidupan yang sehat dan sejahtera Ensure healthy lives and promote wellbeing for all at all ages	• Memberikan fasilitas asuransi kesehatan bagi karyawan • Menciptakan lingkungan kerja yang sehat dan aman • Providing health insurance facilities for employees • Creating a healthy and safe work environment
	Mencapai kesetaraan *gender* dan memberdayakan semua perempuan dan anak perempuan Achieve gender equality and empower all women and girls	• Membuka lapangan kerja seluas-luasnya tanpa membeda-bedakan gender sepanjang kandidat yang bersangkutan mampu memenuhi kualifikasi yang dipersyaratkan • Mendukung program pengembangan karier karyawan • Menjamin pemenuhan hak-hak karyawan, termasuk hak bagi karyawan perempuan • Kegiatan CSR bagi karyawan. • Opening job opportunities as wide as possible without discriminating against gender as long as the candidate concerned is able to meet the required qualifications • Supporting employee career development programs • Ensuring the fulfillment of employee rights, including the rights of female employees • CSR activities for employees.
	Mendukung pertumbuhan ekonomi yang inklusif dan berkelanjutan, tenaga kerja penuh dan produktif dan pekerjaan yang layak bagi semua Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.	• Kinerja ekonomi yang positif dan berkelanjutan • Penciptaan lapangan kerja • Kegiatan CSR bagi masyarakat • Mengentaskan kerja paksa • Melindungi hak hak karyawan. • Positive and sustainable economic • Job creation • CSR activities for the community • Ending forced labour • Protecting employee rights.
	Memperbesar pemanfaatan jasa keuangan bagi pekerja dan masyarakat Strengthen the use of financial services for workers and the community,	• Kegiatan edukasi dan inklusi keuangan yang dilaksanakan oleh Bank • Membuka akses pemanfaatan produk yang dimiliki Bank sesuai dengan kemampuan dan kebutuhan masyarakat. • Financial education and inclusion activities • implemented by the Bank • Opening access to optimize products owned by the Bank in accordance with the capabilities and needs of the community.

Tujuan SDGs SDGs Goals	Target Targets	Program / Kegiatan Perusahaan dalam laporan ini Corporate Program/Activity in this Report
	Pencapaian usaha berkelanjutan dalam menjalankan praktek usaha. Achievement of sustainable business in running business practices.	• Mendukung pengelolaan sampah di lingkungan Bank • Mengurangi penggunaan kertas dalam menjalankan operasional Perseroan secara internal maupun dengan konsumen • Efisiensi pemanfaatan energi listrik dan air dalam menjalankan kegiatan usaha. • Supporting waste management within the Bank • Reducing the use of paper in carrying out the Company's operations internally and with consumers • Efficient use of electricity and water in carrying out business activities.

Pelaksanaan Rencana Aksi Keuangan Berkelanjutan (RAKB)

Dalam rangka mengimplementasikan strategi Keuangan Berkelanjutan, Perseroan menyusun dan melaksanakan Rencana Aksi Keuangan Berkelanjutan (RAKB) untuk periode 2025-2029. RAKB tersebut memuat rencana aksi jangka pendek dengan cakupan periode satu tahun serta rencana aksi jangka menengah hingga jangka panjang untuk periode sampai dengan lima tahun. Penyusunan dan pelaksanaan RAKB dilakukan sebagai bentuk pemenuhan kewajiban Perseroan atas ketentuan Peraturan Otoritas Jasa Keuangan Nomor 51/POJK.03/2017 mengenai Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik.

Unit kerja yang ditetapkan sebagai penanggung jawab pelaksanaan RAKB secara berkala melakukan pemantauan dan evaluasi terhadap kebijakan, program, serta proses keberlanjutan yang diimplementasikan dalam kegiatan operasional Perseroan. Kegiatan evaluasi tersebut bertujuan untuk memastikan bahwa strategi dan inisiatif keberlanjutan yang dijalankan tetap selaras dengan ketentuan peraturan perundang-undangan, relevan dengan dinamika usaha, efektif dalam pelaksanaannya, serta mampu memberikan kontribusi terhadap pertumbuhan ekonomi dan sosial di wilayah operasional Perseroan.

Aktualisasi RAKB Tahun 2025

Mengacu pada ketentuan POJK 51/2017, sepanjang tahun 2025 Perseroan telah melaksanakan berbagai program yang tercantum dalam RAKB. Program-program tersebut dirancang dengan mempertimbangkan keselarasan antara target pencapaian SDGs, sasaran bisnis Perseroan, serta pemenuhan regulasi yang ditetapkan oleh Pemerintah Indonesia.

Implementation of the Sustainable Finance Action Plan (RAKB)

In order to implement its Sustainable Finance strategy, the Company has formulated and implemented the Sustainable Finance Action Plan (RAKB) for the 2025-2029 period. The RAKB includes short-term action plans covering a one-year period, as well as medium- to long-term action plans covering a period of up to five years. The formulation and implementation of the RAKB aim to fulfill the Company's obligations under Financial Services Authority Regulation No. 51/POJK.03/2017 regarding the Application of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies.

The work unit designated as responsible for implementing the RAKB periodically monitors and evaluates the sustainability policies, programs, and processes implemented in the Company's operational activities. These evaluations aim to ensure that the sustainability strategies and initiatives being carried out remain in line with laws and regulations, relevant to business dynamics, effective in their implementation, and capable of contributing to economic and social growth in the Company's operational regions.

Implementation of the RAKB 2025

In accordance with POJK 51/2017, the Company has implemented various programs outlined in the RAKB throughout 2025. These programs were designed by focusing on aligning SDG targets, the Company's business objectives, and compliance with regulations established by the Government of Indonesia.

Sebagai bentuk transparansi, berikut disajikan ringkasan program dan inisiatif keberlanjutan yang telah ditetapkan dalam RAKB Tahun 2025, yang menjadi pedoman pelaksanaan Keuangan Berkelanjutan di seluruh lini organisasi Perseroan.

As a form of transparency, the following is a summary of the sustainability programs and initiatives established in the RAKB 2025, which serves as a guideline for the implementation of Sustainable Finance across all levels of the Company's organization.

Uraian Aktivitas **Activity Description**	**Tujuan Aktivitas** **Activity Goal**	**Indikator Keberhasilan** **Achievement Indicator**	**Status Implementasi** **Implementation Status**
Januari–Maret January-March			
Melakukan finalisasi dan mempersiapkan program marketing dan kampanye untuk dengan Mitra terpilih untuk peluncuran produk Neo Green Finalizing and preparing marketing and campaign programs with selected partners for the launching of Neo Green product	Mempersiapkan proses penerbitan produk NeoGreen Preparing the launching process of Neo Green Product	*Launching* Produk baru Simpanan, dimana dengan menabung nasabah dapat ikut serta dalam menjaga kelestarian lingkungan hidup: Tabungan Neo Green Launching a new Savings product, in which customers can participate in preserving the environment through their savings : Neo Green Savings	Bank dalam tahap persiapan untuk proses peluncuran produk Neo Green di Q2 2025, termasuk mempersiapkan program marketing yang akam diimplementasikan dengan mitra terpilih The Bank is currently preparing for the launch of the Neo Green product in Q2 2025, including preparing a marketing program to be implemented with selected partners
April–Juni April-June			
Melakukan sosialisasi dan kampanye peluncuran produk tabungan Neo Green dengan memanfaatkan platform digital Conducting socialization and campaign for the launch of the Neo Green savings product using digital platforms	Mendorong awareness nasabah dan/atau calon nasabah akan produk tabungan baru Neo Green Raising awareness among customers and/or prospective customers about the new Neo Green savings product	Launching produk tabungan Neo Green dan semakin banyak nasabah/ calon nasabah yang mengetahui mengenai produk tabungan Neo Green Launching of Neo Green savings product and an increasing number of customers and prospective customers who are aware of Neo Green savings product	Bank meluncurkan produk Tabungan baru bernama Neo Green pada tanggal 26 Juni 2025, dimana nasabah dapat memberikan kontribusi pada kelestarian lingkungan hidup dengan melakukan pembukaan Tabungan Neo Green The Bank launched a new savings product called Neo Green on June 26, 2025, allowing customers to contribute to environmental conservation by opening a Neo Green savings account

Uraian Aktivitas Activity Description	Tujuan Aktivitas Activity Goal	Indikator Keberhasilan Achievement Indicator	Status Implementasi Implementation Status
Juli–September July-September			
Terus Melakukan sosialisasi dan kampanye produk tabungan Neo Green dengan memanfaatkan platform digital; serta melakukan kolaborasi dengan Mitra Terpilih Continue socializing and promoting the Neo Green savings product by leveraging digital platforms; and collaborate with Selected Partners Melakukan uji coba terbatas untuk produk Neo Business Loan dan melakukan pemasaran dengan memanfaatkan platform digital Bank Conducting a limited trial for the Neo Business Loan product and marketing it through the Bank's digital platforms	Meningkatkan awareness nasabah dan/atau calon nasabah akan produk tabungan Neo Green guna mendorong minat dan potensi akuisisi Raise awareness among customers and/or prospective customers about the Neo Green savings product to drive interest and potential customer acquisition Memperkenalkan produk Neo Business Loan kepada nasabah Bank eksisting produk Neo Business Introducing the Neo Business Loan product to existing Bank customers of the Neo Business product	Meningkatnya jumlah nasabah dan dana kelolaan yang memiliki produk tabungan Neo Green Increase in the number of customers and assets under management holding Neo Green savings product Bergabungnya nasabah eksisting produk Neo Business yang mengajukan produk Neo Business Loan Inclusion of existing Neo Business customers who apply for the Neo Business Loan	Pada periode 30 September 2025 Bank berhasil memiliki sebanyak 13.934 rekening Tabungan Neo Green As of September 30, 2025, the Bank had opened a total of 13,934 Neo Green Savings accounts Bank melakukan uji coba terbatass produk Neo Business Loan pada tanggal 23 Juli 2025. Per 30 September 2025, Bank telah memiliki sebanyak 74 rekening pinjaman Neo Business Loan The Bank conducted a limited trial of the Neo Business Loan product on July 23, 2025. As of September 30, 2025, the Bank had 74 Neo Business Loan accounts
Oktober–Desember October-December			
Melakukan kolaborasi dengan Partner untuk melakukan sosialisasi dan kampanye Produk Tabungan Neo Green, dengan melakukan berbagai program aktivasi yang melibatkan nasabah untuk terlibat langsung dalam kegiatan yang berhubungan dengan kelestarian lingkungan Collaborating with partners to socialize and promote the Neo Green Savings Product through various activation programs that encourage customers to participate directly in activities related to environmental sustainability	Mendorong peningkatan *awareness, engagement,* dan adopsi Produk Tabungan Neo Green serta mengajak nasabah untuk mengetahui implementasi porsi donasi dari produk Tabungan Neo Green yang dikelola oleh Partner Increase awareness, engagement, and adoption of the Neo Green Savings Product, and encourage customers to learn about how the donation portions from the Neo Green Savings Product are managed by our partners	Meningkatnya jumlah nasabah yang memiliki produk Tabungan Neo Green dan Terlaksananya program edukasi kelestarian lingkungan guna meningkatkan awareness dan pemahaman nasabah terhadap isu keberlanjutan Increase in the number of customers holding Neo Green Savings accounts and the implementation of environmental sustainability education programs to raise customer awareness and understanding of sustainability issues	Pada periode 31 Desember 2025 Bank memiliki 29.298 rekening Tabungan Neo Green, dengan total portofolio Rp3.758 miliar As of December 31, 2025, the Bank had 29,298 Neo Green Savings accounts, with a total portfolio of IDR 3.758 billion

Uraian Aktivitas Activity Description	Tujuan Aktivitas Activity Goal	Indikator Keberhasilan Achievement Indicator	Status Implementasi Implementation Status
Pemantauan portofolio Neo Business Loan yang disalurkan pada periode Uji Coba Terbatas yang akan dituangkan dalam laporan terkait Hasil uji coba terbatas untuk produk Neo Business Loan. Selanjutnya Bank akan mempersiapkan laporan tersebut sebagai bagian pemenuhan dokumen untuk pengajuan perizinan produk Neo Business Loan agar dapat secara resmi meluncurkan produk tersebut melalui platform digital bank Monitoring of the Neo Business Loan portfolio disbursed during the Limited Trial Period will be detailed in a report on the results of the Neo Business Loan Limited Trial. The Bank will then prepare this report as part of the documentation required for the Neo Business Loan product licensing application, enabling the product to be officially launched through the Bank's digital platform	Melakukan evaluasi atas produk untuk proses perizinan produk terkait sebelum peluncuran produk Neo Business Loan secara resmi melalui platform digital bank Conducting a product evaluation for the relevant product licensing process prior to the official launch of the Neo Business Loan through the Bank's digital platform	Penyusunan Laporan Hasil Uji Coba Neo Business Loan yang telah dilakukan menjelang Juli – September 2025 Preparation of Neo Business Loan Trial Report which was implemented before July - September 2025	Bank menyelesaikan uji coba terbatas produk Neo Business Loan pada tanggal 30 September 2025. Per tanggal 31 Desember 2025, Bank memiliki sebanyak 24 rekening pinjaman Neo Business Loan The Bank completed a limited trial of its Neo Business Loan product on September 30, 2025. As of December 31, 2025, the Bank had 24 Neo Business Loan accounts

Penanggung Jawab RAKB

Pelaksanaan seluruh program dan inisiatif yang tercantum dalam RAKB berada di bawah tanggung jawab Tim Task Force RAKB. Tim ini dibentuk berdasarkan Surat Keputusan Direksi No. SKEP/133/SET/BNC/X/2025 tanggal 31 Oktober 2025 tentang Pembaharuan Tim Task Force Penyusunan Rencana Aksi Keuangan Berkelanjutan (RAKB) PT Bank Neo Commerce Tbk.

Tim Task Force tersebut bertanggung jawab langsung kepada Direksi dan dipimpin oleh pejabat setingkat Pimpinan Unit Kerja yang melapor kepada Direktur Utama. Struktur organisasi ini dirancang untuk memastikan bahwa penerapan Keuangan Berkelanjutan dapat dijalankan secara terkoordinasi, konsisten, dan menyeluruh di seluruh kegiatan operasional Perseroan. Dengan dukungan tata kelola yang jelas, Keuangan Berkelanjutan telah menjadi bagian integral dan berkelanjutan dalam sistem manajemen Perseroan.

Person in Charge of the RAKB

The implementation of all programs and initiatives listed in the RAKB falls under the responsibility of the RAKB Task Force. This team was established pursuant to Board of Directors' Decree No. SKEP/133/SET/BNC/X/2025 dated October 31, 2025, regarding the Renewal of the Task Force for the Development of the Sustainable Finance Action Plan (RAKB) of PT Bank Neo Commerce Tbk.

The Task Force reports directly to the Board of Directors and is led by the Head of Work Unit who reports to the President Director. This organizational structure is designed to ensure that the implementation of Sustainable Finance can be carried out in a coordinated, consistent, and comprehensive manner across all of the Company's operational activities. With the support of clear governance, Sustainable Finance has become an integral and ongoing part of the Company's management system.

Target dan Realisasi RAKB Tahun 2025

Sebagai bentuk akuntabilitas atas pelaksanaan Keuangan Berkelanjutan, Perseroan menyampaikan capaian realisasi RAKB sepanjang tahun 2025. Informasi ini mencerminkan sejauh mana program dan inisiatif keberlanjutan telah dijalankan sesuai dengan target yang ditetapkan dalam RAKB.

Rincian target dan realisasi pelaksanaan aksi Keuangan Berkelanjutan selama tahun 2025 disajikan dalam tabel berikut.

RAKB 2025 Targets and Realization

As a form of accountability for the implementation of Sustainable Finance, the Company reports the realization of the RAKB throughout 2025. This information reflects the extent to which sustainability programs and initiatives have been implemented in accordance with the targets set in the RAKB.

Details of the targets and realization of Sustainable Finance actions during 2025 are presented in the following table.

Uraian/Tahun Description/Year	**2025**	
	Jumlah Total	**Nominal (Rp juta)** Nominal (IDR million)
Jumlah produk yang memenuhi kriteria kegiatan usaha berkelanjutan Number of products that meet the criteria for sustainable business activities		
a. Penghimpunan dana Fundrasing	-	-
b. Penyaluran dana Disbursement of Funds	24	160,5

Uraian/Tahun Description/Year	2025	
	Jumlah Total	Nominal (Rp juta) Nominal (IDR million)
Total aset produktif kegiatan usaha berkelanjutan Total Earning Assets of Sustainable Business Activities		
a. Total kredit kegiatan usaha berkelanjutan Total Loan/Financing of Sustainable Business Activities	-	-
b. Total non – kredit kegiatan usaha berkelanjutan terhadap total kredit Bank (%) Total Non-Loan/Financing Non-Sustainable Business Activities	8	340.485
Persentase total kredit kegiatan usaha berkelanjutan terhadap total kredit Bank (%) Percentage of total loan/financing of sustainable business activities to total bank loan/financing (%)	-	-
Jumlah dan kualitas kredit kegiatan usaha berkelanjutan The number and quality of loan for sustainable business activities		
a. Energi terbarukan Renewable energy	Nihil Nil	Nihil Nil
b. Efisiensi energi Energy efficiency	Nihil Nil	Nihil Nil
c. Energi terbarukan Renewable energy	Nihil Nil	Nihil Nil
d. Efisiensi energi Energy efficiency	Nihil Nil	Nihil Nil
e. Energi terbarukan Renewable energy	Nihil Nil	Nihil Nil
f. Efisiensi energi Energy efficiency	Nihil Nil	Nihil Nil
g. Energi terbarukan Renewable energy	Nihil Nil	Nihil Nil
h. Efisiensi energi Energy efficiency	Nihil Nil	Nihil Nil
i. Energi terbarukan Renewable energy	Nihil Nil	Nihil Nil
j. Efisiensi energi Energy efficiency	Nihil Nil	Nihil Nil
k. Energi terbarukan Renewable energy	Nihil Nil	Nihil Nil
l. Efisiensi energi Energy efficiency	Nihil Nil	Nihil Nil

Ikhtisar Aspek Keberlanjutan
Sustainability Aspect Highlights

Aspek Ekonomi
Economic Aspect

Keterangan Description	Satuan Unit	2025	2024	2023
Jenis produk yang memenuhi kriteria kegiatan usaha berkelanjutan (KKUB) Types of products that meet the criteria for sustainable business activities	Unit Produk Product Unit	Kredit untuk UMKM Credit for MSMEs	Kredit pengelolaan sumber daya alam hayati dan penggunaan lahan yang berkelanjutan Credit for sustainable management of biological resources and land use	• Kredit untuk UMKM • Kredit pengelolaan sumber daya alam hayati dan penggunaan lahan yang berkelanjutan • Credit for MSMEs • Credit for sustainable management of biological resources and land use
Nominal prosedur dan /atau jasa yang memenuhi kriteria kegiatan usaha berkelanjutan (KKUB) Number of products and/ or services that meet the criteria for sustainable business activities	Rp Juta IDR million	-	-	98.926
Penyaluran kredit keseluruhan Overall loan distribution	Rp Juta IDR million	7.182.580	8.822.146	10.695.340
Persentase total portofolio kegiatan usaha berkelanjutan terhadap total portofolio (%): Percentage of the total portfolio of sustainable business activities to the total portfolio (%):				
a. Penghimpunan Dana Fundraising	Persen Percent	Nihil Nil	Nihil Nil	Nihil Nil
b. Penyaluran Dana Disbursement of Funds	Persen Percent	0,002%	0,92%	0,92%

Aspek Lingkungan Hidup
Environmental Aspect

Keterangan Description	Satuan Unit	2025	2024	2023
Penggunaan BBM Fuel Usage	Liter Liters	24.976	25.474	21.329
Penggunaan Listrik Electricity Usage	Kwh Kwh	329.750	337.158	250.754
	Gigajoules Gigajoules	1.187	1.213	902
Penggunaan Air Water Usage	Meter kubik Cubic meters	1.667	1.789	n/a*
Biaya Lingkungan Hidup Environmental Costs	Rp Juta IDR million	n/a	n/a	n/a

Aspek Sosial
Social Aspect

Keterangan Description	Satuan Unit	2025	2024	2023
Jumlah total karyawan Total Number of Employees	Orang People	933	1.208	998
Jumlah karyawan tetap pria Total male employees	Orang People	290	364	326
Jumlah karyawan tetap wanita Total female employees	Orang People	226	262	253
Pengurus Bank dan Kepala Cabang berdasarkan jenis kelamin Bank Management and Branch Manager by gender	Pria (Orang) Male (People)	14	14	17
	Wanita (Orang) Female (People)	13	13	21
Jumlah karyawan berdasarkan wilayah Number of employees by region	Kantor Pusat Head Office	591	709	611
	Kantor di Daerah Regional Office	342	499	387
Biaya pengembangan kompetensi karyawan Employee Competence Development Cost	Rp Juta IDR Million	5.813	6.200	8.884
Rata-rata jam pelatihan karyawan wanita Average training hours for female employees	Jam per Tahun Hour per Year	34.63	26.531	39,13
Rata-Rata jam pelatihan karyawan pria Average training hours for male employees	Jam per Tahun Hour per Year	38.16	2,7.281	39,13
Jumlah penyeluran Dana Corporate Social Responsibility (CSR) Total Disbursement of Corporate Social Responsibility (CSR) Funds	Rp Juta IDR Million	32,139	186,25	132
Jumlah kegiatan yang berkaitan dengan program edukasi literasi keuangan Number of activities related to financial literacy education programs	Jumlah Total	12 Kegiatan Literasi dan 26 Kegiatan Inklusi yang terlaksana 12 Literacy Activities and 26 Inclusion Activities realized	7 Kegiatan Literasi dan 19 Kegiatan Inklusi yang terlaksana 7 Literacy Activities and 19 Inclusion Activities realized	4 Kegiatan Literasi dan 5 Kegiatan Inklusi yang terlaksana 4 Literacy Activities and 5 Inclusion Activities realized

Tata Kelola Keberlanjutan
Sustainability Governance

Penanggung Jawab Penerapan Keuangan Berkelanjutan

Komitmen Perseroan dalam mengimplementasikan prinsip Keuangan Berkelanjutan diwujudkan melalui pembentukan Tim Task Force RAKB berdasarkan Surat Keputusan Direksi No. SKEP/133/SET/BNC/X/2025 tanggal 31 Oktober 2025 tentang Tim Task Force Penyusunan Rencana Aksi Keuangan Berkelanjutan (RAKB). Pembentukan tim ini mencerminkan keseriusan Perseroan dalam memastikan penerapan Keuangan Berkelanjutan dilakukan secara terarah dan terkoordinasi.

Meskipun telah memiliki tim khusus, Direksi tetap memegang tanggung jawab utama atas penerapan Keuangan Berkelanjutan di Perseroan. Direksi secara berkala melaporkan hasil pelaksanaan dan perkembangan implementasi kepada Dewan Komisaris serta regulator sesuai dengan ketentuan yang berlaku.

Tim Task Force terdiri dari 14 (empat belas) anggota yang berasal dari perwakilan Kepala Divisi dan bersifat *ad-hoc*. Pembagian peran dan tanggung jawab masing-masing Kepala Divisi dalam mendukung tata kelola keberlanjutan Perseroan disajikan pada tabel berikut.

Person in Charge of Sustainable Finance Implementation

The Company's commitment to implementing the principles of Sustainable Finance is realized through the establishment of the RAKB Task Force pursuant to Board of Directors' Decree No. SKEP/133/SET/BNC/X/2025 dated 31 October 2025 regarding the Task Force Team for the Preparation of the Sustainable Finance Action Plan (RAKB). The establishment of this team reflects the Company's seriousness in ensuring that the implementation of Sustainable Finance is properly targeted and coordinated.

Despite having a dedicated team, the Board of Directors is still primarily responsible for the implementation of Sustainable Finance within the Company. The Board of Directors periodically reports the results of implementation and progress to the Board of Commissioners and regulators in accordance with applicable regulations.

The Task Force consists of 14 (fourteen) members representing Division Heads and operates on an ad-hoc basis. The division of roles and responsibilities of each Division Head in supporting the Company's sustainability governance is presented in the following table.

Unit/Pejabat Unit/Executive	**Peran dan Tanggung Jawab** Role and Responsibility
Head of Compliance	Ketua Chairperson
Head of Corporate Secretary	Anggota Member
Head of Risk Management	Anggota Member
Head of Regulatory Reporting & Tax	Anggota Member
Head of Treasury	Anggota Member
Head of Funding & Business Network	Anggota Member
Head of Commercial Lending	Anggota Member
Head of Retail, Digital & SME Lending	Anggota Member
Head of IT Security & Governance	Anggota Member

Unit/Pejabat Unit/Executive	Peran dan Tanggung Jawab Role and Responsibility
Head of IT Development	Anggota Member
Head of IT Operations	Anggota Member
Head of Human Resources	Anggota Member
Head of Operations	Anggota Member
Head of Middle Office	Anggota Member

Sejalan dengan sifatnya yang *ad-hoc*, Tim Task Force akan dibubarkan apabila Perseroan telah membentuk unit kerja permanen yang secara khusus bertanggung jawab atas pelaksanaan Keuangan Berkelanjutan serta pengelolaan risiko Lingkungan, Sosial, dan Tata Kelola (LST).

In line with its ad-hoc nature, the Task Force will be dissolved once the Company has established a permanent unit specifically responsible for implementing sustainable finance and managing environmental, social, and governance (ESG) risks.

Pengembangan Kompetensi Terkait Keuangan Berkelanjutan Tahun 2025

Perseroan memahami bahwa keberhasilan pelaksanaan RAKB Tahun 2025 sangat ditentukan oleh peran dan kapasitas sumber daya manusia. Oleh karena itu, penguatan kompetensi karyawan menjadi salah satu fokus utama dalam mendukung implementasi Keuangan Berkelanjutan.

Sepanjang periode pelaporan 2025, Perseroan menyelenggarakan dan mendorong partisipasi karyawan dalam berbagai kegiatan pelatihan, seminar, dan webinar yang mengangkat topik Keuangan Berkelanjutan maupun tema lain yang relevan dengan pencapaian Tujuan Pembangunan Berkelanjutan (TPB).

Perseroan menyambut baik antusiasme karyawan dalam mengikuti program-program pengembangan kompetensi tersebut sebagai bagian dari upaya membangun pemahaman dan kesadaran bersama terhadap pentingnya Keuangan Berkelanjutan. Rincian kegiatan pelatihan yang diikuti selama tahun 2025 disajikan pada tabel berikut.

Development of Competencies Related to Sustainable Finance in 2025

The Company understands that the successful implementation of the 2025 RAKB is largely determined by the role and capacity of human resources. Therefore, strengthening employee competencies is one of the main focuses in supporting the implementation of Sustainable Finance.

Throughout the 2025 reporting period, the Company organized and encouraged employee participation in various training sessions, seminars, and webinars addressing Sustainable Finance topics as well as other topics relevant to achieving the Sustainable Development Goals (SDGs).

The Company welcomes employees' enthusiasm in participating in these competency development programs in an effort to build a shared understanding and awareness of the importance of Sustainable Finance. Details of the training activities attended during 2025 are presented in the following table.

Nama Pelatihan Training	Tanggal Date	Penyelenggara Organizer	Jumlah Peserta Total Participant
Training Climate Risk Management And Scenario Analysis (CRMS) dan Climate Risk Stress Testing (CRST) Climate Risk Management And Scenario Analysis (CRMS) and Climate Risk Stress Testing (CRST) Training	13 & 14 Maret 2025 March 13 & 14, 2025	Learning Media Indonesia (LMI)	11 Orang 11 Persons
Training Rencana Aksi Keuangan Keberlanjutan (RAKB) Sustainable Finance Action Plan (RAKB) Training	20 & 21 Maret 2025 March 20 & 21, 2025	Lembaga Pengembangan Perbankan Indonesia (LPPI)	6 Orang 6 Persons

Manajemen Risiko yang Terintegrasi dengan Aspek Lingkungan, Sosial, dan Tata Kelola (LST)

Seiring dengan pesatnya pertumbuhan industri perbankan dengan layanan digital di Indonesia, Perseroan menyadari pentingnya penerapan sistem manajemen risiko yang terukur dan terintegrasi sebagai fondasi penerapan prinsip Keuangan Berkelanjutan.

Sebagai bank dengan layanan digital, kebijakan dan kerangka manajemen risiko Perseroan tetap mengacu pada POJK No. 18/POJK.03/2016 tanggal 16 Maret 2016 tentang Penerapan Manajemen Risiko bagi Bank Umum serta POJK No. 4/POJK.03/2016 tanggal 27 Januari 2016 tentang Penilaian Tingkat Kesehatan Bank Umum.

Selain memenuhi ketentuan regulator, Perseroan secara berkelanjutan melakukan penyempurnaan terhadap kebijakan dan prosedur manajemen risiko internal agar pengelolaan risiko LST dapat dilakukan secara lebih sistematis dan terukur. Pendekatan ini mengedepankan prinsip kehati-hatian untuk mencegah, mengurangi, dan meminimalkan potensi dampak negatif yang dapat timbul apabila prinsip Keuangan Berkelanjutan tidak dijalankan secara konsisten.

Secara umum, penerapan manajemen risiko melibatkan seluruh unit kerja sebagai risk owner dan Perseroan juga memastikan bahwa seluruh pejabat pada setiap tingkatan telah memiliki Sertifikasi Manajemen Risiko sesuai ketentuan.

Risk Management Integrated with Environmental, Social, and Governance (ESG) Aspects

In line with the rapid growth of banking with digital services industry in Indonesia, the Company recognizes the importance of implementing a measurable and integrated risk management system as the foundation for the application of Sustainable Finance principles.

As a bank with digital services, the Company's risk management policies and framework still refer to POJK No. 18/POJK.03/2016 dated March 16, 2016, regarding the Implementation of Risk Management for Commercial Banks, as well as POJK No. 4/POJK.03/2016 dated January 27, 2016, regarding the Assessment of Commercial Bank Soundness.

In addition to complying with regulatory requirements, the Company continuously refines its internal risk management policies and procedures to ensure that ESG risk management is conducted in a more systematic and measurable manner. This approach prioritizes the principle of prudence to prevent, reduce, and minimize potential negative impacts that may arise if the principles of Sustainable Finance are not consistently implemented.

In general, the implementation of risk management involves all business units as risk owners, and the Company also ensures that all officers at every level possess Risk Management Certification in accordance with regulations.

Dalam rangka menjaga efektivitas RAKB dan mencegah risiko yang berpotensi menghambat pencapaiannya, Perseroan menerapkan sistem pengendalian internal dengan pendekatan *Three Lines Model*, yang mencakup:

1. Linie Pertama (*First Line*) dijalankan oleh seluruh unit kerja operasional yang bertanggung jawab langsung atas pelaksanaan kegiatan usaha Perseroan, seluruh unit kerja berperan dalam mengidentifikasi, mengelola, dan mengendalikan risiko yang melekat pada aktivitas operasional Perseroan.
2. Lini Kedua (*Second Line*) dijalankan oleh fungsi independen Satuan Kerja Manajemen Risiko dan Satuan Kerja Kepatuhan yang memastikan risiko dan kepatuhan Perseroan dikelola secara terstruktur, terukur, dan selaras dengan strategi Perseroan. Lini Kedua juga bertanggung jawab dalam menetapkan kerangka kerja, kebijakan, serta metodologi pengelolaan risiko dan kepatuhan termasuk melakukan pemantauan atas penerapannya di Perseroan.
3. Lini Ketiga (Third Line) dijalankan oleh fungsi independen Satuan Kerja Audit Intern yang bertanggung jawab atas pengendalian intern dan melakukan assurance melalui aktivitas audit internal untuk memastikan efektivitas pengendalian Perseroan secara menyeluruh.

Sepanjang tahun 2025, Perseroan telah mengimplementasikan pendekatan tersebut secara konsisten. Hasilnya, Perseroan tetap mampu menjalankan fungsi intermediasi secara optimal di tengah berbagai tantangan yang dihadapi.

Pengawasan Aktif Direksi dan Dewan Komisaris

Direksi melakukan pengawasan langsung atas pelaksanaan manajemen risiko melalui rapat-rapat rutin bersama unit kerja terkait. Komite Manajemen Risiko. Di sisi lain, Dewan Komisaris menjalankan fungsi pengawasan terhadap penerapan manajemen risiko secara menyeluruh, termasuk penyusunan dan implementasi kebijakan, sistem pengendalian internal, kepatuhan terhadap peraturan, pencapaian target kinerja, kebijakan sumber daya manusia, serta pelaksanaan program anti-pencucian uang dan pencegahan pendanaan terorisme sesuai UU-TPPU.

To maintain the effectiveness of the RAKB and prevent risks that could hinder its achievement, the Company implements an internal control system using the Three Lines Model approach, which includes:

1. The First Line is carried out by all operational business units directly responsible for the Company's business activities; all units are involved in identifying, managing, and controlling risks inherent in the Company's operational activities.
2. The Second Line is carried out by the independent Risk Management Unit and Compliance Unit, which ensure that the Company's risks and compliance are managed structurally, measurably, and in alignment with the Company's strategy. The Second Line is also responsible for establishing the framework, policies, and methodologies for risk and compliance management, including monitoring their implementation within the Company.
3. The Third Line is carried out by the independent Internal Audit Unit, which is responsible for internal controls and provides assurance through internal audit activities to ensure the overall effectiveness of the Company's controls.

The Company has consistently implemented this approach throughout 2025. As a result, the Company has remained capable of performing its intermediary functions optimally amidst various challenges.

Active Supervision by the Board of Directors and Board of Commissioners

The Board of Directors directly supervises the implementation of risk management through regular meetings with t he Risk Management Committee. The Board of Commissioners also oversees the comprehensive implementation of risk management, including the formulation and implementation of policies, internal control systems, regulatory compliance, achievement of performance targets, human resources policies, and the implementation of anti-money laundering and counter-terrorism financing programs in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Law.

Sebagai pilar utama tata kelola Perseroan, Direksi dan Dewan Komisaris secara bersama-sama melakukan evaluasi berkala untuk memastikan bahwa penerapan manajemen risiko Perseroan berada dalam batas *Risk Appetite* dan *Risk Tolerance* yang telah ditetapkan serta melakukan pemantauan secara berkala.

As the main pillars of the Company's governance, the Board of Directors and the Board of Commissioners jointly conduct periodic evaluations to ensure that the Company's risk management implementation remains within the established Risk Appetite and Risk Tolerance limits and conduct regular monitoring.

Dalam menjalankan kegiatan usaha sebagai bank dengan layanan digital, Perseroan berupaya mengintegrasikan aspek LST ke dalam seluruh proses bisnis dan pengambilan keputusan, khususnya dalam mendukung pembiayaan yang berkelanjutan.

In conducting business operations as a bank with digital services, the Company strives to integrate ESG aspects into all business processes and decision-making, particularly in supporting sustainable financing.

Pada tahun 2025, Perseroan telah melakukan identifikasi dan analisis secara komprehensif terhadap risiko-risiko LST yang relevan, sebagaimana disajikan pada tabel berikut.

In 2025, the Company has conducted a comprehensive identification and analysis of relevant ESG risks, as presented in the following table.

Topik Topic	**Risiko** Risk	**Mitigasi** Mitigation
Lingkungan Environmental	• Risiko penyaluran kredit untuk kegiatan usaha yang berpotensi merusak keseimbangan ekosistem lingkungan hidup. • Kegiatan operasional Bank sehari-hari membawa dampak negatif bagi lingkungan hidup, misalnya dalam hal penggunaan energi yang berlebihan. • Risk of extending loans for business activities that have the potential to damage the balance of the environmental ecosystem. • The Bank's daily operational activities have a negative impact on the environment, for example in terms of excessive use of energy.	• Bank melakukan due diligence secara ketat terhadap profil risiko calon debitur sebelum menyetujui pemberian fasilitas kredit. • Bank mendukung penerapan keuangan berkelanjutan dengan memperkuat tanggung jawab sosial Bank serta pengembangan bisnis berkelanjutan, serta melakukan penilaian dan pengelolaan risiko lingkungan dan sosial atas pembiayaan suatu proyek. • The Bank carries out strict due diligence on the risk profile of prospective borrowers before agreeing to grant loan facilities. • The Bank supports the implementation of sustainable finance by strengthening the Bank's social responsibility and sustainable business development, as well as conducting environmental and social risk assessment and management for project financing.
Sosial Social	• Ketidakmerataan kompetensi dan kemampuan SDM dalam hal penerapan keuangan berkelanjutan. • Penyaluran bantuan atau pelaksanaan kegiatan CSR yang tidak tepat sasaran. • Rusaknya citra dan reputasi Bank karena ada isu negatif yang berkembang. • Inequality of HR competence and capabilities in terms of implementing sustainable finance. • Distribution of assistance or implementation of CSR activities that are not on target. • Damage to the Bank's image and reputation due to negative issues developing.	• Meningkatkan kegiatan sosialisasi internal bagi manajemen dan karyawan terkait penerapan keuangan berkelanjutan di Bank. • Mendorong keterlibatan aktif masyarakat dalam berbagai kegiatan Bank. • Mengadakan kegiatan literasi keuangan secara berkala. • Memiliki kebijakan anti-fraud. • Improve internal dissemination activities for management and employees regarding the implementation of sustainable finance at the Bank. • Encourage active community involvement in various Bank activities. • Conduct financial literacy activities on a regular basis. • Enforce an anti-fraud policy.

Topik Topic	Risiko Risk	Mitigasi Mitigation
Tata Kelola Governance	• Ketidakpatuhan Bank dalam merealisasikan target-target RAKB. • The Bank's non-compliance in realizing RAKB targets.	• Melakukan monitoring implementasi keuangan berkelanjutan di Bank. • Melakukan evaluasi berkala (basis kuartalan) untuk mengukur pencapaian target-target keuangan berkelanjutan Bank. • To monitor the implementation of sustainable finance within the Bank.To conduct periodic evaluations (on a quarterly basis) to assess the achievement of the Bank's sustainable finance targets.

Secara Umum, proses identifikasi, pengukuran, pemantauan, dan pengendalian risiko dapat dilihat pada Laporan Tahunan Perseroan dalam bab Penerapan Manajemen Risiko. Perseroan juga didukung oleh sistem informasi manajemen risiko yang mampu menyajikan data secara akurat dan tepat waktu kepada Dewan Komisaris, Direksi, dan Komite terkait.

Komitmen terhadap Anti-Korupsi dan Anti-Penyuapan

Perseroan menjalankan kegiatan usaha dengan menjunjung tinggi prinsip tata kelola perusahaan yang baik. Sejalan dengan hal tersebut, Perseroan menerapkan kebijakan *zero tolerance* terhadap segala bentuk korupsi, suap, balas jasa, dan/atau gratifikasi.

Komitmen ini dituangkan dalam Prosedur Anti-Suap dan Anti-Korupsi yang telah disahkan oleh Direktur Utama melalui SK No. SK/035-2/SET/BNC/VI/2021 tanggal 4 Juni 2021. Kebijakan ini berlaku mengikat bagi seluruh insan Perseroan, termasuk karyawan tetap maupun tidak tetap, Direksi, Dewan Komisaris, serta pihak ketiga seperti konsultan, vendor, dan mitra kerja lainnya.

Sebagai bagian dari implementasi kebijakan tersebut, setiap insan BNC diwajibkan untuk melaporkan penerimaan gratifikasi sesuai ketentuan yang berlaku. Dengan adanya kebijakan tertulis ini, Perseroan secara konsisten menciptakan lingkungan kerja yang bersih, transparan, dan bebas dari praktik korupsi, kolusi, dan nepotisme (KKN).

In general, the risk identification, measurement, monitoring, and control processes are outlined in the Company's Annual Report under the Risk Management Implementation section. The Company is also supported by a risk management information system capable of providing accurate and timely data to the Board of Commissioners, the Board of Directors, and relevant committees.

Commitment to Anti-Corruption and Anti-Bribery

The Company conducts its business operations by upholding the principles of good corporate governance. In line with this commitment, the Company enforces a zero-tolerance policy against all forms of corruption, bribery, kickbacks, and/or gratification.

This commitment is outlined in the Anti-Bribery and Anti-Corruption Procedures, which were approved by the President Director via Decree No. SK/035-2/SET/BNC/VI/2021 dated June 4, 2021. This policy is binding for all Company personnel, including permanent and non-permanent employees, the Board of Directors, the Board of Commissioners, as well as third parties such as consultants, vendors, and other business partners.

As part of the implementation of this policy, every BNC personnel is required to report the receipt of any gratification in accordance with applicable regulations. With this written policy, the Company consistently fosters a clean and transparent work environment that is free from corruption, collusion, and nepotism (KKN)

Pelibatan Pemangku Kepentingan

Perseroan meyakini bahwa keterlibatan dan dukungan pemangku kepentingan memiliki peran penting dalam menjaga keberlanjutan usaha jangka panjang. Oleh karena itu, Perseroan secara aktif membangun hubungan yang harmonis dan terbuka dengan seluruh kelompok pemangku kepentingan serta melibatkan mereka dalam pelaksanaan program Tanggung Jawab Sosial dan Lingkungan (TJSL).

Pemetaan kelompok pemangku kepentingan utama yang terdampak maupun yang memberikan pengaruh terhadap aktivitas operasional Perseroan disajikan dalam tabel berikut.

Stakeholder Engagement

The Company believes that stakeholder engagement and support are vital to maintain long-term business sustainability. Therefore, the Company actively builds harmonious and open relationships with all stakeholder groups and involves them in the implementation of its Social and Environmental Responsibility (TJSL) programs.

The mapping of key stakeholder groups that are affected by or influence the Company's operational activities is presented in the following table.

Pemangku Kepentingan Stakeholders	**Metode Pelibatan** Engagement Method	**Isu dan Pertimbangan Terkait** Related Issues and Considerations
Nasabah Customers	• Survei kepuasan nasabah. • Komunikasi melalui media sosial dan layanan *call center.* • Komunikasi sehari-hari di kantor pusat atau cabang. • Customer satisfaction survey. • Communication through social media and call center services. • Daily communication at head office or branches.	• Kenyamanan, keamanan, dan kelancaran bertransaksi. • Informasi produk dan layanan keuangan. • Keamanan data nasabah. • Convenience, security, and smooth transactions. • Information on financial products and services. • Security of customer data.
Karyawan Employees	• *Townhall meeting.* • *Induction* untuk karyawan baru. • Pelatihan atau pendidikan. • Kegiatan keagamaan. • Mini Townhall meetings. • Induction for new employees. • Training or education. • Religious activities.	• Hubungan industrial yang harmonis. • Keamanan dan keselamatan kerja. • Dukungan pengembangan kompetensi dan pengembangan karier. • Keberlangsungan usaha Bank. • Harmonious industrial relations. • Occupational health and safety. • Support for competency and career development. • Continuity of the Bank's business.
Masyarakat Community	• Pelibatan tenaga kerja. • Kunjungan/komunikasi dengan masyarakat dan pelaksanaan program CSR. • Workforce engagement. • Visits/communication with the community and implementation of CSR programs.	• Mendapatkan dampak nyata yang positif dari kegiatan Bank. • Mendapatkan informasi mengenai produk dan layanan keuangan yang akurat. • Obtain a positive real impact from the Bank's activities. • Obtain accurate information about financial products and services.
Regulator Regulators	• Sosialisasi peraturan. • Penyampaian laporan sesuai ketentuan regulator. • Pelaksanaan pengawasan. • Dissemination of regulations. • Submission of reports according to regulatory provisions. • Supervision implementation.	• Kepatuhan terhadap regulasi. • Pelaksanaan keuangan berkelanjutan. • Dukungan terhadap program literasi, inklusi, dan pembangunan berkelanjutan. • Pelaporan berkala. • Regulatory compliance. • Implementation of sustainable finance. • Support for Literacy, Inclusion, and Sustainable Development programs. • Periodic reporting.

Pemangku Kepentingan Stakeholders	**Metode Pelibatan** Engagement Method	**Isu dan Pertimbangan Terkait** Related Issues and Considerations
Investor dan Pemegang Saham Investors and Shareholders	• Rapat Umum Pemegang Saham (RUPS). • Laporan keuangan triwulanan. • Laporan keuangan tahunan. • Laporan keberlanjutan. • Public expose. • General Meeting of Shareholders (GMS). • Quarterly financial report. • Annual financial report. • Sustainability report. • Public exposes.	• Kinerja ekonomi. • Keberlangsungan usaha. • Implementasi prinsip-prinsip GCG. • Citra dan reputasi Bank. • Economic performance. • Business continuity. • Implementation of GCG principles. • Image and reputation of the Bank.
Mitra Bisnis Business Partners	• Kontrak dan perjanjian kerja. • Seleksi dan penilaian kinerja vendor atau mitra. • Pakta integritas. • Prosedur anti-suap dan anti-korupsi. • Kebijakan anti-fraud. • Work contracts and agreements. • Selection and performance appraisal of vendors/partners. • Integrity pact. • Anti-bribery and anti-corruption procedures. • Anti-fraud policy.	• Transparansi proses seleksi dan evaluasi vendor/mitra secara objektif. • Proses pengadaan barang dan jasa yang adil dan transparan. • Termin pembayaran tepat waktu sesuai perjanjian kerja sama. • Transparency and objectivity in vendor/partner selection and evaluation. • Fair and transparent procurement process for goods and services. • Timely payment terms according to the cooperation agreement.
Komunitas/ Asosiasi Communities/ Associations	• Pertemuan dan diskusi dengan komunitas/asosiasi. • Meetings and discussions with communities/associations.	• Sosialisasi dan menyebarkan informasi mengenai produk dan layanan Bank kepada komunitas yang sesuai dengan kebutuhan keuangan anggota • Menginformasikan terkait kehadiran Bank kepada komunitas yang mewakili target audiens Bank • Providing education and spread information about the Bank's products and services to communities that align with the financial needs of their members. • Informing communities that represent the Bank's target audience about the presence of the Bank.

Permasalahan, Perkembangan, dan Pengaruh Penerapan Keuangan Berkelanjutan Tahun 2025

Dalam pelaksanaan prinsip Keuangan Berkelanjutan sepanjang tahun 2025, Perseroan masih menghadapi sejumlah tantangan yang memengaruhi optimalisasi realisasi Rencana Aksi Keuangan Berkelanjutan (RAKB), khususnya pada aspek penghimpunan dana (*funding*) dan penyaluran pembiayaan (*lending*).

Perseroan telah berpartisipasi dalam penyaluran pembiayaan berwawasan keberlanjutan melalui skema *channeling* dengan pihak eksternal, termasuk penyedia layanan *peer-to-peer lending*. Namun demikian, mengingat mekanisme penyaluran tersebut melibatkan pihak ketiga, realisasi pembiayaan sangat dipengaruhi oleh ketersediaan portofolio pembiayaan yang memenuhi kriteria *risk acceptance* Perseroan serta kesiapan pendanaan dari mitra *channeling*. Kondisi tersebut menjadi salah satu faktor pembatas dalam upaya peningkatan skala pembiayaan berkelanjutan.

Di samping itu, produk pembiayaan Usaha Mikro, Kecil, dan Menengah (UMKM) berbasis digital yang dikembangkan secara internal masih memerlukan penyempurnaan lebih lanjut. Penyempurnaan tersebut dilakukan dengan mempertimbangkan hasil evaluasi yang diperoleh dari pelaksanaan tahap uji coba terbatas guna memastikan kesiapan produk dari aspek manajemen risiko, operasional, dan kepatuhan terhadap ketentuan yang berlaku.

Ke depan, Perseroan merencanakan peningkatan produk tabungan bagi nasabah perorangan yang mengusung konsep keberlanjutan. Melalui produk tersebut, sebagian komponen bunga tabungan direncanakan akan dialokasikan untuk mendukung kegiatan pelestarian alam dan konservasi lingkungan sebagai bagian dari kontribusi Perseroan terhadap pembangunan berkelanjutan.

Issues, Developments, and Impacts of Sustainable Finance Implementation in 2025

In implementing the principles of Sustainable Finance throughout 2025, the Company still faces a number of challenges that influence the optimal realization of the Sustainable Finance Action Plan (RAKB), particularly in the areas of funding and lending.

The Company has participated in the disbursement of sustainable financing through a channeling scheme with external parties, including peer-to-peer lending service providers. However, since this channeling mechanism involves third parties, the realization of financing is significantly influenced by the availability of a financing portfolio that meets the Company's risk acceptance criteria, as well as the funding readiness of the channeling partners. These conditions become one of the limiting factors that hinder sustainable financing scale-up efforts.

Furthermore, the internally developed digital-based financing products for Micro, Small, and Medium Enterprises (MSMEs) still require further refinement. This refinement is carried out by considering the evaluation results obtained from the implementation of a limited trial phase to ensure the product's readiness in terms of risk management, operations, and compliance with applicable regulations.

Moving forward, the Company plans to enhance savings products for individual customers that incorporate a sustainability concept. Through these products, a portion of the savings interest will be allocated to support nature preservation and environmental conservation activities as part of the Company's contribution to sustainable development.

Membangun Budaya Keberlanjutan

Building a Culture of Sustainability



Perseroan berkomitmen untuk berperan aktif dalam mendukung pencapaian Tujuan Pembangunan Berkelanjutan (*Sustainable Development Goals/SDGs*) melalui penerapan strategi Keuangan Berkelanjutan yang terintegrasi dalam seluruh kegiatan operasional. Perseroan memahami bahwa pencapaian tujuan tersebut memerlukan keterlibatan menyeluruh serta keselarasan pemahaman seluruh unsur organisasi terhadap prinsip keberlanjutan dan penerapan Keuangan Berkelanjutan di lingkungan Perseroan.

Sejalan dengan komitmen tersebut, Perseroan secara berkesinambungan mengintegrasikan aspek Lingkungan, Sosial, dan Tata Kelola (LST) ke dalam proses pengambilan keputusan bisnis. Selain itu, Perseroan telah melakukan penyesuaian struktur organisasi melalui pembentukan *Task Force* yang memiliki tanggung jawab dalam mengoordinasikan dan memantau pencapaian target keberlanjutan sebagaimana diamanatkan dalam Peraturan Otoritas Jasa Keuangan Nomor 51/POJK.03/2017.

The Company is committed to actively supporting the achievement of the Sustainable Development Goals (SDGs) through the implementation of a Sustainable Finance strategy that is integrated into all operational activities. The Company understands that these goals require comprehensive engagement and alignment of understanding among all organizational elements regarding sustainability principles and the implementation of Sustainable Finance within the Company.

In line with this commitment, the Company continuously integrates Environmental, Social, and Governance (ESG) aspects into business decision-making processes. Furthermore, the Company has adjusted its organizational structure by establishing a Task Force responsible for coordinating and monitoring the achievement of sustainability targets as mandated by Financial Services Authority Regulation No. 51/POJK.03/2017.

Dengan menempatkan Keuangan Berkelanjutan sebagai salah satu pilar utama dalam pelaksanaan kegiatan usaha, Perseroan menegaskan komitmennya untuk menjaga keseimbangan prinsip *triple bottom line*, yang meliputi pencapaian kinerja ekonomi *(profit)*, pemenuhan tanggung jawab sosial *(people)*, serta kepedulian terhadap pelestarian lingkungan hidup *(planet)*.

By positioning Sustainable Finance as one of the main pillars in the implementation of business activities, the Company reaffirms its commitment to maintaining the balance of the triple bottom line principle, which encompasses economic performance (profit), fulfillment of social responsibility (people), and concern for environmental conservation (planet).

Dalam rangka menanamkan dan memperkuat budaya keberlanjutan, khususnya pada aspek pengelolaan lingkungan hidup, Perseroan secara konsisten melaksanakan berbagai inisiatif tahunan. Inisiatif tersebut antara lain mencakup kampanye efisiensi penggunaan energi listrik dan air di lingkungan kerja, serta upaya pengurangan konsumsi kertas dan penggunaan sampah plastik dalam kegiatan operasional sehari-hari.

To instill and strengthen the sustainability culture, particularly regarding environmental management, the Company consistently carries out various initiatives every year. These initiatives include campaigns to promote the efficient use of electricity and water in the workplace, as well as efforts to reduce paper consumption and the use of plastic waste in daily operations.

Pada aspek sosial, Perseroan mendorong peningkatan kepedulian dan empati sosial karyawan melalui keterlibatan aktif dalam pelaksanaan program Tanggung Jawab Sosial Perusahaan (*Corporate Social Responsibility/ CSR*) serta kegiatan literasi keuangan yang dilaksanakan secara berkelanjutan sebagai bagian dari agenda tahunan. Selain itu, publikasi Laporan Keberlanjutan secara berkala juga dimanfaatkan sebagai sarana komunikasi untuk memperkenalkan serta memperkuat penerapan budaya keberlanjutan kepada para pemangku kepentingan.

In the social aspect, the Company encourages increased social awareness and empathy among employees through active participation in the implementation of Corporate Social Responsibility (CSR) programs as well as financial literacy activities conducted on an ongoing basis as part of the annual agenda. Additionally, the periodic publication of the Sustainability Report is utilized as a communication platform to introduce and reinforce the implementation of a sustainability culture among stakeholders.

Untuk mendukung pencapaian keberlanjutan usaha, Perseroan memperkuat komitmennya melalui penyusunan kerangka kerja, *roadmap*, serta kebijakan dan pedoman LST yang terintegrasi dengan tata kelola berkelanjutan. Seluruh sasaran strategis dan komitmen keberlanjutan Perseroan telah dirumuskan dan diuraikan lebih lanjut dalam Rencana Aksi Keuangan Berkelanjutan (RAKB) Tahun 2025.

To support the achievement of business sustainability, the Company solidifies its commitment through the development of a framework, roadmap, as well as integrated ESG policies and guidelines aligned with sustainable governance. All of the Company's strategic objectives and sustainability commitments have been formulated and further elaborated in the 2025 Sustainable Finance Action Plan (RAKB).

Kinerja Ekonomi

Economic Performance

Kinerja ekonomi merupakan salah satu aspek yang menjadi perhatian utama bagi pemegang saham dan pemangku kepentingan lainnya. Pencapaian kinerja ekonomi yang sehat diyakini menjadi fondasi penting dalam menjaga keberlanjutan usaha Perseroan dalam jangka panjang.

Tabel berikut menyajikan perbandingan antara target dan realisasi kinerja portofolio, termasuk target pembiayaan atau investasi pada instrumen keuangan maupun proyek yang selaras dengan penerapan Keuangan Berkelanjutan sepanjang tahun 2025.

Perbandingan Target dan Kinerja Portofolio, Target Pembiayaan, atau Investasi pada Instrumen Keuangan atau Proyek yang Sejalan dengan Penerapan Keuangan Berkelanjutan

Sepanjang tahun 2025, Perseroan masih berada pada fase penguatan fondasi dalam implementasi keuangan berkelanjutan, sehingga perbandingan antara target dan realisasi belum dapat disajikan secara kuantitatif. Fokus strategis diarahkan pada pengembangan kapabilitas internal, optimalisasi penghimpunan dana (funding), serta peningkatan awareness dan penetrasi inisiatif tabungan NEO Green sebagai bagian dari positioning Perseroan dalam ekosistem bank dengan layanan digital berkelanjutan.

Sejalan dengan pendekatan bertahap tersebut, Perseroan terus mengembangkan portofolio pembiayaan berkelanjutan dengan realisasi mencapai Rp160,5 juta hingga akhir 2025. Capaian ini mencerminkan langkah awal dalam mendukung pertumbuhan pembiayaan berkelanjutan yang lebih terstruktur dan terukur pada periode mendatang, seiring dengan penguatan strategi, tata kelola, dan kesiapan operasional Perseroan.

Dari sisi jumlah rekening (Number of Accounts/ NoA), Perseroan mencatat peningkatan yang signifikan sebagai refleksi dari strategi ekspansi berbasis digital dan penguatan akuisisi nasabah. NoA produk Tabungan Neo Green, posisi tanggal 31 Desember 2025 telah memiliki 29.298 rekening. Pertumbuhan ini menunjukkan tingginya respons pasar terhadap produk yang ditawarkan, sekaligus menjadi indikasi awal keberhasilan Perseroan dalam membangun basis nasabah yang lebih luas sebagai fondasi untuk pengembangan portofolio berkelanjutan ke depan.

Economic performance is one of the key areas of focus for shareholders and other stakeholders. Achieving sound economic performance is believed to be a crucial foundation that ensures the long-term sustainability of the Company's business.

The following table presents a comparison between targets and realization of portfolio performance, including financing or investment targets in financial instruments or projects aligned with the implementation of Sustainable Finance throughout 2025.

Comparison of Portfolio Targets and Performance, Financing Targets, or Investments in Financial Instruments or Projects Aligned with the Implementation of Sustainable Finance.

Throughout 2025, the Company is still in the phase of strengthening its foundation for the implementation of sustainable finance, as such, a quantitative comparison between targets and actual realization has not yet been established. The strategic focus is directed toward developing internal capabilities, optimizing funding, as well as increasing awareness and penetration of the NEO Green savings initiative as part of the Company's positioning within the sustainable ecosystem of banks with digital services.

In line with this progressive approach, the Company continues to expand its sustainable financing portfolio, with realization reaching Rp160.5 million by the end of 2025. This achievement reflects an initial step in supporting more structured and measurable growth in sustainable financing over the coming period, while strengthening the Company's strategy, governance, and operational readiness.

In terms of the Number of Accounts (NoA), the Company recorded a significant increase, reflecting its digital-based expansion strategy and strengthened customer acquisition efforts. As of December 31, 2025, the NoA for the Neo Green Savings product stood at 29,298 accounts. This growth demonstrates the market's strong response to the products offered, while also serving as an early indication of the Company's success in building a broader customer base as a foundation for sustainable portfolio development moving forward.

Tahun Year	Satuan Unit	2025	2024	2023
Jumlah produk yang memenuhi kriteria kegiatan usaha berkelanjutan Number of products that meet the criteria for sustainable business activities				
Penghimpunan Dana (Dana Pihak Ketiga) Fundraising (Third Party Fund)	Rp Juta IDR Million	-	-	-
	Jumlah Total	-	-	-
Penyaluran Dana (Total Kredit) Fund Disbursement (Total Loan)	Rp Juta IDR Million	160,5	-	98.927
Total Aset Produktif Kegiatan Usaha Berkelanjutan Total Earning Assets of Sustainable Business Activities				
Total Kredit/ Pembiayaan Kegiatan Usaha Berkelanjutan Total Loans/Financing for Sustainable Business Activities	Rp Juta IDR Million	160,5	-	98.927
Total Non- Kredit/ Pembiayaan NonKegiatan Usaha Berkelanjutan Total Non-Loans/ Financing for Non-Sustainable Business Activities	Rp Juta IDR Million	-	-	157.046
Persentase total kredit untuk kegiatan usaha berkelanjutan terhadap total kredit Bank Percentage of total loans for sustainable business activities to the Bank's total loans	%	-	-	0,97%

Adapun jenis penyaluran kredit yang telah diberikan Perseroan dan sejalan dengan prinsip Keuangan Berkelanjutan selama periode pelaporan disajikan pada tabel berikut.

The types of loans disbursed by the Company that are in line with the principles of sustainable finance during the reporting period are presented in the following table.

Tahun Year	Satuan Unit	2025	2024	2023
Pembiayaan Bangunan Ramah Lingkungan Green Building Financing	Rp Juta IDR Million	-	-	-
Pembiayaan Energi Terbarukan (pembangkit listrik tenaga air, tenaga sampah, dan lain-lain) Renewable Energy Financing (hydropower, waste power, etc.)	Rp Juta IDR Million	-	-	-
Pengelolaan Sumber Daya Alam Hayati dan Penggunaan Lahan yang Berkelanjutan Sustainable Management of Living Natural Resources and Land Use	Rp Juta IDR Million	-	-	98.927

Uraian lebih lengkap mengenai pencapaian target keuangan, realisasi rencana kerja tahun 2025, serta analisis mendalam atas kinerja keuangan Perseroan dapat ditemukan pada Bab Analisis dan Diskusi Manajemen dalam Laporan Tahunan 2025, yang merupakan satu kesatuan dengan Laporan Keberlanjutan 2025.

Further details regarding the achievement of financial targets, the implementation of the 2025 work plan, and an in-depth analysis of the Company's financial performance can be found in the Management Analysis and Discussion section of the 2025 Annual Report, which is an integral part of the 2025 Sustainability Report.

Kinerja Lingkungan Hidup

Environmental Performance

Biaya Lingkungan Hidup Tahun 2025

Perseroan belum memiliki anggaran khusus untuk pelaksanaan kegiatan CSR di bidang lingkungan hidup, baik terkait pengelolaan limbah maupun aktivitas lingkungan lainnya. Hal ini disebabkan oleh status kantor pusat Perseroan yang masih menempati area sewa di Gedung Treasury, di mana seluruh pengelolaan lingkungan hidup dikelola oleh manajemen gedung. Biaya terkait pengelolaan tersebut telah termasuk dalam komponen *service charge* yang dibayarkan oleh Perseroan bersama penyewa lainnya.

Penggunaan Material Ramah Lingkungan

Walaupun kegiatan usaha Perseroan tidak berkaitan langsung dengan pengelolaan lingkungan hidup, Perseroan secara aktif melaksanakan pelatihan *sustainability* untuk meningkatkan *awareness* karyawan terhadap prinsip keberlanjutan dan praktik bisnis yang bertanggung jawab.

Menekan Konsumsi Kertas

Sejalan dengan karakteristik kegiatan usaha berbasis perkantoran, sumber limbah utama Perseroan berasal dari aktivitas administratif, yang antara lain tercermin dari penggunaan kertas di kantor pusat (KP) dan kantor cabang (KC) yang pada tahun 2025 mencapai 755 rim (KP: 395 rim; KC: 360 rim). Dalam konteks tersebut, Perseroan memandang pengelolaan limbah, khususnya limbah kertas, sebagai bagian dari upaya pengelolaan operasional yang bertanggung jawab.

Meskipun Perseroan belum memiliki mekanisme khusus yang terstruktur dalam pengelolaan limbah, pendekatan yang dilakukan diarahkan pada upaya pencegahan melalui peningkatan efisiensi penggunaan sumber daya. Hal ini diwujudkan melalui penguatan inisiatif digitalisasi proses kerja, termasuk pemanfaatan dokumen elektronik, sistem persetujuan berbasis digital, serta optimalisasi komunikasi tanpa kertas (*paperless*). Pendekatan tersebut menjadi langkah awal dalam mendukung pengelolaan limbah yang lebih efektif secara bertahap, sejalan dengan komitmen Perseroan untuk meningkatkan praktik operasional yang berkelanjutan di masa mendatang.

Environmental Costs in 2025

The Company currently does not have a separate budget for the implementation of CSR activities in the environmental sector, whether related to waste management or other environmental activities. This is due to the fact that the Company's head office is still located in a leased space within the Treasury Building, where all environmental management is handled by the building's management. Costs associated with such management are included in the service charge paid by the Company along with other tenants.

Use of Environmentally Friendly Materials

Although the Company's business operations are not directly related to environmental management, the Company actively conducts sustainability training to enhance employees' awareness of sustainability principles and responsible business practices.

Reducing Paper Consumption

In line with the characteristics of office based business activities, the Company's main waste are from administrative activities, including from the use of paper at head office (KP) and branch office (KCP) in 2025 which was recorded at 755 reams (KP: 395 reams; KC: 360 reams). In this context, the Company views waste management, particularly paper waste, as part of its efforts toward responsible operational management.

Although the Company does not yet have a specific, structured mechanism for waste management, its approach focuses on prevention through improved resource efficiency. This is realized through the strengthening of initiatives to digitize work processes, including the use of electronic documents, digital-based approval systems, and the optimization of paperless communication. This approach serves as an initial step toward supporting more effective waste management over time, in line with the Company's commitment to enhancing sustainable operational practices in the future.

Secara internal, Perseroan telah melakukan transformasi proses bisnis dari berbasis kertas menjadi digital, antara lain melalui pengisian formulir nasabah secara elektronik, penggunaan *e-statement*, materi pelatihan digital, sosialisasi internal daring, serta optimalisasi komunikasi melalui surat elektronik. Di sisi layanan, Perseroan juga memanfaatkan teknologi informasi melalui *Call Center, Mobile Banking,* dan media sosial.

Internally, the Company has transformed its business processes from paper-based to digital, including through electronic completion of customer forms, the use of e-statements, digital training materials, online internal communications, and the optimization of communication via email. In terms of services, the Company also leverages information technology through Call Centers, Mobile Banking, and social media.

Pendekatan *Reduce* dan *Reuse* diterapkan secara konsisten, antara lain:

The Reduce and Reuse approaches are consistently applied, including:

Reduce

- Meneliti dokumen sebelum dicetak untuk menghindari pencetakan ulang;
- Menerapkan pencetakan bolak-balik;
- Mengutamakan pengiriman dokumen secara digital.
- Reviewing documents before printing to avoid reprinting;
- Implementing double-sided printing;
- Prioritizing digital document delivery.

Reuse

- Menggunakan kembali kertas bekas yang masih kosong untuk pencetakan draf dokumen.
- Reusing blank sides of used paper for printing document drafts.

Sebagai bank dengan layanan digital, Perseroan telah menggunakana layanan *e-statement* melalui aplikasi Neobank. Penggunakan *e-statement* diperkirakan dapat menghemat sekitar 35 ribu rim kertas per tahun.

As a bank with digital services institution, the Company has implemented e-statement services through the Neobank application. The use of e-statements is estimated to save approximately 35 thousand reams of paper annually.

Efisiensi Penggunaan Energi Listrik

Electricity Efficiency

Dalam kegiatan operasional sehari-hari, Perseroan memanfaatkan energi listrik untuk mendukung penggunaan perangkat kerja elektronik seperti komputer, mesin fotokopi, pendingin ruangan (AC), dan fasilitas gedung lainnya. Kebutuhan energi yang tidak terhindarkan ini mendorong Perseroan untuk menerapkan langkah-langkah efisiensi sebagai bagian dari komitmen terhadap lingkungan.

In daily operations, the Company utilizes electricity to power electronic devices such as computers, photocopiers, air conditioners (AC), and other building facilities. This unavoidable energy demand has prompted the Company to implement efficiency measures as part of its environmental commitment.

Hingga saat ini, Perseroan masih menggunakan pasokan listrik berbasis bahan bakar fosil dari PLN dan belum memanfaatkan energi terbarukan. Menyadari potensi dampak lingkungan dari penggunaan energi fosil, Perseroan secara proaktif menerapkan berbagai inisiatif penghematan energi di lingkungan kantor.

To date, the Company still relies on fossil fuel-based electricity supplied by PLN and has not yet utilized renewable energy. Recognizing the potential environmental impact of fossil fuel use, the Company proactively implements various energy-saving initiatives within its office environment.

Inisiatif Penghematan Listrik

- Optimalisasi penggunaan cahaya alami melalui pemanfaatan panel kaca di gedung perkantoran;
- Penggunaan lampu LED yang lebih hemat energi;
- Mematikan lampu dan AC di luar jam kerja atau saat ruangan tidak digunakan;
- Pengaturan penggunaan listrik dan AC hanya pada area kerja yang aktif saat lembur;
- Mencabut perangkat elektronik setelah digunakan serta pengaturan suhu ruangan agar tetap efisien

2025 329.750

Electricity-Saving Initiatives

- Optimizing the use of natural light through the use of glass panels in office buildings;
- Using more energy-efficient LED lights;
- Turning off lights and air conditioning outside of working hours or when rooms are not in use;
- Regulating the use of electricity and air conditioning only in active work areas during overtime;
- Unplugging electronic devices after use, and adjusting room temperatures to remain efficient.

2025 329.750

Keterangan Description	**Satuan** Unit	**2025**	**2024**	**2023**	**Penghematan atau manfaat yang dihasilkan** Savings or benefits generated
Penggunaan Energi Listrik Electrical Energy Usage	KWH GigaJoule (GJ)	329.750	337.158	277.996	7.408

Dengan penerapan langkah-langkah efisiensi tersebut secara konsisten, pada tahun 2025 Perseroan mencatat konsumsi energi listrik sebesar 329.750 menurun sebanyak 7.408 dibandingkan tahun 2024 sebesar 337.158 kWh

By consistently implementing these efficiency measures thoughout 2025, the Company recorded electricity consumption of 329,750 kWh, a decrease of 7,408 kWh compared to 337,158 kWh in 2024

Penggunaan Bahan Bakar Minyak (BBM)

Dalam mendukung kegiatan operasional, Perseroan memanfaatkan Bahan Bakar Minyak (BBM) untuk kendaraan dinas serta pengoperasian genset sebagai sumber energi cadangan apabila terjadi gangguan pasokan listrik di gedung perkantoran. Hingga saat ini, seluruh kendaraan operasional Perseroan masih menggunakan BBM jenis solar yang dipasok oleh Pertamina. Perseroan belum mengoperasikan kendaraan berbasis energi terbarukan maupun kendaraan listrik.

Sejalan dengan penggunaan energi listrik, konsumsi BBM juga berkontribusi terhadap peningkatan emisi karbon akibat pembakaran bahan bakar fosil. Menyadari potensi dampak lingkungan tersebut, Perseroan berupaya mengendalikan pemakaian BBM melalui

Fuel Oil Consumption (Fuel)

To support its operational activities, the Company uses Fuel Oil for company vehicles and to operate generators as a backup energy source in the event of power outages at office buildings. To date, all of the Company's operational vehicles still use diesel fuel supplied by Pertamina. The Company has not yet operated vehicles powered by renewable energy or electric vehicles.

In line with electricity consumption, fuel consumption also contributes to increased carbon emissions resulting from the combustion of fossil fuels. Recognizing the potential environmental impact, the Company strives to control fuel usage by regularly monitoring and recording fuel consumption to ensure that it

pemantauan dan pencatatan secara berkala untuk memastikan penggunaannya sesuai dengan kebutuhan operasional. Selain itu, Perseroan menerapkan sejumlah langkah mitigasi guna mengurangi risiko pemanasan global yang dapat timbul dari konsumsi energi yang tidak terkelola dengan baik.

is in line with operational needs. Additionally, the Company implements several mitigation measures to reduce the risk of global warming that may arise from poorly managed energy consumption.

Inisiatif Penghematan BBM

- Melakukan perawatan rutin terhadap seluruh kendaraan operasional;
- Melaksanakan uji emisi kendaraan secara berkala;
- Memastikan penggunaan jenis bahan bakar sesuai dengan spesifikasi kendaraan;
- Menekan kebutuhan mobilitas fisik dengan mengoptimalkan penggunaan telekonferensi.

2025 24.976

Fuel Conservation Initiatives

- Conducting routine maintenance on all operational vehicles;
- Conducting periodic vehicle emissions testing;
- Ensuring the use of fuel types that meet vehicle specifications;
- Reducing the need for physical mobility by optimizing the use of teleconferencing.

2025 24.976

Pada tahun 2025, konsumsi BBM solar dan bensin untuk operasional Kantor Pusat tercatat sebesar 24.976, turun dibandingkan tahun 2024 yang sebesar 25.474 liter, atau turun 498 liter. Total penggunaan energi listrik dan BBM pada tahun pelaporan setara dengan 2.086 Gigajoule.

In 2025, diesel and gasoline consumption for Head Office operations was recorded at 24,976 liters, down from 25,474 liters in 2024—a decrease of 498 liters. The total consumption of electricity and fuel in the reporting year was approximately 2,086 gigajoules.

Keterangan Description	**Satuan** Unit	**2025**	**2024**	**2023**	**Penghematan atau manfaat yang dihasilkan** Savings or benefits generated
Pemakaian BBM Fuel consumption	Liter Liters	24.976	25.474	21.329	498

Hemat Menggunakan Air Bersih E-04

Perseroan memanfaatkan air bersih yang disediakan oleh Perusahaan Daerah Air Minum (PDAM) untuk memenuhi kebutuhan domestik kantor, antara lain untuk pantry, toilet, musala, penyiraman tanaman, dan keperluan lainnya. Tingginya tingkat konsumsi air dalam aktivitas sehari-hari mendorong Perseroan untuk berperan aktif, bersama pelaku industri lainnya, dalam menjaga keberlanjutan sumber daya air bersih yang semakin terancam akibat pencemaran lingkungan dan dampak pemanasan global.

Conserving Clean Water

The Company utilizes clean water supplied by the Regional Water Company (PDAM) for domestic needs at the office, including for the pantry, restrooms, prayer room, watering plants, and other purposes. The high level of water consumption in daily activities has prompted the Company to take an active role, alongside other industry players, in safeguarding the sustainability of clean water resources, which are increasingly threatened by environmental pollution and the impacts of global warming.

Sejalan dengan penerapan prinsip *green banking operation*, Perseroan mengimbau seluruh karyawan untuk menerapkan perilaku hemat air di lingkungan kerja. Di sisi lain, pihak pengelola gedung juga melakukan langkah preventif dengan melakukan pemeriksaan instalasi air secara berkala serta segera melakukan perbaikan apabila ditemukan kebocoran atau kerusakan.

In line with the implementation of the green banking operation principle, the Company urges all employees to practice water conservation in the workplace. Meanwhile, the building management also takes preventive measures by conducting regular inspections of water systems and immediately carrying out repairs if leaks or damage are detected.

Selama periode pelaporan tahun 2025, volume penggunaan air di Kantor Pusat dan Kantor Cabang Utama (KCU) tercatat sebesar 1.667 m^3, turun dibandingkan tahun 2024 yang mencapai 1.798 m^3, atau turun sebesar 131 m^3.

During the 2025 reporting period, water usage at the Head Office and Main Branch Office (KCU) was recorded at 1,667 m^3, down from 1,798 m^3 in 2024, representing a decrease of 131 m^3.

Keterangan Description	**Satuan** Unit	**2025**	**2024**	**2023**	**Penghematan atau manfaat yang dihasilkan** Savings or benefits generated
Volume Air dari PDAM Water Volume from PDAM	m^3	1.667	1.798	1.625	131

Melalui penerapan inisiatif penghematan air, Perseroan tidak hanya berkontribusi dalam menjaga kelestarian sumber air bersih, tetapi juga dapat mengendalikan biaya operasional serta meningkatkan efektivitas pengelolaan anggaran.

Through the implementation of water conservation initiatives, the Company not only contributes to the preservation of clean water sources but also helps control operating costs and improve budget management effectiveness.

Upaya Pengurangan Emisi Energi

Sebagaimana telah diuraikan pada bagian sebelumnya, Perseroan memerlukan energi listrik dan BBM untuk mendukung aktivitas operasional perbankan sehari-hari. Untuk memastikan penggunaan energi tetap terkendali dari tahun ke tahun, Perseroan melakukan perhitungan Intensitas Konsumsi Energi (IKE) listrik secara manual dengan menggunakan rumus sebagai berikut:

Initiatives to Reduce Energy Emissions

As outlined in the previous section, the Company requires electricity and fuel to support its daily banking operations. To ensure energy consumption remains under control from year to year, the Company manually calculates the Electricity Energy Use Intensity (EUI) using the following formula:

$$\text{IKE} = \frac{\textbf{Pemakaian energi listrik} \mid \text{Electricity Consumption } \textbf{(KWh)}}{\textbf{Luas bangunan ber-AC} \mid \text{Air-conditioned building area}}$$

Dalam laporan ini, perhitungan IKE difokuskan pada data Kantor Pusat Perseroan. Berdasarkan perhitungan tersebut, diperoleh nilai IKE untuk tahun 2025 dan 2024 sebagaimana disajikan pada tabel berikut.

In this report, the EUI calculation focuses on data from the Company's Head Office. Based on this calculation, the EUI values for 2025 and 2024 are presented in the following table.

Tahun Year	Penggunaan Listrik Electricity Usage (kWh)	Luas Ruang Room Area	Rasio Intensitas Energi (kWh/m²/tahun) Energy Intensity Ratio (kWh/m²/year)	Kategori Category
2025	329.750	2.494 m²	132.21 ber-AC	Efisien | Efficient
2024	337.158	2.494 m²	135,18 ber-AC	Efisien | Efficient
2023	277.996	2.494 m²	111,46 ber-AC	Efisien | Efficient

Adapun klasifikasi tingkat penggunaan energi pada gedung perkantoran berdasarkan konsumsi energi spesifik disajikan sebagai berikut.

The classification of energy usage levels in office buildings based on specific energy consumption is presented as follows.

Kriteria Criteria	Ber-AC Air-conditioned		Tanpa AC Without AC	
	kWh/m²/bulan kWh/m²/month	kWh/m²/tahun* kWh/m²/year*	kWh/m²/bulan kWh/m²/month	kWh/m²/tahun* kWh/m²/year*
Sangat Efisien Highly Efficient	<8,5	<102	<3,4	<40,8
Efisien Efficient	8,5 – 14	102 – 168	3,4 – 5,6	40,8 – 67,2
Cukup Efisien Quite Efficient	14 – 18,5	168 – 222	5,6 – 7,4	67,2 – 88,8
Boros Wasteful	>18,5	>222	>7,4	88,8

Kriteria tersebut mengacu pada Peraturan Menteri Energi dan Sumber Daya Mineral Republik Indonesia Nomor 13 Tahun 2012 tentang Penghematan Pemakaian Tenaga Listrik.

The criteria above are based on Regulation of the Minister of Energy and Mineral Resources of the Republic of Indonesia No. 13 of 2012 on Electricity Conservation.

Pengolahan Limbah dan Sampah

Dalam kegiatan operasional sehari-hari, Perseroan menghasilkan limbah padat berupa peralatan elektronik bekas, lampu bekas, aki, perabotan, dan material lainnya. Sementara itu, limbah cair yang dihasilkan meliputi oli bekas dari kendaraan operasional dan genset, serta air limbah dari toilet, pantry, dan musala. Hingga saat ini, Perseroan belum memiliki kebijakan khusus terkait pengelolaan limbah, mengingat seluruh proses pengelolaan limbah tersebut dilakukan oleh pihak pengelola Gedung Treasury sebagai pengelola fasilitas gedung.

Sebagai institusi jasa keuangan yang menjalankan kegiatan operasional berbasis perkantoran, Perseroan tidak memiliki aktivitas operasional yang secara langsung berpotensi menimbulkan kejadian tumpahan bahan berbahaya dalam skala signifikan sebagaimana lazim terjadi pada sektor berbasis sumber daya alam atau manufaktur. Sepanjang tahun 2025, Bank tidak mencatat adanya kejadian tumpahan material yang berdampak signifikan terhadap lingkungan.

Waste Management

In its daily operations, the Company generates solid waste such as used electronic equipment, used light bulbs, batteries, furniture, and other materials. In addition, the Company also generates liquid waste, including used oil from operational vehicles and generators, as well as wastewater from restrooms, pantries, and prayer rooms. To date, the Company does not have a specific policy regarding waste management, considering that the entire waste management process is handled by the Treasury Building management as the facility manager.

As a financial services institution with office-based operations, the Company does not engage in activities that directly pose a significant risk of hazardous material spills, as is commonly associated with resource-based or manufacturing sectors. Throughout 2025, the Bank did not record any incidents of material spills that had a significant impact on the environment.

Perhitungan Emisi
Emission Calculation

Keterangan Description	Satuan Unit	2025	2024	2023
Pemakaian BBM (*Scope* 1) Fuel consumption (Scope 1)	Ton CO_2 eq	57,67	58,82	49,25
Penggunaan Energi Listrik (*Scope* 2) Electrical Energy Usage (Scope 2)		260,50	266,35	219,62
Total Emisi Emission Total		318,17	325,17	268,87
Pendapatan Income	Rp Juta Rp Million	3.145.192	3.612.292	3.847.049
Intensitas Emisi Emission Intensity	Ton CO_2 eq/Rp Juta Ton CO_2 eq/Rp Million	0,000101	0,000090	0,000070

Keanekaragaman Hayati

Kantor pusat Perseroan berlokasi di kawasan perkotaan sehingga tidak berada di dalam maupun berdekatan dengan kawasan lindung atau area konservasi yang memiliki tingkat keanekaragaman hayati tinggi. Dengan demikian, kegiatan operasional Perseroan tidak menimbulkan dampak signifikan terhadap kawasan konservasi beserta ekosistem di dalamnya.

Meski demikian, Perseroan tetap berupaya menjaga kualitas lingkungan sekitar melalui langkah-langkah sederhana, seperti menjaga kebersihan area kerja, menempatkan tanaman di dalam ruangan kantor, serta menerapkan efisiensi energi dalam aktivitas operasional.

Pengaduan Terkait Masalah Lingkungan Hidup

Perseroan saat ini belum memiliki saluran pengaduan khusus untuk menangani isu atau permasalahan lingkungan hidup yang timbul dari kegiatan operasional. Namun demikian, Perseroan telah mengintegrasikan aspek lingkungan hidup ke dalam setiap aktivitas perbankan yang dijalankan.

Sepanjang tahun 2025, Perseroan tidak menerima laporan atau pengaduan terkait ketidakpatuhan terhadap peraturan di bidang lingkungan hidup.

Biodiversity

The Company's headquarters is located in an urban area and is therefore neither located within nor adjacent to protected areas or conservation zones with high levels of biodiversity. Consequently, the Company's operational activities have no significant impact on conservation areas or their ecosystems.

Nevertheless, the Company remains committed to maintaining the quality of the surrounding environment through simple measures, such as keeping work areas clean, placing plants inside office spaces, and implementing energy efficiency in operational activities.

Complaints Regarding Environmental Issues

The Company currently has no specific complaint channel to address environmental issues or problems arising from its operational activities. However, the Company has integrated environmental considerations into every banking activity it performs.

Throughout 2025, the Company received no reports or complaints regarding non-compliance with environmental regulations.

Aspek Sosial
Social Aspects

Komitmen Perseroan dalam Menyediakan Layanan yang Setara bagi Nasabah

Perseroan menjunjung tinggi prinsip pelayanan yang adil, setara, dan inklusif bagi seluruh nasabah tanpa diskriminasi. Komitmen tersebut diwujudkan melalui penanganan setiap pengaduan dan keluhan nasabah secara objektif, transparan, dan sesuai dengan ketentuan yang berlaku. Untuk mendukung hal tersebut, Perseroan secara berkelanjutan menyelenggarakan program pengembangan kompetensi bagi karyawan, termasuk pelatihan *customer excellence* serta kegiatan *knowledge sharing* terkait produk dan layanan perbankan Perseroan, guna memastikan pemenuhan standar kompetensi dan profesionalisme insan perbankan.

Selain penguatan kapasitas internal, Perseroan memastikan bahwa seluruh informasi terkait produk dan/atau jasa disampaikan kepada nasabah secara akurat, jelas, dan dapat dipertanggungjawabkan. Penyampaian informasi tersebut dilakukan melalui berbagai saluran komunikasi resmi Perseroan, antara lain situs web, media sosial resmi BNC, serta layanan tatap muka di kantor pusat dan jaringan kantor cabang. Langkah ini merupakan bagian dari upaya Perseroan untuk menjaga prinsip transparansi serta memitigasi risiko penyampaian informasi yang tidak seimbang yang berpotensi merugikan nasabah maupun Perseroan.

Sebagai bank berbasis layanan digital, Perseroan secara berkelanjutan mengembangkan produk dan layanan perbankan yang inklusif melalui pemanfaatan inovasi teknologi. Penguatan kapabilitas layanan digital memungkinkan nasabah untuk melakukan transaksi perbankan secara daring kapan saja dan dari mana saja. Melalui model layanan tersebut, Perseroan dapat menjalankan fungsi intermediasi secara efektif sekaligus mendukung kebijakan Pemerintah dalam memperluas akses layanan perbankan kepada masyarakat tanpa keterbatasan wilayah geografis.

The Company's Commitment to Providing Equitable Services to Customers

The Company upholds the principles of fair, equitable, and inclusive service for all customers without discrimination. This commitment is realized through the objective, transparent, and legally compliant resolution of all customer complaints and grievances. To support its commitment, the Company continuously organizes competency development programs for employees, including customer excellence training and knowledge sharing activities regarding the Company's banking products and services aimed at ensuring the fulfillment of competency standards and professionalism among banking personnel.

Besides strengthening internal capacity, the Company ensures that all information regarding products and/or services is communicated to customers accurately, clearly, and accountably. The information is conveyed through various official communication channels of the Company, including the website, BNC's official social media, and in-person services at the headquarters and branch network. This initiative is part of the Company's efforts to uphold the principle of transparency and mitigate the risk of unbalanced information dissemination that could potentially harm both customers and the Company.

As a bank with digital services, the Company continuously develops inclusive banking products and services through the utilization of technological innovations. The reinforcement of digital service capabilities enables customers to conduct banking transactions online anytime and from anywhere. Through this service model, the Company can effectively perform its intermediary functions while supporting the Government's policy to expand access to banking services for the public without geographical limitations.

Perseroan hadir Bagi Karyawan

The Company is Available for Employees

Komitmen terhadap Kesetaraan Gender dan Kesempatan Kerja

Dalam menciptakan lingkungan kerja yang harmonis dan produktif, Perseroan menanamkan nilai-nilai inklusivitas sebagai fondasi budaya perusahaan. Seluruh karyawan diarahkan untuk saling menghormati perbedaan latar belakang, termasuk pendidikan, etnis, jenis kelamin, agama, maupun karakteristik lainnya, serta memandang keberagaman sebagai kekuatan yang saling melengkapi.

Sejalan dengan upaya membangun pola pikir yang setara, Perseroan secara berkelanjutan mendorong tercapainya keseimbangan gender, termasuk dengan membuka peluang yang lebih luas bagi karyawan perempuan untuk mengisi posisi strategis yang tersedia. Namun demikian, penempatan jabatan dan promosi tidak semata-mata didasarkan pada gender, melainkan mempertimbangkan kompetensi, kinerja, serta potensi individu. Hal ini menegaskan bahwa setiap karyawan, baik perempuan maupun laki-laki, memiliki kesempatan yang sama untuk berkontribusi hingga ke jenjang manajemen puncak.

Prinsip keberagaman telah diterapkan sejak tahap awal proses rekrutmen. Setiap keputusan penerimaan maupun penolakan kandidat dilakukan secara objektif berdasarkan hasil penilaian yang terukur, tanpa mempertimbangkan afiliasi kelompok, etnis, atau latar belakang tertentu. Pendekatan serupa juga diterapkan kepada karyawan internal, di mana Perseroan memastikan perlakuan yang adil dan setara serta kesempatan yang sama bagi seluruh karyawan untuk mengembangkan potensi diri dan meniti jenjang karier melalui program promosi yang telah ditetapkan. Program ini merupakan bentuk apresiasi Perseroan terhadap karyawan yang menunjukkan dedikasi dan kinerja optimal.

Commitment to Gender Equality and Equal Employment Opportunities

In creating a harmonious and productive work environment, the Company incorporates the values of inclusivity as the foundation of its corporate culture. All employees are encouraged to respect each other's diverse backgrounds, including education, ethnicity, gender, religion, and other characteristics, and to view diversity as a complementary strength.

In line with efforts to foster an equitable mindset, the Company continuously promotes gender balance, including by providing wider opportunities for female employees to occupy available strategic positions. However, job placements and promotions are not solely based on gender but also consider competence, performance, and individual potential. This emphasizes that every employee, whether female or male, has equal opportunities to advance to the top management level.

The principle of diversity has been applied from the very beginning of the recruitment process. Every decision to accept or reject a candidate is made objectively based on measurable assessment results, without considering group affiliations, ethnicity, or specific backgrounds. A similar approach is applied to internal employees, where the Company ensures fair and equal treatment as well as equal opportunities for all employees to develop their potential and advance their careers through established promotion programs. This program is an expression of the Company's appreciation for employees who demonstrate dedication and optimal performance.

S-01 Kesetaraan Gender
S-01 Gender Equality

Jumlah Level Level	Laki-laki Male		Perempuan Female	
	Jumlah Pegawai Total Employees	Persentase Pegawai Employee Percentage (%)	Jumlah Pegawai Total Employees	Persentase Pegawai Employee Percentage (%)
Entry-Level	359	73,57	381	85,62
Mid-Level	113	23,16	52	11,69
Senior-Level	13	2,66	12	2,70
Executive -Level	3	0,61	0	0,00
Total Pegawai Total of Employees	488	100,00	445	100,00

Hingga 31 Desember 2025, Perseroan mengelola 933 karyawan yang berasal dari beragam latar belakang pendidikan, golongan, usia, pengalaman kerja, jenis kelamin, serta ras, suku, dan agama. Komitmen terhadap prinsip inklusivitas tercermin dari tidak adanya laporan insiden maupun pengaduan terkait praktik diskriminasi yang diajukan oleh karyawan sepanjang tahun 2025.

As of December 31, 2025, the Company employed 933 employees from diverse educational backgrounds, job categories, ages, work experience levels, genders, as well as races, ethnicities, and religions. The Company's commitment to the principle of inclusivity is reflected in the absence of incidents or complaints regarding discriminatory practices filed by employees throughout 2025.

Tidak Mempekerjakan Tenaga Kerja Anak dan Menolak Praktik Kerja Paksa

No Child Labor and Prohibition of Forced Labor

Perseroan memastikan bahwa seluruh praktik ketenagakerjaan telah selaras dengan ketentuan peraturan perundang-undangan yang berlaku di Indonesia, antara lain Pasal 77 Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan juncto Undang-Undang No. 6 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang No. 2 Tahun 2022 tentang Cipta Kerja. Kepatuhan tersebut diwujudkan melalui kebijakan internal yang mengatur pengelolaan Sumber Daya Manusia (SDM), sebagaimana tercantum dalam Peraturan Perusahaan serta Kebijakan Rekrutmen dan Seleksi Karyawan terkait persyaratan umum calon karyawan.

The Company ensures that all labor practices are in compliance with applicable laws and regulations in Indonesia, including Article 77 of Law No. 13 of 2003 concerning Manpower juncto Government Regulation No. 6 of 2023 on the Enactment of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation. This compliance is realized through internal policies governing human resources (HR) management, as stipulated in the Company Regulations and the Employee Recruitment and Selection Policy regarding general requirements for prospective employees.

Sebagai bentuk penghormatan terhadap Hak Asasi Manusia (HAM), Perseroan menegaskan bahwa tidak pernah mempekerjakan tenaga kerja anak dalam bentuk apa pun. Ketentuan internal menetapkan batas usia minimum karyawan adalah 18 (delapan belas) tahun, dengan pengaturan jam kerja 8 (delapan) jam per hari

As a form of respect for Human Rights (HR), the Company emphasizes its commitment to never employ child labor in any form. Internal regulations set the minimum age for employees at 18 (eighteen) years, with working hours set at 8 (eight) hours per day or 40 (forty) hours per week for a 5-day workweek. Under certain conditions, if

atau 40 (empat puluh) jam per minggu untuk 5 (lima) hari kerja dalam satu minggu. Dalam kondisi tertentu, apabila karyawan dengan karakteristik jabatan dan tanggung jawab tertentu harus bekerja melebihi ketentuan jam kerja tersebut, Perseroan menyediakan kompensasi yang layak sesuai dengan ketentuan yang berlaku.

employees with specific job characteristics and responsibilities must work beyond these working hour limits, the Company provides appropriate compensation in accordance with applicable regulations.

Pemberian Remunerasi yang Kompetitif, Adil, dan Setara

Perseroan menerapkan kebijakan remunerasi yang adil dan non-diskriminatif bagi seluruh karyawan dengan mengacu pada peraturan perundang-undangan yang berlaku, antara lain Undang-Undang No. 13 Tahun 2003 tentang Ketenagakerjaan, Peraturan Pemerintah Pengganti Undang-Undang No. 2 Tahun 2022 tentang Cipta Kerja, serta Peraturan Pemerintah No. 36 Tahun 2021 tentang Kebijakan Pengupahan.

Berdasarkan ketentuan tersebut, Perseroan memastikan bahwa tingkat remunerasi bagi karyawan pada posisi terendah di seluruh wilayah operasional telah memenuhi, bahkan melampaui, ketentuan Upah Minimum Regional (UMR) yang berlaku. Kepatuhan ini ditunjukkan melalui perbandingan gaji karyawan dengan golongan terendah terhadap UMR sebagaimana disajikan pada tabel berikut.

Provision of Competitive, Fair, and Equitable Remuneration

The Company implements a fair and non-discriminatory remuneration policy for all employees in accordance with applicable laws and regulations, including Law No. 13 of 2003 concerning Manpower, Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation, and Government Regulation No. 36 of 2021 concerning Wage Policy.

Based on these provisions, the Company ensures that the remuneration levels for employees in the lowest positions across all operational regions have met, and even exceeded, the applicable Regional Minimum Wage (UMR) requirements. This compliance is demonstrated by comparing the salaries of lowest grade employees against the UMR, as presented in the following table.

Perbandingan Gaji Karyawan dengan Golongan Terendah terhadap UMR
Comparison of Lowest Grade Employee Salary Against Minimum Regional Wate

Wilayah Operasional Operational Area	**UMR Tahun 2025** Regional Minimum Wage of 2025	**Karyawan Golongan Terendah** Lowest Grade Employees
Kantor Pusat dan Kantor Cabang DKI Head Office and Branch Office – DKI Jakarta	5.531.680	5.531.680
Cabang Bandung Bandung Branch Office	4.482.914	4.550.000
Cabang Makassar Makassar Branch Office	3.657.527	3.900.000
Cabang Malang Malang Branch Office	3.507.693	3.507.693
Cabang Semarang Semarang Branch Office	3.454.827	4.000.000
Cabang Surabaya Surabaya Branch Office	5.284.267	5.300.000

Secara keseluruhan, kebijakan remunerasi Perseroan telah diterapkan secara konsisten dengan mempertimbangkan jenjang jabatan, masa kerja, serta hasil evaluasi kinerja masing-masing karyawan, sehingga tercipta sistem imbalan kerja yang adil, transparan, dan berkelanjutan.

Overall, the Company's remuneration policy has been consistently implemented by considering the position level, length of service, and performance evaluation results of each employee, thereby creating a fair, transparent, and sustainable compensation system.

Mewujudkan Lingkungan Kerja yang Aman dan Nyaman

Perseroan memandang karyawan sebagai aset strategis yang memiliki peran penting dalam mendorong pertumbuhan dan keberlanjutan usaha. Atas dasar tersebut, Perseroan berkomitmen untuk menyediakan lingkungan kerja yang aman, sehat, dan nyaman bagi seluruh karyawan. Upaya ini dilakukan untuk mencapai target nihil kecelakaan kerja *(zero accident)* serta mencegah terjadinya Penyakit Akibat Kerja (PAK).

Komitmen perlindungan keselamatan dan kesehatan kerja dituangkan secara formal dalam Kebijakan Kesehatan dan Keselamatan Kerja (K3) Perseroan. Kebijakan ini disusun dengan mengacu pada Peraturan Menteri Kesehatan Republik Indonesia Nomor 48 Tahun 2016 tentang Standar Keselamatan dan Kesehatan Kerja Perkantoran. Perseroan meyakini bahwa lingkungan kerja yang aman dan sehat akan mendorong karyawan bekerja secara lebih produktif, efisien, dan optimal tanpa rasa khawatir terhadap risiko keselamatan maupun kesehatan.

Implementasi K3 Tahun 2025

Untuk memastikan penerapan K3 berjalan efektif, Perseroan menyediakan berbagai fasilitas pendukung keselamatan kerja, antara lain Alat Pemadam Api Ringan (APAR), detektor asap, pompa diesel, kotak Pertolongan Pertama pada Kecelakaan (P3K), tangga darurat, serta perlengkapan keselamatan lainnya. Penyediaan sarana tersebut mengacu pada Peraturan Menteri Pekerjaan Umum No. 26/PRT/M/2008 tentang Persyaratan Teknis Sistem Proteksi Kebakaran pada Bangunan Gedung dan Lingkungan.

Selain ketersediaan fasilitas, Perseroan secara berkala melakukan pemeriksaan fungsi dan masa berlaku peralatan K3, serta menyelenggarakan sosialisasi K3 kepada seluruh karyawan. Upaya ini merupakan bagian dari penguatan budaya K3 yang secara konsisten dipromosikan, tidak hanya kepada karyawan tetapi juga kepada mitra kerja, agar seluruh pihak turut berperan aktif dalam menjaga keselamatan bersama di lingkungan kerja.

Creating a Safe and Comfortable Work Environment

The Company regards employees as strategic assets who play a vital role in driving business growth and sustainability. Therefore, the Company is committed to providing a safe, healthy, and comfortable work environment for all employees. These efforts are aimed at achieving a zero-accident target and preventing Occupational Diseases (PAK).

The Company's commitment to ensure the health and safety of its employees is formally outlined in its Occupational Health and Safety (OHS) Policy. This policy was formulated in accordance with Regulation of the Minister of Health of the Republic of Indonesia No. 48 of 2016 concerning Occupational Health and Safety Standards for Offices. The Company believes that a safe and healthy work environment will encourage employees to work more productively, efficiently, and optimally without worrying about safety or health risks.

OHS Implementation in 2025

To ensure effective implementation of OHS, the Company provides various facilities that support occupational safety, including Light Fire Extinguishers (APAR), smoke detectors, diesel pumps, First Aid Kits (P3K), emergency ladders, and other safety equipment. The provision of these facilities is in accordance with Ministry of Public Works Regulation No. 26/PRT/M/2008 regarding Technical Requirements for Fire Protection Systems in Buildings and the Surrounding Environment.

Besides providing these facilities, the Company regularly inspects the functionality and expiration dates of OHS equipment and organizes OHS awareness sessions for all employees. These efforts are part of a consistent effort to promote the OHS culture, not only to employees but also to business partners, so that all parties can play an active role in maintaining collective safety in the workplace.

Sebagian karyawan Perseroan juga tergabung dalam Tim *Emergency Response* yang bekerja sama dengan pengelola gedung. Dalam tim tersebut, terdapat perwakilan yang menjalankan peran sebagai *floor warden* dan *first aider*. Sepanjang tahun 2025, Perseroan telah melaksanakan sosialisasi K3 sebanyak 1 (satu) kali dan turut berpartisipasi dalam simulasi tanggap darurat gedung yang diselenggarakan pada 10 Desember 2025.

Kebijakan dan Program Kesehatan Karyawan

Selain memberikan kompensasi finansial, Perseroan menaruh perhatian serius terhadap kesehatan dan kesejahteraan karyawan melalui penyediaan berbagai fasilitas penunjang, antara lain:

1. Asuransi Kesehatan, yang mencakup perlindungan atas biaya medis, tindakan bedah, serta perawatan kesehatan karyawan.
2. BPJS Ketenagakerjaan, yang meliputi Jaminan Kecelakaan Kerja, Jaminan Kematian, Jaminan Hari Tua, dan Jaminan Pensiun.

Konsistensi dalam penerapan kebijakan K3 dan program kesehatan tersebut membuahkan hasil positif. Sepanjang tahun 2025, Perseroan tidak mencatat adanya kecelakaan kerja maupun penyakit akibat kerja. Capaian ini sekaligus menegaskan keberlanjutan kinerja keselamatan kerja yang telah dipertahankan Perseroan pada tahun-tahun sebelumnya.

Peningkatan Kualitas Karyawan melalui Program Pelatihan dan Pengembangan Kompetensi

Pengembangan kompetensi dan pendidikan karyawan merupakan agenda strategis yang dilaksanakan secara berkelanjutan setiap tahun. Program ini dirancang untuk meningkatkan standar kompetensi, memperkuat keterampilan, serta membangun daya saing karyawan agar mampu memberikan kontribusi terbaik bagi Perseroan. Dengan sumber daya manusia yang unggul, Perseroan optimistis dapat menjaga keberlangsungan usaha secara berkelanjutan.

Some of the Company's employees are also involved in the Emergency Response Team, which collaborates with the building management. Within this team, there are representatives who serve as floor wardens and first aiders. Throughout 2025, the Company has conducted OHS awareness sessions 1 (one) time and participated in a building emergency response drill held on December 10, 2025.

Employee Health Policies and Programs

In addition to providing financial compensation, the Company also pays close attention to employee health and well-being by providing various supporting facilities, including:

1. Health Insurance, which covers medical expenses, surgical procedures, and employee healthcare.
2. BPJS Ketenagakerjaan, which includes Work Accident Insurance, Life Insurance, Old Age Insurance, and Pension Insurance.

Consistency in implementing these OHS policies and health programs has yielded positive results. Throughout 2025, the Company recorded no occupational accidents or occupational diseases. This achievement further highlights the Company's sustained performance in occupational safety, which has been maintained in previous years.

Enhancing Employee Quality through Training and Competency Development Programs

Employee competency development and education are strategic initiatives implemented continuously every year. These programs are designed to elevate competency standards, strengthen skills, and build employee competitiveness so they can contribute their best to the Company. With a highly skilled workforce, the Company is confident in maintaining sustainable business operations.

Sepanjang tahun 2025, Perseroan menyelenggarakan 374 kegiatan pelatihan dan pengembangan kompetensi yang diikuti oleh 14.491 peserta, dengan total 33.304 jam pelatihan. Rata-rata jam pelatihan per karyawan tercatat sebesar 72.79 jam, meningkat 62 % dibandingkan tahun 2024 yang sebesar 45,22 jam per karyawan. Rincian rata-rata jam pelatihan berdasarkan jenis kelamin dan kategori jabatan disajikan pada tabel berikut.

Throughout 2025, the Company organized 374 training and competency development activities attended by 14,491 participants, totaling 33,304 training hours. The average training hours per employee were recorded at 72.79 hours, an increase of 62% compared to 2024, which was 45.22 hours per employee. Details of the average training hours by gender and job category are presented in the following table.

Uraian Description	**Jumlah Peserta Pelatihan** Total Training Participant			**Total Jam Pelatihan** Total Training Hours			**Rata-rata Jam Pelatihan Setiap Pekerja** Average Training Hours for Each Worker		
	2025	**2024**	**2023**	**2025**	**2024**	**2023**	**2025**	**2024**	**2023**
Keseluruhan Overall	913	516	998	33.304	53.812	39.058	72,79	90,48	39,13
Berdasarkan Jenis Kelamin **Based on Gender**									
Laki-Laki Male	477	612	512	18.204	27.281	20.420	38,16	44,58	39.88
Perempuan Female	436	578	486	15.100	26.531	18.368	34,63	45,9	36.40
Berdasarkan Level Jabatan **Based on Position**									
Manajemen Management	6	6	4	234	82	101,5	77,93	13,67	25,37
General Manager	187	218	40	11.557	14.997	2.738,50	61,80	68,79	68,46
Supervisor	123	162	146	5.738	10.297	4.258	46,65	63,56	29,16
Staff	597	804	654	15.775	28.436	28.441,50	26,42	35,57	43,48

Untuk mendukung pelaksanaan program pengembangan SDM sesuai rencana bisnis tahun 2025, Perseroan merealisasikan investasi pelatihan sebesar Rp5,8 miliar. Nilai ini mengalami penurunan sebesar Rp387 juta dibandingkan tahun 2024 yang mencapai Rp6,2 miliar, hal ini sejalan dengan strategi Bank dalam mengoptimalkan investasi pengembangan SDM tanpa mengurangi kualitas peningkatan kompetensi karyawan, melalui penguatan pendekatan pembelajaran mandiri (*self-learning*) dan pemanfaatan platform pembelajaran digital. Informasi lebih rinci terkait pelatihan dan pengembangan karyawan telah diungkapkan dalam Bab Sumber Daya Manusia halaman 105-133.

To support the implementation of the human resource development program as per the 2025 business plan, the Company allocated a training investment of IDR5.8 billion. This amount represents a decrease of IDR387 million compared to 2024, which stood at IDR6.2 billion. This allocation is in line with the Bank's strategy to optimize HR development investments without compromising the quality of employee competency development by strengthening the self-learning approach and leveraging digital learning platforms. Further details regarding employee training and development is disclosed in the Human Resources Chapter on page 105-133.

Pengelolaan Turnover Karyawan

Perputaran karyawan merupakan dinamika yang lazim terjadi dalam suatu organisasi. Namun demikian, tingkat *turnover* yang tinggi berpotensi mengganggu stabilitas produktivitas, menurunkan kualitas kinerja, serta menimbulkan beban biaya dalam jangka panjang. Oleh karena itu, Perseroan secara konsisten berupaya menciptakan lingkungan kerja yang kondusif dan harmonis melalui penerapan strategi pengelolaan SDM yang berorientasi pada kebutuhan karyawan, termasuk pelaksanaan program retensi untuk mempertahankan talenta terbaik.

Per 31 Desember 2025, tingkat *turnover* karyawan tercatat sebesar 49,20%, naik signifikan dibandingkan tahun 2024 yang mencapai 27,57%.

Perseroan mendefinisikan *turnover* sebagai kecenderungan karyawan untuk meninggalkan organisasi karena berbagai alasan, seperti mencari peluang karir yang lebih baik atau peningkatan pendapatan. Karyawan yang keluar karena pensiun atau meninggal dunia tidak diperhitungkan dalam perhitungan tingkat *turnover*.

Employee Turnover Management

Employee turnover is a common dynamic within an organization. However, high turnover rates have the potential to disrupt the stability of productivity, reduce performance quality, and incur long-term costs. Therefore, the Company consistently strives to create a conducive and harmonious work environment through the implementation of HR management strategies focused on employee needs, including the execution of retention programs to retain top talent.

As of December 31, 2025, the employee turnover rate stood at 49.20%, a significant increase compared to 2024, which was 27.57%.

The Company defines turnover as the tendency of employees to leave the organization due to various reasons, such as seeking better career opportunities or higher income. Employees who leave due to retirement or passing away are not included in the calculation of the turnover rate.

Penilaian Kinerja Karyawan

Perseroan melaksanakan proses penilaian kinerja karyawan secara terstruktur dan berkelanjutan sebagaimana diatur dalam Surat Edaran Direksi No. SK/024-2/SET/BNC/III/2025 tentang Prosedur Penilaian Kinerja Karyawan. Penilaian dilakukan dua kali dalam setahun, yakni pada pertengahan dan akhir tahun.

Dalam menetapkan indikator penilaian, Perseroan menerapkan prinsip objektivitas dan kesetaraan dengan tidak membedakan karyawan berdasarkan jenis kelamin maupun faktor lain yang tidak relevan. Evaluasi difokuskan pada aspek kompetensi, kinerja, dan potensi pengembangan masing-masing individu.

Hasil penilaian kinerja dimanfaatkan sebagai dasar pengambilan keputusan manajemen, khususnya dalam merancang program pelatihan dan pengembangan kompetensi yang tepat sasaran. Selain itu, proses ini juga berperan penting dalam memperkuat sistem suksesi kepemimpinan serta mendorong pengisian posisi strategis melalui promosi internal.

Secara umum, kebijakan peninjauan kinerja karyawan bertujuan untuk:

1. Memberikan ruang pengembangan sekaligus tantangan yang mendorong peningkatan pengetahuan, keterampilan, kompetensi, dan pengalaman karyawan agar siap menempuh jalur karier yang tersedia.
2. Menilai kapabilitas karyawan sebagai salah satu dasar dalam perencanaan dan pelaksanaan suksesi kepemimpinan.
3. Meminimalkan risiko penurunan produktivitas akibat kejenuhan kerja, sehingga karyawan tetap mampu menjaga kualitas dan kuantitas kinerja.
4. Mendukung kebutuhan Perseroan dalam membangun SDM yang berkelanjutan melalui pengembangan pengetahuan, pengalaman, dan keterampilan sepanjang perjalanan karier di Perseroan.

Employee Performance Assessment

The Company conducts a structured and continuous employee performance assessment process as stipulated in Board of Directors Circular Letter No. SK/024-2/SET/BNC/III/2025 regarding Employee Performance Assessment Procedures. Assessments are conducted twice a year, specifically in the middle and at the end of the year.

In establishing evaluation criteria, the Company applies the principles of objectivity and equity regardless of employees gender or other irrelevant factors. The evaluation focuses on the aspects of competence, performance, and potential development of each individual.

The performance assessment results are used as the basis for decision making by management, particularly in designing targeted training and competency development programs. Additionally, this process plays a crucial role in strengthening the leadership succession system and promoting the recruitment of strategic positions through internal promotions.

In general, the employee performance assessment policy aims to:

1. Provide opportunities for development and challenges that encourage the improvement of employees' knowledge, skills, competencies, and experience, preparing them to pursue available career paths.
2. Assessing employee capabilities as a foundation in planning and implementing leadership succession.
3. Minimizing the risk of productivity decline due to work fatigue, ensuring employees can maintain the quality and quantity of their performance.
4. Supporting the Company's needs in building sustainable human resources through the development of knowledge, experience, and skills throughout employees' careers at the Company.

Sepanjang tahun 2025, Perseroan mencatat 39 karyawan menerima promosi jabatan, 370 karyawan menjalani mutasi, serta tidak terdapat demosi jabatan.
Throughout 2025, the Company recorded 39 employees receiving promotions, 370 employees being transferred, and no demotions.



BNC Hadir Bagi Masyarakat dan Mendorong Inklusi Keuangan

BNC is Committed to Serve the Community and Promote Financial Inclusion

Dampak Operasional terhadap Masyarakat

Sebagai bank dengan layanan digital, Perseroan meyakini bahwa kegiatan usaha dan solusi keuangan yang dikembangkan memberikan nilai tambah dan manfaat nyata bagi masyarakat, khususnya nasabah yang terbiasa dengan layanan digital. Melalui aplikasi *"neobank dari BNC Digital"*, seluruh aktivitas perbankan termasuk pembukaan rekening dapat dilakukan secara mandiri melalui ponsel pintar tanpa harus datang ke kantor cabang. Selain meningkatkan kenyamanan dan keamanan bertransaksi, pendekatan digital ini turut berkontribusi dalam mengurangi jejak karbon dan dampak lingkungan.

Di luar fokus pada nasabah, Perseroan terus memperluas peran sosialnya dengan memastikan pertumbuhan bisnis berjalan selaras dengan peningkatan kesejahteraan masyarakat. Upaya tersebut diwujudkan melalui penciptaan lapangan kerja, pelaksanaan program Tanggung Jawab Sosial dan Lingkungan (TJSL), serta berbagai kegiatan literasi keuangan yang mendukung penguatan ekonomi digital nasional.

Perseroan juga menyadari bahwa operasional bank dengan layanan digital memiliki potensi risiko, antara lain ancaman keamanan siber yang dapat berdampak pada kerugian finansial, reputasi, dan tingkat kepercayaan publik. Untuk memitigasi risiko tersebut, Perseroan mengimplementasikan teknologi informasi terkini (*state-of-the-art*) yang andal serta didukung oleh sumber daya manusia yang memiliki kompetensi khusus di bidang keamanan siber *(cybersecurity)*.

Di sisi lain, Perseroan mencermati potensi kesenjangan digital yang dapat memperlebar ketimpangan sosial dan ekonomi, mengingat belum meratanya akses serta literasi digital di seluruh wilayah Indonesia. Menyikapi hal tersebut, Perseroan secara aktif menjalin kolaborasi dengan berbagai mitra untuk menyelenggarakan program literasi keuangan dan edukasi keamanan bertransaksi guna meningkatkan pemahaman masyarakat.

Operational Impact on the Community

As a bank with digital services, the Company believes that its business activities and financial solutions provide added value and tangible benefits to the community, particularly customers who are accustomed to digital services. Through the "neobank from BNC Digital" app, all banking activities—including account opening—can be conducted independently via smartphone without the need to visit a branch office. Aside from enhancing transaction convenience and security, this digital approach also contributes to reducing the carbon footprint and environmental impact.

Beyond its focus on customers, the Company continues to expand its social role by ensuring that business growth is in line with the improvement of community welfare. These efforts are realized through job creation, the implementation of Corporate Social and Environmental Responsibility (TJSL) programs, and various financial literacy activities that support the strengthening of the national digital economy.

The Company also recognizes that digital banking operations carry potential risks, including cybersecurity threats that could result in financial losses, reputational damage, and a decline in public trust. To mitigate these risks, the Company implements reliable state-of-the-art information technology that is supported by highly competent human resources specializing in cybersecurity.

On the other hand, the Company is mindful of the potential for a digital divide that could widen social and economic disparities, given the uneven distribution of access and digital literacy across all regions of Indonesia. In response, the Company actively collaborates with various partners to organize financial literacy and transaction security education programs to enhance public understanding.

Pada tahun 2025, Perseroan bekerja sama dengan sejumlah mitra, antara lain KTA Kilat, Pinjamwinwin, Adapundi, UangMe, Easycash, Gadai Emas Jatim, Gadai Emas Kaltim, Gadai Emas NTB, dan Gadai Mas Nusantara (Gadai Sulsel). Kolaborasi ini ditujukan untuk memperluas akses pembiayaan bagi masyarakat menengah ke bawah serta mendorong pertumbuhan ekonomi yang lebih inklusif.

Kontribusi Perseroan dalam Meningkatkan Literasi Keuangan

Dalam menjalankan perannya sebagai pelaku industri jasa keuangan, Perseroan berkomitmen menjadi agen perubahan yang mendukung agenda Pemerintah dalam meningkatkan inklusi keuangan nasional. Seluruh program edukasi dan literasi keuangan yang dijalankan mengacu pada RAKB Perseroan serta POJK No. 3 Tahun 2023 tentang Peningkatan Literasi dan Inklusi Keuangan di Sektor Jasa Keuangan Bagi Konsumen dan Masyarakat (POJK 3/2023) sebagai penyempurnaan dari POJK Nomor 76/POJK.07/2016.

Pemerintah Indonesia telah menetapkan target inklusi keuangan sebesar 90% pada tahun 2024, sebagaimana tercantum dalam Peraturan Presiden Nomor 114 Tahun 2020 tentang Strategi Nasional Keuangan Inklusif. Target ini menjadi bagian dari dukungan terhadap Program Bulan Inklusi Keuangan (BIK) dan Program Satu Rekening Satu Pelajar (KEJAR) yang diinisiasi oleh Otoritas Jasa Keuangan (OJK).

Sebagai bentuk kontribusi nyata, Perseroan terus memperluas akses layanan keuangan yang inklusif dan berkelanjutan. Sepanjang tahun 2025, Perseroan merealisasikan investasi sebesar Rp44.349.000 untuk penyelenggaraan berbagai kegiatan literasi keuangan, baik secara offline maupun online, yang dilaksanakan di berbagai lokasi dan diikuti oleh lebih dari 1.000 peserta.

In 2025, the Company collaborated with several partners, including KTA Kilat, Pinjamwinwin, Adapundi, UangMe, Easycash, Gadai Emas Jatim, Gadai Emas Kaltim, Gadai Emas NTB, and Gadai Mas Nusantara (Gadai Sulsel). This collaboration aims to expand access to financing for the lower-middle class and promote more inclusive economic growth.

The Company's Contribution in Improving Financial Literacy

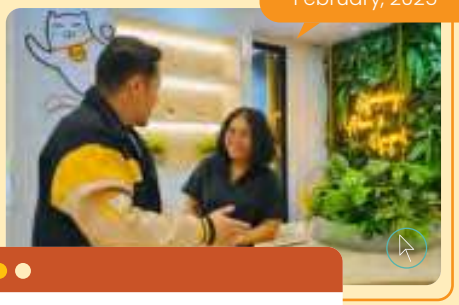
In fulfilling its role as a financial services industry practitioner, the Company is committed to being an agent of change that supports the Government's agenda in enhancing national financial inclusion. All of the Company's financial education and literacy programs are based on the Company's Annual Business Plan (RAKB) and OJK Regulation No. 3 of 2023 on Improving Financial Literacy and Inclusion in the Financial Services Sector for Consumers and the Public (OJK Regulation 3/2023), as an amendment to OJK Regulation No. 76/POJK.07/2016.

The Indonesian government has set a financial inclusion target of 90% by 2024, as stipulated in Presidential Regulation No. 114 of 2020 on the National Strategy for Financial Inclusion. This target is part of the support for the Financial Inclusion Month (BIK) Program and the One Account per Student (KEJAR) Program initiated by the Financial Services Authority (OJK).

As a tangible contribution, the Company continues to expand access to inclusive and sustainable financial services. Throughout 2025, the Company allocated an investment of IDR 44,349,000 to organize various financial literacy activities, both offline and online, held in various locations and attended by more than 1,000 participants.

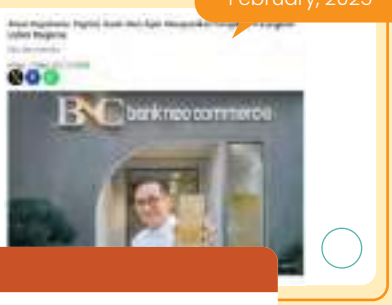
Kumpulan Kegiatan Literasi Keuangan Selama 2025 | Compilation of Financial Literacy Activities Throughout 2025

Februari 2025
February, 2025



Konten Media Publikasi *(Online)*
"Waspada Penipuan *Email Phishing & Malware*"
Media Publication Content (Online)
"Beware of Email Phishing & Malware Scams"

Februari 2025
February, 2025



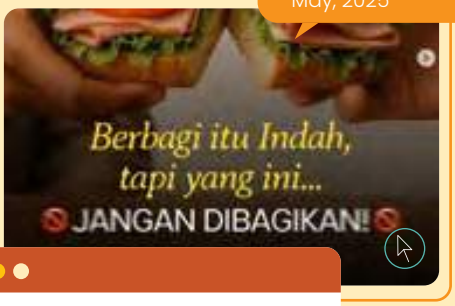
Konten Media Publikasi *(Online)*
"Pentingnya *Cyber Hygiene*"
Media Publication Content (Online)
"The Importance of Cyber Hygiene"

Mei 2025
May, 2025



Konten Media Publikasi *(Online)*
"Mempersiapkan Biaya Pendidikan"
Media Publication Content (Online)
"Planning for Education Costs"

Mei 2025
May, 2025



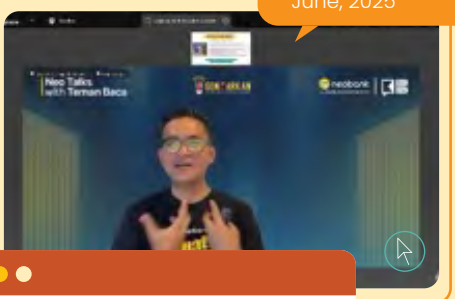
Konten Media Publikasi *(Online)*
"Keamanan Data Pribadi"
Media Publication Content (Online)
"Personal Data Security"

Juni 2025
June, 2025



Konten Media Publikasi *(Online)*
"Cermat Mengajukan Pinjaman"
Media Publication Content (Online)
"Borrowing with Caution"

Juni 2025
June, 2025



Sosialisasi Daring *(Online)*
"Manisnya Self Reward, Pahitnya Dompet Kering: Cerdas Atur Uang di Era FOMO"
"The Sweetness of Self-Reward, the Bitterness of an Empty Wallet: Smart Money Management in the Age of FOMO"

Juli 2025
July, 2025



Konten Media Publikasi *(Online)*
"Persiapan Dana Pensiun"
Media Publication Content (Online)
"Preparing Pension Funds"

Oktober 2025
October, 2025



Konten Media Publikasi *(Online)*
"Cara Atur Pengeluaran Buat Nabung"
Media Publication Content (Online)
"How to Manage Your Expenses to Save Money"

Agustus 2025
August, 2025



Konten Media Publikasi *(Online)*
"Menyambut Hari Indonesia Menabung, Bank Neo Commerce Bagikan Tips Bijak Menabung"
"Celebrating Indonesia's Saving Day, Bank Neo Commerce Shares Smart Saving Tips"

Oktober 2025
October, 2025



Sosialisasi *(Hybrid)*
"Tantangan Mengelola Keuangan di Era Digital dan Mawas Terhadap Penipuan Digital"
"The Challenges of Managing Finances in the Digital Age and Staying Vigilant Against Digital Fraud"

Oktober 2025
October, 2025



Sosialisasi Daring *(Online)*
"Tantangan Mengelola Keuangan di Era Digital dan Mawas Terhadap Penipuan Digital"
"The Challenges of Managing Finances in the Digital Age and Staying Vigilant Against Digital Fraud"

Oktober 2025
October, 2025



Sosialisasi Daring *(Online)*
"Tantangan Mengelola Keuangan di Era Digital dan Mawas Terhadap Penipuan Digital"
"The Challenges of Managing Finances in the Digital Age and Staying Vigilant Against Digital Fraud"

Kegiatan Tanggung Jawab Sosial dan Lingkungan Tahun 2025

Sejalan dengan target RAKB 2025 Perseroan telah melaksanakan sejumlah program TJSL sepanjang tahun 2025 sebagaimana dirangkum dalam tabel berikut:

Social and Environmental Responsibility Activities for 2025

In line with the RAKB 2025 targets, the Company has implemented a number of TJSL programs throughout 2025, as summarized in the following table:

Program Program	**Penjelasan** Explanation	**Waktu Pelaksanaan** Implementation Time	**Dana yang Digunakan** Funds Used
Sosialisasi Edukasi Literasi Keuangan bersama Komunitas Kumpulbaca Socialization of Financial Literacy Education with the Kumpulbaca Community	Menggandeng Komunitas, BNC memberikan edukasi untuk meningkatkan literasi keuangan masyarakat agar dapat mengelola keuangan dengan baik (dalam hal ini BNC memberikan edukasi terkait fenomena *Self Reward* yang marak di generasi muda saat ini. Hal ini berdampak pada cara generasi muda dalam mengelola keuangan) In partnership with the community, BNC provides financial literacy education to help people manage their finances effectively (in this case, BNC offers education on the "Self-Reward" trend that is prevalent among today's youth. This trend influences how young people manage their finances)	22 Juni 2025 June 22, 2025	Rp5.751.400
Sosialisasi Edukasi Literasi Keuangan bersama Mahasiswa Fakultas Ekonomi & Bisnis Universitas Trunojoyo Madura Socialization of Financial Literacy Education with Students from the Faculty of Economics and Business at Trunojoyo University of Madura	Literasi keuangan diadakan di salah satu universitas negeri yang berlokasi di Bangkalan, Madura, yang merupakan salah satu wilayah 3T (terluar, terdepan, tertinggal) sesuai dengan arahan dari OJK dan BI, dengan mahasiswa/i menjadi target penerima literasi keuangan. The financial literacy program was held at a state university located in Bangkalan, Madura, which is one of the 3T regions (remote, frontier, and underdeveloped), as directed by the OJK and BI, with university students as the target audience for the financial literacy program.	28 Oktober 2025 October 28, 2025	Rp26.388.500

Penanganan Pengaduan Masyarakat

Perseroan berkomitmen menjalankan praktik bisnis yang bertanggung jawab dengan menyediakan saluran pengaduan yang aman, mudah diakses, dan dikelola secara profesional. Sebagai bank berbasis digital, Perseroan memfasilitasi penyampaian pengaduan masyarakat dan nasabah melalui kanal daring berikut:

Public Complaint Handling

The Company is committed to practicing responsible business by providing a secure, easily accessible, and professionally managed complaint channel. As a Bank with digital services, the Company facilitates the submission of complaints from the public and customers through the following online channels:

Email Customer Care

Media Sosial | Social Media

- Bank Neo Commerce
- @bankneocommerce

Live Chat

- Neobank App

Call Center

- 1500 190

E-mail

- customercare@bankneo.co.id



Seluruh laporan pengaduan ditangani melalui sistem yang mengacu pada ketentuan *Service Level Agreement* (SLA) internal Perseroan. Proses penanganan dan penyelesaian pengaduan dimonitor secara rutin oleh Direktur Bisnis setiap bulan serta dilaporkan kepada regulator sesuai ketentuan yang berlaku.

All complaint reports are handled through a system that refers to the Company's internal Service Level Agreement (SLA). The complaint handling and resolution process is routinely monitored by the Business Director every month and reported to regulators in accordance with applicable regulations.

BNC Hadir untuk Memberikan Pelayanan Terbaik bagi Nasabah

BNC is Committed to Delivering the Best Service to Customers

Inovasi dan Pengembangan Produk dan/atau Layanan Keuangan Berkelanjutan

Sejalan dengan komitmen Perseroan dalam mendukung penerapan Keuangan Berkelanjutan, BNC terus melakukan inovasi dan pengembangan produk serta layanan yang mengintegrasikan aspek lingkungan, sosial, dan tata kelola (ESG) dalam kegiatan operasional maupun penawaran produk dan layanan kepada nasabah. Dengan model bisnis yang berfokus pada pemanfaatan platform digital, Bank memiliki peluang untuk mengembangkan layanan keuangan berkelanjutan secara lebih efisien dan inklusif. Strategi ini diyakini sebagai fondasi penting dalam menjaga keberlanjutan usaha jangka panjang. Berangkat dari pemahaman tersebut, Perseroan secara konsisten menghadirkan pengembangan produk dan layanan keuangan yang inovatif guna mempercepat pertumbuhan bisnis sekaligus memperkuat ekosistem layanan digital yang berorientasi pada kenyamanan nasabah.

Implementasi prinsip Keuangan Berkelanjutan diwujudkan melalui berbagai inisiatif nyata, salah satunya melalui peluncuran produk tabungan Neo Green pada pertengahan tahun 2025. Melalui produk ini, Perseroan mengajak nasabah untuk berpartisipasi dalam upaya pelestarian lingkungan dengan menabung sekaligus berbagi, dimana sebagian alokasi bunga dari tabungan tersebut disalurkan untuk mendukung kegiatan yang berkaitan dengan konservasi dan kelestarian alam.

Dalam pelaksanaannya, Bank bekerja sama dengan World Wide Fund for Nature (WWF) sebagai mitra strategis dalam menyalurkan dana yang terkumpul dari program ini. Kolaborasi tersebut diharapkan dapat memastikan bahwa dana yang dialokasikan melalui produk Neo Green memberikan dampak positif yang nyata terhadap upaya perlindungan lingkungan dan keberlanjutan ekosistem.

Salah satu bentuk implementasi aksi keberlanjutan juga diwujudkan melalui peran Perseroan sebagai Agen Penjual Efek Reksa Dana (APERD) dengan memasarkan produk reksa dana berbasis *Environmental, Social, and Governance* (ESG)

Innovation and Development of Sustainable Financial Products and/or Services

In line with the Company's commitment to supporting the implementation of Sustainable Finance, BNC continues to innovate and develop products and services that integrate environmental, social, and governance (ESG) aspects into both operational activities, as well as the products and services offered to customers. With a business model that focused on leveraging digital platforms, the Bank has the opportunity to develop sustainable financial services more efficiently and inclusively. This strategy is believed to be a crucial foundationto maintain long-term business sustainability. Based on this understanding, the Company consistently introduces innovative financial products and services to accelerate business growth while strengthening a digital service ecosystem centered on customer convenience.

The implementation of Sustainable Finance principles is realized through various concrete initiatives, one of which is the launch of the Neo Green savings product in mid-2025. Through this product, the Company invites customers to participate in environmental conservation efforts by saving while giving back, where a portion of the interest from these savings is channeled to support activities related to nature conservation and sustainability.

In practice, the Bank collaborates with the World Wide Fund for Nature (WWF) as a strategic partner in channeling funds collected from this program. This collaboration is expected to ensure that funds allocated through the Neo Green product have a tangible positive impact on environmental protection and ecosystem sustainability.

The Company's commitment to sustainability is further demonstrated through its role as a Mutual Fund Sales Agent (APERD) by marketing Environmental, Social, and Governance (ESG)-based mutual fund products from its investment

milik Rekanan Manajer Investasi Eastspring Investment Indonesia. Melalui peran ini, Bank turut memperluas akses nasabah terhadap instrumen investasi yang tidak hanya memberikan potensi imbal hasil, tetapi juga memperhatikan prinsip keberlanjutan dalam pengelolaan investasinya.

Selain itu, Perseroan terus melengkapi ragam layanan bagi segmen nasabah korporasi, individu, hingga UMKM, seiring meningkatnya minat masyarakat terhadap layanan perbankan BNC. Pada tahun 2025, Perseroan mencatat pertumbuhan jumlah nasabah dan peningkatan aktivitas transaksi pada layanan digital, dengan peningkatan jumlah nasabah sebesar 15% serta peningkatan nasabah yang memiliki layanan digital Corporate Internet Banking sebesar 31% serta peningkatan nilai transaksi mencapai 134% dibandingkan dengan tahun 2024. Peningkatan tersebut mencerminkan kepercayaan nasabah terhadap layanan perbankan digital BNC yang semakin andal, aman, dan mudah diakses.

Bagi nasabah individu dan pelaku UMKM, Perseroan memperkenalkan dua layanan baru pada paruh pertama tahun berjalan, yaitu *Wealth Management* dan *Neo Business Loan*. Layanan *Wealth Management* memungkinkan nasabah individu mengakses produk reksa dana secara langsung melalui aplikasi neobank serta bancassurance. Sementara itu, hingga akhir Desember 2025, *Neo Business Loan* telah menyelesaikan uji coba terbatas dan diharapkan dapat diluncurkan secara resmi sehingga dapat dimanfaatkan oleh debitur UMKM sebagai sarana pengelolaan transaksi keuangan dan operasional usaha mereka.

Sebagai bank berbasis digital, Perseroan terus menyesuaikan pengembangan produk dan layanannya dengan perkembangan teknologi terkini. Pendekatan ini dijalankan untuk memastikan setiap solusi keuangan yang dihadirkan relevan dengan kebutuhan nasabah. Melalui inovasi yang berkelanjutan, Perseroan berharap kehadirannya dapat memberikan nilai tambah bagi seluruh pemangku kepentingan serta berkontribusi dalam mendorong pertumbuhan ekonomi nasional, khususnya melalui perluasan akses layanan perbankan digital bagi UMKM.

management partner, Eastspring Investment Indonesia. Through this role, the Bank helps expand customer access to investment instruments that not only offer potential returns but also comply with sustainability principles in their investment management.

Furthermore, the Company continues to expand its range of services for corporate, individual, and MSME customer segments, in line with the growing public interest in BNC's banking services. In 2025, the Company recorded growth in the number of customers and increased digital transaction activity, with a 15% increase in the number of customers, a 31% increase in customers using the Corporate Internet Banking digital service, and a 134% increase in transaction value compared to 2024. This growth reflects customers' confidence in BNC's digital banking services, which are becoming increasingly reliable, secure, and accessible.

For individual and MSME customers, the Company introduced two new services in the first half of the current year: Wealth Management and Neo Business Loan. The Wealth Management service allows individual customers to access mutual fund products directly through the neobank app and bancassurance. In the meantime, by the end of December 2025, the Neo Business Loan had completed a limited trial and is expected to be officially launched so that MSME customers can take advantage of it as an instrument to manage their financial transactions and business operations.

As a bank with digital services, the Company continuously aligns the development of its products and services with the latest technological developments. This approach aims to ensure that every financial solution offered remains relevant to customer needs. Through continuous innovation, the Company hopes its presence can provide added value to all stakeholders and contribute to driving national economic growth, particularly through expanding access to digital banking services for MSMEs.

Evaluasi Keamanan Produk dan/atau Jasa

Sebagai bank dengan model bisnis yang beroperasi dalam industri jasa keuangan yang sangat teregulasi, Perseroan senantiasa menerapkan prinsip kehati-hatian (*prudential banking*) serta praktik perbankan yang bertanggung jawab dalam seluruh kegiatan usaha. Kepatuhan terhadap ketentuan peraturan perundang-undangan yang berlaku, termasuk dalam proses pengembangan dan pemasaran produk serta layanan perbankan, merupakan komitmen utama Perseroan. Dalam hal ini, Perseroan mengacu pada Pedoman Standar Ringkasan Informasi Produk dan Layanan Sektor Jasa Keuangan yang diterbitkan oleh Otoritas Jasa Keuangan sebagai upaya untuk menjamin kesetaraan informasi serta perlindungan bagi nasabah.

Pengelolaan produk dan/atau jasa keuangan dilaksanakan oleh masing-masing Divisi sesuai dengan fungsi, tugas, dan tanggung jawabnya. Secara struktural, seluruh Divisi tersebut berada di bawah koordinasi dan pertanggungjawaban Direktur Bisnis. Setiap produk dan/atau layanan baru yang akan diluncurkan wajib melalui serangkaian tahapan evaluasi dan pengujian, termasuk kajian risiko oleh Divisi Manajemen Risiko, uji kepatuhan oleh Divisi Kepatuhan, serta pengawasan dan persetujuan dari Direktur Kepatuhan. Proses tersebut memastikan bahwa seluruh produk dan layanan telah ditelaah secara menyeluruh dan komprehensif sebelum ditawarkan kepada masyarakat.

Perseroan memastikan bahwa seluruh produk dan/atau jasa keuangan yang diluncurkan telah memperoleh persetujuan dari otoritas yang berwenang, yaitu Bank Indonesia dan/atau Otoritas Jasa Keuangan. Selain itu, setiap pengembangan produk juga melalui tahapan *user acceptance test* serta proses sertifikasi guna menjamin kualitas, keamanan, dan keandalan layanan bagi nasabah.

Sejalan dengan ketentuan Peraturan Otoritas Jasa Keuangan Nomor 22 Tahun 2023 tentang Perlindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan, Perseroan telah menyusun dan menyediakan ringkasan informasi produk dan layanan sebagai sarana peningkatan transparansi serta mitigasi potensi risiko dalam kegiatan pemasaran. Seluruh informasi terkait produk dan/atau jasa keuangan Perseroan dapat diakses melalui situs resmi Perseroan di https://www.bankneocommerce.co.id/. Selain

Product and/or Service Security Evaluation

As a bank operating in a highly regulated financial services industry, the Company consistently applies the principles of prudential banking and responsible banking practices in all business activities. Compliance with applicable laws and regulations, including in the development and marketing of banking products and services, is the Company's primary commitment. In this regard, the Company refers to the Financial Services Authority's Standard Guidelines for Product and Service Information Summaries in the Financial Services Sector as an effort to ensure information transparency and customer protection.

The management of financial products and/or services is carried out by each Division in accordance with its respective functions, duties, and responsibilities. Structurally, all Divisions operate under the coordination and accountability of the Business Director. Every new product and/or service that will be launched must undergo a series of evaluation and testing, including a risk assessment by the Risk Management Division, a compliance test by the Compliance Division, as well as oversight and approval from the Compliance Director. This process ensures that all products and services have been thoroughly and comprehensively reviewed before being offered to the public.

The Company ensures that all of its financial products and/or services have obtained approval from the relevant authorities, i.e., Bank Indonesia and/or the Financial Services Authority. Additionally, every product development must undergo a user acceptance test and a certification process to ensure the quality, security, and reliability of services for customers.

In accordance with the provisions of Financial Services Authority Regulation No. 22 of 2023 on Consumer and Public Protection in the Financial Services Sector, the Company has prepared and provided summaries of product and service information in order to increase transparency and mitigate potential risks in marketing activities. All information regarding the Company's financial products and/or services can be accessed through the Company's official website at https://www.bankneocommerce.co.id/. Furthermore,

itu, Perseroan juga memanfaatkan media sosial sebagai saluran komunikasi resmi untuk memperluas sosialisasi dan edukasi produk keuangan kepada masyarakat.

Dampak Produk dan/atau Jasa

Hingga saat ini, Perseroan belum melakukan asesmen terhadap produk dan/atau jasa yang dimiliki dengan mengacu pada Kriteria Kegiatan Usaha Berkelanjutan (KKUB) sebagaimana diatur dalam POJK Keuangan Berkelanjutan. Kondisi ini disebabkan oleh fokus portofolio produk Perseroan yang masih didominasi oleh segmen pembiayaan konsumtif (kredit konsumer).

Saluran Pengaduan Nasabah

Perseroan menempatkan nasabah sebagai pusat dari seluruh aktivitas usaha yang dijalankan, mengingat peran strategis nasabah dalam menjaga keberlangsungan bisnis jangka panjang. Oleh karena itu, Perseroan menyediakan berbagai saluran pengaduan agar nasabah dapat menyampaikan keluhan atau laporan terkait produk, layanan, keamanan data, maupun dugaan ketidakpatuhan terhadap peraturan.

Pengaduan dapat disampaikan melalui:

the Company utilizes social media as an official communication channel to expand public outreach and education regarding financial products.

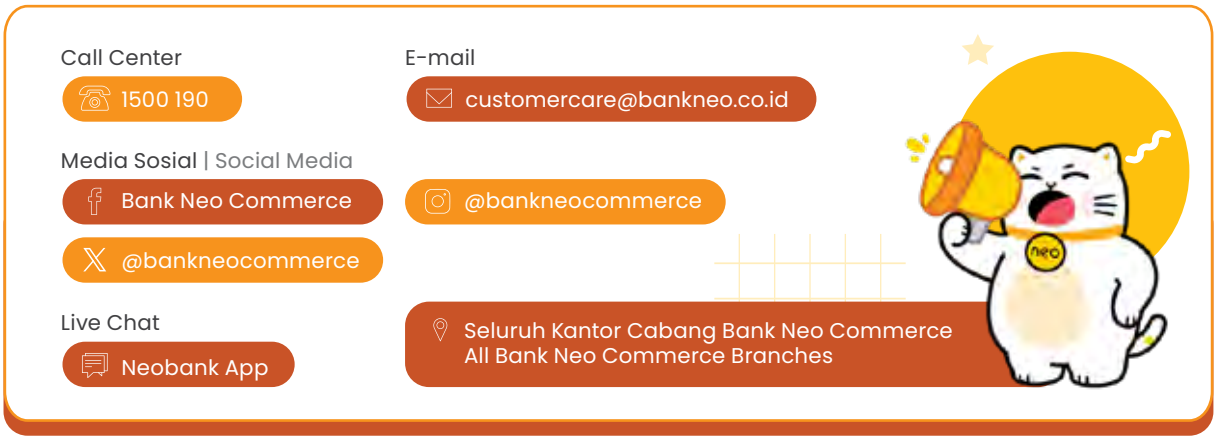
Impact of Products and/or Services

To date, the Company has not conducted an assessment of its products and/or services in accordance with the Sustainable Business Activity Criteria (KKUB) as stipulated in the POJK on Sustainable Finance. This is due to the Company's product portfolio, which is still dominated by the consumer financing segment (consumer credit).

Customer Complaint Channels

The Company places customers at the center of all business activities, given their strategic role in ensuring long-term business sustainability. Therefore, the Company provides various complaint channels so that customers can submit complaints or reports regarding products, services, data security, or suspected non-compliance with regulations.

Complaints can be submitted via:



Selain melalui saluran tersebut, nasabah juga dapat menyampaikan pengaduan secara langsung dengan mendatangi kantor cabang Perseroan. Setiap pengaduan yang diterima akan diverifikasi dan ditindaklanjuti oleh unit kerja terkait.

Perseroan berkomitmen untuk terus meningkatkan kualitas pengalaman nasabah dengan menindaklanjuti seluruh pengaduan sesuai dengan *Service Level Agreement* (SLA) yang

In addition to these channels, customers may also submit complaints in person by visiting the Company's branches. Every complaint received will be verified and addressed by the relevant department.

The Company is committed to continuously improving the quality of the customer experience by addressing all complaints in accordance with the applicable Service Level Agreement (SLA). In accordance with regulatory requirements, verbal

berlaku. Mengacu pada ketentuan regulator, pengaduan lisan diselesaikan paling lambat 5 (lima) hari kerja, sedangkan pengaduan tertulis diselesaikan paling lambat 10 (sepuluh) hari kerja. Dalam kondisi tertentu, jangka waktu penyelesaian dapat diperpanjang hingga maksimal 10 (sepuluh) hari kerja berikutnya.

Rekapitulasi pengaduan nasabah selama tiga tahun terakhir beserta status penyelesaiannya disajikan pada tabel berikut:

complaints must be resolved within a maximum of 5 (five) business days, while written complaints must be resolved within a maximum of 10 (ten) business days. Under certain conditions, the resolution period may be extended for up to an additional 10 (ten) business days.

Recapitulation of customer complaints over the past three years along with their resolution status is presented in the following table:

Uraian Description	**Jumlah Keluhan Diterima** Total Complaints Received		**Status** Status
	Sudah diselesaikan Has been settled	**Dalam proses penyelesaian** In progress	
2025	17.997	197	Selesai 99%
2024	15.885	375	Selesai 98%
2023	22.453	326	Selesai 99%

Survei Kepuasan Nasabah

Perseroan berkomitmen untuk menghadirkan layanan yang unggul dengan mengedepankan prinsip *service excellence* dan *customer engagement*. Upaya menjaga loyalitas nasabah serta memastikan kualitas produk dan layanan keuangan diwujudkan melalui pelaksanaan survei kepuasan nasabah secara berkala.

Pada tahun 2025, hasil survei menunjukkan tingkat kepuasan nasabah sebesar 98,65%, menurun 1,15% dibandingkan tahun sebelumnya sebanyak 99,8%. Rincian hasil survei kepuasan nasabah tahun 2025 disajikan pada tabel berikut:

Customer Satisfaction Survey

The Company is committed to delivering exceptional service by prioritizing service excellence and customer engagement. The Company's efforts to maintain customer loyalty and ensure the quality of its financial products and services are realized through the regular customer satisfaction surveys.

In 2025, survey results showed a customer satisfaction rate of 98.65%, a decrease of 1.15% compared to the previous year's rate of 99.8%. Details of the 2025 customer satisfaction survey results are presented in the following table:

Uraian Description	**Koresponden** Correspondent	**Puas** Satisfied	**Netral** Neutral	**Tidak Puas** Not satisfied	**Persentase Kepuasan Satisfaction** Percentage
Online Survey Branch Online Survey Branch	4.444	4.435	5	4	99,8%
Online Survei Customer Care Online Customer Care Survey	4.848	4.732	0	116	97,6%
Total	9.292	9.167	5	20	98,7%

Hasil survei tersebut menjadi dasar bagi Perseroan dalam merumuskan langkah-langkah perbaikan berkelanjutan, sehingga Perseroan dapat terus memberikan layanan prima serta menghadirkan produk dan jasa keuangan yang berkualitas dan relevan dengan kebutuhan nasabah.

The survey results are used as a reference for the Company in formulating continuous improvement measures, enabling the Company to continue providing excellent service and offering high-quality financial products and services that are relevant to customer needs.

Perlindungan terhadap Data Nasabah

Di tengah pesatnya digitalisasi dan perkembangan teknologi informasi di sektor perbankan, Perseroan menyadari pentingnya menjaga kerahasiaan dan keamanan data pribadi nasabah dari berbagai risiko siber. Oleh karena itu, Perseroan menerapkan pendekatan kehati-hatian (*prudential approach*) dalam menjalankan operasional bisnis, termasuk melalui investasi pada sistem teknologi informasi yang andal untuk mendeteksi dan mencegah potensi kebocoran data. Perseroan juga mengimplementasikan *data governance framework* sesuai dengan praktik terbaik ISO 27001:2013 tentang *Information Security Management Systems* (ISMS).

Komitmen terhadap perlindungan data nasabah telah diatur dalam Kebijakan Perlindungan Konsumen dan Masyarakat, yang sejalan dengan Undang-Undang Nomor 10 Tahun 1998 tentang Perubahan atas Undang-Undang Nomor 7 Tahun 1992 tentang Perbankan serta POJK No. 22 Tahun 2023 tentang Pelindungan Konsumen dan Masyarakat di Sektor Jasa Keuangan.

Sepanjang tahun 2025, Perseroan tidak mencatat adanya insiden pelanggaran privasi maupun kehilangan data nasabah. Selain itu, tidak terdapat sanksi administratif maupun denda finansial yang dikenakan kepada Perseroan terkait pelanggaran atas kerahasiaan data nasabah.

Tanggapan atas Umpan Balik Laporan Tahun Sebelumnya

Sepanjang tahun 2025 tidak terdapat umpan balik yang diterima atas Laporan Tahunan dan Laporan Keberlanjutan 2024. Meskipun demikian, Perseroan tetap berkomitmen untuk senantiasa meningkatkan kualitas kinerja, tata kelola, serta transparansi pengungkapan informasi dalam Laporan Keberlanjutan melalui penyajian informasi yang relevan dan komprehensif untuk memenuhi kebutuhan para pemangku kepentingan. Laporan Keberlanjutan ini belum dilakukan proses verifikasi ekternal (pihak independen), namun Bank telah melakukan proses verifikasi internal untuk memastikan data yang tersaji telah sesuai dan layak untuk dipublikasikan.

Protection of Customer Data

Amidst the rapid digitalization and development of information technology in the banking sector, the Company recognizes the importance of maintaining the confidentiality and security of customers' personal data against various cyber risks. Therefore, the Company adopts a prudential approach in conducting its business operations, including through investments in reliable information technology systems to detect and prevent potential data breaches. The Company also implements a data governance framework in accordance with the best practices of ISO 27001:2013 on Information Security Management Systems (ISMS).

The commitment to protecting customer data is stipulated in the Consumer and Public Protection Policy, which aligns with Law No. 10 of 1998 concerning Amendments to Law No. 7 of 1992 on Banking as well as OJK Regulation No. 22 of 2023 concerning Consumer and Public Protection in the Financial Services Sector.

Throughout 2025, the Company recorded no incidents of privacy breaches or loss of customer data. Furthermore, no administrative sanctions or financial fines were imposed on the Company regarding violations of customer data confidentiality.

Response to Feedback on the Previous Year's Report

There was no feedback received regarding the 2024 Annual Report and Sustainability Report throughout 2025. Nevertheless, the Company remains committed to continuously improving the quality of performance, governance, and transparency of information disclosure in the Sustainability Report by presenting relevant and comprehensive information to fulfill the needs of stakeholders. This Sustainability Report has not been verified by an independent external party. Nevertheless, the Bank has performed internal verification to ensure the accuracy and reliability of the disclosed data.

Lembar Umpan Balik

Feedback Sheet

Laporan Keberlanjutan 2025 PT Bank Neo Commerce Tbk disajikan sebagai satu kesatuan dengan Laporan Tahunan 2025. Daftar pengungkapan sesuai Peraturan OJK Nomor 51/POJK.03/2017 tentang Penerapan Keuangan Berkelanjutan bagi Lembaga Jasa Keuangan, Emiten, dan Perusahaan Publik dapat dilihat pada halaman 533.

Dalam rangka meningkatkan kualitas pelaporan yang lebih baik pada tahun mendatang, kami akan sangat berterima kasih jika para pemangku kepentingan dapat memberikan kritik dan saran setelah membaca Laporan ini dengan cara mengisi Lembar Umpan Balik berikut ini.

Nama: .....
Name

Institusi/Perusahaan: .....
Institution/Company

E-mail: .....
Phone/HP

Telp/HP: .....
E-mail

Klasifikasi Pemangku Kepentingan
(Pilih satu dan beri tanda sesuai jawaban)
Stakeholder Classification
(Please choose one and mark according to the answer)

- ☐ **Pemegang Saham**
  Shareholder
- ☐ **Mitra Kerja**
  Business Partner
- ☐ **Regulator**
  Regulator
- ☐ **Nasabah**
  Client
- ☐ **Masyarakat**
  Community
- ☐ **Karyawan**
  Employee
- ☐ **Lain-lain**
  Others (.....)

The 2025 Sustainability Report of PT Bank Neo Commerce Tbk is presented as a single document with the 2025 Annual Report. The list of disclosures in accordance with OJK Regulation No. 51/POJK.03/2017 on the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies can be viewed on page 533.

In order to improve the quality of our reporting in the coming year, we would greatly appreciate it if stakeholders could provide feedback and suggestions after reading this Report by filling out the following Feedback Sheet.

Klasifikasi Pemangku Kepentingan
(Pilih satu dan beri tanda sesuai jawaban)
Stakeholder Classification
(Please choose one and mark according to the answer)

	Ya Yes	Tidak No
Laporan ini telah memberikan informasi mengenai PT Bank Neo Commerce Tbk yang bermanfaat bagi Anda This report has provided information about PT Bank Neo Commerce Tbk that is useful for you		
Laporan ini sudah cukup lengkap dan jelas dalam menggambarkan kinerja Bank terkait pembangunan berkelanjutan This report is quite complete and clear in describing the Bank's performance related to sustainable development		
Bentuk, tampilan dan penyajian laporan mudah dipahami The form, display and presentation of the report are easy to understand		

Umpan Balik dapat dikirimkan kembali kepada kami melalui E-mail atau Pos ke alamat:
Feedback can be submitted back to us via E-mail or Post to the following address:

Tel.
(62 21) 2709 4950, 2709 4951

E-mail
corsec@bankneo.co.id

Website
www.bankneocommerce.co.id

Treasury Tower Lantai 60, Kawasan District 8
LOT. 28, Jl. Jend Sudirman Kav. 52-53 Senayan,
Kebayoran Baru, Jakarta Selatan 12190



Referensi Peraturan POJK No. 51/POJK.03/2017 & Surat Edaran OJK No. 16/SEOJK.04/2021 (G.4)

Reference to POJK Regulation No. 51/POJK.03/2017 & OJK Circular No. 16/SEOJK.04/2021 (G.4)

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PT Bank Neo Commerce 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 the Indonesian language.

PT BANK NEO COMMERCE Tbk
LAPORAN KEUANGAN
TANGGAL 31 DESEMBER 2025
DAN UNTUK TAHUN YANG BERAKHIR
PADA TANGGAL TERSEBUT
BESERTA LAPORAN AUDITOR INDEPENDEN

PT BANK NEO COMMERCE Tbk
FINANCIAL STATEMENTS
AS OF DECEMBER 31, 2025
AND FOR THE YEAR THEN ENDED
WITH INDEPENDENT AUDITOR'S REPORT

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bank neo commerce

SURAT PERNYATAAN DEWAN DIREKSI TENTANG TANGGUNG JAWAB ATAS LAPORAN KEUANGAN TANGGAL 31 DESEMBER 2025 DAN UNTUK TAHUN YANG BERAKHIR PADA TANGGAL TERSEBUT PT BANK NEO COMMERCE 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 NEO COMMERCE TBK

Saya, yang bertanda tangan di bawah ini :

I, the undersigned below:

Nama	Eri Budiono	*Name*
Alamat kantor	Treasury Tower Lt. 60 Jl. Jendral Sudirman Kav. 52-53, Senayan Kebayoran Baru, Jakarta Selatan	*Office address*
Alamat domisili atau sesuai KTP	Jl. Gedung Pinang Blok PS-24 RT 014/RW 016, Kel. Pondok Pinang, Kec. Kebayoran Lama, Jakarta Selatan	*Domicile address or address according to ID*
Nomor telepon	(021) 27094950	*Telephone number*
Jabatan	Direktur Utama/*President Director*	*Title*

menyatakan bahwa:

declare that:

1. Direksi bertanggung jawab atas penyusunan dan penyajian laporan keuangan PT Bank Neo Commerce Tbk;

2. Laporan keuangan PT Bank Neo Commerce Tbk telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia;

3. a. Semua informasi dalam laporan keuangan PT Bank Neo Commerce Tbk telah dimuat secara lengkap dan benar; dan

   b. Laporan keuangan PT Bank Neo Commerce Tbk tidak mengandung informasi atau fakta material yang tidak benar, dan tidak menghilangkan informasi atau fakta material;

4. Direksi bertanggung jawab atas sistem pengendalian internal dalam PT Bank Neo Commerce Tbk.

1. *The Board of Directors is responsible for the preparation and presentation of the financial statements of PT Bank Neo Commerce Tbk;*

2. *The financial statements of PT Bank Neo Commerce Tbk have been prepared and presented in accordance with Indonesian Financial Accounting Standards;*

3. a. *All information in the financial statements of PT Bank Neo Commerce Tbk have been fully disclosed in a complete and truthful manner; and*

   b. *The financial statements of PT Bank Neo Commerce Tbk do not contain any incorrect information or material fact, nor do they omit any information or material fact;*

4. *The Board of Directors is responsible for the internal control system of PT Bank Neo Commerce Tbk.*

Demikian pernyataan ini dibuat dengan sebenarnya.

This statement is made truthfully.

Jakarta, 30 Maret/*March 30,* 2026
Atas nama dan mewakili Direksi / *For and on behalf of the Board of Directors of*
PT Bank Neo Commerce Tbk



Eri Budiono
Direktur Utama / *President Director*

Shape the future with confidence

KAP Purwanto Susanti dan Surja

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The original report included herein is in the Indonesian language.

Laporan Auditor Independen

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026

Pemegang Saham, Dewan Komisaris, dan Direksi

PT Bank Neo Commerce Tbk

Opini

Kami telah mengaudit laporan keuangan PT Bank Neo Commerce 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.

Basis opini

Kami melaksanakan audit kami berdasarkan Standar Audit yang ditetapkan oleh Institut Akuntan Publik Indonesia ("IAPI"). Tanggung jawab kami menurut standar tersebut diuraikan lebih lanjut dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami. Kami independen terhadap Bank berdasarkan ketentuan etika yang relevan dalam audit kami atas laporan keuangan di Indonesia, dan kami telah memenuhi tanggung jawab etika lainnya berdasarkan ketentuan tersebut. Kami yakin bahwa bukti audit yang telah kami peroleh adalah cukup dan tepat untuk menyediakan suatu basis bagi opini kami.

Independent Auditor's Report

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026

The Shareholders and the Boards of Commissioners and Directors
PT Bank Neo Commerce Tbk

Opinion

We have audited the accompanying financial statements of PT Bank Neo Commerce Tbk. (the "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 for opinion

We conducted our audit 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 audit 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.

KAP Purwanto Susanti dan Surja
Registered Public Accountants KMK No. 69/MK/SK/2025
A member firm of Ernst & Young Global Limited

The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Hal audit utama

Hal audit utama adalah hal-hal yang, menurut pertimbangan profesional kami, merupakan hal yang paling signifikan dalam audit kami atas laporan keuangan 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 hal audit utama di bawah ini, penjelasan kami tentang bagaimana audit kami merespons hal tersebut disampaikan dalam konteks tersebut.

Kami telah memenuhi tanggung jawab yang diuraikan dalam paragraf Tanggung Jawab Auditor terhadap Audit atas Laporan Keuangan pada laporan kami, termasuk sehubungan dengan hal 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.

Cadangan kerugian penurunan nilai atas kredit yang diberikan

Penjelasan atas hal audit utama:

Pada tanggal 31 Desember 2025, saldo kredit yang diberikan adalah sebesar Rp7.182.580 juta dan cadangan kerugian penurunan nilai atas kredit yang diberikan adalah sebesar Rp515.056 juta. Mengacu pada ikhtisar kebijakan akuntansi yang material pada Catatan 3, penggunaan pertimbangan, estimasi dan asumsi akuntansi yang signifikan pada Catatan 4 dan pengungkapan kredit yang diberikan dengan cadangan kerugian penurunan nilai serta manajemen risiko kredit pada Catatan 11 dan 39 pada laporan keuangan.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Key audit matter

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. Such key audit matters were addressed in the context of our audit of the financial statements taken as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on such key audit matters. For the key audit matter below, our description of how our audit addressed such key audit matter is provided in such context.

We have fulfilled the responsibilities described in the Auditor's Responsibilities for the Audit of the Financial Statements paragraph of our report, including in relation to the key audit matter communicated below. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement 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.

Allowance for impairment losses of loans

Description of the key audit matter:

As of December 31, 2025, the balance of loans amounted to Rp7,182,580 million and allowance for impairment losses amounted to Rp515,056 million. Refer to the summary of material accounting policies in Note 3, use of significant accounting judgements, estimates and assumptions in Note 4 and the disclosure of loans with allowance for impairment losses and credit risk management in Notes 11 and 39 to the financial statements.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Hal audit Utama (lanjutan)

Cadangan kerugian penurunan nilai atas kredit yang diberikan (lanjutan)

Penjelasan atas hal audit utama (lanjutan):

Kami fokus pada area ini karena nilai tercatat atas kredit yang diberikan dan cadangan kerugian penurunan nilai terkait adalah signifikan terhadap laporan keuangan. Selain itu, penentuan cadangan kerugian penurunan nilai memerlukan pertimbangan dan memiliki ketidakpastian estimasi yang mencakup penentuan model untuk menghitung cadangan kerugian penurunan nilai, identifikasi eksposur kredit yang mengalami penurunan kualitas kredit yang signifikan, dan penentuan asumsi yang digunakan dalam model perhitungan cadangan kerugian penurunan nilai (untuk eksposur yang dinilai secara individu atau kolektif), termasuk faktor ekonomi makro masa depan.

Respons audit:

Prosedur audit yang kami lakukan termasuk pengujian pengendalian utama atas pemberian kredit, segmentasi, penilaian kualitas kredit internal secara reguler, pencatatan dan pengawasan kredit yang diberikan. Kami juga memeroleh pemahaman dan menilai tentang metodologi pengukuran penurunan nilai, pemeliharaan dan validasi model cadangan kerugian penurunan nilai, data masukan, dasar dan asumsi yang digunakan oleh Bank dalam menghitung cadangan penurunan nilai.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Key audit matter (continued)

Allowance for impairment losses of loans (continued)

Description of the key audit matter (continued):

We focused on this area because the carrying value of loans and the related allowances are significant to the financial statements. In addition, determination of allowance for impairment losses requires judgement and is subject to estimation uncertainty which includes determining the model to calculate allowance for impairment losses requires judgement and is subject to estimation uncertainty which includes determining the model to calculate allowance for impairment losses, identification of credit exposures with significant deterioration in credit quality, and determining assumptions used in allowances for impairment losses calculation models (for exposures assessed on an individual or collective basis), including forward-looking macroeconomics factors.

Audit response:

Our audit procedures included the assessment of key controls over the loan origination, segmentation, regular internal credit quality assessments, recording and monitoring of the loans. We also obtained understanding on the impairment measurement methodologies, maintenance and validation of allowance for impairment loss models, inputs, bases and assumptions used by the Bank in calculating the allowance for impairment losses.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Hal audit Utama (lanjutan)

Cadangan kerugian penurunan nilai atas kredit yang diberikan (lanjutan)

Respons audit (lanjutan):

Kami melakukan penilaian dan pengujian terhadap kewajaran dari tiga tahapan (staging) kualitas kredit portofolio sesuai dengan kriteria yang disusun oleh Bank. Kami melakukan penilaian dan menguji kembali model cadangan kerugian penurunan nilai termasuk data masukan, model design, dan model kinerja untuk seluruh portfolio kredit. Kami juga menguji apakah pengalaman historis mewakili keadaan saat ini serta kerugian terkini yang terjadi dalam portfolio dan mengevaluasi kewajaran atas penyesuaian asumsi masa depan, analisis faktor ekonomi makro, dan beberapa skenario probabilitas tertimbang.

Sehubungan dengan cadangan penurunan nilai yang dinilai secara individual, kami menguji seluruh populasi kredit yang diberikan untuk mengevaluasi apakah identifikasi dilakukan secara tepat waktu oleh Bank terhadap eksposur dengan penurunan kualitas kredit yang signifikan atau yang telah mengalami penurunan nilai.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Key audit matter (continued)

Allowance for impairment losses of loans (continued)

Audit response (continued):

We assessed and tested reasonableness of the three-stage transfer criteria applied by the Bank. We assessed and tested the Bank's impairment models, including model inputs, model design and model performance for all loan portfolios. We also tested whether historical experience is representative of current circumstances and of the recent losses incurred in the portfolios and assessed the reasonableness of forward-looking adjustments, macroeconomic factor analysis and probability-weighted multiple scenarios.

With respect to individually assessed allowance for impairment losses, we tested whole population of loans to evaluate the timely identification by the Bank of exposures with significant deterioration in credit quality or which have been impaired.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Hal audit Utama (lanjutan)

Cadangan kerugian penurunan nilai atas kredit yang diberikan (lanjutan)

Respons audit (lanjutan):

Untuk kasus-kasus di mana penurunan nilai telah diidentifikasi, kami menilai asumsi Bank atas arus kas masa depan yang akan diterima, termasuk nilai jaminan yang dapat direalisasikan berdasarkan informasi pasar yang tersedia atau penilaian yang dilakukan oleh penilai independen, sebagai pakar manajemen. Kami memeriksa keakuratan perhitungan nilai cadangan kerugian penurunan nilai, dengan menghitung kembali cadangan kerugian penurunan nilai yang dinilai secara kolektif untuk seluruh portofolio dan menghitung ulang cadangan kerugian penurunan nilai yang dinilai secara individual untuk populasi kredit yang diberikan, kami juga menilai apakah pengungkapan di laporan keuangan Bank cukup dan secara memadai mencerminkan eksposur Bank terhadap risiko kredit dan melibatkan pakar internal kami untuk membantu kami dalam melakukan prosedur-prosedur di atas ketika keahlian spesifik mereka diperlukan.

Informasi lain

Manajemen bertanggung jawab atas informasi lain. Informasi lain terdiri dari informasi yang tercantum dalam Laporan Tahunan PT Bank Neo Commerce Tbk ("Laporan Tahunan") selain laporan keuangan terlampir dan laporan auditor independen kami. Laporan Tahunan diharapkan akan tersedia bagi kami setelah tanggal laporan auditor independen ini.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Key audit matter (continued)

Allowance for impairment losses of loans (continued)

Audit response (continued):

For cases where impairment has been identified, we assessed the Bank's assumptions on the expected future cash flows, including the value of realizable collateral based on available market information or valuation prepared by independent valuer, as management expert. We checked the accuracy of the calculation of allowance for impairment losses amount by recalculating the collectively assessed impairment losses for the entire portfolio and recalculated the individual impairment losses for the population of loans. We also assessed whether the financial statements disclosures are adequately and appropriately reflecting the Bank's exposure to credit risk and involved our internal experts in the performance of the above procedures where their specific expertise was required.

Other information

Management is responsible for the other information. Other information comprises the information included in the Annual Report PT Bank Neo Commerce Tbk ("The Annual Report") other than the accompanying financial statements and our independent auditor's report thereon. The Annual Report is expected to be made available to us after the date of this independent auditor's report.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Informasi lain (lanjutan)

Opini kami atas laporan keuangan terlampir tidak mencakup Laporan Tahunan, dan oleh karena itu, kami tidak menyatakan bentuk keyakinan apapun atas Laporan Tahunan tersebut.

Sehubungan dengan audit kami atas laporan keuangan terlampir, tanggung jawab kami adalah untuk membaca Laporan Tahunan ketika tersedia dan, dalam melaksanakannya, mempertimbangkan apakah Laporan Tahunan mengandung ketidakkonsistensian material dengan laporan keuangan terlampir atau pemahaman yang kami peroleh selama audit, atau mengandung kesalahan penyajian material.

Ketika kami membaca Laporan Tahunan, jika kami menyimpulkan bahwa terdapat suatu kesalahan penyajian material di dalamnya, kami diharuskan untuk mengomunikasikan hal tersebut kepada pihak yang bertanggung jawab atas tata kelola dan melakukan tindakan yang tepat berdasarkan peraturan perundang-undangan yang berlaku.

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan

Manajemen bertanggung jawab atas penyusunan dan penyajian wajar laporan keuangan tersebut sesuai dengan Standar Akuntansi Keuangan di Indonesia, dan atas pengendalian internal yang dianggap perlu oleh manajemen untuk memungkinkan penyusunan laporan keuangan yang bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Other information (continued)

Our opinion on the accompanying financial statements does not cover the Annual Report, and accordingly, we do not express any form of assurance on the Annual Report.

In connection with our audit of the accompanying financial statements, our responsibility is to read the Annual Report when it becomes available and, in doing so, consider whether the Annual Report is materially inconsistent with the accompanying financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated.

When we read the Annual Report, if we conclude that there is a material misstatement therein, we are required to communicate the matter to those charged with governance and take appropriate actions based on the applicable laws and regulations.

Responsibilities of management and those charged with governance for the financial statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Indonesian Financial Accounting Standards, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Tanggung jawab manajemen dan pihak yang bertanggung jawab atas tata kelola terhadap laporan keuangan (lanjutan)

Dalam penyusunan laporan keuangan, manajemen bertanggung jawab untuk menilai kemampuan Bank dalam mempertahankan kelangsungan usahanya, mengungkapkan, sesuai dengan kondisinya, hal-hal yang berkaitan dengan kelangsungan usaha, dan menggunakan basis akuntansi kelangsungan usaha, kecuali manajemen memiliki intensi untuk melikuidasi Bank atau menghentikan operasi, atau tidak memiliki alternatif yang realistis selain melaksanakannya.

Pihak yang bertanggung jawab atas tata kelola bertanggung jawab untuk mengawasi proses pelaporan keuangan Bank.

Tanggung jawab auditor terhadap audit atas laporan keuangan

Tujuan kami adalah untuk memeroleh keyakinan memadai tentang apakah laporan keuangan secara keseluruhan bebas dari kesalahan penyajian material, baik yang disebabkan oleh kecurangan maupun kesalahan, dan untuk menerbitkan laporan auditor independen yang mencakup opini kami. Keyakinan memadai merupakan suatu tingkat keyakinan tinggi, namun bukan merupakan suatu jaminan bahwa audit yang dilaksanakan berdasarkan Standar Audit yang ditetapkan oleh IAPI akan selalu mendeteksi kesalahan penyajian material ketika hal tersebut ada. Kesalahan penyajian dapat disebabkan oleh kecurangan maupun kesalahan dan dianggap material jika, baik secara individual maupun agregat, dapat diekspektasikan secara wajar akan memengaruhi keputusan ekonomi yang diambil oleh pengguna berdasarkan laporan keuangan tersebut.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Responsibilities of management and those charged with governance for the financial statements (continued)

In preparing the financial statements, management is responsible for assessing the Bank's ability to continue as a going concern, disclosing, as applicable, matters related to going concern, and using the going concern basis of accounting, unless management either intends to liquidate the Bank or to cease its operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Bank's financial reporting process.

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements taken as a whole are free from material misstatement, whether due to fraud or error, and to issue an independent auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Standards on Auditing established by the IICPA will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga:

- 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.

- Memeroleh suatu pemahaman tentang pengendalian internal yang relevan dengan audit untuk mendesain prosedur audit yang tepat sesuai dengan kondisinya, tetapi bukan untuk tujuan menyatakan opini atas keefektivitasan pengendalian internal Bank.

- Mengevaluasi ketepatan kebijakan akuntansi yang digunakan serta kewajaran estimasi akuntansi dan pengungkapan terkait yang dibuat oleh manajemen.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- 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.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.

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Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (lanjutan)

Tanggung jawab auditor terhadap audit atas laporan keuangan (lanjutan)

Sebagai bagian dari suatu audit berdasarkan Standar Audit yang ditetapkan oleh IAPI, kami menerapkan pertimbangan profesional dan mempertahankan skeptisisme profesional selama audit. Kami juga: (lanjutan)

- Menyimpulkan ketepatan penggunaan basis akuntansi kelangsungan usaha oleh manajemen dan, berdasarkan bukti audit yang diperoleh, apakah terdapat suatu ketidakpastian material yang terkait dengan peristiwa atau kondisi yang dapat menyebabkan keraguan signifikan atas kemampuan Bank untuk mempertahankan kelangsungan usahanya. Ketika kami menyimpulkan bahwa terdapat suatu ketidakpastian material, kami diharuskan untuk menarik perhatian dalam laporan auditor independen kami ke pengungkapan terkait dalam laporan keuangan atau, jika pengungkapan tersebut tidak memadai, memodifikasi opini kami. Kesimpulan kami didasarkan pada bukti audit yang diperoleh hingga tanggal laporan auditor independen kami. Namun, peristiwa atau kondisi masa depan dapat menyebabkan Bank tidak dapat mempertahankan kelangsungan usaha.

- Mengevaluasi penyajian, struktur, dan isi laporan keuangan secara keseluruhan, termasuk pengungkapannya, dan apakah laporan keuangan mencerminkan transaksi dan peristiwa yang mendasarinya dengan suatu cara yang mencapai penyajian wajar.

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.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/AU.1/07/0242-5/1/III/2026 (continued)

Auditor's responsibilities for the audit of the financial statements (continued)

As part of an audit in accordance with Standards on Auditing established by the IICPA, we exercise professional judgment and maintain professional skepticism throughout the audit. We also: (continued)

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our independent auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusion is based on the audit evidence obtained up to the date of our independent auditor's report. However, future events or conditions may cause the Bank to cease to continue as a going concern.

- Evaluate the overall presentation, structure, and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

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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The original report included herein is in the Indonesian language.

Laporan Auditor Independen (lanjutan)

Laporan No. 00345/2.1505/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.

Independent Auditor's Report (continued)

Report No. 00345/2.1505/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 matters. We describe such key audit matters in our independent auditor's report unless laws or regulations preclude public disclosure about such key audit matters or when, in extremely rare circumstances, we determine that a key audit matter should not be communicated in our independent auditor's report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

KAP Purwanto Susanti dan Surja

Yovita

Registrasi Akuntan Publik No. AP.0242/*Public Accountant Registration No. AP.0242*

30 Maret 2026/*March 30, 2026*

PT BANK NEO COMMERCE Tbk
LAPORAN POSISI KEUANGAN
Tanggal 31 Desember 2025
(Disajikan dalam Jutaan Rupiah, Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF FINANCIAL POSITION
As of December 31, 2025
(Expressed in Millions of Rupiah, Unless Otherwise Stated)

	31 Desember 2025/ ***December 31, 2025***	**Catatan/** ***Notes***	**31 Desember 2024/** ***December 31, 2024***	
ASET				***ASSETS***
Kas	9.760	3e,5,38,39	12.133	*Cash*
Giro pada Bank Indonesia	1.144.566	3e,3f,6, 38,39	1.274.118	*Current accounts with Bank Indonesia*
Giro pada bank lain	54.595	3e,3f,7, 38,39	80.789	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.863.391	3e,3g,8, 38,39	156.104	*Placements with Bank Indonesia and other banks*
Efek-efek	7.566.676	3e,3h,9, 38,39	4.681.952	*Marketable securities*
Dikurangi: Cadangan kerugian penurunan nilai	(2)	3e,4,9	-	*Less: Allowance for impairment losses*
Jumlah efek-efek - bersih	7.566.674		4.681.952	*Total marketable securities - net*
Efek-efek yang dibeli dengan janji dijual kembali	651.407	3e,3i,10, 38,39	1.878.331	*Securities purchased under agreements to resell*
Kredit yang diberikan		3c,3e,3j,3s 11,38,39		*Loans*
Pihak berelasi	22.030	36	22.624	*Related parties*
Pihak ketiga	7.160.550		8.799.522	*Third parties*
	7.182.580		8.822.146	
Dikurangi: Cadangan kerugian penurunan nilai	(515.056)	3e,4,11	(635.245)	*Less: Allowance for impairment losses*
Jumlah kredit yang diberikan - bersih	6.667.524		8.186.901	*Total loans - net*
Aset tetap	285.462	3l,4,12	270.978	*Fixed assets*
Dikurangi: Akumulasi penyusutan	(71.889)		(58.562)	*Less: Accumulated depreciation*
Jumlah aset tetap - bersih	213.573		212.416	*Total fixed assets - net*
Aset hak guna	166.100	3u,4,12	168.386	*Right of use assets*
Dikurangi: Akumulasi penyusutan	(107.390)		(72.434)	*Less: Accumulated depreciation*
Jumlah aset hak guna - bersih	58.710		95.952	*Total right of use assets - net*
Aset tak berwujud - bersih	151.403	3n,13	134.577	*Intangible assets - net*
Aset pajak tangguhan	-	3v,4,19d	14.883	*Deferred tax assets*
Aset lain-lain - bersih	592.166	3c,3e,3k, 3m,3o,3ad,4, 14,36,38,39	680.909	*Other assets - net*
JUMLAH ASET	**18.973.769**		**17.409.065**	***TOTAL ASSETS***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK NEO COMMERCE Tbk
LAPORAN POSISI KEUANGAN (lanjutan)
Tanggal 31 Desember 2025
(Disajikan dalam Jutaan Rupiah, Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF FINANCIAL POSITION (continued)
As of December 31, 2025
(Expressed in Millions of Rupiah, Unless Otherwise Stated)

	31 Desember 2025/ ***December 31, 2025***	**Catatan/** ***Notes***	**31 Desember 2024/** ***December 31, 2024***	
LIABILITAS DAN EKUITAS				***LIABILITIES AND EQUITY***
Liabilitas segera		3c,3e,3p,15, 38,39		*Liabilities due immediately*
Pihak berelasi	280	36	677	*Related parties*
Pihak ketiga	223.187		190.074	*Third parties*
	223.467		190.751	
Simpanan nasabah		3c,3e,3q, 16,38,39,		*Deposits from customers*
Pihak berelasi	180.142	36	68.731	*Related parties*
Pihak ketiga	13.846.000		12.995.061	*Third parties*
	14.026.142		13.063.792	
Simpanan dari bank lain		3e,3r,		*Deposits from other banks*
Pihak ketiga	71.891	17,38,39	129.079	*Third parties*
Liabilitas sewa	49.729	3e,3u,4, 18,38,39	80.403	*Lease liabilities*
Utang pajak	18.098	3v,19a	15.076	*Taxes payable*
Liabilitas imbalan kerja karyawan	25.030	3w,4,20	22.540	*Employee benefit liabilities*
Liabilitas pajak tangguhan	12.707	3v,4,19d	-	*Deffered tax liabilities*
Liabilitas lain-lain	315.979	3c,3e, 21,36,38,39	345.587	*Other liabilities*
JUMLAH LIABILITAS	**14.743.043**		**13.847.228**	***TOTAL LIABILITIES***
EKUITAS				***EQUITY***
Modal saham - nilai nominal Rp100 (nilai penuh) per saham				*Share capital - par value Rp100 (full amount) per share*
Modal dasar 30.000.000.000 lembar saham pada 31 Desember 2025 dan 2024				*Authorized capital 30,000,000,000 shares as of December 31, 2025 and 2024*
Modal ditempatkan dan disetor penuh 13.350.482.346 lembar saham pada 31 Desember 2025 dan 2024	1.335.048	22	1.335.048	*Issued and fully paid capital 13,350,482,346 shares as of December 31, 2025 and 2024*
Tambahan modal disetor	4.485.444	3ac,23	4.485.444	*Additional paid-in capital*
Dana setoran modal	12.099	24	12.099	*Capital deposit fund*
Saldo laba (defisit):				*Retained earning (deficits):*
Telah ditentukan penggunaannya	21.087	25	21.087	*Appropriated*
Belum ditentukan penggunaannya	(1.729.404)		(2.296.783)	*Unappropriated*
Komponen ekuitas lainnya:				*Other equity components:*
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - neto	59.381	3e	(42.255)	*Unrealized gain/(loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income - net*
Cadangan kerugian penurunan nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	6	3e,4,9g	-	*Allowance for impairment losses on marketable securities measured at fair value through other comprehensive income*
Surplus revaluasi	47.065	3l,12	47.197	*Revaluation surplus*
JUMLAH EKUITAS	**4.230.726**		**3.561.837**	***TOTAL EQUITY***
JUMLAH LIABILITAS DAN EKUITAS	**18.973.769**		**17.409.065**	***TOTAL LIABILITIES AND EQUITY***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK NEO COMMERCE Tbk
LAPORAN LABA RUGI
DAN PENGHASILAN KOMPREHENSIF LAIN
Untuk Tahun yang Berakhir pada Tanggal
31 Desember 2025
(Disajikan dalam Jutaan Rupiah,
Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF PROFIT OR LOSS
AND OTHER COMPREHENSIVE INCOME
For the Year Ended
December 31, 2025
(Expressed in Millions of Rupiah,
Unless Otherwise Stated)

	2025	Catatan/ *Notes*	2024	
PENDAPATAN DAN BEBAN BUNGA				***INTEREST INCOME AND EXPENSES***
Pendapatan bunga	3.145.192	3c,3e,3s, 3z,26,36	3.612.292	*Interest income*
Beban bunga	(792.194)	3z,27	(871.037)	*Interest expense*
Pendapatan bunga bersih	2.352.998		2.741.255	*Net interest income*
PENDAPATAN OPERASIONAL LAINNYA				***OTHER OPERATING INCOME***
Penerimaan kembali aset yang telah dihapusbukukan	251.168	3aa	315.900	*Recovery of assets previously written off*
Provisi dan komisi lainnya	60.793	3s,3aa	64.116	*Other provision and commissions*
Pendapatan *fee* ATM	10.657	3aa	22.408	*ATM fee income*
Lainnya	87.519	3aa,28	178.508	*Others*
Jumlah pendapatan operasional lainnya	**410.137**		**580.932**	***Total other operating income***
BEBAN OPERASIONAL				***OPERATING EXPENSES***
Kerugian penurunan nilai aset keuangan dan non keuangan	(1.335.062)	3e,3o,29	(2.323.296)	*Impairment losses on financial and non financial assets*
Beban umum dan administrasi	(453.285)	3aa,30	(523.388)	*General and administrative expenses*
Beban tenaga kerja	(354.451)	3c,3w, 3aa,31,36	(356.761)	*Personnel expenses*
Beban pemasaran	(57.902)	3aa,32	(83.575)	*Marketing expenses*
Beban provisi dan komisi lainnya	-	3c,3s,3aa, 36	(6.712)	*Other provision and commission expenses*
Jumlah beban operasional	**(2.200.700)**		**(3.293.732)**	***Total operating expenses***
LABA OPERASIONAL	**562.435**		**28.455**	***PROFIT FROM OPERATIONS***
PENDAPATAN/(BEBAN) NON-OPERASIONAL				***NON-OPERATING INCOME/ (EXPENSES)***
Pendapatan non-operasional	4.877	3t,33	793	*Non-operating income*
Beban non-operasional	(3.137)	3t,34	(10.564)	*Non-operating expenses*
Jumlah pendapatan/(beban) non-operasional, bersih	**1.740**		**(9.771)**	***Total non-operating income/ (expenses), net***
LABA SEBELUM PAJAK PENGHASILAN	**564.175**		**18.684**	***PROFIT BEFORE INCOME TAX***
MANFAAT PAJAK PENGHASILAN				***INCOME TAX BENEFIT***
Manfaat pajak tangguhan	1.515	3v,19b,19d	1.201	*Deferred tax benefit*
LABA BERSIH TAHUN BERJALAN	**565.690**		**19.885**	***NET PROFIT FOR THE CURRENT YEAR***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK NEO COMMERCE Tbk
LAPORAN LABA RUGI DAN PENGHASILAN KOMPREHENSIF LAIN (lanjutan)
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2025
(Disajikan dalam Jutaan Rupiah, Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF PROFIT OR LOSS AND OTHER COMPREHENSIVE INCOME (continued)
For the Year Ended December 31, 2025
(Expressed in Millions of Rupiah, Unless Otherwise Stated)

	2025	Catatan/ *Notes*	2024	
PENGHASILAN KOMPREHENSIF LAIN				***OTHER COMPREHENSIVE INCOME***
Pos-pos yang akan direklasifikasikan ke laba rugi				***Items that will be reclassified to profit or loss***
Keuntungan/(kerugian) yang belum direalisasi atas perubahan nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	130.302	3e,9	(66.446)	*Unrealized gain/(loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income*
(Beban)/pendapatan pajak terkait	(28.666)	3v,19d	14.618	*Related (expense)/income tax*
	101.636		(51.828)	
Cadangan kerugian penurunan nilai atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	6	3e,4,9g	-	*Allowance for impairment losses on marketable securities measured at fair value through comprehensive income*
	101.642		(51.828)	
Pos-pos yang tidak akan direklasifikasi ke laba rugi				***Items that will not be reclassified to profit and loss***
Pengukuran kembali liabilitas imbalan kerja karyawan	1.996	3w,4,20	(223)	*Remeasurement of employee benefit liabilities*
(Beban)/pendapatan pajak terkait	(439)	3v,19d	49	*Related income/(expense) tax*
	1.557		(174)	
Surplus revaluasi aset tetap	-	3l,4,12	1.111	*Revaluation surplus of fixed assets*
Amortisasi surplus revaluasi aset tetap	(132)	3l,12	(317)	*Amortization of revaluation surplus of fixed assets*
	(132)		794	
PENGHASILAN/(RUGI) KOMPREHENSIF LAIN, BERSIH SETELAH PAJAK	**103.067**		**(51.208)**	***OTHER COMPREHENSIVE INCOME/(LOSS), NET AFTER TAX***
JUMLAH PENGHASILAN/(RUGI) KOMPREHENSIF TAHUN BERJALAN	**668.757**		**(31.323)**	***TOTAL COMPREHENSIVE INCOME/(LOSS) FOR THE CURRENT YEAR***
LABA PER SAHAM				***PROFIT PER SHARE***
Dasar (nilai penuh)	42,37	3x,41	1,58	*Basic (full amount)*
Dilusian (nilai penuh)	42,37	3x,41	1,58	*Diluted (full amount)*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK NEO COMMERCE Tbk
LAPORAN PERUBAHAN EKUITAS
Untuk Tahun yang Berakhir
pada Tanggal 31 Desember 2025
(Disajikan dalam Jutaan Rupiah, Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF CHANGES IN EQUITY
For the Year Ended
December 31, 2025
(Expressed in Millions of Rupiah, Unless Otherwise Stated)

	Catatan/ *Notes*	Modal saham/ *Share capital*	Tambahan modal disetor/ *Additional paid-in capital*	Dana setoran modal/ *Capital deposit fund*	Saldo laba (defisit)/ *Retained earnings (deficit)*		Keuntungan/ (kerugian) yang belum direalisasi atas nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak/ *Unrealized gain/ (loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*	Surplus revaluasi/ *Revaluation surplus*	Cadangan kerugian penurunan nilai atas efek-efek yang diukur pada nilai wajar melaui penghasilan komprehensif lain/ *Allowance for impairment losses on marketable securities measured at fair value through other comprehensive income*	Total ekuitas/ *Total equity*	
					Ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya*)/ *Unappropriated*)					
Saldo per 1 Januari 2025		**1.335.048**	**4.485.444**	**12.099**	**21.087**	**(2.296.783)**	**(42.255)**	**47.197**	**-**	**3.561.837**	***Balance as of January 1, 2025***
Laba bersih tahun berjalan		-	-	-	-	565.690	-	-	-	565.690	*Net income for the current year*
Amortisasi surplus revaluasi aset tetap	3l,4,12	-	-	-	-	132	-	(132)	-	-	*Amortization of revaluation surplus of fixed asset*
Pengukuran kembali imbalan kerja karyawan, setelah pajak	3w,4,20	-	-	-	-	1.557	-	-	-	1.557	*Remeasurement of employee benefit liabilities - net of tax*
Keuntungan yang belum terealisasi atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	3e,9a	-	-	-	-	-	101.636	-	-	101.636	*Unrealized gain on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*
Cadangan kerugian penurunan nilai atas efek-efek yang diukur sebagai nilai wajar melalui penghasilan komprehensif lain	3e,4,9g	-	-	-	-	-	-	-	6	6	*Allowance for impairment losses on marketable securities measured at fair value through other comprehensive income*
Saldo per 31 Desember 2025		**1.335.048**	**4.485.444**	**12.099**	**21.087**	**(1.729.404)**	**59.381**	**47.065**	**6**	**4.230.726**	***Balance as of December 31, 2025***

*) Termasuk pengukuran kembali liabilitas imbalan kerja karyawan

*Include remeasurement of employee benefit liabilities *)*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as whole.

PT BANK NEO COMMERCE Tbk
LAPORAN PERUBAHAN EKUITAS (lanjutan)
Untuk Tahun yang Berakhir
pada Tanggal 31 Desember 2024
(Disajikan dalam Jutaan Rupiah, kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF CHANGES IN EQUITY (continued)
For the Year Ended
December 31, 2024
(Expressed in Millions of Rupiah, Unless Otherwise Stated)

	Catatan/ *Notes*	Modal saham/ *Share capital*	Tambahan modal disetor/ *Additional paid-in capital*	Dana setoran modal/ *Capital deposit fund*	Saldo laba (defisit)/ *Retained earnings (deficit)*		Keuntungan/ (kerugian) yang belum direalisasi atas nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain - setelah pajak/ *Unrealized gain/ (loss) on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*	Surplus revaluasi/ *Revaluation surplus*	Total ekuitas/ *Total equity*	
					Ditentukan penggunaannya/ *Appropriated*	Belum ditentukan penggunaannya*)/ *Unappropriated**				
Saldo per 1 Januari 2024		**1.203.882**	**4.253.905**	**105.000**	**21.087**	**(2.316.811)**	**9.573**	**46.403**	**3.323.039**	***Balance as of January 1, 2024***
Penawaran umum terbatas VI**)	22,23	131.166	231.539	(393.499)	-	-	-	-	(30.794)	*Limited public offering VI***)*
Dana setoran modal***)	24	-	-	300.598	-	-	-	-	300.598	*Capital deposit fund***)*
Laba bersih tahun berjalan		-	-	-	-	19.885	-	-	19.885	*Net income for the current year*
Surplus revaluasi aset tetap	3l,4,12	-	-	-	-	-	-	1.111	1.111	*Revaluation surplus of fixed asset*
Amortisasi surplus revaluasi aset tetap	3l,12	-	-	-	-	317	-	(317)	-	*Amortization of revaluation surplus of fixed asset*
Pengukuran kembali imbalan kerja karyawan, setelah pajak	3w,4,20	-	-	-	-	(174)	-	-	(174)	*Remeasurement of employee benefit liabilities - net of tax*
Kerugian yang belum terealisasi atas efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, setelah pajak	3e,9a	-	-	-	-	-	(51.828)	-	(51.828)	*Unrealized loss on changes in fair value of marketable securities measured at fair value through other comprehensive income - net of tax*
Saldo per 31 Desember 2024		**1.335.048**	**4.485.444**	**12.099**	**21.087**	**(2.296.783)**	**(42.255)**	**47.197**	**3.561.837**	***Balance as of December 31, 2024***

*) Termasuk pengukuran kembali liabilitas imbalan kerja karyawan

**) Termasuk sebesar Rp30.794 yang merupakan biaya emisi efek yang dikapitalisasi sehubungan dengan Penawaran Umum Terbatas VII

***) Terdiri dari setoran modal sebesar Rp300.000 dan Rp598 dari Penawaran Umum Terbatas VI dan VII

*Include remeasurement of employee benefit liabilities *)*

*Include capitalized share issuance cost in relation with Limited Public Offering VII amounted to Rp30,794 **)*

*Consist of capital deposit funds amounted to Rp300,000 and Rp598 from Limited Public Offering VI and VII**)*

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as whole.

PT BANK NEO COMMERCE Tbk
LAPORAN ARUS KAS
Untuk Tahun yang Berakhir pada Tanggal 31 Desember 2025
(Disajikan dalam Jutaan Rupiah, Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF CASH FLOWS
For the Year Ended December 31, 2025
(Expressed in Millions of Rupiah, Unless Otherwise Stated)

	2025	Catatan/ *Notes*	2024	
ARUS KAS DARI AKTIVITAS OPERASI				***CASH FLOWS FROM OPERATING ACTIVITIES***
Penerimaan pendapatan bunga, provisi dan komisi	3.194.945		3.733.301	*Receipt from interest income, provision and commissions*
Pembayaran beban bunga, provisi dan komisi	(780.190)		(848.026)	*Payment of interest expense, provision and commissions*
Pembayaran beban tenaga kerja	(340.693)		(356.859)	*Payment of personnel expenses*
Pembayaran beban umum dan administrasi	(243.621)		(390.969)	*Payment of general and administrative expenses*
Penerimaan dari pendapatan operasional lainnya	415.013		581.725	*Receipt from other operating income*
Pembayaran beban operasional lainnya	(3.137)		(10.563)	*Payment of other operating expense*
Pembayaran beban pemasaran	(57.902)		(83.575)	*Payments of marketing expenses*
Arus kas dari aktivitas operasi sebelum perubahan dalam aset dan liabilitas operasi	2.184.415		2.625.034	*Cash flows from operating activities before changes in operating assets and liabilities*
(Kenaikan)/penurunan aset operasi:				*(Increase)/decrease in operating assets:*
Efek yang dibeli dengan janji dijual kembali	1.226.924	10	(1.271.851)	*Securities purchased under agreements to resell*
Kredit yang diberikan	225.072	11	(267.106)	*Loans*
Pajak dibayar dimuka	-		2.155	*Prepaid Taxes*
Aset lain-lain	(136.729)		143.066	*Other assets*
	1.315.267		(1.393.736)	
Kenaikan/(penurunan) liabilitas operasi:				*Increase/(decrease) in operating liabilities:*
Simpanan dari nasabah	962.350	16	(808.478)	*Deposits from customers*
Simpanan dari bank lain	(57.188)	17	104.167	*Deposits from other banks*
Liabilitas segera	19.345	15	(95.070)	*Liabilities due immediately*
Utang pajak	3.022	19	(6.792)	*Taxes payable*
Liabilitas lain-lain	(35.028)		(304.558)	*Other liabilities*
	892.501		(1.110.731)	
Arus kas bersih yang diperoleh dari aktivitas operasi	**4.392.183**		**120.567**	***Net cash flows provided by operating activities***
ARUS KAS DARI AKTIVITAS INVESTASI				***CASH FLOWS FROM INVESTING ACTIVITIES***
Hasil penjualan efek-efek	597.968	9	148.225	*Proceeds from sale of marketable securities*
Efek-efek yang telah jatuh tempo	10.488.317	9	5.039.425	*Matured marketable securities*
Pembelian efek-efek	(13.724.809)	9	(6.499.508)	*Purchase of marketable securities*
(Kenaikan)/penurunan efek-efek diukur pada nilai wajar melalui penghasilan komprehensif lain	(115.753)	9	(87.689)	*(Increase)/decrease of marketable securities measured at fair value through other comprehensive income*
Hasil penjualan aset tetap	820	12	1.570	*Proceeds from sale of fixed assets*
Perolehan aset tetap	(21.857)	12	(21.034)	*Acquisition of fixed assets*
Perolehan aset tak berwujud	(30.141)	13	(5.423)	*Acquisition of intangible assets*
Arus kas bersih yang digunakan untuk aktivitas investasi	**(2.805.455)**		**(1.424.434)**	***Net cash flows used in investing activities***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK NEO COMMERCE Tbk
LAPORAN ARUS KAS (lanjutan)
Untuk Tahun yang Berakhir
pada Tanggal 31 Desember 2025
(Disajikan dalam Jutaan Rupiah,
Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
STATEMENT OF CASH FLOWS (continued)
For the Year Ended
December 31, 2025
(Expressed in Millions of Rupiah,
Unless Otherwise Stated)

	2025	Catatan/ *Notes*	2024	
ARUS KAS DARI AKTIVITAS PENDANAAN				***CASH FLOWS FROM FINANCING ACTIVITIES***
Dana setoran modal	-	24	300.598	*Capital deposit fund*
Realisasi atas biaya emisi saham	-	23	(30.794)	*Realization of share issuance fee*
Pembayaran liabilitas sewa	(37.560)	18,42	(45.742)	*Payment of lease liabilities*
Arus kas bersih yang (digunakan untuk)/diperoleh dari aktivitas pendanaan	**(37.560)**		**224.062**	***Net cash flows (used in)/provided by financing activities***
Kenaikan/(penurunan) bersih kas dan setara kas	**1.549.168**		**(1.079.805)**	***Net increase/(decrease) in cash and cash equivalents***
KAS DAN SETARA KAS AWAL TAHUN	**1.523.144**		**2.602.949**	***CASH AND CASH EQUIVALENTS AT BEGINNING OF YEAR***
KAS DAN SETARA KAS AKHIR TAHUN	**3.072.312**		**1.523.144**	***CASH AND CASH EQUIVALENTS AT END OF YEAR***
Kas dan setara kas terdiri dari:				***Cash and cash equivalents consist of:***
Kas	9.760	5	12.133	*Cash*
Giro pada Bank Indonesia	1.144.566	6	1.274.118	*Current accounts with Bank Indonesia*
Giro pada bank lain	54.595	7	80.789	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.863.391	8	156.104	*Placements with Bank Indonesia and other banks*
Jumlah kas dan setara kas	**3.072.312**		**1.523.144**	***Total cash and cash equivalents***

Catatan atas laporan keuangan terlampir merupakan bagian yang tidak terpisahkan dari laporan keuangan secara keseluruhan.

The accompanying notes to the financial statements form an integral part of these financial statements taken as a whole.

PT BANK NEO COMMERCE Tbk
CATATAN ATAS LAPORAN KEUANGAN
Tanggal 31 Desember 2025
dan untuk Tahun yang Berakhir
pada Tanggal Tersebut
(Disajikan dalam Jutaan Rupiah,
Kecuali Dinyatakan Lain)

PT BANK NEO COMMERCE Tbk
NOTES TO THE
FINANCIAL STATEMENTS
As of December 31, 2025
and for The Year Then Ended
(Expressed in Millions of Rupiah,
Unless Otherwise Stated)

1. UMUM

a. Pendirian Bank dan informasi umum

PT Bank Neo Commerce Tbk, dahulu PT Bank Yudha Bhakti Tbk (selanjutnya disebut "Bank") berkedudukan di Jakarta, didirikan berdasarkan Akta No. 68 tanggal 19 September 1989, kemudian diubah dengan Akta No. 13 tanggal 2 November 1989 keduanya dibuat di hadapan Amrul Partomuan, Sarjana Hukum, Magister Hukum, Notaris di Jakarta. Akta Pendirian tersebut telah mendapat pengesahan dari Menteri Kehakiman Republik Indonesia melalui Surat Keputusan No.C2-10215.HT.01.01.TH'89 tanggal 7 November 1989 dan telah diumumkan dalam Lembaran Berita Negara Republik Indonesia No. 99 tanggal 12 Desember 1989 Tambahan No. 3470/1989.

Sesuai dengan perubahan Anggaran Dasar pada Akta No. 23 tanggal 30 Juli 2020 dari Dr. Agung Iriantoro, S.H., M.H., Notaris di Jakarta, "PT Bank Yudha Bhakti Tbk" telah berubah nama menjadi "PT Bank Neo Commerce Tbk". Perubahan Anggaran Dasar ini telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia dengan Surat No. AHU-0053297.AH.01.02 Tahun 2020 tanggal 4 Agustus 2020. Perubahan nama tersebut telah disetujui oleh Otoritas Jasa Keuangan ("OJK") melalui Surat OJK No. S-315/PB.12.2020 tanggal 7 September 2020 dan Salinan Keputusan OJK No. KEP-121/PB.1/2020 tanggal 2 September 2020.

Akta Pendirian Bank telah mengalami beberapa kali perubahan dan penambahan yang kemudian diubah seluruhnya serta disesuaikan dengan Undang-Undang No. 40 Tahun 2007 tentang Perseroan Terbatas berdasarkan Akta No. 02 tanggal 3 November 2008 yang dibuat dihadapan Pudji Redjeki Irawato, Sarjana Hukum, Notaris di Jakarta, yang telah mendapat persetujuan dari Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui Surat Keputusan No. AHU-06842.AH.01.02.2009 tanggal 11 Maret 2009.

1. GENERAL

a. Establishment of the Bank and general information

PT Bank Neo Commerce Tbk, formerly PT Bank Yudha Bhakti Tbk (hereinafter referred to as "Bank") domiciled in Jakarta, was established based on Deed No. 68 dated September 19, 1989, then amended by Deed No. 13 dated November 2, 1989 both of which were drawn up before Amrul Partomuan, Bachelor of Law, Master of Laws, Notary in Jakarta. The Deed of Establishment was approved by the Minister of Justice of the Republic of Indonesia through Decree No. C2-10215.HT.01.01.TH'89 dated November 7, 1989 and has been published in the State Gazette of the Republic of Indonesia No. 99 dated December 12, 1989 Supplement No. 3470/1989.

Based on the Bank's Articles of Association's amendment by Deed No. 23 dated July 30, 2020 of Dr. Agung Iriantoro, S.H., M.H., Notary in Jakarta, "PT Bank Yudha Bhakti Tbk" has changed its name to "PT Bank Neo Commerce Tbk". These amendments were approved by Minister of Law and Human Rights of the Republic of Indonesia in his Decision Letter No. AHU-0053297.AH.01.02 Year 2020 dated August 4, 2020. The change in the Bank's name had been approved by the Financial Services Authority ("OJK") through the OJK Letter No. S-315/PB.12.2020 dated September 7, 2020 and a copy of decisions of OJK No. KEP-121/PB.1/2020 dated September 2, 2020.

The Bank's deed of establishment has been amended and added several times, of which it was fully converted and adjusted to Law No. 40 of Year 2007 regarding Limited Liability Company based on notarial deed No. 02 dated November 3, 2008 of Pudji Redjeki Irawato, Bachelor of Law, Notary in Jakarta. The notarial deed was received and acknowledged by the Minister of Law and Human Rights of the Republic of Indonesia through decision Letter No. AHU-06842.AH.01.02.2009 dated March 11, 2009.

1. UMUM (lanjutan)

a. Pendirian Bank dan informasi umum (lanjutan)

Perubahan Akta Pendirian Bank terakhir berdasarkan Akta No. 07 tanggal 27 Juli 2023 yang dibuat dihadapan Dr. Agung Iriantoro, S.H., M.H., Notaris di Jakarta, yang telah disetujui oleh Menteri Hukum dan Hak Asasi Manusia Republik Indonesia melalui Surat Keputusan No. AHU-0043336.AH.01.02. Tahun 2023 tanggal 27 Juli 2023 dan telah terdaftar dalam Daftar Perseroan No. AHU-0142875.AH.01.11. Tahun 2023 tanggal 27 Juli 2023.

Izin usaha sebagai Bank Umum diberikan oleh Menteri Keuangan Republik Indonesia dengan Surat Keputusan No. 1344/KMK.013/1989 tanggal 9 Desember 1989. Bank mulai beroperasi secara komersial pada tanggal 9 Januari 1990.

Entitas induk langsung dan terakhir dari Bank pada tanggal 31 Desember 2025 dan 2024 adalah PT Akulaku Silvrr Indonesia.

Kantor Pusat Bank berlokasi di Treasury Tower Lantai 60 Jl. Jendral Sudirman Kav. 52-53, Senayan Kebayoran Baru, Jakarta Selatan.

Pada tanggal 31 Desember 2025 dan 2024, Bank berkantor pusat di Jakarta dan memiliki kantor cabang utama, kantor cabang dan kantor cabang pembantu, dengan rincian sebagai berikut:

1. GENERAL (continued)

a. Establishment of the Bank and general information (continued)

The last Bank's deed of establishment has been amended based on Deed No. 07 dated July 27, 2023 drawn up before Dr. Agung Iriantoro, S.H., M.H., Notary in Jakarta, which has obtained approval from the Minister of Law and Human Rights of the Republic of Indonesia through Decree No. AHU-0043336.AH.01.02. Tahun 2023 dated July 27, 2023 and has been registered in the Company Register No. AHU-0142875.AH.01.11 Tahun 2023 dated July 27, 2023.

The business license as a Commercial Bank was given by the Minister of Finance of the Republic of Indonesia with Decree No. 1344/KMK.013/1989 dated December 9, 1989. The Bank commenced its commercial operations on January 9, 1990.

The Bank's immediate and ultimate parent entity as of December 31, 2025 and 2024 is PT Akulaku Silvrr Indonesia.

The Bank's head office is located at the Treasury Tower, 60th Floor Jl. Jendral Sudirman Kav. 52-53, Senayan Kebayoran Baru, South Jakarta.

As of December 31, 2025 and 2024, the Bank's headquarter is in Jakarta and has main branch office, branch offices and sub-branch offices, with the following details:

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Kantor Cabang Utama	KCU Jakarta	KCU Jakarta	*Main Branch Office*
Kantor Cabang	Surabaya	Surabaya	*Branch Offices*
	Bandung	Bandung	
	Medan	Semarang	
	Makassar	Medan	
	Malang	Makassar	
		Malang	
Kantor Cabang Pembantu	Pantai Indah Kapuk	Pantai Indah Kapuk	*Sub-Branch Offices*

Berdasarkan keputusan OJK No. S-143/PB. 31/2020 pada tanggal 18 September 2020, Bank resmi menyandang status sebagai BUKU (Bank Umum Kegiatan Usaha) II. Sejak 2021, sesuai dengan POJK No. 12/POJK.03/2021 Bank menjadi Kelompok Berdasarkan Modal Inti (KBMI) 1.

Based on OJK decision No. S-143/PB.31/2020 on September 18, 2020, the Bank officially holds the status as Bank BUKU II. Since 2021, based on POJK No. 12/POJK.03/2021, the Bank became classified in the category with core capital (KBMI) of 1.

1. UMUM (lanjutan)

b. Penawaran Umum Perdana

Pada tanggal 6 November 2014, Bank menerima surat dari Bursa Efek Indonesia ("BEI") No. S-05288/BEI.PG1/11-2014 mengenai Persetujuan Permohonan Perjanjian Pendahuluan Pencatatan. Kemudian tanggal 31 Desember 2014 Bank menerima surat dari OJK No. S-584/D.04.2014 perihal Pemberitahuan Efektif Pernyataan Pendaftaran, yaitu dalam rangka penawaran umum perdana saham Bank. Selanjutnya, pada tanggal 13 Januari 2015, saham Bank telah dicatatkan di Bursa Efek Indonesia sebanyak 300.000.000 lembar saham biasa atas nama yang merupakan saham baru yang berasal dari portepel atau sebesar 11,93% dari modal ditempatkan dan disetor penuh setelah penawaran umum perdana saham dengan nilai nominal sebesar Rp100 (nilai penuh) setiap saham yang ditawarkan kepada masyarakat dengan harga penawaran Rp115 (nilai penuh) setiap saham. Dana hasil penawaran umum perdana adalah sebesar Rp34.500.000.000 (nilai penuh). Jumlah seluruh saham setelah penawaran umum perdana adalah sebanyak 2.515.160.000 lembar saham.

c. Penawaran Umum Terbatas I

Sesuai Hasil Rapat Umum Pemegang Saham Luar Biasa ("RUPSLB") per tanggal 10 Maret 2016 disepakati bahwa Bank akan menawarkan saham baru sebanyak-banyaknya sebesar 2.500.000.000 saham dan penerbitan waran sebanyak-banyaknya 880.000.000 lembar dengan Hak Memesan Efek Terlebih Dahulu ("HMETD"). Keputusan ini dituangkan dalam Akta Pernyataan Keputusan Rapat No. 18 tanggal 10 Maret 2016 yang dibuat oleh Notaris Agung Iriantoro SH, MH.

Pada tanggal 23 Maret 2016, Bank mengajukan pernyataan pendaftaran dalam rangka Penawaran Umum Terbatas ("PUT") I melalui surat No. 017/SET/DIR/BYBTBK/III/2016 kepada OJK-Pasar Modal dan kemudian tanggal 2 Mei 2016 Bank menerima surat pemberitahuan efektifnya pernyataan pendaftaran dari OJK-Pasar Modal melalui surat No. S-215/D.04/2016.

Dalam pelaksanaan PUT I, sebanyak 1.509.096.000 saham baru dengan nilai nominal Rp100 (nilai penuh) per lembar saham dan harga pelaksanaan Rp125 (nilai penuh) per lembar sahamnya berhasil diserap, sehingga dana yang berhasil dihimpun dari proses PUT I tersebut sebesar Rp188.637.000.000 (nilai penuh).

1. GENERAL (continued)

b. Initial Public Offering

On November 6, 2014, the Bank received a letter from the Indonesia Stock Exchange ("IDX") with details of S-05288/BEI.PG1/11-2014 regarding the Preliminary Agreement of Registration Application Approval. On December 31, 2014, the Bank received a letter from OJK with details of S-584/D.04.2014 Notification concerning Effective Registration Statement, namely in the framework of the initial public offering of shares of the Bank. Furthermore, on January 13, 2015, the Bank's shares have been listed in the Indonesian Stock Exchange consisting of 300,000,000 ordinary shares which are derived from the new shares of the Bank's portfolio amounting to 11.93% of the issued and fully paid after the initial public offering of shares with nominal value of Rp100 (full amount) per share and offering price to the public of Rp115 (full amount) per share. The funds from the initial public offering amounted Rp34,500,000,000 (full amount). The total shares after the initial public offering is 2,515,160,000 shares.

c. Limited Public Offering I

Based on the results of the Extraordinary General Meeting of Shareholders ("EGMS") dated March 10, 2016, it was agreed that the Bank will offer new shares at maximum of 2,500,000,000 shares and warrants at maximum of 880,000,000 of warrants with Pre-emptive Rights. The decision was in accordance with Notarial Deed No. 18 dated March 10, 2016 by Notary Agung Iriantoro SH, MH.

On March 23, 2016, the Bank filed a registration statement for Limited Public Offering ("LPO") I through letter No. 017/SET/DIR/BYB-TBK/III/2016 to OJK-Capital Market and then on May 2, 2016, the Bank received a letter on effective registration notification from OJK-Capital Market through letter No. S-215/D.04/2016.

In LPO I, 1,509,096,000 new shares with a nominal value of Rp100 (full amount) per share and an exercise price of Rp125 (full amount) per share were successfully absorbed, as such the funds gathered from the LPO I amounted to Rp188,637,000,000 (full amount).

1. UMUM (lanjutan)

c. Penawaran Umum Terbatas I (lanjutan)

Penerbitan waran yang dilaksanakan sampai dengan 18 Mei 2018, dari 880.000.000 waran, berhasil diserap sebesar 746.967.673 waran dengan harga pelaksanaan Rp135 (nilai penuh) per waran, sehingga dana yang berhasil diserap adalah sebesar Rp100.840.635.855 (nilai penuh).

d. Saham Bonus

Pada RUPSLB tanggal 17 April 2017, Para Pemegang Saham menyetujui pembagian saham bonus yang berasal dari kapitalisasi agio saham sampai dengan tahun buku 2016 sebanyak-banyaknya Rp44.666.387.150 (nilai penuh) atau sebanyak-banyaknya 446.663.871 saham dengan nilai nominal saham Rp100 (nilai penuh) per lembar saham. Pada tanggal 31 Mei 2017, Bank telah mendistribusikan saham bonus sejumlah 421.362.511 lembar saham dengan nilai nominal Rp100 (nilai penuh) per lembar saham.

e. Penawaran Umum Terbatas II

Pada RUPSLB tanggal 27 Juni 2018, Para Pemegang Saham menyetujui untuk melakukan Penawaran Umum Terbatas ("PUT") II dengan Hak Memesan Efek Terlebih Dahulu kepada Para Pemegang Saham dalam rangka penerbitan saham baru sebanyak-banyaknya 3.000.000.000 saham dan penerbitan Waran Seri II sebanyak banyaknya sebesar 1.700.000.000 lembar.

Pada tanggal 28 Mei 2019, Bank mendapatkan pernyataan efektif dari OJK melalui surat No. S-64/D.04/2019. Dalam pelaksanaan PUT II, Bank mengeluarkan 499.603.954 lembar saham baru dengan nilai nominal Rp100 (nilai penuh) per lembar saham dan harga pelaksanaan Rp338 (nilai penuh) per lembar saham. Pada PUT II, terdapat pembeli siaga yaitu PT Akulaku Silvrr Indonesia, sehingga seluruh saham yang ditawarkan diserap habis dan jumlah dana yang diterima Bank adalah sebesar Rp168.866.136.452 (nilai penuh).

1. GENERAL (continued)

c. Limited Public Offering I (continued)

Meanwhile, for the issuance of warrants which were exercised up to May 18, 2018, from 880,000,000 warrants, 746,967,673 warrants were successfully absorbed with an exercise price of Rp135 (full amount) per warrant, as such, the funds gathered amounted to Rp100,840,635,855 (full amount).

d. Bonus Share

On the EGMS dated April 17, 2017, the Shareholders agreed to distribute bonus shares resulting from capitalization of share premium up to the 2016 financial year of a maximum of Rp44,666,387,150 (full amount) or a maximum of 446,663,871 shares with a nominal value of Rp100 (full amount) per share. On May 31, 2017, the Bank distributed bonus shares totaling 421,362,511 shares with a nominal value of Rp100 (full amount) per share.

e. Limited Public Offering II

On the EGMS dated June 27, 2018, the Shareholders agreed to conduct a Limited Public Offering ("LPO") II with Pre-emptive Rights to the Shareholders for the issuance of new shares of maximum 3,000,000,000 new shares and the issuance of Series II Warrants of maximum of 1,700,000,000 warrants.

On May 28, 2019, the Bank received an effective statement from OJK through letter No. S-64/D.04/2019. In the implementation of LPO II, the Bank issued 499,603,954 new shares with a nominal value of Rp100 (full amount) per share and an exercise price of Rp338 (full amount) per share. In LPO II, there was a standby buyer, PT Akulaku Silvrr Indonesia, therefore, all the shares offered were absorbed and the total funds received by the Bank amounted to Rp168,866,136,452 (full amount).

1. UMUM (lanjutan)

f. Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu

Pada RUPSLB tanggal 27 Juni 2018, para Pemegang Saham juga menyetujui untuk melakukan Penambahan Modal Tanpa Hak Memesan Efek Terlebih Dahulu ("PMTHMETD") kepada investor strategis dengan jumlah sebanyak-banyaknya 469.591.963 saham baru.

Pada tanggal 22 Maret 2019, Bank telah melaksanakan PMTHMETD dengan menerbitkan sebanyak 469.591.963 saham baru dengan nilai nominal Rp100 (nilai penuh) per lembar saham dan harga pelaksanaan Rp338 (nilai penuh) per lembar saham. Penambahan saham tersebut merupakan hasil dari penambahan modal oleh PT Akulaku Silvrr Indonesia. Dana yang diterima dari PMTHMETD ini adalah sebesar Rp158.722.083.494 (nilai penuh).

g. Penawaran Umum Terbatas III

Berdasarkan hasil RUPSLB pada tanggal 28 Juni 2019, Pemegang Saham Bank menyetujui untuk melaksanakan Penawaran Umum Terbatas ("PUT") III dengan Hak Memesan Efek Terlebih Dahulu kepada para pemegang saham dengan sebanyak-banyaknya saham yang akan dikeluarkan sebesar 3.000.000.000 lembar saham.

Pada tanggal 18 Juni 2020, Bank mendapatkan pernyataan efektif dari OJK melalui surat No. S-66/D.04/2020. Dalam pelaksanaan PUT III, ditawarkan sebanyak-banyaknya 1.320.381.878 saham baru atas nama dengan nilai nominal Rp100 (nilai penuh), dengan harga pelaksanaan Rp300 (nilai penuh) per lembar saham baru. Pada PUT III ini, sebanyak 500.013.138 lembar saham berhasil diserap, sehingga dana yang berhasil didapatkan adalah sebesar Rp150.003.941.400 (nilai penuh).

h. Penawaran Umum Terbatas IV

Pada tanggal 30 September 2020, telah dilaksanakan RUPSLB dan telah disepakati bahwa Bank akan melaksanakan Penawaran Umum Terbatas ("PUT") IV dengan Hak Memesan Efek Terlebih Dahulu kepada para pemegang saham dalam rangka penerbitan saham baru sebanyak-banyaknya 5.000.000.000 lembar saham baru.

1. GENERAL (continued)

f. Capital Increase Without Pre-Emptive Rights

On the EGMS dated June 27, 2018, the Bank's Shareholders have also agreed to conduct Capital Increase Without Pre-Emptive Rights ("PMTHMETD") for strategic investors with maximum amount of 469,591,963 new shares.

On March 22, 2019, the Bank has conducted PMTHMETD by issuing 469,591,963 new shares with a nominal value of Rp100 (full amount) per share and an exercise price of Rp338 (full amount) per share. The addition of shares is the result of additional capital by PT Akulaku Silvrr Indonesia. The funds received from this PMTHMETD amounted to Rp158,722,083,494 (full amount).

g. Limited Public Offering III

Based on the results of the EGMS dated June 28, 2019, the Bank's Shareholders agreed to conduct Limited Public Offering ("LPO") III with Pre-emptive Rights to shareholders to issue a maximum of 3,000,000,000 shares.

On June 18, 2020, the Bank received an effective statement from OJK through letter No. S-66/D.04/2020. During the LPO III, a maximum of 1,320,381,878 new shares were offered with a nominal value of Rp100 (full amount) with an exercise price of Rp300 (full amount) per new share. In this LPO III, shares amounting to 500,013,138 were successfully absorbed, as such the funds gathered amounted to Rp150,003,941,400 (full amount).

h. Limited Public Offering IV

On September 30, 2020, an EGMS was held and it was agreed that the Bank would conduct a Limited Public Offering ("LPO") IV with Pre-Emptive Rights to shareholders for the issuance of new shares at maximum of 5,000,000,000 new shares.

1. UMUM (lanjutan)

h. Penawaran Umum Terbatas IV (lanjutan)

Pada tanggal 31 Mei 2021, OJK mengeluarkan Surat Pernyataan Efektif atas Pelaksanaan PUT IV Bank melalui surat No.S-76/D.04/2021.

Dalam pelaksanaan PUT IV, Bank mengeluarkan sebanyak-banyaknya 832.724.404 lembar saham dengan nilai nominal Rp100 (nilai penuh) dan harga pelaksanaan Rp300 (nilai penuh) per lembar saham. Seluruh penerbitan saham baru Bank pada PUT IV ini terserap habis dengan total dana yang diterima sebesar Rp249.817.321.200 (nilai penuh).

i. Penawaran Umum Terbatas V

Pada tanggal 28 Mei 2021, telah dilaksanakan RUPSLB dan telah disepakati bahwa Bank akan melaksanakan Penawaran Umum Terbatas ("PUT") V dengan Hak Memesan Efek Terlebih Dahulu kepada para pemegang saham dalam rangka penerbitan saham baru sebanyak-banyaknya 5.000.000.000 lembar saham baru.

Pada tanggal 18 November 2021, OJK mengeluarkan Surat Pernyataan Efektif atas Pelaksanaan PUT V, melalui surat No. S-208/D.04/2021.

Pada pelaksanaan PUT V, Bank menerbitkan 1.927.162.193 lembar saham baru dengan nilai nominal Rp100 (nilai penuh) per lembar saham, dan harga pelaksanaan Rp1.300 (nilai penuh) per lembar saham. Seluruh penerbitan saham baru Bank pada PUT V ini terserap habis dengan total dana yang diterima oleh Bank sebanyak Rp2.505.310.850.900 (nilai penuh).

j. Penawaran Umum Terbatas VI

Pada tanggal 21 Juli 2022, telah dilaksanakan RUPSLB dan telah disepakati bahwa Bank akan melaksanakan Penawaran Umum Terbatas kepada para pemegang saham untuk Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu ("PMHMETD") VI dalam rangka penerbitan saham baru sebanyak-banyaknya 5.000.000.000 lembar saham baru.

Pada tanggal 10 November 2022, OJK mengeluarkan Surat Pernyataan Efektif atas Pelaksanaan PMHMETD VI, melalui surat No. S-235/D.04/2022.

1. GENERAL (continued)

h. Limited Public Offering IV (continued)

On May 31 2021, OJK issued effective letter for LPO IV through letter No. S-76/D.04/2021.

In the LPO IV, the Bank issued a maximum of 832,724,404 shares with nominal value of Rp100 (full amount) per share and exercise price of Rp300 (full amount) per share. All new shares issued by the Bank in this LPO IV were absorbed with total funds received amounting to Rp249,817,321,200 (full amount).

i. Limited Public Offering V

On May 28, 2021, an EGMS was held and it was agreed that the Bank would conduct a Limited Public Offering ("LPO") V with Pre-Emptive Rights to shareholders for the issuance of maximum of 5,000,000,000 new shares.

On November 18, 2021, OJK issued effective letter No. S-208/D.04/2021 for the implementation of LPO V.

In the implementation of LPO V, the Bank issued 1,927,162,193 shares with nominal value of Rp100 (full amount) per share and exercise price of Rp1,300 (full amount) per share. All new shares issued by the Bank in this LPO V were absorbed with total funds received amounting to Rp2,505,310,850,900 (full amount).

j. Limited Public Offering VI

On July 21, 2022, an EGMS was held and it was agreed that the Bank would conduct a Limited Public Offering to shareholders with Pre-Emptive Rights ("PMHMETD") VI for the issuance of maximum of 5,000,000,000 new shares.

On November 10, 2022, OJK issued effective letter No. S-235/D.04/2022 for the implementation of PMHMETD VI.

1. UMUM (lanjutan)

j. Penawaran Umum Terbatas VI (lanjutan)

Pada pelaksanaan PMHMETD VI, Bank menerbitkan 2.617.133.843 lembar saham baru dengan nilai nominal Rp100 (nilai penuh) per lembar saham dan harga pelaksanaan Rp650 (nilai penuh) per lembar saham. Seluruh penerbitan saham baru Bank pada PMHMETD VI ini terserap habis dengan total dana yang diterima oleh Bank sebanyak Rp1.701.136.997.950 (nilai penuh).

k. Penawaran Umum Terbatas VII

Pada tanggal 8 Agustus 2023, telah dilaksanakan RUPSLB dan telah disepakati bahwa Bank akan melaksanakan Penawaran Umum Terbatas kepada para pemegang saham untuk Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu ("PMHMETD") VII dalam rangka penerbitan saham baru sebanyak-banyaknya 5.000.000.000 lembar saham baru.

Pada tanggal 28 Juni 2024, OJK mengeluarkan Surat Pernyataan Efektif atas Pelaksanaan PMHMETD VII, melalui surat No. S-100/D.04/2024.

Pada pelaksanaan PMHMETD VII, Bank menerbitkan 1.311.666.667 lembar saham baru dengan nilai nominal Rp100 (nilai penuh) per lembar saham dan harga pelaksanaan Rp300 (nilai penuh) per lembar saham. Seluruh penerbitan saham baru Bank pada PMHMETD VII ini terserap habis dengan total dana yang diterima oleh Bank sebanyak Rp393.500.000.100 (nilai penuh).

l. Dewan Komisaris dan Direksi

Susunan pengurus Bank untuk periode 31 Desember 2025 dan 2024 adalah sebagai berikut:

1. GENERAL (continued)

j. Limited Public Offering VI (continued)

In the implementation of PMHMETD VI, the Bank issued 2,617,133,843 new shares with nominal value of Rp100 (full amount) per share and exercise price of Rp650 (full amount) per share. All new shares issued by the Bank in this PMHMETD VI were absorbed with total funds received amounting to Rp1,701,136,997,950 (full amount).

k. Limited Public Offering VII

On August 8, 2023, an EGMS was held and it was agreed that the Bank would conduct a Limited Public Offering to shareholders with Pre-Emptive Rights ("PMHMETD") VII for the issuance of maximum of 5,000,000,000 new shares.

On June 28, 2024, OJK issued effective letter No. S-100/D.04/2024 for the implementation of PMHMETD VII.

In the implementation of PMHMETD VII, the Bank issued 1,311,666,667 new shares with nominal value of Rp100 (full amount) per share and exercise price of Rp300 (full amount) per share. All new shares issued by the Bank in this PMHMETD VII were absorbed with total funds received amounting to Rp393,500,000,100 (full amount).

l. Boards of Commissioners and Directors

The composition of the Bank's Boards of Commissioners and Directors as of December 31, 2025 and 2024 are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Dewan Komisaris			***Board of Commissioners***
Komisaris Utama/ Independen	Inkawan D Jusi	Inkawan D Jusi	*President/ Independent Commissioner*
Komisaris	Kreisna Dewantara Gozali	Kreisna Dewantara Gozali*)	*Commissioner*
Komisaris Independen	Pramoda Dei Sudarmo	Pramoda Dei Sudarmo	*Independent Commissioner*
Direksi			***Board of Directors***
Direktur Utama	Eri Budiono	Eri Budiono**)	*President Director*
Direktur Bisnis	Aditya Wahyu Windarwo	Aditya Wahyu Windarwo	*Business Director*
Direktur Kepatuhan	Ricko Irwanto	Ricko Irwanto	*Compliance Director*

*) Efektif sejak 4 November 2024.
**) Efektif sejak 9 Agustus 2024.

*Effective since November 4, 2024. *)*
*Effective since August 9, 2024. **)*

1. UMUM (lanjutan)

m. Komite Audit

Susunan Komite Audit Bank pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Komite Audit			***Audit Committee***
Ketua	Pramoda Dei Sudarmo	Pramoda Dei Sudarmo	*Chairperson*
Anggota	Jusuf Sukiman***)	Mahdan Ibrahim*)	*Member*
Anggota	Johny Kandano	Johny Kandano**)	*Member*

*) Efektif sejak 18 Desember 2024.
**) Efektif sejak 15 Januari 2024.
***) Efektif sejak 4 Agustus 2025.

*Effective since December 18, 2024. *)*
*Effective since January 15, 2024. **)*
*Effective since August 4, 2025. ***)*

n. Kepala Divisi Audit Internal

Pada tanggal 31 Desember 2025 dan 2024, sesuai dengan POJK No. 1/POJK.03/2019 dan berdasarkan Surat Keputusan Direksi No. SKEP/296/HR/BNC/IV/2023 tanggal 3 April 2023, Direksi telah menunjuk Sdr. M. Syafril Maulana M sebagai Kepala Satuan Kerja Audit Intern.

o. Sekretaris Perusahaan

Pada tanggal 31 Desember 2025 dan 2024, sesuai dengan POJK No. 35/POJK.04/2014 dan berdasarkan Surat Keputusan Direksi No.SKEP/126/SET/BNC/X/2025 tanggal 4 Oktober 2025, Bank telah menunjuk Sdr. Erick Sanjaya Perkasa sebagai Pjs. Sekretaris Perusahaan.

Pada tanggal 31 Desember 2025 dan 2024, sesuai dengan POJK No. 35/POJK.04/2014 dan berdasarkan Surat Keputusan Direksi No. SKEP/184/SET/DIR/BYB/VIII/2020 tanggal 4 Agustus 2020, Bank telah menunjuk Sdri. Agnes Fibri Triliana Dewi untuk melaksanakan fungsi Sekretaris Perusahaan.

p. Total karyawan

Pada tanggal 31 Desember 2025 dan 2024, Bank memiliki karyawan masing-masing sebanyak 933 dan 1.208 (tidak diaudit).

Personel manajemen kunci adalah orang-orang yang mempunyai kewenangan dan tanggung jawab untuk merencanakan, memimpin dan mengendalikan aktivitas Bank, secara langsung atau tidak langsung, termasuk Direktur, Komisaris dan pejabat eksekutif dari Bank sesuai dengan peraturan Peraturan Otoritas Jasa Keuangan (POJK).

1. GENERAL (continued)

m. Audit Committee

The Bank's Audit Committee as of December 31, 2025 and 2024 is as follows:

n. Head of Internal Audit Division

As of December 31, 2025 and 2024, in accordance with the Regulation of Financial Services Authority No. 1/POJK.03/2019 and based on the Board of Directors' Decree as stated in Letter No. SKEP/296/HR/BNC/IV/2023 dated April 3, 2023, the Board of Directors has appointed Mr. M. Syafril Maulana M as the Head of Audit Intern Unit.

o. Corporate Secretary

As of December 31, 2025 and 2024, In accordance with the Regulation of Financial Services Authority No. 35/POJK.04/2014 and based on the Board of Directors' Decree as stated in Letter No. SKEP/126/SET/BNC/X/2025 dated October 4, 2025, the Bank has appointed Mr. Erick Sanjaya Perkasa as the Act. Corporate Secretary.

As of December 31, 2025 and 2024, In accordance with the Regulation of Financial Services Authority No. 35/POJK.04/2014 and based on the Board of Directors' Decree as stated in Letter No. SKEP/184/SET/DIR/BYB/VIII/2020 dated August 4, 2020, the Bank has appointed Ms. Agnes Fibri Triliana Dewi to carry out the Corporate Secretary functions.

p. Number of employees

As of December 31, 2025 and 2024, the Bank has 933 and 1,208 employees, respectively (unaudited).

Key management personnel are those people who have the authority and responsibility to plan, lead and control the activities of the Bank, directly or indirectly. Key management personnel are the Directors, Commissioners and executive employees of the Bank according to Financial Services Authority Regulation (POJK).

1. UMUM (lanjutan)

Manajemen Bank bertanggung jawab atas penyusunan dan penyajian wajar keuangan ini sesuai dengan Standar Akuntansi Keuangan di Indonesia, yang telah diselesaikan dan diotorisasi untuk diterbitkan oleh Direksi Bank pada tanggal 30 Maret 2026.

1. GENERAL (continued)

The Bank's management is responsible for the preparation and fair presentation of these financial statements in accordance with Indonesian Financial Accounting Standards, which were completed and authorized for issuance by the Board of Directors of the Bank on March 30, 2026.

2. PERUBAHAN KEBIJAKAN AKUNTANSI

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.

PSAK 117: "Kontrak Asuransi"

Standar akuntansi baru yang komprehensif untuk kontrak asuransi yang mencakup pengakuan dan pengukuran, penyajian dan pengungkapan, pada saat berlaku efektif PSAK 117 akan menggantikan PSAK 104: Kontrak Asuransi. PSAK 117 berlaku untuk semua jenis kontrak asuransi, jiwa, non-jiwa, asuransi langsung dan reasuransi, terlepas dari entitas yang menerbitkannya, serta untuk jaminan dan instrumen keuangan tertentu dengan fitur partisipasi tidak mengikat, serta beberapa pengecualian ruang lingkup akan berlaku. Tujuan keseluruhan dari PSAK 117 adalah untuk menyediakan model akuntansi untuk kontrak asuransi yang lebih bermanfaat dan konsisten untuk asuradur.

PSAK 117 berlaku efektif untuk periode pelaporan yang dimulai pada atau setelah tanggal 1 Januari 2025, dengan mensyaratkan angka komparatif. Penerapan dini diperkenankan bila entitas juga menerapkan PSAK 109 dan PSAK 115 pada atau sebelum tanggal penerapan awal PSAK 117. Standar ini tidak diharapkan memiliki dampak pada pelaporan keuangan Bank pada saat diadopsi untuk pertama kali.

2. CHANGES IN ACCOUNTING PRINCIPLES

The Bank initially adopted 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 statements:

Amendment of PSAK 221: "Lack of Exchangeability"

The amendments require disclosure of information that enables users 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 January 1, 2025. Earlier application is permitted which an entity is required to disclose that fact.

SFAS 117: "Insurance Contracts"

A comprehensive new accounting standard for insurance contracts covering recognition and measurement, presentation and disclosure, upon its effective date, SFAS 117 will replace SFAS 104: Insurance Contracts. SFAS 117 applies to all types of insurance contracts, life, non-life, direct insurance and reinsurance, regardless of the entities issuing them, as well as to certain guarantees and financial instruments with discretionary participation features, while a few scope exceptions will apply. The overall objective of SFAS 117 is to provide an accounting model for insurance contracts that is more useful and consistent for insurers.

SFAS 117 is effective for reporting periods beginning on or after January 1, 2025, with comparative figures required. Early application is permitted, provided the entity also applies SFAS 109 and SFAS 115 on or before the date of initial application of SFAS 117. This standard is not expected to have any impact to the financial reporting of the Bank upon first-time adoption.

2. PERUBAHAN KEBIJAKAN AKUNTANSI (lanjutan)

Penerapan PSAK di atas tidak berdampak material terhadap pelaporan keuangan dan pengungkapan dalam laporan keuangan.

2. CHANGES IN ACCOUNTING PRINCIPLES (continued)

The implementation of SFAS above does not cause significant change to the financial reporting and disclosure in the financial statements.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut:

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows:

a. Pernyataan kepatuhan terhadap Standar Akuntansi Keuangan (SAK)

Laporan keuangan telah disusun dan disajikan sesuai dengan Standar Akuntansi Keuangan di Indonesia yang dikeluarkan oleh Ikatan Akuntan Indonesia dan Peraturan Regulator Pasar Modal yaitu Peraturan No. VIII.G.7 tentang "Penyajian dan Pengungkapan Laporan Keuangan Emiten atau Perusahaan Publik".

a. Statement of compliance with Financial Accounting Standards (FAS)

The financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards issued by the Indonesian Institute of Accountants and Capital Market Regulator of Regulation No. VIII.G.7 related to "Presentation and Disclosure of Financial Statements of Listed Companies or Public Companies".

b. Dasar penyajian laporan keuangan

Laporan keuangan Bank disusun dan disajikan berdasarkan Standar Akuntansi Keuangan di Indonesia, yang mencakup Pernyataan dan Interpretasi yang dikeluarkan oleh Dewan Standar Akuntansi Keuangan Ikatan Akuntan Indonesia (DSAK IAI) dan peraturan-peraturan serta pedoman penyajian dan pengungkapan laporan keuangan yang diterbitkan oleh Otoritas Jasa Keuangan (OJK).

Laporan keuangan disusun berdasarkan konsep akrual kecuali laporan arus kas, dengan menggunakan konsep biaya historis, kecuali seperti disebutkan dalam catatan atas laporan keuangan yang relevan.

Laporan arus kas yang disajikan menggunakan metode langsung, menyajikan penerimaan dan pengeluaran kas dan setara kas yang diklasifikasi ke 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 dan penempatan pada Bank Indonesia dan bank lain yang jatuh tempo dalam waktu 3 (tiga) bulan sejak tanggal perolehan, sepanjang tidak digunakan sebagai jaminan atas pinjaman yang diterima serta tidak dibatasi penggunaannya.

b. Basis of presentation of financial statements

The Bank's financial statements have been prepared and presented in accordance with Indonesian Financial Accounting Standards, including Standards and Interpretations issued by the Financial Accounting Standards Board of the Indonesian Institute of Accountants (Dewan Standar Akuntansi Indonesia or DSAK IAI) and the regulations and guidelines on financial statement presentation and disclosures issued by Financial Services Authority (Otoritas Jasa Keuangan or OJK).

Financial statements have been prepared in accordance with accrual concept except the statements of cash flows which have been prepared with historical concept, unless stated in relevant notes.

The statements of cash flows which have been prepared using direct method, present receipts and disbursement of cash and cash equivalents classified into operating, investing and financing activities. For the purpose of statements of cash flows, cash and cash equivalents include cash, current accounts in Bank Indonesia, current accounts in other banks and placements in Bank Indonesia and other banks that mature within 3 (three) months from acquisition date, and not being pledged as collateral for borrowings nor restricted.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

b. Dasar penyajian laporan keuangan (lanjutan)

Pos-pos dalam penghasilan komprehensif lainnya disajikan terpisah antara akun-akun yang akan direklasifikasikan ke laba rugi dan akun-akun yang tidak akan direklasifikasikan ke laba rugi.

Kebijakan akuntansi yang diterapkan adalah selaras bagi tahun yang dicakup oleh laporan keuangan, kecuali untuk standar akuntansi baru dan revisi seperti diungkapkan pada Catatan 2.

Laporan keuangan disajikan dalam mata uang Rupiah ("Rp"), yang merupakan mata uang fungsional dan penyajian Bank. Seluruh angka dalam laporan keuangan ini disajikan dalam jutaan Rupiah, kecuali dinyatakan lain.

c. Transaksi dengan pihak berelasi

Bank melakukan transaksi dengan pihak-pihak berelasi. Dalam laporan keuangan ini, istilah pihak berelasi sesuai dengan PSAK 224 (revisi 2015) tentang "Pengungkapan Pihak-pihak Berelasi" (dahulu PSAK 7).

Pihak berelasi adalah orang atau entitas yang terkait dengan Bank:

1) Orang atau anggota keluarga terdekat mempunyai relasi dengan Bank jika orang tersebut:
   i) memiliki pengendalian atau pengendalian bersama atas Bank;
   ii) memiliki pengaruh signifikan atas Bank; atau
   iii) personel manajemen kunci Bank atau entitas induk Bank.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

b. Basis of presentation of financial statements (continued)

Items within other comprehensive income are classified separately, between accounts which will be reclassified to profit or loss and which will not be reclassified to profit or loss.

The accounting policies adopted are consistently applied for the years covered by the financial statements, except for new and revised accounting standards as disclosed in the Note 2.

The financial statements are presented in Rupiah ("Rp"), which is the functional and presentation currency of the Bank. Figures in these financial statements are presented in millions of Indonesian Rupiah, unless otherwise stated.

c. Transactions with related parties

The Bank enters into transactions with related parties. In these financial statements, the term related parties are defined in accordance with under SFAS 224 (revised 2015) on "Related Parties Disclosures" (previously SFAS 7).

Related parties are persons or entities related to the Bank:

1) A person or family member is closely related to the Bank if the person:
   i) has joint control or control over the Bank;
   ii) has significant influence over the Bank; or
   iii) is the key management personnel of the Bank or the Bank's parent.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

d. Transaksi dengan pihak berelasi (lanjutan)

Pihak berelasi adalah orang atau entitas yang terkait dengan Bank: (lanjutan)

2) Suatu entitas berelasi dengan Bank jika memenuhi salah satu hal berikut:
   (i) Entitas dan Bank adalah anggota dari kelompok usaha yang sama.
   (ii) Suatu entitas adalah entitas asosiasi atau ventura bersama dari entitas lain (atau entitas asosiasi atau ventura bersama yang merupakan anggota suatu kelompok usaha, yang mana entitas lain tersebut adalah anggotanya).
   (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 Bank atau entitas yang terkait dengan Bank. Jika Bank adalah entitas yang menyelenggarakan program tersebut, maka entitas sponsor juga berelasi dengan Bank.
   (vi) Entitas yang dikendalikan atau dikendalikan bersama oleh orang yang diidentifikasi dalam nomor (1).
   (vii) Orang yang diidentifikasi dalam butir (1) (i) memiliki pengaruh signifikan atas entitas atau merupakan personel manajemen kunci entitas (atau entitas induk dari entitas).
   (viii) Entitas, atau anggota dari kelompok di mana entitas merupakan bagian dari kelompok tersebut, menyediakan jasa personel manajemen kunci kepada entitas pelapor atau kepada entitas induk dari entitas pelapor.

Seluruh transaksi signifikan dengan pihak berelasi diungkapkan dalam laporan keuangan (Catatan 36).

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

c. Transactions with related parties (continued)

Related parties are persons or entities related to the Bank: (continued)

2) A related entity with the Bank if it meets one of the following:
   (i) Entities and the Bank are members of the same business group.
   (ii) An entity is an associate or joint venture of another entity (or an associate or joint venture entity that is a member of a business group, of which the other entity is a member).
   (iii) Both entities are joint ventures of the same third party.
   (iv) An entity is a joint venture of a third entity and the other entity is an associate entity of the third entity.
   (v) Such an entity is a post-employment benefit plan for the employee benefits of the Bank or entities related to the Bank. If the Bank is the entity that organizes the program, then the sponsoring entity also relates to the Bank.
   (vi) Entities controlled or jointly controlled by persons identified in number (1).
   (vii) Persons identified in point (1) (i) have significant influence over the entity or are the key management personnel of the entity (or a parent of the entity).
   (viii) An entity, or any member of a group of which it is a part, that provides key management personnel services to the reporting entity or its parent.

All significant transactions with related parties are disclosed in the financial statements. (Note 36).

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

d. Pelaporan segmen

Bank melaporkan informasi segmen yang memungkinkan pengguna laporan keuangan untuk mengevaluasi sifat dan dampak keuangan dari aktivitas bisnis yang melibatkan Bank dan lingkungan ekonomi dimana Bank beroperasi.

Sebuah segmen operasi adalah sebuah komponen dari entitas yang:

- terlibat dalam aktivitas bisnis yang mana memperoleh pendapatan dan menimbulkan beban (termasuk pendapatan dan beban terkait dengan transaksi dengan komponen lain dari bank yang sama);
- hasil operasinya dikaji ulang secara reguler oleh pengambil keputusan operasional untuk membuat keputusan tentang sumber daya yang dialokasikan pada segmen tersebut dan menilai kinerjanya; dan
- tersedia informasi keuangan yang dapat dipisahkan.

Bank melakukan segmentasi pelaporan berdasarkan informasi keuangan yang digunakan oleh pengambil keputusan operasional dalam mengevaluasi kinerja segmen dan menentukan alokasi sumber daya yang dimilikinya. Segmentasi juga dilakukan berdasarkan aktivitas dari setiap kegiatan operasi Bank. Pelaporan segmen telah diungkapkan pada Catatan 37.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

d. Segment reporting

The Bank discloses segment information that will enable users of financial statements to evaluate the nature and financial effects of the business activities in which the Bank engages with and the economic environment in which the Bank operates.

An operating segment is a component of an entity:

- *that engages in business activities in which it may earn revenue and incur expenses (including revenues and expenses relating to the transaction with other components of the same bank);*
- *whose operating results are reviewed regularly by the entity's chief operating decision maker to make decision about resources to be allocated to the segments and assess its performance; and*
- *for which discrete financial information is available.*

Segment reporting made by the Bank is based on the financial information used by operating decision makers in evaluating operating segment performance and determining the allocation of its resources. Segmentation is also based on the activity of each operating activities in the Bank. Segment reporting has been disclosed in Note 37.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan

1. Klasifikasi

Bank mengklasifikasikan aset keuangannya berdasarkan kategori sebagai berikut pada saat pengakuan awal:

a. aset keuangan yang diukur pada nilai wajar melalui laba rugi;
b. aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain;
c. aset keuangan yang diukur pada biaya perolehan diamortisasi.

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 diukur pada biaya perolehan diamortisasi jika memenuhi kondisi sebagai berikut:

a. aset keuangan dikelola dalam model bisnis yang bertujuan untuk memiliki aset keuangan dalam rangka mendapatkan arus kas kontraktual; dan

b. persyaratan kontraktual dari aset keuangan tersebut memberikan hak pada tanggal tertentu atas arus kas yang diperoleh semata dari pembayaran pokok dan bunga ("SPPI") dari jumlah pokok terutang.

Aset keuangan diukur pada nilai wajar melalui penghasilan komprehensif lain jika memenuhi kondisi sebagai berikut:

a. aset keuangan dikelola dalam model bisnis yang bertujuan untuk mendapatkan arus kas kontraktual dan menjual aset keuangan; dan
b. persyaratan kontraktual dari aset keuangan tersebut memenuhi kriteria SPPI.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities

1. Classification

The Bank classifies its financial assets according to the following categories at initial recognition:

a. financial assets measured at fair value through profit or loss;
b. financial assets measured at fair value through other comprehensive income;

c. financial assets measured at amortised cost.

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 particular business objective.

Financial assets are measured at amortised cost if they meet the following conditions:

a. financial assets are managed in a business model that aims to have financial assets in order to obtain contractual cash flows; and

b. the contractual terms of the financial asset provide rights on a certain date for cash flows obtained solely from payment of principal and interest ("SPPI") on the principal amount owed.

Financial assets are measured at fair value through other comprehensive income if they meet the following conditions:

a. financial assets are managed in a business model that aims to collect contractual cash flows and selling the financial assets; and
b. the contractual requirements of the financial assets meet the SPPI criteria.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

1. Klasifikasi (lanjutan)

Pada saat pengakuan awal, Bank dapat membuat pilihan yang tidak dapat dibatalkan untuk menyajikan instrumen ekuitas yang bukan dimiliki untuk diperdagangkan pada nilai wajar melalui penghasilan komprehensif lain.

Aset keuangan lainnya yang tidak memenuhi persyaratan untuk diklasifikasikan sebagai aset keuangan diukur pada biaya perolehan diamortisasi atau nilai wajar melalui penghasilan komprehensif lain, diklasifikasikan sebagai diukur pada nilai wajar melalui laba rugi.

Saat pengakuan awal Bank dapat membuat penetapan yang tidak dapat dibatalkan untuk mengukur aset yang memenuhi persyaratan untuk diukur pada biaya perolehan diamortisasi atau nilai wajar melalui penghasilan komprehensif lain atau pada nilai wajar melalui laba rugi, apabila penetapan tersebut mengeliminasi atau secara signifikan mengurangi inkonsistensi pengukuran atau pengakuan (kadang disebut sebagai "*accounting mismatch*").

Penilaian bisnis model

Model bisnis ditentukan pada level yang mencerminkan bagaimana kelompok aset keuangan dikelola bersama-sama untuk mencapai tujuan bisnis tertentu.

Penilaian model bisnis dilakukan dengan mempertimbangkan, tetapi tidak terbatas pada, hal-hal berikut:

a. Bagaimana kinerja dari model bisnis dan aset keuangan yang dimiliki dalam model bisnis dievaluasi dan dilaporkan kepada personel manajemen kunci Bank;

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

1. Classification (continued)

At initial recognition, the Bank may make an irrevocable choice to present equity instruments that are not held for trading at fair value through other comprehensive income.

Other financial assets that do not meet the requirements to be classified as financial assets measured at amortised cost or fair value through other comprehensive income, are classified as measured at fair value through profit or loss.

At initial recognition, the Bank can make an irrevocable determination to measure assets that meet the requirements to be measured at amortised cost or fair value through other comprehensive income or at fair value through profit or loss, if the determination eliminates or significantly reduces the measurement or recognition inconsistencies (sometimes referred to as "accounting mismatch").

Evaluation of business model

The business model is determined at a level that reflects how groups of financial assets are managed together to achieve certain business objectives.

The evaluation of the business model is carried out by considering, but not limited to, the following:

a. How the performance of the business model and financial assets held in the business model are evaluated and reported to the Bank's key management personnel;

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

1. Klasifikasi (lanjutan)

Penilaian bisnis model (lanjutan)

Penilaian model bisnis dilakukan dengan mempertimbangkan, tetapi tidak terbatas pada, hal-hal berikut: (lanjutan)

b. Apakah risiko yang mempengaruhi kinerja dari model bisnis (termasuk aset keuangan yang dimiliki dalam model bisnis) dan khususnya bagaimana cara aset keuangan tersebut dikelola; dan

c. Bagaimana penilaian kinerja pengelola aset keuangan (sebagai contoh, apakah penilaian kinerja berdasarkan nilai wajar dari aset yang dikelola atau arus kas kontraktual yang diperoleh).

Aset keuangan yang dimiliki untuk diperdagangkan atau dikelola dan penilaian kinerjanya berdasarkan nilai wajar diukur pada nilai wajar melalui laba rugi.

Derivatif juga dikategorikan dalam kelompok ini, kecuali derivatif yang ditetapkan sebagai instrumen lindung nilai efektif.

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga ("SPPI")

Untuk tujuan penilaian ini, pokok didefinisikan sebagai nilai wajar dari aset keuangan pada saat pengakuan awal. Bunga didefinisikan sebagai imbalan untuk nilai waktu atas uang dan risiko kredit terkait jumlah pokok terutang pada periode waktu tertentu dan juga risiko lainnya dan biaya peminjaman standar, dan juga margin laba.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

1. Classification (continued)

Evaluation of business model (continued)

The evaluation of the business model is carried out by considering, but not limited to, the following: (continued)

b. What risks affect the performance of the business model (including financial assets held in the business model) and specifically how the financial assets are managed; and

c. How to evaluate the performance of managers of financial assets (for example, whether performance appraisals are based on the fair value of the assets being managed or the contractual cash flows obtained).

Financial assets held for trading or managed and which performance appraisals based on fair value are measured at fair value through profit or loss.

Derivatives are also categorized under this classification unless they are designated as effective hedging instruments.

Evaluation of contractual cash flows obtained solely from payment of principal and interest ("SPPI")

For the purpose of this evaluation, principal is defined as the fair value of financial assets at initial recognition. Interest is defined as compensation for the time value of money and credit risk in relation to the principal amount owed over a certain period of time and also other risk and standard borrowing costs, as well as profit margins.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

1. Klasifikasi (lanjutan)

Penilaian bisnis model (lanjutan)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga ("SPPI") (lanjutan)

Penilaian mengenai arus kas kontraktual yang diperoleh semata dari pembayaran pokok dan bunga dilakukan dengan mempertimbangkan persyaratan kontraktual, termasuk apakah aset keuangan mengandung persyaratan kontraktual yang dapat mengubah waktu atau jumlah arus kas kontraktual. Dalam melakukan penilaian, Bank mempertimbangkan:

a. Peristiwa kontinjensi yang akan mengubah waktu atau jumlah arus kas kontraktual;
b. Fitur *leverage*;
c. Persyaratan pembayaran dimuka dan perpanjangan kontraktual;
d. Persyaratan mengenai klaim yang terbatas atas arus kas yang berasal dari aset spesifik; dan
e. Fitur yang dapat mengubah nilai waktu dari elemen uang.

Bank mengklasifikasikan liabilitas keuangan dalam kategori liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi. Bank tidak memiliki liabilitas keuangan yang diukur pada nilai wajar melalui laba rugi.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

1. Classification (continued)

Evaluation of business model (continued)

Evaluation of contractual cash flows obtained solely from payment of principal and interest ("SPPI") (continued)

An assessment of contractual cash flows obtained solely from principal and interest payments is made by considering contractual terms, including whether financial assets contain contractual terms that can change the timing or amount of contractual cash flows. In assessing, the Bank considers:

a. Contingency events that will change the timing or amount of contractual cash flow;
b. Leverage feature;
c. Terms of advance payment and contractual extension;
d. Requirements regarding limited claims for cash flows from specific assets; and
e. Features that can change the time value of the money element.

The Bank classified its financial liabilities in the category of financial liabilities measured at amortized cost. The Bank does not have financial liabilities at fair value through profit or loss.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

1. Klasifikasi (lanjutan)

Dibawah ini merupakan klasifikasi instrumen keuangan yang dimiliki Bank:

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

1. Classification (continued)

Set out below is the classification of the Bank's financial instruments:

Instrumen keuangan/ ***Financial instrumenst***	**Kategori yang didefinisikan oleh PSAK 109 (dahulu PSAK 71)/** ***Category as defined by SFAS 109 (previously SFAS 71)***	**Golongan/** ***Class***	**Subgolongan/** ***Subclasses***
Aset keuangan/ *Financial assets*	Biaya perolehan diamortisasi/ *Amortised cost*	Kas/*Cash*	
		Giro pada Bank Indonesia dan giro pada bank lain/ *Current accounts with Bank Indonesia and current accounts with other banks*	
		Penempatan pada Bank Indonesia dan bank lain/ *Placements with Bank Indonesia and other banks*	
		Efek-efek/*Marketable securities*	
		Kredit yang diberikan/*Loans*	
		Efek-efek yang dibeli dengan janji dijual kembali/ *Securities purchased under agreements to resell*	
		Aset lain-lain/*Other assets*	Tagihan terkait pembayaran kredit *channeling* dan *direct*/*Receivables related to channeling and direct loans repayment*
			Tagihan gerbang pembayaran/ *Receivables from payment gateway*
			Tagihan ATM Bersama, Alto dan Prima/ *Receivables from ATM Bersama, Alto and Prima*
			Piutang asuransi/ *Insurance receivables*
			Piutang bunga/ *Interest receivables*
			Setoran jaminan/ *Guarantee deposit*
			Tagihan lain/ *Other receivables*
Aset keuangan/ *Financial assets*	Nilai wajar melalui penghasilan komprehensif lain/ *Fair value through other comprehensive income*	Efek-efek/*Marketable securities*	
Liabilitas keuangan/ *Financial liabilities*	Biaya perolehan diamortisasi/ *Amortised cost*	Liabilitas segera/*Liabilities due immediately*	
		Simpanan nasabah dan simpanan dari bank lain/ *Deposits from customers and deposits from other banks*	
		Liabilitas sewa/*Lease liabilities*	
		Liabilitas lain-lain/*Other liabilities*	Beban yang masih harus dibayar/ *Accrued expenses*
			Cadangan biaya umum/*General accrued expense*
			Pendapatan diterima dimuka/*Advances payable*
			Angsuran kredit diterima dimuka/*Loan installments received in advance*
			Biaya layanan dan komisi yang masih harus dibayar/*Accrued services and commissions fee*
			Biaya asuransi kredit yang masih harus dibayar/*Accrued loan insurance expenses*
			Lainnya/*Others*
Komitmen dan kontinjensi instrumen keuangan/*Commitment and contingency financial instruments*	Komitmen dan kontinjensi instrumen keuangan/*Commitment and contingency financial instruments*	Piutang bunga atas kredit bermasalah/*Interest receivables on non performing loans*	
		Fasilitas kredit yang diberikan yang belum digunakan/ *Unused loan facilities*	

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

2. Pengakuan awal

Bank pada awalnya mengakui transaksi keuangan pada tanggal dimana Bank menjadi suatu pihak dalam perjanjian kontraktual instrumen tersebut. Pembelian dan penjualan aset keuangan yang lazim (*regular*) diakui pada tanggal perdagangan.

Pada saat pengakuan awal, aset keuangan atau 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 aset keuangan atau penerbitan liabilitas keuangan. Pengukuran aset keuangan dan liabilitas keuangan setelah pengakuan awal tergantung pada klasifikasi aset keuangan dan liabilitas keuangan tersebut.

Biaya transaksi hanya meliputi biaya-biaya yang dapat diatribusikan secara langsung untuk perolehan suatu aset keuangan atau penerbitan suatu liabilitas keuangan dan merupakan biaya tambahan yang tidak akan terjadi apabila instrumen keuangan tersebut tidak diperoleh atau diterbitkan.

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. Aset keuangan yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan aset keuangan yang diukur pada nilai wajar melalui laporan laba rugi selanjutnya dicatat sebagai nilai wajar. Aset keuangan yang diklasifikasikan sebagai biaya perolehan diamortisasi dicatat sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

2. Initial recognition

The Bank initially recognises financial instrument transactions on the date at which the Bank becomes a party to the contractual agreement of the instrument. Regular purchases and sales of financial assets are recognised on the trade date.

At initial recognition, a financial asset or 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 assets acquisition or financial liabilities issuance. The subsequent measurement of financial assets and financial liabilities depends on their classification.

Transaction costs only include those costs that are directly attributable to the acquisition of a financial asset or 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 assets measured at fair value through profit or loss are initially recognised at fair value, and transaction costs are expensed in the profit or loss. Financial assets measured at fair value through other comprehensive and financial assets measured at fair value through profit or loss are subsequently measured at fair value. Financial assets classified as amortised cost are measured at amortised cost using the effective interest rate method.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

2. Pengakuan awal (lanjutan)

Liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi

Pada saat pengakuan awal, liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi diukur pada nilai wajar dikurangi biaya transaksi (jika ada).

Setelah pengakuan awal, Bank mengukur seluruh liabilitas keuangan yang diukur dengan biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif. Amortisasi suku bunga efektif diakui sebagai "beban bunga".

3. Penghentian pengakuan

Aset dan liabilitas keuangan dihentikan pengakuannya ketika hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir.

a. Aset keuangan dihentikan pengakuannya ketika:

(1) Hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir; atau
(2) Bank telah mentransfer haknya untuk menerima arus kas yang berasal dari aset tersebut atau menanggung liabilitas untuk membayarkan arus kas yang diterima tersebut secara penuh tanpa penundaan berarti kepada pihak ketiga dibawah kesepakatan pelepasan, dan antara (a) Bank telah mentransfer secara substansial seluruh risiko dan manfaat atas aset, atau (b) Bank tidak mentransfer maupun tidak memiliki secara substansial seluruh risiko dan manfaat atas aset, tetapi telah mentransfer kendali atas aset.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

2. Initial recognition (continued)

Financial liabilities measured at amortized cost

Financial liabilities measured at amortized cost are initially recognized at fair value minus transactions cost (if any).

After initial recognition, the Bank measures all financial liabilities measured at amortized cost using effective interest rates method. Effective interest rate amortization is recognized as "interest expenses".

3. Derecognition

Financial assets and liabilities are derecognized when the contractual rights to receive cash flows from the financial assets have expired.

a. Financial assets are derecognised when:

(1) The contractual rights to receive cash flows from the financial assets have expired; or
(2) The Bank has transferred its rights to receive cash flows from the asset or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a 'pass-through' arrangement; and either (a) the Bank has transferred substantially all the risks and rewards of the asset, or (b) the Bank has neither transferred nor retained substantially all the risks and rewards of the asset, but has transferred control of the asset.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

3. Penghentian pengakuan (lanjutan)

Aset dan liabilitas keuangan dihentikan pengakuannya ketika hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir. (lanjutan)

a. Aset keuangan dihentikan pengakuannya ketika: (lanjutan)

Ketika Bank telah mentransfer hak untuk menerima arus kas dari aset atau telah memasuki kesepakatan pelepasan dan tidak mentransfer serta tidak mempertahankan secara substansial seluruh risiko dan manfaat atas aset atau tidak mentransfer kendali atas aset, aset diakui sebesar keterlibatan Bank yang berkelanjutan atas aset tersebut.

Kredit yang diberikan dihapusbukukan ketika tidak terdapat prospek yang realistis mengenai pengembalian pinjaman atau hubungan normal antara Bank dan debitur telah berakhir. Pinjaman yang tidak dapat dilunasi tersebut dihapusbukukan dengan mendebit penyisihan kerugian penurunan nilai.

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan dicatat sebagai pendapatan operasional lainnya pada laporan laba rugi dan penghasilan komprehensif lain.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

3. Derecognition (continued)

Financial assets and liabilities are derecognized when the contractual rights to receive cash flows from the financial assets have expired. (continued)

a. Financial assets are derecognised when: (continued)

When the Bank has transferred its rights to receive cash flows from an asset or has entered into a passthrough arrangement and has neither transferred nor retained substantially all the risks and rewards of the asset nor transferred control of the asset, the asset is recognised to the extent of the Bank's continuing involvement in the asset.

Loans are written-off when there is no realistic prospect of collection in the near future or the normal relationship between the Bank and the borrowers has ceased to exist. When a loan is deemed uncollectible, it is written-off against the related allowance for impairment losses.

Subsequent recoveries from financial assets which were written-off are recorded as other operating income in the statements of profit or loss and other comprehensive income.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

3. Penghentian pengakuan (lanjutan)

Aset dan liabilitas keuangan dihentikan pengakuannya ketika hak kontraktual atas arus kas yang berasal dari aset keuangan tersebut berakhir. (lanjutan)

b. 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.

4. Pengakuan pendapatan dan beban

a. Pendapatan dan beban bunga, untuk aset nilai wajar melalui penghasilan komprehensif lain serta aset keuangan dan liabilitas keuangan yang dicatat berdasarkan biaya perolehan diamortisasi, diakui pada laporan laba rugi dan penghasilan komprehensif lain dengan menggunakan suku bunga efektif.

Jumlah tercatat bruto aset keuangan adalah biaya perolehan diamortisasi aset keuangan sebelum disesuaikan dengan cadangan penurunan nilai.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

3. Derecognition (continued)

Financial assets and liabilities are derecognized when the contractual rights to receive cash flows from the financial assets have expired. (continued)

b. 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.

4. Income and expense recognition

a. For fair value through other comprehensive income securities and financial assets and liabilities held at amortised cost, interest income and interest expense is recognized in the statements of profit or loss and other comprehensive income using the effective interest rate method.

The gross carrying amount of a financial asset is the amortised cost of a financial asset before adjusting for allowance for impairment.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

4. Pengakuan pendapatan dan beban (lanjutan)

Dalam menghitung pendapatan dan beban bunga, tingkat bunga efektif diterapkan pada jumlah tercatat bruto aset (ketika aset tersebut bukan aset keuangan memburuk) atau terhadap biaya perolehan diamortisasi dari liabilitas.

b. Untuk aset keuangan yang memburuk setelah pengakuan awal, pendapatan bunga dihitung dengan menerapkan tingkat bunga efektif terhadap biaya perolehan diamortisasi dari aset keuangan tersebut. Jika aset tersebut tidak lagi memburuk, maka perhitungan pendapatan bunga akan dihitung dengan menerapkan tingkat bunga efektif terhadap nilai tercatat bruto dari aset keuangan tersebut.

c. Keuntungan dan kerugian yang timbul dari perubahan nilai wajar atas aset keuangan dalam kelompok nilai wajar melalui penghasilan komprehensif lain diakui secara langsung dalam laporan laba rugi komprehensif (merupakan bagian dari ekuitas) sampai aset keuangan tersebut dihentikan pengakuannya atau adanya penurunan nilai, kecuali keuntungan atau kerugian akibat perubahan nilai tukar untuk instrumen utang.

Pada saat aset keuangan dihentikan pengakuannya atau dilakukan penurunan nilai, keuntungan atau kerugian kumulatif yang sebelumnya diakui dalam ekuitas harus diakui pada laporan laba rugi dan penghasilan komprehensif lain.

5. Reklasifikasi instrumen keuangan

Bank mereklasifikasi aset keuangan jika dan hanya jika, model bisnis untuk pengelolaan aset keuangan berubah.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

4. Income and expense recognition (continued)

In calculating interest income and expenses, the effective interest rate is applied to the gross carrying amount of an asset (when the asset is not a deteriorated financial asset) or to the amortised cost of a liability.

b. For financial assets that deteriorated after initial recognition, interest income is calculated by applying an effective interest rate to the amortised cost of the financial assets. If the asset no longer deteriorates, the calculation of interest income will be calculated by applying an effective interest rate to the gross carrying amount of the financial asset.

c. Gains and losses arising from changes in the fair value of fair value through other comprehensive income financial assets are recognised directly in other comprehensive income (as part of equity), until the financial asset is derecognised or impaired, except gain or loss arising from changes in exchanges rate for debt instrument.

When a financial asset is derecognised or impaired, the cumulative gains or losses previously recognised in equity are recognised in profit or loss and other comprehensive income.

5. Reclassification of financial instruments

The Bank reclassifies financial assets if and only if, the business model for managing financial assets changes.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

5. Reklasifikasi instrumen keuangan (lanjutan)

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 tidak diperkenankan untuk mereklasifikasi liabilitas keuangan.

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.
c. pengalihan aset keuangan antara bagian dari Bank dengan model bisnis berbeda.

6. Saling hapus

Aset dan liabilitas keuangan dapat saling hapus dan nilai bersihnya disajikan dalam laporan posisi keuangan jika, dan hanya jika, Bank memiliki hak yang berkekuatan hukum untuk melakukan saling hapus atas jumlah yang telah diakui tersebut dan berniat untuk menyelesaikan secara neto atau untuk merealisasikan aset dan menyelesaikan liabilitasnya secara bersamaan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

5. Reclassification of financial instruments (continued)

The characteristic of business model changes must significantly impact to the Bank's 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 is not permitted to reclassify financial liabilities.

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.
c. transfer of financial asset between intra-Bank transfer of financial asset with different business model.

6. Offsetting

Financial assets and liabilities are offset and the net amount is presented in the statements of financial position when, and only when, the Bank has a legal right to off-set the amounts and intends either to settle on a net basis or to realize the asset and settle the liability simultaneously.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

6. Saling hapus (lanjutan)

Hak saling hapus tidak kontinjen atas peristiwa di masa depan dan dapat dipaksakan secara hukum dalam situasi bisnis yang normal dan dalam peristiwa gagal bayar, atau peristiwa kepailitan atau kebangkrutan Bank atau pihak lawan.

Pendapatan dan beban disajikan dalam jumlah bersih hanya jika diperkenankan oleh standar akuntansi.

7. Pengukuran biaya perolehan diamortisasi

Biaya perolehan diamortisasi dari aset keuangan atau liabilitas keuangan adalah jumlah aset keuangan atau liabilitas keuangan yang diukur pada saat pengakuan awal dikurangi pembayaran pokok, ditambah atau dikurangi dengan amortisasi kumulatif menggunakan metode suku bunga efektif yang dihitung dari selisih antara nilai awal dan nilai jatuh temponya, dan untuk aset keuangan, disesuaikan dengan cadangan kerugian penurunan nilai.

8. Pengukuran 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 diantara pelaku pasar pada tanggal pengukuran di pasar utama atau, jika tidak terdapat pasar utama, di pasar yang paling menguntungkan di mana Bank memiliki akses pada tanggal tersebut. Nilai wajar liabilitas mencerminkan risiko wanprestasinya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

6. Offsetting (continued)

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.

7. Amortised cost measurement

The amortised cost of a financial asset or liability is the amount at which the financial asset or liability is measured at initial recognition minus principal repayments, plus or minus the cumulative amortisation using the effective interest method of any difference between the initial amount and the maturity amount, and for financial assets, adjusted for any allowance for impairment losses.

8. Fair value measurement

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at 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.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

8. Pengukuran nilai wajar (lanjutan)

Jika tersedia, Bank mengukur nilai wajar dari suatu instrumen dengan menggunakan harga kuotasi di pasar aktif untuk instrumen terkait. Suatu pasar dianggap aktif bila harga yang dikuotasikan tersedia sewaktu-waktu dari bursa, pedagang efek (*dealer*), perantara efek (*broker*), kelompok industri, badan pengawas (*pricing service or regulatory agency*), dan merupakan transaksi pasar aktual dan teratur terjadi yang dilakukan secara wajar.

Jika pasar untuk instrumen keuangan tidak aktif, Bank menetapkan nilai wajar dengan menggunakan teknik penilaian.

Teknik penilaian mencakup penggunaan transaksi pasar terkini yang dilakukan secara wajar oleh pihak-pihak yang memahami, berkeinginan, dan jika tersedia, referensi atas nilai wajar terkini dari instrumen lain yang secara substansial sama, penggunaan analisa arus kas yang didiskonto, dan penggunaan model penetapan harga opsi (*option pricing model).* Teknik penilaian yang dipilih memaksimalkan penggunaan input yang dapat diobservasi yang relevan dan meminimalkan penggunaan input yang tidak dapat diobservasi, memasukkan semua faktor yang akan dipertimbangkan oleh para pelaku pasar dalam menetapkan suatu harga dan konsisten dengan metodologi ekonomi yang diterima dalam penetapan harga instrumen keuangan.

Input yang digunakan dalam teknik penilaian secara memadai mencerminkan ekspektasi pasar dan ukuran atas faktor risiko dan pengembalian (*risk-return*) yang melekat pada instrumen keuangan. Bank mengkalibrasi teknik penilaian dan menguji validitasnya dengan menggunakan harga-harga dari transaksi pasar terkini yang dapat diobservasi untuk instrumen yang sama atau atas dasar data pasar lainnya yang tersedia yang dapat diobservasi.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

8. Fair value measurement (continued)

When available, the Bank measures the fair value of an instrument using quoted prices in an active market for that instrument. A market is regarded as active if quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service or regulatory agency and those prices represent actual and regularly occurring market transactions on an arm's length basis.

If a market for a financial instrument is not active, the Bank establishes fair value using a valuation technique.

Valuation techniques include using recent arm's length transactions between knowledgeable, willing parties and if available, reference to the current fair value of other instruments that are substantially the same, discounted cash flows analysis, and option pricing models. The chosen valuation technique maximizes the use of relevant observable inputs and minimizes the use of unobservable inputs, incorporates all factors that market participants would consider in setting a price, and is consistent with accepted economic methodologies for pricing financial instruments.

Inputs to valuation techniques reasonably represent market expectations and measures of the risk-return factors inherent in the financial instrument. The Bank calibrates valuation techniques and tests them for validity using prices from observable current market transactions in the same instrument or based on other available observable market data.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

8. Pengukuran nilai wajar (lanjutan)

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 identik 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 diakui dalam laba rugi berdasarkan umur dari instrumen tersebut namun tidak lebih lambat dari saat penilaian tersebut didukung sepenuhnya oleh data pasar yang dapat diobservasi atau saat transaksi ditutup.

Jika aset atau liabilitas yang diukur pada nilai wajar memiliki harga penawaran dan harga permintaan, maka Bank mengukur aset dan posisi *long* berdasarkan harga penawaran dan mengukur liabilitas dan posisi *short* berdasarkan harga permintaan.

Nilai wajar mencerminkan risiko kredit atas instrumen keuangan dan termasuk penyesuaian yang dilakukan untuk memasukkan risiko kredit Bank dan pihak lawan, mana yang lebih sesuai.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

8. Fair value measurement (continued)

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 recognised in profit or loss on an appropriate basis over the life of the instrument but no later than when the valuation is wholly supported by observable market data or the transaction is closed out.

If an asset or a liability measured at fair value has a bid price and an ask price, then the Bank measures assets and long positions at a bid price and liabilities and short positions at an ask price.

Fair values reflect the credit risk of the instrument and include adjustments to take into account the credit risk of the Bank and counterparty where appropriate.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

8. Pengukuran nilai wajar (lanjutan)

Bank mengklasifikasikan pengukuran nilai wajar dengan menggunakan hirarki nilai wajar yang mencerminkan signifikansi input yang digunakan dalam melakukan pengukuran. Hirarki nilai wajar memiliki tingkat sebagai berikut:

a. Tingkat 1: Harga kuotasian (tanpa penyesuaian) di pasar aktif untuk aset atau liabilitas yang identik;

b. Tingkat 2: Input selain harga kuotasian yang termasuk dalam level 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung (misalnya harga) maupun tidak langsung (misalnya derivasi harga); dan

c. Tingkat 3: Input untuk aset atau liabilitas yang bukan berdasarkan data pasar yang dapat diobservasi (input yang tidak dapat diobservasi).

9. Cadangan kerugian penurunan nilai 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*.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

8. Fair value measurement (continued)

The Bank classifies fair value measurements using a fair value hierarchy that reflects the significance of the inputs used in making the measurements. The fair value hierarchy shall have the following levels:

a. Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities;

b. Level 2: Inputs other than quoted prices included within Level 1 that are observable for the assets or liabilities, either directly (that is, as prices) or indirectly (that is, derived from prices); and

c. Level 3: Inputs for the assets or liabilities that are not based on observable market data (unobservable inputs).

9. Allowance for impairment losses on financial assets

The Bank assesses on a forward-looking basis the expected credit loss ("ECL") associated with its financial asset instruments carried at amortised cost and fair value through other comprehensive income. The impairment methodology applied depends on whether there has been a significant increase in credit risk to financial assets 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.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Kriteria yang digunakan oleh Bank untuk menentukan dari penurunan nilai adalah sebagai berikut:

a. Kesulitan keuangan signifikan yang dialami penerbit atau pihak peminjam;
b. Pelanggaran kontrak, seperti terjadinya wanprestasi atau tunggakan pembayaran pokok atau bunga;
c. Pihak pemberi kredit, dengan alasan ekonomi atau hukum sehubungan dengan kesulitan keuangan yang dialami pihak peminjam, memberikan keringanan (konsesi) pada pihak peminjam yang tidak mungkin diberikan jika pihak peminjam tidak mengalami kesulitan tersebut;
d. Terdapat kemungkinan bahwa pihak peminjam akan dinyatakan pailit atau melakukan reorganisasi keuangan lainnya;
e. Hilangnya pasar aktif dari aset keuangan akibat kesulitan keuangan; atau
f. Data yang dapat diobservasi mengindikasikan adanya penurunan yang dapat diukur atas estimasi arus kas masa datang dari kelompok aset keuangan sejak pengakuan awal aset dimaksud, meskipun penurunannya belum dapat diidentifikasi terhadap aset keuangan secara individual dalam kelompok aset tersebut, termasuk:
   (a) Memburuknya status pembayaran pihak peminjam dalam kelompok tersebut; dan
   (b) Kondisi ekonomi nasional atau lokal yang berkorelasi dengan wanprestasi atas aset dalam kelompok tersebut.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

The criteria used by the Bank to determine the impairment are as follows:

a. Significant financial difficulty of the issuer or obligor;
b. A breach of contract, such as a default or delinquency in interest or principal payments;
c. The lender, for economic or legal reasons relating to the borrower's financial difficulty, grants the borrower a concession that the lender would not otherwise consider;
d. It becomes probable that the borrower will enter into bankruptcy or other financial reorganization;
e. The disappearance of an active market for that financial asset because of financial difficulties; or
f. Observable data indicating that there is a measurable decrease in the estimated future cash flows from a portfolio of financial assets since the initial recognition of those assets, although the decrease has not yet been identified individually in the portfolio, including:
   (a) Adverse changes in the payment status of borrowers in the portfolio; and
   (b) National or local economic conditions that correlate with defaults on the assets in the portfolio.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi

Bank telah mencatat cadangan untuk kerugian kredit ekspektasian yang ditaksir atas seluruh pinjaman yang diberikan dan aset keuangan yang tidak dimiliki pada nilai wajar melalui laba rugi, bersama dengan komitmen atas pinjaman yang diberikan dan kontrak garansi keuangan, dalam hal ini dirujuk sebagai instrumen keuangan.

Cadangan atas kerugian kredit ekspektasian adalah berdasarkan atas kerugian ekspektasian sepanjang umur aset (*the lifetime expected credit loss*), kecuali tidak terdapat kenaikan yang signifikan dalam risiko kredit sejak awal, di mana dalam hal ini, cadangan adalah berdasarkan kerugian kredit ekspektasian dalam jangka waktu 12 bulan.

Kerugian yang diharapkan sepanjang umur aset dan kerugian kredit ekspektasian dalam jangka waktu 12 bulan dihitung baik secara individual maupun kolektif, tergantung kepada sifat portofolio instrumen keuangan yang mendasarinya.

Bank menghitung kerugian kredit ekspektasian berdasarkan dua skenario yang tertimbang menurut kemungkinan terjadinya untuk mengukur kekurangan kas yang diharapkan, didiskontokan pada suatu estimasi terhadap suku bunga efektif. Kekurangan kas adalah selisih antara arus kas yang harus dibayar kepada suatu entitas berdasarkan kontrak dan arus kas dari entitas bersangkutan yang diharapkan untuk diperoleh.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost

The Bank has been recording the allowance for expected credit losses for all loans and other debt financial assets not held at fair value of profit or loss, together with loan commitments and financial guarantee contracts, in this section are all referred to as financial instruments.

The expected credit loss allowance is based on the credit losses expected to arise over the life of the asset (the lifetime expected credit loss), unless there has been no significant increase in credit risk since origination, in which case, the allowance is based on the 12-month expected credit loss.

Both the lifetime expected credit loss and 12-month expected credit loss are calculated on either an individual basis or a collective basis, depending on the nature of the underlying portfolio of financial instruments.

The Bank calculates expected credit loss based on two probability-weighted scenarios to measure the expected cash shortfalls, discounted at an approximation to the effective interest rate. A cash shortfall is the difference between the cash flows that are due to an entity in accordance with the contract and the cash flows that the entity expects to receive.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Bank telah menyusun suatu kebijakan untuk melakukan suatu penilaian, pada akhir setiap periode pelaporan, mengenai apakah risiko kredit suatu aset keuangan telah meningkat secara signifikan sejak pengakuan, dengan mempertimbangkan perubahan risiko kegagalan yang muncul pada sisa umur instrumen keuangan tersebut.

Bank mengakui cadangan kerugian untuk ECL pada instrumen keuangan yang tidak diukur pada FVTPL. Untuk perhitungan penurunan nilai secara kolektif, Bank menggunakan model yang kompleks yang menggunakan matriks *probability of default* ("PD"), *loss given default* ("LGD") dan *exposure at default* ("EAD"), yang didiskontokan menggunakan suku bunga efektif.

- ***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 dengan dampak asumsi ekonomi masa depan yang memiliki pengaruh terhadap risiko kredit. PD diestimasikan pada *point in time* yang artinya PD akan berfluktuasi sejalan dengan siklus ekonomi.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

The Bank has established a policy to perform an assessment, at the end of each reporting period, whether a financial instrument's credit risk has increased significantly since initial recognition, by considering the change in the risk of default occurring over the remaining life of the financial instrument.

The Bank recognises loss allowances for ECL on the financial instruments that are not measured at FVTPL. For the collective impairment calculation, the Bank primarily uses sophisticated models that utilise the probability of default ("PD"), loss given default ("LGD") and exposure at default ("EAD") metrics, discounted using the effective interest rate.

- ***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.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

- ***Loss Given Default ("LGD")***

Kerugian yang diperkirakan akan timbul dari debitur yang mengalami gagal bayar dengan memperhitungkan dampak dari asumsi ekonomi masa depan yang relevan (jika ada) yaitu 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 yang merupakan bagian integral dari aset keuangan dengan mempertimbangkan asumsi ekonomi di masa depan jika relevan.

- ***Exposure at Default ("EAD")***

Perkiraan nilai eksposur 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.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

- ***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.

- ***Exposure at Default ("EAD")***

The expected exposure at the time of default, takes 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.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Kerugian kredit ekspektasian 12 bulan (*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 12 (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 12 (dua belas) bulan.

Peningkatan risiko kredit yang signifikan (*Stage 2*)

Jika aset keuangan mengalami peningkatan risiko kredit yang signifikan ("SICR") sejak pengakuan awal, kerugian kredit ekspektasian diakui atas kejadian gagal bayar yang mungkin terjadi sepanjang umur aset.

Peningkatan signifikan dalam risiko kredit dinilai dengan membandingkan risiko gagal bayar atas eksposur pada tanggal pelaporan dengan risiko gagal bayar saat pengakuan awal (setelah memperhitungkan perjalanan waktu dari akun tersebut).

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

12-month expected credit losses (Stage 1)

ECL's 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 12 (twelve) months into the future from the reporting date. ECL's 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's will revert to being determined on a 12 (twelve)-month basis.

Significant increase in credit risk (Stage 2)

If a financial asset experiences a significant increase in credit risk ("SICR") since initial recognition, an expected credit loss provision is recognised for default events that may occur over the lifetime of the asset.

Significant increase in credit risk is assessed by comparing the risk of default of an exposure at the reporting date to the risk of default at origination (after taking into account the passage of time).

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Peningkatan risiko kredit yang signifikan (*Stage 2*) (lanjutan)

Signifikan tidak berarti signifikan secara statistik, juga tidak dinilai dalam konteks perubahan dalam ECL. Perubahan atas risiko gagal bayar dinilai signifikan atau tidak, menggunakan sejumlah faktor kuantitatif dan kualitatif, yang bobotnya bergantung pada tipe produk dan pihak lawan. Aset keuangan dengan tunggakan 30 hari atau lebih dan tidak mengalami penurunan nilai akan selalu dianggap telah mengalami peningkatan risiko kredit yang signifikan.

Eksposur yang mengalami penurunan nilai kredit atau gagal bayar (*Stage 3*)

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. 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.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

Significant increase in credit risk (Stage 2) (continued)

Significant does not mean statistically significant nor is it assessed in the context of changes in ECL. Whether a change in the risk of default is significant or not is assessed using a number of quantitative and qualitative factors, the weight of which depends on the type of product and counterparty. Financial assets that are 30 or more days past due and not credit-impaired will always be considered to have experienced a significant increase in credit risk.

Credit impaired or defaulted exposures (Stage 3)

Financial assets that are credit impaired (or in default) represent those that are at least 90 days past due in respect of principal and/or interest. 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.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Eksposur yang mengalami penurunan nilai kredit atau gagal bayar (*Stage* 3) (lanjutan)

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 yang lebih pendek antara umur ekspektasian dan 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), bukan sepanjang periode kontrak.

Untuk aset keuangan yang bisnis modelnya merupakan untuk mendapatkan arus kas kontraktual, seperti kredit yang diberikan, aset keuangan tersebut dicatat pada biaya perolehan diamortisasi. Bank pertama kali menentukan apakah terdapat bukti objektif penurunan nilai secara individual atas aset keuangan yang signifikan secara individual atau secara kolektif untuk aset keuangan yang tidak signifikan secara individual.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

Credit impaired or defaulted exposures (Stage 3) (continued)

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 shorter of the expected life and 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) rather than the contractual term.

For financial assets under business model Hold to Collect, such as loans, carried at amortised cost, the Bank first determines whether there is objective evidence of impairment individually on financial assets that are individually significant or collectively, for non-individually significant financial assets.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Eksposur yang mengalami penurunan nilai kredit atau gagal bayar (*Stage* 3) (lanjutan)

Penilaian secara individual dilakukan atas aset keuangan yang signifikan yang memiliki bukti objektif penurunan nilai. Aset keuangan yang tidak signifikan dimasukkan dalam kelompok aset keuangan yang memiliki karakteristik risiko kredit yang sejenis dan dilakukan penilaian secara kolektif.

Bank menganggap sekuritas investasi pemerintah dalam mata uang Rupiah dan dana yang ditempatkan pada Bank Indonesia memiliki risiko kredit yang rendah, karena pokok dan bunga investasi pemerintah tersebut dijamin oleh pemerintah dan tidak ada pengalaman kerugian yang pernah terjadi. Bank tidak menerapkan pengecualian risiko kredit yang rendah untuk instrumen keuangan lainnya.

Cadangan kerugian untuk ECL disajikan dalam laporan posisi keuangan sebagai berikut ini:
- Aset keuangan diukur pada biaya perolehan diamortisasi: sebagai pengurang dari nilai tercatat bruto aset;
- Komitmen pinjaman dan kontrak jaminan keuangan: umumnya, sebagai provisi yang dicatat pada liabilitas lainnya.

Bank pertama kali menentukan apakah terdapat bukti objektif penurunan nilai secara individual atas aset keuangan yang signifikan secara individual atau kolektif untuk aset keuangan yang tidak signifikan secara individual.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

Credit impaired or defaulted exposures (Stage 3) (continued)

Individual valuations are made on significant financial assets that have objective evidence of impairment. Insignificant financial assets are included in a group of financial assets that have similar credit risk characteristics and are assessed collectively.

The Bank considers a Rupiah denominated government investment securities and funds placed with Bank Indonesia as having low credit risk, since the principal and interest of government bond are guaranteed by the government and there is no historical loss experience. The Bank does not apply the low credit risk exemption to any other financial instruments.

Loss allowances for ECL are presented in the statement of financial position as follows:
- *Financial assets measured at amortised cost: as a deduction from the gross carrying amount of the assets;*
- *Loan commitments and financial guarantee contracts: generally, as a provision which is presented in other liabilities.*

The Bank first assesses whether objective evidence of impairment exists individually for financial assets that are individually significant, or collectively for financial assets that are not individually significant.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Eksposur yang mengalami penurunan nilai kredit atau gagal bayar (*Stage* 3) (lanjutan)

Jika Bank menentukan tidak terdapat bukti objektif mengenai penurunan nilai atas aset keuangan yang dinilai secara individual, terlepas aset keuangan tersebut signifikan atau tidak, maka Bank memasukkan aset tersebut ke dalam kelompok aset keuangan yang memiliki karakteristik risiko kredit yang serupa dan menilai penurunan nilai kelompok tersebut secara kolektif.

Aset keuangan yang penurunan nilainya dilakukan secara individual dan untuk itu kerugian penurunan nilai telah diakui atau tetap diakui, tidak termasuk dalam penilaian penurunan nilai secara kolektif.

Bank menetapkan kredit yang harus dievaluasi penurunan nilainya secara individual, jika memenuhi salah satu kriteria di bawah ini:

1. Kredit yang secara individual memiliki nilai signifikan dan memiliki bukti objektif penurunan nilai;
2. Kredit yang direstrukturisasi yang secara individual memiliki nilai signifikan.

Berdasarkan kriteria di atas, Bank melakukan penilaian secara individual untuk: (a) Kredit dengan kolektibilitas kurang lancar, diragukan dan macet dengan plafond di atas Rp10.000.000.000 (nilai penuh); atau (b) Kredit yang direstrukturisasi.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

Credit impaired or defaulted exposures (Stage 3) (continued)

If the Bank determines that no objective evidence of impairment exists for an individually assessed financial asset, whether the financial assets is significant or not, they include the asset in a group of financial assets with similar credit risk characteristics and collectively assesses them for impairment.

Financial assets on which impairment is assessed individually and therefore the impairment is recognized or still recognized, is not included in the collective impairment.

The Bank determines that loans should be evaluated for impairment individually if one of the following criteria is met:

1. Loans which individually have significant value and objective evidence of impairment;

2. Restructured loans which individually have significant value.

Based on the above criteria, the Bank performs individual assessment for: (a) Loans with collectibility classification as substandard, doubtful, and loss with plafond above Rp10,000,000,000 (full amount); or (b) Restructured loans.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Eksposur yang mengalami penurunan nilai kredit atau gagal bayar (*Stage* 3) (lanjutan)

Bank menetapkan kredit yang harus dievaluasi penurunan nilainya secara kolektif, jika memenuhi salah satu kriteria di bawah ini:

1. Kredit yang secara individual memiliki nilai signifikan namun tidak memiliki bukti objektif penurunan nilai;
2. Kredit yang secara individual memiliki nilai tidak signifikan;
3. Kredit yang direstrukturisasi yang secara individual memiliki nilai tidak signifikan.

Berdasarkan kriteria di atas, penilaian secara kolektif dilakukan untuk: (a) Kredit dalam segmen pasar korporasi dan usaha menengah dengan kolektibilitas lancar dan dalam perhatian khusus serta tidak pernah direstrukturisasi; atau (b) Kredit dengan segmen pasar usaha kecil dan konsumen.

Perhitungan cadangan kerugian penurunan nilai atas aset keuangan yang dinilai secara kolektif dikelompokkan berdasarkan karakteristik risiko kredit yang sama dengan mempertimbangkan segmentasi kredit berdasarkan pengalaman kerugian masa lalu dan kemungkinan terjadinya kegagalan (*probability of default*).

Bank menggunakan data historis 5 (lima) tahun dalam menghitung *Probability of Default* (PD) dan *Loss Given Default* (LGD).

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

Credit impaired or defaulted exposures (Stage 3) (continued)

The Bank determines loans to be evaluated for impairment through collective evaluation if one of the following criteria is met:

1. *Loans which individually have significant value but there is no objective evidence of impairment;*
2. *Loans which individually have insignificant value;*
3. *Restructured loans which individually have insignificant value.*

Based on the above criteria, collective assessment is performed for: (a) Corporate and middle loans with collectibility classification as current and special mention, and have never been restructured; or (b) Retail and consumer loans.

Calculation of allowance for impairment losses on financial assets assessed collectively and grouped based on similar credit risk characteristics and taking into account the loan segmentation based on historical loss experience and the probability of default.

The Bank uses 5 (five) years of historical data to compute for the Probability of Default (PD) and Loss Given Default (LGD).

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Bank menggunakan nilai wajar agunan sebagai dasar arus kas masa datang apabila memenuhi salah satu kondisi berikut:

1. Kredit bersifat *collateral dependent,* yaitu jika pelunasan kredit hanya bersumber dari agunan;
2. Pengambilalihan agunan kemungkinan besar terjadi dan didukung dengan perjanjian legal pengikatan agunan.

Kerugian penurunan nilai atas aset keuangan yang dicatat pada biaya perolehan diamortisasi diukur sebesar selisih antara nilai tercatat aset keuangan dengan nilai kini estimasi arus kas masa datang yang didiskonto menggunakan suku bunga efektif awal dari aset keuangan tersebut. Jika kredit yang diberikan atau surat-surat berharga diukur pada biaya perolehan diamortisasi memiliki suku bunga variabel, maka tingkat diskonto yang digunakan untuk mengukur setiap kerugian penurunan nilai adalah suku bunga efektif terkini.

Sebagai panduan praktis, Bank dapat mengukur penurunan nilai berdasarkan nilai wajar instrumen dengan menggunakan harga pasar yang dapat diobservasi, di mana perhitungan nilai kini dari estimasi arus kas masa datang atas aset keuangan dengan agunan (*collateralized financial asset*) mencerminkan arus kas yang dapat dihasilkan dari pengambilalihan agunan dikurangi biaya-biaya untuk memperoleh dan menjual agunan, terlepas apakah pengambilalihan tersebut berpeluang terjadi atau tidak.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

The Bank uses the fair value of collateral as the basis for the future cash flows if one of the following conditions is met:

1. Loans are collateral dependent, i.e., if the source of loan repayment is only from collateral;

2. Foreclosure of collateral is most likely to occur and supported by legally binding collateral agreement.

Impairment losses on financial assets carried at amortised cost are measured as the difference between the carrying amount of the financial assets and present value of estimated future cash flows discounted at the financial assets' original effective interest rate. If loans or marketable securities measured at amortised cost have variable interest rate, the discount rate used to measure loss on impairment is the current effective interest rate.

As a practical guidance, the Bank can measure the impairment based on the instruments fair value by using observable market price, where the calculation of present value of estimated future cash flows on collateralized financial assets reflects the generated cash flow from the foreclosure of collateral net of costs to acquire and sell the collateral, regardless whether such acquisition occurs or not.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

a. Aset keuangan yang dicatat berdasarkan biaya perolehan diamortisasi (lanjutan)

Kerugian penurunan nilai yang terjadi diakui pada laporan laba rugi dan penghasilan komprehensif lain dan dicatat pada akun "Cadangan kerugian penurunan nilai" sebagai pengurang terhadap aset keuangan yang dicatat pada biaya perolehan diamortisasi.

Pendapatan bunga atas aset keuangan yang mengalami penurunan nilai tetap diakui atas dasar suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam pengukuran kerugian penurunan nilai.

Ketika peristiwa yang terjadi setelah tanggal laporan posisi keuangan menyebabkan jumlah kerugian penurunan nilai berkurang, kerugian penurunan nilai yang sebelumnya diakui harus dipulihkan dan pemulihan tersebut diakui dalam laba rugi pada laporan laba rugi dan penghasilan komprehensif lain.

b. Aset keuangan yang diukur pada pendapatan komprehensif lain

Untuk aset keuangan dengan nilai wajar yang diukur pada penghasilan komprehensif lainnya, saldo di neraca mencerminkan nilai wajar dari instrumen. Cadangan kerugian kredit ekspektasian diakui sebagai bagian dari pendapatan komprehensif lainnya di laporan posisi keuangan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

a. Financial assets carried at amortised cost (continued)

Impairment losses are recognized in the statement of profit and loss and other comprehensive income and reflected in an "Allowance for impairment losses" account as a deduction from financial assets carried at amortised cost.

Interest income on the impaired financial assets continues to be recognized using the rate of interest used to discount the future cash flows for the purpose of measuring the impairment loss.

When subsequent event causes the amount of impairment loss to decrease, the impairment loss is reversed through profit or loss in the statements of profit and loss and other comprehensive income.

b. Financial assets classified as fair value through other comprehensive income

For financial assets classified as fair value through other comprehensive income, the balance sheet amount reflects the fair value of the asset. Expected credit losses are recognised as an addition of other comprehensive income in the statement of financial position.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

b. Aset keuangan yang diukur pada pendapatan komprehensif lain (lanjutan)

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).

Jika pada periode berikutnya, nilai wajar instrumen utang yang diklasifikasikan dalam aset keuangan dengan nilai wajar yang diukur pada penghasilan komprehensif lainnya meningkat dan peningkatan tersebut dapat secara objektif dihubungkan dengan peristiwa yang terjadi setelah pengakuan kerugian nilai pada laporan laba rugi dan penghasilan komprehensif lain, maka kerugian penurunan nilai tersebut harus dipulihkan dan diakui pada periode terjadinya.

Tidak ada penyisihan kerugian kredit ekskpektasian pada investasi instrumen ekuitas.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

b. Financial assets classified as fair value through other comprehensive income (continued)

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).

If in a subsequent period, the fair value of debt instruments classified as fair value through other comprehensive income securities increases and the increase can be objectively related to an event occurring after the impairment loss was recognized in profit or loss and other comprehensive income, the impairment loss is reversed and recognized in the period it occurred.

There is no allowance for expected credit losses on investment in equity instruments.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

c. Pemulihan aset keuangan yang dihapuskan

Ketika kredit yang diberikan tidak tertagih, kredit yang diberikan tersebut dihapusbuku dengan menjurnal balik cadangan kerugian penurunan nilai. Kredit yang diberikan tersebut dapat dihapusbukukan setelah semua prosedur yang diperlukan telah dilakukan dan jumlah kerugian telah ditentukan serta tidak memiliki prospek usaha.

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan pada tahun berjalan dikreditkan dengan menyesuaikan akun cadangan kerugian penurunan nilai. Penerimaan kembali atas aset keuangan yang telah dihapusbukukan pada tahun sebelumnya dicatat sebagai pendapatan operasional selain pendapatan bunga.

Jika persyaratan kredit yang diberikan, piutang atau surat-surat berharga yang dimiliki hingga jatuh tempo dinegosiasi ulang atau dimodifikasi karena debitur atau penerbit mengalami kesulitan keuangan, maka penurunan nilai diukur dengan suku bunga efektif awal yang digunakan sebelum persyaratan diubah.

Jika pada suatu periode berikutnya, jumlah kerugian penurunan nilai berkurang dan pengurangan tersebut dapat dikaitkan secara objektif pada peristiwa yang terjadi setelah penurunan nilai diakui (seperti meningkatnya peringkat kredit debitur atau penerbit), maka kerugian penurunan nilai yang sebelumnya diakui harus dipulihkan, dengan menyesuaikan akun cadangan. Jumlah pemulihan aset keuangan diakui pada laporan laba rugi dan penghasilan komprehensif lain pada tahun berjalan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

c. Recoveries of written-off financial assets

When a loan is uncollectible, it is written off against the related allowance for impairment loss. Such loans are written off after all the necessary procedures have been completed and the amount of the loss has been determined and has no business prospects.

The recoveries of written-off financial assets in the current year are credited by adjusting the allowance for impairment losses accounts. Recoveries of written-off financial assets from previous years are recorded as operational income other than interest income.

If the term on loans receivable or amortised cost marketable securities are renegotiated or modified since the debtor or issuer has financial difficulties, the impairment is measured with the original effective interest rate used before the modification of terms.

If in the next period, the amount of allowance for impairment losses is decreased and the decrease can be objectively related to an event that occurred after the recognition of the impairment losses (i.e. upgrade of debtor's or issuer's collectibility credit rating), the impairment loss that was previously recognized has to be reversed, by adjusting the allowance account. The reversal amount of financial assets is recognized in the current year statement of profit and loss and other comprehensive income.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Penerimaan kembali atas aset keuangan yang telah dihapusbukukan dicatat sebagai pendapatan operasional lainnya.

Berdasarkan POJK No.40/POJK.03/2019 tentang Penilaian Kualitas Aset Bank Umum, Bank wajib membentuk cadangan kerugian penurunan nilai sesuai Standar Akuntansi Keuangan. Selain itu, Bank perlu menghitung Penyisihan Penilaian Kualitas Aset (PPKA) untuk perhitungan Kewajiban Penyediaan Modal Minimum (KPMM), sesuai dengan kriteria sebagai berikut:

a. 1% dari aktiva produktif yang digolongkan Lancar, di luar penempatan pada Bank Indonesia, Obligasi Pemerintah, instrumen hutang lain yang diterbitkan oleh Pemerintah Republik Indonesia dan aktiva produktif yang dijamin dengan agunan tunai dan tagihan kredit yang belum ditarik yang merupakan bagian dari transaksi rekening administrasi;
b. 5% dari aktiva produktif yang digolongkan Dalam Perhatian Khusus setelah dikurangi agunan;
c. 15% dari aktiva produktif yang digolongkan Kurang Lancar setelah dikurangi agunan;
d. 50% dari aktiva produktif yang digolongkan Diragukan setelah dikurangi agunan; dan
e. 100% dari aktiva produktif yang digolongkan Macet setelah dikurangi agunan.

Kriteria penilaian nilai agunan yang dapat dikurangkan dalam pembentukan cadangan kerugian penurunan nilai sesuai dengan POJK.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

The recoveries of written-off financial assets are recorded as other operating income.

Based on POJK No.40/POJK.03/2019 regarding the Assessment of Asset Quality for Conventional Banks, the Bank is required to establish the allowance for impairment losses in accordance with Financial Accounting Standard. In addition, the Bank is also required to calculate the allowance for assets based on certain percentage of the assets quality (PPKA) for the purpose of Capital Adequacy Ratio (CAR) calculation, with the following criteria:

a. 1% of earning assets classified as Current, excluding placements with Bank Indonesia, Government Bonds, other debt instruments issued by the Government of the Republic of Indonesia and earning assets secured by cash collateral and undisbursed credit claims that are part of administrative account transactions;
b. 5% of earning assets classified as Special Mention, net of deductible collateral;
c. 15% of earning assets classified as Sub-standard, net of deductible collateral;
d. 50% of earning assets classified as Doubtful, net of deductible collateral; and
e. 100% of earning assets classified as Loss, net of deductible collateral.

The criteria for assessment of the value of collateral that can be deducted in the calculation of allowance for impairment losses are based on POJK.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Modifikasi instrumen keuangan

Aset dan liabilitas keuangan modifikasian adalah instrumen dimana kontraktual awal telah mengalami perubahan. Modifikasi ini termasuk antara lain perubahan atas jangka waktu, arus kas dan atau tingkat bunga di antara faktor lainnya.

Saat aset keuangan telah dimodifikasi, ketentuan yang dimodifikasi dinilai atas basis kualitatif dan kuantitatif untuk menentukan apakah perubahan fundamental atas sifat dari instrumen telah terjadi, dan apakah penghentian pengakuan atas instrumen yang ada dan pengakuan instrumen baru tepat dilakukan.

Saat penghentian pengakuan aset keuangan tepat dilakukan, nilai sisa aset yang baru akan dinilai untuk menentukan apakah aset tersebut harus diklasifikasikan sebagai aset keuangan yang dibeli atau yang berasal dari aset keuangan memburuk atau *purchased or originated credit-impaired assets* (POCI). Jika penghentian pengakuan tidak tepat dilakukan, nilai bruto nilai tercatat instrumen yang terkait dihitung ulang sebagai nilai kini dari hasil renegosiasi atau modifikasi atas arus kas kontraktual yang didiskonto pada tingkat suku bunga efektif awal (atau tingkat suku bunga efektif yang disesuaikan untuk aset keuangan POCI).

Perbedaan antara hasil perhitungan ulang dan sebelum modifikasi atas nilai tercatat bruto dari instrumen dicatat sebagai keuntungan atau kerugian modifikasian pada laba rugi. Keuntungan dan kerugian dari modifikasian karena alasan kredit dicatat sebagai bagian dari kerugian penurunan nilai. Keuntungan dan kerugian dari modifikasian yang tidak karena alasan kredit diakui antara sebagai bagian dari kerugian penurunan nilai atau pendapatan bergantung pada apakah terdapat perubahan risiko kredit atas aset keuangan setelah modifikasian.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

Modification of financial instruments

Modified financial assets and financial liabilities are whose original contractual terms have been modified. Modifications may include changes to the tenor, cash flows and or interest rates among other factors.

Where financial assets have been modified, the modified terms are assessed on a qualitative and quantitative basis to determine whether a fundamental change in the nature of the instrument has occurred, such as whether the derecognition of the pre-existing instrument and the recognition of a new instrument is appropriate.

Where derecognition of financial assets is appropriate, the newly recognised residual assets are assessed to determine whether the assets should be classified as purchased or originated credit-impaired assets (POCI). Where derecognition is not appropriate, the gross carrying amount of the applicable instruments is recalculated as the present value of the renegotiated or modified contractual cash flows discounted at the original effective interest rate (or credit adjusted effective interest rate for POCI financial assets).

The difference between the recalculated values and the pre-modified gross carrying values of the instruments are recorded as a modification gain or loss in the profit or loss. Gains and losses arising from modifications for credit reasons are recorded as part of 'credit impairment'. Modification gains and losses arising for non-credit reasons are recognised either as part of "credit impairment" or within income depending on whether there has been a change in the credit risk on the financial asset subsequent to the modification.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Modifikasi instrumen keuangan (lanjutan)

Keuntungan dan kerugian dari modifikasian liabilitas keuangan dicatat dalam laporan laba rugi dan penghasilan komprehensif lain.

Ketika modifikasi jangka waktu atas suatu liabilitas keuangan yang ada tidak dianggap substansial tidak mengakibatkan penghentian pengakuan, biaya perolehan diamortisasi liabilitas keuangan dihitung ulang menggunakan nilai kini estimasi arus kas kontraktual masa depan yang didiskontokan dengan suku bunga efektif awal. Selisih yang dihasilkan diakui dalam laba rugi.

Cadangan kerugian penurunan nilai aset keuangan atas komitmen kredit yang diberikan dan kontrak jaminan keuangan

Kerugian kredit ekspektasian atas komitmen kredit yang diberikan dan jaminan keuangan diakui pada liabilitas lain-lain. Jika instrumen keuangan mencakup komponen aset keuangan dan komitmen yang belum ditarik dan tidak dapat dipisahkan atas kerugian kredit ekspektasian pada komponen ini, jumlah kerugian kredit atas komitmen tersebut diakui bersamaan dengan kerugian kredit atas aset keuangan.

Dalam kondisi jumlah kerugian kredit ekspektasian gabungan melebihi jumlah tercatat bruto dari aset keuangan, maka kerugian kredit ekspektasian diakui sebagai liabilitas lain-lain.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

Modification of financial instruments (continued)

Modification gains and losses arising on financial liabilities are recognised in statements of profit or loss and other comprehensive income.

When the modification of the terms of an existing financial liability is not judged to be substantial and, consequently, does not result in derecognition, the amortized cost of the financial liability is recalculated by computing the present value of estimated future contractual cash flows that are discounted at the financial liability's original effective interest rate. Any resulting difference is recognized immediately in profit or loss.

Allowance for possible losses on loan commitments and guarantee contracts

Expected credit loss on loan commitments and financial guarantees is recognised as other liabilities. Where a financial instrument includes both financial asset and an undrawn commitment and it is not possible to separately identify the expected credit loss on these components, expected credit loss amounts on the loan commitment are recognised together with expected credit loss amounts on the financial asset.

To the extent the combined expected credit loss exceeds the gross carrying amount of the financial asset, the expected credit loss is recognised as other liabilities.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Cadangan kerugian penurunan nilai aset keuangan atas komitmen kredit yang diberikan dan kontrak jaminan keuangan (lanjutan)

Lifetime

Kerugian kredit ekspektasian diestimasikan berdasarkan periode dimana Bank terpapar pada risiko kredit. Bank memiliki proses review dari setiap model bisnis/produknya. Baik kredit *revolving* maupun *non-revolving*, untuk menghitung kerugian kredit ekspektasian menggunakan jangka waktu kontraktual sesuai dengan jangka waktu kontraknya. Penetapan periode tersebut khususnya untuk kredit *revolving* dilakukan dengan mempertimbangkan kondisi dimana proses perpanjangan kredit *revolving* yang diberikan oleh Bank dilakukan melalui kajian yang *robust* yaitu melalui evaluasi yang substantif dibandingkan administratif.

Variabel Makro Ekonomi ("MEV")

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.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

Allowance for possible losses on loan commitments and guarantee contracts (continued)

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. For both revolving and non-revolving loans, the Bank is using the contractual term in accordance with the contract period to calculate expected credit losses. 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.

Macro Economic Variable ("MEV")

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, the Bank should make more provisions today to absorb the credit losses likely to occur in the near future.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

e. Aset dan liabilitas keuangan (lanjutan)

9. Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

Cadangan kerugian penurunan nilai aset keuangan atas komitmen kredit yang diberikan dan kontrak jaminan keuangan (lanjutan)

Variabel Makro Ekonomi ("MEV") (lanjutan)

Untuk menangkap efek perubahan pada lingkungan ekonomi, model PD digunakan untuk menghitung kerugian kredit ekspektasian, dengan memasukkan informasi *forward looking* dalam bentuk perkiraan nilai-nilai variabel ekonomi yang kemungkinan akan berdampak pada kemampuan pembayaran kembali nasabah Bank.

Berbagai MEV digunakan untuk setiap model PD, tergantung pada hasil analisis statistik kesesuaian MEV dengan PD serta konsensus dari pakar kredit. Diantaranya adalah Indeks barang konsumtif, Inflasi, dan GDP Nasional.

f. Giro pada Bank Indonesia dan bank lain

Giro pada Bank Indonesia dan bank lain dinyatakan sebesar biaya perolehan diamortisasi menggunakan metode suku bunga efektif dikurangi penyisihan kerugian penurunan nilai. Giro pada Bank Indonesia dan bank lain diklasifikasikan sebagai biaya perolehan yang diamortisasi.

Lihat Catatan 3e untuk kebijakan akuntansi atas aset keuangan.

Giro Wajib Minimum

Sesuai dengan peraturan Bank Indonesia mengenai Giro Wajib Minimum Bank Umum pada Bank Indonesia dalam Rupiah dan Valuta Asing, Bank diwajibkan untuk menempatkan sejumlah persentase tertentu atas simpanan nasabah pada Bank Indonesia.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

e. Financial assets and liabilities (continued)

9. Allowance for impairment losses on financial assets (continued)

Allowance for possible losses on loan commitments and guarantee contracts (continued)

Macro Economic Variable ("MEV") (continued)

To capture the effect of changes to the economic environment, PD model is used to calculate expected credit loss, by incorporating forward-looking information in the form of forecasts of the values of economic variables that are likely to have an effect on the repayment ability of the Bank's customer.

Various types of MEVs are used for each PD model, depending on the statistical analysis result of appropriateness of the MEV with PD as well as consensus from credit expert. Amongst others are Consumer Goods Index, Inflation and National GDP.

f. Current accounts with Bank Indonesia and other banks

Current accounts with Bank Indonesia and other banks are stated at amortised cost using the effective interest rate method less allowance for impairment losses. The current accounts with Bank Indonesia and other banks are classified as amortised cost.

Refer to Note 3e for the accounting policies of financial assets.

Statutory Reserve Requirement

In accordance with prevailing Bank Indonesia regulation concerning Statutory Reserve in Rupiah and Foreign Currency for Commercial Banks, the Bank is required to place certain percentage of deposits from customers with Bank Indonesia.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

f. Giro pada Bank Indonesia dan bank lain (lanjutan)

Giro Wajib Minimum (lanjutan)

Lihat Catatan 44 untuk pemenuhan Giro Wajib Minimum Bank.

g. Penempatan pada Bank Indonesia dan bank lain

Penempatan pada Bank Indonesia dan bank lain merupakan penempatan dalam bentuk fasilitas simpanan Bank Indonesia dan deposito berjangka.

Penempatan pada Bank Indonesia dan bank lain diklasifikasikan sebagai aset keuangan dalam kategori biaya perolehan diamortisasi dan disajikan sebesar biaya perolehan diamortisasi dengan menggunakan metode suku bunga efektif dikurangi penyisihan kerugian penurunan nilai.

Lihat Catatan 3e untuk kebijakan akuntansi atas aset keuangan.

h. Efek-efek

Efek-efek yang dimiliki oleh Bank berupa Sekuritas Rupiah Bank Indonesia (SRBI), Surat Utang Negara (SUN) dan Obligasi Korporasi, diklasifikasikan sebagai aset keuangan yang diukur dengan nilai wajar melalui pendapatan komprehensif lainnya dan biaya perolehan diamortisasi.

Efek-efek yang diklasifikasikan ke dalam kelompok *held to collect and sell* disajikan sebesar nilai wajarnya. Keuntungan atau kerugian yang belum direalisasi dari efek-efek tersebut setelah dikurangi pajak yang tercatat dalam ekuitas diakui sebagai penghasilan atau beban pada periode dimana surat berharga tersebut dijual.

Efek-efek yang diklasifikasikan ke dalam kelompok *held to collect*, disajikan sebesar biaya perolehan yang disesuaikan dengan premi dan/atau diskonto yang belum diamortisasi. Premi atau diskonto diamortisasi dengan menggunakan metode suku bunga efektif.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

f. Current accounts with Bank Indonesia and other banks (continued)

Statutory Reserve Requirement (continued)

Refer to Note 44 for the Bank's fulfilment in the Statutory Reserve Requirement.

g. Placements with Bank Indonesia and other banks

Placements with Bank Indonesia and other banks represent placements in Bank Indonesia deposit facility and time deposit.

Placements with Bank Indonesia and other banks are measured at amortised cost and are stated at amortised cost using the effective interest rate method less allowance for impairment losses.

Refer to Note 3e for the accounting policies of financial assets.

h. Marketable securities

Securities held by the Bank in the form of Bank Indonesia Rupiah Securities (SRBI), Government Bond (SUN) and Corporate Bonds, were classified as financial assets measured at fair value through other comprehensive income and at amortised cost.

Marketable securities classified as held to collect and sell are presented at fair value. The unrealised gains or losses, net of tax, on the marketable securities recorded in equity are recognised as income or expense of the period when realised.

Marketable securities classified as held to collect are presented at cost adjusted for unamortised premium and/or discount. Premium or discount is amortised using effective interest method.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

h. Efek-efek (lanjutan)

Bila terjadi penurunan nilai wajar dibawah biaya perolehan (termasuk amortisasi premi dan/atau diskonto) yang bersifat permanen, maka biaya perolehan efek-efek yang bersangkutan diturunkan sebesar nilai wajarnya. Jumlah penurunan nilai tersebut diakui pada laporan laba rugi tahun berjalan dan penghasilan komprehensif lain.

Efek-efek yang diklasifikasikan pada biaya perolehan diamortisasi, setelah pengakuan awal, diamortisasi dengan menggunakan metode suku bunga efektif.

Pendapatan bunga diakui dalam laporan laba rugi dan penghasilan komprehensif lain dengan menggunakan metode suku bunga efektif.

Nilai wajar ditentukan berdasarkan harga kuotasi pasar yang berlaku. Manajemen akan menentukan nilai wajar efek-efek berdasarkan model yang dikembangkan secara internal dan estimasi terbaik, jika harga pasar yang dapat diandalkan tidak tersedia.

Lihat Catatan 3e untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

i. Efek-efek yang dibeli dengan janji dijual kembali

Efek-efek yang dibeli dengan janji dijual kembali *(reverse repo)* disajikan sebagai tagihan sebesar harga jual kembali yang disepakati dikurangi dengan selisih antara harga beli dan harga jual kembali yang disepakati (pendapatan bunga yang ditangguhkan) dan penyisihan kerugian penurunan nilai. Selisih antara harga beli dan harga jual kembali yang disepakati tersebut diamortisasi dengan menggunakan suku bunga efektif sebagai pendapatan bunga selama jangka waktu sejak efek-efek itu dibeli hingga saat dijual kembali.

Efek-efek yang dibeli dengan janji dijual kembali *(reverse repo)* diklasifikasikan sebagai aset keuangan yang diukur dengan biaya perolehan yang diamortisasi.

Lihat Catatan 3e untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

h. Marketable securities (continued)

If there is a decrease in fair value below its cost (including amortisation of premium and/or discount) of such marketable securities will not be fully recovered, a permanent decline in value is considered to have occurred and the individual security is impaired to its fair value. The impairment is recognised as loss in the current year's profit or loss and other comprehensive income.

Marketable securities classified as amortised cost, after initial recognition, are measured at their amortized cost using the effective interest rate method.

Interest income is recognized in the statements of profit or loss and other comprehensive income using the effective interest rate method.

Fair value is determined based on the prevailing market price quotation. Management will determine the fair value of securities based on internally developed models and best estimates, if reliable market prices are not available.

Refer to Note 3e for the accounting policies of financial assets and liabilities.

i. Securities purchased under agreements to resell

Securities purchased under resale agreements (reverse repo) are presented as receivables at the agreed resale price net of the difference between the purchase price and agreed resale price (unearned interest income) and allowance for impairment losses. The difference between the purchase price and the agreed resale price are amortised using effective interest rate as interest income over the period, commencing from the acquisition date to the resale date.

Securities purchased under resale agreements (reverse repo) are classified as financial assets measured at amortised cost.

Refer to Note 3e for the accounting policies of financial assets and liabilities.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

j. Kredit yang diberikan

Kredit yang diberikan diukur pada biaya perolehan diamortisasi menggunakan metode suku bunga efektif, dikurangi dengan penyisihan kerugian penurunan nilai. Biaya perolehan diamortisasi dihitung dengan memperhitungkan diskonto atau premi pada saat akuisisi dan biaya transaksi yang merupakan bagian tidak terpisahkan dari suku bunga efektif. Amortisasi diakui dalam laporan laba rugi dan penghasilan komprehensif lain. Penyisihan kerugian penurunan nilai dibentuk jika terdapat bukti objektif penurunan nilai.

Lihat Catatan 3e untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

Modifikasi kredit yang diberikan

Skema modifikasi kredit yang diberikan dapat berupa penyesuaian pada suku bunga, pokok bunga dan tunggakan bunga, perpanjangan jangka waktu jatuh tempo, penjadwalan kembali pembayaran angsuran serta modifikasi persyaratan kredit lainnya.

Setelah syarat dan ketentuan telah dinegosiasi ulang, penurunan nilai yang ada sebelumnya akan diukur dengan menggunakan suku bunga efektif awal sebelum ketentuan kredit dimodifikasi dan kredit tersebut tidak lagi dalam kategori "*past due*". Manajemen akan melakukan kaji ulang kredit yang direstrukturisasi secara berkelanjutan untuk memastikan bahwa seluruh syarat terpenuhi dan pembayaran di masa datang akan terjadi. Kredit tersebut akan dimasukkan dalam perhitungan penurunan nilai secara individual atau kolektif, yang dihitung dengan menggunakan suku bunga efektif awal dan mengikuti perlakuan atas perhitungan penurunan nilai kreditnya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

j. Loans

Loans are measured at amortised cost using the effective interest rate method, less allowance for impairment losses. Amortised cost is calculated by taking into account any discount or premium on acquisition and transaction costs that are an integral part of effective interest rate. The amortisation is recognised in profit and loss and other comprehensive income. Allowance for impairment losses is provided if there is an objective evidence of impairment.

Refer to Note 3e for the accounting policies of financial assets and liabilities.

Loan modification

Modification schemes for loans can be in the form of adjustment on interest rate, loan principal and past due interest, extension of repayment period, rescheduling of installments and other modification of the terms of the loans.

Once the terms have been renegotiated, any previous impairment is measured using the original Effective Interest Rate (EIR) as calculated before the modification of the terms and the loan is no longer considered "past due". Management continuously reviews renegotiated loans to ensure that all criteria are met and that the future payments are likely to occur. The loans continue to be subject to an individual or collective impairment assessment, which is calculated using the loan's original EIR and follow the impairment assessment of loans.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

j. Kredit yang diberikan (lanjutan)

Modifikasi kredit yang diberikan (lanjutan)

Jika persyaratan perjanjian suatu kredit dimodifikasi, maka Bank mengevaluasi apakah arus kas kontraktual dari kredit yang termodifikasi berbeda secara signifikan.

Jika arus kas berbeda secara signifikan, maka hak kontraktual atas arus kas dari aset keuangan yang original sebenarnya telah kadaluarsa. Dalam hal ini, aset keuangan yang original dihentikan pengakuannya dan aset keuangan yang baru diakui pada nilai wajar ditambah biaya transaksi yang memenuhi syarat. Imbalan yang diterima sebagai bagian dari modifikasi diperhitungkan sebagai berikut:

- Imbalan yang dipertimbangkan sewaktu menentukan nilai wajar dari aset baru dan imbalan yang merupakan pembayaran kembali (*reimbursement*) dari biaya transaksi yang memenuhi syarat akan dimasukkan sebagai pengakuan awal aset; dan

- Imbalan lainnya dimasukkan ke dalam laba rugi sebagai bagian dari keuntungan atau kerugian dari penghentian pengakuan.

Jika modifikasi aset keuangan yang diukur pada biaya perolehan diamortisasi tidak mengakibatkan penghentian pengakuan aset keuangan, maka Bank terlebih dahulu menghitung kembali nilai tercatat bruto aset keuangan menggunakan suku bunga efektif awal aset tersebut dan mengakui selisih penyesuaian sebagai keuntungan atau kerugian modifikasi di dalam laba rugi. Biaya atau imbalan yang terjadi dan imbalan modifikasi yang diterima disesuaikan ke nilai tercatat bruto dan diamortisasi selama sisa jangka waktu aset keuangan yang dimodifikasi.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

j. Loans (continued)

Loan modification (continued)

If the terms of a loan are modified, then the Bank evaluates whether the contractual cash flows of the modified asset are substantially different.

If the cash flows are substantially different, then the contractual rights to cash flows from the original financial asset are deemed to have expired. In this case the original financial asset is derecognised and a new financial asset is recognised at fair value plus any eligible transaction costs. Any fees received as part of the modification are accounted for as follows:

- *Fees that are considered in determining that fair value of the new asset and fees represent reimbursement of eligible transaction costs are included in the initial measurement of the asset; and*

- *Other fees are included in profit or loss as part of the gain or loss on derecognition.*

If the modification of a financial asset measured at amortised cost does not result in derecognition of the financial asset, then the Bank first recalculates the gross carrying amount of the financial asset using the original effective interest rate of the asset and recognises the resulting adjustment as modification gain or loss in profit or loss. Any costs or fees incurred and modification fees received are adjusted to the gross carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

j. Kredit yang diberikan (lanjutan)

Modifikasi kredit yang diberikan (lanjutan)

Jika modifikasi dilakukan karena alasan risiko kredit, maka keuntungan atau kerugian disajikan sebagai kerugian penurunan nilai. Selain karena alasan ini, keuntungan atau kerugian disajikan sebagai pendapatan bunga yang dihitung dengan menggunakan metode suku bunga efektif.

Dalam keadaan yang tidak biasa, setelah perubahan atau modifikasi yang mengakibatkan penghentian pengakuan aset keuangan awal, mungkin terdapat bukti bahwa aset modifikasian memburuk pada pengakuan awal. Dengan demikian, aset keuangan tersebut diakui sebagai aset keuangan yang memburuk pada pengakuan awal.

Beberapa kebijakan internal mengenai restrukturisasi kredit sebagai berikut:

- Restrukturisasi diberikan kepada debitur yang mengalami kesulitan pembayaran pinjaman baik pokok ataupun bunga pinjaman dan masih memiliki prospek usaha.
- Debitur wajib mengajukan permohonan restrukturisasi kepada Bank.
- Wajib dilakukan analisa ulang atas kemampuan pembayaran kewajiban dan *appraisal* ulang agunan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

j. Loans (continued)

Loan modification (continued)

If a modification is carried out because of credit-risk reason, then the gain or loss is presented together as impairment losses. In other cases, it is presented as interest income calculated using the effective interest rate method.

In some unusual circumstances, after changes or modifications that result in derecognition of the original financial asset, there may be evidence that the modified asset is credit impaired at initial recognition. Accordingly, the financial asset should be recognised as an originated credit impaired financial asset.

Some internal policies regarding loan restructuring are as follows:

- *Restructuring granted to debtors who have difficulty of loan payment for both loan principal or interest of loan and they still have business prospects.*
- *The debtors must submit an application of loan restructuring to the Bank.*
- *Mandatory conduct of a re-analysis of the ability of repayment obligations and re-appraisal of collateral.*

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

j. Kredit yang diberikan (lanjutan)

Modifikasi kredit yang diberikan (lanjutan)

Beberapa kebijakan internal mengenai restrukturisasi kredit sebagai berikut: (lanjutan)

- Keputusan restrukturisasi dilakukan oleh pejabat yang berbeda dari pemutus kredit awal.
- Wajib disempurnakan legalitas dan pengikatan agunan.
- Penetapan kualitas kredit setelah restrukturisasi mengacu kepada ketentuan Bank Indonesia terkini mengenai kualitas aktiva produktif.

Kredit yang diberikan dihapusbukukan, ketika kredit sudah masuk dalam kategori macet (kolektibilitas 5) dan tidak terdapat prospek yang realistis mengenai pengembalian di masa datang dan semua jaminan telah diupayakan untuk direalisasi atau sudah diambil alih. Kredit yang tidak dapat dilunasi dihapusbukukan dengan mendebit cadangan kerugian penurunan nilai.

Penerimaan kembali atas kredit yang telah dihapusbukukan, disajikan sebagai pendapatan operasional lainnya.

Perubahan atau modifikasi yang dilakukan karena risiko kredit, dapat dipertimbangkan sebagai indikasi aset keuangan yang berasal dari aset keuangan yang memburuk pada pengakuan awal. Sedangkan perubahan atau modifikasi yang dilakukan dengan dasar pertimbangan bisnis, mungkin tidak diakui sebagai aset keuangan yang memburuk pada pengakuan awal. Namun, penilaian ini perlu dilakukan secara menyeluruh untuk menentukan apakah pengakuan awal aset keuangan telah memburuk pada saat pengakuan awal.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

j. Loans (continued)

Loan modification (continued)

Some internal policies regarding loan restructuring are as follows: (continued)

- *Decision of the restructuring carried out by different officials from the initial loans authorized.*
- *Mandatory enhanced legal and binding of collateral.*
- *Determination of loans collectibility after restructuring refers to the latest Bank Indonesia regulations concerning the quality of earning assets.*

Loans are written-off, when loans have been included in loss category (collectibility 5) and there is no realistic prospect of collection in the near future and all collaterals that have been sought to be realized or taken over. When a loan is deemed uncollectible, it is written-off against the related allowance for impairment losses.

The recoveries of loans written-off are presented as other operational income.

Changes or modifications that were made on the basis of credit risk reason can be considered as an indication of originated credit-impaired financial assets. Meanwhile changes or modifications that were made on the basis of business' considerations, may not be recognised as originated credit-impaired financial assets. However, comprehensive evaluation should be performed to determine whether initial recognition of financial assets has deteriorated at initial recognition.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

k. Biaya dibayar dimuka

Biaya dibayar dimuka adalah biaya yang telah dikeluarkan tetapi belum diakui sebagai beban pada periode terjadinya.

Biaya dibayar dimuka akan diakui sebagai beban pada laporan laba rugi dan penghasilan komprehensif lain pada saat diamortisasi sesuai dengan masa manfaatnya menggunakan metode garis lurus (*straight-line method*).

l. Aset tetap

Bank menerapkan PSAK 216, "Aset Tetap". Untuk aset tetap, Bank memilih menggunakan metode biaya kecuali tanah dan bangunan dimana menggunakan metode revaluasi.

Aset tetap selain tanah dan bangunan disajikan sebesar harga perolehan dikurangi dengan akumulasi penyusutan dan penurunan nilai jika ada.

Biaya perolehan awal aset tetap meliputi biaya konstruksi atau harga pembelian dan setiap biaya diatribusikan secara langsung untuk membawa aset ke kondisi kerjanya dan lokasi untuk digunakan. Tanah dinyatakan sebesar harga perolehan dan tidak disusutkan.

Biaya legal awal untuk mendapatkan hak legal diakui sebagai bagian biaya akuisisi tanah, biaya-biaya tersebut tidak didepresiasikan. Biaya terkait dengan pembaharuan hak atas tanah diakui sebagai aset tak berwujud dan diamortisasi sepanjang umur hukum hak.

Semua biaya pemeliharaan dan perbaikan yang tidak memenuhi kriteria untuk dikapitalisasi diakui dalam laporan laba rugi dan penghasilan komprehensif lain pada saat terjadinya. Pada setiap akhir tahun buku, nilai residu, umur manfaat, dan metode penyusutan ditelaah kembali dan disesuaikan secara prospektif, sesuai dengan keadaannya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

k. Prepaid expenses

Prepaid expenses are expenses which have been incurred but have not been recognized as expenses in the related period.

Prepaid expenses are recognized as expenses in the statements of profit or loss and other comprehensive income during amortization in accordance with the expected beneficial period using the straight-line method.

l. Fixed assets

The Bank implemented SFAS 216, "Fixed Assets". For fixed assets, the Bank has chosen the cost method except for land and buildings which use revaluation method.

Fixed assets other than land and buildings are stated at historical cost less accumulated depreciation and impairment loss, if any.

The initial cost of the fixed assets consists of its construction cost or purchase price and any directly attributable costs of bringing the asset to its working condition and location for its intended use. Land is stated at historical cost and is not depreciated.

Initial legal costs to obtain legal rights is recognized as part of land acquisition costs, these costs are not depreciated. Costs related to the renewal of land rights are recognized as intangible assets and amortised over the legal term.

All maintenance and repair costs which do not fulfill the capitalization criteria, are recognized in profit or loss and other comprehensive income upon occurrence. At each financial year end, the assets' residual values, useful lives and methods of depreciation are reviewed and adjusted prospectively, as appropriate.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

l. Aset tetap (lanjutan)

Aset tetap dalam pembangunan dinyatakan sebesar biaya perolehan dan disajikan sebagai bagian dari "Aset tetap". Akumulasi biaya perolehan meliputi biaya konstruksi dan biaya langsung lainnya. Aset dalam pembangunan tidak disusutkan dan hanya akan direklasifikasi ke masing-masing aset tetap yang bersangkutan pada saat aset tersebut selesai dikerjakan dan siap digunakan sesuai dengan tujuannya.

Semua aset tetap kecuali tanah, disusutkan berdasarkan metode garis lurus selama estimasi masa manfaat aset tersebut sebagai berikut:

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

l. Fixed assets (continued)

Fixed assets under construction are stated at cost and are presented as part of "Fixed assets". The accumulated costs include cost of construction and other direct costs. Assets under construction are not depreciated and they will only be reclassified to the appropriate fixed asset account when the construction is completed and the constructed asset is ready for its intended use.

All fixed assets, except land, are depreciated using the straight-line method over their expected useful lives as follows:

	Tarif penyusutan/ *Depreciation rate*	**Tahun/*Years***	
Bangunan	5%	20	*Buildings*
Peralatan dan perabotan kantor	12,5 - 25%	4 - 8	*Office furnitures and fixtures*
Kendaraan	12,5 - 25%	4 - 8	*Vehicles*
Komputer	6,7 - 25%	4 - 15	*Computer*
Instalasi	12,5 - 25%	4 - 8	*Installation*

Pada setiap tanggal pelaporan, Bank melakukan penelaahan untuk menetapkan sisa masa manfaat, mengidentifikasi apakah terjadi perubahan di dalam nilai residu dan metode akuntansi, serta untuk memutuskan apakah terdapat indikasi penurunan nilai.

Apabila aset tetap tidak digunakan lagi atau dijual, maka nilai tercatat dan akumulasi penyusutannya dikeluarkan dari laporan posisi keuangan, dan keuntungan atau kerugian yang terjadi diakui dalam laporan laba rugi dan penghasilan komprehensif lain tahun berjalan.

Beban renovasi dan penambahan yang jumlahnya signifikan dicatat sebagai bagian dari nilai tercatat aset yang bersangkutan apabila kemungkinan besar Bank akan mendapatkan manfaat ekonomi masa depan dari aset tersebut yang melebihi standar kinerja yang diperkirakan sebelumnya.

At each reporting date, the Bank conducts an evaluation to define the remaining useful lives, identify whether there is a change in residual values and methods of accounting, as well as to decide whether there is any indication of impairment.

When assets are retired or otherwise disposed of, their carrying values and accumulated depreciation are eliminated from the statements of financial position and any gain or loss is recognized in profit or loss and other comprehensive income for the year.

Renovations and additions are recorded as part of the carrying amount of the related asset when the Bank will likely generate future economic benefits from those assets that exceed the performance standards expected.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

l. Aset tetap (lanjutan)

Apabila nilai tercatat aset lebih besar dari nilai yang dapat diperoleh kembali, nilai tercatat aset diturunkan menjadi sebesar nilai yang dapat diperoleh kembali, yang ditentukan sebagai nilai tertinggi antara nilai wajar dikurangi harga jual dan nilai yang dipakai.

Biaya bunga dan biaya pinjaman lainnya, seperti biaya diskonto pinjaman baik yang secara langsung atau tidak langsung digunakan untuk pendanaan konstruksi aset kualifikasian, dikapitalisasi hingga aset tersebut selesai dikonstruksi. Untuk biaya pinjaman yang dapat diatribusikan secara langsung pada aset kualifikasian, jumlah yang dikapitalisasi ditentukan dari biaya pinjaman aktual yang terjadi selama periode berjalan, dikurangi penghasilan yang diperoleh dari investasi sementara atas dana hasil pinjaman tersebut. Untuk pinjaman yang tidak dapat diatribusikan secara langsung pada suatu aset kualifikasian, jumlah yang dikapitalisasi ditentukan dengan mengalikan tingkat kapitalisasi terhadap jumlah yang dikeluarkan untuk memperoleh aset kualifikasian. Tingkat kapitalisasi dihitung berdasarkan rata-rata tertimbang biaya pinjaman yang dibagi dengan jumlah pinjaman yang tersedia selama periode, selain pinjaman yang secara spesifik diambil untuk tujuan memperoleh suatu aset kualifikasian.

Jumlah tercatat aset tetap dihentikan pengakuannya pada saat dilepaskan atau saat tidak ada manfaat ekonomis masa depan yang diharapkan dari penggunaan atau pelepasannya.

Laba atau rugi yang timbul dari penghentian pengakuan aset (dihitung dari selisih antara jumlah neto hasil pelepasan dan jumlah tercatat dari aset) diakui dalam laporan laba rugi dan penghasilan komprehensif lain pada tahun yang sama ketika aset tersebut dihentikan pengakuannya.

Bank menerapkan kebijakan akuntansi model revaluasi untuk aset tetap berupa tanah dan bangunan. Untuk aset tetap selain tanah dan bangunan menggunakan model biaya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

l. Fixed assets (continued)

If the asset's carrying amount is greater than its recoverable value, the carrying value of assets is lowered to the amount of the recoverable amount, determined as the higher of fair value less cost of disposal and value in use.

Interest expense and other borrowing costs, such as loan discount fees either directly or indirectly used to finance the construction of qualifying assets are capitalized until the assets are completely constructed. For borrowing costs that are directly attributable to qualifying assets, the capitalized amount is determined from the actual borrowing costs incurred during the period, net of income derived from investments while on the loan proceeds. For loans that are not directly attributable to a qualifying asset, the amount capitalized is determined by applying a capitalization rate to the amount spent to acquire qualifying assets. The capitalization rate is calculated based on the weighted average borrowing costs divided by the number of loans available over the period, in addition to loans specifically taken for the purpose of obtaining a qualifying asset.

An item of fixed assets is derecognised upon disposal or when no future economic benefits are expected from its use or disposal.

Any gain or loss arising from the derecognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is recognised in profit or loss and other comprehensive income in the year the asset is derecognised.

The Bank applies revaluation model as accounting policy for land and buildings. For fixed assets other than land and buildings, it applies cost model.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

l. Aset tetap (lanjutan)

Tanah dan bangunan disajikan sebesar nilai wajar, dikurangi akumulasi penyusutan untuk bangunan. Penilaian terhadap tanah dan bangunan dilakukan oleh penilai independen eksternal yang telah memiliki sertifikasi dan terdaftar di Otoritas Jasa Keuangan ("OJK"). Penilaian atas aset tersebut dilakukan secara berkala untuk memastikan bahwa nilai wajar aset yang direvaluasi tidak berbeda secara material dengan nilai tercatatnya. Akumulasi penyusutan pada tanggal revaluasi dieliminasi terhadap nilai tercatat bruto aset, dan nilai netonya disajikan kembali sebesar nilai revaluasian aset tetap.

Jika nilai wajar dari aset yang direvaluasi mengalami perubahan yang signifikan dan fluktuatif, maka perlu direvaluasi secara tahunan, sedangkan jika nilai wajar dari aset yang direvaluasi tidak mengalami perubahan yang signifikan dan fluktuatif, maka perlu dilakukan revaluasi paling kurang tiga tahun sekali.

Kenaikan nilai tercatat yang timbul dari revaluasi tanah dan bangunan dicatat sebagai "Surplus Revaluasi" dan disajikan sebagai "Pendapatan Komprehensif Lain". Penurunan nilai tercatat yang timbul dari revaluasi dicatat sebagai beban pada tahun berjalan. Apabila aset tersebut memiliki saldo "Surplus Revaluasi" yang disajikan sebagai "Pendapatan Komprehensif Lain", maka selisih penurunan nilai tercatat tersebut dibebankan terhadap "Surplus Revaluasi" dan sisanya diakui sebagai beban tahun berjalan.

Surplus revaluasi aset tetap yang termasuk dalam ekuitas dapat dipindahkan langsung ke saldo laba ketika aset tersebut dihentikan pengakuannya. Hal ini meliputi pemindahan sekaligus surplus revaluasi ketika penghentian atau pelepasan aset tersebut. Namun, sebagian surplus revaluasi tersebut dapat dipindahkan sejalan dengan penggunaan aset oleh Bank. Dalam hal ini, surplus revaluasi yang dipindahkan ke saldo laba adalah sebesar perbedaan antara jumlah penyusutan berdasarkan nilai revauasian aset dan jumlah penyusutan berdasarkan biaya perolehan awalnya. Pemindahan surplus revaluasi ke saldo laba tidak dilakukan melalui laba rugi.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

l. Fixed assets (continued)

Land and buildings are shown at fair value less subsequent depreciation for buildings. Valuation of land and buildings are performed by external independent appraisers with certain qualification and registered with Financial Services Authority ("OJK"). Valuations are performed with sufficient regularity to ensure the fair value of a revalued asset does not differ materially from its carrying amount. 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.

If the fair value of the revalued asset changes significantly, it is necessary to revalue on an annual basis, where as if the fair value of the revalued asset does not change significantly, it is necessary to revalue at a minimum every three years.

Increases in the carrying amount arising on revaluation of land and buildings is recorded in "Revaluation Surplus" and presented in "Other Comprehensive Income". Decrease in the carrying amount as result of revaluation is recorded as expense in the current year. If the asset has a balance on its "Revaluation Surplus", loss from revaluation of fixed asset is first charged to "Revaluation Surplus" which is presented as "Other Comprehensive Income" and the rest of the amount is charged to current year's profit or loss.

The revaluation surplus of fixed assets in equity can be transferred directly to the retained earnings when the asset derecognised. This includes the transfer of revaluation surplus when derecognised or upon disposal of fixed asset. However, some of the revaluation surplus can be reclassed in line with the Bank's use of fixed asset. In this case, the revaluation surplus transferred to the retained earnings is the amount of difference between depreciation based on the asset revaluation and the amount of depreciation based on the cost of its initial acquisition. The transfer of revaluation surplus to the retained earning is not through profit and loss.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

m. Agunan yang diambil alih (AYDA)

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 kredit yang diberikan yang telah diambil alih sebagai bagian dari penyelesaian kredit yang diberikan dan disajikan pada “Aset Lain-lain”.

Agunan yang diambil alih diakui sebesar nilai neto yang dapat direalisasi (*net realizable value*) atau sebesar nilai outstanding kredit yang diberikan, mana yang lebih rendah. Nilai neto yang dapat direalisasi adalah nilai wajar agunan yang diambil alih dikurangi dengan estimasi biaya untuk menjual agunan tersebut. Selisih lebih saldo kredit di atas nilai neto yang dapat direalisasi dari agunan yang diambilalih dibebankan ke dalam akun cadangan kerugian penurunan nilai aset. Selisih antara nilai agunan yang diambil alih dengan hasil penjualan diakui sebagai keuntungan atau kerugian pada saat penjualan.

Beban-beban yang berkaitan dengan pemeliharaan dan perbaikan AYDA dan properti dibebankan ke laporan laba rugi dan penghasilan komprehensif lain tahun berjalan pada saat terjadinya. Bila terjadi penurunan nilai yang bersifat permanen, maka nilai tercatatnya dikurangi untuk mengakui penurunan tersebut dan kerugiannya dibebankan pada laporan laba rugi dan penghasilan komprehensif lain tahun berjalan.

n. Aset tak berwujud

Aset tak berwujud diakui jika, dan hanya jika, biaya perolehan aset tersebut dapat diukur secara andal dan kemungkinan besar Bank akan memperoleh manfaat ekonomis masa depan dari aset tersebut.

Bank mengklasifikasikan aset tak berwujud dalam aset lain-lain, berupa perangkat lunak dan lisensi. Aset tak berwujud dicatat sebesar biaya perolehan dikurangi akumulasi amortisasi dan akumulasi rugi penurunan nilai, jika ada.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

m. Foreclosed collaterals

Foreclosed collaterals are the Bank's acquired assets, either through auctions or outside the auction based on voluntary submission by the owner of the collateral or by the power to sell outside of the auction of the owner of the collateral in the event that the debtor does not meet its obligations to the Bank. Foreclosed collaterals are collateral loans that were taken over as part of the settlement of loans and are presented in "Other Assets".

Foreclosed collaterals are stated at net realizable value or stated at loan outstanding amount, whichever is lower. Net realizable value is the fair value of the foreclosed collaterals less the estimated costs to sell the assets. The excess of loan receivable over the net realizable value of the foreclosed collaterals is charged to allowance for impairment losses. The difference between the recorded amount of the foreclosed collaterals and the proceeds from the sale of such collateral is recorded as a gain or loss at the time of sale.

Expenses for maintaining and repair of foreclosed collaterals and properties are charged to the current year's profit or and other comprehensive income as incurred. In the event of permanent impairment, the carrying amount is reduced to recognize the decline and the loss is charged to the statements of profit or loss and other comprehensive income.

n. Intangible assets

Intangible assets are recognised only when its cost can be measured reliably and it is probable that expected future benefits that are attributable to it will flow to the Bank.

The Bank classifies intangible assets in other assets, such as software and license. Intangible assets are stated at cost less accumulated amortization and accumulated impairment loss, if any.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

n. Aset tak berwujud (lanjutan)

Biaya perolehan perangkat lunak terdiri dari seluruh pengeluaran yang dapat dikaitkan langsung dalam persiapan perangkat lunak tersebut sehingga siap digunakan sesuai dengan tujuannya.

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.

Masa manfaat ekonomis, nilai residu dan metode amortisasi ditelaah setiap akhir tahun.

Perangkat lunak diamortisasi dengan menggunakan metode garis lurus selama estimasi umur manfaatnya, berdasarkan umur manfaat aset tak berwujud yang diestimasi sebagai berikut:

Amortisasi diakui dalam laporan laba rugi dan penghasilan komprehensif lain dengan menggunakan metode garis lurus, sejak tanggal perangkat lunak tersebut tersedia untuk dipakai sampai berakhirnya masa manfaat dari perangkat lunak tersebut.

Estimasi masa manfaat ekonomis perangkat lunak adalah selama 3-15 tahun atau dengan tarif penyusutan sebesar 6,7%-33,3%. Sedangkan estimasi masa manfaat ekonomis untuk lisensi dan merek dagang adalah sesuai dengan hak kontraktual masing-masing lisensi dan merek dagang tersebut, paling lama untuk 10 tahun atau dengan tarif penyusutan sebesar 10%.

Aset tak berwujud dihentikan pengakuannya jika:

a. Dilepas; atau

b. Tidak terdapat lagi manfaat ekonomi masa depan yang diharapkan dari penggunaan atau pelepasannya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

n. Intangible assets (continued)

Cost of software consists of all expenses directly attributable to the preparation of such software cost, until ready to be used for their intended purpose.

Subsequent expenditure on software is capitalized only when it increases the future economic benefits of the software, so that it becomes larger than originally expected performance standards. Expenditure with no addition of future economic benefits from the software is directly recognised as expenses when incurred.

The estimated useful lives, residual values and amortization method are reviewed at each financial year end.

Software is amortised by using straight-line method over the estimated useful life of software, based on the estimated useful lives of the fixed assets as follows:

Amortization is recognized in statements of profit or loss and comprehensive income using the straight line method, from the date that it is available for use until the economic benefits of software is ended.

Estimated economic useful life of software is for 3-15 years or with depreciation rate of 6.7%-33.3%. Meanwhile, estimated economic useful life of license and trademark is in accordance with the contractual rights of each license and trademark, with the longest time of 10 years or a depreciation rate of 10%.

Intangible asset is derecognized if it is:

a. Disposed; or

b. There is no expectation of future economic benefits when used or released.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

o. Penurunan nilai aset non-keuangan

Nilai tercatat aset non-keuangan ditelaah untuk penurunan nilai apabila terdapat kejadian atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat suatu aset tidak dapat dipulihkan. Jika ada indikasi seperti itu dan nilai tercatat suatu aset melebihi taksiran jumlah terpulihkan, aset atau unit penghasil kas diturunkan nilainya ke jumlah terpulihkan. Taksiran jumlah terpulihkan aset adalah yang lebih tinggi dari nilai wajar aset dan nilai pakai.

Nilai wajar adalah nilai yang diperoleh dari penjualan aset dalam transaksi yang wajar dikurangi biaya penjualan sedangkan nilai pakai adalah nilai kini dari estimasi arus kas masa mendatang yang diharapkan muncul dari penggunaan aset secara terus menerus dan dari penjualannya pada akhir masa pakainya.

Untuk aset yang tidak menghasilkan arus kas masuk independen yang besar, jumlah terpulihkan ditentukan untuk unit penghasil kas terkait aset tersebut. Rugi penurunan nilai diakui dalam laporan laba rugi dan penghasilan komprehensif lain. Dalam membuat taksiran nilai pakai, estimasi arus kas masa mendatang didiskontokan ke nilai sekarang dengan menggunakan tingkat diskonto sebelum pajak yang mencerminkan penilaian pasar saat ini dari nilai waktu dari uang dan risiko spesifik untuk aset.

Untuk aset non-keuangan tidak termasuk aset tak berwujud dengan masa manfaat tidak terbatas, penilaian dilakukan pada setiap tanggal pelaporan, apakah ada indikasi bahwa kerugian penurunan nilai yang sebelumnya diakui mungkin tidak lagi ada atau mungkin telah menurun. Jika indikasi tersebut terjadi, jumlah terpulihkan diperkirakan. Rugi penurunan nilai yang diakui sebelumnya dibalik hanya jika telah terjadi perubahan dalam estimasi yang digunakan untuk menentukan jumlah terpulihkan aset sejak rugi penurunan nilai terakhir diakui.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

o. Impairment of non-financial assets

The carrying values of non-financial assets are reviewed for impairment whenever events or changes in circumstances indicate that the carrying amount of an asset may not be recoverable. If such indication exists and where the carrying amount of an asset exceeds the estimated recoverable amount, the assets or cash-generating units are written down to their recoverable amount. The estimated recoverable amount of an asset is the higher of an asset's fair value less cost to sell and value-in-use.

The fair value is the amount obtainable from the sale of an asset in an arm's length transaction less costs of disposal while value-in-use is the present value of estimated future cash flows expected to arise from the continuing use of an asset and from its disposal at the end of its useful life.

For an asset that does not generate largely independent cash inflows, the recoverable amount is determined for the cash-generating unit to which the asset belongs. Impairment losses are recognised in profit or loss and other comprehensive income. 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.

For non-financial assets excluding intangible assets with indefinite useful life, an assessment is made at each reporting date as to whether there is any indication that previously recognised impairment losses may no longer exist or may have decreased. If such indication exists, the recoverable amount is estimated. A previously recognised impairment loss is reversed only if there has been a change in the estimates used to determine the asset's recoverable amount since the last impairment loss was recognised.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

o. Penurunan nilai aset non-keuangan (lanjutan)

Jika ini kasusnya, jumlah tercatat aset meningkat menjadi jumlah terpulihkan tersebut. Jumlah peningkatan tersebut tidak dapat melebihi nilai tercatat yang telah ditentukan, setelah dikurangi penyusutan atau amortisasi, sehingga seolah-olah kerugian penurunan nilai yang diakui untuk aset tahun-tahun sebelumnya tidak pernah terjadi.

Pembalikan tersebut diakui dalam laporan laba rugi dan penghasilan komprehensif lain kecuali aset dicatat pada nilai revaluasi, yang mana pembalikan diperlakukan sebagai peningkatan revaluasi. Setelah pembalikan itu, beban penyusutan atau amortisasi disesuaikan dalam tahun-tahun mendatang untuk mengalokasikan jumlah revisi nilai tercatat aset, dikurangi nilai sisa, secara sistematis atas sisa manfaatnya.

Aset tak berwujud dengan masa manfaat tidak terbatas diuji untuk penurunan nilai setiap tahun baik secara individu maupun di tingkat unit penghasil kas mana yang sesuai dan ketika keadaan mengindikasikan bahwa nilai tercatat mungkin mengalami penurunan nilai.

p. Liabilitas segera

Liabilitas segera merupakan liabilitas Bank yang harus segera dibayarkan kepada pihak lain berdasarkan kontrak atau perintah dari pihak yang mempunyai kewenangan untuk itu. Liabilitas segera diukur sebesar biaya perolehan diamortisasi.

Lihat Catatan 3e untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

q. Simpanan nasabah

Simpanan nasabah terdiri dari giro, tabungan dan deposito berjangka.

Giro merupakan dana nasabah yang dapat digunakan sebagai alat pembayaran dan penarikannya dapat dilakukan setiap saat melalui cek, atau dengan cara pemindahbukuan dengan bilyet giro atau sarana perintah pembayaran lainnya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

o. Impairment of non-financial assets (continued)

If that is the case, the carrying amount of the asset is increased to its recoverable amount. That increased amount cannot exceed the carrying amount that would have been determined, net of depreciation or amortisation, had no impairment loss been recognised for the asset in prior years.

Such reversal is recognised in profit or loss and other comprehensive income unless the asset is carried at revalued amount, in which case the reversal is treated as a revaluation increase. After such a reversal, the depreciation or amortisation expense is adjusted in future years to allocate the asset's revised carrying amount, less any residual value, on a systematic basis over its remaining useful life.

Intangible assets with indefinite useful lives are tested for impairment annually either individually or at the cash-generating unit level as appropriate and when circumstances indicate that the carrying value may be impaired.

p. Liabilities due immediately

Obligations due immediately represent obligations to third parties based on contract or order by those having authority that have to be settled immediately. Obligations due immediately are measured at their amortised cost.

Refer to Note 3e for the accounting policies of financial assets and liabilities.

q. Deposits from customers

Deposits from customers represent current accounts, savings and time deposits.

Demand deposits represent deposits from customers that can be used as instruments of payment and can be withdrawn at any time through cheques or transfer of funds with clearing account or other forms.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

q. Simpanan nasabah (lanjutan)

Tabungan merupakan dana nasabah yang bisa ditarik setiap saat berdasarkan persyaratan tertentu yang disepakati bersama.

Deposito berjangka merupakan simpanan nasabah yang dapat ditarik dalam jangka waktu tertentu berdasarkan kesepakatan antara nasabah dengan Bank.

Simpanan dari nasabah diklasifikasikan sebagai liabilitas keuangan yang diukur pada biaya perolehan diamortisasi. Lihat Catatan 3e untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

r. Simpanan dari bank lain

Simpanan dari bank lain terdiri dari kewajiban terhadap bank lain, dalam bentuk giro, deposito berjangka, tabungan dan *interbank call money*.

Simpanan dari bank lain diklasifikasikan sebagai liabilitas keuangan pada biaya perolehan diamortisasi. Lihat Catatan 3e untuk kebijakan akuntansi atas aset dan liabilitas keuangan.

s. Pendapatan dan beban provisi dan komisi

Pendapatan dan beban provisi dan komisi yang merupakan bagian dari suku bunga efektif instrumen keuangan, dimasukkan dalam perhitungan suku bunga efektif. Pendapatan dan beban ini diamortisasi sepanjang umur aset atau liabilitas keuangan, atau selama periode risiko.

Provisi dan komisi yang tidak berkaitan dengan kegiatan utama Bank diakui sebagai pendapatan atau beban pada saat terjadinya transaksi dan diklasifikasikan sebagai pendapatan operasional lainnya atau beban operasional lainnya.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

q. Deposits from customers (continued)

Savings accounts represent deposits from customers that can be withdrawn at any time based on certain conditions agreed by both parties.

Time deposits represent deposits from customers that can be withdrawn after a certain time in accordance with the agreement between the customers and the Bank.

Deposits from customers are classified as financial liabilities at amortised cost. Refer to Note 3e for the accounting policies of financial assets and liabilities.

r. Deposits from other banks

Deposits from other banks represent liabilities to other banks in the form of demand deposits, time deposits, saving and interbank call money.

Deposits from other banks are classified as financial liabilities at amortised cost. Refer to Note 3e for the accounting policies of financial assets and liabilities.

s. Provision and commission income and expense

Provision and commissions income and expense that are integral to the effective interest rate on a financial instrument are being taken into account in the calculation of the effective interest rate. These income and expense are amortised over the life of financial assets or liabilities or during the period of the risk.

Provision and commissions not related to the main activities of the Bank are recognised as revenues and expenses on the transaction date and classified under other operating income or other operating expenses.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

t. Pendapatan dan biaya lain-lain

Seluruh penghasilan dan beban lain-lain yang terjadi dibebankan pada laporan laba rugi dan penghasilan komprehensif lain pada saat terjadinya.

u. 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.

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 Bank memiliki hak ini ketika Bank memiliki hak untuk pengambilan keputusan yang relevan tentang 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 umur sewa.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

t. Other income and expenses

All of these other income and expenses are recorded in the statement of profit or loss and comprehensive income when incurred.

u. Lease

At the inception of a contract, the Bank assesses whether the contract is or contains a lease. A contract is or contains a lease if the contract conveys the right to control the use of an identified asset 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 assets.*

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 benefits 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 the right when it has the most relevant decision-making rights on how and for what purpose the asset is used during the period.*

The Bank recognises right-of-use asset and lease liability at the lease commencement date. The right-of-use is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payment made at or before the commencement date, plus any initial direct cost incurred. The right-of-use asset is amortised over the straight-line method throughout the useful life.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

u. Sewa (lanjutan)

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 *incremental*. Pada umumnya, Bank menggunakan suku bunga pinjaman *incremental* sebagai tingkat bunga diskonto.

Pembayaran sewa dialokasikan menjadi bagian pokok dan biaya keuangan. Biaya keuangan dibebankan pada laba rugi selama periode sewa sehingga menghasilkan tingkat suku bunga periodik yang konstan atas saldo liabilitas untuk setiap periode.

Jika sewa mengalihkan kepemilikan aset pendasar kepada 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 umur sewa.

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.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

u. Lease (continued)

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 the incremental borrowing rate. Generally, the Bank uses its incremental borrowing rate as a discount rate.

Each lease payment is allocated between the liability and finance cost. The finance cost is charged to profit or loss over the lease period so as to produce a constant periodic rate of interest on the remaining balance of the liability for each period.

If the lease transfers ownership of the underlying asset to the Bank by the end of the lease 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 useful life.

Leases modification

The Bank accounts for a lease modification as a separate lease if:

- *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 standalone price for the increase in scope and any appropriate adjustments to that standalone price to reflect the circumstances of the particular contract.*

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

v. Perpajakan

Perlakuan akuntansi atas pajak penghasilan sesuai dengan PSAK 212 (Revisi 2014), "Pajak Penghasilan".

Beban pajak terdiri dari pajak kini dan pajak tangguhan. Pajak diakui dalam laporan laba rugi, kecuali jika pajak tersebut terkait dengan transaksi atau kejadian yang diakui di penghasilan komprehensif lain atau langsung diakui ke ekuitas. Dalam hal ini, pajak tersebut masing-masing diakui dalam penghasilan komprehensif lain atau ekuitas.

Beban pajak kini dihitung berdasarkan peraturan perpajakan yang berlaku atau yang secara substantif berlaku pada akhir periode pelaporan. Manajemen secara periodik mengevaluasi posisi yang dilaporkan di Surat Pemberitahuan Tahunan ("SPT") sehubungan dengan situasi di mana aturan pajak yang berlaku membutuhkan interpretasi. Jika perlu, manajemen menentukan provisi berdasarkan jumlah yang diharapkan akan dibayar kepada otoritas pajak.

Pajak penghasilan tangguhan diakui sepenuhnya, dengan menggunakan metode liabilitas untuk semua perbedaan temporer yang berasal dari selisih antara dasar pengenaan pajak aset dan liabilitas dengan nilai tercatatnya pada laporan keuangan.

Namun, liabilitas pajak penghasilan tangguhan tidak diakui jika berasal dari pengakuan awal *goodwill.* Pajak penghasilan tangguhan juga tidak diperhitungkan jika pajak penghasilan tangguhan tersebut timbul dari pengakuan awal aset atau pengakuan awal liabilitas dalam transaksi yang bukan kombinasi bisnis yang pada saat transaksi tidak mempengaruhi laba akuntansi maupun laba kena pajak/rugi pajak.

Pajak penghasilan tangguhan diukur dengan menggunakan tarif pajak yang sudah diberlakukan atau secara substantif berlaku pada akhir periode pelaporan dan diekspektasi akan digunakan ketika aset pajak tangguhan yang berhubungan direalisasi atau liabilitas pajak tangguhan diselesaikan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

v. Taxation

Accounting treatment for income tax is in accordance with SFAS 212 (Revised 2014), "Income Tax".

Tax expense consists of current tax and deferred tax. Taxes are recognised in profit or loss, unless the tax is related to transactions or events that are recognised in other comprehensive income or recognised directly in equity. In this case, the tax is recognised in other comprehensive income or equity, respectively.

Current tax expense is calculated based on the tax laws that have been enacted or substantively enacted at the end of the reporting period. Management periodically evaluates positions reported in Annual Tax Returns ("SPT") with respect to situations where applicable in which tax regulations require interpretation. If necessary, Management determines provisions based on the amounts expected to be paid to the tax authorities.

Deferred income tax is recognised in full, using the liability method, for all temporary differences that arise from the difference between the tax bases of assets and liabilities and their carrying values in the financial statements.

However, deferred income tax liability is not recognised when it originates from the initial recognition of goodwill. Deferred income tax is also not taken into account if the deferred income tax arises from the initial recognition of an asset or a liability in a transaction that is not a business combination, which at the time of the transaction does not affect accounting profit or taxable profit/loss.

Deferred income tax is measured at the tax rates that have been enacted or substantively enacted at the end of the reporting period and are expected to be applied when the related deferred tax assets are realised or the deferred tax liability is settled.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

v. Perpajakan (lanjutan)

Aset pajak tangguhan diakui hanya jika kemungkinan jumlah penghasilan kena pajak di masa depan akan memadai untuk dikompensasi dengan perbedaan temporer yang masih dapat dimanfaatkan.

Liabilitas pajak tangguhan tidak diakui untuk perbedaan temporer antara nilai tercatat dan dasar pengenaan pajak dari investasi pada operasi asing ketika Bank bisa mengontrol periode pengembalian dari perbedaan temporer dan ada kemungkinan bahwa perbedaan itu tidak akan dibalik di masa depan yang dapat diperkirakan.

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 neto. Aset pajak kini dan liabilitas pajak kini akan saling hapus ketika Bank memiliki hak yang berkekuatan hukum untuk melakukan saling hapus dan adanya niat untuk melakukan penyelesaian saldo-saldo tersebut secara neto atau untuk merealisasikan dan menyelesaikan liabilitas secara bersamaan.

Manajemen mengevaluasi secara periodik posisi yang diambil dalam surat pemberitahuan tahunan terkait dengan situasi dimana peraturan perpajakan yang berlaku memerlukan interpretasi lebih lanjut. Cadangan akan dibentuk, jika dianggap perlu, berdasarkan jumlah yang diharapkan harus dibayarkan ke kantor pajak.

w. Imbalan kerja karyawan

Imbalan pasca kerja jangka pendek

Imbalan pasca kerja jangka pendek diakui pada saat terutang kepada karyawan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

v. Taxation (continued)

Deferred tax assets are recognised only to the extent that it is probable that the amount of future taxable income will be adequate to compensate for the temporary differences that can still be utilized.

Deferred tax liabilities are not recognised for temporary differences between the carrying amount and the tax base of investments in foreign operations when the Bank can control the payback period of the temporary differences and it is possible that the differences will not be reversed in the foreseeable future.

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. Current tax assets and current tax liabilities are offset when the Bank has a legally enforceable right to set-off and there is an intention to settle these balances on a net basis or to realise the asset and settle the liability simultaneously.

Management periodically evaluates positions taken in annual tax returns with respect to situations in which applicable tax regulations are subject to interpretation. Provisions are established, where appropriate, on the basis of amount expected to be paid to the tax authorities.

w. Employee benefit

Short-term post-employee benefits

Short-term post-employee benefits are recognized when they accrued to the employees.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

w. Imbalan kerja karyawan (lanjutan)

Imbalan pensiun dan imbalan pasca kerja lainnya

Bank menyelenggarakan program iuran pasti untuk seluruh karyawan tetapnya. Program pensiun dikelola oleh Dana Pensiun Lembaga Keuangan (DPLK) Manulife Indonesia. Kontribusi Bank dan karyawan masing-masing sebesar 13% dan 4% dihitung dari gaji dasar perbulan karyawan dan seluruhnya ditanggung oleh Bank. Kedua beban kontribusi dibukukan sebagai laba rugi.

Liabilitas iuran pasti yang diakui dalam laporan posisi keuangan adalah nilai kini liabilitas iuran pasti pada tanggal laporan posisi keuangan disesuaikan dengan keuntungan atau kerugian aktuarial.

Sehubungan dengan program imbalan pasti, 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*.

Keuntungan dan kerugian dari *curtailment* atau penyelesaian program manfaat pasti diakui ketika kurtailmen atau penyelesaian tersebut terjadi.

Pengukuran kembali dapat timbul dari perubahan pada asumsi-asumsi aktuarial yang dibebankan atau dikreditkan ke ekuitas di penghasilan komprehensif lain dan disajikan bagian dari penghasilan komprehensif lain di ekuitas.

Biaya jasa lalu diakui segera di laporan laba rugi dan penghasilan komprehensif lain.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

w. Employee benefit (continued)

Pension benefits and other post-employment benefit

The Bank established defined contribution plans covering all their permanent employees. The pension plans are managed by Financial Institution Pension Fund (DPLK) Manulife Indonesia. The pension plans are funded by contributions from the Bank's employees at 13% and 4% of employee's basic salaries per month, respectively and all borne by the Bank. Both contributions are charged to profit or loss.

The liability recognized in the statement of financial position in respect of a defined contribution plan is the present value of the defined contribution obligation at the statement of financial position date adjusted for actuarial gains or losses.

The liability recognized in the statement of financial position in respect of defined benefit pension plans is the present value of the defined benefit obligation at the end of the reporting period less the fair value of plan assets. The defined benefit obligation is calculated annually by independent actuaries using the projected unit credit method.

Gains and losses on the curtailment or settlement of a defined benefit plan are recognized when the curtailment or settlement occurs.

Remeasurement arising from experience adjustments and changes in actuarial assumptions are charged or credited to equity in other comprehensive income and presented as part of other comprehensive income in equity.

Past service costs are recognized immediately in the statements of profit or loss and other comprehensive income.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

w. Imbalan kerja karyawan (lanjutan)

Imbalan pensiun dan imbalan pasca kerja lainnya (lanjutan)

Bank menerapkan PSAK 219 (Revisi 2016) "Imbalan Pasca Kerja". Bank menghitung dan mencatat imbalan pasca kerja atas uang pesangon per 31 Desember 2025 dan 2024 sesuai dengan UU Cipta Kerja No. 11/2020. Imbalan pasca-kerja merupakan manfaat pasti yang dibentuk tanpa pendanaan khusus dan didasarkan pada masa kerja dan jumlah penghasilan karyawan pada saat pensiun. Metode penilaian aktuarial yang digunakan untuk menentukan nilai kini cadangan imbalan pasti, beban jasa kini yang terkait dan beban jasa lalu adalah metode *Projected Unit Credit*. Beban jasa kini, beban bunga, beban jasa lalu yang telah menjadi hak karyawan dan dampak kurtailmen atau penyelesaian (jika ada) diakui segera pada laporan laba rugi dan penghasilan komprehensif lain tahun berjalan. Beban jasa lalu yang belum menjadi hak karyawan diamortisasi selama jangka waktu rata-rata sisa masa kerja karyawan.

Bank mengakui keuntungan atau kerugian aktuaria dari liabilitas imbalan pasca kerja diakui secara langsung di dalam penghasilan komprehensif lain.

Bank mengakui laba atau rugi dari *curtailment* pada saat *curtailment* terjadi. Keuntungan atau kerugian *curtailment* terdiri dari perubahan yang terjadi dalam nilai kewajiban manfaat pasti dan keuntungan atau kerugian aktuaria dan biaya jasa lalu yang diakui sebelumnya.

x. Laba per saham (LPS)

Laba per saham dasar dihitung dengan membagi laba/(rugi) tahun berjalan yang tersedia bagi pemegang saham biasa (laba residual) dengan jumlah rata-rata tertimbang lembar saham biasa yang beredar selama tahun berjalan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

w. Employee benefit (continued)

Pension benefits and other post-employment benefit (continued)

The Bank has adopted SFAS 219 (Revised 2016) "Post-Employee Benefits". The Bank calculates and recognizes post-employment benefit obligation for severance pay as of December 31, 2025 and 2024 in accordance with Omnibus Law No. 11//2020. Post-employment benefits are unfunded in which amounts are determined based on years of service and salaries of the employees at the time of pension. The actuarial valuation method used to determine the present value of defined-benefit obligation, related current service costs and past service costs is the Projected Unit Credit. Current service costs, interest costs, past service costs which are already vested, and effects of curtailments and settlements (if any) are charged directly to current year's statement of profit or loss and other comprehensive income. Past service costs which are not yet vested for working (active) employees are amortised during the employees' average remaining years of service, until the benefits become vested.

The Bank has recognized actuarial gain or loss from post-employee benefit liability which shall be recognized directly in other comprehensive income.

The Bank has recognized gain or loss from curtailment when it occurred. Curtailment gain or loss consists of the changes that have occurred in value of defined benefit obligation and actuarial gain or loss and past service costs that have been recognized.

x. Earnings per share (EPS)

Basic earnings per share is computed by dividing income/(loss) for the year available to shareholders of ordinary shares (residual income) by the weighted average number of ordinary shares outstanding during the current year.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

x. Laba per saham (LPS) (lanjutan)

Laba per saham dilusian didasarkan pada asumsi bahwa saham biasa tambahan yang dikeluarkan sebagai hasil dari konversi saham konversi dan pelaksanaan waran saham sehingga meningkatkan jumlah saham biasa dan akibatnya menciptakan dilusi atas laba per saham dasar.

y. Informasi segmen

Bank menerapkan PSAK 108, "Segmen Operasi". PSAK revisi ini mengatur pengungkapan yang memungkinkan pengguna laporan keuangan untuk mengevaluasi sifat dan dampak keuangan dari aktivitas bisnis yang mana Bank terlibat dan lingkungan ekonomi dimana Bank beroperasi. Tidak terdapat dampak signifikan atas penerapan standar akuntansi yang direvisi tersebut terhadap laporan keuangan.

Segmen adalah bagian khusus dari Bank yang terlibat baik dalam menyediakan produk dan jasa (segmen usaha), maupun dalam menyediakan produk dan jasa untuk lingkungan ekonomi tertentu (segmen geografis), yang memiliki risiko dan imbalan yang berbeda dari segmen lainnya.

Jumlah setiap unsur segmen dilaporkan merupakan ukuran yang dilaporkan kepada manajemen untuk tujuan mengalokasikan sumber daya dalam satu segmen dan menilai kinerjanya.

Pendapatan, beban, laba rugi bersih, aset dan liabilitas segmen termasuk item-item yang dapat diatribusikan langsung kepada suatu segmen serta hal-hal yang dapat dialokasikan dengan dasar yang sesuai kepada segmen tersebut.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

x. Earnings per share (EPS) (continued)

Diluted earnings per share is based on the assumption that additional ordinary shares are issued as a result of conversion of convertible securities and exercise of share warrants thereby increasing the number of ordinary shares and consequently creating a dilution in the basic earnings per share.

y. Segment information

The Bank applied SFAS 108, "Operating Segments". The revised SFAS requires disclosures that will enable users of financial statements to evaluate the nature and financial effects of the business activities in which the Bank engages and the economic environments in which it operates. There is no significant impact on the adoption of the revised accounting standard on the financial statements.

A segment is a distinguishable component of the Bank that is engaged either in providing certain products and services (business segment), or in providing products and services within a particular economic environment (geographical segment), which is subject to risks and rewards that are different from those of other segments.

The amount of each segment item reported shall be the measure reported to the management for the purposes of allocating resources to the segment and assessing its performance.

Segment revenue, expenses, net income, assets and liabilities include items directly attributable to a segment as well as those that can be allocated on a reasonable basis to that segment.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

z. Pengakuan pendapatan dan beban bunga

Pendapatan dan beban bunga untuk semua instrumen keuangan dengan *interest bearing* dicatat dalam pendapatan bunga dan beban bunga di dalam laporan laba rugi dan penghasilan komprehensif lain menggunakan metode suku bunga efektif.

Beban bunga yang berkaitan langsung dengan kegiatan simpanan nasabah, seperti *referral code* untuk deposito berjangka atau beban bunga yang berhubungan dengan jangka waktu tertentu, diamortisasi sesuai dengan jangka waktu kontrak menggunakan metode suku bunga efektif dan diklasifikasikan sebagai bagian dari beban bunga pada laporan laba rugi dan penghasilan komprehensif lain.

Pendapatan bunga atas aset keuangan yang diukur dengan nilai wajar melalui penghasilan komprehensif lain atau biaya perolehan diamortisasi yang mengalami penurunan nilai setelah pengakuan awal *(stage 3)* diakui berdasarkan suku bunga efektif kredit yang disesuaikan.

Tingkat bunga ini dihitung dengan cara yang sama dalam perhitungan suku bunga efektif kecuali bahwa cadangan kerugian kredit ekspektasian sudah termasuk dalam arus kas ekspektasian. Oleh karenanya, pendapatan bunga diakui atas aset keuangan dalam klasifikasi biaya perolehan diamortisasi termasuk kerugian kredit ekspektasian.

Dalam kondisi risiko kredit atas aset keuangan *stage 3* mengalami perbaikan sehingga aset keuangan tidak lagi dipertimbangkan mengalami penurunan nilai, pengakuan pendapatan bunga dihitung berdasarkan nilai tercatat bruto aset keuangan.

Metode suku bunga efektif adalah metode yang digunakan untuk menghitung biaya perolehan diamortisasi dari aset keuangan atau kewajiban keuangan dan metode untuk mengalokasikan pendapatan bunga atau beban bunga selama periode yang relevan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

z. Recognition of interest income and expense

Interest income and expense for all interest-bearing financial instruments are recorded in interest income and interest expense in the profit or loss and other comprehensive income using the effective interest method.

Interest expense directly related to deposits from customers activities, i.e. time deposits referral code or interest expense which relates to a specific period, is amortised over the term of contract using the effective interest rate method and classified as part of interest expense in profit or loss and other comprehensive income.

Interest income for financial assets that are either measured at fair value through other comprehensive income or amortised cost that have become credit impaired subsequent to initial recognition (stage 3) is recognised using the credit adjusted effective interest rate.

This rate is calculated in the same manner as the effective interest rate except that expected credit losses are included in the expected cash flows. Interest income is therefore recognised on the amortised cost of the financial asset including expected credit losses.

Should the credit risk on a stage 3 financial asset improve such that the financial asset is no longer considered credit impaired, interest income recognition reverts to a computation based on the rehabilitated carrying value of the financial assets - gross.

The effective interest method is a method used for calculating the amortised cost of a financial asset or financial liability after allocating the interest income or interest expense over the relevant period.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

z. Pengakuan pendapatan dan beban bunga (lanjutan)

Suku bunga efektif adalah suku bunga yang secara tepat mendiskontokan estimasi pembayaran atas penerimaan kas di masa datang selama perkiraan umur dari instrumen keuangan, atau jika lebih tepat digunakan periode yang lebih singkat untuk memperoleh nilai tercatat bersih dari aset keuangan atau kewajiban keuangan. Pada saat menghitung suku bunga efektif, Bank mengestimasi arus kas dengan mempertimbangkan seluruh persyaratan kontraktual dalam instrumen keuangan tersebut (seperti pelunasan dipercepat, opsi beli (*call option*) dan opsi serupa lainnya), 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 peristiwa kerugian penurunan nilai, maka pendapatan bunga yang diperoleh setelahnya diakui berdasarkan suku bunga yang digunakan untuk mendiskonto arus kas masa datang dalam menghitung penurunan nilai.

aa. Pendapatan dan beban operasional lainnya

Pendapatan operasional lainnya terdiri dari pendapatan *fee* ATM, pendapatan administrasi rekening, pendapatan provisi dan komisi lainnya, penerimaan kembali aset yang telah dihapusbukukan, dan pendapatan dari denda keterlambatan pembayaran pinjaman.

Beban provisi dan komisi lainnya

Beban provisi dan komisi lainnya meliputi biaya layanan dan komisi kredit.

Beban tenaga kerja

Beban tenaga kerja meliputi beban berupa gaji karyawan, bonus, lembur dan tunjangan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

z. Recognition of interest income and expense (continued)

The effective interest rate is the rate that exactly discounts estimated payment of future cash receipts through the expected life of the financial instrument, or when it is more appropriate to use a shorter period to the net carrying amount of the financial asset or financial liability. When calculating the effective interest rate, the Bank estimates cash flows considering all contractual terms of the financial instrument (such as early repayment, the option to buy (call option) and other similar options) but does not consider future credit losses. This calculation includes all commissions, fees and points 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.

If a financial asset or group of similar financial assets has been impaired as a result of impairment loss events, interest income earned thereafter is recognized based on the interest rate used to discount future cash flows in calculating the impairment.

aa. Other operating income and expenses

Other operating income consists of ATM fee income, accounts administration income, other fees and commission income, recoveries of assets previously written-off, and penalty income from late loan repayment.

Other provision and commission expenses

Other provision and commission expenses include loan service fees and commissions.

Personnel expenses

Personnel expenses include expenses related to salaries for employees, bonuses, overtime and allowances.

3. IKHTISAR INFORMASI KEBIJAKAN AKUNTANSI MATERIAL (lanjutan)

Kebijakan akuntansi yang material yang diterapkan secara konsisten dalam penyusunan laporan keuangan adalah sebagai berikut: (lanjutan)

aa. Pendapatan dan beban operasional lainnya (lanjutan)

Beban umum dan administrasi

Beban umum dan administrasi merupakan beban yang timbul sehubungan dengan aktivitas kantor dan operasional Bank.

Beban pemasaran

Beban pemasaran meliputi beban iklan, sponsorship, promosi dan beban media sehubungan dengan pemasaran produk Bank.

Seluruh pendapatan dan beban yang terjadi dibebankan sebagai laba/rugi pada saat terjadinya.

ab. Liabilitas dan aset kontinjensi

Liabilitas kontinjensi tidak diakui dalam laporan keuangan tetapi diungkapkan, kecuali jika kemungkinan arus kas keluar sumber daya yang mengandung manfaat ekonomi sangat kecil. Aset kontinjensi tidak diakui namun diungkapkan dalam laporan keuangan ketika kemungkinan arus masuk yang mengandung manfaat ekonomi kemungkinan besar terjadi.

ac. Biaya emisi saham

Biaya yang terjadi sehubungan dengan penerbitan modal saham Bank kepada publik dikurangkan langsung dengan hasil emisi dan disajikan sebagai pengurang tambahan modal disetor dalam laporan posisi keuangan.

ad. Properti Terbengkalai

Properti terbengkalai adalah aset dalam bentuk properti yang dimiliki Bank adalah aset tetap dalam bentuk properti yang dimiliki Bank, tetapi bagian properti tersebut secara mayoritas tidak digunakan untuk kegiatan operasional Bank.

Bank mengukur properti terbengkalai pada nilai lebih rendah antara jumlah tercatat dan nilai wajar setelah dikurangi biaya untuk menjual.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES INFORMATION (continued)

The material accounting policies that are consistently applied in the preparation of the financial statements are as follows: (continued)

aa. Other operating income and expenses (continued)

General and administrative expenses

General and administrative expenses represent expenses related to office activities and the Bank's operational activities.

Marketing expenses

Marketing expenses represent advertising, sponsorship, promotion and media expenses related to the Bank's product marketing.

All of these income and expenses are recorded as profit/loss when incurred.

ab. Contingent assets and liabilities

Contingent liabilities are not recognized in the financial statements but are disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote. Contingent assets are not recognized but are disclosed in the financial statement when an inflow of economic benefits is probable.

ac. Share issuance costs

Cost incurred in connection with the Banks issuance of share capital to the public were offset directly with the proceeds and presented as deduction to additional paid-in capital in the statement of financial position.

ad. Abandoned Properties

Abandoned properties represent fixed assets in the form of properties owned by the Bank, but the majority of the property is not used for the Bank's operational activities.

The bank measures abandoned properties at the lower of the carrying amount and fair value less costs to sell.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI AKUNTANSI YANG SIGNIFIKAN

Penyusunan laporan keuangan Bank mengharuskan manajemen untuk membuat pertimbangan, estimasi dan asumsi yang mempengaruhi jumlah yang dilaporkan dari pendapatan, beban, aset dan liabilitas, dan pengungkapan atas liabilitas kontinjensi, pada akhir periode pelaporan.

Ketidakpastian mengenai asumsi dan estimasi tersebut dapat mengakibatkan penyesuaian material terhadap nilai tercatat aset dan liabilitas yang terpengaruh pada periode pelaporan berikutnya.

Pertimbangan

Perpajakan

Ketidakpastian atas interpretasi dari peraturan pajak yang kompleks, perubahan peraturan pajak dan jumlah dan timbulnya penghasilan kena pajak di masa depan, dapat menyebabkan penyesuaian di masa depan atas penghasilan dan beban pajak yang telah dicatat.

Pertimbangan juga dilakukan dalam menentukan penyisihan atas pajak penghasilan badan. Terdapat transaksi dan perhitungan tertentu yang penentuan pajak akhirnya adalah tidak pasti sepanjang kegiatan usaha normal.

Pada tanggal 31 Desember 2025 dan 2024, Bank mengutilisasi rugi fiskal untuk mengkompensasi penghasilan kena pajak periode berjalan yang dilaporkan.

Penjelasan lebih rinci mengenai pajak penghasilan diungkapkan dalam Catatan 19.

Pajak dibayar dimuka dan keberatan atas hasil pemeriksaan pajak

Berdasarkan peraturan perpajakan yang berlaku saat ini, manajemen mempertimbangkan apakah jumlah yang tercatat pada pajak dibayar dimuka dapat dipulihkan dan dikembalikan oleh Kantor Pajak. Bank mencatat pajak dibayar dimuka untuk tahun pajak 2018 dan telah menerima pengembalian di 2024. Pengungkapan terkait pajak dibayar dimuka dan keberatan atas hasil pemeriksaan pajak diungkapkan pada Catatan 19.f.

Opsi pembaruan dan penghentian dalam kontrak - sebagai penyewa

Bank menentukan masa sewa sesuai masa sewa yang tidak dapat terbatalkan, ditambah dengan setiap periode yang dicakup oleh opsi untuk memperpanjang sewa jika cukup pasti untuk mengeksekusi, atau setiap periode yang dicakup oleh opsi untuk menghentikan sewa, jika cukup pasti untuk tidak mengeksekusi opsi tersebut.

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS

The preparation of the Bank's financial statements requires management to make judgments, estimates and assumptions that affect the reported amounts of revenues, expenses, assets and liabilities, and the disclosures of contingent liabilities, at the end of the reporting periods.

Uncertainty about these assumptions and estimates could result in outcomes that may require material adjustments to the carrying amounts of the assets and liabilities affected in future period.

Judgements

Taxation

Uncertainties exist with respect to the interpretation of complex tax regulations, changes in tax laws, and the amount and timing of future taxable income, could necessitate future adjustments to tax income and expense already recorded.

Judgment is also involved in determining the provision for corporate income tax. There are certain transactions and computation for which the ultimate tax determination is uncertain during the ordinary course of business.

As of December 31, 2025 and 2024, the Bank have utilized tax losses carried forward to compensate current period's taxable income reported.

Further details regarding taxation are disclosed in Note 19.

Prepaid taxes and tax assessments under appeal

Based on the tax regulations currently enacted, the management judged if the amounts recorded under prepaid taxes are recoverable and refundable by the Tax Office. Bank recorded prepaid taxes for fiscal year 2018 and has received refund in 2024. Disclosures related to prepaid taxes and tax assessments under appeal are disclosed in Note 19.f.

Lease term of contracts with renewal and termination options - as lessee

The Bank determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it is reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI YANG SIGNIFIKAN (lanjutan)

Pertimbangan (lanjutan)

Opsi pembaruan dan penghentian dalam kontrak - sebagai penyewa (lanjutan)

Bank memiliki beberapa kontrak sewa yang mencakup opsi perpanjangan dan terminasi. Bank menerapkan pertimbangan dalam mengevaluasi apakah secara wajar akan menggunakan opsi untuk memperbarui atau mengakhiri sewa. Bank mempertimbangkan semua faktor relevan yang membentuk insentif ekonomi untuk melakukan pembaruan atau penghentian. Setelah tanggal permulaan, Bank menilai kembali masa sewa jika terdapat peristiwa atau perubahan signifikan yang berada dalam kendalinya dan mempengaruhi kemampuannya untuk menjalankan atau tidak menggunakan opsi untuk memperbarui atau untuk mengakhiri.

Pengungkapan lebih lanjut mengenai sewa terdapat pada Catatan 12 dan Catatan 18.

Asumsi utama masa depan dan sumber utama estimasi ketidakpastian lain pada tanggal pelaporan yang memiliki risiko signifikan bagi penyesuaian yang material terhadap nilai tercatat aset dan liabilitas untuk tahun berikutnya diungkapkan di bawah ini. Bank mendasarkan asumsi dan estimasi pada parameter yang tersedia pada saat laporan keuangan disusun. Asumsi dan situasi mengenai perkembangan masa depan mungkin berubah akibat perubahan pasar atau situasi di luar kendali Bank. Perubahan tersebut dicerminkan dalam asumsi terkait pada saat terjadinya.

Estimasi dan Asumsi

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.*

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS (continued)

Judgements (continued)

Lease term of contracts with renewal and termination options - as lessee (continued)

The Bank has several lease contracts that include extension and termination options. The Bank applies judgment in evaluating whether it is reasonably certain to exercise the option to renew or terminate the lease or not. The Bank considers all relevant factors that create an economic incentive for them to exercise either the renewal or termination. After the commencement date, the Bank reassesses the lease term if there is a significant event or change in circumstances that is within its control and affects its ability to exercise or not to exercise the option to renew or to terminate.

Further disclosures of leases are made in Note 12 and Note 18.

The key assumptions concerning the future and other key sources of uncertainty of estimation at the reporting date that have a significant risk of causing material adjustments to the carrying amounts of assets and liabilities within the next financial year are disclosed below. The Bank based its assumptions and estimates on parameters available when the consolidated financial statements were prepared. Existing circumstances and assumptions about future developments may change due to market changes or circumstances arising beyond the control of the Bank. Such changes are reflected in the assumptions when they occur.

Estimates and Assumptions

Allowances 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.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Cadangan kerugian penurunan nilai aset keuangan (lanjutan)

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 3e untuk kebijakan akuntansi atas penurunan nilai aset keuangan.

(Liabilitas)/Aset pajak tangguhan

(Liabilitas)/Aset pajak tangguhan diakui atas jumlah penghasilan pajak yang dapat dipulihkan di masa yang akan datang sebagai akibat perbedaan temporer. Pertimbangan manajemen diperlukan untuk menentukan jumlah (Liabilitas)/aset pajak tangguhan yang dapat diakui, berdasarkan kemungkinan terjadinya dan tingkat laba fiskal di masa mendatang sejalan dengan rencana strategis masa depan.

Pada tanggal 31 Desember 2025 dan 2024, Bank memiliki akumulasi rugi fiskal yang dapat dikompensasi dengan penghasilan kena pajak di masa depan sampai dengan lima tahun sejak rugi fiskal tersebut dilaporkan.

Penyusutan aset tetap

Biaya perolehan aset tetap, termasuk tanaman produktif, disusutkan dengan menggunakan metode garis lurus berdasarkan taksiran masa manfaat ekonomisnya. Manajemen mengestimasi masa manfaat ekonomis aset tetap antara 4 sampai dengan 30 tahun, yang merupakan umur yang secara umum diharapkan dalam perbankan. Perubahan tingkat pemakaian dan perkembangan teknologi dapat mempengaruhi masa manfaat ekonomis dan nilai sisa aset, dan karenanya beban penyusutan masa depan mungkin direvisi.

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Allowances for impairment losses of financial assets (continued)

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;*
- *Estimating debtor's cash flows in the calculation of individual impairment.*

Refer to Note 3e for accounting policy on impairment of financial assets.

Deferred tax (liabilities)/assets

Deferred tax (liabilities)/assets are recognized for the future recoverable taxable income arising from temporary difference. Management judgment is required to determine the amount of deferred tax (liabilities)/assets that can be recognized, based upon the likely timing and level of future taxable profits together with future strategic planning.

As of December 31, 2025 and 2024, Bank has accumulated tax losses carried forward which can be utilized against future taxable income up to five years since the tax loss reported.

Depreciation of Fixed Assets

The costs of fixed assets, including bearer plants, are depreciated on a straight-line basis over their estimated useful lives. Management estimates the useful lives of these fixed assets to be within 4 to 30 years, which are common life expectancies applied in the banking industry. Changes in the expected level of usage and technological development could impact the economic useful lives and the residual values of these assets, and therefore future depreciation charges could be revised.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Penyusutan aset tetap (lanjutan)

Nilai tercatat neto atas aset tetap Bank pada tanggal 31 Desember 2025 dan 2024 adalah sebesar Rp213.573 dan Rp212.416. Penjelasan lebih rinci atas aset tetap diungkapkan dalam Catatan 12.

Program Pensiun dan Imbalan Kerja

Pengukuran liabilitas imbalan kerja Bank bergantung pada pemilihan asumsi yang digunakan oleh aktuaris independen dalam menghitung jumlah-jumlah tersebut. Asumsi tersebut termasuk antara lain, tingkat diskonto, tingkat kenaikan gaji tahunan, tingkat pengunduran diri karyawan tahunan, tingkat kecacatan, umur pensiun dan tingkat kematian. Keuntungan atau kerugian aktuarial yang timbul dari penyesuaian dan perubahan dalam asumsi-asumsi aktuarial diakui secara langsung pada laporan posisi keuangan konsolidasian dengan debit atau kredit ke saldo laba melalui pendapatan komprehensif lain dalam periode terjadinya.

Sementara Bank berkeyakinan bahwa asumsi tersebut adalah wajar dan sesuai, perbedaan signifikan pada hasil aktual atau perubahan signifikan dalam asumsi yang ditetapkan Bank dapat mempengaruhi secara material liabilitas diestimasi atas pensiun dan imbalan kerja dan beban imbalan kerja neto.

Nilai tercatat neto liabilitas imbalan kerja Bank pada tanggal 31 Desember 2025 dan 2024 adalah sebesar Rp25.030 dan Rp22.540. Penjelasan lebih rinci atas imbalan kerja diungkapkan dalam Catatan 20.

Estimasi atas Suku Bunga Pinjaman Inkremental dari Suatu Sewa

Bank tidak dapat langsung menentukan tingkat bunga implisit dalam sewa, oleh karena itu, Bank menggunakan SBPI untuk mengukur liabilitas sewa. SBPI adalah tingkat bunga yang harus dibayar oleh Bank untuk meminjam dalam jangka waktu yang sama.

Dengan demikian, SBPI mencerminkan tingkat bunga yang harus dibayar oleh Bank, yang perlu diestimasi ketika tidak ada tingkat bunga yang dapat langsung diamati atau ketika tingkat bunga perlu disesuaikan untuk mencerminkan persyaratan dan kondisi sewa.

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Depreciation of Fixed Assets (continued)

The net carrying amount of the Bank's fixed assets as of December 31, 2025 and 2024 was Rp213,573 and Rp212,416, respectively. Further details on fixed asset are disclosed in Note 12.

Pension Plan and Employee Benefits

The measurement of the Bank's employee benefits liability is dependent on its selection of certain assumptions used by the independent actuaries in calculating such amounts. Those assumptions include among others, discount rates, future annual salary increase, annual employee turn-over rate, disability rate, retirement age and mortality rate. Actuarial gains or losses arising from experience adjustments and changes in actuarial assumptions are recognized immediately in the consolidated statement of financial position with a corresponding debit or credit to retained earnings through other comprehensive income the the period in which they occur.

While the Bank believes that its assumptions are reasonable and appropriate, significant differences in the Bank's actual experiences or significant changes in the Bank's assumptions may materially affect its estimated liabilities for pension and employee benefits and net employee benefits expense.

The net carrying amount of the Bank's employee benefits liability as of December 31, 2025 and 2024 was Rp25,030 and Rp22,540. Further details on employee benefits are disclosed in Note 20.

Estimating the Incremental Borrowing Rate of a Lease

The Group cannot readily determine the interest rate implicit in the lease, therefore, it uses its IBR to measure lease liabilities. The IBR is the rate of interest that the Group would have to pay to borrow over a similar term.

The IBR therefore reflects interest the Group would have to pay, which requires estimation when no observable rates are available or when they need to be adjusted to reflect the terms and conditions of the lease.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Estimasi atas Suku Bunga Pinjaman Inkremental dari Suatu Sewa (lanjutan)

Bank menetapkan estimasi SBPI menggunakan input yang dapat diamati (seperti suku bunga pasar) jika tersedia dan diharuskan untuk membuat estimasi spesifik untuk entitas tertentu jika diperlukan.

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.

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.

Penurunan nilai aset keuangan

Perhitungan cadangan penurunan nilai kolektif meliputi kerugian kredit yang melekat dalam portofolio aset keuangan dengan karakteristik ekonomi yang sama ketika terdapat bukti objektif penurunan nilai, tetapi penurunan nilai secara individu belum dapat diidentifikasi. Dalam menilai kebutuhan untuk cadangan kolektif, Manajemen mempertimbangkan faktor-faktor seperti kualitas kredit dan jenis produk. Guna membuat estimasi cadangan yang diperlukan, manajemen membuat asumsi untuk menentukan kerugian yang melekat, dan untuk menentukan parameter input yang diperlukan, berdasarkan pengalaman masa lalu dan kondisi ekonomi saat ini.

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Estimating the Incremental Borrowing Rate of a Lease (continued)

The Bank estimates the IBR using observable inputs (such as market interest rates) when available and is required to make certain entity-specific estimates as necessary.

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.

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 on the result of independent appraisal and estimated time and cash received from selling the foreclosed assets. Each impaired asset will be measured based on its merits, and the workout strategy and estimated cash flows considered recoverable.

Impairment of financial assets

Collectively assessed impairment allowances cover credit losses inherent in portfolios of financial assets with similar economic characteristics when there is objective evidence to suggest that they contain impaired financial assets, but the individual impaired items cannot yet be identified. In assessing the need for collective allowances, Management considers factors such as credit quality and type of product. In order to estimate the required allowance, assumptions are made to define the way inherent losses are modelled and to determine the required input parameters, based on historical experiences and current economic conditions.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Penurunan nilai aset keuangan (lanjutan)

Keakuratan penyisihan tergantung pada seberapa baik estimasi arus kas masa depan untuk pihak-pihak tertentu dan asumsi model dan parameter yang digunakan dalam menentukan penyisihan kolektif.

Bank menetapkan pinjaman yang diberikan yang harus dievaluasi penurunan nilainya secara individual, jika memenuhi salah satu kriteria di bawah ini:

- Pinjaman yang diberikan yang secara individual memiliki nilai pinjaman diatas Rp10 miliar (nilai penuh); atau
- Pinjaman yang diberikan yang direstrukturisasi yang secara individual memiliki nilai pinjaman diatas Rp10 miliar (nilai penuh).

Metode perhitungan penurunan nilai secara individual akan mempertimbangkan 2 (dua) skenario kemungkinan pengembalian, yaitu: (i) skenario dasar dan (ii) skenario buruk. Pembuatan skenario dilakukan dengan menggunakan metode *discounted cash flow* (DCF) dan mempertimbangkan *confidence level* yang menggambarkan kondisi industri dan Perusahaan terkait. Nantinya ECL yang dihasilkan oleh masing-masing skenario akan dirata-ratakan secara tertimbang terhadap bobot skenario yang telah diatur.

Menentukan nilai wajar instrumen keuangan

Dalam menentukan nilai wajar aset keuangan dan liabilitas yang tidak mempunyai harga pasar, Bank menggunakan teknik penilaian seperti yang dijelaskan dalam (Catatan 3e). Untuk instrumen keuangan yang jarang diperdagangkan dan memiliki informasi harga yang terbatas, nilai wajar menjadi kurang objektif dan membutuhkan berbagai tingkat penilaian tergantung pada likuiditas, konsentrasi, faktor ketidakpastian pasar, asumsi harga dan risiko lainnya.

Masukan untuk model ini berasal dari data pasar yang bisa diamati. Bila data pasar yang bisa diamati tersebut tidak tersedia, Manajemen mempertimbangkan masukan dan asumsi diperlukan untuk menentukan nilai wajar. Pertimbangan tersebut mencakup feedback model atas likuiditas volatilitas untuk transaksi derivatif dan tingkat diskonto yang berjangka waktu panjang, tingkat pelunasan dipercepat dan asumsi tingkat gagal bayar.

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Impairment of financial assets (continued)

The accuracy of the allowances depends on how well these estimates of future cash flows for specific counterparties and the model assumptions and parameters are used in determining collective allowances.

The Bank determines that loans should be evaluated for impairment through individual evaluation if one of the following criteria is met:

- *Loans which individually have loan value more than Rp10 billion (full amount); or*
- *Restructured loans which individually loan value more than Rp10 billion (full amount).*

The individual impairment calculation method will consider 2 (two) possible return scenarios, namely: (i) base scenario and (ii) adverse scenario. Scenario development is carried out using the discounted cash flow (DCF) method and considers confidence levels that describes the conditions of the industry and related companies. Then, the ECL generated by each scenario will be averaged on a weighted basis against the set scenario weights.

Determining fair values of financial instruments

In determining the fair value for financial assets and financial liabilities for which there is no observable market price, the Bank uses the valuation techniques as described in (Note 3e). For financial instruments that are traded infrequently and a lack of price transparency, fair value is less objective and requires varying degrees of judgement depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument.

The input for this model comes from observable market data. When observable market data are not available, Management considers necessary inputs and assumptions to determine the fair value. The above considerations include liquidity and volatility feedback model for derivative transactions and long term discount rate, the level of early payment and the level of default assumption.

4. PERTIMBANGAN, ESTIMASI, DAN ASUMSI YANG SIGNIFIKAN (lanjutan)

Estimasi dan Asumsi (lanjutan)

Revaluasi aset tetap

Revaluasi aset tetap Bank bergantung pada pemilihan asumsi yang digunakan oleh penilai independen dalam menghitung jumlah-jumlah tersebut. Asumsi tersebut termasuk antara lain: tingkat diskonto, nilai tukar, tingkat inflasi dan tingkat kenaikan pendapatan dan biaya.

Bank berkeyakinan bahwa asumsi tersebut adalah wajar dan sesuai, perbedaan signifikan dalam asumsi yang ditetapkan Bank dapat mempengaruhi secara material nilai aset tetap yang direvaluasi.

Penurunan nilai aset non-keuangan

Bank mengevaluasi penurunan nilai aset apabila terdapat kejadian atau perubahan keadaan yang mengindikasikan bahwa nilai tercatat aset tidak dapat dipulihkan kembali. Faktor-faktor penting yang dapat menyebabkan penelaahan penurunan nilai adalah sebagai berikut:

a. Performa yang tidak tercapai secara signifikan terhadap ekspektasi historis atau proyeksi hasil operasi di masa yang akan datang;

b. Perubahan yang signifikan dalam cara penggunaan aset atau strategi bisnis secara keseluruhan; dan

c. Industri atau tren ekonomi yang secara signifikan bernilai negatif.

Bank mengakui kerugian penurunan nilai apabila nilai tercatat aset melebihi nilai yang dapat dipulihkan. Jumlah terpulihkan adalah nilai yang lebih tinggi antara nilai wajar dikurang biaya untuk menjual dengan nilai pakai aset (atau unit penghasil kas). Jumlah terpulihkan diestimasi untuk aset individual atau, jika tidak memungkinkan, untuk unit penghasil kas yang mana aset tersebut merupakan bagian dari pada unit tersebut.

Properti terbengkalai

Bank mengukur properti terbengkalai pada nilai lebih rendah antara jumlah tercatat dan nilai wajar setelah dikurangi biaya untuk menjual. Properti terbengkalai yang mengalami penurunan nilai dinilai sesuai dengan Standar Akuntansi Keuangan dan regulasi yang berlaku.

Beban-beban yang berkaitan dengan pemeliharaan properti terbengkalai dibebankan ke laporan laba rugi dan penghasilan komprehensif lain pada saat terjadinya.

4. SIGNIFICANT ACCOUNTING JUDGEMENTS, ESTIMATES, AND ASSUMPTIONS (continued)

Estimates and Assumptions (continued)

Fixed asset revaluation

The Bank's fixed assets revaluation depends on its selection of certain assumptions used by the independent appraisal in calculating such amounts. Those assumptions include among others, discount rate, exchange rate, inflation rate and revenue and cost increase rate.

The Bank believes that its assumptions are reasonable and appropriate and significant differences in the Bank's assumptions may materially affect the valuation of its fixed assets.

Impairment of non-financial assets

The Bank assesses impairment of assets whenever events or changes in circumstances that would indicate that the carrying amount of an asset may not be recoverable. The factors that the Bank considers important which could trigger an impairment review include the following:

a. Significant under performance relative to expected historical or projected future operating results;

b. Significant changes in the manner of use of the acquired assets or the strategy for overall business; and

c. Significant negative industry or economic trends.

The Bank recognizes an impairment loss whenever the carrying amount of an asset exceeds its recoverable amount. The recoverable amount is the higher of an asset's (or cash-generating unit's) fair value less costs to sell and its value in use. Recoverable amounts are estimated for individual assets or, if it is not possible, for the cash-generating unit to which the asset belongs.

Abandoned properties

The bank measures abandoned properties at the lower of the carrying amount and fair value less costs to sell. Impaired abandoned properties assessed in accordance with applicable Financial Accounting Standards and regulations.

Expenses for maintaining abandoned properties are recognised in the current year statements of profit or loss and other comprehensive income as incurred.

5. KAS / *5. CASH*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	9.760	12.133	*Rupiah*

Pada tanggal 31 Desember 2025 dan 2024, saldo kas termasuk uang pada Anjungan Tunai Mandiri (ATM) masing-masing sebesar Rp770 dan Rp888.

As of December 31, 2025 and 2024, total cash includes cash in Automatic Teller Machine (ATM) amounted to Rp770 and Rp888, respectively.

Bank telah mengasuransikan seluruh kas yang dimiliki termasuk kas pada ATM kepada PT Asuransi Staco Mandiri, pihak ketiga, dengan nilai pertanggungan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp17.650 dan Rp19.500.

The Bank has insured all of its cash including cash in ATM to PT Asuransi Staco Mandiri, which are third parties, with sum insured as of December 31, 2025 and 2024 amounting to Rp17,650 and Rp19,500, respectively.

Manajemen berpendapat bahwa pertanggungan asuransi untuk kas yang dimiliki Bank telah memadai.

Management believes that the insurance coverage for the Bank's cash is adequate.

6. GIRO PADA BANK INDONESIA / *6. CURRENT ACCOUNTS WITH BANK INDONESIA*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	1.144.566	1.274.118	*Rupiah*

Giro Wajib Minimum (GWM) Bank sesuai dengan Peraturan Bank Indonesia dan Peraturan Anggota Dewan Gubernur (PADG) diungkapkan pada Catatan 44.

Minimum Statutory Reserves (GWM) of the Bank in accordance with Bank Indonesia Regulation and Regulation of Member of the Board of Governors (PADG) are disclosed in Note 44.

7. GIRO PADA BANK LAIN / *7. CURRENT ACCOUNTS WITH OTHER BANKS*

a. Berdasarkan nama Bank / *a. By counterparty Bank name*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			*Third parties*
Rupiah			*Rupiah*
PT Bank Central Asia Tbk	52.155	78.797	*PT Bank Central Asia Tbk*
PT Bank Mandiri (Persero) Tbk	2.157	1.477	*PT Bank Mandiri (Persero) Tbk*
PT Bank Negara Indonesia (Persero) Tbk	113	111	*PT Bank Negara Indonesia (Persero) Tbk*
PT Bank Maybank Indonesia Tbk	96	96	*PT Bank Maybank Indonesia Tbk*
Standard Chartered Bank	64	88	*Standard Chartered Bank*
PT Bank Tabungan Negara (Persero) Tbk	4	215	*PT Bank Tabungan Negara (Persero) Tbk*
PT Bank Danamon Indonesia Tbk	3	3	*PT Bank Danamon Indonesia Tbk*
PT Bank KB Bukopin Syariah	2	-	*PT Bank KB Bukopin Syariah*
PT Bank Pembangunan Daerah Banten (Perseroda) Tbk	1	2	*PT Bank Pembangunan Daerah Banten (Perseroda) Tbk*
Jumlah	**54.595**	**80.789**	***Total***

7. GIRO PADA BANK LAIN (lanjutan)

b. Berdasarkan kolektibilitas

Tidak terdapat giro pada bank lain yang diblokir dan dijadikan sebagai jaminan pada tanggal 31 Desember 2025 dan 2024.

Pada tanggal 31 Desember 2025 dan 2024, kolektabilitas giro pada bank lain sesuai dengan peraturan OJK diungkapkan pada Catatan 44.

c. Tingkat suku bunga rata-rata per tahun

Tingkat suku bunga rata-rata per tahun untuk tahun:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	0,05%	0,01%	*Rupiah*

d. Cadangan kerugian penurunan nilai

Manajemen berpendapat bahwa seluruh giro pada bank lain dapat ditagih, berada dalam *stage* 1 sehingga penyisihan kerugian penurunan nilai tidak diperlukan.

7. CURRENT ACCOUNTS WITH OTHER BANKS (continued)

b. By collectibility

There were no current accounts with other banks which were pledged and used as collateral as of December 31, 2025 and 2024, respectively.

As of December 31, 2025 and 2024, collectability of current accounts with other Banks in accordance with OJK regulation are disclosed in Note 44.

c. Annual average interest rates

The annual average interest rates for year:

8. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN

a. Berdasarkan jenis

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			*Third parties*
Rupiah			*Rupiah*
Deposit facility	1.363.404	156.000	*Deposit facility*
Call Money	500.000	-	*Call Money*
Dikurangi:			*Less:*
Diskonto yang belum diamortisasi	(142)	(23)	*Unamortised discounts*
	1.863.262	155.977	
Deposito berjangka	129	127	*Time deposit*
	1.863.391	**156.104**	

8. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS

a. By type

8. PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN (lanjutan)

8. PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS (continued)

b. Berdasarkan pihak lawan

b. By counterparties

Pihak Lawan/*Counterparties*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Nilai wajar/ *Fair value*
		31 Desember 2025/*December 31, 2025*		
Bank Indonesia	3,75%	31/12/2025	02/01/2026	1.363.262
PT Bank Rakyat Indonesia (Persero) Tbk	4,65%	31/12/2025	06/01/2026	500.000
PT Bank Maybank Indonesia Tbk	2,00%	13/12/2025	13/01/2026	129
				1.863.391
		31 Desember 2024/*December 31, 2024*		
Bank Indonesia	5,25%	31/12/2024	02/01/2025	155.977
PT Bank Maybank Indonesia Tbk	2,00%	13/12/2024	13/01/2025	127
				156.104

c. Berdasarkan kolektibilitas

Seluruh penempatan pada Bank Indonesia dan bank lain pada tanggal 31 Desember 2025 dan 2024 masing-masing diklasifikasikan *stage* 1, memiliki jatuh tempo kurang dari 1 (satu) bulan dan tidak ada penempatan pada Bank Indonesia dan bank lain yang diblokir dan digunakan sebagai jaminan.

Pada tanggal 31 Desember 2025 dan 2024, kolektabilitas penempatan pada Bank Indonesia dan bank lain sesuai dengan peraturan OJK diungkapkan pada Catatan 44.

c. By collectibility

All placements with Bank Indonesia and other banks as of December 31, 2025 and 2024 were classified as stage 1, has maturity of less than 1 (one) month and there are no placements with Bank Indonesia and other banks that are pledged and used as collateral, respectively.

As of December 31, 2025 and 2024, collectability of placements with Bank Indonesia and other banks in accordance with OJK regulation are disclosed in Note 44.

d. Kisaran suku bunga efektif per tahun

Kisaran suku bunga efektif per tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

d. Annual range of effective interest rate

The range of annual effective interest rate for the years ended December 31, 2025 and 2024 were as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Rupiah	2,00%-4,65%	2,00%-5,25%	*Rupiah*

e. Cadangan kerugian penurunan nilai

Manajemen berpendapat bahwa tidak terdapat penurunan nilai atas penempatan pada Bank Indonesia dan bank lain, sehingga tidak diperlukan cadangan kerugian penurunan nilai pada tanggal-tanggal 31 Desember 2025 dan 2024.

e. Allowance for impairment losses

Management believes that there is no impairment of placements with Bank Indonesia and other banks, as such no allowance for impairment losses was required as of December 31, 2025 and 2024.

9. EFEK-EFEK / *9. MARKETABLE SECURITIES*

a. Berdasarkan jenis dan mata uang / *a. By type and currency*

	31 Desember 2025/*December 31, 2025*		
	Nilai tercatat/ *Carrying value)**	**Biaya perolehan diamortisasi atau Nilai wajar/ *Amortised cost or Fair value***	
Rupiah			***Rupiah***
Biaya perolehan diamortisasi:			***Amortised cost:***
Sekuritas Rupiah			*Bank Indonesia*
Bank Indonesia (SRBI)	2.274.763	2.274.763	*Rupiah Securities (SRBI)*
Obligasi korporasi			*Corporate bonds*
Obligasi non bank	207.000	207.000	*Non bank bonds*
	2.481.763	2.481.763	
Nilai wajar melalui penghasilan komprehensif lain:			***Fair value through other comprehensive income:***
Sekuritas Rupiah			*Bank Indonesia*
Bank Indonesia (SRBI)	2.617.605	2.619.058	*Rupiah Securities (SRBI)*
Surat Utang Negara (SUN)	2.014.082	2.084.966	*Government Bonds (SUN)*
Obligasi korporasi :			*Corporate bonds:*
Obligasi non bank	357.098	360.891	*Non bank bonds*
Obligasi bank	20.000	19.998	*Bank bonds*
	5.008.785	5.084.913	
Sub jumlah	**7.490.548**	**7.566.676**	***Sub total***
Cadangan kerugian penurunan nilai	-	(2)	*Allowance for impairment losses*
Jumlah	**7.490.548**	**7.566.674**	***Total***

*) Nilai tercatat merupakan nilai perolehan setelah amortisasi atas premium/diskon

**) Carrying value represents acquisition cost after amortization of premium/discount*

	31 Desember 2024/*December 31, 2024*		
	Nilai tercatat/ *Carrying value)**	**Biaya perolehan diamortisasi atau Nilai wajar/ *Amortised cost or Fair value***	
Rupiah			***Rupiah***
Biaya perolehan diamortisasi:			***Amortised cost:***
Sekuritas Rupiah			*Bank Indonesia*
Bank Indonesia (SRBI)	1.888.672	1.888.672	*Rupiah Securities (SRBI)*
Nilai wajar melalui penghasilan komprehensif lain:			***Fair value through other comprehensive income:***
Surat Utang Negara (SUN)	2.629.250	2.577.126	*Government Bonds (SUN)*
Obligasi korporasi			*Corporate bonds*
Obligasi non bank	218.204	216.154	*Non bank bonds*
	2.847.454	2.793.280	
Jumlah	**4.736.126**	**4.681.952**	***Total***

*) Nilai tercatat merupakan nilai perolehan setelah amortisasi atas premium/diskon

**) Carrying value represents acquisition cost after amortization of premium/discount*

9. EFEK-EFEK (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Berikut adalah perubahan efek-efek untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024:

9. MARKETABLE SECURITIES (continued)

a. By type and currency (continued)

The following are changes in securities for the years ended December 31, 2025 and 2024:

	31 Desember 2025/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Biaya perolehan diamortisasi:					***Amortised cost:***
Saldo awal	1.888.672	-	-	1.888.672	*Beginning balance*
Pengukuran kembali	115.898	-	-	115.898	*Remeasurement*
Aset keuangan yang baru dibeli	9.813.555	-	-	9. 813.555	*New financial assets purchased*
Aset keuangan jatuh tempo	(9.336.362)	-	-	(9.336.362)	*Financial assets matured*
Saldo akhir	**2.481.763**	**-**	**-**	**2.481.763**	***Ending balance***
Nilai wajar melalui penghasilan komprehensif lain:					***Fair value through other comprehensive income:***
Saldo awal	2.793.280	-	-	2.793.280	*Beginning balance*
Pengukuran kembali	130.302	-	-	130.302	*Remeasurement*
Aset keuangan yang baru dibeli	3.911.254	-	-	3.911.254	*New financial assets purchased*
Aset keuangan yang dijual	(597.968)	-	-	(597.968)	*Financial assets sold*
Aset keuangan jatuh tempo	(1.151.955)	-	-	(1. 151.955)	*Financial assets matured*
Saldo akhir	**5.084.913**	**-**	**-**	**5.084.913**	***Ending balance***

	31 Desember 2024/*December 31, 2024*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Biaya perolehan diamortisasi:					***Amortised cost:***
Saldo awal	49.131	-	-	49.131	*Beginning balance*
Pengukuran kembali	88.458	-	-	88.458	*Remeasurement*
Aset keuangan yang baru dibeli	6.499.508	-	-	6.499.508	*New financial assets purchased*
Aset keuangan jatuh tempo	(4.748.425)	-	-	(4.748.425)	*Financial assets matured*
Saldo akhir	**1.888.672**	**-**	**-**	**1.888.672**	***Ending balance***
Nilai wajar melalui penghasilan komprehensif lain:					***Fair value through other comprehensive income:***
Saldo awal	3.298.951	-	-	3.298.951	*Beginning balance*
Pengukuran kembali	(66.446)	-	-	(66.446)	*Remeasurement*
Aset keuangan yang dijual	(148.225)	-	-	(148.225)	*Financial assets sold*
Aset keuangan jatuh tempo	(291.000)	-	-	(291.000)	*Financial assets matured*
Saldo akhir	**2.793.280**	**-**	**-**	**2.793.280**	***Ending balance***

9. EFEK-EFEK (lanjutan)

a. Berdasarkan jenis dan mata uang (lanjutan)

Harga pasar efek-efek dalam kelompok nilai wajar melalui penghasilan komprehensif lain berkisar antara, 95,77%-128,11% dan 92,08%-120,88%, masing-masing dari nilai nominal pada tanggal-tanggal 31 Desember 2025 dan 2024.

Bank mengakui adanya keuntungan atau kerugian yang belum direalisasi atas peningkatan atau penurunan nilai pasar efek-efek dalam kelompok nilai wajar melalui penghasilan komprehensif lain (bersih setelah pajak) keuntungan sebesar Rp101.642 dan kerugian sebesar Rp51.828, masing-masing untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024.

b. Berdasarkan hubungan

Pada tanggal 31 Desember 2025 dan 2024 tidak terdapat efek-efek pada pihak berelasi.

c. Berdasarkan penerbit

Sekuritas Rupiah Bank Indonesia:

9. MARKETABLE SECURITIES (continued)

a. By type and currency (continued)

The market prices for the marketable securities classified as fair value through other comprehensive income marketable securities ranged between 95.77%-128.11% and 92.08%-120.88%, of the nominal value as of December 31, 2025 and 2024, respectively.

The Bank recognized unrealized gain or loss from the increase or decrease in market value of fair value through other comprehensive income marketable securities (net after tax) gain amounting Rp101,642 and loss amounting Rp51,828 for the years ended December 31, 2025 and 2024, respectively.

b. By relationship

As December 31, 2025 and 2024, there were no marketable securities with related parties.

c. By issuer

Bank Indonesia Rupiah Securities:

Seri/*Series*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Biaya perolehan diamortisasi atau nilai wajar/ *Amortised cost or fair value*	
				31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*
Biaya perolehan diamortisasi/ *Amortised cost:*					
IDSR150526364S	4,62%	17/11/2025	15/05/2026	196.638	-
IDSR150526364S	4,82%	25/09/2025	15/05/2026	161.877	-
IDSR040525367S	4,60%	27/10/2025	04/05/2026	147.698	-
IDSR060226364S	5,55%	04/08/2025	06/02/2026	142.621	-
IDSR040525367S	4,60%	14/11/2025	04/05/2026	123.449	-
IDSR020126364S	4,78%	16/12/2025	02/01/2026	99.987	-
IDSR190126367S	4,76%	02/10/2025	19/01/2026	99.765	-
IDSR060326364S	4,75%	31/12/2025	06/03/2026	99.163	-
IDSR060326364S	5,08%	04/09/2025	06/03/2026	99.120	-
IDSR230326367S	4,75%	31/12/2025	23/03/2026	98.943	-
IDSR230326367S	4,79%	29/12/2025	23/03/2026	98.934	-
IDSR150526364S	4,79%	30/12/2025	15/05/2026	98.249	-
IDSR150526364S	4,85%	24/12/2025	15/05/2026	98.229	-
IDSR040525367S	5,56%	04/08/2025	04/05/2026	81.814	-
IDSR060226364S	5,82%	16/07/2025	06/02/2026	74.577	-
IDSR230326367S	5,10%	10/09/2025	23/03/2026	69.522	-
IDSR030726364S	4,87%	22/12/2025	03/07/2026	66.525	-
IDSR020126364S	5,70%	21/07/2025	02/01/2026	49.992	-
IDSR060326364S	4,58%	13/11/2025	06/03/2026	49.599	-
IDSR040525367S	4,60%	14/11/2025	04/05/2026	49.231	-
IDSR030626364S	4,64%	24/11/2025	03/06/2026	49.038	-
IDSR230326367S	4,78%	29/12/2025	23/03/2026	45.911	-
IDSR100426364S	5,52%	01/08/2025	10/04/2026	37.969	-
IDSR190126367S	5,70%	21/07/2025	19/01/2026	29.917	-
IDSR170726364S	4,69%	20/10/2025	17/07/2026	27.033	-
IDSR060226364S	5,82%	16/07/2025	06/02/2026	24.859	-
IDSR060226364S	4,67%	20/10/2025	06/02/2026	20.681	-
IDSR020126364S	5,70%	21/07/2025	02/01/2026	19.997	-
IDSR060326364S	4,79%	24/12/2025	06/03/2026	9.916	-
IDSR100426364S	4,77%	06/10/2025	10/04/2026	3.509	-

9. EFEK-EFEK (lanjutan)

9. MARKETABLE SECURITIES (continued)

c. Berdasarkan penerbit (lanjutan)

c. By issuer (continued)

Sekuritas Rupiah Bank Indonesia: (lanjutan)

Bank Indonesia Rupiah Securities: (continued)

Seri/*Series*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Biaya perolehan diamortisasi atau nilai wajar/ *Amortised cost or fair value*	
				31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*
Biaya perolehan diamortisasi/ ***Amortised cost:***					
IDSR170125364S	6,85%	06/11/2024	17/01/2025	-	99.700
IDSR140225273S	6,83%	07/11/2024	14/02/2025	-	99.181
IDSR020625185S	7,00%	02/12/2024	02/06/2025	-	97.145
IDSR100625186S	7,09%	09/12/2024	10/06/2025	-	96.959
IDSR110625364S	7,10%	09/12/2024	11/06/2025	-	96.936
IDSR210225364S	7,00%	31/12/2024	21/02/2025	-	79.215
IDSR310125364S	6,97%	31/12/2024	31/01/2025	-	76.453
IDSR100125364S	6,85%	01/11/2024	10/01/2025	-	74.873
IDSR070325182S	7,05%	09/09/2024	07/03/2025	-	74.078
IDSR310125364S	6,81%	26/11/2024	31/01/2025	-	59.664
IDSR020125183S	6,80%	22/10/2024	02/01/2025	-	49.991
IDSR020125183S	6,82%	18/11/2024	02/01/2025	-	49.991
IDSR020125183S	6,82%	02/12/2024	02/01/2025	-	49.991
IDSR030125364S	6,83%	11/11/2024	03/01/2025	-	49.981
IDSR080125182S	7,32%	11/07/2024	08/01/2025	-	49.931
IDSR100125182S	7,31%	15/07/2024	10/01/2025	-	49.912
IDSR170125364S	6,83%	14/11/2024	17/01/2025	-	49.850
IDSR170125364S	6,82%	02/12/2024	17/01/2025	-	49.850
IDSR170125364S	6,85%	11/12/2024	17/01/2025	-	49.849
IDSR240125364S	6,82%	30/10/2024	24/01/2025	-	49.786
IDSR240125364S	6,83%	14/11/2024	24/01/2025	-	49.785
IDSR310125364S	6,82%	05/11/2024	31/01/2025	-	49.720
IDSR310125273S	6,81%	29/11/2024	31/01/2025	-	49.720
IDSR310125273S	6,85%	09/12/2024	31/01/2025	-	49.717
IDSR310125182S	7,10%	05/08/2024	31/01/2025	-	49.714
IDSR140225364S	6,86%	08/11/2024	14/02/2025	-	49.588
IDSR140225364S	6,84%	29/11/2024	14/02/2025	-	49.588
IDSR280225273S	6,83%	18/11/2024	28/02/2025	-	49.460
IDSR140325273S	7,26%	19/06/2024	14/03/2025	-	49.311
IDSR040425273S	6,90%	08/11/2024	04/04/2025	-	49.133
IDSR070325182S	7,04%	09/09/2024	07/03/2025	-	24.693
IDSR170125364S	6,92%	31/12/2024	17/01/2025	-	9.969
IDSR050325273S	7,30%	07/06/2024	05/03/2025	-	4.938
				2.274.763	**1.888.672**
Nilai wajar melalui penghasilan komprehensif lain/ ***Fair value through other comprehensive income:***					
IDSR150526364S	4,62%	10/11/2025	15/05/2026	196.508	-
IDSR060326364S	6,26%	05/06/2025	06/03/2026	148.772	-
IDSR140826364S	4,65%	17/11/2025	14/08/2026	145.599	-
IDSR100426364S	5,54%	07/08/2025	10/04/2026	121.034	-
IDSR190126367S	5,87%	14/07/2025	19/01/2026	99.783	-
IDSR060226364S	6,06%	02/07/2025	06/02/2026	99.547	-
IDSR060326364S	6,25%	16/06/2025	06/03/2026	99.181	-
IDSR150526364S	5,37%	14/08/2025	15/05/2026	98.254	-
IDSR150526364S	5,03%	01/09/2025	15/05/2026	98.254	-
IDSR030626364S	6,27%	16/06/2025	03/06/2026	98.010	-
IDSR030626364S	5,10%	04/09/2025	03/06/2026	98.010	-
IDSR030726364S	4,87%	22/12/2025	03/07/2026	97.603	-
IDSR140826364S	4,65%	10/11/2025	14/08/2026	97.066	-
IDSR020926364S	4,69%	24/11/2025	02/09/2026	96.812	-
IDSR021026364S	4,83%	30/12/2025	02/10/2026	96.415	-
IDSR161026364S	4,92%	24/12/2025	16/10/2026	96.238	-
IDSR161026364S	4,83%	30/12/2025	16/10/2026	96.238	-
IDSR201126364S	4,72%	24/11/2025	20/11/2026	95.771	-
IDSR200226364S	5,54%	01/08/2025	20/02/2026	59.288	-
IDSR310726364S	4,65%	27/10/2025	31/07/2026	52.744	-
IDSR020126364S	5,85%	14/07/2025	02/01/2026	49.987	-
IDSR190126367S	5,60%	28/07/2025	19/01/2026	49.892	-
IDSR190126367S	5,57%	29/07/2025	19/01/2026	49.892	-
IDSR060226364S	6,44%	19/05/2025	06/02/2026	49.774	-
IDSR100426364S	5,52%	30/07/2025	10/04/2026	49.359	-
IDSR100426364S	5,35%	14/08/2025	10/04/2026	49.359	-
IDSR040526367S	5,65%	23/07/2025	04/05/2026	49.202	-
IDSR150526364S	4,80%	29/12/2025	15/05/2026	49.127	-
IDSR140826364S	4,66%	24/11/2025	14/08/2026	48.533	-
IDSR030626364S	4,86%	24/12/2025	03/06/2026	47.045	-
IDSR230326367S	4,62%	30/10/2025	23/03/2026	35.761	-
				2.619.058	**-**

9. EFEK-EFEK (lanjutan)

c. Berdasarkan penerbit (lanjutan)

Surat Utang Negara:

9. MARKETABLE SECURITIES (continued)

c. By issuer (continued)

Government Bonds:

Seri/*Series*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Nilai wajar/*Fair value* 31 Desember 2025/ *December 31, 2025*	Nilai wajar/*Fair value* 31 Desember 2024/ *December 31, 2024*
Nilai wajar melalui penghasilan komprehensif lain/ ***Fair value through other comprehensive income:***					
FR0091	6,38%	17/03/2022	15/04/2032	941.638	991.035
FR0087	6,50%	21/03/2022	15/02/2031	103.328	175.122
FR0058	8,25%	16/03/2022	15/06/2032	89.594	85.222
FR0082	7,00%	13/01/2022	15/09/2030	73.749	69.903
FR0091	6,38%	21/03/2022	15/04/2032	71.646	67.352
FR0087	6,50%	22/03/2022	15/02/2031	51.664	48.645
FR0059	7,00%	10/01/2022	15/05/2027	51.304	49.970
FR0091	6,38%	07/01/2022	15/04/2032	51.176	48.109
FR0091	6,38%	23/03/2022	15/04/2032	51.176	48.109
ORI023T	5,90%	03/10/2025	15/07/2026	50.226	-
FR0086	5,50%	04/03/2021	15/04/2026	50.074	49.015
FR0087	6,50%	08/12/2021	15/02/2031	46.498	43.781
FR0082	7,00%	21/03/2022	15/09/2030	42.142	89.876
FR0087	6,50%	24/03/2022	15/02/2031	41.331	38.916
FR0054	9,50%	16/03/2022	15/07/2031	35.169	33.885
FR0082	7,00%	17/01/2022	15/09/2030	31.607	29.959
FR0087	6,50%	16/03/2022	15/02/2031	30.998	126.477
FR0087	6,50%	23/03/2022	15/02/2031	30.998	126.477
FR0086	5,50%	05/01/2022	15/04/2026	30.044	29.409
FR0062	6,38%	14/11/2012	15/04/2042	24.629	23.021
FR0082	7,00%	15/12/2021	15/09/2030	21.071	19.972
FR0082	7,00%	21/01/2022	15/09/2030	21.071	19.972
FR0087	6,50%	23/06/2021	15/02/2031	20.666	19.457
FR0087	6,50%	07/01/2022	15/02/2031	20.666	19.457
FR0087	6,50%	04/06/2021	15/02/2031	20.665	19.458
FR0091	6,38%	16/03/2022	15/04/2032	20.470	67.352
FR0064	6,13%	09/10/2012	15/05/2028	20.409	19.472
FR0086	5,50%	20/12/2021	15/04/2026	20.030	19.606
FR0082	7,00%	23/03/2022	15/09/2030	10.536	59.917
FR0065	6,63%	28/09/2012	15/05/2033	10.314	9.745
FR0045	9,75%	24/05/2007	15/05/2037	77	72
FR0082	7,00%	22/03/2022	15/09/2030	-	49.931
FR0082	7,00%	18/03/2022	15/09/2030	-	39.945
FR0091	6,38%	18/03/2022	15/04/2032	-	38.487
				2.084.966	**2.577.126**

Obligasi Korporasi:
- Obligasi Non Bank

Corporate Bonds:
- *Non Bank Bonds*

Seri/*Series*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Biaya perolehan diamortisasi atau nilai wajar/ *Amortised cost or fair value* 31 Desember 2025/ *December 31, 2025*	Biaya perolehan diamortisasi atau nilai wajar/ *Amortised cost or fair value* 31 Desember 2024/ *December 31, 2024*
Biaya perolehan diamortisasi/ ***Amortised cost:***					
PT Pegadaian	5,25%	13/11/2025	23/11/2026	58.000	-
PT Sarana Multi Infrastruktur (Persero)	6,40%	27/03/2025	07/04/2026	50.000	-
PT Pegadaian	6,10%	03/09/2025	13/09/2026	50.000	-
PT Sarana Multi Infrastruktur (Persero)	5,00%	27/11/2025	07/12/2026	20.000	-
PT Federal International Finance	5,85%	12/09/2025	22/09/2026	15.000	-
PT Adira Dinamika Multi Finance Tbk	5,50%	21/10/2025	31/10/2026	10.000	-
PT Astra Sedaya Finance	5,40%	24/10/2025	04/11/2026	4.000	-
				207.000	**-**

9. EFEK-EFEK (lanjutan)

c. Berdasarkan penerbit (lanjutan)

Obligasi Korporasi: (lanjutan)
- Obligasi Non Bank (lanjutan)

9. MARKETABLE SECURITIES (continued)

c. By issuer (continued)

Corporate Bonds: (continued)
- *Non Bank Bonds (continued)*

Seri/*Series*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Biaya perolehan diamortisasi atau nilai wajar/ *Amortised cost or fair value*	
				31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*
Nilai wajar melalui penghasilan komprehensif lain/*Fair value through other comprehensive income:*					
PT Sarana Multi Infrastruktur (Persero)	6,75%	27/03/2025	27/03/2028	51.495	-
PT Sarana Multigriya Finansial (Persero)	6,85%	22/02/2023	22/02/2028	51.119	49.765
PT Sarana Multigriya Finansial (Persero)	6,00%	06/01/2022	17/11/2026	50.570	49.255
PT Sarana Multi Infrastruktur (Persero)	5,45%	27/11/2025	27/11/2028	50.031	-
PT Waskita Karya (Persero) Tbk	6,10%	24/09/2021	24/09/2026	49.915	49.314
PT Federal International Finance	6,15%	12/09/2025	12/09/2028	22.401	-
PT Bussan Auto Finance	6,50%	08/09/2023	08/09/2026	22.160	21.951
PT Toyota Astra Financial Services	5,60%	11/11/2025	11/11/2028	20.194	-
PT Tower Bersama Infrastructure Tbk	5,50%	04/12/2025	04/12/2028	19.994	-
PT Pegadaian	5,50%	13/11/2025	13/11/2028	14.987	-
PT Pegadaian	6,20%	16/06/2023	16/06/2026	6.025	5.943
PT Oki Pulp & Paper Mills	8,00%	04/11/2025	04/11/2028	2.000	-
PT Toyota Astra Financial Services	5,70%	23/02/2022	23/02/2025	-	39.926
				360.891	**216.154**

- Obligasi Bank

- *Bank Bonds*

Seri/*Series*	Tingkat suku bunga/ *Interest rate*	Tanggal mulai/ *Start date*	Jatuh tempo/ *Maturity date*	Nilai wajar/*Fair value*	
				31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*
Nilai wajar melalui penghasilan komprehensif lain/*Fair value through other comprehensive income:*					
PT Bank Tabungan Negara (Persero) Tbk	5,30%	12/12/2025	12/12/2028	19.998	-
				19.998	**-**

d. Berdasarkan peringkat

d. By rating

	31 Desember 2025/*December 31, 2025*			
	Pemeringkat/ *Agencies*	Peringkat/*Rating*	Biaya perolehan diamortisasi atau nilai wajar/*Amortised cost or fair value*	
Biaya perolehan diamortisasi:				***Amortised cost:***
Sekuritas Rupiah Bank Indonesia (SRBI)			2.274.763	*Bank Indonesia Rupiah Securities (SRBI)*
Obligasi Korporasi:				*Corporate Bonds:*
PT Pegadaian	*Pefindo*	AAA	108.000	*PT Pegadaian*
PT Sarana Multi Infrastruktur (Persero)	*Pefindo*	AAA	70.000	*PT Sarana Multi Infrastruktur (Persero)*
PT Federal International Finance	*Pefindo*	AAA	15.000	*PT Federal International Finance*
PT Adira Dinamika Multi Finance Tbk	*Pefindo*	AAA	10.000	*PT Adira Dinamika Multi Finance Tbk*
PT Astra Sedaya Finance	*Pefindo*	AAA	4.000	*PT Astra Sedaya Finance*
			2.481.763	

9. EFEK-EFEK (lanjutan) / *9. MARKETABLE SECURITIES (continued)*

d. Berdasarkan peringkat (lanjutan) / *d. By rating (continued)*

	31 Desember 2025/*December 31, 2025*			
	Pemeringkat/ *Agencies*	**Peringkat/*Rating***	**Biaya perolehan diamortisasi atau nilai wajar/*Amortised cost or fair value***	
Nilai wajar melalui penghasilan komprehensif lain:				***Fair value through other comprehensive income:***
Surat Utang Negara (SUN)			2.084.966	*Government Bond (SUN)*
Sekuritas Rupiah Bank Indonesia (SRBI)			2.619.058	*Bank Indonesia Rupiah Securities (SRBI)*
Obligasi Korporasi:				*Corporate Bonds:*
PT Sarana Multigriya Finansial (Persero)	*Pefindo*	AAA	101.689	*PT Sarana Multigriya Finansial (Persero)*
PT Sarana Multi Infrastruktur (Persero)	*Pefindo*	AAA	101.526	*PT Sarana Multi Infrastruktur (Persero)*
PT Waskita Karya (Persero) Tbk	*Pefindo*	AAA	49.915	*PT Waskita Karya (Persero) Tbk*
PT Federal International Finance	*Pefindo*	AAA	22.401	*PT Federal International Finance*
PT Bussan Auto Finance	*Fitch Rating*	AAA	22.160	*PT Bussan Auto Finance*
PT Pegadaian	*Pefindo*	AAA	21.012	*PT Pegadaian*
PT Toyota Astra Financial Services	*Fitch Rating*	AAA	20.194	*PT Toyota Astra Financial Services*
PT Bank Tabungan Negara (Persero) Tbk	*Pefindo*	AAA	19.998	*PT Bank Tabungan Negara (Persero) Tbk*
PT Tower Bersama Infrastructure Tbk	*Fitch Rating*	AA+	19.994	*PT Tower Bersama Infrastructure Tbk*
PT Oki Pulp & Paper Mills	*Pefindo*	A+	2.000	*PT Oki Pulp & Paper Mills*
			5.084.913	
Jumlah			**7.566.676**	***Total***

	31 Desember 2024/*December 31, 2024*			
	Pemeringkat/ *Agencies*	**Peringkat/*Rating***	**Biaya perolehan diamortisasi atau nilai wajar/*Amortised cost or fair value***	
Biaya perolehan diamortisasi:				***Amortised cost:***
Sekuritas Rupiah Bank Indonesia (SRBI)	-	-	1.888.672	*Bank Indonesia Rupiah Securities (SRBI)*
			1.888.672	
Nilai wajar melalui penghasilan komprehensif lain:				***Fair value through other comprehensive income:***
Surat Utang Negara (SUN)	-	-	2.577.126	*Government Bond (SUN)*
Obligasi Korporasi:				*Corporate Bonds:*
PT Sarana Multigriya Finansial (Persero)	*Pefindo*	AAA	99.020	*PT Sarana Multigriya Finansial (Persero)*
PT Waskita Karya (Persero) Tbk	*Pefindo*	AAA	49.314	*PT Waskita Karya (Persero) Tbk*
PT Toyota Astra Financial Services	*Fitch Rating*	AAA	39.926	*PT Toyota Astra Financial Services*
PT Bussan Auto Finance	*Fitch Rating*	AAA	21.952	*PT Bussan Auto Finance*
PT Pegadaian	*Pefindo*	AAA	5.942	*PT Pegadaian*
			2.793.280	
Jumlah			**4.681.952**	***Total***

e. Berdasarkan kolektibilitas Bank Indonesia / *e. By Bank Indonesia collectibility*

Pada tanggal 31 Desember 2025 dan 2024, kolektabilitas efek-efek sesuai dengan peraturan OJK diungkapkan pada Catatan 44.

As of December 31, 2025 and 2024, collectability of marketable securities in accordance with OJK regulation are disclosed in Note 44.

9. EFEK-EFEK (lanjutan) / *9. MARKETABLE SECURITIES (continued)*

f. Berdasarkan jangka waktu dan tingkat bunga / *f. By maturity and interest rate*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 tahun	4.944.047	1.888.672	*Less than 1 year*
1-5 tahun	739.341	364.153	*1-5 years*
5-10 tahun	1.827.860	2.376.816	*5-10 years*
Lebih dari 10 tahun	55.428	52.311	*More than 10 years*
Jumlah	**7.566.676**	**4.681.952**	***Total***

Kisaran suku bunga efektif per tahun untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The range of annual effective interest rate for the years ended December 31, 2025 and 2024 were as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah	4,58%-9,75%	5,50%-9,75%	*Rupiah*

g. Cadangan kerugian penurunan nilai / *g. Allowance for impairment losses*

	31 Desember 2025/*December 31, 2025*				
	Stage 1	***Stage 2***	***Stage 3***	**Jumlah/*Total***	
Biaya perolehan diamortisasi:					***Amortised cost:***
Saldo awal	-	-	-	-	*Beginning balance*
Pembentukan selama tahun berjalan	2	-	-	2	*Addition during the year*
Saldo akhir	**2**	**-**	**-**	**2**	***Ending balance***
Nilai wajar melalui penghasilan komprehensif lain:					***Fair value through other comprehensive income:***
Saldo awal	-	-	-	-	*Beginning balance*
Pembentukan selama tahun berjalan	6	-	-	6	*Addition during the year*
Saldo akhir	**6**	**-**	**-**	**6**	***Ending balance***

Pada efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain, cadangan kerugian penurunan nilai dicatat pada penghasilan komprehensif lain sebesar Rp6 pada tanggal 31 Desember 2025.

For marketable securities measured as fair value through other comprehensive income, allowance for impairment losses recorded in other comprehensive income by Rp6 as of December 31, 2025.

Pada 31 Desember 2025, pembentukan beban cadangan kerugian penurunan nilai atas efek-efek adalah Rp8 (Catatan 29).

As of December 31, 2025, additional allowance for impairment losses for marketable securities is Rp8 (Note 29).

9. EFEK-EFEK (lanjutan)

g. Cadangan kerugian penurunan nilai (lanjutan)

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai pada tanggal 31 Desember 2025 telah memadai.

Pada tanggal 31 Desember 2024, tidak terdapat saldo cadangan kerugian penurunan nilai atas efek-efek.

Manajemen berpendapat bahwa tidak terdapat penurunan nilai atas efek-efek, sehingga tidak diperlukan cadangan kerugian penurunan nilai pada tanggal 31 Desember 2024.

9. MARKETABLE SECURITIES (continued)

g. Allowance for impairment losses (continued)

Management believes that allowance for impairment losses as of December 31, 2025 are adequate.

As of December 31, 2024, there were no balances of allowance for impairment losses on marketable securities.

Management believes that there is no impairment of losses for marketable securities, as such no allowance for impairment losses was required as of December 31, 2024.

10. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI

Efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2025 dan 2024 terdiri dari:

10. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL

Securities purchased under agreements to resell as of December 31, 2025 and 2024 is as follows:

				31 Desember 2025/*December 31, 2025*			
Pihak lawan/ ***Counterparties***	**Tanggal mulai/** ***Start date***	**Tanggal jatuh tempo/** ***Maturity date***	**Nilai pembelian/** ***Proceed value***	**Nilai nominal/** ***Nominal amount***	**Nilai jual kembali/** ***Resale value***	**Pendapatan bunga yang belum diamortisasi/** ***Unamortised interest***	**Nilai tercatat/** ***Carrying value***
VR0070	31/12/2025	07/01/2026	362.399	370.289	362.734	(287)	362.447
VR0092	29/10/2025	28/01/2026	190.527	200.000	192.790	(672)	192.118
VR0057	08/10/2025	07/01/2026	95.774	100.000	96.917	(75)	96.842
Jumlah/*Total*				**670.289**	**652.441**	**(1.034)**	**651.407**

				31 Desember 2024/*December 31, 2024*			
Pihak lawan/ ***Counterparties***	**Tanggal mulai/** ***Start date***	**Tanggal jatuh tempo/** ***Maturity date***	**Nilai pembelian/** ***Proceed value***	**Nilai nominal/** ***Nominal amount***	**Nilai jual kembali/** ***Resale value***	**Pendapatan bunga yang belum diamortisasi/** ***Unamortised interest***	**Nilai tercatat/** ***Carrying value***
VR0034	27/12/2024	03/01/2025	913.974	925.000	915.041	(305)	914.736
VR0042	30/12/2024	06/01/2025	666.660	680.000	667.438	(556)	666.882
VR0034	31/12/2024	07/01/2025	296.663	300.000	297.010	(297)	296.713
Jumlah/*Total*				**1.905.000**	**1.879.489**	**(1.158)**	**1.878.331**

Seluruh efek-efek yang dibeli dengan janji dijual kembali pada tanggal 31 Desember 2025 dan 2024 digolongkan sebagai *Stage 1* dan berlokasi di Indonesia.

All securities purchased under agreements to resell as of December 31, 2025 and 2024 classified as Stage 1 and located in Indonesia.

10. EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI (lanjutan)

Manajemen berpendapat bahwa seluruh efek-efek yang dibeli dengan janji dijual kembali dapat ditagih dan penyisihan kerugian penurunan nilai tidak diperlukan.

Pada tanggal 31 Desember 2025 dan 2024, kolektibilitas efek-efek yang dibeli dengan janji dijual kembali seseuai dengan peraturan OJK diungkapkan pada Catatan 44.

Tingkat suku bunga rata-rata per tahun untuk tahun:

10. SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL (continued)

Management believes that securities purchased under agreements to resell are fully collectible and allowance for impairment losses is not required.

As of December 31, 2025 and 2024, collectibility of securities purchase under agreements to resell in accordance with OJK regulation are disclosed in Note 44.

Annual average interest rates for the year:

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Rupiah	4,72%	6,00%	*Rupiah*

11. KREDIT YANG DIBERIKAN

Kredit yang diberikan yang diklasifikasikan berdasarkan *stage*, hubungan dan kolektibilitas terdiri dari:

1. Berdasarkan *stage*

Berikut adalah perubahan jumlah kredit yang diberikan berdasarkan *stage* berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024:

11. LOANS

Loans classified based on the stage, relationship and collectibility consists of the following:

1. By stage

Below is movement of loans based on stages for the year ended and the years ended December 31, 2025 and 2024:

	31 Desember 2025/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Saldo awal	8.057.758	444.506	319.882	8.822.146	*Beginning balance*
Transfer ke kerugian kredit ekspektasian 12 bulan (*stage* 1)	150	(45)	(105)	-	*Transfer to 12-month expected credit losses (stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 2)	(343.425)	343.425	-	-	*Transfer to lifetime expected credit losses (stage 2)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 3)	(6.002)	(72)	6.074	-	*Transfer to lifetime expected credit losses (stage 3)*
Pengukuran kembali nilai tercatat bersih	(522.908)	(3.276)	1.634.425	1.108.241	*Remeasurement of net carrying amount*
Aset keuangan yang baru Diterbitkan	6.477.706	-	-	6.477.706	*Newly issued financial asset*
Dihentikan pengakuannya	(7.081.479)	(440.845)	(288.696)	(7.811.020)	*Derecognition*
Penghapusbukuan selama tahun berjalan	-	-	(1.414.493)	(1.414.493)	*Write-off during the year*
Saldo akhir	**6.581.800**	**343.693**	**257.087**	**7.182.580**	***Ending balance***

11. KREDIT YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

Kredit yang diberikan yang diklasifikasikan berdasarkan *stage*, hubungan dan kolektibilitas terdiri dari: (lanjutan)

Loans classified based on the stage, relationship and collectibility consists of the following: (continued)

1. Berdasarkan stage (lanjutan) / *1. By stage (continued)*

	31 Desember 2024/*December 31, 2024*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Saldo awal	9.840.442	570.574	372.325	10.783.341	*Beginning balance*
Transfer ke kerugian kredit ekspektasian 12 bulan (*stage* 1)	322	(158)	(164)	-	*Transfer to 12-month expected credit losses (stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 2)	(447.032)	447.065	(33)	-	*Transfer to lifetime expected credit losses (stage 2)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 3)	(46.559)	(2.117)	48.676	-	*Transfer to lifetime expected credit losses (stage 3)*
Pengukuran kembali nilai tercatat bersih	(653.793)	(16.377)	2.394.564	1.724.394	*Remeasurement of net carrying amount*
Aset keuangan yang baru diterbitkan	7.685.454	-	-	7.685.454	*Newly issued financial asset*
Dihentikan pengakuannya	(8.321.076)	(554.481)	(267.186)	(9.142.743)	*Derecognition*
Penghapusbukuan selama tahun berjalan	-	-	(2.228.300)	(2.228.300)	*Write-off during the year*
Saldo akhir	**8.057.758**	**444.506**	**319.882**	**8.822.146**	***Ending balance***

2. Berdasarkan hubungan / *2. By relationship*

Terdapat penyaluran kredit kepada pihak berelasi dan pihak ketiga yakni:

Loans to related parties and third parties were as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pihak berelasi (Catatan 36)	22.030	22.624	*Related parties (Note 36)*
Pihak ketiga	7.160.550	8.799.522	*Third parties*
	7.182.580	8.822.146	
Cadangan kerugian penurunan nilai	(515.056)	(635.245)	*Allowance for impairment losses*
Jumlah	**6.667.524**	**8.186.901**	***Total***

3. Berdasarkan kolektibilitas Bank Indonesia dan penyisihan penilaian kualitas aset sesuai ketentuan POJK / *3. By Bank Indonesia collectibility and asset quality allowances based on POJK*

Kolektibilitas Bank Indonesia dan penyisihan penilaian kualitas aset sesuai ketentuan POJK (setelah dikurangi nilai agunan yang dapat diperhitungkan), masing-masing untuk tanggal 31 Desember 2025 dan 2024 diungkapkan pada Catatan 44.

The collectibility and assets quality allowances as per POJK (after deducted with allowable collateral value) as of December 31, 2025, and 2024, respectively are disclosed in Note 44.

11. KREDIT YANG DIBERIKAN (lanjutan) / *11. LOANS (continued)*

4. Berdasarkan jangka waktu perjanjian kredit / *4. By loan agreements period*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari 1 tahun	6.311.155	7.292.072	*Less than 1 year*
1 sampai dengan 5 tahun	609.379	1.049.837	*1 up to 5 years*
5 sampai dengan 10 tahun	84.472	178.229	*5 up to 10 years*
Lebih dari 10 tahun	177.574	302.008	*More than 10 years*
Jumlah	**7.182.580**	**8.822.146**	***Total***

5. Tingkat suku bunga rata-rata per tahun / *5. Annual average interest rates*

Tingkat suku bunga rata-rata per tahun untuk tahun:

The annual average interest rates for year:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kredit rekening koran	8,21%	8,31%	*Demand loan*
Kredit modal kerja, kredit investasi dan kredit konsumer	62,52%	69,18%	*Working capital loan, investment loan and consumer loan*
Kredit karyawan	5,96%	5,90%	*Employees loan*

6. Kredit yang direstrukturisasi / *6. Restructured loans*

Kredit yang direstrukturisasi sesuai dengan peraturan OJK diungkapkan pada Catatan 44.

Restructured loans in accordance with the OJK regulation are disclosed in Note 44.

7. Cadangan kerugian penurunan nilai / *7. Allowances for impairment losses*

Perubahan cadangan kerugian penurunan nilai adalah sebagai berikut:

The movements in the allowance for impairment losses were as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Saldo awal	635.245	625.422	*Beginning balance*
Pembentukan selama tahun berjalan (Catatan 29)	1.294.304	2.238.123	*Addition during the the year (Note 29)*
Penghapusan selama tahun berjalan	(1.414.493)	(2.228.300)	*Write-off during the year*
Saldo akhir	**515.056**	**635.245**	***Ending balance***

11. KREDIT YANG DIBERIKAN (lanjutan)

11. LOANS (continued)

7. Cadangan kerugian penurunan nilai (lanjutan)

7. Allowances for impairment losses (continued)

Perubahan cadangan kerugian penurunan nilai berdasarkan *stage* adalah sebagai berikut: (lanjutan)

The movements in the allowance for impairment losses by stage were as follows: (continued)

	31 Desember 2025/*December 31, 2025*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Saldo awal	203.031	144.606	287.608	635.245	*Beginning balance*
Transfer ke kerugian kredit ekspektasian 12 bulan (*stage* 1)	789	(87)	(702)	-	*Transfer to 12-month expected credit losses (stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 2)	(440)	440	-	-	*Transfer to lifetime expected credit losses (stage 2)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 3)	(2.722)	(232)	2.954	-	*Transfer to lifetime expected credit -losses (stage 3)*
Pembentukan selama tahun berjalan (Catatan 29)	4.315	(28.101)	1.318.090	1.294.304	*Additional during the year (Note 29)*
Penghapusbukuan selama tahun berjalan	-	-	(1.414.493)	(1.414.493)	*Write-off during the year*
Saldo akhir	**204.973**	**116.626**	**193.457**	**515.056**	***Ending balance***

	31 Desember 2024/*December 31, 2024*				
	***Stage* 1**	***Stage* 2**	***Stage* 3**	**Jumlah/*Total***	
Saldo awal	276.481	52.014	296.927	625.422	*Beginning balance*
Transfer ke kerugian kredit ekspektasian 12 bulan (*stage* 1)	527	(102)	(425)	-	*Transfer to 12-month expected credit losses (stage 1)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 2)	(1.475)	1.502	(27)	-	*Transfer to lifetime expected credit losses (stage 2)*
Transfer ke kerugian kredit ekspektasian sepanjang umurnya (*stage* 3)	(94.415)	(8.822)	103.237		*Transfer to lifetime expected credit -losses (stage 3)*
Pembentukan selama tahun berjalan (Catatan 29)	21.913	100.014	2.116.196	2.238.123	*Additional during the year (Note 29)*
Penghapusbukuan selama tahun berjalan	-	-	(2.228.300)	(2.228.300)	*Write-off during the year*
Saldo akhir	**203.031**	**144.606**	**287.608**	**635.245**	***Ending balance***

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai pada tanggal 31 Desember 2025 dan 2024 telah memadai.

Management believes that the allowance for impairment losses as of December 31, 2025 and 2024 are adequate.

8. Kredit bermasalah

8. Non performing loans

Sesuai dengan peraturan OJK, kredit bermasalah berdasarkan sektor ekonomi diungkapkan pada Catatan 44.

In accordance with the OJK regulation, non-performing loans based on economic sector are disclosed in Note 44.

11. KREDIT YANG DIBERIKAN (lanjutan)

9. Informasi pokok lainnya sehubungan dengan kredit yang diberikan

a. Jenis agunan yang diterima oleh Bank untuk menjamin fasilitas kredit yang diberikan antara lain berupa sertifikat tanah, deposito, giro, Bukti Pemilikan Kendaraan Bermotor (BPKB), dan jaminan lainnya yang diterima oleh perbankan.

b. Kredit modal kerja dan kredit investasi diberikan untuk kepentingan modal kerja dan barang-barang modal lainnya, sedangkan kredit konsumer diberikan untuk tujuan pemilikan rumah, kendaraan bermotor, dan kredit perorangan lainnya.

c. Kredit yang diberikan kepada Direksi, Dewan Komisaris, dan Karyawan Bank merupakan kredit konsumtif. Kredit tersebut dibebani bunga dengan jangka waktu antara 1 tahun sampai 5 tahun. Sumber pembayaran kredit tersebut berasal dari pemotongan gaji setiap bulan. Kredit yang diberikan kepada pihak yang berelasi, dilakukan dengan persyaratan dan proses analisis normal seperti kepada pihak lain.

d. Bank telah mengasuransikan kredit yang diberikan untuk menutup kemungkinan kerugian terhadap risiko kredit kepada PT Asuransi Kredit Indonesia (Persero), PT Asuransi Jasa Indonesia (Persero), AJB Bumiputera 1912, PT Fokus Solusi Proteksi (Cermati), PT Asuransi Intra Asia, PT Marsh Indonesia, PT Asuransi Simas Insurtech dan PT Asuransi Staco Mandiri, seluruhnya merupakan pihak ketiga, dengan jumlah nilai pertanggungan sebesar Rp31.153 dan Rp3.110.945 masing-masing pada tanggal 31 Desember 2025 dan 2024. Asuransi kredit digital dengan jenis layanan administratif memiliki batas maksimal jumlah klaim sampai dengan 98% dari jumlah premi yang dibayarkan.

e. Kredit sindikasi merupakan kredit yang diberikan kepada debitur berdasarkan perjanjian pembiayaan bersama dengan bank lain.

Jumlah kredit sindikasi antara Bank dengan bank lain pada tanggal 31 Desember 2025 and 2024 adalah sebesar Rp224.578 dan Rp193.972. Partisipasi Bank dalam kredit sindikasi tersebut pada tanggal 31 Desember 2025 and 2024 sebesar 11,54% dan 6% - 11,54% dari total kredit sindikasi.

11. LOANS (continued)

9. Other significant information relating to loans

a. Type of collaterals accepted by the Bank to secure loans includes land certificate, time deposits, current account, certificates of ownership of motor vehicles, and other guarantees accepted by banks.

b. Working capital loans and investment loans are given to borrowers that need financing of working capital and other capital goods, while consumer loans are given for purposes such as housing, motor vehicles, and other personal loans.

c. Loans granted to the Board of Directors, Board of Commissioners and Bank Employees are classified as consumer loan. The loan bears interest with a term of 1 year to 5 years. Sources of loan repayment are derived from monthly salary deduction. Loans granted to related parties to the Bank is made within the requirements and normal process analysis as to other parties.

d. The Bank has insured its loans to cover possible losses against credit risks to PT Asuransi Kredit Indonesia (Persero), PT Asuransi Jasa Indonesia (Persero), AJB Bumiputera 1912, PT Fokus Solusi Proteksi (Cermati), PT Asuransi Intra Asia, PT Marsh Indonesia, PT Asuransi Simas Insurtech and PT Asuransi Staco Mandiri, all are third parties, with a total coverage of Rp31,153 and Rp3,110,945 as of December 31, 2025 and 2024. Digital loan insurance with administrative service type have a maximum claim limit up to 98% of the total premium paid.

e. Syndicated loans represent loans provided to debtor under syndication agreements with other banks.

The amount of syndicated loans between the Bank and other banks as of December 31, 2025 and 2024 amounting to Rp224,578 and Rp193,972. The Bank's participation in syndicated loans as of December 31, 2025 and 2024 is 11.54% and between 6% - 11.54% from total syndicated loans.

11. KREDIT YANG DIBERIKAN (lanjutan)

9. Informasi pokok lainnya sehubungan dengan kredit yang diberikan (lanjutan)

Sesuai dengan peraturan OJK, ketentuan Batas Maksimum Pemberian Kredit (BMPK) baik untuk pihak berelasi maupun untuk pihak ketiga dan Rasio kredit yang diberikan kepada Usaha Mikro Kecil dan Menengah (UMKM) terhadap jumlah kredit yang diberikan diungkapkan pada Catatan 44.

11. LOANS (continued)

9. Other significant information relating to loans (continued)

In accordance with the OJK regulation, Legal Lending Limit (LLL) requirements for both related parties and third parties and Ratios of loans extended to Micro, Small, Medium Enterprise (UMKM) to total loans are disclosed in Note 44.

12. ASET TETAP DAN ASET HAK GUNA

12. 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***	
Aset tetap kepemilikan langsung	213.573	212.416	*Direct ownership fixed assets*
Aset hak guna	58.710	95.952	*Right of use assets*
Jumlah	**272.283**	**308.368**	***Total***

Aset tetap kepemilikan langsung: ***Direct ownership fixed assets:***

	31 Desember 2025/*December 31, 2025*						
	Saldo awal/ ***Beginning***	**Penambahan/** ***Additions***	**Pengurangan/** ***Deductions***	**Reklasifikasi/** ***Reclassification***	**Revaluasi/** ***Revaluation***	**Saldo akhir/** ***Ending balance***	
Nilai perolehan							***Cost***
Tanah	71.093	-	-	-	-	71.093	*Land*
Bangunan	12.210	380	-	-	-	12.590	*Buildings*
Peralatan dan perabotan kantor	15.296	1.082	(2.102)	11	-	14.287	*Office furnitures and fixtures*
Instalasi	1.610	-	(1.610)	-	-	-	*Installations*
Komputer	166.026	5.510	(2.410)	6.375	-	175.501	*Computers*
Kendaraan	4.743	2.152	(1.084)	-	-	5.811	*Vehicles*
Aset dalam Pembangunan	-	12.733	(167)	(6.386)	-	6.180	*Assets in progress*
Jumlah	**270.978**	**21.857**	**(7.373)**	**-**	**-**	**285.462**	***Total***
Akumulasi penyusutan							***Accummulated depreciation***
Bangunan	-	874	-	-	-	874	*Buildings*
Peralatan dan perabotan kantor	12.696	1.084	(2.026)	-	-	11.754	*Office furnitures and fixtures*
Instalasi	1.608	-	(1.608)	-	-	-	*Installations*
Komputer	41.450	14.995	(2.381)	-	-	54.064	*Computers*
Kendaraan	2.808	3.224	(835)	-	-	5.197	*Vehicles*
Jumlah	**58.562**	**20.177**	**(6.850)**	**-**	**-**	**71.889**	***Total***
Nilai buku	**212.416**					**213.573**	***Book value***

12. ASET TETAP DAN ASET HAK GUNA (lanjutan)

12. FIXED ASSETS AND RIGHT OF USE ASSETS (continued)

Aset tetap kepemilikan langsung (lanjutan):

Direct ownership fixed assets (continued):

	31 Desember 2024/ *December 31, 2024*						
	Saldo awal/ *Beginning*	**Penambahan/ *Additions***	**Pengurangan/ *Deductions***	**Reklasifikasi/ *Reclassification***	**Revaluasi/ *Revaluation***	**Saldo akhir/ *Ending balance***	
Nilai perolehan							***Cost***
Tanah	107.337	-	-	(38.153)*)	1.909	71.093	*Land*
Bangunan	19.977	-	-	(1.326)**)	(6.441)	12.210	*Buildings*
Peralatan dan perabotan kantor	17.172	777	(3.254)	601	-	15.296	*Office furnitures and fixtures*
Instalasi	1.669	-	(59)	-	-	1.610	*Installations*
Komputer	152.939	4.247	(7.170)	16.010	-	166.026	*Computers*
Kendaraan	5.518	-	(775)	-	-	4.743	*Vehicles*
Aset dalam Pembangunan	1.528	16.010	(71)	(17.467)	-	-	*Assets in progress*
Jumlah	**306.140**	**21.034**	**(11.329)**	**(40.335)**	**(4.532)**	**270.978**	***Total***
Akumulasi penyusutan							***Accummulated depreciation***
Bangunan	1.671	1.307	-	-	(2.978)	-	*Buildings*
Peralatan dan perabotan kantor	14.049	1.716	(3.069)	-	-	12.696	*Office furnitures and fixtures*
Instalasi	1.661	6	(59)	-	-	1.608	*Installations*
Komputer	34.571	13.973	(7.094)	-	-	41.450	*Computers*
Kendaraan	2.844	482	(518)	-	-	2.808	*Vehicles*
Jumlah	**54.796**	**17.484**	**(10.740)**	**-**	**(2.978)**	**58.562**	***Total***
Nilai buku	**251.344**					**212.416**	***Book value***

*) Aset tetap atas tanah sebesar Rp38.153 direklasifikasi ke aset terbengkalai efektif tanggal 20 Desember 2024 (Catatan 14).
**) Aset tetap atas bangunan terdiri dari penambahan dari reklasifikasi aset dalam pembangunan sebesar Rp856 dan pengurangan direklasifikasi ke aset terbengkalai sebesar Rp2.182 efektif tanggal 20 Desember 2024 (Catatan 14).

**) Fixed assets for land amounting to Rp38,153 were reclassified to abandoned assets effective December 20, 2024 (Note 14).*
***) Fixed assets for buildings consist of additions from the reclassification of assets in progress amounting to Rp856 and reductions reclassified to abandoned assets amounting to Rp2,182 effective December 20, 2024 (Note 14)*

Manajemen berpendapat bahwa tidak terdapat indikasi terjadinya penurunan nilai aset tetap.

Management believes that there is no indication of impairment for fixed assets.

Aset tetap dalam pembangunan pada tanggal 31 Desember 2025 diperkirakan akan diselesaikan masing-masing pada kuartal pertama sampai dengan kuartal kedua tahun 2026, dengan kisaran persentase penyelesaian sebesar 30%-90%.

Fixed asset under construction as of December 31, 2025, are expected to be completed in the first quarter through the second quarter of 2026, with a percentage of completion ranging from 30%-90%.

Aset tetap dalam pembangunan pada tanggal 31 Desember 2024 telah diselesaikan seluruhnya dan dicatat sebagai bangunan.

Fixed asset under construction as of December 31, 2024, were fully completed and recorded as buildings.

Jumlah penyusutan aset tetap kepemilikan langsung yang dibebankan pada laporan laba rugi dan penghasilan komprehensif lain masing-masing sebesar Rp20.177 dan Rp17.484 untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 (Catatan 30).

The amount of depreciation of direct ownership fixed assets is charged to the statement of profit or loss and other comprehensive income which is amounting to Rp20,177 and Rp17,484, for the years ended December 31, 2025 and 2024, respectively (Note 30).

12. ASET TETAP DAN ASET HAK GUNA (lanjutan)

12. FIXED ASSETS AND RIGHT OF USE ASSETS (continued)

Aset tetap kepemilikan langsung (lanjutan):

Direct ownership fixed assets (continued):

Pada tanggal 31 Desember 2025 dan 2024, terdapat keuntungan penjualan aset tetap dengan rincian sebagai berikut:

As of December 31, 2025 and 2024, there was a gain on sale of fixed assets with the following details:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Hasil penjualan	806	1.550	*Proceeds*
Nilai buku	(167)	(1.188)	*Book value*
Keuntungan penjualan aset tetap (Catatan 33)	**639**	**362**	***Gain on sale of fixed assets (Note 33)***

Pada tanggal 31 Desember 2025 dan 2024, terdapat kerugian penjualan aset tetap dengan rincian sebagai berikut:

As of December 31, 2025 and 2024, there was a loss on sale of fixed assets with the following details:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Hasil penjualan	14	20	*Proceeds*
Nilai buku	(78)	(241)	*Book value*
Kerugian penjualan aset tetap (Catatan 34)	**(64)**	**(221)**	***Loss on sale of fixed assets (Note 34)***

Pada tanggal 31 Desember 2025 dan 2024, Bank menghapus beberapa aset tetap dengan nilai buku neto masing-masing sebesar Rp111 dan Rp18.

As of December 31, 2025 and 2024, Bank write-off some of fixed assets with net book value amounted to Rp111 dan Rp18, respectively.

Bank telah mengasuransikan aset tetap (tidak termasuk hak atas tanah) untuk menutup kemungkinan kerugian terhadap risiko kebakaran dan pencurian kepada PT Zurich Asuransi Indonesia, PT Sompo Insurance Indonesia, PT Asuransi Jasindo Oto, dan PT Asuransi Staco Mandiri, yang seluruhnya merupakan pihak ketiga, dengan jumlah nilai pertanggungan sebesar Rp75.239 dan Rp75.725 masing-masing pada tanggal 31 Desember 2025 dan 2024. Manajemen berpendapat bahwa pertanggungan asuransi untuk aset tetap yang dimiliki Bank telah memadai.

The Bank has insured its fixed assets (excluding land rights) to cover possible losses against fire and theft risks to PT Zurich Asuransi Indonesia, PT Sompo Insurance Indonesia, PT Asuransi Jasindo Oto, and PT Asuransi Staco Mandiri, which all are third parties with a total coverage of Rp75,239 and Rp75,725 as of December 31, 2025 and 2024, respectively. Management believes that the insurance coverage for the Bank's fixed assets is adequate.

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat aset tetap yang dijaminkan.

On December 31, 2025 and 2024, there are no fixed assets which are pledged as collateral.

12. ASET TETAP DAN ASET HAK GUNA (lanjutan)

12. FIXED ASSETS AND RIGHT OF USE ASSETS (continued)

Aset tetap kepemilikan langsung (lanjutan):

Direct ownership fixed assets (continued):

Pada 31 Desember 2025 dan 2024 terdapat aset yang telah disusutkan penuh namun masih digunakan yang terdiri dari:

As of December 31, 2025 and 2024, there are assets that have been fully depreciated but still in use which consist of:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Komputer	13.463	10.593	*Computers*
Peralatan dan perabotan kantor	9.333	10.173	*Office furnitures and fixtures*
Instalasi	-	1.638	*Installation*
Kendaraan	1.750	626	*Vehicles*
Jumlah	**24.546**	**23.030**	***Total***

Pada tanggal 30 November 2015, Bank melakukan perubahan kebijakan akuntansi atas tanah dan bangunan dari sebelumnya menggunakan model biaya menjadi model revaluasi.

On November 30, 2015, the Bank changed its accounting policy for land and buildings from cost model to revaluation model.

Pada tanggal 20 Desember 2024, Bank kembali melakukan revaluasi dan menugaskan kantor jasa penilai independen eksternal untuk melaksanakan proses penilaian kembali aset tetap (tanah dan bangunan) per tanggal 31 Desember 2023. Penilaian kembali atas tanah dan bangunan tersebut bukan untuk tujuan perpajakan.

On December 20, 2024, the Bank re-evaluates and assigned registered external independent appraisers to conduct revaluation of fixed assets (land and buildings) as of December 31, 2023. Revaluation of land and buildings are not for tax purpose.

Penilaian atas tanah dan bangunan dilakukan oleh penilai independen eksternal yang telah terdaftar di OJK yaitu oleh Kantor Jasa Penilai Publik Budi, Edy, Saptono & Rekan yang ditandatangani oleh Jeffry I. Benyamin, ST, SE, MAPPI (Cert.).

The appraisal of land and buildings is conducted by registered external independent appraiser in OJK which is Public Appraiser of Budi, Edy, Saptono & Partners, signed by Jeffry I. Benyamin, ST, SE, MAPPI (Cert.).

Penilaian dilakukan berdasarkan Standar Penilaian Indonesia, ditentukan berdasarkan transaksi pasar terkini dan dilakukan dengan ketentuan-ketentuan yang lazim. Metode penilaian yang dipakai adalah metode data pasar, metode biaya dan metode pendapatan. Elemen-elemen yang digunakan dalam perbandingan data untuk menentukan nilai wajar aset antara lain:

Valuations were performed based on Indonesian Valuation Standards with reference to recent market transactions with arm's length terms. The valuation method used are market data approach, cost approach and income approach. The elements used in data comparison to determine fair value of assets are among others, as follows:

a) Jenis dan hak yang melekat pada properti
b) Kondisi pasar
c) Lokasi
d) Karakteristik fisik
e) Karakteristik dalam menghasilkan pendapatan
f) Karakteristik tanah

a) Type and right on property
b) Market condition
c) Location
d) Physical characteristic
e) Income producing characteristic
f) Land characteristic

12. ASET TETAP DAN ASET HAK GUNA (lanjutan)

12. FIXED ASSETS AND RIGHT OF USE ASSETS (continued)

Aset tetap kepemilikan langsung (lanjutan):

Direct ownership fixed assets (continued):

Hasil dari penilaian kembali tanah dan bangunan adalah sebagai berikut:

Results from the revaluation of land and buildings are as follows:

	31 Desember 2024/*December 31, 2024*					
			Penghasilan komprehensif lain			
	Nilai buku sebelum revaluasi/ *Carrying amount before revaluation*	**Nilai pasar setelah revaluasi/ *Market value after revaluation***	**Surplus revaluasi/ *Revaluation surplus***	**Rugi revaluasi absorb saldo laba surplus/ *Revaluation loss absorbs surplus balance***	**Rugi revaluasi/ *Revaluation surplus***	
Tanah	107.337	109.246	2.265	(356)	-	*Land*
Bangunan	17.856	14.392	488	(1.286)	(2.666)	*Buildings*
Jumlah	**125.193**	**123.638**	**2.753**	**(1.642)**	**(2.666)**	***Total***

Kenaikan nilai tercatat yang timbul dari revaluasi aset tetap dicatat sebagai "Surplus Revaluasi" di "Pendapatan Komprehensif Lain".

Increase in the carrying amount arising from revaluation of fixed assets is recorded in "Revaluation Surplus" in "Other Comprehensive Income".

Penurunan nilai tercatat yang timbul dari revaluasi aset tetap dicatat sebagai "Rugi Revaluasi Aset Tetap" di "Beban Non-Operasional". Tidak terdapat penurunan nilai tercatat yang timbul dari revaluasi aset tetap untuk tahun yang berakhir pada tanggal 31 Desember 2025.

Decrease in the carrying amount arising from revaluation of fixed assets is recorded in "Loss on Revaluation of Fixed Assets" in "Non-Operating Expenses". There were no decrease in the carrying amount arising from revaluation of fixed assets for the year then ended December 31, 2025.

Nilai wajar hak atas tanah dan bangunan pada hirarki nilai wajar *level* 3.

The fair value measurement for the land is categorized as level 3 fair value.

Jika tanah dan bangunan dicatat sebesar harga perolehan, maka dicatat dengan jumlah sebagai berikut:

If land and buildings are recorded using the cost model, the amount would be as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Tanah	13.532	13.532	*Land*
Bangunan:			*Buildings:*
Harga perolehan	9.532	9.532	*Acquisition cost*
Akumulasi penyusutan	(7.464)	(7.332)	*Accumulated depreciation*
Nilai buku bersih bangunan	2.068	2.200	*Net book value of buildings*
Jumlah nilai buku bersih	**15.600**	**15.732**	***Total net book value***

Selain tanah dan bangunan, tidak terdapat perbedaan yang signifikan antara nilai wajar aset tetap dengan menggunakan harga perolehan.

There is no significant difference between the fair value and carrying value using cost model of fixed assets other than land and buildings.

12. ASET TETAP DAN ASET HAK GUNA (lanjutan)

12. FIXED ASSETS AND RIGHT OF USE ASSETS (continued)

Aset hak guna:

Aset hak guna pada 31 Desember 2025 dan 2024 adalah sebagai berikut:

Right of use assets:

Rights use of assets as of December 31, 2025 and 2024 are as follows:

	31 Desember 2025/*December 31, 2025*				
	Saldo awal/ *Beginning Balance*	**Penambahan/ *Addition***	**Pengurangan/ *Deduction***	**Saldo akhir/ *Ending balance***	
Aset hak guna					***Right of use assets***
Bangunan	160.851	2.779	(1.111)	162.519	*Buildings*
Kendaraan	3.954	-	(3.954)	-	*Vehicles*
Perangkat *server*	3.581	-	-	3.581	*Server device*
Jumlah	**168.386**	**2.779**	**(5.065)**	**166.100**	***Total***
Akumulasi penyusutan					***Accumulated depreciation***
Bangunan	68.596	36.590	(1.111)	104.075	*Buildings*
Kendaraan	1.716	86	(1.802)	-	*Vehicles*
Perangkat *server*	2.122	1.193	-	3.315	*Server device*
Jumlah	**72.434**	**37.869**	**(2.913)**	**107.390**	***Total***
Nilai buku	**95.952**			**58.710**	***Book value***

	31 Desember 2024/*December 31, 2024*				
	Saldo awal/ *Beginning Balance*	**Penambahan/ *Addition***	**Pengurangan/ *Deduction***	**Saldo akhir/ *Ending balance***	
Aset hak guna					***Right of use assets***
Bangunan	128.956	69.775	(37.880)	160.851	*Buildings*
Kendaraan	5.507	-	(1.553)	3.954	*Vehicles*
Perangkat *server*	3.581	-	-	3.581	*Server device*
Jumlah	**138.044**	**69.775**	**(39.433)**	**168.386**	***Total***
Akumulasi penyusutan					***Accumulated depreciation***
Bangunan	71.075	35.401	(37.880)	68.596	*Buildings*
Kendaraan	2.015	324	(623)	1.716	*Vehicles*
Perangkat *server*	928	1.194	-	2.122	*Server device*
Jumlah	**74.018**	**36.919**	**(38.503)**	**72.434**	***Total***
Nilai buku	**64.026**			**95.952**	***Book value***

Jumlah penyusutan aset hak guna yang dibebankan pada laporan laba rugi dan penghasilan komprehensif lain adalah sebesar Rp37.869 dan Rp36.919 masing-masing untuk tahun-tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024 (Catatan 30).

The amount of depreciation of right of use assets which are charged to the statement of profit or loss and other comprehensive income amounted to Rp37,869 and Rp36,919 for the years ended December 31, 2025 and 2024, respectively (Note 30).

Rata-rata masa sewa berdasarkan kontrak yang dimiliki Bank adalah 2-7 tahun.

The average lease period based on the contracts owned by the Bank is 2-7 years.

Bank juga memiliki sewa tertentu dengan masa sewa 12 bulan atau kurang dan sewa aset bernilai rendah. Bank menerapkan pengecualian untuk sewa jangka pendek dan sewa bernilai rendah tersebut, dimana nilai sewa akan diakui sebagai biaya pada periode terjadinya.

The Bank also has certain leases with lease terms of 12 months or less and leases of low value assets. The Bank applies exemptions for short-term leases and low-value leases, where lease values will be recognised as expenses in the period incurred.

Liabilitas sewa pada tanggal 31 Desember 2025 dan 2024 diungkapkan pada Catatan 18.

Lease liabilities as of December 31, 2025 and 2024 are disclosed in Note 18.

13. ASET TAK BERWUJUD / *13. INTANGIBLE ASSETS*

Rincian aset tak berwujud adalah sebagai berikut: / *Details of intangible assets are as follows:*

	31 Desember 2025/*December 31, 2025*					
	Saldo awal/ *Beginning balance*	**Penambahan/ *Addition***	**Pengurangan/ *Deduction***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Nilai perolehan						***Cost***
Piranti lunak	166.959	18.406	(1.586)	3.466	187.245	*Software*
Lisensi ATM	4.459	-	-	-	4.459	*ATM licenses*
Aset tak berwujud dalam pembangunan	11.987	11.735	-	(3.466)	20.256	*Intangible asset under construction*
Jumlah	**183.405**	**30.141**	**(1.586)**	**-**	**211.960**	***Total***
Akumulasi amortisasi						***Accumulated amortization***
Piranti lunak	44.845	13.229	(1.586)	-	56.488	*Software*
Lisensi ATM	3.983	86	-	-	4.069	*ATM licenses*
Jumlah	**48.828**	**13.315**	**(1.586)**	**-**	**60.557**	***Total***
Nilai buku	**134.577**				**151.403**	***Book value***

	31 Desember 2024/*December 31, 2024*					
	Saldo awal/ *Beginning balance*	**Penambahan/ *Addition***	**Pengurangan/ *Deduction***	**Reklasifikasi/ *Reclassification***	**Saldo akhir/ *Ending balance***	
Nilai perolehan						***Cost***
Piranti lunak	163.706	1.879	-	1.374	166.959	*Software*
Lisensi ATM	4.459	-	-	-	4.459	*ATM licenses*
Aset tak berwujud dalam pembangunan	9.817	3.544	-	(1.374)	11.987	*Intangible asset under construction*
Jumlah	**177.982**	**5.423**	**-**	**-**	**183.405**	***Total***
Akumulasi amortisasi						***Accumulated amortization***
Piranti lunak	29.298	15.547	-	-	44.845	*Software*
Lisensi ATM	3.898	85	-	-	3.983	*ATM licenses*
Jumlah	**33.196**	**15.632**	**-**	**-**	**48.828**	***Total***
Nilai buku	**144.786**				**134.577**	***Book value***

Aset tak berwujud dalam pembangunan pada tanggal 31 Desember 2025 diperkirakan akan diselesaikan masing-masing pada kuartal pertama tahun 2026 sampai dengan kuartal pertama tahun 2027, dengan kisaran persentase penyelesaian sebesar 20%-95%.

Intangible assets under construction as of December 31, 2025, are expected to be completed between the first quarter of 2026 and the first quarter of 2027, with a percentage of completion ranging from 20%-95%.

Aset tak berwujud dalam pembangunan pada tanggal 31 Desember 2024 diperkirakan akan diselesaikan pada kuartal pertama tahun 2025 sampai dengan kuartal pertama tahun 2026 dengan kisaran persentase penyelesaian sebesar 20%-90%.

Intangible assets under construction as of December 31, 2024, are expected to be completed between the first quarter of 2025 and the first quarter of 2026, with a percentage of completion ranging from 20%-90%.

Jumlah amortisasi aset tak berwujud yang dibebankan pada laporan laba rugi dan penghasilan komprehensif lain masing-masing sebesar Rp13.315 dan Rp15.632 untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 (Catatan 30).

The amount of amortization of intangible assets is charged to the statement of profit or loss and other comprehensive income which is amounting to Rp13,315 and Rp15,632 for the years ended December 31, 2025 and 2024, respectively (Note 30).

13. ASET TAK BERWUJUD (lanjutan)

Manajemen berpendapat bahwa tidak terdapat kejadian atau perubahan keadaan yang mengindikasikan penurunan nilai aset tak berwujud pada tanggal pelaporan.

13. INTANGIBLE ASSETS (continued)

Management believes that there are no events or changes in circumstances which may indicate impairment in value of intangible assets as of reporting date.

14. ASET LAIN-LAIN / *14. OTHER ASSETS*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pihak berelasi (Catatan 36)			***Related parties (Note 36)***
Tagihan terkait pembayaran kredit *channeling* dan *direct*	6.531	4.922	*Receivables related to channeling and direct loans repayment*
Pihak ketiga			***Third parties***
Piutang bunga	203.149	252.982	*Interest receivables*
Tagihan gerbang pembayaran	172.171	110.075	*Receivables from payment gateway*
Tagihan ATM Bersama, Alto dan Prima	90.689	123.216	*Receivables from ATM Bersama Alto and Prima*
Agunan yang diambil alih (AYDA)	55.162	178.738	*Foreclosed collaterals*
Properti terbengkalai	40.335	40.335	*Abandoned property*
Biaya dibayar dimuka	33.871	36.214	*Prepaid expenses*
Setoran jaminan	11.266	11.415	*Guarantee deposit*
Uang muka	3.116	6.501	*Advance payments*
Persediaan perlengkapan kantor dan barang cetakan	6.461	3.534	*Office supplies and printed materials*
Piutang asuransi	1.683	87.896	*Insurance receivables*
Tagihan lain	27.708	414	
	645.611	851.320	
Sub jumlah	**652.142**	**856.242**	***Sub total***
Cadangan kerugian penurunan nilai:			*Allowance for impairment losses:*
Agunan yang diambil alih	(25.261)	(90.827)	*Foreclosed collaterals*
Properti terbengkalai	(13.199)	-	*Abandoned property*
Piutang asuransi	(1.683)	(84.506)	*Insurance receivables*
Tagihan lain	(19.833)	-	*Other receivables*
	(59.976)	(175.333)	
Jumlah	**592.166**	**680.909**	***Total***

Piutang asuransi merupakan tagihan yang berasal dari klaim atas debitur kredit pensiun dan kredit *channeling*.

Insurance receivables represent receivables arising from claim for pension and channeling loan.

Pada bulan Juli dan Agustus 2025 telah dilakukan penjualan Agunan yang diambil alih (AYDA) oleh Bank berupa tanah dan bangunan dengan nilai tercatat bersih (setelah dikurangi cadangan kerugian penurunan nilai) sejumlah Rp52.030 dan penjualan sejumlah Rp52.009.

On July and August 2025 Bank sold its foreclosed collaterals in the form of land and building with net carrying value (after allowance for impairment losses) amounting to Rp52,030 and amount of sales amounting to Rp52,009.

Biaya dibayar dimuka terdiri dari premi asuransi atas kredit yang diberikan, biaya renovasi gedung dan biaya penjaminan simpanan kepada Lembaga Penjamin Simpanan (LPS), dan biaya terkait operasional kantor. Seluruh biaya dibayar dimuka diamortisasi sesuai dengan umur kontrak dan masa manfaat atas biaya yang ditanggung oleh Bank.

Prepaid expenses consist of insurance premium of loans, building renovation expenses and deposit guarantee fees to Lembaga Penjamin Simpanan (LPS), and expenses related to office operations. All prepaid expenses are amortised following the length of contract and useful life of expenses paid by the Bank.

14. ASET LAIN-LAIN (lanjutan) / *14. OTHER ASSETS (continued)*

Manajemen berkeyakinan bahwa nilai agunan yang diambil alih telah mencerminkan nilai realisasi bersih.

Management believes that the foreclosed collaterals represent its net realizable value.

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai pada tanggal 31 Desember 2025 dan 2024 telah memadai.

Management believes that the allowance for impairment losses as of December 31, 2025 and 2024 is adequate.

Perubahan cadangan kerugian penurunan nilai aset lain-lain adalah sebagai berikut:

The movements in the allowance for impairment losses of other assets were as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Saldo awal			***Beginning balance***
Agunan yang diambil alih	90.827	80.794	*Foreclosed collaterals*
Piutang asuransi	84.506	31.250	*Insurance receivables*
Tagihan lain	-	17.121	*Other receivables*
	175.333	129.165	
Pembentukan/(pemulihan) penyisihan selama tahun berjalan (Catatan 29)			***Allowance/(reversal) of provision during the year (Note 29)***
Properti terbengkalai	13.199	-	*Abandoned property*
Agunan yang diambil alih	5.979	10.033	*Foreclosed collaterals*
Piutang asuransi	(396)	76.055	*Insurance receivables*
Tagihan lain	20.000	360	*Other receivables*
	38.782	86.448	
Penghapusan selama tahun berjalan			***Write-off during the year***
Piutang asuransi	(82.427)	(22.799)	*Insurance receivables*
Agunan yang diambil alih	(4.034)	-	*Foreclosed collaterals*
Tagihan lain	(167)	(17.481)	*Other receivables*
	(86.628)	(40.280)	
Penerimaan kembali			***Recoveries***
Agunan yang diambil alih	(67.511)	-	*Foreclosed collaterals*
	(67.511)	-	
Saldo akhir	**59.976**	**175.333**	***Ending balance***

15. LIABILITAS SEGERA / *15. LIABILITIES DUE IMMEDIATELY*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pihak berelasi (Catatan 36)			***Related parties (Note 36)***
Kewajiban *payment point online banking*	280	677	*Payment point online banking liabilities*
Pihak ketiga			***Third parties***
Bunga yang masih harus dibayar	119.591	106.220	*Accrued interests*
Kewajiban *merchant*	63.414	8.922	*Merchant liabilities*
Kewajiban transfer ATM dan BI-Fast	32.130	70.110	*ATM transfer and BI-Fast liabilities*
Kewajiban *payment point online banking*	7.871	4.604	*Payment point online banking liabilities*
Kewajiban transaksi gerbang pembayaran	181	218	*Payment gateway transaction liabilities*
	223.187	190.074	
Jumlah	**223.467**	**190.751**	***Total***

15. LIABILITAS SEGERA (lanjutan)

Kewajiban *merchant* merupakan kewajiban yang harus dibayarkan kepada *merchant* atas transaksi pembayaran melalui QRIS dan transaksi *lifestyle service* di *merchant online*.

15. LIABILITIES DUE IMMEDIATELY (continued)

Merchant liabilities are liabilities that must be paid to merchants for payment transactions via QRIS and lifestyle service transactions via online merchants.

16. SIMPANAN NASABAH / *16. DEPOSITS FROM CUSTOMERS*

a. Berdasarkan jenis / *a. Based on type*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah:			*Rupiah:*
Deposito berjangka	9.847.200	9.430.096	*Time deposits*
Tabungan	3.501.410	3.095.982	*Savings*
Giro	667.381	514.834	*Current accounts*
Deposito *on call*	10.151	22.880	*Deposits on call*
Jumlah simpanan nasabah - bersih	**14.026.142**	**13.063.792**	***Total deposits from customers - net***

b. Berdasarkan hubungan / *b. Based on relationship*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi			***Related parties***
Rupiah:			*Rupiah:*
Giro	113.716	50.202	*Current accounts*
Tabungan	57.092	7.838	*Savings*
Deposito berjangka	9.334	10.691	*Time deposits*
Jumlah pihak berelasi	**180.142**	**68.731**	***Total related parties***
Pihak ketiga			***Third parties***
Rupiah:			*Rupiah:*
Giro	553.665	464.632	*Current accounts*
Tabungan	3.444.318	3.088.144	*Savingsd*
Deposito berjangka	9.837.866	9.419.405	*Time deposits*
Deposito *on call*	10.151	22.880	*Deposits on call*
Jumlah pihak ketiga	**13.846.000**	**12.995.061**	***Total third parties***
Jumlah simpanan nasabah	**14.026.142**	**13.063.792**	***Total deposits from customers***

Rincian simpanan nasabah dari pihak berelasi dapat dilihat pada Catatan 36.

Details on related party deposits from customers could be seen on Note 36.

a. Giro terdiri dari: / *a. Current accounts consist of:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi			***Related parties***
Rupiah	113.716	50.202	*Rupiah*
Pihak ketiga			***Third parties***
Rupiah	553.665	464.632	*Rupiah*
Jumlah giro	**667.381**	**514.834**	***Total current accounts***

16. SIMPANAN NASABAH (lanjutan) / *16. DEPOSITS FROM CUSTOMERS (continued)*

b. Berdasarkan hubungan (lanjutan) / *b. Based on relationship (continued)*

a. Giro terdiri dari: (lanjutan) / *a. Current accounts consist of: (continued)*

Tingkat suku bunga rata-rata per tahun pada tanggal-tanggal dan 31 Desember 2025 dan 2024 adalah sebagai berikut:

The annual average interest rates as of December 31, 2025 and 2024 were as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Giro	2,26%	2,00%	*Current accounts*

Tingkat suku bunga rata-rata per tahun untuk giro dari pihak berelasi adalah sama dengan tingkat bunga yang ditawarkan kepada pihak ketiga.

The annual average interest rates on current accounts with related parties are similar to those for third parties.

Pada tanggal 31 Desember 2025 dan 2024, giro yang diblokir dan dijadikan jaminan kredit masing-masing sebesar RpNihil.

As of December 31, 2025 and 2024, current accounts held under liens and used as loan collaterals were RpNil, respectively.

b. Tabungan terdiri dari: / *b. Savings consist of:*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pihak berelasi			***Related parties***
Rupiah	57.092	7.838	*Rupiah*
Pihak ketiga			***Third parties***
Rupiah	3.444.318	3.088.144	*Rupiah*
Jumlah tabungan	**3.501.410**	**3.095.982**	***Total savings***

Tingkat suku bunga rata-rata per tahun pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The annual average interest rates as of December 31, 2025 and 2024 were as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Tabungan	0,92%	1,14%	*Savings*

Tingkat suku bunga rata-rata per tahun untuk tabungan dari pihak berelasi adalah sama dengan tingkat bunga yang ditawarkan kepada pihak ketiga.

The annual average interest rates on savings with related parties are similar to those for third parties.

Pada tanggal 31 Desember 2025 dan 2024, tidak terdapat tabungan yang diblokir dan dijadikan jaminan kredit.

As of December 31, 2025 and 2024, there were no savings held under liens and used as loan collaterals.

16. SIMPANAN NASABAH (lanjutan) / *16. DEPOSITS FROM CUSTOMERS (continued)*

b. Berdasarkan hubungan (lanjutan) / *b. Based on relationship (continued)*

c. Deposito berjangka terdiri dari: / *c. Time deposits consist of:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi			***Related parties***
Rupiah	9.334	10.691	*Rupiah*
Pihak ketiga			***Third parties***
Rupiah	9.837.866	9.419.405	*Rupiah*
Jumlah deposito berjangka	**9.847.200**	**9.430.096**	***Total time deposits***

Rincian deposito berjangka berdasarkan jangka waktu adalah sebagai berikut: / *The details of time deposits based on maturities are as follows:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
7 hari	407.641	512.960	*7 days*
1 bulan	3.282.554	3.131.372	*1 month*
3 bulan	2.828.804	2.906.971	*3 months*
6 bulan	1.644.096	1.615.546	*6 months*
12 bulan	1.684.105	1.263.247	*12 months*
Jumlah deposito berjangka	**9.847.200**	**9.430.096**	***Total time deposits***

Rincian deposito berjangka berdasarkan sisa umur sampai dengan saat jatuh tempo: / *The details of time deposit based on the remaining age until maturity:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Kurang dari atau sama dengan 1 bulan	4.806.555	4.793.667	*Less than or up to 1 month*
1 - 3 bulan	3.130.620	2.851.639	*1 - 3 months*
3 - 6 bulan	1.062.799	1.070.204	*3 - 6 months*
6 - 12 bulan	847.226	714.586	*6 - 12 months*
Jumlah deposito berjangka	**9.847.200**	**9.430.096**	***Total time deposits***

Tingkat suku bunga rata-rata per tahun untuk tahun yang berakhir pada tanggal 31 Desember 2025 dan 2024: / *The annual average interest rates for the years ended December 31, 2025 and 2024 are as follows:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Deposito berjangka	6,58%	6,64%	*Time deposits*

16. SIMPANAN NASABAH (lanjutan) / *16. DEPOSITS FROM CUSTOMERS (continued)*

b. Berdasarkan hubungan (lanjutan) / *b. Based on relationship (continued)*

c. Deposito berjangka terdiri dari: (lanjutan) / *c. Time deposits consist of: (continued)*

Tingkat suku bunga rata-rata per tahun berdasarkan jangka waktu deposito berjangka: / *The annual average interest rates based on maturities of the time deposits:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
7 hari	5,08%	5,09%	*7 days*
1 bulan	6,23%	6,24%	*1 month*
3 bulan	6,71%	6,81%	*3 months*
6 bulan	7,11%	7,47%	*6 months*
12 bulan	7,82%	7,93%	*12 months*

Tingkat suku bunga rata-rata per tahun untuk deposito berjangka dari pihak berelasi adalah sama dengan tingkat bunga yang diberlakukan terhadap pihak ketiga. / *The annual average interest rates on time deposits from related parties are similar to those for third parties.*

Pada tanggal 31 Desember 2025 dan 2024, jumlah deposito berjangka yang diblokir dan dijadikan jaminan kredit, masing-masing sebesar Rp53.600 dan Rp47.615. / *As of December 31, 2025 and 2024, time deposits held under liens and used as loan collaterals were Rp53,600 and Rp47,615, respectively.*

d. Deposito *on call* terdiri dari: / *d. Deposits on call consist of:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			***Third Parties***
Rupiah	10.151	22.880	*Rupiah*
Jumlah deposito *on call*	**10.151**	**22.880**	***Total deposits on call***

Tingkat suku bunga rata-rata per tahun pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut: / *The annual average interest rates as of December 31, 2025 and 2024 were as follows:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Deposito *on call*	3,50%	5,34%	*Deposits on call*

Pada tanggal 31 Desember 2025 dan 2024 tidak terdapat deposito *on call* yang diblokir dan dijadikan jaminan kredit. / *As of December 31, 2025 and 2024, there were no deposits on call held under liens and used as loan collaterals.*

Berdasarkan Undang-Undang No. 24 tanggal 22 September 2004 yang berlaku efektif sejak tanggal 22 September 2005, sebagaimana diubah dengan Peraturan Pemerintah Pengganti Undang-Undang Republik Indonesia No. 3 tanggal 13 Oktober 2008, Lembaga Penjaminan Simpanan (LPS) dibentuk untuk menjamin liabilitas tertentu bank-bank umum berdasarkan program penjaminan yang berlaku, yang besaran nilai jaminannya dapat berubah, jika memenuhi kriteria tertentu yang berlaku. / *Based on Law No. 24 dated September 22, 2004, effective on September 22, 2005, which was amended by the Government Regulation No. 3 dated October 13, 2008, the Indonesia Deposit Insurance Agency (LPS) was formed to guarantee certain liabilities of commercial banks under the applicable guarantee program, in which the amount of guarantee can be amended, if the situation complies with certain applicable criteria.*

16. SIMPANAN NASABAH (lanjutan)

Berdasarkan Peraturan Pemerintah Republik Indonesia No. 66 Tahun 2008 tanggal 13 Oktober 2008 mengenai Besarnya Nilai Simpanan yang dijamin, jumlah simpanan yang dijamin LPS adalah simpanan sampai dengan Rp2.000 untuk per nasabah per bank dengan tingkat suku bunga pada 31 Desember 2025 dan 2024 masing-masing sebesar 3,50% dan 4,25%.

Pada tanggal 31 Desember 2025 dan 2024, Bank adalah peserta dari program penjaminan tersebut.

Jumlah premi yang dibayarkan kepada LPS untuk tahun berjalan dicatat sebagai aset lain-lain (Catatan 14) dan telah diamortisasi sampai dengan tahun berakhir pada 31 Desember 2025 dan 2024, masing-masing sebesar Rp26.161 dan Rp28.636 (Catatan 30).

16. DEPOSITS FROM CUSTOMERS (continued)

Based on Government Regulation No. 66 Year 2008 dated October 13, 2008 regarding Amount of Deposit Guaranteed by Indonesian Deposit Insurance Agency, the amount of deposits covered by LPS for customer deposits is up to Rp2,000 per customer per bank with interest rate as of December 31, 2025 and 2024 at 3.50% and 4.25%, respectively.

As of December 31, 2025 and 2024, the Bank was a participant of that guarantee program.

Total premium payment to LPS for the year ended is recorded as other assets (Note 14) and has been amortized up to the year ended December 31, 2025, and 2024 amounted to Rp26,161 and Rp28,636, respectively (Note 30).

17. SIMPANAN DARI BANK LAIN / *17. DEPOSITS FROM OTHER BANKS*

a. Berdasarkan jenis dan jangka waktu / *a. Based on type and maturity*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Giro	1.788	4.757	*Current accounts*
Deposito berjangka			*Time deposits*
1 bulan	31.853	100.722	*1 month*
3 bulan	14.950	21.600	*3 months*
6 bulan	17.300	2.000	*6 months*
12 bulan	6.000	-	*12 months*
Jumlah simpanan dari bank lain	**71.891**	**129.079**	***Total deposits from other banks***

b. Berdasarkan hubungan / *b. Based on relationship*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak ketiga			***Third parties***
Giro	1.788	4.757	*Current accounts*
Deposito berjangka	70.103	124.322	*Time deposits*
Jumlah simpanan dari bank lain	**71.891**	**129.079**	***Total deposits from other banks***

Tingkat suku bunga rata-rata per tahun pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The annual average interest rates as of December 31, 2025 and 2024 were as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Giro	2,34%	2,36%	*Current accounts*
Deposito berjangka	5,67%	6,65%	*Time deposits*

Tidak terdapat simpanan dari bank lain yang diblokir atau dijadikan jaminan kredit.

There are no deposits from other Banks held under liens or used as loan collaterals.

18. LIABILITAS SEWA / *18. LEASE LIABILITIES*

Pada tanggal 31 Desember 2025 dan 2024, saldo liabilitas sewa adalah sebagai berikut:

As of December 31, 2025 and 2024, the balances of lease liabilities are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Liabilitas sewa			*Lease liabilities*
Bangunan	49.729	79.994	*Buildings*
Lainnya	-	409	*Others*
Jumlah	**49.729**	**80.403**	***Total***
Jumlah diakui di laba rugi			***Amounts recognized in profit or loss***
Beban bunga atas liabilitas sewa (Catatan 30)	4.239	5.520	*Interest expense on lease liabilities (Note 30)*
Beban penyusutan aset hak guna (Catatan 12)	37.869	36.919	*Depreciation expense of right of use assets (Note 12)*
Jumlah	**42.108**	**42.439**	***Total***

Analisis jatuh tempo liabilitas sewa adalah sebagai berikut:

The analysis of the maturities of lease liabilities is as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Kurang dari atau sampai dengan 1 tahun	20.813	29.643	*Less than or up to 1 year*
1-5 tahun	28.916	50.760	*1-5 years*
Jumlah	**49.729**	**80.403**	***Total***

	Saldo awal/ *Beginning balance*	**Penambahan liabilitas sewa/ *Additions of lease liabilities***	**Beban bunga atas liabilitas sewa/ *Interest expense***	**Liabilitas sewa yang telah dibayarkan/ *Payment of lease liabilities***	**Saldo akhir/ *Ending balance***	
31 Desember 2025	80.403	2.647	4.239	(37.560)	49.729	*December 31, 2025*
31 Desember 2024	52.821	67.804	5.520	(45.742)	80.403	*December 31, 2024*

19. PERPAJAKAN / *19. TAXATION*

a. Utang pajak / *a. Taxes payable*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pajak penghasilan pasal 4 ayat (2)	13.584	13.105	*Income tax article 4 (2)*
Pajak penghasilan pasal 21	1.858	316	*Income tax article 21*
Pajak penghasilan pasal 23	678	1.221	*Income tax article 23*
Pajak Pertambahan Nilai (PPN)	1.978	434	*Value Added Tax (VAT)*
Jumlah	**18.098**	**15.076**	***Total***

19. PERPAJAKAN (lanjutan) / *19. TAXATION (continued)*

b. Manfaat pajak penghasilan / *b. Income tax benefit*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Manfaat pajak tangguhan	1.515	1.201	*Deferred tax benefit*

c. Pajak penghasilan badan / *c. Corporate income tax*

Rekonsiliasi dari laba akuntansi sebelum pajak ke laba kena pajak Bank adalah sebagai berikut:

The reconciliation of accounting income before tax to taxable income of the Bank was as follows:

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Laba sebelum pajak penghasilan	564.175	18.684	*Income before income tax*
Beda permanen			***Permanent differences***
Biaya tenaga kerja	70	66	*Personnel expenses*
Biaya administrasi dan umum	797	884	*General and administrative expenses*
Beban non operasional	7.599	3.033	*Non operating expenses*
Penyusutan aset tetap dan aset hak guna	(639)	(362)	*Depreciation of fixed assets and right of use assets*
Penyisihan kerugian penurunan nilai	19.834	-	*Allowance for impairment losses*
Biaya pemasaran	(1.295)	(392)	*Marketing expenses*
Jumlah beda permanen	26.366	3.229	*Total permanent differences*
Beda temporer			***Temporary differences***
Biaya imbalan kerja karyawan	4.485	7.727	*Employee benefits expenses*
Penyusutan aset tetap	3.169	(4.786)	*Depreciation of fixed assets*
Cadangan bonus karyawan dan imbalan lain	(8.664)	8.442	*Accrual for employee bonuses and other benefits*
Penyusutan aset tak berwujud	(767)	2.518	*Depreciation of intangible assets*
Penyisihan kerugian penurunan nilai	(18.275)	(27.499)	*Allowance for impairment losses*
Jumlah beda temporer	(20.052)	(13.598)	*Total temporary differences*

19. PERPAJAKAN (lanjutan) / *19. TAXATION (continued)*

c. Pajak penghasilan badan (lanjutan) / *c. Corporate income tax (continued)*

Rekonsiliasi dari laba akuntansi sebelum pajak ke laba kena pajak Bank adalah sebagai berikut:

The reconciliation of accounting income before tax to taxable income of the Bank was as follows:

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Taksiran laba kena pajak	**570.489**	**8.315**	***Estimated taxable income***
Taksiran laba kena pajak	570.489	8.315	*Estimated taxable income*
Kompensasi akumulasi rugi fiskal	(570.489)	(8.315)	*Accumulated fiscal loss compensation*
Beban pajak penghasilan	**-**	**-**	***Income tax expense***

Jumlah akumulasi rugi fiskal Bank adalah sebagai berikut:

The amount of accumulated fiscal losses of the Bank is as follows:

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Rugi fiskal tahun 2021 (Catatan 19e)	(743.126)	(743.126)	*Fiscal loss of 2021 (Note 19e)*
Rugi fiskal tahun 2022	(743.801)	(743.801)	*Fiscal loss of 2022*
Rugi fiskal tahun 2023	(283.318)	(283.318)	*Fiscal loss of 2023*
	(1.770.245)	(1.770.245)	
Rugi fiskal yang diutilisasi - Tahun fiskal 2021	570.489	8.315	*Utilization of fiscal loss compensation Fiscal year 2021 -*
Akumulasi rugi fiskal	**(1.191.441)**	**(1.761.930)**	***Accumulated fiscal loss***

Rekonsiliasi antara beban pajak penghasilan yang dihitung dengan menggunakan tarif pajak yang berlaku dari laba sebelum pajak penghasilan adalah sebagai berikut:

A reconciliation between the total income tax expense and the amounts computed by applying the effective tax rate to income before income tax is as follows:

	Tahun yang Berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Laba sebelum pajak	564.175	18.684	*Income before tax*
Beban pajak dengan tarif pajak maksimum yang berlaku	124.119	4.110	*Corporate income tax expense based on prevailing tax rate*
Pengaruh pajak atas beda tetap pada tarif pajak maksimum yang berlaku	5.800	710	*Effect of tax on permanent differences with the prevailing tax rate*
Liabilitas pajak tangguhan yang tidak diakui	(131.434)	(6.021)	*Unrecognized deferred tax liabilities*
Manfaat pajak penghasilan	**(1.515)**	**(1.201)**	***Income tax benefit***

19. PERPAJAKAN (lanjutan) / *19. TAXATION (continued)*

c. Pajak penghasilan badan (lanjutan) / *c. Corporate income tax (continued)*

Perhitungan pajak penghasilan untuk tahun yang berakhir pada tanggal 31 Desember 2025 akan menjadi dasar dalam pengisian Surat Pemberitahuan Tahunan (SPT) Badan. Perhitungan pajak penghasilan untuk tahun yang berakhir pada tanggal 31 Desember 2024 sudah sesuai dengan Surat Pemberitahuan Tahunan (SPT) Pajak Penghasilan Badan yang dilaporkan.

The income tax calculation for the year ended December 31, 2025 will be basis for preparing Annual Income Tax Return (SPT). The income tax calculation for the year ended December 31, 2024 is already in line with the submitted Annual Income Tax Return.

d. (Liabilitas)/aset pajak tangguhan / *d. Deferred tax (liabilities)/assets*

(Liabilitas)/aset pajak tangguhan dihitung dengan tarif pajak sebesar 22% pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

The deferred tax (liabilities)/assets are calculated at tax rate of 22% as of December 31, 2025 and 2024 as follows:

	31 Desember/ *December 31,* 2024	Dikreditkan ke laporan laba rugi/ *(Charged) credited to profit or loss*	Dibebankan ke pendapatan komprehensif lainnya/ *(Charged) credited to other comprehensive income*	31 Desember/ *December 31,* 2025	
(Liabilitas)/aset pajak tangguhan					***Deferred tax (liability)/asset***
Keuntungan/(kerugian) yang belum direalisasi dari kenaikan/penurunan nilai wajar efek-efek - nilai wajar melalui penghasilan komprehensif lainnya	11.918	-	(28.666)	(16.748)	*Unrealized gain/(loss) from increase/decrease in securities - fair value through other comprehensive income*
Penyusutan aset tetap	(3.637)	697	-	(2.940)	*Depreciation of fixed assets*
Penyusutan aset tidak berwujud	1.643	(169)	-	1.474	*Depreciation of intangible assets*
Liabilitas imbalan kerja karyawan	4.959	987	(439)	5.507	*Employee benefit liabilities*
Jumlah	**14.883**	**1.515**	**(29.105)**	**(12.707)**	***Total***

	31 Desember/ *December 31,* 2023	Dikreditkan ke laporan laba rugi/ *(Charged) credited to profit or loss*	Dibebankan ke pendapatan komprehensif lainnya/ *(Charged) credited to other comprehensive income*	31 Desember/ *December 31,* 2024	
(Liabilitas)/aset pajak tangguhan					***Deferred tax (liability)/asset***
Keuntungan/(kerugian) yang belum direalisasi dari kenaikan/penurunan nilai wajar efek-efek - nilai wajar melalui penghasilan komprehensif lainnya	(2.700)	-	14.618	11.918	*Unrealized gain/(loss) from increase/decrease in securities - fair value through other comprehensive income*
Penyusutan aset tetap	(2.584)	(1.053)	-	(3.637)	*Depreciation of fixed assets*
Penyusutan aset tidak berwujud	1.089	554	-	1.643	*Depreciation of intangible assets*
Liabilitas imbalan kerja karyawan	3.210	1.700	49	4.959	*Employee benefit liabilities*
Jumlah	**(985)**	**1.201**	**14.667**	**14.883**	***Total***

19. PERPAJAKAN (lanjutan)

d. (Liabilitas)/aset pajak tangguhan (lanjutan)

Manajemen berpendapat bahwa (liabilitas)/aset pajak tangguhan yang timbul dari perbedaan temporer kemungkinan besar dapat direalisasikan pada tahun-tahun mendatang.

Pada 10 Oktober 2024, Pemerintah menerbitkan Peraturan Menteri Keuangan No. 74 Tahun 2024 tentang Pembentukan Cadangan Piutang Tak Tertagih yang Boleh Dikurangkan dari Penghasilan Bruto. Sesuai dengan ketentuan peralihan dalam Peraturan Menteri Keuangan Republik Indonesia No. 74 Tahun 2024, Bank telah melaksanakan perhitungan nilai tercatat cadangan piutang tak tertagih untuk awal tahun fiskal 2025 dan selisih lebih akan diakui sebagai biaya yang dibebankan seluruhnya untuk tahun fiskal 2025.

e. Surat ketetapan pajak

Tahun pajak 2018

Pada tanggal 21 April 2020, Bank menerima Surat Ketetapan Pajak Lebih Bayar (SKPLB) No. 00054/406/18/054/20 atas Pajak Penghasilan Badan untuk tahun fiskal 2018 sebesar Rp1.981 dimana jumlah tersebut lebih rendah dari jumlah tagihan pajak Bank sebesar Rp4.136.

Bank setuju dengan nilai lebih bayar sebesar Rp1.981 namun mengajukan keberatan untuk menerima sisa klaim sebesar Rp2.155 pada tanggal 17 Juli 2020 atas Pajak Penghasilan Badan untuk tahun fiskal 2018.

Direktur Jenderal Pajak menolak keberatan Bank atas ketetapan pajak untuk lebih bayar pajak penghasilan badan tahun 2018 dalam suratnya tertanggal 16 Juli 2021. Pada tanggal 8 Oktober 2021, Bank mengajukan banding atas putusan Direktur Jenderal Pajak ke Pengadilan Pajak. Pada tanggal 23 April 2024 Pengadilan Pajak telah mengabulkan seluruhnya atas permohonan banding Bank sesuai dengan surat putusan No. PUT-011012.15/2021/PP/M.IIIB Tahun 2024. Bank telah menerima pengembalian pajak sesuai dengan surat Direktur Jenderal Pajak |No. S-54.e/SP2B/KPP.0708/2024 tanggal 20 Mei 2024 tentang Surat Pelaksanaan Putusan Banding (SP2B) atas Putusan Nomor PUT-011012.15/2021/PP/M.IIIB Tahun 2024 tanggal 23 April 2024.

19. TAXATION (continued)

d. Deferred tax assets (liabilities) (continued)

Management believes that the deferred tax (liabilities)/assets that resulted from temporary differences are probable to be realised in the future years.

On October 10, 2024, the Govemment issued Minister of Finance Regulation (PMK) No. 74 Year 2024 concerning Establishment of Allowance for Doubtful Accounts that can be Deducted from Gross Income. Based on the transitional provisions in the Regulation of the Minister of Finance of the Republic of Indonesia No. 74 Year 2024, the Bank has calculated the carrying value of the allowance for doubtful accounts for the beginning of the fiscal year 2025, and the excess will be recognized as an expense fully charged to the fiscal year 2025.

e. Tax assessment letter

Fiscal year 2018

On April 21, 2020, the Bank received tax assessment letter of overpayment (SKPLB) No. 00054/406/18/054/20 of corporate income tax amounting to Rp1,981 for the fiscal year 2018 which was lower compared to the Bank's claim for tax refund of Rp4,136.

The Bank agreed with the overpayment of Rp1,981 but submitted an objection to receive its remaining claim of Rp2,155 on July 17, 2020 for corporate income tax year 2018.

The Director General of Tax rejected the Bank's objection on the tax assessment for the overpayment of 2018 corporate income tax through its letter dated July 16, 2021. On October 8, 2021, the Bank submitted an appeal on the decision of the Director General of Tax to the Tax Court. On April 23, 2024 the Tax Court approved the Bank's appeal based on the statement No. PUT-011012.15/2021/ PP/M.IIIB in 2024. Bank has received the tax refund according to Director General Tax letter No. S-54.e/SP2B/KPP.0708/2024 dated May 20, 2024 concerning Letter of Implementation of Appeal Decision (SP2B) regarding Decision Number PUT-011012.15/2021/PP/M.IIIB of 2024 dated April 23, 2024.

19. PERPAJAKAN (lanjutan)

e. Surat ketetapan pajak (lanjutan)

Tahun pajak 2021

Pada tanggal 7 Agustus 2023, Direktorat Jenderal Pajak (DJP) telah mengeluarkan Surat Pemberitahuan Pemeriksaan Lapangan dengan No. S-319/RIKSIS/KPP.0708/2023 dengan tujuan pemeriksaan untuk menguji kepatuhan pemenuhan kewajiban perpajakan.

Bank telah menerima surat dari DJP berupa Surat Ketetapan Pajak Pajak Nihil (SKPPN) nomor 00009/506/21/054/24 tanggal 3 Desember 2024 dan Risalah Pembahasan nomor PRIN-P-152/RIK.SIS/KPP.0708/2028 tanggal 6 Oktober 2024 atas Pajak Penghasilan Badan untuk tahun fiskal 2021. Bank menyetujui ketetapan DJP atas penyesuaian koreksi positif sebesar Rp266.948 atau lebih tinggi Rp122.350 dari jumlah koreksi positif yang dilaporkan Bank sehingga rugi fiskal menjadi Rp743.126 (Catatan 19c).

Tahun pajak 2022

Pada tanggal 20 Februari 2025, Direktorat Jenderal Pajak (DJP) telah mengeluarkan Surat Pemberitahuan Pemeriksaan Lapangan dengan No. S-27/RIKSIS/KPP.0708/2025 dengan tujuan pemeriksaan untuk menguji kepatuhan pemenuhan kewajiban perpajakan. Sampai dengan tanggal penyelesaian laporan keuangan ini, proses pemeriksaan masih berlangsung dan hasil pemeriksaan tersebut belum diketahui.

Tahun pajak 2023

Pada tanggal 25 Maret 2025, Direktorat Jenderal Pajak (DJP) telah mengeluarkan Surat Permintaan Penjelasan atas Data dan/atau Keterangan (SP2DK) No.S-57/P2DK/KPP.0708/2025 dengan hal permintaan penjelasan atas data dan/atau keterangan untuk tahun pajak 2023. Bank telah mengirimkan surat tanggapan atas SP2DK tersebut dengan nilai kurang bayar adalah sebesar RpNihil.

19. TAXATION (continued)

e. Tax assessment letter (continued)

Fiscal year 2021

On August 7, 2023, Directorate General of Tax (DGT) has issued Tax Field Examination Letter No. S-319/RIKSIS/KPP.0708/2023 in which the main purpose of this examination is to comply with the tax regulations.

The Bank has received letters from the DGT in the form of Tax Assessment Letter for Nil Tax (SKPPN) number 00009/506/21/054/24 dated December 3, 2024 and Discussion Minutes number PRIN-P-152/RIK.SIS/KPP.0708/2028 dated October 6, 2024 of Corporate Income Tax for the fiscal year 2021. The Bank agreed with the DGT's assessment over the positive correction adjustment of Rp266,948 or Rp122,350 higher than the amount of positive correction reported by the Bank and the fiscal loss amounted to Rp743,126 (Note 19c).

Fiscal year 2022

On February 20, 2025, Directorate General of Tax (DGT) has issued Tax Field Examination Letter No. S-27/RIKSIS/KPP.0708/2025 in which the main purpose of this examination is to comply with the tax regulations. Until the date of this report, the examination process is still ongoing and the examination result still unknown.

Fiscal year 2023

On March 25, 2025, Directorate General of Taxes (DGT) has issued a Request Explanation Letter for Data and/or Information (SP2DK) No. S-57/P2DK/KPP.0708/2025 with a request for explanation of data and/or information of fiscal year 2023. The Bank sent a response letter regarding the SP2DK stating that the underpayment amount is RpNil.

19. PERPAJAKAN (lanjutan)

e. Surat ketetapan pajak (lanjutan)

Tahun pajak 2023 (lanjutan)

Pada tanggal 27 Januari 2026, Direktorat Jenderal Pajak (DJP) telah mengeluarkan Surat Pemberitahuan Pemeriksaan Lapangan dengan No. PRIN-22/RIKSIS/KPP.0708/2026 dengan tujuan pemeriksaan untuk menguji kepatuhan pemenuhan kewajiban perpajakan. Sampai dengan tanggal penyelesaian laporan keuangan ini, proses pemeriksaan masih berlangsung dan hasil pemeriksaan tersebut belum diketahui.

19. TAXATION (continued)

e. Tax assessment letter (continued)

Fiscal year 2023 (continued)

On January 27, 2026, Directorate General of Tax (DGT) has issued Tax Field Examination Letter No. PRIN-22/RIKSIS/KPP.0708/2026 in which the main purpose of this examination is to comply with the tax regulations. Until the date of this report, the examination process is still ongoing and the examination result still unknown.

20. LIABILITAS IMBALAN KERJA KARYAWAN

Program pensiun

Bank memiliki program pensiun iuran pasti yang mencakup semua karyawan tetap yang memenuhi persyaratan.

Pendanaan untuk program iuran pasti terdiri dari kontribusi Bank dan karyawan masing-masing sebesar 13% dan 4% dari gaji bulanan karyawan. Program tersebut dikelola oleh Dana Pensiun Lembaga Keuangan (DPLK) Manulife Indonesia sesuai dengan perjanjian kerjasama tanggal 12 Maret 2003.

Imbalan jangka panjang lainnya

Bank memberikan Tunjangan Cuti Besar sebagaimana diatur dalam Peraturan Perusahaan, dimana karyawan akan diberikan imbalan berupa pembayaran tunai sebesar 1 (satu) kali dari upah pokok untuk setiap 6 tahun masa kerja yang diberikan di tahun berikutnya.

Perhitungan aktuaria atas liabilitas imbalan kerja karyawan

Perhitungan liabilitas imbalan kerja karyawan jangka panjang untuk tanggal 31 Desember 2025 dilakukan oleh Konsultan Aktuaria Steven dan Mourits dengan laporan No. 1110/MR-GG-PSAK219-NBC/I/2025 tanggal 19 Januari 2026 dan untuk tanggal 31 Desember 2024 dilakukan oleh Kantor Konsultan Aktuaria Steven dan Mourits dengan laporan No. 1002/MR-GG-PSAK219-NBC/I/2025 tanggal 10 Januari 2025.

Liabilitas imbalan kerja yang diakui di laporan posisi keuangan adalah sebagai berikut:

20. EMPLOYEE BENEFIT LIABILITIES

Pension plan

The Bank has a defined contribution pension plan, covering all of their qualified permanent employees.

The defined contribution plan is funded by the Bank and the employees contribution at 13% and 4%, respectively, of employees monthly basic salaries. The program was managed by Financial Institution Pension Fund (DPLK) Manulife Indonesia based on agreement dated March 12, 2003.

Other long-term benefit

The Bank has a Provision for Long Leave Allowance as regulated under the Company Regulation, whereby long leave allowance in form of cash payment of 1 (one) time basic salary for every consecutive 6 years of service will be given in the following year.

Actuarial calculations on employee benefit liabilities

The calculation of the long-term employee benefit liabilities for December 31, 2025 was conducted by Kantor Konsultan Aktuaria Steven and Mourits with No. 1110/MR-GG-PSAK219-NBC/I/2025 dated January 19, 2026, and for December 31, 2024 was conducted by Kantor Konsultan Aktuaria Steven and Mourits with report No. 1002/MR-GG-PSAK219-NBC/I/2025 dated January 10, 2025.

Employee benefit liabilities recognized in the statements of financial position are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Nilai kini kewajiban	25.030	22.540	*Present value of defined benefit obligation*

20. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

20. *EMPLOYEE BENEFIT LIABILITIES (continued)*

Perhitungan aktuaria atas liabilitas imbalan kerja karyawan (lanjutan)

Actuarial calculations on employee benefit liabilities (continued)

Rekonsiliasi perubahan saldo liabilitas pasca kerja untuk tanggal-tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

Reconciliations of changes in the liability for post-employment benefit dated December 31, 2025 and 2024 were as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ *For the Year Ended December 31, 2025*			
	Imbalan pasca kerja imbalan pasti/ *Defined post-employment benefits*	**Imbalan kerja jangka panjang lain/*Other long-term employee benefits***	**Total**	
Saldo Awal	18.660	3.880	22.540	*Beginning balance:*
Biaya jasa kini	6.110	783	6.893	*Current service costs*
Beban bunga	1.271	261	1.532	*Interest expense*
Provisi untuk imbalan terminasi	632	-	632	*Provision for excess benefit payment*
Pembayaran imbalan oleh Bank	(4.194)	(377)	(4.571)	*Benefit payment from the Bank*
Pengukuran kembali:				*Remeasurements:*
Rugi dari perubahan asumsi keuangan	1.209	-	1.209	*Loss from changes in financial* assumptions
Laba dari penyesuaian pengalaman	(3.205)	-	(3.205)	*Gain from experience adjustments*
	20.483	**4.547**	**25.030**	

	Tahun yang Berakhir pada Tanggal 31 Desember/ *For the Year Ended December 31, 2024*			
	Imbalan pasca kerja imbalan pasti/ *Defined post-employment benefits*	**Imbalan kerja jangka panjang lain/*Other long-term employee benefits***	**Total**	
Saldo Awal	12.069	2.523	14.592	*Beginning balance:*
Biaya jasa kini	6.748	1.327	8.075	*Current service costs*
Beban bunga	804	165	969	*Interest expense*
Provisi untuk imbalan terminasi	1.053	-	1.053	*Provision for excess benefit payment*
Pembayaran imbalan oleh Bank	(2.237)	(135)	(2.372)	*Benefit payment from the Bank*
Pengukuran kembali:				*Remeasurements:*
(Laba)/rugi dari perubahan asumsi keuangan	(627)	-	(627)	*(Gain)/loss from changes in financial* assumptions
Rugi/(laba) dari penyesuaian pengalaman	850	-	850	*Loss/(gain) from experience adjustments*
	18.660	**3.880**	**22.540**	

20. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

20. EMPLOYEE BENEFIT LIABILITIES (continued)

Perhitungan aktuaria atas liabilitas imbalan kerja karyawan (lanjutan)

Actuarial calculations on employee benefit liabilities (continued)

Perhitungan biaya program pensiun imbalan pasti yang diakui di dalam laporan laba rugi dan penghasilan komprehensif lain adalah sebagai berikut:

The calculations of defined contribution pension plan expenses recognized in the statements of profit or loss and other comprehensive income are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ *For the Year Ended December 31, 2025*			
	Imbalan pasca kerja imbalan pasti/ *Defined post-employment benefits*	**Imbalan kerja jangka panjang lain/*Other long-term employee benefits***	**Total**	
Biaya jasa kini	6.110	783	6.893	*Current service costs*
Beban bunga	1.271	261	1.532	*Interest expense*
Provisi untuk imbalan terminasi	632	-	632	*Provision for excess benefit payment*
Biaya imbalan kerja karyawan yang diakui di laporan laba rugi (Catatan 31)	**8.013**	**1.044**	**9.057**	***Employee Benefit Expense recognized in statement of profit or loss (Note 31)***

	Tahun yang Berakhir pada Tanggal 31 Desember/ *For the Year Ended December 31, 2024*			
	Imbalan pasca kerja imbalan pasti/ *Defined post-employment benefits*	**Imbalan kerja jangka panjang lain/*Other long-term employee benefits***	**Total**	
Biaya jasa kini	6.748	1.327	8.075	*Current service costs*
Beban bunga	804	165	969	*Interest expense*
Provisi untuk imbalan terminasi	1.053	-	1.053	*Provision for excess benefit payment*
Biaya imbalan kerja karyawan yang diakui di laporan laba rugi (Catatan 31)	**8.605**	**1.492**	**10.097**	***Employee Benefit Expense recognized in statement of profit or loss (Note 31)***

Perhitungan biaya program pensiun imbalan pasti yang diakui di dalam penghasilan komprehensif lain adalah sebagai berikut:

The calculations of defined contribution pension plan expenses recognized in other comprehensive income are as follows:

	Tahun yang Berakhir pada Tanggal 31 Desember/ *For the Year Ended December 31, 2025*			
	Imbalan pasca kerja imbalan pasti/ *Defined post-employment benefits*	**Imbalan kerja jangka panjang lain/*Other long-term employee benefits***	**Total**	
Pengukuran kembali:				*Remeasurements:*
(Rugi)/laba dari perubahan asumsi keuangan	1.209	-	1.209	*(Loss)/gain from changes in financial assumptions*
Laba/(rugi) dari penyesuaian pengalaman	(3.205)	-	(3.205)	*Gain/(loss) from experience adjustments*
Pengukuran kembali aktuaria yang diakui di penghasilan komprehensif lain	**(1.996)**	**-**	**(1.996)**	***Remeasurement recognized in other comprehensive income***

20. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

20. *EMPLOYEE BENEFIT LIABILITIES (continued)*

Perhitungan aktuaria atas liabilitas imbalan kerja karyawan (lanjutan)

Actuarial calculations on employee benefit liabilities (continued)

Perhitungan biaya program pensiun imbalan pasti yang diakui di dalam penghasilan komprehensif lain adalah sebagai berikut: (lanjutan)

The calculations of defined contribution pension plan expenses recognized in other comprehensive income are as follows: (lanjutan)

	Tahun yang Berakhir pada Tanggal 31 Desember/ *For the Year Ended December 31, 2024*			
	Imbalan pasca kerja imbalan pasti/ *Defined post-employment benefits*	**Imbalan kerja jangka panjang lain/*Other long-term employee benefits***	**Total**	
Pengukuran kembali:				*Remeasurements:*
(Rugi)/laba dari perubahan asumsi keuangan	(627)	-	(627)	*(Loss)/gain from changes in financial* assumptions
Laba/(rugi) dari penyesuaian pengalaman	850	-	850	*Gain/(loss) from experience adjustments*
Pengukuran kembali aktuaria yang diakui di penghasilan komprehensif lain	**(223)**	**-**	**(223)**	***Remeasurement recognized in other comprehensive income***

Asumsi yang digunakan dalam perhitungan aktuarial per 31 Desember 2025 dan 2024 adalah sebagai berikut:

The assumptions used in the actuarial calculation as of December 31, 2025 and 2024 are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Metode perhitungan	*Projected-Unit Credit*	*Projected-Unit Credit*	*Method of calculation*
Tingkat kenaikan gaji	6% per tahun/ *per annum*	6% per tahun/ *per annum*	*Salary increment rate*
Tingkat diskonto (IPK)	6,60% per tahun/ *per annum*	7,15% per tahun/ *per annum*	*Discount rate (PEB)*
Tingkat diskonto (IJPL)	6,30% per tahun/ *per annum*	7,10% per tahun/ *per annum*	*Discount rate (OLTEB)*
Tingkat mortalitas	TMI 4 (2019)	TMI 4 (2019)	*Mortality rate*
Tingkat kecacatan	5% dari tingkat mortalita/*mortality rate*	5% dari tingkat mortalita/*mortality rate*	*Disability rate*
Tingkat pengunduran diri	10% per tahun s/d usia 29 tahun, 9% per tahun usia 30-34 tahun, 1% per tahun usia 35-39 kemudian menurun 0,5% usia 40 tahun/ *10% p.a. until age 29, 9% p.a age 30-34, 1% p.a age 35-39, then decrease linearly to 0,5% at age 40*	10% per tahun s/d usia 29 tahun, 9% per tahun usia 30-34 tahun, 1% per tahun usia 35-39 kemudian menurun 0,5% usia 40 tahun/ *10% p.a. until age 29, 9% p.a age 30-34, 1% p.a age 35-39, then decrease linearly to 0,5% at age 40*	*Resignation rate*
Proporsi pengambilan pensiun normal	100%	100%	*Proportion of normal retirement*
Durasi kewajiban	15,14	15,35	*Liability duration*
Usia pensiun normal	56 tahun/ *age 56 years*	56 tahun/ *age 56 years*	*Normal retirement age*

20. LIABILITAS IMBALAN KERJA KARYAWAN (lanjutan)

20. EMPLOYEE BENEFIT LIABILITIES (continued)

Perhitungan aktuaria atas liabilitas imbalan kerja karyawan (lanjutan)

Actuarial calculations on employee benefit liabilities (continued)

Analisis sensitivitas

Sensitivity analysis

Perubahan satu poin persentase dalam tingkat diskonto yang diasumsikan akan memiliki dampak sebagai berikut (tidak diaudit):

A one percentage point change in the assumed discount rate would have the following effects (unaudited):

	31 Desember 2025/ *December 31, 2025*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak pada nilai kini liabilitas imbalan kerja	(1.945)	2.226	*Effect in the present value of employee benefit liabilities*

	31 Desember 2024/ *December 31, 2024*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak pada nilai kini liabilitas imbalan kerja	(1.694)	1.935	*Effect in the present value of employee benefit liabilities*

Perubahan satu poin persentase dalam tingkat kenaikan upah yang diasumsikan akan memiliki dampak sebagai berikut (tidak diaudit):

A one percentage point change in the assumed salary increase rate would have the following effects (unaudited):

	31 Desember 2025/*December 31, 2025*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak pada nilai kini liabilitas imbalan kerja	3.936	(3.411)	*Effect in the present value of employee benefit liabilities*

	31 Desember 2024/*December 31, 2024*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak pada nilai kini liabilitas imbalan kerja	3.415	(2.958)	*Effect in the present value of employee benefit liabilities*

Jatuh tempo liabilitas manfaat pasti pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut (tidak diaudit):

The maturity analysis of defined benefit plan obligation as of December 31, 2025 and 2024 is as follows (unaudited):

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Dalam waktu 12 bulan berikutnya (periode laporan tahun berikutnya)	1.744	2.196	*Within the next 12 months (the next annual reporting period)*
Antara 2 dan 5 tahun	17.499	16.768	*Between 2 and 5 years*
Antara 5 dan 10 tahun	42.218	42.877	*Between 5 and 10 years*
Di atas 10 tahun	316.916	382.863	*More than 10 years*
Jumlah	**378.377**	**444.704**	***Total***

21. LIABILITAS LAIN-LAIN / *21. OTHER LIABILITIES*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Pihak berelasi (Catatan 36)			***Related party (Note 36)***
Biaya layanan dan komisi yang masih harus dibayar	35.687	45.697	*Accrued services and commissions fee*
Pihak ketiga			***Third party***
Angsuran kredit diterima dimuka	174.436	187.308	*Loan installments received in advance*
Cadangan biaya umum	45.471	47.106	*General accrued expenses*
Cadangan biaya tenaga kerja	28.500	37.518	*Accrued personnel expenses*
Rekening *suspense*	15.754	695	*Suspense account*
Beban yang masih harus dibayar	2.368	1.000	*Accrued expenses*
Cadangan restorasi sewa	2.103	1.971	*Lease restoration accrual*
Titipan nasabah	831	2.586	*Deposits from customers*
Pendapatan diterima dimuka	11	13	*Advances payable*
Biaya asuransi kredit yang masih harus dibayar	800	6.071	*Accrued loan insurance expenses*
Lainnya	10.018	15.622	*Others*
	280.292	**299.890**	
Jumlah	**315.979**	**345.587**	***Total***

Angsuran kredit diterima dimuka merupakan pembayaran angsuran kredit yang dilakukan debitur sebelum jadwal pembayaran atau lebih besar dari jumlah angsuran seharusnya, dan akan diselesaikan sebagai pengurang pokok dan bunga pinjaman pada tanggal jatuh tempo pembayaran.

Loan installments received in advance represents loan installments paid in advance by the debtors or overpayments from the original installment amount, and will be settled as deduction to loan principal or interest on the repayment due date.

Cadangan biaya umum terdiri dari berbagai jenis biaya jasa pihak ketiga, pemasaran, umum dan administrasi, dan cadangan pungutan OJK.

General accrued expenses consist of various type of third party services, marketing, general and administrative expenses and OJK fees provision

Lainnya terdiri dari cadangan kerugian penurunan nilai atas fasilitas kredit kepada debitur yang belum digunakan dan kewajiban yang harus dikembalikan kepada pihak ketiga.

Others consist of allowance for impairment losses of unused loan facilities to debtors and refund liabilities to third parties.

22. MODAL SAHAM

Susunan pemegang saham Bank masing-masing pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

22. SHARE CAPITAL

The Bank's shareholders as of December 31, 2025 and 2024 are as follows:

Pemegang saham/*Shareholders*	31 Desember 2025/*December 31, 2025*		
	Saham (nilai penuh)/ *Number of shares (full amount)*	Modal ditempatkan dan disetor penuh (dalam Rupiah)/ *Issued and fully paid capital (in Rupiah)*	%
PT Akulaku Silvrr Indonesia	4.598.768.727	459.877	34,45%
PT Gozco Capital	1.035.384.381	103.538	7,76%
Rockcore Financial Technology Co. Ltd	736.968.376	73.697	5,52%
Masyarakat/*Public*	6.979.360.862	697.936	52,27%
Jumlah/*Total*	**13.350.482.346**	**1.335.048**	**100,00%**

Pemegang saham/*Shareholders*	31 Desember 2024/*December 31, 2024*		
	Saham (nilai penuh)/ *Number of shares (full amount)*	Modal ditempatkan dan disetor penuh (dalam Rupiah)/ *Issued and fully paid capital (in Rupiah)*	%
PT Akulaku Silvrr Indonesia	4.598.768.727	459.877	34,45%
PT Gozco Capital	962.931.705	96.293	7,21%
Rockcore Financial Technology Co. Ltd	736.968.376	73.697	5,52%
Masyarakat/*Public*	7.051.813.538	705.181	52,82%
Jumlah/*Total*	**13.350.482.346**	**1.335.048**	**100,00%**

Jumlah saham Bank yang tidak tercatat di Bursa Efek pada tanggal 31 Desember 2025 dan 2024 sebanyak 133.504.823 saham dimiliki oleh PT Akulaku Silvrr Indonesia.

The number of the Bank's shares that were not listed in the Stock Exchange as of December 31, 2025 and 2024 was 133,504,823 shares, respectively owned by PT Akulaku Silvrr Indonesia.

Pada tanggal 1 Agustus 2024, terdapat peningkatan modal disetor menjadi Rp1.335.048 sesuai keputusan RUPS No. 11 tanggal 01 Agustus 2024 dibuat dihadapan Jose Dima Satria, S.H., M.Kn., Notaris di Jakarta, yang telah disahkan Kementerian Hukum dan Hak Asasi Manusia berdasarkan surat No. AHU-AH.01.03-0179077 tanggal 5 Agustus 2024 tentang penerimaan pemberitahun perubahan anggaran dasar. Peningkatan Modal Disetor ini disetujui oleh OJK pada tanggal 14 Agustus 2024 melalui surat Nomor No. S-285/PB.32/2024 perihal Pencatatan Modal Disetor PT Bank Neo Commerce Tbk.

On August 1, 2024, there was an increase in paid in capital to become Rp1,335,048 in accordance with the statement of the GMS resolution No. 11 dated August 1, 2024 made by Jose Dima Satria, S.H., M.Kn., Notary in Jakarta, which was legalized by Ministry of Law and Human Rights based on letter No. AHU-AH.01.03-0179077 dated August 5, 2024 regarding acceptance of amendments to Articles of Association. This increase in paid up capital has been approved by OJK on August 14, 2024 through OJK Letter No. S-285/PB.32/2024 regarding the Recording of Paid-Up Capital PT Bank Neo Commerce Tbk.

Kenaikan Modal Disetor ini adalah berdasarkan pelaksanaan PUT VII Bank sebanyak 1.311.666.667 saham baru dengan nilai nominal Rp100 (nilai penuh) per saham dan harga pelaksanaan sebesar Rp300 (nilai penuh) per saham baru.

Increase in the share capital based on the implementation of LPO VII amounting to 1,311,666,667 new shares has a nominal value of Rp100 (full amount) per share and exercise price of Rp300 (full amount) per new share.

23. TAMBAHAN MODAL DISETOR / *23. ADDITIONAL PAID-IN CAPITAL*

Pada tanggal 31 Desember 2025 dan 2024, akun ini merupakan agio saham yang timbul sehubungan dengan Penawaran Umum Perdana Saham dan Penawaran Umum Terbatas kepada masyarakat dikurangi biaya emisi saham sebagai berikut:

As of December 31, 2025 and 2024, this account represents premium on share capital derived from Initial Public Offering of shares and Limited public offering to public less the related share issuance cost as follows:

Tambahan modal disetor dari penawaran Umum Perdana Saham pada tahun 2015	1.880	*Additional paid in capital from Initial Public offering in 2015*
Total setelah dikurangi biaya 31 Desember 2015		*Balance, net of share issuance cost as of December 31, 2015*
Tambahan modal disetor dari penawaran umum terbatas I	36.635	*Additional paid in capital from limited public offering I*
Waran yang telah dilaksanakan	6.151	*Exercised warrants*
Total neto waran yang telah dilaksanakan 31 Desember 2016	44.666	*Balance, net of exercised warrants as of December 31, 2016*
Waran yang telah dilaksanakan	2.722	*Exercised warrants*
Pengurangan tambahan modal disetor dari kapitalisasi ke modal disetor	(42.136)	*Reduction of additional paid-in capital due to capitalization to paid in capital*
Total setelah dikurangi biaya, waran yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2017	5.252	*Balance, net of exercised warrants and capitalization to paid in capital as of December 31, 2017*
Waran yang telah dilaksanakan	17.270	*Exercised warrants*
Total setelah waran yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2018	22.522	*Balance after exercised warrants and capitalization to paid in capital as of December 31, 2018*
Tambahan modal disetor dari penambahan modal tanpa hak memesan efek terlebih dahulu pada tahun 2019 (PMTHMETD)	111.763	*Additional paid in capital increase without pre-emptive right (PMTHMETD)*
Tambahan modal disetor dari penawaran umum terbatas II	117.630	*Additional paid in capital from limited public offering II*
Total setelah dikurangi biaya emisi yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2019	251.915	*Balance, net of exercised share issuance cost and capitalization to paid in capital as of December 31, 2019*
Tambahan modal disetor dari penawaran umum terbatas III	98.587	*Additional paid in capital from limited public offering III*
Total setelah dikurangi biaya emisi yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2020	**350.502**	***Balance, net of exercised share issuance cost and capitalization to paid in capital as of December 31, 2020***
Tambahan modal disetor dari penawaran umum terbatas IV	166.545	*Additional paid in capital from limited public offering IV*
Tambahan modal disetor dari penawaran umum terbatas V	2.310.178	*Additional paid in capital from limited public offering V*
Total setelah dikurangi biaya emisi yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2021	**2.827.225**	***Balance net of exercised share issuance cost and capitalization to paid in capital as of December 31, 2021***
Biaya emisi PUT IV yang telah dilaksanakan dan dikapitalisasi ke modal disetor	(1.781)	*Share issuance cost from exercised PUT IV and capitalized to paid in capital*
Total setelah dikurangi biaya emisi yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2022	**2.825.444**	***Balance net of exercised share issuance cost and capitalization to paid in capital as of December 31, 2022***
Tambahan modal disetor dari penawaran umum terbatas VI	1.428.461	*Additional paid in capital from limited public offering VI*
Total setelah dikurangi biaya emisi yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2023	**4.253.905**	***Balance net of exercised share issuance cost and capitalization to paid in capital as of December 31, 2023***

23. TAMBAHAN MODAL DISETOR (lanjutan)

Pada tanggal 31 Desember 2025 dan 2024, akun ini merupakan agio saham yang timbul sehubungan dengan Penawaran Umum Perdana Saham dan Penawaran Umum Terbatas kepada masyarakat dikurangi biaya emisi saham sebagai berikut: (lanjutan)

Tambahan modal disetor dari penawaran umum terbatas VII	231.539	*Additional paid in capital from limited public offering VII*
Total setelah dikurangi biaya emisi yang telah dilaksanakan dan kapitalisasi ke modal disetor 31 Desember 2024 dan 2025	**4.485.444**	***Balance net of exercised share issuance cost and capitalization to paid in capital as of December 31, 2024 and 2025***

23. ADDITIONAL PAID-IN CAPITAL (continued)

As of December 31, 2025 and 2024, this account represents premium on share capital derived from Initial Public Offering of shares and Limited public offering to public less the related share issuance cost as follows: (continued)

24. DANA SETORAN MODAL

Sehubungan dengan Penambahan Modal dengan Hak Memesan Efek Terlebih Dahulu VII (PMHMETD VII) yang disetujui Rapat Umum Pemegang Saham Luar Biasa tanggal 8 Agustus 2023, Bank telah menerima dana setoran modal sejumlah Rp105.000.000.000 (nilai penuh) pada tahun 2023 dan Rp300.000.000.000 (nilai penuh) pada tahun 2024 dari PT Akulaku Silvrr Indonesia selaku pemegang saham pengendali.

Pada tanggal 1 Agustus 2024, Bank telah menyelesaikan PMHMETD VII dengan menerbitkan 1.311.666.667 saham dengan nilai nominal Rp100 (nilai penuh) dan harga pelaksanaan sebesar Rp300 (nilai penuh) atau setara Rp393.500.000.100 (nilai penuh), dimana Rp392.901.366.000 (nilai penuh) merupakan bagian dari Dana Setoran Modal oleh PT Akulaku Silvrr Indonesia dan Rp598.634.100 (nilai penuh) merupakan pelaksanaan PMHMETD VII dari Pemegang saham lainnya. Tambahan saham tersebut telah tercatat dan dinyatakan efektif oleh Otoritas Jasa Keuangan.
Dengan demikian dana setoran modal per 31 Desember 2025 dan 2024 adalah sebesar Rp12.098.634.000 (nilai penuh).

24. CAPITAL DEPOSIT FUND

In connection with the Capital Increase with Pre-emptive Rights VII (PMHMETD VII) as agreed by the Extraordinary General Meeting of Shareholders of on August 8, 2023, the Bank has received of capital deposit fund amounted Rp105,000,000,000 (full amount) in 2023 and Rp300,000,000,000 (full amount) in 2024 from PT Akulaku Silvrr Indonesia as the controlling shareholder.

On August 1, 2024, the Bank has completed PMHMETD VII by issuing 1,311,666,667 shares with a nominal value of Rp 100 (full amount) and the implementation price of Rp300 (full amount) or equivalent to Rp393,500,000,100 (full amount). where Rp392,901,366,000 (full amount) is part of the Capital Deposit Fund by PT Akulaku Silvrr Indonesia and Rp598,634,100 (full amount) represents the exercise of PMHMETD VII from other shareholders. The additional shares have been listed and declared effective by the Financial Services Authority. Therefore capital deposit fund as per December 31, 2025 and 2024 amounted to Rp12,098,634,000 (full amount).

25. CADANGAN UMUM DAN WAJIB

Cadangan umum dan wajib dibentuk dalam rangka memenuhi ketentuan Undang-undang Perseroan Terbatas No. 40/2007 pasal 70, yang mengharuskan perusahaan Indonesia untuk membuat penyisihan cadangan umum dan wajib sebesar sekurang-kurangnya 20% dari jumlah modal yang ditempatkan dan disetor penuh. Undang-undang tersebut tidak mengatur jangka waktu untuk pembentukan penyisihan tersebut.

Pada tanggal 31 Desember 2025 dan 2024, Bank telah membentuk cadangan umum dan wajib masing-masing sebesar Rp21.087.

25. GENERAL AND LEGAL RESERVES

The general and legal reserves are established in accordance with Limited Liability Company Law No. 40/2007 article 70, which requires Indonesian companies to set up a general and legal reserve amounting to at least 20% of the issued and paid-up share capital. This particular law does not regulate the period of time in relation to the provision of such reserves.

As of December 31, 2025 and 2024, the Bank has set aside general and legal reserves amounting to Rp21,087.

26. PENDAPATAN BUNGA / *26. INTEREST INCOME*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Kredit yang diberikan	2.649.291	3.145.277	*Loans*
Pendapatan provisi dan komisi kredit	349	5.353	*Loans provision and commissions income*
Pendapatan bunga berasal dari efek-efek:			*Interest income from marketable securities:*
- Sekuritas Rupiah Bank Indonesia (SRBI)	183.582	88.988	*Bank Indonesia - Rupiah Securities (SRBI)*
- Pemerintah	144.526	183.125	*Government -*
- Non Bank	19.517	15.306	*Non Bank -*
- Bank	59	2.144	*Bank -*
Pendapatan bunga berasal dari efek-efek yang dibeli dengan janji dijual kembali	102.450	127.130	*Interest income from securities purchased under agreements to resell*
Penempatan pada Bank Indonesia dan bank lain:			*Placement with Bank Indonesia and other banks:*
- *Interbank call money*	16.329	6.990	*Interbank call money -*
- FASBI/SBI/Term Deposit	21.661	28.232	*FASBI/SBI/Term Deposit -*
Pendapatan bunga dari Giro pada Bank Indonesia	7.423	9.332	*Interest income from Current accounts with Bank Indonesia*
Pendapatan bunga dari giro pada bank lain	5	415	*Interest income from current account with other banks*
Jumlah	**3.145.192**	**3.612.292**	***Total***

Termasuk sebagai pengurang pendapatan bunga dari kredit yang diberikan untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 masing-masing sebesar Rp538.550 dan Rp1.113.607 adalah biaya layanan dan komisi teratribusi langsung atas fasilitas kredit Pinjaman Langsung yang dibayarkan kepada pihak berelasi (Catatan 36).

Included as a deduction to interest income from loans for the years ended December 31, 2025 and 2024 amounted to Rp538,550 and Rp1,113,607, respectively, are direct attributable service fees and commissions on Direct Loan facilities paid to related parties (Note 36).

27. BEBAN BUNGA / *27. INTEREST EXPENSE*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Deposito berjangka	648.210	708.221	*Time deposits*
Tabungan	126.643	147.143	*Savings*
Jasa giro	16.400	12.329	*Demand deposits*
Deposit on call	813	3.338	*Deposit on call*
Call money	128	-	*Call money*
Lainnya	-	6	*Others*
Jumlah	**792.194**	**871.037**	***Total***

27. BEBAN BUNGA (lanjutan)

Termasuk dalam beban bunga untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024 adalah beban bunga kepada pihak berelasi, masing-masing sebesar Rp1.442 dan Rp1.383.

27. INTEREST EXPENSE (continued)

Included in the interest expense for the years ended December 31, 2025 and 2024 are interest expense paid to related parties amounting to Rp1,442 and Rp1,383, respectively.

28. PENDAPATAN OPERASIONAL LAINNYA / *28. OTHER OPERATING INCOME*

	Tahun yang berakhir pada tanggal 31 Desember / *Year ended December 31,*		
	2025	**2024**	
Denda keterlambatan pembayaran pinjaman	75.195	161.791	*Penalty from late loan repayment*
Pendapatan administrasi rekening	7.887	14.249	*Accounts administration income*
Keuntungan dari penjualan efek-efek	4.299	-	*Gain on sales of marketable securities*
Lain-lain	138	2.468	*Others*
Jumlah	**87.519**	**178.508**	***Total***

29. KERUGIAN PENURUNAN NILAI ASET KEUANGAN DAN NON KEUANGAN / *29. IMPAIRMENT LOSSES ON FINANCIAL AND NON FINANCIAL ASSETS*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Pembentukan/(pemulihan) kerugian penurunan nilai atas :			*Allowance/(reversal) of impairment losses on:*
Aset keuangan			*Financial Assets*
Kredit yang diberikan (Catatan 11)	1.294.304	2.238.123	*Loans (Note 11)*
Piutang asuransi (Catatan 14)	(396)	76.055	*Insurance receivables (Note 14)*
Tagihan lain (Catatan 14)	-	360	*Other receivables (Note 14)*
Rekening administratif (Catatan 35)	1.968	(1.275)	*Administrative account (Note 35)*
Efek-efek (Catatan 9)	8	-	*Marketable securities (Note 9)*
	1.295.884	2.313.263	
Aset non keuangan			*Non financial assets*
Tagihan lain (Catatan 14)	20.000	-	*Other receivables (Note 14)*
Properti terbengkalai (Catatan 14)	13.199	-	*Abandoned properties (Note 14)*
Agunan yang diambil alih (Catatan 14)	5.979	10.033	*Foreclosed collaterals (Note 14)*
Jumlah	**1.335.062**	**2.323.296**	***Total***

30. BEBAN UMUM DAN ADMINISTRASI / *30. GENERAL AND ADMINISTRATIVE EXPENSES*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Pemeliharaan teknologi informasi	111.997	85.345	*Information technology maintenance*
Jasa pihak ketiga	81.355	108.075	*Third party service*
Transfer	67.435	93.839	*Transfer*
Penyusutan aset tetap dan aset hak guna (Catatan 12)	58.046	54.403	*Depreciation of fixed assets and right of use assets (Note 12)*
Telekomunikasi	26.361	39.819	*Telecommunication*
Premi kepada Lembaga Penjamin Simpanan (LPS):			*Premium to Lembaga Penjamin Simpanan (LPS):*
- Premi penjaminan simpanan (Catatan 16)	26.161	28.636	*Deposit insurance - premium (Note 16)*
- Premi program restrukturisasi perbankan	1.804	-	*Banking restructuring - program premium*
Konsultan	14.231	30.997	*Consultant fee*
Amortisasi aset tak berwujud (Catatan 13)	13.315	15.632	*Amortization of intangible assets (Note 13)*
Verifikasi identitas pelanggan	12.892	16.342	*Customer identity verification*
Sewa	9.598	11.420	*Rent*
Iuran tahunan OJK perbankan	8.543	8.177	*OJK Banking annual fee*
Operasional, pemeliharaan dan perbaikan kantor	5.203	7.533	*Office operational, repair and maintenance*
Beban bunga atas liabilitas sewa (Catatan 18)	4.239	5.520	*Interest expense on lease liabilities (Note 18)*
Amortisasi renovasi gedung	3.210	3.429	*Amortization of building renovation*
Layanan transaksi ATM, simpanan dan kredit kepada nasabah	2.404	4.294	*ATM, deposits and loans transaction services for customers*
Transportasi	1.597	1.979	*Transportation*
Keanggotaan	1.199	1.187	*Membership*
Administrasi agunan dan penyelesaian kredit bermasalah	211	1.299	*Collateral administration and settlement of non-performing loans*
Lainnya	3.484	5.462	*Others*
Jumlah	**453.285**	**523.388**	***Total***

Beban umum dan administrasi lainnya terdiri dari biaya Pajak Bumi dan Bangunan, pajak kendaraan, biaya *entertainment* dan lainnya

Other general and administrative expenses consist of property tax, vehicle tax, entertainment expense and others.

31. BEBAN TENAGA KERJA / *31. PERSONNEL EXPENSES*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Pihak berelasi (Catatan 36)			***Related parties (Note 36)***
Kompensasi manajemen kunci	37.494	34.300	*Compensation of key management personnel*
Pihak ketiga			***Third parties***
Biaya gaji dan upah	211.502	195.529	*Salaries and wages*
Tunjangan dana pensiun	30.074	27.418	*Pension allowances*
Tunjangan kesehatan	21.263	18.250	*Medical allowances*
Tunjangan hari raya	13.999	15.726	*Yearly allowances*
Jamsostek	12.292	12.185	*Social security*

31. BEBAN TENAGA KERJA (lanjutan) / *31. PERSONNEL EXPENSES (continued)*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Pihak ketiga (lanjutan)			***Third parties (continued)***
Imbalan kerja lainnya	10.092	11.914	*Other employee liabilities*
Imbalan kerja karyawan	9.057	10.097	*Provision for employee benefit liabilities*
Insentif/*rewards*	5.282	18.219	*Incentives/rewards*
Tunjangan premium	1.223	2.297	*Premium allowances*
Pendidikan dan Pelatihan	1.161	7.080	*Training and education expense*
Lainnya	1.012	3.746	*Others*
Jumlah	**354.451**	**356.761**	***Total***

Beban tenaga kerja lainnya terdiri dari beban aktivitas karyawan dan beban rekrutmen pegawai.

Other personnel expenses consist of employee activities expense and employee recruitment expenses.

32. BEBAN PEMASARAN / *32. MARKETING EXPENSES*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Iklan	27.648	35.843	*Advertising*
Sponsor dan promosi	22.059	42.921	*Sponsorship and promotion*
Aktivitas pemasaran kredit	8.168	4.794	*Lending marketing activities*
Lainnya	27	17	*Others*
Jumlah	**57.902**	**83.575**	***Total***

33. PENDAPATAN NON-OPERASIONAL / *33. NON-OPERATING INCOME*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Keuntungan penjualan aset tetap (Catatan 12)	639	362	*Gain on sale of fixed assets (Note 12)*
Lainnya	4.238	431	*Others*
Jumlah	**4.877**	**793**	***Total***

34. BEBAN NON-OPERASIONAL / *34. NON-OPERATING EXPENSES*

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Rugi penjualan aset tetap (Catatan 12)	64	221	*Loss on sale of fixed assets (Note 12)*
Lainnya	3.073	10.343	*Others*
Jumlah	**3.137**	**10.564**	***Total***

35. KOMITMEN DAN KONTINJENSI / *35. COMMITMENTS AND CONTINGENCIES*

Komitmen dan kontinjensi berdasarkan hubungan, kolektibilitas dan *staging* terdiri dari:

Commitments and contingencies according to the relationship, collectibility and staging consist of the following:

a. Berdasarkan hubungan: / *a. By relationship:*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			***Rupiah***
Pihak ketiga			***Third party***
Liabilitas komitmen			***Commitment liabilities***
Fasilitas kredit kepada debitur yang belum digunakan	1.290.280	7.664	*Unused loan facilities to debtors*
Tagihan kontinjensi			***Contingent receivables***
Piutang bunga atas kredit bermasalah	28.718	58.685	*Interest receivables on non performing loans*

b. Berdasarkan kolektibilitas Bank Indonesia dan penyisihan penilaian kualitas aset / *b. By Bank Indonesia collectibility and allowance of assets quality*

Kolektabilitas komitmen dan kontinjensi sesuai dengan peraturan OJK diungkapkan pada Catatan 44.

Collectability of commitments and contigencies in accordance with OJK regulation are disclosed in Note 44.

c. Berdasarkan *staging*: / *c. By staging:*

Berikut ini merupakan pergerakan saldo berdasarkan *stage* atas fasilitas kredit kepada debitur yang belum digunakan pada tanggal 31 Desember 2025 dan 2024.

Below is the movement of outstanding balance of unused loan facilities to debtors as of December 31, 2025 and 2024, respectively.

	31 Desember 2025/*December 31, 2025*				
	Stage 1	***Stage 2***	***Stage 3***	**Jumlah/*Total***	
Saldo awal					***Beginning balance***
Fasilitas kredit kepada debitur yang belum digunakan	2.064	-	5.600	7.664	*Unused loan facilities to debtors*
	2.064	**-**	**5.600**	**7.664**	
Pengukuran kembali					***Remeasurements***
Fasilitas kredit kepada debitur yang belum digunakan	1.288.216	-	(5.600)	1.282.616	*Unused loan facilities to debtors*
	1.288.216	**-**	**(5.600)**	**1.282.616**	
Saldo akhir					***Ending balance***
Fasilitas kredit kepada debitur yang belum digunakan	1.290.280	-	-	1.290.280	*Unused loan facilities to debtors*
	1.290.280	**-**	**-**	**1.290.280**	

35. KOMITMEN DAN KONTINJENSI (lanjutan)

35. COMMITMENTS AND CONTINGENCIES (continued)

c. Berdasarkan *staging*: (lanjutan)

c. By staging: (continued)

Berikut ini merupakan pergerakan saldo berdasarkan *stage* atas fasilitas kredit kepada debitur yang belum digunakan masing-masing pada tanggal 31 Desember 2025 dan 2024. (lanjutan)

Below is the movement of outstanding balance of unused loan facilities to debtors as of December 31, 2025 and 2024, respectively. (continued)

	31 Desember 2024/*December 31, 2024*				
	Stage 1	***Stage 2***	***Stage 3***	**Jumlah/*Total***	
Saldo awal					***Beginning balance***
Fasilitas kredit kepada debitur yang belum digunakan	1.073.175	-	5.100	1.078.275	*Unused loan facilities to debtors*
	1.073.175	**-**	**5.100**	**1.078.275**	
Pengukuran kembali					***Remeasurements***
Fasilitas kredit kepada debitur yang belum digunakan	(1.071.111)	-	500	(1.070.611)	*Unused loan facilities to debtors*
	(1.071.111)	-	**500**	**(1.070.611)**	
Saldo akhir					***Ending balance***
Fasilitas kredit kepada debitur yang belum digunakan	2.064	-	5.600	7.664	*Unused loan facilities to debtors*
	2.064	**-**	**5.600**	**7.664**	

Berikut ini merupakan pergerakan cadangan kerugian penurunan nilai berdasarkan *stage* atas fasilitas kredit kepada debitur yang belum digunakan masing-masing pada tanggal 31 Desember 2025 dan 2024.

Below is the movement of allowance for impairment losses of unused loan facilities to debtors as of December 31, 2025 and 2024, respectively.

	31 Desember 2024/*December 31, 2025*				
	Stage 1	***Stage 2***	***Stage 3***	**Jumlah/*Total***	
Saldo awal					***Beginning balance***
Fasilitas kredit kepada debitur yang belum digunakan	38	-	-	38	*Unused loan facilities to debtors*
	38	**-**	**-**	**38**	
Penyisihan/(pemulihan) selama tahun berjalan (Catatan 29)					***Addition/(reversal) during the year (Note 29)***
Fasilitas kredit kepada debitur yang belum digunakan	1.968	-	-	1.968	*Unused loan facilities to debtors*
	1.968	**-**	**-**	**1.968**	
Saldo akhir					***Ending balance***
Fasilitas kredit kepada debitur yang belum digunakan	2.006	-	-	2.006	*Unused loan facilities to debtors*
	2.006	**-**	**-**	**2.006**	

35. KOMITMEN DAN KONTINJENSI (lanjutan)

c. Berdasarkan *staging*: (lanjutan)

Berikut ini merupakan pergerakan cadangan kerugian penurunan nilai berdasarkan *stage* atas fasilitas kredit kepada debitur yang belum digunakan pada tanggal 31 Desember 2025 dan 2024. (lanjutan)

35. COMMITMENTS AND CONTINGENCIES (continued)

c. By staging: (continued)

Below is the movement of allowance for impairment losses of unused loan facilities to as of December 31, 2025 and 2024, respectively. (continued)

	31 Desember 2024/*December 31, 2024*				
	Stage 1	***Stage 2***	***Stage 3***	**Jumlah/*Total***	
Saldo awal					***Beginning balance***
Fasilitas kredit kepada debitur yang belum digunakan	1.313	-	-	1.313	*Unused loan facilities to debtors*
	1.313	**-**	**-**	**1.313**	
Penyisihan/(pemulihan) selama tahun berjalan (Catatan 29)					***Addition/(reversal) during the year (Note 29)***
Fasilitas kredit kepada debitur yang belum digunakan	(1.275)	-	-	(1.275)	*Unused loan facilities to debtors*
	(1.275)	**-**	**-**	**(1.275)**	
Saldo akhir					***Ending balance***
Fasilitas kredit kepada debitur yang belum digunakan	38	-	-	38	*Unused loan facilities to debtors*
	38	**-**	**-**	**38**	

Manajemen berpendapat bahwa jumlah cadangan kerugian penurunan nilai atas komitmen dan kontinjensi telah memadai.

Management believes that the allowance for impairment losses for commitments and contingencies was adequate.

36. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI

Dalam kegiatan normal usaha, Bank melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan. Semua transaksi dengan pihak-pihak berelasi telah dilakukan dengan kebijakan dan syarat yang telah disepakati bersama.

36. RELATED PARTY TRANSACTIONS

In the normal course of business, the Bank entered into transactions with related parties for ownership and/or management. All transactions with related parties have been conducted with the policies and requirements that have been agreed, by both parties.

No.	**Pihak-pihak berelasi/*Related parties***	**Sifat hubungan/*Nature of relationship***	**Transaksi/*Transaction***
1.	PT Akulaku Silvrr Indonesia (ASI)	Pemegang saham/*Shareholder*	Aset lain-lain/*Other assets* Simpanan nasabah/*Deposits from customers* Liabilitas lain-lain/*Other liabilities* Pendapatan bunga - amortisasi biaya transaksi/*Interest income – amortization of transaction cost* Beban provisi dan komisi lainnya/*Other provision and commission expenses*
2.	PT Gozco Capital	Pemegang saham/*Shareholder*	Simpanan nasabah/*Deposits from customers*
3.	PT Akulaku Finance Indonesia (AFI)	Dimiliki oleh pemegang saham akhir yang sama/*Owned by the same ultimate shareholders*	Aset lain-lain/*Other assets* Simpanan nasabah/*Deposits from customers*

36. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Dalam kegiatan normal usaha, Bank melakukan transaksi dengan pihak berelasi karena hubungan kepemilikan dan/atau kepengurusan. Semua transaksi dengan pihak-pihak berelasi telah dilakukan dengan kebijakan dan syarat yang telah disepakati bersama. (lanjutan)

36. RELATED PARTY TRANSACTIONS (continued)

In the normal course of business, the Bank entered into transactions with related parties for ownership and/or management. All transactions with related parties have been conducted with the policies and requirements that have been agreed, by both parties. (continued)

No.	Pihak-pihak berelasi/*Related parties*	Sifat hubungan/*Nature of relationship*	Transaksi/*Transaction*
4.	PT Pintar Inovasi Digital (PID)	Dimiliki oleh pemegang saham akhir yang sama/*Owned by the same ultimate shareholders*	Simpanan nasabah/*Deposits from customers*
5.	PT Inovasi Kredit Indonesia	Dimiliki oleh pemegang saham akhir yang sama/*Owned by the same ultimate shareholders*	Simpanan nasabah/*Deposits from customers*
6.	PT Pintar Platform Digital	Dimiliki oleh pemegang saham akhir yang sama/*Owned by the same ultimate shareholders*	Simpanan nasabah/*Deposits from customers*
7.	PT Solusi Digital Abadi	Dimiliki oleh pemegang saham akhir yang sama/*Owned by the same ultimate shareholders*	Liabilitas segera/*Liabilities due immediately*
8.	Dewan Komisaris dan Direksi/*Board of Commissioners and Directors*	Manajemen kunci/*Key management*	Kredit yang diberikan/*Loans* Simpanan nasabah/*Deposits from customers* Kompensasi dan remunerasi/*Compensation and remuneration*
9.	Pejabat Bank/*Bank key employees*	Manajemen kunci/*Key management*	Kredit yang diberikan/*Loans* Simpanan nasabah/*Deposits from customers* Kompensasi dan remunerasi/ *Compensation and remuneration*

Kredit yang diberikan (Catatan 11): / *Loans (Note 11):*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Dewan Komisaris dan Direksi	19.802	19.823	*Board of Commissioners and Directors*
Pejabat Bank	2.228	2.801	*Bank key employees*
Jumlah	**22.030**	**22.624**	***Total***
Persentase terhadap jumlah kredit yang diberikan - bruto	0,31%	0,26%	*Percentage to total loans - gross*

Tingkat suku bunga rata-rata per tahun untuk tahun yang berakhir 31 Desember 2025 dan 2024 masing-masing sebesar 8,16% dan 7,94%.

The annual average interest rates for the year ended December 31, 2025 and 2024 were 8.16% and 7.94%, respectively.

Aset lain-lain (Catatan 14): / *Other assets (Note 14):*

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
PT Akulaku Silvrr Indonesia	5.815	4.922	*PT Akulaku Silvrr Indonesia*
PT Akulaku Finance Indonesia	716	-	*PT Akulaku Silvrr Indonesia*
Jumlah	**6.531**	**4.922**	***Total***
Persentase terhadap jumlah aset lain-lain	1,10%	0,72%	*Percentage to other assets*

36. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Aset lain-lain yang berupa tagihan terkait pembayaran kredit merupakan tagihan terkait pembayaran kredit *channeling* dan *direct* berdasarkan perjanjian dibawah ini:

1. Perjanjian Kerjasama antara Bank dengan PT Akulaku Silvrr Indonesia (ASI) tentang Pinjaman Langsung No. PKS/269A/SET/BNC/XI/2021 tertanggal 8 November 2021, sebagaimana telah diubah dan dinyatakan kembali dengan Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama antara Bank dan ASI tentang Pinjaman Langsung No. PKS/265A/BNC-LEG/X/2022 tertanggal 11 Oktober 2022, dengan Perubahan Kedua terhadap Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama antara Bank dan ASI tentang Pinjaman Langsung No. ADD-PKS/310/BNC-LEG/X/2023 tertanggal 17 Oktober 2023, sebagaimana telah diubah dan dinyatakan kembali, terakhir dengan Perubahan Ketiga terhadap Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama antara Bank dan ASI tentang Pinjaman Langsung No. PKS/045/BNC-LEG/III/2024 tertanggal 22 Maret 2024, yang akan berlaku efektif sampai dengan tanggal 8 November 2025, dimana Bank akan memberikan fasilitas kredit kepada debitur melalui platform ASI.

   Pada 18 Maret 2025, telah dilakukan pembaharuan perhitungan biaya ASI untuk Perjanjian Kerjasama Pinjaman Langsung sebagaimana tertuang dalam Surat No. 022/ASI-LTR/DIR/III/2025 yang berlaku hingga bulan Agustus 2025. Surat tersebut kemudian ditanggapi melalui surat No. 223/SET/BNC/IX/2025 tertanggal 10 September 2025, yang menyatakan bahwa perhitungan biaya ASI berlaku hingga November 2025 sebagaimana diatur pada Perjanjian Kerjasama Pinjaman Langsung.

   Pada tanggal 3 Desember 2025, ditandatangani perpanjangan Perjanjian Kerjasama yang tertuang di dalam Perubahan dan Pernyataan Kembali Perjanjian Kerjasama antara Bank dan ASI tentang Pinjaman Langsung No. PKS/322/BNC-LEG/XII/2025, yang akan berlaku efektif sampai dengan tanggal 8 November 2027.

36. RELATED PARTY TRANSACTIONS (continued)

Other assets in form of receivables related to loan repayment represents receivables related to channeling and direct loans repayment based on the following agreements:

1. Cooperation Agreement between the Bank and PT Akulaku Silvrr Indonesia (ASI) on Direct Loan No. PKS/269A/SET/BNC/XI/2021 dated November 8, 2021, as amended and restated by Amendment and Restatement of Cooperation Agreement between Bank and ASI on Direct Loan No. PKS/265A/BNC-LEG/X/2022 dated October 11, 2022, the latest being the Second Amendment of Amendment and Restatement of Cooperation Agreement between Bank and ASI on Direct Loan No. ADD-PKS/310/BNC-LEG/X/2023 dated October 17, 2023, the latest being the Third Amendment of Amendment and Restatement of Cooperation Agreement between Bank and ASI on Direct Loan No. PKS/045/BNC-LEG/III/2024 dated March 22, 2024, which shall be effective until November 8, 2025, whereby the Bank will provide credit facilities to debtors through ASI's platform.

In March 18, 2025 , an update has been made to the calculation of ASI fee for Cooperation Agreement on Direct Loan as stated in Letter No. 022/ASI-LTR/DIR/III/2025 which shall be effective until August 2025. The letter was then responded through letter No. 223/SET/BNC/IX/2025 dated September 10, 2025, which stated that the calculation of ASI fees shall be effective until November 2025 in accordance to Cooperation Agreement on Direct Loan.

In December 3, 2025, ditandatangani signed the extension of Cooperation Agreement as stated in the Amendment and Restatement of Cooperation Agreement between Bank and ASI on Direct Loan No. PKS/322/BNC-LEG/XII/2025, which shall be effective until November 8, 2027.

36. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Aset lain-lain yang berupa tagihan terkait pembayaran kredit merupakan tagihan terkait pembayaran kredit *channeling* dan *direct* berdasarkan perjanjian dibawah ini: (lanjutan)

2. Perjanjian Kerjasama *Channeling* antara Bank dan PT Akulaku Finance Indonesia (AFI) No. PKS/053/SET/BYB/VIII/2019 tanggal 28 Agustus 2019, sebagaimana telah diubah beberapa kali, terakhir dengan Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama *Channeling* antara Bank dan AFI No. PKS/328A/BNC-LEG/XII/2022 tertanggal 9 Desember 2022, yang akan berlaku efektif sampai dengan tanggal 9 Desember 2023, dimana Bank akan melakukan pembiayaan penerusan *(channeling)* kepada debitur melalui AFI sebagai pengelola *channeling*.

   Perjanjian Kerjasama antara Bank dengan AFI tersebut telah diakhiri berdasarkan Surat Pemberitahuan Pengakhiran Kerjasama No. 206/SET/BNC/XI/2023 tertanggal 3 November 2023.

36. RELATED PARTY TRANSACTIONS (continued)

Other assets in form of receivables related to loan repayment represents receivables related to channeling and direct loans repayment based on the following agreements: (continued)

2. Channeling Cooperation Agreement between the Bank and PT Akulaku Finance Indonesia (AFI) No. PKS/053/SET/BYB/VIII/2019 dated August 28, 2019, as amended several times, the latest being Amendment and Restatement of Channeling Cooperation Agreement between Bank and AFI No. PKS/328A/BNC-LEG/XII/2022 dated December 9, 2022, which shall be effective until December 9, 2023, whereby the Bank will conduct channeling financing to debtors through AFI as the channeling manager.

The above Cooperation Agreement between the Bank and AFI has been terminated based on Notification Letter of Cooperation Termination No. 206/SET/BNC/XI/2023 dated November 3, 2023.

Liabilitas segera (Catatan 15): / *Liabilities due immediately (Note 15):*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
PT Solusi Digital Abadi	280	677	*PT Solusi Digital Abadi*
Jumlah	**280**	**677**	***Total***
Persentase terhadap jumlah liabilitas segera	0,13%	0,35%	*Percentage to total liabilities due immediately*

Simpanan nasabah (Catatan 16): / *Deposits from customers (Note 16):*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Pemegang saham	80.034	8.210	*Shareholders*
Dimiliki oleh pemegang saham akhir yang sama	33.141	40.739	*Owned by the same ultimate shareholders*
Dewan Komisaris dan Direksi	58.973	12.232	*Board of Commissioners and Directors*
Pejabat Bank	7.994	7.550	*Bank key employees*
Jumlah	**180.142**	**68.731**	***Total***
Persentase terhadap jumlah simpanan nasabah	1,28%	0,53%	*Percentage to deposits from customers*

Liabilitas lain-lain (Catatan 21): / *Other liabilities (Note 21):*

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
PT Akulaku Silvrr Indonesia	35.687	45.697	*PT Akulaku Silvrr Indonesia*
Jumlah	**35.687**	**45.697**	***Total***
Persentase terhadap jumlah liabilitas lain-lain	11,29%	13,22%	*Percentage to other liabilities*

36. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

Liabilitas lain-lain masing-masing adalah berdasarkan perjanjian dibawah ini:

1. Surat Pendamping tertanggal 1 Juli 2022 dan 29 Juli 2022 terhadap Perjanjian Kerjasama antara Bank dengan PT Akulaku Silvrr Indonesia (ASI) tentang Pinjaman Langsung No. PKS/269A/SET/BNC/2021 tanggal 8 November 2021, sebagaimana telah diubah dengan Adendum Pertama terhadap Perjanjian Kerjasama tentang Pinjaman Langsung No. ADD-PKS/150A/BNC-LEG/VII/2022 tanggal 6 Juli 2022, yang kemudian diubah dan dinyatakan kembali melalui Surat Pendamping tertanggal 15 Desember 2022 terhadap Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama antara Bank dan ASI tentang Pinjaman Langsung No. PKS/265A/BNC-LEG/X/2022 tertanggal 11 Oktober 2022, sebagaimana diubah oleh Perubahan Pertama terhadap Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama antara Bank dan ASI tentang Pinjaman Langsung No. ADD-PKS/344/BNC-LEG/2022 tertanggal 26 Desember 2022, yang kemudian diubah oleh Perubahan Kedua terhadap Perubahan dan Pernyataan Kembali Perjanjian Kerja Sama antara Bank dan ASI tentang Pinjaman Langsung No. ADD-PKS/310/BNC-LEG/X/2023 tertanggal 17 Oktober 2023, yang akan berlaku efektif sampai dengan tanggal 8 November 2025, yang mengatur ketentuan untuk fasilitas kredit Pinjaman Langsung, dimana Bank akan membayar biaya komisi dan biaya layanan kepada ASI sehubungan dengan fasilitas kredit tersebut.

   Pada 18 Maret 2025, telah dilakukan pembaharuan perhitungan biaya ASI untuk Perjanjian Kerjasama Pinjaman Langsung sebagaimana tertuang dalam Surat No. 022/ASI-LTR/DIR/III/2025 yang berlaku hingga bulan Agustus 2025. Surat tersebut kemudian ditanggapi melalui surat No. 223/SET/BNC/IX/2025 tertanggal 10 September 2025, yang menyatakan bahwa perhitungan biaya ASI berlaku hingga November 2025 sebagaimana diatur pada Perjanjian Kerjasama Pinjaman Langsung.

   Pada tanggal 3 Desember 2025, ditandatangani perpanjangan Perjanjian Kerjasama yang tertuang di dalam Perubahan dan Pernyataan Kembali Perjanjian Kerjasama antara Bank dan ASI tentang Pinjaman Langsung No. PKS/322/BNC-LEG/XII/2025, yang akan berlaku efektif sampai dengan tanggal 8 November 2027.

36. RELATED PARTY TRANSACTIONS (continued)

Other liabilities are based on the following agreements:

1. *Side Letter dated July 1, 2022 and July 29, 2022 of Cooperation Agreement between the Bank and PT Akulaku Silvrr Indonesia (ASI) on Direct Loan No. PKS/269A/SET/BNC/2021 dated November 8, 2021, as amended by First Addendum of Cooperation Agreement on Direct Loan No. ADD-PKS/150A/BNC-LEG/VII/2022 dated July 6, 2022, which was then amended and restated by Side Letter dated December 15, 2022 of Amendment and Restatement of Cooperation Agreement between Bank and ASI on Direct Loan No. PKS/265A/BNC-LEG/X/2022 dated October 11, 2022, as amended by First Addendum of Amendment and Restatement of Cooperation Agreement between the Bank and ASI on Direct Loan No. ADD-PKS/344/BNC-LEG/2022 dated December 26, 2022, which was then amended by Second Addendum of Amendment and Restatement of Cooperation Agreement between the Bank and ASI on Direct Loan No. ADD-PKS/310/BNC-LEG/X/2023 dated October 17, 2023, which shall be effective until November 8, 2025, which governs the terms for Direct Loan credit facility,whereby the Bank shall pay commission and service fee to ASI in relation to the loan facilities.*

   In March 18, 2025 , an update has been made to the calculation of ASI fee for Cooperation Agreement on Direct Loan as stated in Letter No. 022/ASI-LTR/DIR/III/2025 which shall be effective until August 2025. The letter was then responded through letter No. 223/SET/BNC/IX/2025 dated September 10, 2025, which stated that the calculation of ASI fees shall be effective until November 2025 in accordance to Cooperation Agreement on Direct Loan.

   In December 3, 2025, signed the extension of Cooperation Agreement as stated in the Amendment and Restatement of Cooperation Agreement between Bank and ASI on Direct Loan No. PKS/322/BNC-LEG/XII/2025, which shall be effective until November 8, 2027.

36. TRANSAKSI DENGAN PIHAK-PIHAK BERELASI (lanjutan)

36. RELATED PARTY TRANSACTIONS (continued)

Komitmen dan kontinjensi

Tidak terdapat saldo komitmen dan kontinjensi kepada pihak berelasi pada tanggal 31 Desember 2025 dan 2024.

Commitments and contingencies

There were no commitments and contingencies involving related parties as of December 31, 2025 and 2024.

Pendapatan bunga – Amortisasi biaya transaksi (Catatan 26)

Interest income – Amortization of transaction costs (Note 26)

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
PT Akulaku Silvrr Indonesia	(538.550)	(1.113.607)	*PT Akulaku Silvrr Indonesia*
Jumlah	**(538.550)**	**(1.113.607)**	***Total***
Persentase terhadap jumlah pendapatan bunga	17,12%	30,83%	*Percentage to total interest income*

Beban provisi dan komisi lainnya

Merupakan biaya komisi atas fasilitas kredit Pinjaman Langsung sebagai berikut:

Other provision and commission expenses

Represents commission expenses for Direct Loan facilities as follows:

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
PT Akulaku Silvrr Indonesia	-	6.712	*PT Akulaku Silvrr Indonesia*
Jumlah	**-**	**6.712**	***Total***
Persentase terhadap jumlah beban operasional	-	0,20%	*Percentage to total operating expenses*

Kompensasi manajemen kunci (Catatan 31)

Kompensasi yang dibayar atau terutang pada manajemen kunci atas jasa kepegawaian adalah sebagai berikut:

Compensation of key management personnel (Note 31)

Compensation paid to key management personnel is as follows:

	Tahun yang berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Gaji dan imbalan jangka pendek			*Salaries and short-term benefits*
Dewan Komisaris	3.380	3.240	*Board of Commissioners*
Direksi	8.143	8.218	*Board of Directors*
Pejabat Bank	25.971	22.842	*Bank key employees*
Jumlah	**37.494**	**34.300**	***Total***
Persentase terhadap jumlah beban tenaga kerja	10,58%	9,61%	*Percentage to total personnel expenses*

37. SEGMEN OPERASI / *37. OPERATING SEGMENT*

Bank melaporkan segmen wilayah geografis sebagai informasi segmen utama.

The Bank reported geographical segment as its primary segment information.

	31 Desember 2025/*December 31, 2025*				
	Jawa	**Sumatera**	**Sulawesi**	**Jumlah/*Total***	
Pendapatan bunga	3.140.578	2.280	2.334	3.145.192	*Interest income*
Beban bunga	(762.955)	(17.570)	(11.669)	(792.194)	*Interest expense*
Pendapatan bunga bersih	2.377.623	(15.290)	(9.335)	2.352.998	*Net interest income*
Jumlah pendapatan operasional lainnya	409.290	505	342	410.137	*Total other operating income*
Kerugian bersih penurunan nilai aset keuangan dan non-keuangan	(1.330.121)	(2.005)	(2.936)	(1.335.062)	*Impairment losses on financial and non-financial asset*
Beban umum dan administrasi	(449.647)	(2.451)	(1.187)	(453.285)	*General and administrative expense*
Beban tenaga kerja	(352.339)	(1.284)	(828)	(354.451)	*Personnel expense*
Beban pemasaran	(57.857)	(45)	-	(57.902)	*Marketing expense*
Laba/(rugi) operasional	596.949	(20.570)	(13.944)	562.435	*Profit/(loss) from operations*
Jumlah pendapatan non-operasional, bersih	1.653	87	-	1.740	*Total non-operating income, net*
Laba/(rugi) sebelum pajak penghasilan	598.602	(20.483)	(13.944)	564.175	*Profit/(loss) before income tax*
Manfaat pajak tangguhan	1.515	-	-	1.515	*Deferred tax benefit*
Laba/(rugi) bersih tahun berjalan	600.117	(20.483)	(13.944)	565.690	*Net profit/(loss)for the current year*
Jumlah aset	**18.524.816**	**288.446**	**160.507**	**18.973.769**	***Total assets***
Jumlah liabilitas	**14.285.636**	**292.484**	**164.923**	**14.743.043**	***Total liabilities***

	31 Desember 2024/*December 31, 2024*				
	Jawa	**Sumatera**	**Sulawesi**	**Jumlah/*Total***	
Pendapatan bunga	3.605.959	2.995	3.338	3.612.292	*Interest income*
Beban bunga	(865.929)	(1.142)	(3.966)	(871.037)	*Interest expense*
Pendapatan bunga bersih	2.740.030	1.853	(628)	2.741.255	*Net interest income*
Jumlah pendapatan operasional lainnya	579.509	1.152	271	580.932	*Total other operating income*
Kerugian bersih penurunan nilai aset keuangan dan non-keuangan	(2.310.667)	(10.079)	(2.550)	(2.323.296)	*Impairment losses on financial and non-financial asset*
Beban umum dan administrasi	(518.932)	(2.486)	(1.970)	(523.388)	*General and administrative expense*
Beban provisi dan komisi lainnya	(6.712)	-	-	(6.712)	*Other provision and commission expense*
Beban tenaga kerja	(353.623)	(1.632)	(1.506)	(356.761)	*Personnel expense*
Beban pemasaran	(83.532)	(26)	(17)	(83.575)	*Marketing expense*
Laba/(rugi) operasional	46.073	(11.218)	(6.400)	28.455	*Profit/(loss) from operations*
Jumlah (beban)/pendapatan non-operasional, bersih	(9.791)	23	(3)	(9.771)	*Total non-operating (expense)/income, net*
Laba/(rugi) sebelum pajak penghasilan	36.282	(11.195)	(6.403)	18.684	*Profit/(loss) before income tax*
Manfaat pajak tangguhan	1.201	-	-	1.201	*Deferred tax benefit*
Laba/(rugi) bersih tahun berjalan	37.483	(11.195)	(6.403)	19.885	*Net profit/(loss)for the current year*
Jumlah aset	**17.351.865**	**6.001**	**51.199**	**17.409.065**	***Total assets***
Jumlah liabilitas	**13.771.767**	**19.117**	**56.344**	**13.847.228**	***Total liabilities***

38. ASET DAN LIABILITAS KEUANGAN / *38. FINANCIAL ASSETS AND LIABILITIES*

Tabel berikut ini merupakan nilai tercatat dan nilai wajar dari aset keuangan dan liabilitas keuangan pada tanggal 31 Desember 2025 dan 2024:

The following table summarizes the carrying values and fair values of financial assets and financial liabilities as of December 31, 2025 and 2024:

	31 Desember 2025/*December 31, 2025*				
Aset dan liabilitas keuangan	**Diukur pada biaya perolehan diamortisasi/ *Measured at amortised cost***	**Diukur pada nilai wajar melalui penghasilan komprehensif lain/*Measured at fair value through other comprehensive income***	**Nilai tercatat/ *Carrying value***	**Nilai wajar/ *Fair value***	***Financial assets and liabilities***
ASET					***ASSETS***
Kas	9.760	-	9.760	9.760	*Cash*
Giro pada Bank Indonesia	1.144.566	-	1.144.566	1.144.566	*Current accounts with Bank Indonesia*
Giro pada bank lain	54.595	-	54.595	54.595	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.863.391	-	1.863.391	1.863.391	*Placements with Bank Indonesia and other banks*
Efek-efek[***)]	2.481.763	5.008.785	7.490.548	7.566.676	*Marketable securities***)*
Efek-efek yang dibeli dengan janji dijual kembali	651.407	-	651.407	669.384	*Securities purchased under agreements to resell*
Kredit yang diberikan	7.182.580	-	7.182.580	8.142.785	*Loans*
Aset lain-lain[*)]	512.966	-	512.966	512.966	*Other assets*[*)]
LIABILITAS					***LIABILITIES***
Liabilitas segera	223.467	-	223.467	223.467	*Liabilities due immediately*
Simpanan nasabah - bersih	14.026.142	-	14.026.142	14.026.142	*Deposits from customers - net*
Simpanan dari bank lain	71.891	-	71.891	71.891	*Deposits from other banks*
Liabilitas sewa	49.729	-	49.729	49.729	*Lease liabilities*
Liabilitas lain-lain[**)]	315.959	-	315.959	315.959	*Other liabilities*[**)]

	31 Desember 2024/*December 31, 2024*				
Aset dan liabilitas keuangan	**Diukur pada biaya perolehan diamortisasi/ *Measured at amortised cost***	**Diukur pada nilai wajar melalui penghasilan komprehensif lain/*Measured at fair value through other comprehensive income***	**Nilai tercatat/ *Carrying value***	**Nilai wajar/ *Fair value***	***Financial assets and liabilities***
ASET					***ASSETS***
Kas	12.133	-	12.133	12.133	*Cash*
Giro pada Bank Indonesia	1.274.118	-	1.274.118	1.274.118	*Current accounts with Bank Indonesia*
Giro pada bank lain	80.789	-	80.789	80.789	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	156.104	-	156.104	156.104	*Placements with Bank Indonesia and other banks*
Efek-efek[***)]	1.888.672	2.847.454	4.736.126	4.681.952	*Marketable securities***)*
Efek-efek yang dibeli dengan janji dijual kembali	1.878.331	-	1.878.331	1.904.374	*Securities purchased under agreements to resell*
Kredit yang diberikan	8.822.146	-	8.822.146	9.531.414	*Loans*
Aset lain-lain[*)]	590.531	-	590.531	590.531	*Other assets*[*)]
LIABILITAS					***LIABILITIES***
Liabilitas segera	190.751	-	190.751	190.751	*Liabilities due immediately*
Simpanan nasabah - bersih	13.063.792	-	13.063.792	13.063.792	*Deposits from customers - net*
Simpanan dari bank lain	129.079	-	129.079	129.079	*Deposits from other banks*
Liabilitas sewa	80.403	-	80.403	80.403	*Lease liabilities*
Liabilitas lain-lain[**)]	345.290	-	345.290	345.290	*Other liabilities*[**)]

[*)] Aset lain-lain terdiri dari tagihan terkait pembayaran kredit *channeling* dan *direct*, piutang asuransi, tagihan gerbang pembayaran, piutang bunga, tagihan ATM Bersama, Alto dan Prima, setoran jaminan dan tagihan lain.

[**)] Liabilitas lain-lain terdiri dari cadangan biaya umum, titipan nasabah, beban yang masih harus dibayar, pendapatan diterima dimuka, cadangan biaya tenaga kerja, biaya layanan dan komisi kredit yang masih harus dibayar, biaya asuransi kredit yang masih harus dibayar, angsuran kredit diterima dimuka dan lainnya.

[***)] Nilai tercatat merupakan nilai perolehan setelah amortisasi atas premium/diskon.

[*)] *Other assets consist of receivables related to channeling and direct loans repayment, insurance receivables, receivables form payment gateway, interest receivables, receivables from ATM Bersama, Alto and Prima, guarantee deposit and other receivables.*

[**)] *Other liabilities consist of general accrued expenses, deposits from customers, accrued expenses, advances payable, accrued personnel expense, accrued loan service fees and commissions, accrued loan insurance expenses, loan installments received in advance and others.*

[***)] *Carrying amount represents acquisition cost after amortization of premium/discount.*

38. ASET DAN LIABILITAS KEUANGAN (lanjutan)

Metode dan asumsi yang digunakan untuk estimasi nilai wajar adalah sebagai berikut:

a. Kredit

Kredit dinyatakan berdasarkan jumlah nilai tercatat setelah dikurangi oleh beban penurunan nilai. Estimasi nilai wajar dari kredit 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 - hirarki nilai wajar).

b. Efek-efek yang dibeli dengan janji dijual kembali

Nilai wajar untuk efek-efek yang dibeli dengan janji dijual kembali yang diukur pada biaya perolehan diamortisasi ditetapkan berdasarkan harga pasar atau harga kuotasi pedagang efek (*dealer*) (tingkat 1 - hirarki nilai wajar).

c. 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:
- Efek-efek
- Aset lain-lain

Bank menggunakan hirarki berikut untuk menentukan dan mengungkapkan nilai wajar dari instrumen keuangan:

i. Tingkat 1: dikutip (tidak disesuaikan) dari harga pasar aktif untuk aset atau liabilitas keuangan yang identik,

ii. Tingkat 2: input selain dari harga pasar aktif yang dikutip yang termasuk dalam Tingkat 1 yang dapat diobservasi untuk aset dan liabilitas, baik secara langsung (seperti harga) atau tidak langsung (turunan dari harga),

iii. Tingkat 3: input untuk aset dan liabilitas yang tidak didasarkan pada data yang dapat diobservasi di pasar (input yang tidak dapat diobservasi).

38. FINANCIAL ASSETS AND LIABILITIES (continued)

The methods and assumptions used to estimate fair value are as follows:

a. 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).

b. Securities purchased under agreements to resell

The fair value for securities purchased under agreement to resell measured at amortised cost is based on market prices or dealer price quotations (level 1 - fair value hierarchy).

c. Majority of the financial instruments not measured at fair value are measured at amortised cost. The following are financial instruments for which their carrying amounts 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:
- *Marketable securities*
- *Other assets*

The Bank adopts the following hierarchy for determining and disclosing the fair value of financial instruments:

i. Level 1: quoted (unadjusted) prices in active markets for identical financial assets or liabilities,

ii. Level 2: inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly (as prices) or indirectly (derived from prices),

iii. Level 3: inputs for the assets and liabilities that are not based on observable market data (unobservable input).

38. ASET DAN LIABILITAS KEUANGAN (lanjutan)

Tabel di bawah ini menunjukkan instrumen keuangan yang diukur pada nilai wajar yang dikelompokkan berdasarkan hirarki nilai wajar.

38. FINANCIAL ASSETS AND LIABILITIES (continued)

The table below shows the financial instruments measured at fair value grouped according to the fair value hierarchy.

31 Desember 2025/*December 31, 2025*

	Nilai tercatat/ *Carrying value*	Nilai wajar/ *Fair value* Tingkat/ *Level 1*	Tingkat/ *Level 2*	Tingkat/ *Level 3*	
ASET					***ASSETS***
Efek-efek[**)]					*Marketable securities*[**)]
- Biaya perolehan diamortisasi	2.481.763[**)]	2.481.763	-	-	*Amortized cost -*
- Nilai wajar melalui penghasilan Komprehensif lain	5.008.785[**)]	5.084.913	-	-	*Fair value through other - comprehensive income*
Efek-efek yang dibeli dengan janji dijual kembali	651.407	669.384	-	-	*Securities purchased under agreement to resell*
Kredit yang diberikan	7.182.580	-	-	8.142.785	*Loans*
Aset lain-lain[*)]	512.966	-	-	512.966	*Other assets*[*)]

31 Desember 2024/*December 31, 2024*

	Nilai tercatat/ *Carrying value*	Nilai wajar/ *Fair value* Tingkat/ *Level 1*	Tingkat/ *Level 2*	Tingkat/ *Level 3*	
ASET					***ASSETS***
Efek-efek[**)]					*Marketable securities*[**)]
- Biaya perolehan diamortisasi	1.888.672[**)]	1.888.672	-	-	*Amortized cost -*
- Nilai wajar melalui penghasilan Komprehensif lain	2.847.454[**)]	2.793.280	-	-	*Fair value through other - comprehensive income*
Efek-efek yang dibeli dengan janji dijual kembali	1.878.331	1.904.374	-	-	*Securities purchased under agreement to resell*
Kredit yang diberikan	8.822.146	-	-	9.531.414	*Loans*
Aset lain-lain[*)]	590.531	-	-	590.531	*Other assets*[*)]

[*)] Aset lain-lain terdiri dari tagihan terkait pembayaran kredit *channeling* dan *direct*, piutang asuransi, tagihan gerbang pembayaran, piutang bunga, tagihan ATM Bersama, Alto dan Prima, setoran jaminan dan tagihan lain.

[**)] Nilai tercatat merupakan nilai perolehan setelah amortisasi atas premium/diskon.

[*)] *Other assets consist of receivables related to channeling and direct loans repayment, insurance receivables, receivables form payment gateway, interest receivables, receivables from ATM Bersama, Alto and Prima, guarantee deposit and other receivables.*

[**)] *Carrying amount represents acquisition cost after amortization of premium/discount.*

39. 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.

Sebagai lembaga jasa keuangan, Bank menyadari bahwa semakin kompleksnya kegiatan usaha, yang diikuti dengan perkembangan lingkungan internal maupun eksternal dapat meningkatkan risiko dalam menjalankan kegiatan operasionalnya. Oleh karena itu, Bank senantiasa mengembangkan dan menyempurnakan kerangka manajemen risiko dan pengendalian internal yang terpadu dan komprehensif, agar dapat beradaptasi dengan perubahan yang terjadi dengan meminimalisir risiko.

39. 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.

As a financial service institution, the Bank realises that more complex business activities, followed with development of internal and external conditions can increase the Bank's risk in conducting its operational activities. Therefore, the Bank always develops and enhances an integrated and comprehensive risk management framework and internal control system to adapt with the changes, by minimizing the risk.

39. MANAJEMEN RISIKO (lanjutan)

Kerangka manajemen risiko ini dituangkan dalam bentuk kebijakan, prosedur, limit transaksi dan kewenangan serta perangkat lainnya yang berlaku bagi segenap aktivitas bisnis, dengan tetap melakukan evaluasi secara berkala dan mengembangkan parameter sesuai dengan arah perubahan bisnis yang akan ditempuh yang disesuaikan dengan *risk appetite* Bank.

Manajemen risiko adalah suatu proses yang meliputi kegiatan identifikasi, pengukuran, pengendalian, dan pemantauan risiko.

Penerapan manajemen risiko secara umum mencakup pengawasan aktif Dewan Komisaris dan Direksi, penetapan tingkat risiko yang akan diambil dan toleransi risiko, kecukupan kebijakan, prosedur Manajemen Risiko serta penetapan *limit*, kecukupan proses identifikasi pengukuran, pemantauan, dan pengendalian risiko serta sistem informasi manajemen risiko dan sistem pengendalian intern yang menyeluruh.

Dalam menunjang penerapan manajemen risiko, Bank telah membentuk Komite Pemantau Risiko dan Komite Manajemen Risiko untuk menunjang proses pengendalian risiko. Divisi *Risk Management* bertanggung jawab dalam menyusun dan menetapkan kebijakan manajemen risiko termasuk strategi manajemen risiko.

Selain hal tersebut di atas, terdapat komite lain yang bertugas untuk menangani risiko secara lebih spesifik, yaitu antara lain Komite Kredit, *Assets and Liabilities Committee* (ALCO), Komite Pengarah Teknologi Informasi, sedangkan pada level Dewan Komisaris terdapat Komite Audit dan Komite Pemantau Risiko.

Semua Dewan Komisaris dan Direksi telah mengikuti Ujian Sertifikasi Manajemen Risiko yang diselenggarakan oleh Badan Sertifikasi Manajemen Risiko dan Lembaga Sertifikasi Profesi Perbankan.

Profil risiko

Penilaian profil risiko dilakukan oleh Bank terhadap 8 (delapan) risiko, yaitu risiko kredit, risiko pasar, risiko likuiditas, risiko operasional, risiko hukum, risiko strategi, risiko kepatuhan dan risiko reputasi yang terdapat pada aktivitas fungsional Bank yang memiliki potensi kerugian bagi Bank.

39. RISK MANAGEMENT (continued)

This risk management framework is set out in the form of policies, procedures, transaction limits and authority, as well as other tools applied to all business activities, continuous regular evaluation and enhancement on the parameters in accordance with changes in the business direction adjusted with the Bank's risk appetite.

Risk management is a process that includes identification, measurement, control, and risk monitoring activities.

The implementation of risk management in general includes active supervision of the Board of Commissioners and the Board of Directors, determination of risk appetite and risk tolerance, adequacy of Risk Management policies and procedures and establishment of limits, adequacy of risk identification, monitoring and control processes as well as a comprehensive risk management information system and internal control system.

To support the implementation of risk management, the Bank has established Risk Monitoring Committee and Risk Management Committee to support the risk control process. Risk Management Division is responsible to develop and maintain the risk management policy including risk management strategy.

In addition to the above, there are other committees to handle more specific risks, such as Credit Committee, Assets and Liabilities Committee (ALCO), IT Steering Committee, whereas at the Board of Commissioners level, there are Audit Committee and Risk Monitoring Committee.

All of the Boards of Commissioners and Directors passed the examination of Risk Management Certification that was held by the Board of Risk Management Certification and Banking Professional Certification Institute.

Risk profile

Risk profile assessment is carried out by the Bank on 8 (eight) risks, namely credit risk, market risk, liquidity risk, operational risk, legal risk, strategic risk, compliance risk and reputation risk contained in the Bank's functional activities that have potential losses to the Bank.

39. MANAJEMEN RISIKO (lanjutan)

Profil risiko (lanjutan)

1. Risiko kredit

Risiko kredit timbul dari kemungkinan kegagalan pihak lawan dalam memenuhi kewajibannya kepada Bank, termasuk risiko yang ada akibat obligasi yang dimiliki oleh Bank. Tujuan dari pengelolaan risiko kredit adalah untuk mengendalikan dan mengelola eksposur risiko kredit dalam parameter yang dapat diterima, sekaligus memaksimalkan tingkat pengembalian risiko.

Pengelolaan risiko kredit juga dilakukan antara lain melalui diversifikasi portofolio risiko kredit (segmen usaha/debitur), pemantauan terhadap portofolio dan kualitas aset produktif, peningkatan aktivitas remedial, serta kecukupan pembentukan cadangan kerugian penurunan nilai.

Selain itu, di dalam melakukan pengelolaan risiko kredit, Bank berfokus pada beberapa unsur utama yang meliputi proses seleksi pembelian obligasi, proses persetujuan kredit yang transparan dan berjenjang oleh Komite Kredit, administrasi dan dokumentasi yang lengkap serta pengawasan kredit secara berkesinambungan terhadap kualitas kredit yang diberikan.

Terhadap eksposur risiko kredit yang lebih khusus seperti fasilitas antar bank dan sebagainya, Bank melakukan evaluasi secara tersendiri dengan menggunakan analisa sesuai dengan karakteristik transaksi dimaksud.

39. RISK MANAGEMENT (continued)

Risk profile (continued)

1. Credit risk

Credit risk arises from the possibility of a counterparty's failure to fulfill its obligations to the Bank, including risk due to bonds owned by the Bank. The objective of credit risk management is to control and manage credit risk exposures within acceptable parameters, while optimising the return on risk.

Credit risk management is also carried out through credit and portfolio risk diversification (business/debtor's segment), monitor the portfolio and quality of productive assets, and increase the remedial activities as well as the adequacy of allowance for impairment losses.

In addition, in managing the credit risk, the Bank focuses on several major elements which includes selection process on bonds purchase, transparent and tiering credit approval process by Credit Committee, adequate credit administration and documentation and a continuous credit monitoring on the quality of the loans portfolio.

In relation to the specific credit risk exposure such as inter-bank facility and others, the Bank separately evaluates using analysis according to the characteristics of respective transactions.

39. MANAJEMEN RISIKO (lanjutan) / *39. RISK MANAGEMENT (continued)*

Profil risiko (lanjutan) / *Risk profile (continued)*

1. Risiko kredit (lanjutan) / *Credit risk (continued)*

Eksposur maksimum risiko kredit disajikan setelah cadangan kerugian penurunan nilai tanpa memperhitungkan agunan dan pendukung kredit lainnya terhadap aset keuangan pada laporan posisi keuangan pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

Maximum credit risk exposures on financial assets are presented net after allowance for impairment losses without considering collateral and other credit supports as of December 31, 2025 and 2024 as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Giro pada Bank Indonesia	1.144.566	1.274.118	*Current accounts with Bank Indonesia*
Penempatan pada Bank Indonesia dan Bank lain	1.863.391	156.104	*Placements with Bank Indonesia and other Banks*
Giro pada bank lain	54.595	80.789	*Current accounts with other banks*
Efek-efek - bersih:			*Marketable securities - net:*
Pemerintah			*Government*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	4.704.024	2.577.126	*Fair value through other comprehensive income*
Diukur pada biaya perolehan diamortisasi	2.274.763	1.888.672	*At amortised cost*
Korporasi			*Corporate*
Diukur pada nilai wajar melalui penghasilan komprehensif lain	380.889	216.154	*Fair value through other comprehensive income*
Diukur pada biaya perolehan diamortisasi	207.000	-	*At amortised cost*
Efek-efek yang dibeli dengan janji dijual kembali	651.407	1.878.331	*Securities purchased under agreements to resell*
Kredit yang diberikan - bersih	6.667.524	8.186.901	*Loans - net*
Aset lain-lain - bersih:			*Other assets - net:*
Piutang bunga	203.149	252.982	*Interest receivables*
Tagihan terkait pembayaran kredit *channeling* dan *direct*	6.531	4.922	*Receivables related to channeling and direct loans repayment*
Tagihan ATM Bersama Alto dan Prima	90.689	123.216	*Receivables from ATM Bersama Alto and Prima*
Tagihan gerbang pembayaran	172.171	110.075	*Receivables from payment gateway*
Setoran jaminan	11.266	11.415	*Guarantee deposit*
Piutang asuransi	-	3.390	*Insurance receivables*
Tagihan lain	7.645	25	*Other receivables*
Jumlah	**18.439.610**	**16.764.220**	***Total***

Eksposur risiko kredit terhadap rekening administratif setelah cadangan kerugian penurunan nilai pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

Credit risk exposures relating to administrative accounts net after allowance for impairment losses as of December 31, 2025 and 2024 are as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Fasilitas kredit kepada debitur yang belum digunakan	1.288.274	7.626	*Unused loan facilities to debtors*
	1.288.274	**7.626**	

39. MANAJEMEN RISIKO (lanjutan) / *39. RISK MANAGEMENT (continued)*

Profil risiko (lanjutan) / *Risk profile (continued)*

1. Risiko kredit (lanjutan) / *1. Credit risk (continued)*

Berikut ini adalah nilai tercatat sebelum cadangan kerugian penurunan nilai berdasarkan *staging* untuk instrumen keuangan yang diukur pada biaya perolehan diamortisasi:

The table below represents the carrying amount before allowance for impairment losses based on staging for financial instruments measured at amortised cost:

	31 Desember 2025/*December 31, 2025*				
	Kerugian kredit Ekspektasian 12 bulan/ *12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya-kredit tidak memburuk/ *Lifetime ECL-not credit impaired*	Kerugian kredit ekspektasian sepanjang umurnya-kredit memburuk/ *Lifetime ECL-credit-impaired*	Jumlah/*Total*	
Kas	9.760	-	-	9.760	*Cash*
Giro pada Bank Indonesia	1.144.566	-	-	1.144.566	*Current accounts with Bank Indonesia*
Giro pada bank lain	54.595	-	-	54.595	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.863.391	-	-	1.863.391	*Placements with Bank Indonesia and other banks*
Efek-efek	2.481.763	-	-	2.481.763	*Marketable Securities*
Efek yang dibeli dengan janji dijual kembali	651.407	-	-	651.407	*Securities purchased under agreement to resell*
Kredit yang diberikan	6.581.800	343.693	257.087	7.182.580	*Loans*
Aset lain-lain*)	485.488	-	27.478	512.966	*Other assets*)
Jumlah	**13.272.770**	**343.693**	**284.565**	**13.901.028**	***Total***
Cadangan kerugian penurunan nilai	(206.658)	(116.626)	(213.290)	(536.574)	*Allowance for impairment losses*
Jumlah - bersih	**13.066.112**	**227.067**	**71.275**	**13.364.454**	***Total - net***

	31 Desember 2024/*December 31, 2024*				
	Kerugian kredit Ekspektasian 12 bulan/ *12-month ECL*	Kerugian kredit ekspektasian sepanjang umurnya-kredit tidak memburuk/ *Lifetime ECL-not credit impaired*	Kerugian kredit ekspektasian sepanjang umurnya-kredit memburuk/ *Lifetime ECL credit-impaired*	Jumlah/*Total*	
Kas	12.133	-	-	12.133	*Cash*
Giro pada Bank Indonesia	1.274.118	-	-	1.274.118	*Current accounts with Bank Indonesia*
Giro pada bank lain	80.789	-	-	80.789	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	156.104	-	-	156.104	*Placements with Bank Indonesia and other banks*
Efek-efek	1.888.672	-	-	1.888.672	*Marketable Securities*
Efek yang dibeli dengan janji dijual kembali	1.878.331	-	-	1.878.331	*Securities purchased under agreement to resell*
Kredit yang diberikan	8.057.758	444.506	319.882	8.822.146	*Loans*
Aset lain-lain*)	590.115	-	416	590.531	*Other assets*)
Jumlah	**13.938.020**	**444.506**	**320.298**	**14.702.824**	***Total***
Cadangan kerugian penurunan nilai	(287.121)	(144.606)	(288.024)	(719.751)	*Allowance for impairment losses*
Jumlah - bersih	**13.650.899**	**299.900**	**32.274**	**13.983.073**	***Total - net***

*) Aset lain-lain terdiri dari tagihan terkait pembayaran kredit *channeling* dan *direct*, piutang asuransi, tagihan gerbang pembayaran, piutang bunga, tagihan lain dari debitur, tagihan ATM Bersama, Alto dan Prima, setoran jaminan dan tagihan lain.

*) *Other assets consist of receivables related to channeling and direct loans repayment, insurance receivables, receivables from payment gateway, interest receivables, other receivables from debtor, receivables from ATM Bersama, Alto and Prima, guarantee deposit and other receivables.*

39. MANAJEMEN RISIKO (lanjutan)

Profil risiko (lanjutan)

2. Risiko pasar

Risiko pasar adalah risiko pada laporan posisi keuangan dan rekening administratif, akibat perubahan dari kondisi pasar. Risiko pasar yang dihadapi oleh Bank terutama risiko suku bunga.

Risiko tingkat suku bunga

Risiko tingkat suku bunga timbul dari adanya kemungkinan bahwa perubahan tingkat suku bunga akan mempengaruhi arus kas masa depan dari instrumen keuangan.

Tabel di bawah ini mengikhtisarkan sensitivitas (rugi) laba bersih Bank atas perubahan tingkat suku bunga aset dan liabilitas dengan suku bunga variabel, masing-masing sebesar 100 basis poin untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024:

39. RISK MANAGEMENT (continued)

Risk profile (continued)

2. Market risk

Market risk is the risk in the statement of financial position and off balance sheet positions, due to changes in market conditions. The market risk also faced by the Bank is mainly interest rate risk.

Interest rate risk

Interest rate risk arises from the possibility that changes in interest rates will affect future cash flows of financial instruments.

The following table summarises the sensitivity of the Bank's net (loss)/income to changes in interest rates of financial assets and liabilities with variable interest rates, at 100 basis point for the years ended December 31, 2025 and 2024, respectively:

	31 Desember 2025/*December 31, 2025*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak terhadap laba bersih	(22.266)	22.266	*Impact to net profit*

	31 Desember 2024/*December 31, 2024*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak terhadap laba bersih	(5.411)	5.411	*Impact to net profit*

Proyeksi di atas mengasumsikan bahwa tingkat suku bunga bergerak pada jumlah yang sama, sehingga tidak mencerminkan pengaruh potensial (rugi) 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.

The above projection assumes that interest rates move by the same amount and, therefore, do not reflect the (loss)/income 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.

39. MANAJEMEN RISIKO (lanjutan) / *39. RISK MANAGEMENT (continued)*

Profil risiko (lanjutan) / *Risk profile (continued)*

2. Risiko pasar (lanjutan) / *2 Market risk (continued)*

Risiko harga / *Price risk*

Tabel di bawah ini mengikhtisarkan sensitivitas penghasilan komprehensif lain Bank atas perubahan harga pasar efek-efek dalam klasifikasi nilai wajar melalui penghasilan komprehensif lain, masing-masing sebesar 100 basis poin untuk tahun yang berakhir pada tanggal-tanggal 31 Desember 2025 dan 2024:

The table below summarizes the sensitivity of the Bank's other comprehensive income to changes in market price of marketable securities classified as fair value through other comprehensive income by 100 basis points for the years ended December 31, 2025 and 2024, respectively:

	31 Desember 2025/*December 31, 2025*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak terhadap keuntungan/ (kerugian) yang belum direalisasi atas nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	50.677	(50.677)	*Impact on unrealized gain/(loss) in fair value of marketable securities measured at fair value through other comprehensive income*

	31 Desember 2024/*December 31, 2024*		
	Kenaikan/ *Increase*	**Penurunan/ *Decrease***	
Dampak terhadap keuntungan/ (kerugian) yang belum direalisasi atas nilai wajar efek-efek yang diukur pada nilai wajar melalui penghasilan komprehensif lain	28.581	(28.581)	*Impact on unrealized gain/(loss) in fair value of marketable securities measured at fair value through other comprehensive income*

Risiko nilai tukar / *Foreign exchange risk*

Risiko nilai tukar yakni risiko terjadinya ketidakpastian ekspektasi yang diakibatkan oleh pergerakan nilai tukar dari mata uang yang digunakan oleh Bank. Bank belum menjadi Bank Devisa, oleh karena itu Bank tidak memiliki eksposur yang material terhadap fluktuasi nilai tukar karena Bank tidak memiliki aset dan liabilitas moneter dalam mata uang asing.

Foreign exchange risk is the risk of uncertainty of expectation due to changes in the exchange rates of the foreign currencies used by the Bank. The Bank is not yet a Foreign Exchange Bank, therefore the Bank does not have material exposure to exchange rate fluctuations because the Bank does not have monetary assets and liabilities in foreign currencies.

3. Risiko likuiditas / *3. Liquidity risk*

Risiko likuiditas adalah risiko akibat ketidakmampuan Bank untuk memenuhi kewajiban jatuh tempo dari sumber pendanaan arus kas dan/atau dari aset likuid berkualitas tinggi yang dapat diagunkan tanpa mengganggu aktivitas dan kondisi keuangan Bank. Pengelolaan likuiditas dan aset-liabilitas dilakukan dibawah koordinasi *Asset and Liability Committee* (ALCO) yang setiap bulannya melakukan rapat dengan melibatkan unit bisnis, tresuri, kredit, dan unit-unit lain yang relevan, untuk memastikan tercapainya posisi likuiditas pada tingkat yang diharapkan.

Liquidity risk is the risk resulting from the Bank's inability to meet maturing obligations from cash flow funding sources and/or from high-quality liquid assets that can be pledged without disrupting the Bank's activities and financial condition. Liquidity and asset-liability management is carried out under the coordination of the Asset and Liability Committee (ALCO) which holds monthly meetings involving business units, treasury, credit, and other relevant units, to ensure the achievement of the liquidity position at the expected level.

39. MANAJEMEN RISIKO (lanjutan)

39. RISK MANAGEMENT (continued)

Profil risiko (lanjutan)

Risk profile (continued)

3. Risiko likuiditas (lanjutan)

3. Liquidity risk (continued)

Bank mengukur dan memantau risiko likuiditas melalui analisis konsentrasi aset dan liabilitas, transaksi rekening administrasi, serta kemampuan akses pada sumber-sumber pendanaan. Bank juga memantau risiko likuiditas dengan memantau gap jatuh tempo likuiditas Bank termasuk rasio-rasio likuiditas.

The Bank measures and monitors liquidity risk through analysis of the concentration of assets and liabilities, administrative account transactions, as well as the ability to access funding sources. The Bank also monitors liquidity risk by monitoring the Bank's liquidity maturity gap, including liquidity ratios.

Tabel dibawah ini menyajikan analisa jatuh tempo aset dan liabilitas keuangan Bank pada tanggal 31 Desember 2025 dan 2024, berdasarkan jangka waktu yang tersisa sampai tanggal jatuh tempo kontrak:

The table below presents the analysis of the maturity of financial assets and liabilities of Bank as of December 31, 2025 and 2024, based on the remaining period until the maturity date of the contract:

31 Desember 2025/*December 31, 2025*

	< 1 bulan/ *< 1 month*	**>1-3 bulan/ *>1-3 months***	**>3-6 bulan/ *>3-6 months***	**>6-12 bulan/ *>6-12 months***	**>12 bulan/ *>12 months***	**Jumlah/ *Total***	
Aset							***Assets***
Kas	9.760	-	-	-	-	9.760	*Cash*
Giro pada Bank Indonesia	1.144.566	-	-	-	-	1.144.566	*Current accounts with Bank Indonesia*
Giro pada Bank lain	54.595	-	-	-	-	54.595	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	1.863.391	-	-	-	-	1.863.391	*Placements with Bank Indonesia and other banks*
Efek-efek	549.211	1.637.399	2.010.934	1.182.321	2.186.811	7.566.676	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	651.407	-	-	-	-	651.407	*Securities purchased under agreements to resell*
Kredit yang diberikan	1.321.666	1.973.594	1.638.821	1.542.757	705.742	7.182.580	*Loans*
Aset lain-lain *)	468.110	33.590	-	-	11.266	512.966	*Other assets *)*
Jumlah	**6.062.706**	**3.644.583**	**3.649.755**	**2.725.078**	**2.903.819**	**18.985.941**	***Total***
Liabilitas							***Liabilities***
Liabilitas segera	223.467	-	-	-	-	223.467	*Liabilities due immediately*
Simpanan nasabah	8.985.497	3.130.620	1.062.799	847.226	-	14.026.142	*Deposits from customers*
Simpanan dari bank lain	37.618	10.973	17.300	6.000	-	71.891	*Deposits from other banks*
Liabilitas sewa	-	8.044	3.186	9.572	28.927	49.729	*Lease liabilities*
Liabilitas lain-lain**)	239.905	45.154	16.067	12.730	2.103	315.959	*Other liabilities**)*
Jumlah	**9.486.487**	**3.194.791**	**1.099.352**	**875.528**	**31.030**	**14.687.188**	***Total***
Perbedaan jatuh tempo	**(3.423.781)**	**449.792**	**2.550.403**	**1.849.550**	**2.872.789**	**4.298.753**	***Maturity gap***

31 Desember 2024/*December 31, 2024*

	< 1 bulan/ *< 1 month*	**>1-3 bulan/ *>1-3 months***	**>3-6 bulan/ *>3-6 months***	**>6-12 bulan/ *>6-12 months***	**>12 bulan/ *>12 months***	**Jumlah/ *Total***	
Aset							***Assets***
Kas	12.133	-	-	-	-	12.133	*Cash*
Giro pada Bank Indonesia	1.274.118	-	-	-	-	1.274.118	*Current accounts with Bank Indonesia*
Giro pada Bank lain	80.789	-	-	-	-	80.789	*Current accounts with other banks*
Penempatan pada Bank Indonesia dan bank lain	156.104	-	-	-	-	156.104	*Placements with Bank Indonesia and other banks*
Efek-efek	733.458	904.101	291.040	-	2.753.353	4.681.952	*Marketable securities*
Efek-efek yang dibeli dengan janji dijual kembali	1.878.331	-	-	-	-	1.878.331	*Securities purchased under agreements to resell*
Kredit yang diberikan	1.826.600	2.111.901	1.665.008	1.945.130	1.273.507	8.822.146	*Loans*
Aset lain-lain *)	532.667	46.449	-	-	11.415	590.531	*Other assets *)*
Jumlah	**6.494.200**	**3.062.451**	**1.956.048**	**1.945.130**	**4.038.275**	**17.496.104**	***Total***

*) Aset lain-lain terdiri dari tagihan terkait pembayaran kredit *channeling* dan *direct*, piutang asuransi, tagihan gerbang pembayaran, piutang bunga, tagihan ATM Bersama, Alto dan Prima, setoran jaminan dan tagihan lain.

**) Liabilitas lain-lain terdiri dari cadangan biaya umum, titipan nasabah, beban yang masih harus dibayar, pendapatan diterima dimuka, bonus, biaya layanan dan komisi kredit yang masih harus dibayar, biaya asuransi kredit yang masih harus dibayar, angsuran kredit diterima dimuka dan lainnya.

*) *Other assets consist of receivables related to channeling and direct loans repayment, insurance receivables, receivables from payment gateway, interest receivables, receivables from ATM Bersama, Alto and Prima, guarantee deposit and other receivables.*

**) *Other liabilities consist of general accrued expenses, deposits from customers, accrued expenses, advances payable, bonus, accrued loan service fees and commissions, accrued loan insurance expenses, loan installments received in advance and others.*

39. MANAJEMEN RISIKO (lanjutan)

Profil risiko (lanjutan)

3. Risiko likuiditas (lanjutan)

Tabel dibawah ini menyajikan analisa jatuh tempo aset dan liabilitas keuangan Bank pada tanggal 31 Desember 2025 dan 2024, berdasarkan jangka waktu yang tersisa sampai tanggal jatuh tempo kontrak: (lanjutan)

39. RISK MANAGEMENT (continued)

Risk profile (continued)

3. Liquidity risk (continued)

The table below presents the analysis of the maturity of financial assets and liabilities of Bank as of December 31, 2025 and 2024, based on the remaining period until the maturity date of the contract: (continued)

31 Desember 2024/*December 31, 2024*

	< 1 bulan/ *< 1 month*	>1-3 bulan/ *>1-3 months*	>3-6 bulan/ *>3-6 months*	>6-12 bulan/ *>6-12 months*	>12 bulan/ *>12 months*	Jumlah/ *Total*	
Liabilitas							***Liabilities***
Liabilitas segera	190.751	-	-	-	-	190.751	*Liabilities due immediately*
Simpanan nasabah	8.427.363	2.851.639	1.070.204	714.586	-	13.063.792	*Deposits from customers*
Simpanan dari bank lain	111.479	15.600	2.000	-	-	129.079	*Deposits from other banks*
Liabilitas sewa	-	29.643	-	-	50.760	80.403	*Lease liabilities*
Liabilitas lain-lain**)	258.992	53.592	16.810	13.925	1.971	345.290	*Other liabilities***)*
Jumlah	**8.988.585**	**2.950.474**	**1.089.014**	**728.511**	**52.731**	**13.809.315**	***Total***
Perbedaan jatuh tempo	**(2.494.385)**	**111.977**	**867.034**	**1.216.619**	**3.985.544**	**3.686.789**	***Maturity gap***

*) Aset lain-lain terdiri dari tagihan terkait pembayaran kredit *channeling* dan *direct*, piutang asuransi, tagihan gerbang pembayaran, piutang bunga, tagihan ATM Bersama, Alto dan Prima, setoran jaminan dan tagihan lain.

**) Liabilitas lain-lain terdiri dari cadangan biaya umum, titipan nasabah, beban yang masih harus dibayar, pendapatan diterima dimuka, bonus, biaya layanan dan komisi kredit yang masih harus dibayar, biaya asuransi kredit yang masih harus dibayar, angsuran kredit diterima dimuka dan lainnya.

*) *Other assets consist of receivables related to channeling and direct loans repayment, insurance receivables, receivables from payment gateway, interest receivables, receivables from ATM Bersama, Alto and Prima, guarantee deposit and other receivables.*

**) *Other liabilities consist of general accrued expenses, deposits from customers, accrued expenses, advances payable, bonus, accrued loan service fees and commissions, accrued loan insurance expenses, loan installments received in advance and others.*

Tabel jatuh tempo berikut ini menyajikan informasi mengenai perkiraan jatuh tempo dari liabilitas keuangan sesuai arus kas kontraktual yang tidak didiskontokan dengan menggunakan suku bunga efektif rata-rata selama tahun berjalan pada tanggal 31 Desember 2025 dan 2024:

The maturity tables below provide information about maturities on contractual undiscounted cash flows of financial liabilities using average effective interest rate during the year as of December 31, 2025 and 2024:

31 Desember 2025/*December 31, 2025*

	< 1 bulan/ *< 1 month*	>1-3 bulan/ *>1-3 months*	>3-6 bulan/ *>3-6 months*	>6-12 bulan/ *>6-12 months*	>12 bulan/ *>12 months*	Jumlah/*Total*	
Liabilitas							***Liabilities***
Liabilitas segera	223.467	-	-	-	-	223.467	*Liabilities due immediately*
Simpanan nasabah	9.015.393	3.181.385	1.097.267	902.945	-	14.196.990	*Deposits from customers*
Simpanan dari bank lain	37.788	11.126	17.783	6.340	-	73.037	*Deposits from other banks*
Liabilitas sewa	-	8.141	4.305	10.735	30.989	54.170	*Lease liabilities*
Liabilitas lain-lain**)	239.905	45.154	16.067	12.730	2.103	315.959	*Other liabilities***)*
Jumlah	**9.516.553**	**3.245.806**	**1.135.422**	**932.750**	**33.092**	**14.863.623**	***Total***

31 Desember 2024/*December 31, 2024*

	< 1 bulan/ *< 1 month*	>1-3 bulan/ *>1-3 months*	>3-6 bulan/ *>3-6 months*	>6-12 bulan/ *>6-12 months*	>12 bulan/ *>12 months*	Jumlah/*Total*	
Liabilitas							***Liabilities***
Liabilitas segera	190.751	-	-	-	-	190.751	*Liabilities due immediately*
Simpanan nasabah	8.457.372	2.898.328	1.105.248	762.035	-	13.222.983	*Deposits from customers*
Simpanan dari bank lain	112.072	15.856	2.066	-	-	129.994	*Deposits from other banks*
Liabilitas sewa	-	30.040	-	-	64.547	94.587	*Lease liabilities*
Liabilitas lain-lain**)	258.992	53.592	16.810	13.925	1.971	345.290	*Other liabilities***)*
Jumlah	**9.019.187**	**2.997.816**	**1.124.124**	**775.960**	**66.518**	**13.983.605**	***Total***

**) Liabilitas lain-lain terdiri dari cadangan biaya umum, titipan nasabah, beban yang masih harus dibayar, pendapatan diterima dimuka, bonus, biaya layanan dan komisi kredit yang masih harus dibayar, biaya asuransi kredit yang masih harus dibayar, angsuran kredit diterima dimuka dan lainnya.

***) *Other liabilities consist of general accrued expenses, deposits from customers, accrued expenses, advances payable, bonus, accrued loan service fees and commissions, accrued loan insurance expenses, loan installments received in advance and others.*

40. 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 serta untuk memenuhi ketentuan kecukupan permodalan yang ditetapkan oleh regulator serta memastikan agar struktur permodalan Bank telah efisien.

Bank menyusun Rencana Permodalan berdasarkan penilaian dan 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 yang dapat ditoleransi melalui proses perencanaan modal, begitu pula dengan bisnis yang disesuaikan dengan tingkat permodalan dan persyaratan likuiditas Bank.

Kebutuhan permodalan Bank juga direncanakan dan didiskusikan secara rutin yang didukung dengan data-data analisis. Rencana Permodalan disusun oleh Direksi sebagai bagian dan Rencana Bisnis Bank dan disetujui oleh Dewan Komisaris. Perencanaan ini diharapkan akan memastikan tersedianya modal yang cukup dan terciptanya struktur permodalan yang kuat guna mendukung pertumbuhan bisnis ke depan.

Otoritas Jasa Keuangan (OJK) menentukan dan mengawasi kebutuhan modal Bank. Bank diwajibkan untuk mentaati peraturan yang berlaku dalam hal ini modal yang diwajibkan regulator. Pendekatan Bank terhadap pengelolaan modal ditentukan oleh strategi dan persyaratan organisasi Bank, dengan memperhitungkan peraturan, serta keadaan ekonomi dan komersial.

40. 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 regulatory capital adequacy requirements and also to ensure the efficiency of the 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 which can be tolerated by the appetite through the capital planning process method as well as assess the businesses based on the Bank's capital and liquidity requirements.

The capital needs of the Bank are also planned and discussed on a routine basis supported by data analysis. Capital Planning is prepared by the Board of 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 strong mix of the different components of capital are maintained to support business growth in the future.

Financial Services Authority (FSA) sets and monitors capital requirements for the Bank. The Bank is required to comply with prevailing regulation in respect of regulatory capital. The Bank's approach to capital management is driven by the Bank's strategic and organisational requirements, taking into account regulatory, economic and commercial.

41. LABA PER SAHAM

Laba tahun berjalan per saham dasar dihitung dengan membagi laba tahun berjalan dengan rata-rata tertimbang jumlah lembar saham biasa yang beredar pada tahun bersangkutan.

41. PROFIT PER SHARE

Basic earnings loss per share for the year is computed by dividing earnings for the year by the weighted average number of shares of outstanding common stock during the related year.

	Tahun yang Berakhir pada tanggal 31 Desember/ *Year ended December 31,*		
	2025	**2024**	
Laba bersih tahun berjalan	565.690	19.885	*Earnings for the current year*
Rata-rata tertimbang total saham	13.350	12.585	*Weighted average number of shares*
Laba per saham dasar dan dilusian (dalam Rupiah penuh)	42,37	1,58	*Basic and diluted earnings per share (in Rupiah full amount)*

42. TAMBAHAN INFORMASI ARUS KAS

Perubahan pada liabilitas yang timbul dari aktivitas pendanaan pada laporan arus kas adalah sebagai berikut:

	1 Januari 2025/ *January 1, 2025*	Arus kas/ *Cash flows*	Non-kas/ *Non-cash*	31 Desember 2025/ *December 31, 2025*	
Liabilitas sewa	80.403	(37.560)	6.886	49.729	*Lease liabilities*

	1 Januari 2024/ *January 1, 2024*	Arus kas/ *Cash flows*	Non-kas/ *Non-cash*	31 Desember 2024/ *December 31, 2024*	
Liabilitas sewa	52.821	(45.742)	73.324	80.403	*Lease liabilities*

43. STANDAR AKUNTANSI YANG TELAH DITERBITKAN NAMUN BELUM BERLAKU EFEKTIF

Amendemen dan penyesuaian Pernyataan Standar Akuntansi Keuangan (PSAK) dan Interpretasi Standar Akuntansi Keuangan (ISAK) yang telah disahkan oleh Dewan Standar Akuntansi Keuangan (DSAK) - Ikatan Akuntan Indonesia (IAI), tetapi belum berlaku efektif untuk laporan keuangan tahun berjalan diungkapkan di bawah 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 30 Maret 2026:

Mulai efektif pada atau setelah tanggal 1 Januari 2026

a. PSAK 109: “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 terkait dengan kontraktual seperti *tranche*.

b. Amandemen PSAK 107: “Instrumen Keuangan: Pengungkapan tentang Klasifikasi dan Pengkuruan Instrumen Keuangan”

   Amandemen ini mengubah ketentuan dalam PSAK 107 terkait persyaratan pengungkapan investasi pada instrumen ekuitas yang diukur pada nilai wajar melalui penghasilan komprehensif lain dan menambah ketentuan terkait instrumen keuangan dengan persyaratan kontraktual yang mengubah waktu atau jumlah arus kas kontraktual.

43. ACCOUNTING STANDARDS ISSUED BUT NOT YET EFFECTIVE

Amendments and improvements to the Statements of Financial Accounting Standards (SFAS) and Interpretations of Financial Accounting Standards (IFAS) that have been issued by the Financial Accounting Standards Board (FASB) of the Indonesian Institute of Accountants (IAI), but are not yet effective for the current financial year, 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 March 30, 2026:

Effective beginning on or after January 1, 2026

a. SFAS 109: “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.

b. Amendments to SFAS 107: “Financial Instruments: Disclosures about the Classification and Measurement of Financial Instruments”

   The amendments 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 statement related to financial instruments with contractual terms that alter the timing or amount of contractual cash flows.

43. STANDAR AKUNTANSI YANG TELAH DITERBITKAN NAMUN BELUM BERLAKU EFEKTIF (lanjutan)

Mulai efektif pada atau setelah tanggal 1 Januari 2027

a. PSAK 118: "Penyajian dan Pengungkapan dalam Laporan Keuangan"

PSAK 118 akan menggantikan PSAK 201 "Penyajian Laporan Keuangan" yang meskipun mempertahankan banyak prinsip yang ada tetapi secara signifikan mengubah cara Bank dalam melaporkan laporan laba rugi. PSAK ini 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, PSAK ini juga mengatur mengenai pengungkapan ukuran kinerja tetapan manajemen (UKTM) dengan tujuan mengomunikasikan pandangan manajemen atas aspek kinerja keuangan Bank secara keseluruhan.

Pada saat penerbitan laporan keuangan, Bank masih mempelajari dampak yang mungkin timbul dari penerapan standar revisi tersebut serta pengaruhnya pada laporan keuangan Bank.

43. ACCOUNTING STANDARDS ISSUED BUT NOT YET EFFECTIVE (continued)

Effective beginning on or after January 1, 2027

a. SFAS 118: "Presentation and Disclosure in Financial Statements"

SFAS 118 will replace SFAS 201 "Presentation in Financial Statements" which retain many existing principles but significantly change how Bank report income statement. This SFAS 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 SFAS 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 Bank.

As at the authorization date of this financial statements, the Bank is still evaluating the potential impact of these revise standards to the Bank's financial statements.

44. INFORMASI TAMBAHAN

Informasi tambahan berikut merupakan informasi yang tidak dipersyaratkan oleh Standar Akuntansi Keuangan di Indonesia. Informasi tersebut disusun sesuai dengan regulasi Otoritas Jasa Keuangan.

44. ADDITIONAL INFORMATION

The following additional information is not required by Indonesian Financial Accounting Standards. Such additional information was prepared in accordance with regulation of Financial Service Authority.

GIRO PADA BANK INDONESIA

Bank dipersyaratkan untuk memiliki Giro Wajib Minimum (GWM) dalam mata uang Rupiah dalam kegiatannya sebagai bank umum sebagai berikut:

CURRENT ACCOUNTS WITH BANK INDONESIA

The Bank is required to maintain Minimum Reserve Requirement (MRR) in Rupiah currency in its activities as a commercial bank as follow:

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Rupiah			*Rupiah*
GWM	9,00%	9,00%	*MRR*
Harian	0,00%	0,00%	*Daily*
Rata-rata	9,00%	9,00%	*Average*
Penyangga likuiditas makroprudensial (PLM)	4,00%	5,00%	*Macroprudential liquidity buffer (MLB)*

44. INFORMASI TAMBAHAN (lanjutan)

GIRO PADA BANK INDONESIA (lanjutan)

Pada tanggal-tanggal 31 Desember 2025 dan 2024, berdasarkan Peraturan Bank Indonesia (PBI) No. 24/4/PBI/2022 tanggal 1 Juli 2022 tentang perubahan keempat atas PBI No. 20/3/PBI/2018 dan PBI No. 11 Tahun 2023 yang berlaku tanggal 1 Oktober 2023 menggantikan PBI No. 24/5/PBI/2022 tentang Kebijakan Insentif Likuiditas Makroprudensial, serta Peraturan Anggota Dewan Gubernur ("PADG") No. 12 Tahun 2023 yang berlaku tanggal 27 September 2023 menggantikan PADG No. 2 Tahun 2023 tentang Peraturan Pelaksanaan Pemenuhan Giro Wajib Minimum dalam Rupiah dan Valuta Asing Bagi Bank dan PADG Nomor 4 tahun 2024 tentang perubahan atas PADG Nomor 11 tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial yang berlaku mulai 1 Juni 2024 Umum Konvensional, Bank Umum Syariah dan Unit Usaha Syariah, serta PADG Nomor 4 tahun 2024 tentang perubahan atas PADG Nomor 11 tahun 2023 tentang Peraturan Pelaksanaan Kebijakan Insentif Likuiditas Makroprudensial yang berlaku mulai 1 Juni 2024. GWM dalam Rupiah bagi Bank Umum Konvensional (BUK) ditetapkan berdasarkan dana pihak ketiga (DPK) dalam Rupiah selama periode laporan tertentu yang wajib dipenuhi dengan ketentuan sebagai berikut:
a) Secara harian sebesar 0,00%
b) Secara rata-rata sebesar 9,00%

Berdasarkan surat dari BI No. 27/250/DKMP/Srt/B tanggal 12 Desember 2025, Bank memperoleh insentif remunerasi sebesar 1,20% berlaku dari tanggal 16 Desember sampai dengan 31 Desember 2025, sehingga GWM rata-rata yang harus dipenuhi Bank pada tanggal 31 Desember 2025 adalah sebesar 7,8%.

Berdasarkan surat dari BI No. 26/201/DKMP/Srt/B tanggal 2 Desember 2024, Bank memperoleh insentif remunerasi sebesar 3,00% berlaku dari 1 sampai dengan 31 Desember 2024, sehingga GWM rata-rata yang harus dipenuhi Bank pada tanggal 31 Desember 2024 adalah sebesar 6,00%.

Giro PLM adalah cadangan minimum yang wajib dipelihara oleh Bank berupa Rupiah dalam bentuk surat berharga dengan komponen surat berharga berupa Surat Berharga Negara (SBN) dan Sekuritas Rupiah Bank Indonesia (SRBI).

44. ADDITIONAL INFORMATION (continued)

CURRENT ACCOUNTS WITH BANK INDONESIA (continued)

As of Desember 31, 2025 and 2024, based on Bank Indonesia Regulation (PBI) No. 24/4/PBI/2022 dated July 1, 2022 concerning the fourth amendment to the PBI No. 20/3/PBI/2018 and PBI No. 11 year 2023 which came into effect on October 1, 2023 replacing PBI No. 24/5/PBI/2022 concerning Macroprudential Liquidity Incentive Policy, as well as Regulation of Members of the Board of Governors ("PADG") No. 12 year 2023 which came into effect on September 27, 2023 replacing PADG No. 2 year 2023 concerning Implementing Regulations for The Fulfillment of Minimum Reserve Requirement in Rupiah and Foreign Exchange for Conventional and PADG Number 4 of 2024 concerning amendments to PADG Number 11 of 2023 concerning Regulations for the Implementation of Macroprudential Liquidity Incentive Policies effective from June 1, 2024 Commercial Banks, Sharia Commercial Banks and Sharia Business Units, as well PADG Number 4 of 2024 concerning amendments to PADG Number 11 of 2023 concerning Regulations for the Implementation of Macroprudential Liquidity Incentive Policies effective from June 1, 2024. MRR in Rupiah for Conventional Commercial Banks (BUK) is determined based on third party funds (DPK) in Rupiah during certain reporting periods which must be fulfilled with the following conditions:
a) On a daily basis of 0.00%
b) On average by 9.00%

Based on letter from BI No. 27/250/DKMP/Srt/B *dated December 12, 2025, the Bank obtained remuneration incentive of 1.20% valid from dated December 16, until December 31, 2025, therefore the average MRR that should be fulfilled by the Bank as of December 31, 2025 is 7.8%.*

Based on letter from BI No. 26/201/DKMP/Srt/B dated December 2, 2024, the Bank obtained remuneration incentive of 3.00% valid from December 1, until December 31, 2024, therefore the average MRR that should be fulfilled by the Bank as of December 31, 2024 is 6.00%.

MLB demand deposits are minimum reserves that must be maintained by banks in the form of Rupiah in the form of securities with securities components in the form of Goverment Securities (SBN), and Bank Indonesia Rupiah Securities (SRBI).

44. INFORMASI TAMBAHAN (lanjutan)

GIRO PADA BANK INDONESIA (lanjutan)

Kewajiban pemenuhan PLM diatur melalui Peraturan Bank Indonesia No. 23/17/PBI/2021 perubahan ketiga atas Peraturan Bank Indonesia No. 20/4/PBI/2018 dan Peraturan Bank Indonesia No. 24/3/PBI/2022 tentang Perubahan atas Peraturan Bank Indonesia No. 23/13/PBI/2021 tentang Rasio Pembiayaan Inklusif Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah serta PADG No. 18 Tahun 2023 yang berlaku 1 Desember 2023 Perubahan Ketujuh Atas PADG No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial ("RIM") dan Penyangga Likuiditas Makroprudensial ("PLM") Bagi Bank Umum Konvensional, dan Peraturan Anggota Dewan Gubernur Nomor 11 Tahun 2025 tentang Perubahan Kedelapan atas Peraturan Anggota Dewan Gubernur Nomor 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah, di mana besaran Giro PLM pada 31 Desember 2025 menjadi sebesar 4% (empat persen) dan Giro PLM pada 31 Desember 2024 sebesar 5% (lima persen).

Giro RIM adalah tambahan simpanan minimum yang wajib dipelihara oleh Bank dalam bentuk saldo rekening giro pada Bank Indonesia.

Rasio Intermediasi Makroprudensial (RIM) dahulu disebut sebagai *Loan to Funding Ratio* (*LFR*). Berdasarkan PBI No. 20/4/PBI/2018 tanggal 29 Maret 2018, PBI No. 21/12/PBI/2019 dan perubahan terakhir melalui PADG No. 23/7/PADG/2021 tanggal 26 April 2021 yang merupakan perubahan ketiga atas No. 21/22/PADG/2019 tentang Rasio Intermediasi Makroprudensial dan Penyangga Likuiditas Makroprudensial bagi Bank Umum Konvensional, Bank Umum Syariah, dan Unit Usaha Syariah yang menyatakan bahwa 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%
4. Parameter disinsentif sebesar 0,15

Pada tanggal 31 Desember 2025 dan 2024, Bank berkewajiban untuk melakukan pemenuhan giro RIM masing-masing sebesar 4,52% % dan 2,83%.

44. ADDITIONAL INFORMATION (continued)

CURRENT ACCOUNTS WITH BANK INDONESIA (continued)

The requirement to fulfill MLB is stipulated through PBI No. 23/17/PBI/2021 third amendment to Bank Indonesia Regulation No. 20/4/PBI/2018 and Bank Indonesia Regulation No. 24/3/PBI/2022 concerning Amendments to Bank Indonesia Regulation No. 23/13/PBI/2021 concerning Macroprudential Inclusive Financing Ratios for Conventional Commercial Banks, Sharia Commercial Banks, and Sharia Business Units as well as PADG No. 18 year 2023 which takes effect December 1, 2023 Seventh Amendment to PADG No. 21/22/PADG/2019 concerning the Macroprudential Intermediation Ratio ("RIM") and Macroprudential Liquidity Buffer ("MLB") for Conventional Commercial Banks, and Amendment to PADG No. 11 year 2025 concering eighth amandement to PADG 21/22/PADG/2019 concerning the Macroprudential Intermediation Ratio ("RIM") and Macroprudential Liquidity Buffer ("MLB") for Conventional Commercial Banks, Sharia Commercial Banks and Sharia Business Units where the amount of PLM Demand Deposits in December 31, 2025 will be 4% (four percent) and amount of PLM Demand Deposits December 31, 2024 will be 5% (five percent) of BUK DPK in Rupiah.

RIM demand deposits is the additional reserve that should be maintained by the Bank in the form of current accounts with Bank Indonesia.

The Macroprudential Intermediate Ratio (MIR) is formerly referred to as the Loan to Funding Ratio (LFR). Based on PBI No. 20/4/PBI/2018 dated March 29, 2018, PBI No. 21/12/PBI/2019 and the last amendment through PADG No. 23/7/PADG/2021 dated April 26, 2021 which is the third amendment to No. 21/22/PADG/2019 concerning Macroprudential Intermediation Ratio and Macroprudential Liquidity Buffer for Conventional Commercial Banks, Islamic Commercial Banks, and Islamic Business Units, it states that the parameters used in fulfilling RIM current accounts are as follows:

1. RIM's target lower limit is 84%
2. RIM's upper limit is 94%
3. Incentive KPMM of 14%
4. The disincentive parameter is 0.15

As of December 31, 2025 and 2024, the Bank is obliged to fulfill the Current Account RIM of 4.52% and 2.83%, respectively.

44. INFORMASI TAMBAHAN (lanjutan) / *44. ADDITIONAL INFORMATION (continued)*

GIRO PADA BANK INDONESIA (lanjutan) / *CURRENT ACCOUNTS WITH BANK INDONESIA (continued)*

Rasio GWM pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar:

MRR ratios as of December 31, 2025 and 2024 are as follows:

	31 Desember 2025/ *December 31, 2025*	31 Desember 2024/ *December 31, 2024*	
Rupiah			*Rupiah*
GWM	8,62%	6,14%	*MRR*
Harian	0,00%	0,00%	*Daily*
Rata-rata	8,62%	6,14%	*Average*
Penyangga likuiditas makroprudensial (PLM)	47,94%	32,09%	*Macroprudential liquidity buffer (MLB)*

Bank telah memenuhi peraturan yang berlaku tentang GWM Bank Umum Konvensional pada 31 Desember 2025 dan 2024.

The Bank has fulfilled the prevailing regulation regarding MRR for Conventional Banks as of December 31, 2025 and 2024.

GIRO PADA BANK LAIN / *CURRENT ACCOUNTS WITH OTHER BANKS*

Seluruh giro pada bank lain pada tanggal 31 Desember 2025 dan 2024 masing-masing diklasifikasikan lancar.

All current accounts with other banks as of December 31, 2025 and 2024 were classified as current.

PENEMPATAN PADA BANK INDONESIA DAN BANK LAIN / *PLACEMENTS WITH BANK INDONESIA AND OTHER BANKS*

Seluruh penempatan pada Bank Indonesia dan bank lain pada tanggal 31 Desember 2025 dan 2024 masing-masing diklasifikasikan lancar.

All placements with Bank Indonesia and other banks as of December 31, 2025 and 2024 were classified as current.

EFEK-EFEK / *MARKETABLE SECURITIES*

Pada tanggal 31 Desember 2025 dan 2024, seluruh efek-efek masing-masing digolongkan sebagai lancar.

As of December 31, 2025 and 2024, all marketable securities are classified as current, respectively.

EFEK-EFEK YANG DIBELI DENGAN JANJI DIJUAL KEMBALI / *SECURITIES PURCHASED UNDER AGREEMENTS TO RESELL*

Pada tanggal 31 Desember 2025 dan 2024, seluruh efek-efek yang dibeli dengan janji dijual kembali masing-masing digolongkan sebagai lancar.

As of December 31, 2025 and 2024, all securities purchased under agreements to resell are classified as current, respectively.

44. INFORMASI TAMBAHAN (lanjutan) / *44. ADDITIONAL INFORMATION (continued)*

KREDIT YANG DIBERIKAN / *LOANS*

Kredit yang diberikan yang diklasifikasikan berdasarkan jenis dan sektor ekonomi terdiri dari:

Loans classified based on the type and economic sector consists of the following:

1. Berdasarkan jenis / *1. By type*

31 Desember 2025/*December 31, 2025*

	Lancar/ *Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Konsumsi	4.767.860	671.841	110.641	18.972	2.444	5.571.758	*Consumption*
Modal kerja	1.227.115	12.369	95.447	336	29.245	1.364.512	*Working capital*
Pinjaman rekening koran	47.690	-	-	-	-	47.690	*Demand loan*
Karyawan	8.415	157	-	-	-	8.572	*Employees*
Investasi	190.048	-	-	-	-	190.048	*Investment*
Sub jumlah	**6.241.128**	**684.367**	**206.088**	**19.308**	**31.689**	**7.182.580**	***Sub total***
Cadangan kerugian penurunan nilai	(158.144)	(163.455)	(146.713)	(15.055)	(31.689)	(515.056)	*Allowance for impairment losses*
Jumlah	**6.082.984**	**520.912**	**59.375**	**4.253**	**-**	**6.667.524**	***Total***

31 Desember 2024/*December 31, 2024*

	Lancar/ *Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Konsumsi	5.194.813	796.708	64.227	25.290	127.439	6.208.477	*Consumption*
Modal kerja	2.448.263	38.306	2.777	4.308	65.193	2.558.847	*Working capital*
Pinjaman rekening koran	37.957	-	-	-	1.499	39.456	*Demand loan*
Karyawan	14.674	138	-	-	360	15.172	*Employees*
Investasi	-	-	-	-	194	194	*Investment*
Sub jumlah	**7.695.707**	**835.152**	**67.004**	**29.598**	**194.685**	**8.822.146**	***Sub total***
Cadangan kerugian penurunan nilai	(149.671)	(220.427)	(45.618)	(24.844)	(194.685)	(635.245)	*Allowance for impairment losses*
Jumlah	**7.546.036**	**614.725**	**21.386**	**4.754**	**-**	**8.186.901**	***Total***

2. Berdasarkan sektor ekonomi / *2. By economic sector*

31 Desember 2025/*December 31, 2025*

	Lancar/ *Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Rumah tangga	4.787.999	674.277	110.506	19.143	2.925	5.594.850	*Household*
Industri pengolahan	82.134	-	-	-	-	82.134	*Manufacturing*
Jasa masyarakat, sosial budaya, hiburan dan perorangan lainnya	444.615	14	-	-	-	444.629	*Community services, social culture, entertainment and other individuals*
Real estate, usaha persewaan dan jasa perusahaan	273.304	-	-	-	-	273.304	*Real estate, leasing and corporate service*
Perdagangan besar dan eceran	428.502	10.076	582	165	28.764	468.089	*Wholesale and retail trade*
Pertambangan	224.574	-	95.000	-	-	319.574	*Mining*
Sub jumlah	**6.241.128**	**684.367**	**206.088**	**19.308**	**31.689**	**7.182.580**	***Sub total***
Cadangan kerugian penurunan nilai	(158.144)	(163.455)	(146.713)	(15.055)	(31.689)	(515.056)	*Allowance for impairment losses*
Jumlah	**6.082.984**	**520.912**	**59.375**	**4.253**	**-**	**6.667.524**	***Total***

31 Desember 2024/*December 31, 2024*

	Lancar/ *Current*	Dalam perhatian khusus/ *Special mention*	Kurang lancar/ *Substandard*	Diragukan/ *Doubtful*	Macet/*Loss*	Jumlah/*Total*	
Rumah tangga	5.209.500	796.846	64.227	25.290	127.799	6.223.662	*Household*
Industri pengolahan	910.086	-	-	-	-	910.086	*Manufacturing*
Jasa masyarakat, sosial budaya, hiburan dan perorangan lainnya	701.193	3	-	-	930	702.126	*Community services, social culture, entertainment and other individuals*
Real estate, usaha persewaan dan jasa perusahaan	675.666	-	-	-	-	675.666	*Real estate, leasing and corporate service*
Perdagangan besar dan eceran	64.805	38.303	2.777	4.308	21.756	131.949	*Wholesale and retail trade*
Pertanian, perburuan dan kehutanan	100.000	-	-	-	-	100.000	*Agriculture, hunting and forestry*
Konstruksi	-	-	-	-	44.200	44.200	*Construction*
Pertambangan	34.457	-	-	-	-	34.457	*Mining*
Sub jumlah	**7.695.707**	**835.152**	**67.004**	**29.598**	**194.685**	**8.822.146**	***Sub total***
Cadangan kerugian penurunan nilai	(149.671)	(220.427)	(45.618)	(24.844)	(194.685)	(635.245)	*Allowance for impairment losses*
Jumlah	**7.546.036**	**614.725**	**21.386**	**4.754**	**-**	**8.186.901**	***Total***

44. INFORMASI TAMBAHAN (lanjutan)

44. ADDITIONAL INFORMATION (continued)

KREDIT YANG DIBERIKAN (lanjutan)

LOANS (continued)

3. Berdasarkan kolektibilitas Bank Indonesia dan penyisihan penilaian kualitas aset sesuai ketentuan POJK

3. By Bank Indonesia collectibility and asset quality allowances based on POJK

Informasi berikut menunjukan kredit yang diberikan berdasarkan kolektibilitas Bank Indonesia dan penyisihan penilaian kualitas aset sesuai ketentuan POJK (setelah dikurangi nilai agunan yang dapat diperhitungkan), masing-masing untuk tanggal, 31 Desember 2025 dan 2024.

The following information loans are based on Bank Indonesia collectibility and assets quality allowances as per POJK (after deducted with allowable collateral value) as of December 31, 2025 and 2024, respectively.

	31 Desember 2025/*December 31, 2025*		
	Pokok/ *Principal*	**Penyisihan penilaian kualitas aset sesuai ketentuan POJK/ *Assets quality allowances based on POJK***	
Lancar	6.241.128	(64.120)	*Current*
Dalam perhatian khusus	684.367	(32.112)	*Special mention*
Kurang lancar	206.088	(12.532)	*Substandard*
Diragukan	19.308	(14.807)	*Doubtful*
Macet	31.689	(33.231)	*Loss*
Jumlah	**7.182.580**	**(156.802)**	***Total***

	31 Desember 2024/*December 31, 2024*		
	Pokok/ *Principal*	**Penyisihan penilaian kualitas aset sesuai ketentuan POJK/ *Assets quality allowances based on POJK***	
Lancar	7.695.707	(75.603)	*Current*
Dalam perhatian khusus	835.152	(40.329)	*Special mention*
Kurang lancar	67.004	(10.051)	*Substandard*
Diragukan	29.598	(14.799)	*Doubtful*
Macet	194.685	(157.052)	*Loss*
Jumlah	**8.822.146**	**(297.834)**	***Total***

Rasio jumlah cadangan kerugian kredit yang diberikan yang telah dibentuk terhadap penyisihan penilaian kualitas kredit sesuai ketentuan POJK (setelah dikurangi nilai agunan yang dapat diperhitungkan) pada tanggal 31 Desember 2025 dan 2024 adalah masing-masing sebesar 328,48% dan 213,29%.

Ratios of allowance for impairment losses on loans to allowances of assets quality based on POJK (after deducted with allowable collateral value) as of December 31, 2025 and 2024 are 328.48% and 213.29%, respectively.

Rasio kredit bermasalah (NPL) secara bruto (sebelum dikurangi cadangan kerugian penurunan nilai) dan secara neto (setelah dikurangi cadangan kerugian penurunan nilai) pada tanggal 31 Desember 2025 dan 2024 masing-masing sebagai berikut:

The non-performing loans (NPL) ratios on a gross basis (before deducting the allowance for impairment losses) and net basis (after deduction the allowance for impairment losses) as of December 31, 2025 and 2024 were as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
NPL rasio bruto	3,58%	3,30%	*NPL gross*
NPL rasio neto	0,89%	0,30%	*NPL net*

44. INFORMASI TAMBAHAN (lanjutan)

44. ADDITIONAL INFORMATION (continued)

KREDIT YANG DIBERIKAN (lanjutan)

LOANS (continued)

4. Kredit yang direstrukturisasi

4. Restructured loans

Berikut ini adalah jenis dan jumlah kredit yang telah direstrukturisasi per 31 Desember 2025 dan 2024:

Below are the type and amount of restructured loans as of December 31, 2025 and 2024:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Perpanjangan jangka waktu dan penurunan suku bunga kredit	237	65.581	*Extension of loan maturity dates and reduction of interest rates*

Berikut ini adalah kolektibilitas kredit yang telah direstrukturisasi per 31 Desember 2025 dan 2024:

Below are the collectibility of restructured loans as of December 31, 2025 and 2024:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Lancar	237	328	*Current*
Dalam perhatian khusus	-	-	*Special mention*
Kurang lancar	-	84	*Substandard*
Diragukan	-	69	*Doubtful*
Macet	-	65.100	*Loss*
Jumlah	**237**	**65.581**	***Total***

Jumlah kredit yang telah direstrukturisasi dan berada dalam kategori kredit bermasalah pada tanggal 31 Desember 2025 dan 2024, masing-masing sebesar RpNihil dan Rp65.253.

Restructured loans and categorized as non-performing loans as of December 31, 2025 and 2024 are amounting to RpNil and Rp65,253, respectively.

Sehubungan dengan restrukturisasi dan relaksasi kredit sebagai dampak dari COVID-19, OJK telah mengeluarkan POJK No. 17/POJK.03/2021 tanggal 15 September 2021 tentang perubahan kedua atas POJK No. 11/POJK.03/2020 tentang Stimulus Perekonomian Nasional Sebagai Kebijakan *Countercyclical* Dampak Penyebaran COVID-19 yang telah berakhir pada 31 Maret 2023. Baki debet kredit yang telah direstrukturisasi sebagai akibat pandemi COVID-19 pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar RpNihil dan Rp64.922.

In relation to loans restructuring and relaxation due to COVID-19 impact, FSA has issued POJK No. 17/POJK.03/2021 dated September 15, 2021 regarding second amendment to POJK No.11/POJK.03/2020 regarding National Economic Stimulus as the COVID-19 Outbreak Impact Countercyclical Policy has been ended for March 31, 2023. The loans outstanding that have been restructured as a result of COVID-19 pandemic as of December 31, 2025 and 2024 are amounting to RpNil and Rp64,922, respectively.

44. INFORMASI TAMBAHAN (lanjutan)

44. ADDITIONAL INFORMATION (continued)

KREDIT YANG DIBERIKAN (lanjutan)

LOANS (continued)

5. Kredit bermasalah

5. Non-performing loans

Pada tanggal 31 Desember 2025 dan 2024, kredit bermasalah yang diberikan Bank (sesuai dengan peraturan OJK/Bank Indonesia) serta cadangan kerugian penurunan nilainya berdasarkan sektor ekonomi adalah sebagai berikut:

As of December 31, 2025 and 2024 the Bank's non-performing loans (based on prevailing FSA/Bank Indonesia regulations) and the allowance for impairment losses by economic sector were as follows:

	31 Desember 2024/*December 31, 2025*				
	Kurang lancar/ *Substandard*	**Diragukan/ *Doubtful***	***Macet/Loss***	**Jumlah/*Total***	
Rumah tangga	110.506	19.143	2.924	132.573	*Household*
Perdagangan besar dan eceran	582	165	28.765	29.512	*Wholesale and retail trade*
Jasa masyarakat, sosial budaya, hiburan dan perorangan lainnya	-	-	-	-	*Community services, social culture, entertainment and other individuals*
Pertambangan	95.000	-	-	95.000	*Mining*
Sub jumlah	**206.088**	**19.308**	**31.689**	**257.085**	***Sub total***
Cadangan kerugian penurunan nilai	(146.713)	(15.055)	(31.689)	(193.457)	*Allowance for impairment losses*
Jumlah	**59.375**	**4.253**	**-**	**63.628**	***Total***

	31 Desember 2024/*December 31, 2024*				
	Kurang lancar/ *Substandard*	**Diragukan/ *Doubtful***	***Macet/Loss***	**Jumlah/*Total***	
Rumah tangga	64.227	25.290	127.799	217.316	*Household*
Konstruksi	-	-	44.200	44.200	*Construction*
Perdagangan besar dan eceran	2.777	4.308	21.756	28.841	*Wholesale and retail trade*
Jasa masyarakat, sosial budaya, hiburan dan perorangan lainnya	-	-	930	930	*Community services, social culture, entertainment and other individuals*
Sub jumlah	**67.004**	**29.598**	**194.685**	**291.287**	***Sub total***
Cadangan kerugian penurunan nilai	(45.618)	(24.844)	(194.685)	(265.147)	*Allowance for impairment losses*
Jumlah	**21.386**	**4.754**	**-**	**26.140**	***Total***

Kredit yang telah dihapusbukukan oleh Bank dicatat sebagai kredit ekstra-komtabel di dalam rekening administratif.

The loans written off by the Bank are recorded as extra-comptable in the administrative account.

44. INFORMASI TAMBAHAN (lanjutan)

KREDIT YANG DIBERIKAN (lanjutan)

6. Informasi pokok lainnya sehubungan dengan kredit yang diberikan

a. Pada tanggal 31 Desember 2025 dan 2024, Bank telah memenuhi ketentuan Batas Maksimum Pemberian Kredit (BMPK) baik untuk pihak berelasi maupun untuk pihak ketiga.

b. Rasio kredit yang diberikan kepada Usaha Mikro Kecil dan Menengah (UMKM) terhadap jumlah kredit yang diberikan pada tanggal 31 Desember 2025 dan 2024 masing-masing sebesar 0,73% dan 1,00%.

KOMITMEN DAN KONTINJENSI

Berikut ini merupakan informasi atas fasilitas kredit kepada debitur yang belum digunakan berdasarkan kolektibilitas Bank Indonesia dan penyisihan penilaian kualitas aset sesuai ketentuan POJK masing-masing pada tanggal 31 Desember 2025 dan 2024.

44. ADDITIONAL INFORMATION (continued)

LOANS (continued)

6. Other significant information relating to loans

a. As of December 31, 2025 and 2024, the Bank has complied with Legal Lending Limit (LLL) requirements for both related parties and third parties.

b. Ratios of loans extended to Micro, Small, Medium Enterprise (UMKM) to total loans as of December 31, 2025 and 2024 were 0.73% and 1.00%, respectively.

COMMITMENTS AND CONTINGENCIES

Below is the information of unused loan facilities to debtors based on Bank Indonesia's collectibility and allowance of assets quality per POJK as of December 31, 2025 and 2024, respectively.

	31 Desember 2025/*December 31, 2025*			
	Pokok/ ***Principal***	**Cadangan kerugian penurunan nilai/** ***Allowances for impairment losses***	**Penyisihan penilaian kualitas aset sesuai ketentuan POJK/** ***Assets quality allowances based on POJK***	
Fasilitas kredit kepada debitur yang belum digunakan:				***Unused loan facilities to debtors:***
Lancar	1.290.280	(2.006)	(12.903)	*Current*
Dalam perhatian khusus	-	-	-	*Special mention*
Kurang lancar	-	-	-	*Substandard*
Diragukan	-	-	-	*Doubtful*
Macet	-	-	-	*Loss*
Jumlah	**1.290.280**	**(2.006)**	**(12.903)**	***Total***

	31 Desember 2024/*December 31, 2024*			
	Pokok/ ***Principal***	**Cadangan kerugian penurunan nilai/** ***Allowances for impairment losses***	**Penyisihan penilaian kualitas aset sesuai ketentuan POJK/** ***Assets quality allowances based on POJK***	
Fasilitas kredit kepada debitur yang belum digunakan:				***Unused loan facilities to debtors:***
Lancar	2.064	(39)	(21)	*Current*
Dalam perhatian khusus	-	-	-	*Special mention*
Kurang lancar	-	-	-	*Substandard*
Diragukan	-	-	-	*Doubtful*
Macet	5.600	-	(5.600)	*Loss*
Jumlah	**7.664**	**(39)**	**(5.621)**	***Total***

44. INFORMASI TAMBAHAN (lanjutan)

MANAJEMEN RISIKO

Profil risiko

1. Risiko operasional

   Risiko operasional merupakan peluang kerugian yang disebabkan adanya kegagalan proses, kelemahan sistem atau personel, kelalaian, kejahatan, kombinasi faktor diatas maupun karena faktor eksternal yang tidak selalu berada dibawah kendali Bank. Dalam pengelolaan risiko operasional, masing-masing unit usaha bertanggung jawab untuk risiko yang terjadi pada kegiatan operasional sehari-hari dengan mengacu pada kebijakan dan prosedur, pengendalian dan pengawasan rutin. Selain itu, pengelolaan risiko operasional juga meliputi hal-hal yang terkait dengan pengembangan produk, sistem informasi teknologi, sumber daya manusia dan prinsip "*know your customer*" sebagai aspek pencegahan terhadap kemungkinan adanya hal-hal yang tidak diinginkan.

   Untuk memitigasi risiko operasional, Bank:
   - Telah memiliki kebijakan, prosedur dan penetapan limit yang bermanfaat dalam memantau, mengukur dan memitigasi risiko operasional.
   - Penyusunan dan pelaksanaan Business Continuity Planning (BCP) sebagai bagian dari Business Continuity Management (BCM) yang telah dilakukan pemantauan dan pelaksanaan uji coba secara berkala, minimal setiap tahun sekali.
   - Risk Control Self Assessment (RCSA) yang terus diperbaharui sejalan dengan perkembangan bisnis Bank.
   - Adanya pemisahan fungsi Departemen yang melakukan identifikasi dan pengukuran risiko operasional di Lini 1 dan Lini 2.
   - Bank menerapkan fraud awareness secara berkala kepada seluruh karyawan serta adanya pengkinian kebijakan whistleblowing system.

2. Risiko hukum

   Risiko hukum merupakan risiko yang disebabkan oleh kelemahan sistem yuridis atau oleh adanya tuntutan hukum, ketiadaan peraturan perundang-undangan yang mendukung, atau kelemahan perikatan seperti tidak dipenuhinya syarat sahnya kontrak dan pengikatan agunan yang tidak sempurna.

44. ADDITIONAL INFORMATION (continued)

RISK MANAGEMENT

Risk profile

1. *Operational risk*

   Operational risk is an opportunity for loss caused by process failure, system or personnel weakness, negligence, crime, a combination of the above factors or due to external factors that are not always under the Bank's control. In managing operational risk, each business unit is responsible for risks that occur in daily operational activities with reference to policies and procedures, routine control and supervision. In addition, operational risk management also includes matters related to product development, information technology systems, human resources and "know your customer" principle as prevention aspect against the possibility of undesirable things.

   To mitigate operational risk, the Bank:
   - Establish policies, procedures and limit setting that are useful in monitoring, measuring and mitigating operational risk.
   - Preparation and implementation of Business Continuity Planning (BCP) as part of Business Continuity Management (BCM) which has been monitored and tested regularly, at minimum on an annual basis.
   - Continuous update on the Risk Control Self Assessment (RCSA) in line with the Bank's business growth.
   - Separation of Departmental functions that identifies and measures operational risk in Line 1 and Line 2.
   - The Bank implements regular fraud awareness to the Bank's employees and updates the whistleblowing system policy.

2. *Legal risk*

   Legal risk is the risk raised by the weakness in juridical aspects of the business, which could be caused by legal claims, non-existence of supported regulation or weaknesses in agreements, such as unfulfilled terms and conditions in contracts and incomplete collateral binding.

44. INFORMASI TAMBAHAN (lanjutan)

MANAJEMEN RISIKO (lanjutan)

Profil risiko (lanjutan)

2. Risiko hukum (lanjutan)

Bank mengelola risiko hukum dengan memastikan seluruh aktivitas dan hubungan kegiatan usaha Bank dengan pihak ketiga didasarkan pada aturan dan persyaratan yang dapat melindungi kepentingan Bank dari segi hukum.

3. Risiko strategi

Risiko strategi merupakan risiko yang disebabkan oleh adanya pengambilan keputusan dan/atau proses penerapan strategi yang tidak tepat atau kegagalan Bank dalam merespon perubahan-perubahan dari kondisi eksternal.

Risiko strategi dikelola oleh Bank melalui proses pertimbangan dan pengambilan keputusan strategis secara kolektif dan komprehensif, yang melibatkan Direksi dan Komite-Komite yang telah dibentuk.

4. Risiko kepatuhan

Risiko kepatuhan adalah risiko yang terjadi akibat Bank tidak mematuhi atau tidak melaksanakan peraturan perundang-undangan dan ketentuan lainnya yang berlaku.

Bank mengelola risiko kepatuhan dengan melakukan penelaahan secara komprehensif untuk memastikan kesesuaian prosedur standar operasional serta pengembangan produk baru Bank dengan peraturan eksternal.

5. Risiko reputasi

Risiko reputasi timbul dari adanya publikasi negatif yang terkait dengan kegiatan usaha Bank atau persepsi negatif mengenai Bank.

Risiko reputasi Bank dikelola dengan pemberian pelayanan terbaik kepada nasabah, pembentukan unit pengaduan nasabah dan memastikan kesesuaian seluruh aktivitas kegiatan usaha Bank dengan peraturan yang terkait.

44. ADDITIONAL INFORMATION (continued)

RISK MANAGEMENT (continued)

Risk profile (continued)

2. Legal risk (continued)

Legal risks are managed by ensuring that all activities and business relationships between the Bank with third parties are based on rules and conditions that are able to protect the Bank's interests from a legal perspective.

3. Strategic risk

Strategic risk is the risk caused by improper decision making and/or improper strategic implementation process or the Bank's failure in responding to changes from external conditions.

Strategic risk is managed by the Bank through collective and comprehensive consideration and strategic decision making, which involves the Board of Directors and established Committees.

4. Compliance risk

Compliance risk is the risk that occurs as a result of the Bank not complying with or not implementing applicable laws and regulations.

The Bank manages its compliance risk by performing comprehensive review to ensure that the Bank's standard operational procedures and new product development conform with external regulations.

5. Reputation risk

Reputation risk arises from negative publications related to the Bank's business activities or negative perceptions about the Bank.

The Bank manages its reputation risk by providing the best service to customers, establishing a customer complaints unit and ensuring compliance to the prevailing regulations in all of the Bank's business activities.

44. INFORMASI TAMBAHAN (lanjutan)

MANAJEMEN MODAL

Sebelum 1 Januari 2015, Bank menghitung kebutuhan modal berdasarkan (Peraturan Bank Indonesia) PBI No.14/18/PBI/2012 tanggal 28 November 2012 tentang Kewajiban Penyediaan Modal Minimum Bank Umum berdasarkan Peringkat Profil Risiko, yang merupakan perubahan dari PBI No.10/15/PBI/2008 tanggal 24 September 2008.

Bank menghitung kebutuhan modal berdasarkan Peraturan Otoritas Jasa Keuangan (POJK) No. 34/POJK.03/2016 tanggal 26 September 2016 tentang "Perubahan atas Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2016 tentang kewajiban Penyediaan Modal Minimum Bank Umum", dimana modal yang diwajibkan regulator dianalisa dalam dua *tier* sebagai berikut:

- Modal inti (*tier* 1), yang terdiri dari modal inti utama dan modal inti tambahan. Modal inti utama antara lain meliputi modal ditempatkan dan disetor penuh, tambahan modal disetor, cadangan umum, laba tahun lalu dan tahun berjalan (100%), penghasilan komprehensif lainnya berupa potensi keuntungan/kerugian yang berasal dari perubahan nilai wajar aset keuangan dalam kelompok nilai wajar melalui penghasilan komprehensif lain, selisih kurang dari penyisihan penghapusan aset produktif sesuai ketentuan Bank Indonesia dan cadangan kerugian penurunan nilai aset produktif yang diperbolehkan. Aset pajak tangguhan, aset tak berwujud (termasuk *goodwill*) dan penyertaan (100%) merupakan faktor pengurang modal inti utama. Modal inti tambahan antara lain terdiri dari saham preferen, surat berharga subordinasi dan pinjaman subordinasi dimana ketiganya bersifat non-kumulatif setelah dikurangi pembelian kembali.

- Modal pelengkap (*tier* 2) antara lain meliputi surat berharga subordinasi dan pinjaman subordinasi serta penyisihan penghapusan aset produktif sesuai ketentuan Bank Indonesia.

Bank wajib menyediakan modal inti (*tier* 1) paling rendah sebesar 6% dari ATMR dan modal inti utama (*Common Equity tier* 1) paling rendah sebesar 4,5% dari ATMR.

- Modal *tier* 1, meliputi modal ditempatkan dan disetor penuh, cadangan umum, saldo laba dan laba tahun berjalan.
- Modal *tier* 2, meliputi penyisihan kerugian penurunan nilai yang diperbolehkan.

44. ADDITIONAL INFORMATION (continued)

CAPITAL MANAGEMENT

Before January 1, 2015, the Bank calculates its capital requirements in accordance with Bank Indonesia Regulation (PBI) No.14/18/PBI/2012 dated November 28, 2012 on Minimum Capital Reserve for General Bank based on Risk Profile Rating, which amends PBI No.10/15/PBI/2008 dated September 24, 2008.

The Bank calculates its capital requirements in accordance with Financial Services Authority Regulation (POJK) No. 34/POJK.03/2016 dated September 26, 2016 about "Changes to POJK No. 11/POJK.03/2016 related to Minimum Capital Reserve for General Banks", where the regulatory capital is analyzed into two tiers as follows:

- *Tier 1 capital, which consists of core and additional core capital. Core capital includes issued and fully paid-up capital, additional paid-in capital, general reserve, specific reserve, retained earnings and profit for the year (100%), other comprehensive income deriving from potential gain/loss from the changes in fair value of financial assets classified as fair value through other comprehensive income, shortfall between allowable amount of allowance for uncollectible account on productive assets according to Bank Indonesia guideline and allowance for impairment losses on productive assets. Deferred tax assets, intangible assets (including goodwill) and share investments (100%) are deducted from core capital. Additional core capital includes non-cumulative preference shares, subordinated securities and subordinated debts net of buyback portion.*

- *Supplementary capital (tier 2), which includes subordinated securities and subordinated debts and allowance for uncollectible account on productive assets according to Bank Indonesia guideline.*

Banks are required to provide core capital (tier 1) at a minimum of 6% from RWA and Common Equity tier 1 at a minimum of 4.5% from RWA.

- *Tier 1 capital, which includes issued and fully paid share capital, general reserve, retained earnings and profit for the year.*
- *Tier 2 capital, which includes the eligible amount of allowance for impairment losses.*

44. INFORMASI TAMBAHAN (lanjutan)

MANAJEMEN MODAL (lanjutan)

Bank tidak mempunyai modal tambahan lain yang memenuhi kriteria modal *tier* 3 sesuai dengan peraturan Bank Indonesia yang berlaku.

Berbagai batasan telah diterapkan untuk bagian-bagian modal yang diwajibkan oleh regulator. Pengaruh dari pajak tangguhan telah dikeluarkan dalam menentukan jumlah saldo laba untuk modal *tier* 1; hanya 50 persen laba tahun berjalan sebelum pajak tangguhan yang dapat diperhitungkan dalam modal *tier* 1; dan modal *tier* 2 tidak boleh melebihi modal *tier* 1 Juga terdapat batasan jumlah penyisihan kolektif penurunan nilai yang boleh dimasukkan sebagai bagian dari modal *tier* 2.

Aset Tertimbang Menurut Risiko ("ATMR") Bank ditentukan berdasarkan persyaratan yang telah ditentukan yang mencerminkan berbagai tingkatan risiko yang terkait dengan aset dan eksposur, yang tidak tercermin dalam laporan posisi keuangan. Berdasarkan peraturan Bank Indonesia, Bank diharuskan untuk mempertimbangkan risiko kredit, risiko pasar dan risiko operasional dalam mengukur ATMR Bank.

Kebijakan Bank adalah menjaga modal yang kuat untuk menjaga kepercayaan pemodal, kreditur dan pasar dan untuk mempertahankan perkembangan bisnis di masa depan. Pengaruh tingkat modal terhadap tingkat pengembalian ke pemegang saham juga diperhitungkan dan Bank juga memahami perlunya menjaga keseimbangan antara tingkat pengembalian yang tinggi, yang dimungkinkan dengan *gearing* yang lebih besar serta keuntungan-keuntungan dan tingkat keamanan yang didapat dari posisi modal yang kuat.

Manajemen menggunakan rasio permodalan yang diwajibkan regulator untuk memantau permodalan Bank dan rasio-rasio modal ini tetap menjadi standar industri untuk mengukur kecukupan modal. Pendekatan OJK untuk pengukuran ini terutama didasarkan pada pemantauan hubungan antara profil risiko Bank dengan ketersediaan modal. Bank wajib menyediakan modal minimum sesuai profil risiko.

Penyediaan modal minimum sebagaimana dimaksud ditetapkan sebagai berikut:

a. Untuk profil risiko peringkat 1 (satu), modal minimum terendah yang wajib dimiliki adalah 8% dari Aset Tertimbang Menurut Risiko;
b. Untuk profil risiko peringkat 2 (dua), modal minimum terendah yang wajib dimiliki adalah 9% sampai dengan kurang dari 10% dari Aset Tertimbang Menurut Risiko;

44. ADDITIONAL INFORMATION (continued)

CAPITAL MANAGEMENT (continued)

The Bank does not have any other supplementary capital which meets the criteria of tier 3 capital under prevailing Bank Indonesia's regulation.

Various limits are applied to elements of the regulatory capital. The effect of deferred taxation has been excluded in determining the amount of retained earnings for tier 1 capital; only 50 percent of the profit for the year before deferred taxation is being included in tier 1 capital; and qualifying tier 2 capital cannot exceed tier 1 capital. There is also a restriction on the amount of collective impairment allowances that may be included as part of tier 2 capital.

The Bank's Risk Weighted Assets ("RWA") are determined according to specified requirements which reflect the varying levels of risk attached to assets and exposures not recognised in the statement of financial position. Based on Central Bank regulations, the Bank needs to take into consideration its credit risk, market risk and operational risk in measuring the RWA.

The Bank's policy is to maintain a strong capital base to maintain investor, creditor and market confidence and to sustain future development of business. The impact of the level of capital to shareholders' return is also considered and the Bank also recognises the need to maintain a balance between the higher return that might be possible with greater gearing and the advantages and security level afforded by a strong capital position.

Management uses regulatory capital ratios in order to monitor its capital base, and these capital ratios remain the industry standards for measuring capital adequacy. FSA's approach to such measurement is primarily based on monitoring the relationship of the Bank's risk profile with the available capital. The Bank is required to provide minimum capital based on the risk profile.

Minimum capital requirements are as follows:

a. For banks with risk profile rating 1 (one), the minimum capital requirement is 8% of Risk Weighted Asset;
b. For banks with risk profile rating 2 (two), the minimum capital requirement is 9% to less than 10% of Risk Weighted Asset;

44. INFORMASI TAMBAHAN (lanjutan)

MANAJEMEN MODAL (lanjutan)

Penyediaan modal minimum sebagaimana dimaksud ditetapkan sebagai berikut: (lanjutan)

c. Untuk profil risiko peringkat 3 (tiga), modal minimum terendah yang wajib dimiliki adalah 10% sampai dengan kurang dari 11% dari Aset Tertimbang Menurut Risiko;

d. Untuk profil risiko peringkat 4 (empat) atau 5 (lima), modal minimum terendah yang wajib dimiliki adalah 11% sampai dengan kurang dari 14% dari Aset Tertimbang Menurut Risiko.

Posisi modal yang diwajibkan sesuai peraturan Bank Indonesia yang berlaku pada tanggal 31 Desember 2025 dan 2024 adalah sebagai berikut:

44. ADDITIONAL INFORMATION (continued)

CAPITAL MANAGEMENT (continued)

Minimum capital requirements are as follows: (continued)

c. For banks with risk profile rating 3 (three), the minimum capital requirement is 10% to less than 11% of Risk Weighted Asset;

d. For banks with risk profile rating 4 (four) or 5 (five), the minimum capital requirement is 11% to less than 14% of Risk Weighted Asset.

The Bank's regulatory capital in accordance with Bank Indonesia regulation as of December 31, 2025 and 2024 was as follows:

	31 Desember 2025/ *December 31, 2025*	**31 Desember 2024/ *December 31, 2024***	
Modal inti (*Tier* 1)	4.027.649	3.325.430	*Core capital (Tier 1)*
Modal pelengkap (*Tier* 2)	60.756	75.603	*Supplementary capital (Tier 2)*
Jumlah modal	4.088.405	3.401.033	*Total capital*
Aset tertimbang menurut risiko			*Risk weighted asset*
Risiko kredit	7.396.131	8.799.110	*Credit risk*
Risiko operasional	935.868	835.188	*Operational risk*
Risiko pasar	-	-	*Market risk*
Rasio penyediaan modal			*Capital adequacy ratio*
Dengan risiko kredit dan operasional	49,07%	35,30%	*With credit and operational risk*
Dengan risiko kredit, pasar dan operasional	49,07%	35,30%	*With credit, market and operational risk*

Posisi rasio Kewajiban Penyediaan Modal Minimum (KPMM) Bank tanggal 31 Desember 2025 dan 2024 masing-masing sebesar 49,07% dan 35,30%.

The Capital Adequacy Ratio (CAR) of the Bank as of December 31, 2025 and 2024. respectively is 49.07% and 35.30%.

Bank telah mematuhi semua persyaratan modal yang ditetapkan oleh pihak regulator sepanjang periode pelaporan, khususnya berkenaan dengan perhitungan Kewajiban Penyediaan Modal Minimum (KPMM) dan Aktiva Tertimbang Menurut Risiko (ATMR).

The Bank has complied with all regulatory imposed capital requirements throughout the reporting period, particularly regarding Capital Adequacy Ratio (CAR) and calculation of Risk Weighted Assets (RWA).

44. INFORMASI TAMBAHAN (lanjutan)

44. ADDITIONAL INFORMATION (continued)

RASIO KEUANGAN PENTING LAINNYA

OTHER SIGNIFICANT FINANCIAL RATIOS

	31 Desember 2025/ ***December 31, 2025***	**31 Desember 2024/** ***December 31, 2024***	
Aset produktif bermasalah dan non produktif bermasalah terhadap jumlah aset produktif dan non produktif	2,02%	2,99%	*Adversely classified earning assets and non-earning assets to the total earning asset and non-earning assets*
Aset produktif bermasalah terhadap jumlah aset produktif	1,48%	1,89%	*Adversely classified earning assets to total earning assets*
Cadangan kerugian penurunan nilai aset keuangan terhadap aset produktif	2,98%	4,58%	*Allowance for impairment losses financial asset to earning assets*
NPL - bruto	3,58%	3,30%	*NPL - gross*
NPL - neto	0,89%	0,30%	*NPL - net*

45. PERISTIWA SETELAH TANGGAL NERACA

45. SUBSEQUENT EVENTS

Pada tanggal 1 Maret 2026 telah dilakukan pergantian Sekretaris Perusahaan. Sesuai dengan POJK No. 35/POJK.04/2014 dan berdasarkan Surat Keputusan Direksi No. SKEP/018/SET/BNC/II/2026, Bank telah menunjuk Sdr. Heru Sulistiadhi sebagai Sekretaris Perusahaan.

On March 1, 2026, there was a change in Corporate Secretary position. In accordance with the Regulation of Financial Services Authority No. 35/POJK.04/2014 and based on Board of Directors Decree No. SKEP/018/SET/BNC/II/2026, the Bank has appointed Mr. Heru Sulistiadhi as Corporate Secretary.

2025

LAPORAN TAHUNAN DAN LAPORAN KEBERLANJUTAN
ANNUAL REPORT AND SUSTAINABILITY REPORT

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